



Consultation draft of the NSW Biosecurity and Food Safety Strategy 2022-2030

Submission by the
Invasive Species Council

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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 invasive animals, plants and diseases. It is a not-for-profit charitable organisation, funded predominantly by donations from supporters and philanthropic organisations.

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1. Introduction

The Invasive Species Council commends the development of the updated draft Biosecurity and Food Safety strategy 2022-2030 and the broad outcomes that are articulated within it. While we can understand the rationale of consolidating biosecurity with food safety into one strategy and understand the relation and influence between them, it is our view that this removes the clear and targeted focus on biosecurity that the previous strategy communicated effectively. It is our view that biosecurity should remain separate, to clearly direct and guide the actions addressing two distinct and challenging areas. This submission provides both general feedback about the strategy, as well as specific recommendations that we see could improve its usability and function such as detail on activities and elevation of environmental biosecurity. Since the draft strategy is intended to replace the previous NSW Biosecurity Strategy 2013-2021, we have used it as a baseline.

2. Recommendations

1. The previous NSW Biosecurity Strategy 2013-2021 included significantly more detail on objectives and the actions and activities that would achieve them. A similar approach would greatly enhance the draft NSW Biosecurity and Food Safety Strategy 2022-2030.
2. Elevate references to environmental threats and priorities to be as important as agricultural productivity and food safety, with clearly articulated detail on measures and objectives on how this capital will be protected under the strategy.
3. Include a goal to establish an agreement between the Department of Primary Industries and the Department of Planning and Environment, and a dedicated environmental biosecurity office (or equivalent).
4. Add a similar level of detail around governance, frameworks and roles and responsibilities from the previous strategy. The current draft does not include any of this information, which lessens the usability and relevance of the strategy as a goal and direction setting document.
5. The strategy should go into considerably more detail on how the activities under shared responsibility will be achieved, and what NSW will do to enable and support the shift.
6. NSW should re-establish this Biosecurity Advisory Committee that was abolished in 2018 as a component of the shared responsibility principle that is clear within the strategy.

7. Articulate how findings from the 2019 Audit of Biosecurity Risk Management have been incorporated into the new strategy, or how they will be achieved through its implementation.
8. We recommend NSW endorses and links with the Decade of Biosecurity initiative as a mechanism of implementation for the strategy.

3. Comparison with the previous strategy - overview

The State of Biosecurity report published May 2022 goes some way to demonstrate that significant parts of the previous NSW Biosecurity Strategy 2013-2021 were successful. It is very positive to see the investment and resourcing that has been applied by NSW to surveillance tools and innovation, and the measured increase in public and industry awareness of biosecurity. There was a direct link between the previous strategy and the NSW Invasive Species Plan 2013-2021, which was designed to support the strategy and identify key deliverables. The new strategy will also need to be supported by a new Invasive Species Plan, and associated framework for measuring success.

The previous NSW Biosecurity Strategy 2013-2021 was a much more detailed document overall, and covered environmental threats directly. The consideration of the environment for NSW was written as a high priority, second to agricultural animal and plant industries. This was a significant recognition of the importance of environmental biosecurity and its influence on biodiversity and conservation matters. It was also clear about related matters not covered by the strategy (e.g., chemical contamination from control efforts that impact on wildlife, ecosystems, and animal welfare concerns through culling or control), which was useful.

Without addressing how the new strategy builds upon its predecessor, it can appear to be presenting a very similar set of goals and objectives, without evolving with new and improved approaches to solve biosecurity problems or reduce risk.

4. How the strategy could be improved

The draft strategy objectives and activities are admirable, however they require more information to demonstrate how they will be planned and implemented, and whether there has been progress towards them to date. Throughout the draft strategy, language is used that leans towards biosecurity threats being a potential future issue for industry and productivity. Impacts (including biodiversity loss) and threats from invasive species is a subsection on page 11, however it is disappointing that these are under the heading of “emerging challenges.” These are not emerging challenges, and are the number one historical cause of extinction and decline. It is unfortunate that NSW has experienced a great deal of environmental decline and loss through invasive species incursions and establishment throughout its history. It is therefore not correct to say that Australia has avoided negative impacts to date thanks to our stringent biosecurity system. This statement may have been more related to food safety laws and regulation, rather than biosecurity action and protection, and this is another example of why combining two separate, albeit important issues together can be misleading.

Recommendation

1. The previous NSW Biosecurity Strategy 2013-2021 included significantly more detail on objectives and the actions and activities that would achieve them. A similar approach would greatly enhance the draft NSW Biosecurity and Food Safety Strategy 2022-2030.

Consideration of environmental biosecurity and outcomes

The draft includes strong references to environmental threats and priorities, and we agree with the inclusion of a value for natural capital and relevant case studies of environmental invasives. On page 6 of the previous 2013-2021 NSW Biosecurity strategy, there is an in-depth overview of environmental protection afforded by strong biosecurity. The strategy outlined the risks from large numbers of weed species and marine pests, and declines and extinctions in vertebrate wildlife caused by invasive animals. It was also good to see case studies that were relevant and critically important to conservation (myrtle rust and fox management). The case study on foxes effectively demonstrated the need for partnerships with research agencies, to promote efficient and effective control technologies for the future.

Page 24 of the draft 2022-2030 strategy on environment is improved from the previous draft that was circulated for consultation, and we commend the replacement of case studies with more relevant and priority pest species. The strategy acknowledges the importance of invasive pests as “among the biggest threats”, and in the previous section mentions an environmental value “natural capital” of \$6.413b. We suggest linking the objectives and activities to directly explain how this capital will be protected under the new strategy. Additionally, “pest animals and weeds threaten more than 70 per cent of threatened species and endangered ecological communities in NSW.” We support this statement and it is very important to include it. However, the strategy should address this very significant risk statement in its objectives and detail how it will be addressed.

The emphasis on primary industries, industry relationships, and food safety matters, in addition to a lack of specific measures and actions for environmental and community involvement, leads us to expect that community engagement under this strategy may be limited. Moreover, there is a need for an explicit agreement between the Department of Primary Industries and Department of Planning and Environment to ensure that resources, staffing and information are shared effectively, as outlined in the IGAB review under recommendation 7.

The establishment of the Chief Environmental Biosecurity Office within the Commonwealth Department of Agriculture, Fisheries and Forestry has demonstrated the benefits of a special lead office to focus on environmental biosecurity. A dedicated office within the NSW Department of Planning and Environment would be highly valuable to elevate the attention and resourcing that are needed to address environmental biosecurity threats facing NSW and Australia.

Recommendation

2. Elevate references to environmental threats and priorities to be as important as agricultural productivity and food safety, with clearly articulated detail on measures and objectives on how this capital will be protected under the strategy.
3. Include a goal to establish an agreement between the Department of Primary Industries and the Department of Planning and Environment, and a dedicated environmental biosecurity office (or equivalent).

Articulation of governance

The previous 2013-21 strategy on page 10 and 13, broadly articulated how it fit within a governance structure, with clear references to the Intergovernmental Agreement on Biosecurity (IGAB), the Emergency Plant Pest Response Deed (EPPRD), and the National Environmental Biosecurity Response Agreement (NEBRA). It covered how the strategy was designed to develop and implement management arrangements of risks, and that there were policies, operational plans that sat beneath it. The previous strategy also explored details of how response activities could be improved under these frameworks (page 30-33). None of these are mentioned anywhere in the new Biosecurity and Food Safety 2022-2030 consultation draft. Frameworks and governance are important to include in a strategy in order to provide accountability and reporting information, along with recognising that these frameworks will continue to guide and make decisions that will directly affect the success or failure of the strategy's goals.

Likewise, apart from a mention of discussions with the Australian Government, it appears that there are no clear links with the National Biosecurity Strategy 2022-2032. Articulating where these strategies support and connect with each other to promote the overarching principles would greatly enhance the new draft, and contribute to strengthening the national system.

On page 9 of the new strategy, governance is summarised as "Governance – it is often formalised, for example, through regulatory frameworks, response agreements, memorandum of understandings, and emergency management and risk management plans. It is critical for identifying roles and responsibilities and providing accountability and transparency." We agree with this statement. However nowhere in the document are these outlined in detail or explanation given on how they will support or be supported by the new strategy. Clearer articulation of how these will work as a governance framework, with some hierarchy of decision making, and accountability for the implementation of the strategy would be valuable to include in order to provide meaningful and definitive information.

While we support the principle of shared responsibility and working collaboratively as a biosecurity community, there is no clear conduit for community and environmental engagement with the government's work on biosecurity since the abolition of the NSW Biosecurity Advisory Committee in 2018 and the limited engagement with this sector. This committee would also provide the capacity to oversee the preparation of the State of Biosecurity Report with independence. The Invasive Species Council recommends NSW re-establish this committee as a component of the shared responsibility principle that is clear within the strategy.

The principle of "shared responsibility" appears to have been simplified considerably from the previous strategy, the draft 2022 version. In the previous strategy, working together with industries, communities and NGOs is detailed, with text outlining where each can play an important role to strengthen biosecurity and work together as a collective. Details on activities and roles are outlined (e.g. Page 22-23, and 26-28). The related case studies were useful in explaining how this works. In contrast, the new draft strategy appears to be addressing "shared responsibility" by divesting responsibility and actions away from government and more onto the broader community, without any defined parameters, assistance or detailed roles. While we support this concept, the strategy lacks detail about how the NSW government intends to support the greater sharing of responsibilities, and how this shift will be implemented. Additionally, there should be reference to how it will overcome roadblocks, unforeseen challenges or failures, and report success of the strategy's objectives (prepare and prevent, timely and risk proportionate responses, rapid and efficient containment, and partnerships to minimise impacts.)

Page 19 lists activities that can be done to promote and foster working collaboratively, and these are good directions and activities to achieve the goal, with the caveat that more information is required to understand what they mean and how they will be implemented, and under what governance mechanisms.

NSW DPI and other government agencies, which play an important role in prevention and surveillance, should have some kind of implementation plan to divest responsibility on these activities. Potential areas could be expertise and training, outreach, grants, or targeted funding programs. If done well, this would be a positive way of strengthening the biosecurity system and empowering non-government to drive direction setting and responses. Unfortunately, without specific involvement of the environmental agency and with community players, it is possible that industry interests alone will play the lead role and non-agricultural productivity aspects will be overlooked and not be properly supported.

Recommendations

4. Add a similar level of detail around governance, frameworks and roles and responsibilities from the previous strategy. The current draft does not include any of this information, which lessens the usability and relevance of the strategy as a goal and direction setting document.
5. The strategy should go into considerably more detail on how the activities under shared responsibility will be achieved, and what NSW will do to enable and support the shift.
6. NSW should re-establish this Biosecurity Advisory Committee that was abolished in 2018 as a component of the shared responsibility principle that is clear within the strategy.

Strategy objectives and activities

The draft strategy's four objectives are admirable. We agree that they are important and appropriate for the strategy. In general, we would like to see information on how NSW will contribute to the activities and objectives. Under each objective, the activities listed to achieve them are a good stocktake of what is currently being done, or what should be enhanced to achieve them. We note that many of the activities are transferred from the previous strategy, except without the subsequent detail on how to achieve them. This section of the new strategy would benefit from more information on each activity, as the text is not clear whether the activity exists yet or requires enhancement. The general public or non-government sectors may not be aware of activities underway and may interpret the strategy negatively. For example the activity "Effective policies, procedures, and guidelines" could indicate that NSW does not have these currently. Subsequently, and more importantly (considering the section previous on sharing responsibility), there should be an exploration of who will perform these activities, how they will be decided and implemented, and who will fund them.

- For example, on page 16 - "we will adopt innovative solutions to effectively manage future and emerging threats" is followed by activities such as "effective policies, procedures and guidelines". Does this mean that currently NSW does not yet have effective policies, procedures and guidelines? Or does it mean that work will be done to improve already effective policies, procedures and guidelines? What policies and procedures will be enhanced or created to address the objective of "Prepare and prevent"?
- On page 17 – under timely and proportionate response "secure sustainable funding arrangements" is excellent and critical to success. But what process will be used to achieve this and where will these funds be directed towards? Will it be system wide funding, or specific sectors such as agricultural sectors? Likewise, "Enhance invasive ant surveillance and response" – is excellent as yellow crazy ants are one of the most serious invasive threats and

included as a case study, but what will this look like, and how much additional resourcing will this bring to managing risks of invasive ants?

- Similar questioning can be asked of many activities in this section.

Of particular note to the Invasive Species Council is on Page 18 under the objective “Rapid and efficient containment”. This objective covers environmental outcomes through containment of priority invasive species to protect biodiversity. However, in the activities listed to achieve this objective, the only one directly relevant to protection of biodiversity and the environment is “Reduce impacts of priority invasive animal and plant species”. This is an objective, not an activity. How will NSW reduce impacts? Who will do this under the shared responsibility model, under what mechanisms will it occur, how will it be different from before? How will NSW measure its success against the strategy in the future? These activities require more detail for it to be a direction setting document that will achieve the objectives.

The draft strategy is promoting a more risk-return based model of response. Applying a heavily risk-based model can achieve lower costs for governments, with the most important matters focused on while less resourcing is expended on low-risk pathways or threats. This can work, but must be science based and iterative, rather than solely basing decisions on risk-return for industry, and there have unfortunately been cases of significant pests and diseases entering the country under a risk-return model, through "clean" or previously trusted pathways. For the environment, where the risks are not well understood and the benefits are often hard to quantify, a risk-return model is difficult to implement. Further information on how NSW intends to move in this direction under the strategy would be valuable.

We are interested to learn how NSW intends to incorporate the findings of the 2019 Audit on Biosecurity Risk Management. Within the audit findings, there are clear areas that the NSW Department of Primary Industries accepted and agreed to implement. It would be good to see these articulated as actions and directions within the new strategy, including building on what has been implemented to date from the audit.

The Decade of Biosecurity (<https://biosecurity2030.org.au/>) initiative seeks to ensure that by 2030 there is a strong understanding of biosecurity by all Australians and greater involvement in biosecurity surveillance across the country. There is a strong movement of sustainable investment mechanisms for essential biosecurity. The goal of the initiative is to actively engage all Australians in building a stronger national biosecurity system. The Decade of Biosecurity initiative could be a useful banner to raise broader awareness about biosecurity through a national collaborative approach.

We recommend NSW endorses and links with the Decade of Biosecurity initiative as part of the implementation of the strategy.

Recommendations

7. Articulate how findings from the 2019 Audit of Biosecurity Risk Management have been incorporated into the new strategy, or how they will be achieved through its implementation.
8. We recommend NSW endorses and links with the Decade of Biosecurity initiative as a mechanism of implementation for the strategy.

5. Conclusion

Overall, the new version of the strategy has good, strong objectives and messaging that we support. We are very interested in seeing the development of further information and implementation planning to achieve them. It is good to see the environment and its intrinsic value mentioned along with agriculture and human health. Unfortunately, environmental biosecurity is referred to sparingly and is placed below the priorities for industry and human health throughout the document.

Without a clear policy framework for this document and complimentary plans, the strategy reads as solely a big picture goal-setting document. While outlining good directions and objectives, it currently does not articulate how they will be achieved or measured, by who, and with what commitment or resourcing by NSW. We look forward to further engagement to address these concerns or learn more from NSW on their plans for implementing the strategy, and are available for any further discussion or clarification of these comments and recommendations. Thank you for considering our views and feedback on the draft consultation strategy.