



IGAB Review

WA Fishing Industry Council Queensland Seafood Industry Association Seafood Industry Victoria

Introduction

The Australian commercial fishing, pearling and aquaculture industry is a \$2.5 billion per annum industry operating mainly in remote regions of the nation and within an environment that allows free movement of pests and diseases without boundaries, walls or fences.

A strong, reliable and effective biosecurity system is critical to the health and sustainability of one of our most important iconic Australian industries.

Our seafood and pearls are held in the highest regard in both the domestic and international markets for quality and consistency of supply. Much of the Australian seafood industry is reliant on robust biosecurity arrangements showing freedom from disease that underpins export certification. Robust biosecurity arrangements are equally important for Australian seafood producers who supply mainly domestic markets to protect them from the threat of exotic diseases and pests that can devastate stocks. So much of this high regard is based on the pristine conditions of our waterways and world-class expertise in catching, growing and processing our products.

The oceans, estuaries and rivers of Australia in which our industry operates are often influenced by the actions of others over which we have little control – ship ballast water, hull fouling, upstream industrial/agricultural pollution and imported fish/mollusc products. A body of RD&E carried out within our industry has demonstrated that the aquatic environment is an extremely difficult environment to manage with respect to biosecurity. Once undesirable organisms get a hold in the aquatic environment they are almost impossible to eradicate or contain making the key biosecurity roles in the aquatic space one of either *'prevention or asset based protection'*.

It is estimated that around 250 introduced marine species have been discovered in Australian waters and there is every reason to believe that more will be discovered in coming years. The Draft Report itself highlights increased growth in shipping activity into Australia in the near future and as such the biosecurity risk from ballast water is expected to be on the increase, not decrease.

The majority of introductions appear to be related to ballast water. It is known that some of these exotic species that establish in Australian waters can bring with them their own array of infectious agents, including viruses, bacteria, parasites and fungi. (see <http://www.marinepests.gov.au/Pages/default.aspx>)

General Comments on Draft Report

The Draft Report sets out that the IGAB created a framework for governments to coordinate and identify priority areas of reform and action to build a stronger and more effective national biosecurity system. The national biosecurity system's goals and objectives under the IGAB aim to minimise the harm that exotic pests and diseases can have on the Australian economy, environment and community.

The Draft report recognises the IGAB's significant achievements but sets out that *'Nevertheless, the challenges facing stewardship of the national biosecurity system continue to build. Biosecurity risks are growing due to increased global trade and travel, increased agricultural expansion and intensification, increased urbanisation close to farmlands, and other factors such as climate change. A tight fiscal environment for governments has placed significant pressure on biosecurity budgets and the ongoing capacity of jurisdictions to meet their biosecurity commitments'*.

The Report highlights *'Dynamic changes are forecast in the maritime sector: coastal and international trading (facilitating Australia's maritime trade) is expected to see more foreign flagged vessels operating; and cruise ships are increasingly visiting low-volume regulated ports in New South Wales and Western Australia, anchoring offshore and transporting passengers to destinations in far north Queensland and north Western Australia.'*

The commercial fishing and aquaculture industry agrees challenges remain. One just needs to look at the recent devastation created from the White Spot Prawn disease impacting wild harvest and farmed prawns in Queensland, Pacific Oyster Mortality Syndrome in NSW and Tasmania and the Pearl Oyster Oedema Disease in Western Australia as classic examples in the aquatic sector.

We agree with the views of the Review team that traditionally biosecurity has been the responsibility of ministers for agriculture or primary industries and that in practice, it is difficult to judge the level of engagement of these 'lead' ministers for biosecurity involving other ministers (eg fisheries) as there are no formal mechanisms to facilitate this.

The Report correctly sets out that the focus must include identification of prevention, emergency preparedness and response requirements and responsibilities as well as early detection and accurate, timely diagnosis of national priority pests and diseases.

Our industry agrees with the Report findings that there is little evidence of a systematic approach, involving all system participants, to planning and responding. We support the Review findings that environmental biosecurity considerations should be comparable to human health and national arrangements need to be explicitly developed to address environmental risks.

We agree with submissions of other non-government stakeholders to your Review that were generally supportive of a national biosecurity agreement but have been almost uniformly critical of the lack of involvement of these stakeholders in its

development. We agree that the IGAB aim sought to build relations with industry and community groups, but it failed to involve them in its development. Our industry supports the proposal to introduce a specific process, inclusive of all the parties involved, to profile, plan and consider funding for each national priority pest and disease. However in our view the involvement of parties other than government must be through explicit, formal arrangements at decision making levels.

We support that proposed governance structures that should provide the National Biosecurity Committee (NBC) with greater autonomy but our support is predicated on inclusion of representatives of industry and the community as 'members' on the NBC in their own right.

The Draft Report sets out that effective national strategies should be developed, costed and effectively actioned using the principles developed under the IGAB. The IGAB Section 4.1(vii) requires that governments, industry and other relevant parties are involved in decision making, according to their roles, responsibilities and contributions.

We note the Review team recommendation to establish a role for industry and the community in further developing the national system through establishing an Industry and Community Committee directly advising to the NBC. This would be a lesser outcome to direct membership of the NBC as the industry and community would remain in an advisory capacity only and not in decision making as IGAB requires in s4.1(vii).

We note that resourcing the national system remains a key challenge and that doing nothing is not a viable option. However we believe that a system that closely engages industry in making decisions will develop significant cost efficiencies. The general view is usually that costs will just increase which immediately removes incentive for government and industry to work on finding cost efficiencies in the delivery of the system and thus fails to find a responsible balance between private and public benefit.

We note that the Biosecurity Import Risk Analysis (BIRA) is not within the scope of this Review but we share the concerns expressed by some governments and industry stakeholders around this process and recent outcomes (eg imported prawns or barramundi). These concerns relate primarily to the tension around biosecurity between domestic industry protection and international trade considerations.

Additionally there are also concerns around science, pest and disease risk, and the lack of industry engagement on any underlying strategy for the BIRA work program. We support the submission of the NFF *"industry could be engaged more on priorities to better align the departments import analysis and export market access work"* (National Farmers' Federation submission, p7).

There will always be a level of imported product needed to meet domestic consumption of seafood. That being the case the level of scrutiny applied to imported products is needed to ensure diseases like White Spot Disease do not enter Australia regardless of trade agreements. The key risk is uncooked product as the risks of bringing in disease drops significantly if product is cooked.

Comments on Recommendations and Feedback Requests

This submission supports the recommendations contained in the Draft Report unless specifically commented on below:

Feedback Request 1 reads: *The Review Panel seeks feedback on the draft roles and responsibilities of national biosecurity system participants.*

There is a gap in the table presented in the Report. An explicit role within government is required to 'establish formal consultative processes' within major biosecurity sectors (eg marine, estuary and freshwater). This requirement is highlighted in Section 2.4 of the Draft Report.

The Report comments that the national biosecurity system, which brings together the work and priorities of all jurisdictions and industries, would benefit significantly from a clear, agreed statement of national priorities.

This responsibility should lie within the Commonwealth Government as the main issues will be policy development, prioritization, risk assessment and co-ordination at the highest levels. This fits with the streamlining of COAG ministerial council arrangements in 2013 where governments jointly tasked the Agriculture Ministers' Forum (AGMIN) and its sub-committee, the National Biosecurity Council, with national coordination of biosecurity.

We support the Review team position that there must be an unambiguous and consistent process that prioritises the terrestrial animal, aquatic animal, plant and environmental pests and diseases that pose the most significant risks. The process must be able to systematically work through the risks to establish the level of effort and resources required to address the risks in a manner that provides the greatest return.

The process must apply the true definition of 'consultation' with industry stakeholders and not just 'notification' of government decisions - a criticism noted by some submissions in relation to current processes.

We strongly believe that the establishment of an unambiguous and consistent approach will be especially important if resourcing issues consider increased sharing of costs across industry and government.

The role '*promoting partnerships*' is a somewhat ambiguous term used in the Table. Similarly, the meaning and application of 'shared responsibility' needs to be clarified, particularly in the context of funding responses to incursions of exotic diseases and pests. There is need for formal consultation processes to be established to allow effective interaction to take place. As set out in the Draft Report, the central theme flowing through many of the draft recommendations was that governments, industry and the community should adopt a systematic approach to determining and planning for national priority animal, plant and environmental pests and diseases.

Clear, formal consultation and decision pathways will deliver on this theme and force the necessary discipline into government agencies and industry to deliver on agreed outcomes and outputs. If industry is expected to share the biosecurity action and cost

burden then industry inclusion in formal decision and consultation processes is a must. It will also lead to the highlighted need in the Draft Report for greater ownership and participation from industry.

The fishing industry is experienced operating within formal policy and management decision processes utilizing trusted industry representation networks to deliver, together with government, arguably the best fisheries management system in the world.

The Draft Report sets out that Australian governments should provide greater opportunities for industry to be involved in what have traditionally been government areas of discrete responsibility. Formal consultation arrangements are an important starting point on the desired co-management spectrum. The Draft Report highlights that the changes made to the biosecurity roundtables (joint government-industry fora) in recent years—from information provision to genuine discussion—is seen as a step in the right direction.

We propose the next step is to involve industry in the making of the decisions.

Feedback Request 2 reads: *'The Review Panel seeks feedback on the total effort and costs associated with demonstrating area freedom by jurisdictions, and the value of that trade.'*

Eradication has not been a realistic response option for the majority of aquatic biosecurity outbreaks so far in Australia. There have been exceptions to this, but they were for pests and not diseases. Response to a localised detection of White Spot Syndrome Virus in 2000 was believed to have eradicated the disease. The current outbreak of the same disease in Queensland prawns now appears to be established in wild populations of as well, making eradication most unlikely.

The submission to the Draft Report from the Fisheries Research and Development Corporation outlines the costs associated with demonstrating area freedom through prevention and asset protection in our industry.

Recommendation 10 reads: *The Australian Government should establish the senior, expert position of Chief Environmental Biosecurity Officer within the environment department. A less preferred option is to house the position in the agriculture department. The position should report on the effectiveness of Australia's environmental biosecurity arrangements and achievements. Reports should be made publicly available.*

A biosecurity function is more than just disease response and should be focused on the protection of the domestic environment and markets from the negative outcomes of the incursion of diseases. White Spot Disease has impacted production, wrecked micro and small businesses in the aquaculture sector and may well do the same to the wild harvest sector. This creates a negative image of our industry. These are all industry issues well outside the responsibility of an environment department.

Our preference would be to have that position in the Department of Agriculture & Water Resources (DAWR) within a single area of biosecurity management. This makes sense given DAWR is also responsible for Natural Resource Management (NRM). It would make it easier to ensure collaborative priority setting.

Draft recommendation 11 reads: *The NBC should establish and resource a new Environmental Biosecurity Committee (EBC), comprising government and external environment biosecurity experts and representatives from both the animal and plant sectoral committees of the NBC, to support the role of the Chief Environmental Biosecurity Officer. The role of the EBC should be reviewed following its work to prioritise national biosecurity risks impacting the environment.*

We recommend that experts and representatives from the aquatic animal industry sector (fishing and aquaculture) be included independent to terrestrial animal and plant industry representatives. For too long aquatic animal interests have been rolled up into the generic 'animal' group and the aquatic sector is often forgotten due to the size and issues surrounding the terrestrial animal sector. *See our comments on new NBC committee below.*

Draft recommendation 12 reads: *Greater and explicit roles should be developed for AHA and PHA in environmental biosecurity, instituted through amended constitutions and expanded board expertise.*

Based on our comments for Recommendation 11 we submit that initially AHA expand their Board to also involve greater aquatic animal expertise (fishing and aquaculture).

Draft recommendation 13 reads: *'Jurisdictions should adopt a systematic approach to determine and plan for national priority animal, plant and environmental pests and diseases.'*

We recommend insertion of the words 'aquatic animal' between animal and plant in this recommendation.

Recommendation 15 reads: *'The sectoral committees of the NBC, with the endorsement of the NBC, should develop an agreed set of National Biosecurity R&I Priorities, in consultation with system participants and in line with the agreed national priority pests and diseases. Priorities at a sectoral and cross-sectoral level need to be considered. The priorities should be developed within two years of the final IGAB review report, and should be reviewed every five years.'*

The fishing and aquaculture industry partners with Fisheries Research and Development Corporation (FRDC) to invest in biosecurity RD&E. FRDC advises that this recommendation will duplicate the existing Animal Biosecurity RD&E Strategy and the Plant Biosecurity RD&E Strategy. Given these strategies have been agreed by all participants to the RD&E Statement of Intent (ie Commonwealth, state and territory governments, universities and RDCs) it would make sense to not have duplicate sets of priorities that do not link to the funding source or implementation process.

Feedback Request 3 reads: *‘The Review Panel seeks feedback on the following options for a new entity for cross-sectoral biosecurity R&I:*

- *Option 1: Establishing a new stand-alone entity for cross-sectoral biosecurity R&I.*
- *Option 2: Addressing cross-sectoral biosecurity R&I within an existing RDC (for example, the Rural Industries RDC).*

The Panel also seeks feedback on the funding options and would welcome alternative suggestions’.

We do not support Option 1. Our industry supports the roles of AHA and PHA in managing the two RD&E Strategies. There is also a role for RIRDC to facilitate all RDCs work together on cross-sector funding.

Currently FRDC is funding a large quantum of biosecurity related RD&E. Unfortunately the majority of this investment is in responding to failures in biosecurity at Australia’s international border. Balancing this investment so more funds were invested in prevention and surveillance RD&E would be a priority.

However, there is no clear adoption and impact pathway for RD&E invested in fishing and aquaculture biosecurity prevention. Having a clear understanding of the priorities and who would be responsible for implementing the RD&E outputs would address this. A commitment to adopt recommendations arising from aquatic biosecurity RD&E by government quarantine agencies would improve the RD&E investment in this area.

Draft recommendation 19 reads: *‘The NBC should include the CEO of the Australian Local Government Association, and the New Zealand Government be invited to include a representative.’*

Feedback Request 4 reads: *‘The Review Panel seeks feedback on the proposed Terms of Reference for the NBC.’*

We reiterate our earlier comments that the NBC should explicitly and formally include industry members appointed from nominations from industry sectors (via peak industry bodies for terrestrial animals, aquatic animals and plants) to truly replicate the Review team’s position that there must be a stronger and more formal role for industry in further developing the national system on biosecurity.

Draft recommendation 20 reads: *‘The NBC should adopt a sub-committee structure that aligns with the revised national biosecurity system objectives and national reform priorities in the IGAB. All NBC working groups and expert groups should be task-specific and, wherever possible, time-limited.’*

Even if the NBC membership is rejigged as per the Review team’s draft recommendation 19 and their proposed Terms of Reference, the arrangements will fail the co-management test if there is to be automatic acceptance of the existing NBC sub-committee structure.

Without amendment to at least include industry representatives as members of the two existing NBC aquatic animal advisory committees (Animal Aquatic Health Committee and the Marine Pest Sectoral Committee) there will be a continuation of the absence of direct industry input to formal discussions and recommendations on biosecurity at the policy and priority setting level.

These two NBC aquatic animal advisory groups currently comprise only representatives from the Australian Government and from each state/Northern Territory government. Where are the industry sectors? Lucky if invited to be observers at meetings. The expectation is that each state based government agency officer will carry the industry position as well as that of their jurisdiction. This does not seem to fit the Review team's preferred position on openness and inclusiveness of industry at the higher decision making levels.

Involvement of industry will assist to overcome the criticism from stakeholders that governments, the NBC and its sub-committees have not been sufficiently open about their activities and it will bring a new dynamic to the process.

Draft recommendation 21 reads: *'The NBC should take steps to increase its public profile and openness, including establishing a stand-alone website. The website could be maintained by, but be separate from, the Australian Government Department of Agriculture and Water Resources, and could accommodate and centralise all information on the NBC, its committees, and their activities. Key policy frameworks, agreements and reports of the NBC should be made publicly available on the site.'*

We respond by offering a similar approach as we do as an industry to myriad government agencies we deal with. Biosecurity is but one of many issues facing industry operators at any time. They often suffer consultation fatigue. The peak industry bodies are trusted information networks for their members who rely on the peak body to provide relevant information, in order of priority, in a form they can understand and knowing that the peak body can respond on their behalf in a form that is useful to the agency seeking advice. Direct provision of information from agencies to the industry peak bodies is usually far more effective than a website that is but one of dozens of websites a business needs to maintain a watching brief.

The fishing and aquaculture industry are currently reforming their national peak body to take responsibility for these national issues.

Draft recommendation 25: *'AGSOC should establish, as a priority, an Industry and Community Advisory Committee to provide advice to the NBC on key policies and reforms.'*

It will not surprise, given our earlier comments, that we regard an Industry and Community Advisory Committee to NBC to be a lesser outcome than explicit, formal industry membership on the NBC. Involvement in setting priorities and making the recommendations with government agencies provides greater ownership and responsibility for industry than an advisory capacity to a government agency dominated group.

We note the commentary from governments in relation to other processes available for input but part of the problem is that there are too many processes and we believe that the NBC, with appropriate industry membership (and working to the IGAB), will provide a more effective national focal point on biosecurity across the country. In this form the NBC will set the basis for the Review team's position that *'Effective and stronger governance of the national biosecurity system requires a strong mandate, strong leadership, a sound strategy, and a finely tuned and focused set of supporting arrangements'*

We note that Figure 7 outlining the 'proposed governance model' for the national biosecurity system abolishes the Marine Pest Sectoral Committee with no explanation of where the aquatic sector will now be considered. This gives the aquatic industry further indication that we are being overlooked at best or completely ignored in preference to assigning priority to terrestrial animals and plants with the resultant lack of influence over the process.

We would strongly recommend that the Aquatic Animal Health Committee and MPSC be retained with inclusion of aquatic animal industry representation.

Draft recommendation 27 reads: *'The NBC and the Industry and Community Advisory Committee, in consultation with other key stakeholders, should revise the National Framework for Cost Sharing Biosecurity Activities to enable its practical application.'*

Draft recommendation 28 reads: *'The NBC, with key industry and non-government partners, should agree uniform and fully inclusive categories of funding activity for the national biosecurity system.'*

Draft recommendation 29 reads: *'The IGAB should include an ongoing commitment to the funding stocktake, with governments publicly reporting their expenditure and the high-level stocktake results under uniform and fully inclusive categories.'*

If included as members of the NBC, industry would have the capacity to directly influence the activity cost arrangements through being involved in decisions around setting priorities and driving efficiencies through consideration of activity delivery (as discussed immediately above). This provides incentive to take greater responsibility in resourcing discussions. If the discussions are merely about how to split up the cost of a pie, where someone else has decided the flavour, the ingredients and the size of the pie from year to year, you immediately create disincentive.

Draft recommendation 30 reads: *'All governments should review their current biosecurity expenditure, with a view to redirecting funding into areas that return the highest yields to farmers, industry and the community. This approach will require a planned and coordinated strategy of engagement and communication.'*

Industry invests funding through FRDC for a large quantum of biosecurity related RD&E. Unfortunately the majority of this investment is in responding to failures in the biosecurity at Australia's international border and hence falls into the area described in the report as Asset Based Protection. Balancing this investment so more funds were invested in Prevention and Surveillance RD&E would be a priority. However, there is no clear adoption and impact pathway for RD&E invested in fishing and aquaculture biosecurity prevention. Having a clear understanding of the priorities and who would be responsible for implementing the RD&E outputs would address this.

Feedback Request 5 reads: *'The Review Panel seeks feedback on the following options to ensure a more rapid-response to an exotic pest or disease incursion:*

Option 1: Cost-sharing arrangements should provide for four weeks of monitoring, assessment and preliminary control strategies, while an overall assessment is conducted on the possibility of successful eradication.

Option 2: Cost-sharing arrangements should include a default funding arrangement for when decisions cannot be quickly reached about the success or otherwise of an eradication program.'

The fishing industry and aquaculture industry supports either option in this recommendation as recent delays in acting on the White Spot Prawn disease outbreak appears critical to the eventual impact on the prawn aquaculture and now wild stock prawn industries. The response from government to the farmed sector was quick but their response to wild harvest prawn fisheries was less so attributable to the non-existence of protocols for this sector. There is no cost sharing arrangement in place and government is responding as best it can and keeping industry informed.

Industry has had little say over how the response is managed.

Draft recommendation 33 reads: *'The emergency response deeds for aquatic animals and exotic production weeds should be finalised within 12 months.'*

Agreement on the aquatic animal EADRA remains contingent of the government providing the ability for the Industry to forgo its "cost share" when either:

- (a) the government is largely responsible for the incursions (ie industry is remote from the incursion);
- (b) the incursion is demonstrably the result of a third party and the Industry is remote from the incursion; or
- (c) the incursion is of public interest (eg native species) to the extent that it is equitable for government to take up most of the cost (NEBRA - type argument)

We would also comment that in the context of the aquatic sector the NEBRA it will never be triggered:

- The NEBRA is only about eradication, so in the aquatic space where eradication is unlikely it will never be triggered;
- The cost sharing arrangements are such that states are incentivised not to have it triggered unless the incursion is likely to affect them;
- Monitoring and surveillance is poor. Industry is essentially the sentinels and so the Aquatic Deed will always be triggered before NEBRA because animals on aquaculture farms will be succumbing.

Concluding Comments

As has been outlined in this submission biosecurity is very important to the aquatic sector, both the commercial fishing and aquaculture industry and the environment across freshwater, estuarine and marine. The Draft Report clearly sets out that the pressures will continue to grow with increasing globalisation and world trade.

The aquatic animal sector needs to be explicitly recognised in the national biosecurity system given the unique situation that the aquatic environment is an extremely difficult environment to manage with respect to biosecurity. Once undesirable organisms get a hold in the aquatic environment they are almost impossible to eradicate or contain.

The IGAB aim sought to build relations with industry and community groups, but it failed to involve them in its development.

Our industry supports the proposal to introduce a specific process, inclusive of all the parties involved, to profile, plan and consider funding for each national priority pest and disease. However in our view the involvement of parties other than government must be through explicit, formal arrangements at decision making levels.

We support that proposed governance structures that should provide the National Biosecurity Committee (NBC) with greater autonomy but our support is predicated on inclusion of representatives of industry and the community as 'members' on the NBC in their own right.