

Submission to the National Biosecurity Strategy- Consultation Draft

24 March 2022

Mr Andrew Tongue
Co-Chair - NBC Secretariat
Department of Agriculture, Water and the Environment
GPO Box 858
CANBERRA ACT 2601

Via email: nationalbiosecuritystrategy@awe.gov.au

RE: National Biosecurity Strategy - Consultation Draft

Dear Mr Tongue,

WoolProducers Australia (WoolProducers) welcomes the opportunity to provide feedback on the National Biosecurity Strategy - Consultation Draft. Once finalised the National Biosecurity Strategy will allow the National Biosecurity Committee to oversee a biosecurity system that is, as the strategy aspires, connected, resilient and shared in order to deliver the needs of relevant stakeholders, particularly those of the Australian agriculture sector.

WoolProducers Australia is the peak industry body representing Australian wool growers across a vast range of issues, including animal health and welfare, biosecurity, natural resource management emergency animal disease outbreak preparedness, and industry development -including research and trade.

WoolProducers has a strong commitment to biosecurity, particularly through our role as the wool industry signatory to the Emergency Animal Disease Response Agreement. In addition to this role WoolProducers engage in cross-sector biosecurity related initiatives through our membership of organisations such as Animal Health Australia and the Centre for Invasive Species Solutions.

WoolProducers response to the consultation draft is outlined below:

Purpose

There must be clarification of the differentiation between “established exotic pests, weeds and diseases” and “endemic species”. As staged in the consultation draft the scope of pests, weeds and diseases to which the strategy applies is not clear. The degree to which a particular pest, weed or disease is exotic or endemic will vary depending on the level with which the assessment is being undertaken. A disease that is endemic at a national (or state) level may be exotic at the enterprise level.

Fundamental biosecurity principles relating to prevention, detection and response / management are common, regardless of whether a pest, weed or disease is classed as exotic or endemic, particularly at the enterprise level. In order to achieve the change in biosecurity culture, to which the strategy aspires, it will be critical that the strategy is not exclusively focused on a particular class of pest, weed or disease, rather the strategy should consider biosecurity activities related to any pest, weed or disease that may compromise Australia’s way of life (people, environment and economy).

Funding and investment and Shared responsibility

WoolProducers is supportive of ensuring that funding and investment is sufficient, co-funded, transparent, and sustainable for the long term to deliver on the varying needs and expectations of stakeholders. Both risk creators and the beneficiaries of biosecurity risk mitigation must play a role in funding the biosecurity system in its entirety, not just the direct elements with which they interact through the course of their regular business activities.

Industry groups have traditionally been consulted on, and participated in biosecurity system activities, either through expenditure of their respective funding contributions (i.e. taxes and levies), the provision of services that support the biosecurity system or through interaction with cost-recovered biosecurity activities, such as inspections, auditing and certification services.

With the increasing recognition of community and environmental groups as key biosecurity stakeholders, additional funding and investment will be required to meet the expectations of these groups and ensure that they can meet their respective shared responsibility obligations. Such funding must be sourced from revenue streams aligned to the respective stakeholders and not subsidised by disproportionate increases to stakeholders that already fund the biosecurity system i.e. industry.

Figure 1 of the draft strategy states that the primary responsibilities of Governments (state and federal) and Industry Groups are identical, with the exception of regulatory activities. Many, if not all, industry groups (including WoolProducers) are resource limited; and while supportive of the concept of shared responsibility in a biosecurity system, caution must be exercised to ensure that shifting responsibility is supported by proportionate funding and investment. Failure to provide sufficient funding and investment to support changing priorities and responsibilities of biosecurity system participants will compromise overall biosecurity outcomes.

Coordinated preparedness and response, partnerships and networks

Throughout the COVID-19 pandemic we have seen the direct impact that biosecurity decisions taken at a jurisdictional level can have on people and the economy. Transparency and consistency in decision making will be essential to provide the certainty that businesses require while optimising the effectiveness and efficiency of our national biosecurity system.

Efforts must be undertaken to align and harmonise state-based biosecurity operations, ensuring that decisions are supported by science, risk assessment and stakeholder consultation. Decisions must not be unnecessarily limited to, or extrapolated to fit the geographical boundaries of a particular jurisdiction as a result of regulatory convenience.

As the “shared responsibility” culture evolves it will be critical to ensure that the roles and responsibilities of each system participant and stakeholder are clearly articulated, universally understood and communicated to optimise the outcomes of the shared responsibility model.

With the ongoing disruption associated with climate change, the COVID-19 pandemic, and more recently, heightened geo-political tensions it is more essential than ever that our biosecurity system is resources appropriately, dynamic and resilient to ensure that Australia’s way of life is protected in a rapidly changing world.

WoolProducers thanks you for the opportunity to make this submission and would encourage you to contact WoolProducers’ General Manager, Mr Adam Dawes on 0455 442 776 or adawes@woolproducers.com.au should you wish to discuss our submission further, please contact

Yours Sincerely,



Adam Dawes
General Manager
WoolProducers Australia

