

## **Intergovernmental Agreement on Biosecurity Review: Draft Report**

Vinehealth Australia submission — February 2017

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### **Background**

Vinehealth Australia (Vinehealth) is pleased to put forward this submission in response to the draft report titled 'Intergovernmental Agreement on Biosecurity Review' (Draft Report) released in December 2016. As noted in Appendix C of the Draft Report, Vinehealth attended a consultation meeting in Melbourne in 2016 and has maintained a watching brief on progress with the IGAB review since.

Vinehealth is aware of a general, whole-of-government submission of the South Australian (SA) government in response to the Draft Report. Whilst Vinehealth is a statutory authority of the SA government, funding is derived from the 3,400 vineyard owners in the State, and the wine industry demonstrates clear 'ownership' of Vinehealth through board membership and direct liaison with Vinehealth regarding activities. Thus, we see value in putting forward this submission as an industry voice.

### **Vinehealth Australia**

Vinehealth Australia obtains its powers and functions from the Phylloxera and Grape Industry Act (1995). The purpose of this Act is to protect SA vineyards from pests, diseases and any other condition that may affect vine health.

At the urging of visionary wine industry leaders of the time given the imminent threat of phylloxera, the Phylloxera Board of South Australia (as Vinehealth Australia was then known) was established in 1899 with the development of the Phylloxera Act (1899), a predecessor to the current Act established in 1995. Since this time Vinehealth Australia has provided an unbroken 117 year period of focus on vine biosecurity; beginning long before the emergence of modern biosecurity structures and frameworks in place today, and is a model for the way government and industry can collaborate successfully on biosecurity.

Vinehealth's mandate is to protect SA vineyards, which equates to approximately 50% of winegrape plantings across Australia. However, with the increasingly complex and rapidly evolving biosecurity landscape it is evident that it cannot fulfil this mandate without working collaboratively and collectively with other States and Territories across Australia. To this end, Vinehealth continues to work to ensure it enables all Australia winegrape growers to be active in protecting their vineyards, and more broadly the sustainability of the wine industry.

Vinehealth's stability through industry funding and leadership, its proud history and 'ownership' by industry ensures that it will continue to provide an important focus on vine health, biosecurity and awareness of threats to the Australian wine industry, which contributes \$40.2 billion in gross output to the Australian economy.

It is with this history, expertise and insight that Vinehealth puts forward the following comments against selected recommendations and 'requests for feedback'.

## Comments on draft recommendations and requests for feedback

### ROLES AND RESPONSIBILITIES

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#### Recommendation 1

- Vinehealth supports this recommendation; however, it is somewhat confusing that items that recommendation 1 seeks to address in a draft National Statement of Intent are then covered by recommendations proposed in the Draft Report. This is somewhat contradictory to the open, transparent and collaborative process that is advocated in recommendation 1 and pre-empted work of the NBC/Advisory Committee. Obviously this is dependent on how recommendations in the final report of the IGAB review are endorsed and or adopted.

#### Request for feedback 1

- In the first instance, it must be recognised that each industry will have differing representative and statutory structures supporting it. Therefore, to use the word 'industry' as a collective often ignores the complexity of individual industries and the work required by industries to collectively honour their obligations under the 'shared responsibility' mantra.
- The wine industry has over 5,000 grape growers, 76 regional, 7 state and 2 national representative bodies, 2 statutory authorities (Wine Australia and Vinehealth Australia), a research institute and other allied industry bodies.
- Given the breadth of industry representative bodies, clarity of roles and responsibilities within an industry must align with those of the national biosecurity system, so that as an 'industry' it can effectively feed into the larger biosecurity landscape and conversation with governments and the community. The wine industry is currently addressing this issue by clarifying roles and responsibilities.
- Vinehealth agrees with the roles and responsibilities noted for 'industry' in Table 1, p.11, however put forward the following points for consideration and inclusion:
  - Maintaining and supporting levy collection for relevant Research & Development Corporation (RDC) — this may be implied in 'maintaining capacity to prepare for, and respond to, exotic pests and diseases', however we believe it should be explicit
  - Strategic input and guidance for their industry RDC regarding funding of biosecurity priorities
  - Implementation and operation (in conjunction with State government) of industry accreditation/endorsement schemes and initiatives, which ensure compliance to international or domestic obligations and regulations, or promote best practice biosecurity practices
  - Management of foundation data (eg. maps of vineyards, variety, rootstock, source of planting material, hectares etc) for their industry, which under agreement with State governments can be accessed (under strict confidentiality) for particular biosecurity purposes (exotic incursion, significant endemic incursion)
  - Issue identification with current biosecurity policies / frameworks / practices — again this may be implied in other roles and responsibilities noted, however industry needs to have a clear mechanism to feed concerns through to government and/or community
  - Strong role in pest prioritisation for their own industry and more broadly for Australia
- On reflection of the contents in Table 1, the land owners and those in the production supply chain for a particular commodity/product should be at the heart of all discussions; it is noticeable that this is somewhat lost in Table 1. The role of the land owner and those in the supply chain is pivotal; after all this is the reason for our biosecurity system. Additionally, where do those in the supply chain for a product fit within Table 1 — is it within the 'industry' category?
- In addition, the absence of RDC's as a participant in Table 1 is noticeable. RDC's are a critical participant in the current and future biosecurity system, who have a key role in funding innovation and R,D&E but also in the pest prioritisation process, response to exotic incursions etc. As a system we need to better link RDC's with practical biosecurity outcomes by including them in the biosecurity conversation at all levels, and not just limited to R,D&E.

- Suggest that the 'industry' category be defined (who's in and who's not) to ensure clarity as to the application of the roles and responsibilities and also identifying gaps.
- A cautionary comment — the development of these overarching roles and responsibilities is needed; however, how this relates to practical everyday situations and issues still needs to be resolved. Operationally, substantial work will be required to translate these stated roles and responsibilities into meaningful actions on the ground — when this is done, and only then, will we see a transformational shift in biosecurity outcomes.

## MARKET ACCESS

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- Wine, rather than grapes are exported; however harvested grapes are moved between States. Therefore, unlike many other sectors the biosecurity imperative for the wine industry is not significantly weighted on international market access for the raw product, but rather on (1) domestic market access for grapes (and other associated vectors that can carry pests), (2) sustainable vineyard operations which support growers, wineries and a network of suppliers and regional communities, and (3) growing a quality premium value proposition for Australian wine produced from a clean, green environment to support export growth and inbound tourism. Currently, Australia exports 738 million litres of wine to 119 countries valued at \$2.1 billion.
- As highlighted by the CSIRO 2014 Report titled "Australia's Biosecurity Future", consumers expect quality to be applied on a continuum beginning with processes to ensure the quality and safety of a 'raw product' through every step in the development to a 'finished product'. As such, the importance of biosecurity to vine health directly correlates with perceptions around the quality of the finished wine.
- Across the Australian horticultural industry, the wine industry is unique for its direct interactions with its customers via wine tourism. Wine tourism bridges the gap which traditionally separates and disconnects consumers from the 'where' and 'how' of production. Vineyards and cellar doors offer the consumer a unique opportunity to directly engage with a number of the stages of wine production, starting with the growing of the grapes. This brings opportunities, but also risks, including biosecurity risks.
- The perception is that the Draft Report and Australia's current biosecurity system appears to place greater importance on those products where biosecurity threats may directly impact export trade of the 'raw product'. However as outlined in the points above, increased acknowledgement and prioritisation of the impact of a biosecurity incursion in an industry, such as the wine industry, is warranted. If an incursion significantly impacts the wine industry's ability to produce premium grapes, and thus wines, to feed burgeoning demand in export markets, then the impact on the growers, winemakers, suppliers across the supply chain, regional communities and the tourism sector is equally as significant. This may just be a perception and not reality, but this perception must be addressed nonetheless.

### Request for feedback 2

- The determination of area freedom is required to know where a pest is or isn't. Of debate is whether this should be at a State (jurisdiction), regional or property basis, or a combination. The pros and cons of a suggested move towards risk-based property assessment needs to be clearly articulated and industry involved in a constructive conversation as to its merits, as compared to current State-based area freedom in conjunction with particular quarantine management zones within States as required.
- Currently, even though some States have stated area freedom for particular pests, this does not always yield benefits in relation to domestic market access and particulars of Interstate Certification Assurance (ICA) schemes. This begs the question as to why other forces are able to override an established system.

- An example of expenditure to maintain SA's area freedom status from phylloxera:
  - Active surveillance for phylloxera in SA
    - Vinehealth has conducted an aerial surveillance program for SA since 2001 using remote sensing and GIS technologies.
    - Digital multi-spectral imagery is collected in summer and enhanced using a range of algorithms which highlight vines that have low vigour relative to the general health of the total vineyard block.
    - These maps are overlaid on previous maps collected for that region to identify locations that should be physically inspected for phylloxera or other conditions that can affect vine health.
    - Imagery is collected every three to five years for each grape growing region in SA which enables multiple-year comparisons to detect vine decline.
    - In the coming year, it is envisaged that this aerial detection program (with ground truthing) will be complemented with an on ground strategy whereby soil samples are collected and analysed by high throughput quantitative polymerase chain reaction (qPCR) for phylloxera DNA.
    - The current cost to Vinehealth of this aerial surveillance program, including procurement of maps, digitisation and analysis over existing vineyard maps, maintenance of a vineyard register and supporting technology, ground truthing and on costs, is between \$100,000 and \$150,000 per year.
    - This surveillance is seen as imperative by the SA wine industry to ensure early detection of phylloxera incursions to enable containment and management, to support domestic market access for the movement of phylloxera vectors (grapes, grape products, machinery, planting material etc.), and to support the premium quality of wines. Such surveillance programs also assist with general awareness and communication among industry.
    - As noted above, this surveillance program does not support export trade of grapes ('raw product') given conversion in Australia, however it does directly support a quality premium image of Australian wine produced from a clean, green environment, which will drive export growth and inbound tourism.
    - Vinehealth feeds this surveillance information directly to Biosecurity SA.

### **General comments on recommendations**

- A significant threat to vineyards is phylloxera; with 83 strains endemic and over 400 strains exotic to Australia. Management zones and strict quarantine protocols are used to ensure that phylloxera does not move between these management zones
- State-based plant quarantine standards are currently based on the National Phylloxera Management Protocols (NPMP); however there is no active custody of these protocols or clear mechanism for review based on new scientific findings. These NPMP contain endorsed methods for establishing and maintaining area freedom.
- Ownership and accountability of such protocols that are the foundation for State quarantine standards is urgently needed, with a clear review process in place to ensure they reflect and are informed by the latest research results and industry sentiment. Currently, the NPMP are out of date and require significant modification. Vinehealth proposes that a standard review process (including dispute resolution) be established that can be used across different pests; albeit with customisation for particular industries and pests as necessary. This review process should be driven by PHC / NBC / PHA and the subcommittee structure. This strongly supports Recommendations 5 and 6.
- Of importance is that the biosecurity community needs to increase investment in new technologies and movements, such as citizen science, which will greatly increase efficiency and effectiveness of any surveillance program.

## RESEARCH AND INNOVATION

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### Request for feedback 3

- Vinehealth has invested 15% of its annual income from SA growers into the Plant Biosecurity Cooperative Research Centre (PBCRC) for the 6 year life of this centre. Important benefits for Vinehealth has been access and networking with a broad range of biosecurity experts and technical specialists.
- As a participant of the PBCRC, Vinehealth has been aware of the various stages of the development of the Smart Biosecurity: Australasian Plant Biosecurity Collaborative Science Institute.
- With a close working relationship with Australia Grape & Wine Authority (AGWA), the wine industry's RDC, we have been involved in discussions regarding an alternate model for ongoing biosecurity R&I investment post PBCRC (June 2018).
- Vinehealth advocates for increased strategic cross-sectoral and industry-specific investment in biosecurity R&I, however it is somewhat perplexing how the discussion around future structures to support such R&I has played out. The way in which options are being canvassed, discussed and developed lacks a transparent process which truly engages all and seeks the best option to protect Australia's biosecurity status. In some ways, this is reflective of the embedded issues across the biosecurity landscape.
- Details provided for the proposed options in the Draft Report are brief. Given the importance of R&I and its ongoing contribution to the national biosecurity system, provision of a comprehensive analysis would enable a considered assessment to be made.
- Vinehealth will continue working closely with AGWA to further develop the wine industry's investment in wine and grape biosecurity R&I, and also in cross-sectoral biosecurity R&I.

## SYSTEM PERFORMANCE

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### Recommendation 36

- Vinehealth strongly supports the development of performance metrics for the national biosecurity system.
- These performance metrics should support a maturity ranking for each industry with respect to biosecurity, and also of the national biosecurity system. The assessment of industry maturity will identify gaps, opportunities and provide insight into national R&I, surveillance, governance and many other biosecurity strategies and arrangements.

### Recommendation 37

- Vinehealth under its Act must maintain a Vineyard Register of all vineyards in SA, including hectares, owner contact details, rootstock, variety, source of planting material. This register is invaluable to preventing, preparing for, managing and recovering from an incursion. This industry-funded register is current with the 'phylloxera levy' included as part of the settlement process for a property.
- Vinehealth is currently updating the technology platform of this register and developing it into a biosecurity platform, the data of which can then be truly leveraged for biosecurity purposes and other industry needs (of course whilst respecting strict privacy constraints)
- This register and platform is a truly unique asset to the wine industry, one which is the envy of other industries. Through this register we have direct access to all growers in SA for emergency and general communications and awareness. Together with the agility of Vinehealth to direct resources as required, this register is a powerful knowledge management tool.
- The current evolution of the register will ensure direct interoperability with other State and national biosecurity IT/knowledge management systems.
- This model in SA of industry ownership of a complete register of foundation information highlights that industry can take the lead in owning biosecurity information that can assist in the event of an incursion. Arrangements can then be put in place to use this data for trace

back or trace forward activities as required in conjunction with State governments. In addition, it is a mechanism to ensure partnerships between industry and government to deliver outstanding biosecurity outcomes. Importantly, this register is not just a 'contact list' of levy payers, it contains key information for each grower (such as variety, rootstock etc.) that will assist in the event of an incursion.

Vinehealth commends the work of the panel in facilitating a much needed discussion on IGAB and the national biosecurity system and sees this review as integral to the continuous improvement of this system. Industry involvement at all levels of the national biosecurity system must be increased and mechanisms put in place to facilitate this. How the proposed recommendations translate into everyday biosecurity operational decision making will be the true test of their value.

Please do not hesitate to contact me on 0418 818 543 if you require any further information.

In anticipation of the final report,

Yours sincerely

A handwritten signature in black ink, appearing to be 'IP', with a long horizontal line extending to the right.

Inca Pearce  
**CEO**