

Feedback on Draft National Biosecurity Statement

February 2018

General comments

The following comments provide feedback to the draft National Biosecurity Statement (Attachment A) first proposed in the report *Priorities for Australia's Biosecurity System*¹ in June 2017 and circulated for public comment at the national biosecurity roundtable and the environmental biosecurity roundtable meetings in November 2017.

We agree with most of the draft statement. However, substantial changes are needed to the roles and responsibilities table to reflect the diversity of the environmental NGO sector and their biosecurity contributions. We have also recommended changes to the principles and some other sections to clarify or strengthen statements, mostly those relevant to environmental biosecurity.

Preamble

Draft: *Australia's biosecurity system plays a critical role in protecting the quality of life of all Australians and our place on the world stage.*

Comment: This opening statement does not encompass the natural environment except as it supports people's quality of life. We're not clear what is meant by 'our place on the world stage'. We have left it in the following proposed revision, but think it would be better omitted or revised.

Proposed revision: Australia's biosecurity system plays a critical role in protecting Australians' quality of life, our place on the world stage, and our species and ecosystems, most of which are unique to Australia.

Draft: *Our first-class produce is safe and available to domestic and international consumers, and we have access to premium international markets. Australia remains free from many of the major animal, plant and environmental pests and diseases found in other parts of the world.*

Comment: This is not an accurate reflection of the situation for environmental pests and diseases. Australia is one of the worst invaded nations in the world and the majority of our many animal extinctions have been caused by invasive species.² We propose (a) focusing the

¹ Craik, W, Palmer, D & Sheldrake, R 2017, *Priorities for Australia's biosecurity system*, An independent review of the capacity of the national biosecurity system and its underpinning Intergovernmental Agreement, Canberra.

² Low T. 2017. Invasive species: A leading threat to Australia's wildlife. Invasive Species Council. Available from <https://invasives.org.au/wp.../Invasive-species-A-leading-threat-to-Australias-wildlife.pdf>
Booth C. 2018. Land clearing versus invasive species: Which is the biggest threat? Available from <https://invasives.org.au/blog/land-clearing-vs-invasive-species-biggest-threat/>

statement just on agriculture and (b) rolling into the preceding sentence. Also, most readers will assume that ‘animal’ and ‘plant’ pests and diseases refer to all animals and plants, not just those used in agriculture, so preface this with ‘agricultural’ to make clear what is meant.

Proposed revision: Free from many major agricultural pests and diseases found in other parts of the world, Australia’s produce is first class and safe and has access to premium international markets.

Draft: *Our diverse and unique ecosystems, and native fauna and flora are of immeasurable value.*

Comment: This is a good statement. We propose adding a point about the high biodiversity values of Australia in terms of endemism (see Chapman 2009).³

Proposed revision: Our diverse and unique ecosystems, and native fauna and flora – most of which are found nowhere else – are of immeasurable value.

Principles

Recommended additional principle

Comment: We strongly recommend that a principle on the benefits of focusing strongly on prevention and early action be added.

Proposed addition: Prevention and early action – generally the most effective approaches to biosecurity – are given high priority.

Principle 2

Draft: *In practical terms, zero biosecurity risk is unattainable.*

Comment: This is a statement of fact more than a principle, and it is not a contest fact. We recommend it be omitted. It is odd to emphasise it so much (as the second principle), while not even mentioning the other part of Australia’s ALOP, ie very low risk.

Proposed revision: Omit

Principle 3

Draft: *Biosecurity investment prioritises the allocation of resources to the areas of greatest return.*

Comment: It is important to distinguish between principles that apply to governments and those that don’t. Principle 3 should definitely apply to governments – for public money – but not necessarily to non-government parties, who will justifiably allocate resources also on the basis

³ Chapman AD. 2009. Numbers of Living Species in Australia and the World. 2nd edition. Australian Government.

on their own interests or to areas that have a lesser return on a national basis but are important to them for other reasons. A similar issue applies to principle 5.

Proposed revision: Public resources for biosecurity are allocated to the areas of greatest return.

Minor comments

ESD consists of more than one principle. Add 's' to 'principle' in principle 9.

Principles 7 and 8 are framed in terms of 'should', while the others are declarative statements. All should be expressed in a consistent way.

There are some redundant words – eg. 'further' in principle 7, 'quality' in principle 8. Principle 4 could be better expressed as '...undertaken in a ... risk-managed way'.

Strategic intent

Overall, this section lacks commitment and ambition. 'Effective national biosecurity' is not a compelling vision. Normally, a vision explains the state of affairs we want to achieve. It would be best to turn most of the statements in this section into this form – effective biosecurity is the means to what ends?

For biosecurity risks

Draft: *Reduce the likelihood of harmful exotic pests and diseases, entering, establishing or spreading*

Comment: What is the baseline referred to here? Reduce from what and by how much? At the very least, the statement should reflect the ALOP.

Proposed revision: Reduce to a very low level the likelihood of harmful exotic pests and diseases, entering, establishing or spreading.

For landscapes

Draft: *Ensure nationally significant pests, weeds and diseases already established are suppressed or managed.*

Comment: This objective is too weak and narrow. It needs expanding to include the marine environment and to encompass harmful species beyond those recognised as 'nationally significant'. Note that many significant invasive species are managed only in certain locations due to the impracticality of landscape-wide control. It would be best to turn it into a positive statement about what we are ultimately striving to achieve – ie. protection from invasive species.

Proposed revision: For landscapes and seascapes: Protect Australian ecosystems, species, people and businesses from the impacts of invasive species.

Shared responsibility

Draft: ... *the cooperation, investment and actions by all governments, industry bodies, exporters and importers, farmers, miners, tourists and the broader community.*

Comment: This list should acknowledge the important role of all land managers, including traditional owners and conservation land managers – not just farmers and miners. It should also include those who transport goods and those who interact with the marine environment (these haven't been included in the revision).

Proposed revision: ... the cooperation, investment and actions by all governments, industry bodies, exporters and importers, land managers, tourists and the broader community.

Roles and responsibilities

One major category missing from this table (and the entire document) is biosecurity researchers and research bodies. Their very important role should be acknowledged even if it is not detailed in the table.

Make each point grammatically consistent – eg. start all points with a verb.

State and territory governments

Draft: *Supporting international trade and market access negotiations and complying with international obligations. Negotiating and facilitating domestic trade*

Comment: Although there are biosecurity issues associated with these roles, we question whether it is appropriate to include trade work as a biosecurity responsibility. It doesn't fit with the definition of biosecurity on page 1. At the very least, the specific biosecurity aspects of these roles should be mentioned rather than the broader trader work.

Proposed revision: Omit.

Draft: *Regulating the keeping of plants and animals that pose significant risks*

Comment: This should also include regulating the selling of these plants and animals.

Proposed revision: Regulating the keeping and trading of plants and animals that pose significant risks

Roles and responsibilities – NGOs

Comment: What NGOs does the column refer to? Presumably 'environmental NGOs'. This should be specified. This category includes a wide range of groups making a wide range of contributions to biosecurity, which should be reflected in an expanded list of roles and responsibilities:

- Advocacy groups – eg. Invasive Species Council, WWF-Australia, Australian Network for Plant Conservation, Island Conservation – that focus in part or mainly on policy reform and public education. Their contribution can also include on-ground work such as the eradication projects undertaken by Island Conservation or technical work such as the prioritisation project undertaken by ISC (with Monash University).
- Representative bodies – eg. Ecological Society of Australia, weed societies – that represent the interests of their members, including advocating or advising on biosecurity policy reform.
- Conservation land managers – eg. Bush Heritage, Australian Wildlife Conservancy – that undertake management of invasive species on protected areas, as well as some advocacy and policy advice.
- NRM, land rehabilitation and species recovery groups – eg. Bushcare, NRM and Landcare groups, Greening Australia, trusts and land conservancies – eg. Trust for Nature (Victoria) and Tasmanian Land Conservancy, bushcare groups – that are involved in planning, advising, and on-ground projects to manage invasive species.

Note, there is a lot of overlap in these categories. For example, the main role of the Invasive Species Council is advocacy for biosecurity reform and public education, but we also do projects such as a joint project with Monash University on prioritisation of insect invasion risks, surveys of smooth newts, yellow crazy ant eradication in Townsville and financial support of rat control on Norfolk Island.

Proposed additions

Add the following additional roles and responsibilities (most are slight modifications of those listed in the industry column):

Advocating biosecurity reforms and leading biosecurity initiatives in the interests of the natural environment. [This point is essential.]

Contributing to the surveillance network for new and established pests, weeds and diseases.

Promoting partnerships between governments, industry and the community

Proposed revisions

Draft: *Managing established pests, weeds and diseases on land under its responsibility*

Comment: NGOs often manage invasive species on land or sea that it is not responsible for, eg. in reserves, on public land, on private land with threatened species.

Proposed revision: Managing pests, weeds and diseases for conservation.

Draft: *Promoting awareness of Australia's biosecurity requirements to their members. Disseminating biosecurity information to industry, landholders, the community and other stakeholders*

Comment: These statements could be combined. NGOs do a lot of public awareness raising, not just to their members.

Proposed revision: Promoting awareness of biosecurity obligations and best practices to their members and the public.

Draft: *Engaging with biosecurity specialists and/or biosecurity expert groups*

Comment: We don't know what is meant by this. What is the purpose of the engagement?

Proposed revision: Omit

Draft National Biosecurity Statement

Preamble

Australia's biosecurity system plays a critical role in protecting the quality of life of all Australians and our place on the world stage. Our first-class produce is safe and available to domestic and international consumers, and we have access to premium international markets. Australia remains free from many of the major animal, plant and environmental pests and diseases found in other parts of the world. Our diverse and unique ecosystems, and native fauna and flora are of immeasurable value. Our natural, social and urban amenities ensure we remain a highly desirable destination for tourists and other visitors.

These economic, environmental and social benefits and assets and Australia's reputational advantages—worth many billions of dollars to our economy each year—rely on a strong and focussed national biosecurity system.

Biosecurity is as critical a basic service as health, education and other border protection services, including customs and defence, alongside which the biosecurity system works.

Maintaining a strong and effective national system into the future requires the cooperation and input of all system participants—all tiers of Australian government, industry and the community. Biosecurity is not the sole responsibility of any one participant or government—all system participants must work with a common focus taking responsibility for matters under their control.

Purpose

This statement affirms the commitment of sponsoring parties to an effective national biosecurity system and collaborative action in preventing, preparing for and responding to national biosecurity risks. This commitment is embodied in the principles, strategic intent, roles and responsibilities, commitments and accountabilities outlined in this statement.

National biosecurity principles

Sponsoring parties and their collective activities are guided by agreement to the following principles:

1. Biosecurity is a shared responsibility among all system participants.
2. In practical terms, zero biosecurity risk is unattainable.
3. Biosecurity investment prioritises the allocation of resources to the areas of greatest return.
4. Biosecurity activities are undertaken according to a cost-effective, science-based and risk-managed approach.
5. Governments contribute to the cost of risk management measures in proportion to the public good accruing from them. Other system participants contribute in proportion to the risks created and/or benefits gained.
6. System participants are involved in planning and decision making according to their roles, responsibilities and contributions.
7. Decisions governments make in further developing and operating our national biosecurity system should be clear and, wherever possible, transparent.
8. The Australian community and our trading partners should be informed about the status, quality and performance of our national biosecurity system.
9. Australia's biosecurity arrangements comply with its international rights and obligations and with the principle of ecologically sustainable development.



Biosecurity is the management of risks to the economy, the environment and the community, of pests and diseases entering, emerging, establishing or spreading.

Australia's biosecurity system involves measures applied offshore, at the border and onshore by a broad range of participants.

Strategic intent

Our shared vision

Effective national biosecurity

Our shared goals

Minimise the impact of pests and diseases on our economy, environment and community
Enable trade and the movement of plants, animals, and products, and the movement of people

Our shared objectives

For biosecurity risks:

Reduce the likelihood of harmful exotic pests and diseases, entering, establishing or spreading

For incursions:

Prepare and effectively respond to exotic pests and diseases that may enter or establish

For the market:

Enable trade and market access
Sustain tourism appeal

For landscapes:

Ensure nationally significant pests, weeds and diseases already established are suppressed or managed

Our shared commitments

We understand, accept and will act on our respective roles and responsibilities

We will work and act in partnership to maintain Australia's Appropriate Level of Protection (ALOP)*

We will work collaboratively to build our capacity and capability to prepare for and respond to biosecurity risks

We will collaborate on data, information and intelligence sharing

We will help foster an innovation culture, sharing practices shown to be effective

[further commitments subject to consultation]

* The Parliament of Australia has, consistent with our international obligations, legislated to maintain a level of protection considered appropriate for life or health within our borders—the Appropriate Level of Protection (ALOP). Australia's legislated ALOP provides for a high-level biosecurity standard aimed at reducing risk to a very low level, but not to zero.

Shared responsibility

Everyone in Australia is responsible for biosecurity. Australia’s biosecurity system does not exist as a single physical or legal entity. It is built on a core principle of ‘shared responsibility’—the cooperation, investment and actions by all governments, industry bodies, exporters and importers, farmers, miners, tourists and the broader community. For governments, the sharing of responsibility occurs through a cooperative partnership under the Intergovernmental Agreement on Biosecurity (IGAB), which was signed by Australia’s then Prime Minister, Premiers and Chief Ministers (First Ministers) in 2012.

Shared responsibility means everyone takes responsibility for biosecurity matters under their control. Everyone has an obligation to take action to protect Australia from pest and diseases.

(IGAB Review 2017)

Roles and responsibilities

Agreeing roles and responsibilities of the key participants in the national biosecurity system is a key step in realising shared responsibility. Shared responsibility does not mean equal responsibility. Sponsoring parties to this national statement have endorsed the general, high-level roles and responsibilities as detailed in Table 1 and have committed to adopt and apply them, consistent with their respective charters and capacities. It is recognised sponsoring parties should consult with each other.

Governance and accountability

Sponsors of this national statement include Australian governments (Australian, state and territory and local government) and a range of peak industry and community bodies. A full list of sponsoring parties can be found at [web link]. This list will be updated as required.

Sponsoring parties will utilise existing national governance arrangements to monitor implementation and impact of the national statement.

The IGAB identifies the governance arrangements and accountabilities for governments, including the oversight responsibilities of agriculture ministers, senior departmental officials and the National Biosecurity Committee. The IGAB can be found at <https://www.coag.gov.au/content/intergovernmental-agreement-biosecurity>

For agricultural industries and their partners, Animal Health Australia and Plant Health Australia will oversight and monitor implementation of the national statement, including via relevant emergency response deeds and arrangements.



All sponsoring parties also commit to public reporting on their actions in support of the national biosecurity system, consistent with their roles and responsibilities. Sponsoring parties also agree to assess the effectiveness of the national statement in guiding cooperative national efforts as part of national roundtables held by the Australian Government agriculture department or successor agencies.

The statement will be reviewed by sponsoring partners at least ten-yearly intervals.

Roles and responsibilities of national biosecurity system participants

| Australian Government | State and territory governments | Local government (or jurisdiction equivalent) | Industry (businesses or peak bodies) | General community | NGOs |
|--|---|--|---|--|--|
| <p>Matters relating to the national border, including development and enforcement of quarantine</p> <p>Assessing potential risks associated with imported goods</p> <p>Negotiating and facilitating international trade and market access, including sanitary and phytosanitary conditions and certification</p> <p>Monitoring and reporting Australia's pest and disease status to meet international obligations</p> <p>Incorporating biosecurity risks into threat abatement and recovery plans for threatened species and ecological communities</p> <p>Fulfilling obligations, including those under the WTO, the Convention on Biological Diversity and other international agreements and strategies</p> <p>Promoting and developing biosecurity partnerships between government, industry (including the full supply chain) and the community, including for consultation, awareness raising, information dissemination and sharing leading biosecurity practice</p> <p>Managing pests, weeds and diseases on land under its responsibility</p> <p>Maintaining capacity to prepare for, detect and respond to exotic pest and disease incursions, including training exercises</p> <p>Responding to and controlling detections of exotic pests or diseases that have passed through border controls and are directly related to an imported good or a container carrying an imported good</p> <p>Providing national leadership for strategic biosecurity issues, including responses to exotic pests and diseases and management of nationally significant established pests, weeds and diseases</p> | <p>Biosecurity within their borders, including enforcement actions and regulatory interventions</p> <p>Supporting international trade and market access negotiations and complying with international obligations</p> <p>Negotiating and facilitating domestic trade</p> <p>Monitoring pest and disease status to meet domestic and international obligations</p> <p>Maintaining capacity to prepare for, detect and respond to exotic pest and disease incursions, including training exercises</p> <p>Undertaking surveillance and diagnostics to support early detection and diagnosis of exotic pests and diseases</p> <p>Promoting and developing partnerships between all governments, industry (including the full supply chain) and the community, including for consultation, awareness raising, information dissemination and sharing leading biosecurity practice</p> <p>Managing eradication and containment programs for nationally agreed and other pest and disease incursions</p> <p>Undertaking biosecurity activities on public lands under their jurisdiction and on private land under certain circumstances</p> <p>Supporting landholders and the community to manage established pests, weeds and diseases</p> <p>Managing established pests, weeds and diseases on land under its responsibility</p> <p>Regulating the keeping of plants and animals that pose significant risks</p> | <p>Managing local and regional incursion response programs</p> <p>Regional collaboration between local councils to deal with regional biosecurity issues</p> <p>Working in partnership with all governments, industry and the community</p> <p>Promoting reporting of new or unusual pests, weeds and diseases</p> <p>Implementing state-based pest and weed management strategies and/or plans</p> <p>Providing support and information to the local community on biosecurity pest, weed and disease management</p> <p>The management of pest and weed species on local government-owned land</p> | <p>Awareness and understanding of Australia's biosecurity system and its requirements</p> <p>Building risk mitigation measures into normal industry practices, including through on-farm biosecurity programs</p> <p>Complying with international and domestic obligations and regulations</p> <p>Maintaining capacity to prepare for, and respond to, identified exotic pests and diseases</p> <p>Promoting reporting of new or unusual pests, weeds and diseases</p> <p>Contributing to the surveillance network for exotic and established pests, weeds and diseases</p> <p>[Peak body] promoting partnerships between governments, industry and the community</p> <p>[Peak body] leading collective action to manage pests, weeds and diseases on behalf of their members</p> <p>[Peak body] advocating biosecurity and leading biosecurity initiatives in the interest of their members</p> <p>Managing declared and other established pests, weeds and diseases on private lands</p> <p>Integrate biosecurity measures into retailers' supply chain assurance and traceability programs</p> | <p>Awareness of Australia's biosecurity requirements</p> <p>Awareness of Australia's biosecurity obligations, including for importing goods and domestic and international travel</p> <p>Reporting new or unusual pests, weeds and diseases</p> <p>Contributing to community action to manage biosecurity risks and protect valuable public assets, such as parks and reserves</p> <p>[Landholder and/or manager] building biosecurity risk mitigation measures into normal practices</p> <p>[Landholder and/or manager] managing declared and other established pests, weeds and diseases</p> | <p>Promoting awareness of Australia's biosecurity requirements to their members</p> <p>Disseminating biosecurity information to industry, landholders, the community and other stakeholders</p> <p>Engaging with biosecurity specialists and/or biosecurity expert groups</p> <p>Promoting reporting of new or unusual pests, weeds and diseases</p> <p>Managing established pests, weeds and diseases on land under its responsibility</p> <p>Working with local governments (and other governments, as required), industry, landholders and the community to manage established pests, weeds and diseases</p> <p>Developing community biosecurity awareness programs</p> |