



20 February 2017

Intergovernmental Agreement on Biosecurity Secretariat  
Department of Agriculture and Water Resources  
GPO Box 858  
Canberra City ACT 2601

Dear Intergovernmental Agreement on Biosecurity (IGAB) Review Panel (the Panel),

WILDLIFE HEALTH AUSTRALIA (WHA) SUBMISSION: IGAB REVIEW DRAFT REPORT

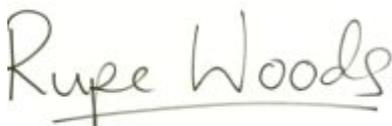
Please find attached a submission to the Panel on the IGAB Draft Report regarding wildlife health and environmental biosecurity.

We have structured our submission to where we feel we can contribute to the specific requests for feedback contained within the report relevant to wildlife and the environment. Some general comments around conclusions within the section of the report that deals with environmental biosecurity are also included, as well as some background information on Wildlife Health Australia (WHA).

The document is excellent and will move us forward. However, a challenge with reviews such as these is that the forest can become lost for the trees. For example, the necessity for ongoing surveillance to better know whether an issue is truly exotic seems to be lost in the detail. It is important that this be emphasised in the document, reflected in the IGAB, and be a cornerstone of our biosecurity arrangements going forward. **Many of the issues and challenges identified by the Review can be addressed by focusing on a commitment by all parties to improved and on-going surveillance.**

We are happy to discuss this submission with you face to face if needed and I hope that our submission helps you with this important work.

Best Wishes,



Rupert Woods AM  
CEO, WHA

# WILDLIFE HEALTH AUSTRALIA (WHA) SUBMISSION: INTERGOVERNMENTAL AGREEMENT ON BIOSECURITY REVIEW DRAFT REPORT

## REQUESTS FOR FEEDBACK

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### Research and innovation

**Feedback request 3** 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.

**WHA comment** Establishing a new, stand-alone entity would be costly. Addressing cross-sectoral biosecurity R&I within an existing RDC (for example, the Rural Industries RDC) is the preferred option.

Funding could come from a combination of the proposed levy funding model on incoming passengers, redirection of a proportion of both Australian Government matching funds and industry specific levy monies from within the existing RDC system. The preferred model is to utilise both streams, rather than one or the other. Including both streams recognises risk makers and beneficiaries.

Any cross-sectoral framework should also recognize that some areas (for example wildlife, the source of most emerging diseases, vertebrate pests and key threatening processes) may again “fall between the cracks” and remain a risk area, unless dedicated support is provided.

### Funding our national system

**Feedback request 5** 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.

**WHA comment** There is an Option 3: 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.

Decisions around response require more than an assessment of eradicability, they also require consideration of benefit-cost and risk assessment. For wildlife, this information may be difficult to determine and require a period greater than the four weeks stated in Option 1. As it is written, Option 2 (though I'm sure it would not happen), allows for a "no action"-type arrangement. For this reason, Option 3 is the most appropriate: it allows controls to be put in place whilst information gathering to enable more informed decision making. This approach would also assist in addressing a gap area of concern to stakeholders that is not currently covered by the NEBRA. The EADRA contains a similar facility.

A consideration that appears to become lost in the discussion is the necessity for ongoing surveillance to better know whether the issue is truly exotic. It is important that this is emphasised in the document, reflected in the IGAB, and be a cornerstone of our biosecurity arrangements going forward. Many of the issues and challenges identified by the Review can be addressed by focusing on a commitment to improved and on-going surveillance.

## OTHER COMMENTS

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### Environmental biosecurity – The challenge with wildlife

**Eradicability** The concept of eradicability as a key criterion for action is pervasive throughout the document. The simple reality for many important wildlife diseases is that eradicability cannot be achieved without eradication of the host: something that may not be possible with endangered species, or because the necessary tools are not available. We agree that "governments need to be concerned about the potential to inappropriately allocate funds to eradication programs that have little or no chance of success (page 35)". However, the IGAB needs to be able to account for response and management of those diseases where there is public expectation that "something is done", but control is the only option. This will be for the majority of wildlife diseases.

**Inclusion of the precautionary principle** The decision to not include the precautionary principle in arrangements is presented on page 39 of the Draft Report:

"To provide clearer evidence of the IGAB's commitment to environmental biosecurity, the inclusion of the precautionary principle in the IGAB was suggested in submissions. This issue—the application of the precautionary principle, as spelt out in the EPBC Act, when considering biosecurity risks—was also reviewed by the 2008 Beale Review. The Beale Review Panel concluded that, while it was

sympathetic to the idea, the precautionary principle, as spelt out in the EPBC Act, was “unlikely to be consistent with the requirements of the SPS Agreement” and its application might lead to Australia being in breach of its obligations under the Agreement, leaving Australia open to challenge”.

For its dissemination and defense, this conclusion will require translation into plain English for the Public, for whom application of the precautionary principle would seem a central, logical and in fact, mandatory part of any arrangements for responding to biosecurity incidents. The SPS Agreement, and the reason it trumps the precautionary principle as spelt out in the EPBC Act, will also need to be clearly articulated. The inability to activate a response based on precautionary principle would seem counter intuitive and at odds with the intent of the arrangements.

**Compartmentalisation** The concept of compartmentalisation and its use in management of environment diseases seems lacking. In fact, compartmentalisation does not appear to be mentioned in the Review. Deployment of this tool presents some challenges and will need to be thought through when applied to environment. It is, however, useful in the case of wildlife diseases, and clarification around its deployment and use within the broader IGAB framework for managing environmental pests and diseases should be considered.

**Remaining gap areas – The problem with wildlife and a potential solution** Overall the recommendations are very good, and will significantly improve the way environmental biosecurity is managed. However, they will still not address the gap area for wildlife where national significance criteria, as presented in the NEBRA, cannot be met. Either the IGAB needs to account for wildlife as a special case, or NEBRA does. In moving forward, we cannot afford to view each instrument in isolation because we run the risk of neither addressing the very common scenarios of the inability to eradicate, or unknown eradicability. Should a decision be made to not address this special case, then alternatives will need to be found. The Chief Environment Biosecurity Officer could be tasked with this activity, but another set of arrangements would then be required. It seems logical to try to deal with this issue under the current reviews, either in the IGAB or through NEBRA. A simple solution is to allow the decision making bodies the flexibility to initiate a response, and transition to management, in the absence of the ability to eradicate for wildlife as a special case. Language used as criteria for consideration of diseases within the Aquatics List sets a precedent and could be utilised: “And any considered to be significant by all members of AHC [insert new or appropriate sectoral committee here]”. Inclusion of such a criterion would also allow precautionary principle to be applied, whilst maintaining a transparent, consistent and evidence-based approach.

## ABOUT WILDLIFE HEALTH AUSTRALIA

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Wildlife Health Australia (WHA) is the peak body for wildlife health in Australia and operates nationally. The head office is in Sydney, NSW.

WHA activities focus on the increasing risk of emergency and emerging diseases that can spill over from wild animals and impact on Australia's trade, human health, biodiversity and tourism. We provide a framework that allows Australia to better identify, assess, articulate and manage these risks. We provide the framework for Australia's general wildlife health surveillance system.

Our mission is to develop strong partnerships to better manage the adverse effects of wildlife diseases on Australia's animal health industries, human health, biodiversity, trade and tourism.

WHA directly supports the Animal Health Committee (AHC), Animal Health Australia (AHA), the Animal Health Policy Branch and the Office of the Chief Veterinary Officer (OCVO) within the Australian Government Department of Agriculture and Water Resources (DAWR) and Australian governments in their efforts to better prepare and protect Australia against the adverse effects of wildlife diseases. It provides priorities in wildlife disease work, administers Australia's general wildlife disease surveillance system as well as facilitating and coordinating targeted projects. Wildlife health intelligence collected through the National Wildlife Health Information System (eWHIS: <http://www.wildlifehealthaustralia.com.au>) administered by WHA is provided to members of AHC and the Australian Government DAWR, and Departments of Health (DoH) and Environment (DoEE), on issues of potential national interest, potential emerging issues and significant disease outbreaks in wildlife. The information is provided in line with the agreed policy for data security. WHA supports the NAHIS by provision of quarterly reporting and the ACVO by hosting the OIE Wildlife Health Focal Point.

WHA is administered under good organisational governance principles. An elected management committee, chaired by an appointment from DAWR, and including an AHC representative provides strategic direction and advice to a small team, which oversees the running of WHA. It is important to note that WHA involves almost every agency or organisation (both government and NGO) that has a stake or interest in wildlife health issues in Australia. There are over 35 member organisations and more than 600 wildlife health professionals and others from around Australia and the rest of the world who have an interest in diseases with feral animals or wildlife as part of their ecology that may impact on Australia's trade, human health and biodiversity.

More information on WHA is available at: <http://www.wildlifehealthaustralia.com.au>.