



# Draft National Biosecurity Strategy

Submission by the  
Invasive Species Council

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## Document details

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## About the Invasive Species Council

The Invasive Species Council was formed in 2002 to advocate for stronger laws, policies and programs to keep Australian biodiversity safe from weeds, feral animals, exotic pathogens and other invaders. It is a not-for-profit charitable organisation, funded predominantly by donations from supporters and philanthropic organisations.

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## Introduction

Invasive species are driving massive loss of the natural world, globally and in Australia. The projections predict the pressures driving these impacts will only increase. A stronger, risk-based biosecurity system that seeks to involve all Australians is essential to limit this loss and move Australia towards ecological recovery.

The Invasive Species Council is wholeheartedly committed to a stronger national biosecurity system. We are willing to both build greater awareness and support amongst our environmental and community constituents and work with others seeking similar aims.

A national biosecurity strategy is a long-needed document to help explain the system, to involve others in the system and to drive the changes needed to create a more effective biosecurity system. There needs to be major changes to a biosecurity system under extreme stress that is not fully able to do the job it was designed to do.

Our desire is for the national strategy to drive the biosecurity system towards a more effective path that better protects Australia's national environment, its people and their livelihoods and those things that all Australians value.

It is important to remember that the goal is to build the stronger biosecurity system and not simply finalise a national strategy. The preparation and implementation of the strategy is the opportunity to engage with and seek to involve all Australians, and that must not be forgotten. We fear that after the strategy is adopted that government will move on, the needed changes will not be made and industry and community representatives and the broader public will remain excluded and uninvolved. That has been the risk of this rapid process and this outcome must be avoided at all costs.

We commend the team developing the national biosecurity strategy for their genuine attempts to incorporate feedback from community and environmental stakeholders that have resulted in changes from early internal drafts. Despite the speed of the process, there has been good engagement.

We also appreciate the opportunity to be represented on the reference group which has allowed for early and ongoing input into the development of the strategy. It is clear that the views of the reference group were taken seriously.

## Summary

Broadly the strategy is supported. It correctly identifies the purpose and priority areas for Australia's biosecurity system and initial actions. It seeks a stronger risk-based biosecurity system underpinned by good science, involving all those with an interest in the outcomes, in particular the community and environmental interests.

In summary, the following key changes are recommended:

- Specific measures added to improve the current weak efforts to prevent and respond to biosecurity risks that harm the natural environment.
- Explicit ways to involve non-government stakeholders through modified governance arrangements.

- Clarity on the process for the development of action plans and for driving the implementation of the strategy and action plans and transparently reporting progress.
- Inclusion of the Decade of Biosecurity as an initial action to drive greater involvement of more Australians.
- The vision needs to be expanded to include the protection of those aspects unrelated to people – the natural world.
- Addition of timelines for all actions.
- involvement of all Australians in the biosecurity system.

We strongly support efforts to ensure that there is sustainable long-term funding as this is central to the operation of the biosecurity system.

These and other points are expanded below.

## Detailed comments

### Vision – page 6

We support the purpose, but it should be broadened out so that it includes the natural world, those aspects of Australia that are unique and unrelated to our ‘way of life’ such as Australia’s native plants and animals. Obviously those aspects relating to people and their life are important, but so too is the life of other living things, in particular those aspects of the natural world only found in Australia.

### Shared purpose – page 6

We support the purpose. It is simple and sums up the purpose of the biosecurity system. We strongly support the reference to a risk-based system underpinned by science.

### 6 Priority Areas - page 7

We support the 6 priority areas.

In particular we support:

- The words ‘so everyone understands its importance and plays their part’ in the ‘Shared biosecurity priority action.’
- The active language and the mention of ‘long-term’ for the ‘Sustainable investment’ priority action. Sustainable funding at all levels of government and all stakeholders is central to the operation of the biosecurity system.
- Mention of a risk-based system in the ‘Integration supported by technology, research and data’ priority area.
- The emphasis on strong partnerships, networks and an enhanced culture of biosecurity action.

## We will take action – pages 8-9, 30-33

There needs to be explicit reference in the strategy to the Decade of Biosecurity initiative as an initial action. A meeting held on 15 March 2022 of all NBC representatives and the eight proposing organisations (ISC, Animal Health Australia, Plant Health Australia, Centre for Invasive Species Solutions, National Farmers' Federation, NRM Regions Australia, National Landcare Network and Landcare) endorse the Decade of Biosecurity project plan with minor modifications. A collaborative working group will be established in the next month to oversee the implementation and the initiative will be launched during 2022.

There needs to be more explicit action to improve the identification and management of environment risks. This is a major weakness in the current system. Simply seeking the greater involvement of environmental agencies (while important) is one small step towards improving the situation that will not remedy this situation. This improvement could apply to the 'Shared biosecurity culture', 'Coordinated preparedness and response', 'Stronger partnerships' and 'Sustainable investment' priority areas.

There are no dates on any actions that are needed to ensure actions are timebound. This is absolutely necessary for the sustainable funding priority action.

In particular we support:

- A review of governance arrangements to include relevant stakeholders. This could be made more specific to make it clear which stakeholders are to be included. Community and environmental interested need to be more included, aligning with recommendations from the 2017 Craik biosecurity review. At present there is little formal opportunity for involvement of this important sector.
- Greater involvement of non-government stakeholders throughout.
- Greater engagement of Indigenous Australians.

## Our way forward – pages 9, 34

There is a suggestion that the initial actions will be refined 'through public consultation'. The initial actions need to be finalised quickly and then a process determined for further implementation action. It is presumed that the consultation is that currently under way.

There is reference to the development of action plans. There needs to be greater clarity on this process to ensure resources are allocated to prepare and implement the action plans, and this work occurs according to a clear timetable, involving industry and community parties.

Relying on NBC to oversee the strategy's implementation (and presumably the development and implementation of resulting action plans) is not appropriate without additional measures to improve transparency and involve non-government parties. An ongoing process is needed to drive strategy implementation by all parties, including determine new action, and publicly report on progress throughout the life of the strategy.

## What is biosecurity – pages 10-11

Support the wording 'What is biosecurity'. It briefly sums up the breadth of the system's benefits, however the heading is not quite right. Is this the benefits and outcomes of the biosecurity system. Biosecurity is the system that achieves these stated benefits and outcomes.

Appreciate the inclusion of the value of environmental assets and impacts.

## How our biosecurity system works – pages 14-15

Support the wording and diagram. It helps explain roles within a complex system.

## Our biosecurity system in action – pages 16-17

Support the diagram.

## Examples – included throughout

There needs to be several environmental examples. At present there are none. There are four industry examples, one marine example (but does include the marine environment) and one about Torres Strait.

## Appendix – pages 38-39

Support the explicit mention of the role of peak environmental groups in the biosecurity architecture and the examples included in the graphic.

Support the reference to the national biosecurity statement.