

Review of the Intergovernmental  
Agreement on Biosecurity Submission  
September 2024



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Independent Reviewer of the IGAB

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Thank you for providing the Plant Industry Forum with the opportunity to submit our members' views into the Review of the Intergovernmental Agreement on Biosecurity.

### **Introduction to the Plant Industry Forum**

The Plant Industry Forum (PIF) was established in 2006 for plant industry members of Plant Health Australia to collaborate and prioritise biosecurity actions and initiatives across plant industries. It seeks to strengthen, support and provide a collective voice for plant industries by fostering partnerships and advocating across the biosecurity spectrum for positive change.

The members of the PIF are signatories to the Emergency Plant Pest Response Deed (EPPRD). The PIF represents a combined annual value to the Australian economy in excess of \$43.2 billion and growth in the sector is tipped to contribute significantly to the goal of exceeding \$100 billion in farm gate output by 2030.

The Forum's members are the actual growers who pay the various levies which are invested by Hort Innovation and Plant Health Australia into specific biosecurity and research, development and extension activities into extensive preparedness projects, which add up to tens of millions of dollars annually. Many industries also use general revenue from (growers membership fees and in-kind contributions) to manage their industry biosecurity issues and roles and responsibilities as signatories to EPPRD. Collectively the Forum's members represent tens of thousands of levy paying producers whose levies, in the tens of millions, are invested into biosecurity preparedness and response activity each year.

Pest incursions that impact PIF members have significant impacts on individual people, owners, employees, suppliers and communities. During a response, the entire supply chain, production, input and service providers, processing, transport and marketing are all impacted. When a plant pest cannot be eradicated, the cost of recovery is borne by the individual grower and the industry. Whether that is through ongoing management of the pest, or the loss of a particular crop entirely. The cost of ongoing management of a new endemic pest is borne by the grower alone.

### **Biosecurity investment – industry**

The agricultural industry and specifically, the members of the PIF, make significant contributions to preparedness, as well as response.

These contributions are made for the broader economic and social benefits of strong biosecurity for all communities across the country. The contributions are also made in awareness of the significant risk posed by common imported consumer goods and passenger movement to the food and environmental safety of the nation. This recognises that the greatest beneficiary of biosecurity and food security is the Australian Government and the people of Australia. Food security is hugely undervalued, yet Australia's food security is under constant threat from drought, extreme weather events, climate change and the introduction of invasive species.

Members of the PIF are signatories to the Emergency Plant Pest Response Deed, many (9) have their Emergency Plant Pest Response levies set at a positive value. Many (24) pay Plant Health Australia levies and coordinate research and development activity to prepare and protect their industries.

Plant Industries Forum members and others collect and invest Biosecurity levies to fund biosecurity projects such as:

- CitrusWatch
- Australian Grape and Wine Industry Biosecurity Project
- AUSVEG Farm Biosecurity project
- Avocado industry improved capability project
- Banana management of Panama TR4
- Forestry E-learning project
- Nursery Industry Biosecurity Program
- Grains Farm Biosecurity Program
- Implementing the Biosecurity Plan Review processes for the Melon Industry
- Mango on-farm biosecurity and surveillance program
- Melon Industry Biosecurity Project
- Australian Sweet Potato industry biosecurity program
- National Bee Pest Surveillance program
- National Bee Biosecurity Program
- Forest Watch Australia Program
- National Forest biosecurity manager
- Support for a PhD candidate - native psyllids associated with citrus orchards
- Support for study tours etc. to increase biosecurity awareness and capability

- Support for the Citrus Pest and Disease Prevention Committee
- Urban Biosecurity Coordinator - Citrus

State governments have biosecurity levies for regionally or crop specific biosecurity risks such as the Grains, Seeds and Hay Industry Funding Scheme (IFS) in Western Australia.

### **Plant Industry Forum – Government relationships**

Plant biosecurity is vital to Australian plant industry's productivity and to our ability to access domestic and international markets for our products. Ensuring plant biosecurity is also a function where many of the actions, currently, can only be undertaken by government. Management of plant biosecurity systems is a complex process which often requires high-level oversight as biosecurity incidences often occur concurrently.

PIF members have worked constructively with the Australian Government over the past 10 years, investing approximately \$33 million in cost sharing emergency responses and a significant amount of in-kind support. Responses requiring this type of collaboration have addressed issues such as citrus canker, brown marmorated stink bug, chestnut blight, banana freckle, khapra beetle, giant pine scale, tomato potato psyllid and Torres Strait fruit fly.

Most recently, 16 PIF members have been impacted by the detection and response to an incursion of Varroa mite, which has ultimately transitioned to management processes. This is the single biggest biosecurity response to a pest incursion in Australian history, with an estimated cost in the vicinity of \$100 million.

The costs will be shared between the 16 PIF members directly affected by Varroa, which is expected to cost around \$20 million, with the Commonwealth, State and Territory Governments expected to contribute an estimated \$80 million. This will entail each of the 16 industry bodies consulting with their growers to set an affordable levy rate for their commodity to repay the debt to the Commonwealth in a defined period. It is conceivable that this debt will be being paid back by industry into the 2030's. In the meantime, these same industries are under threat of other biosecurity threats and face the task of managing the impacts of Varroa establishing in Australia.

In this example, additional cost (not included in the \$100 million) to industries has included, but is not limited to, time and resources devoted to acting in the response, impact on crops reliant on bee pollination. Furthermore, industry will bear the ongoing costs of varroa into the future and while no public finding has been made, it is plausible to assume that the Varroa mite, as with previous incursions, was introduced via border traffic. This includes cargo ship, tourism, or freight, which are areas of the biosecurity continuum with significant economic clout that are underutilised in terms of economic contributions to biosecurity risk management for the good of the whole country.

### **Is the Intergovernmental Agreement on Biosecurity effective and fit for the future?**

Independent reviewers early observations:

- **The independent reviewer has heard unanimous agreement that the IGAB is valuable and necessary in setting out the framework that underpins Australia's biosecurity system.**

Plant Industry Forum recognises that the Intergovernmental Agreement on Biosecurity (IGAB) is an important agreement that forms the framework of how governments will work together to achieve the best biosecurity outcomes for all Australian's.

- **While the IGAB is not legally binding, the Commonwealth and each state and territory are signatories, which demonstrates a united approach in managing Australia's biosecurity system.**

Due to the national importance of biosecurity, the IGAB represents the best option for a national, unified approach to managing biosecurity. The biggest threat to this agreement is the financial pressure that the biosecurity system is under. The independent reviewer must consider improvements to the IGAB which take a unified approach to a sustainable biosecurity model.

- **The key biosecurity principles described in the IGAB are timeless, however some of the mechanisms for implementation seem outdated.**

To the outside observer the biosecurity system is complex, PIF members are for the most part not included in the IGAB and only have representation through Plant Health Australia. The independent reviewer should consider how a review of the IGAB could 'share the responsibility' of decision making and process with industry.

- **The writing style of the IGAB could be made more contemporary, in plainer English and be less prescriptive to allow flexibility in delivering on obligations.**

PIF supports a review of the style in which the IGAB is written to include plainer English, however it has concerns that promoting flexibility may lead to poorer outcomes. PIF has long called for transparency and accountability of government in the biosecurity space and is cautious about promoting flexibility at the loss of these ideals.

- **The IGAB establishes the NBC. This review could be an opportunity to look at the ability of the NBC to provide strategic oversight of Australia's biosecurity system, intergovernmental relationships, and the operation of the IGAB.**

As reflected above, the biosecurity system is complicated. The IGAB establishes the NBC, there is then a myriad of committees that cascade from the NBC almost all of which industry is either excluded from or is represented by Plant Health Australia or in a very few cases is an observer itself. PIF propose the independent reviewer consider how a review of IGAB can increase the participation of industry in the structure established under the IGAB, thus sharing the responsibility in providing strategic oversight of the biosecurity system.

### **Guiding question 1. Is the IGAB functioning as intended?**

To the extent that PIF can observe, the IGAB is functioning effectively as the mechanism by which governments engage to deliver the national biosecurity system. Given the national importance of biosecurity, the functioning of IGAB is critical to the efforts by all involved to continue to protect the profitability and sustainability of the plant industries, as well as the environment and natural fauna and flora.

PIF asks that the independent reviewer give thought to how the plant industry can be more engaged with IGAB, how its views can be considered at NBC and the committees that report to it.

The independent reviewer, in considering the future function of the IGAB, should review the IGABs capacity to deliver the National Biosecurity Plan.

There are only three clauses which refer to funding within the IGAB. The independent reviewer should consider the IGABs role in setting the framework for delivering a sustainable funding model for biosecurity across all levels of government (local, state and federal), including broadening the scope to other departments such as tourism, mining and the environment, thus sharing the responsibility at government level.

### **Are there specific clauses that impede or promote the successful operation of the IGAB? If so, which clauses?**

#### *Clause 12. Biosecurity is a shared responsibility between all system participants*

Whilst the concept of shared responsibility is often quoted, there is a significant lack of common understanding of this concept between parties and to what extent a shared responsibility is recognised and ultimately delivered in practice. Plant industries do not feel that the responsibility is shared in the sense that there is not enough consultation and opportunity for cooperation in preparedness activity, for example. There is also not enough sharing of responsibility on other sectors such as tourism and mining. Currently the IGAB is an agreement between departments of agriculture, the independent reviewer should consider the opportunity that inclusion of other governmental agencies might have to the scope and effectiveness of the IGAB.

More must be done to increase awareness within the community of their part in the biosecurity continuum both as a beneficiary and a risk creator. There is no community ownership of biosecurity in Australia, and where there is, it is not supported in any meaningful way by government. The travelling public, whether on holiday or returning home to Australia pose an enormous risk to the plant industry and broader environment, yet the communication on this important topic is limited and its impact questionable. As mentioned above bringing other departments into the IGAB may be the leadership that is needed for this to filter down.

Within the plant industries, an industry's size and organisational capacity is directly proportional to its awareness and engagement in biosecurity preparedness and response. A review of the IGAB should

consider how the Plant industries can be funded to improve delivery of responsibilities under the deed as well as critical preparedness activity and on farm biosecurity messaging.

Also at the industry level is local government, which in many cases can be reliant on primary industry as a key source of employment and economic stability. As a minimum there is potential for ILO training and biosecurity awareness at local government level.

The independent reviewer is encouraged to look at how a review of the IGAB could do more to make a 'shared responsibility' more of a reality.

*Clauses 14 and 15.*

*14. Biosecurity investment prioritises the allocation of resources to the areas of greatest return, in terms of risk mitigation and return on investment.*

*15. Biosecurity activities are undertaken according to a cost-effective, science-based and risk-managed approach.*

There are very few mentions of funding and financial arrangements in the IGAB. On average there are 40 plant pest incursions to every one animal pest incursion per year. PPIF are concerned that financial capacity to respond is becoming a significant factor in government decision making around responses. It has been our observation that funding of animal responses and 'near incursions' take priority over plant pests.

There is significant concern within Plant industries that the onus is on industry to provide science-based evidence of host susceptibility or the level of categorisation of an uncategorised pest when the capacity resides within the department to do this.

The host status of many of the plant pests that remain exotic to Australia are unknown and the potential impact on the environment and plant-based production systems and the communities and business they support is unknown. Therefore, the ability to prioritise and undertake activities in a science based and risk managed manner requires government investment in impact assessment and economic impacts by commodity and down to the region. The independent reviewer should investigate how these two clauses can be better implemented and how government funded research could assist in improving the decision-making process.

*Clause 22. The objectives of the national biosecurity system are to provide arrangements, structures and frameworks involving governments, industry and community that:*

*a. reduce the likelihood of exotic pests and diseases which have the potential to cause significant harm to the economy, the environment, and the community (people, animals and plants) from entering, becoming established or spreading in Australia*

*b. prepare and allow for effective responses to, and management of, exotic and emerging pests*

*and diseases that enter, establish or spread in Australia*

*c. ensure that, where appropriate, nationally significant pests and diseases already in Australia are contained, suppressed or managed by relevant stakeholders*

*d. enable international and domestic market access and tourism.*

The independent reviewer should investigate what opportunities are provided for the plant industries to participate in government arrangements, structures and frameworks.

The independent reviewer should consider a sustainable funding model which builds up capacity in industry bodies to effectively assist industry to prepare and respond.

- **How does the IGAB promote collaboration between Commonwealth and state and territory governments?**

The IGAB links to a number of national strategies and plans, it would be beneficial if the independent reviewer cross referenced these and could determine that the IGAB has prioritised these accordingly and that the states and commonwealth governments are across the objectives and outcomes that the plans are supposed to deliver.

It would be beneficial if the various state and territory governments reviewed their biosecurity acts and harmonised the biosecurity acts and legislation as variations in these can have unintended outcomes in a response.

Collaboration between industry and governments is possible and, can lead to great outcomes such as greater industry and community awareness, early detection and improved responses. The independent reviewer should investigate ways that IGAB can enable more peak industry bodies to engage in preparedness work and assist those already well organised to take further steps in assisting government to fulfill its role.

- **Is the 'opt-in, opt-out' nature of the document conducive to a national approach to managing biosecurity?**

PIF has concerns that the model is not binding and mounting pressure to fund biosecurity preparedness, surveillance and responses will splinter relationships.

Without greater planning for sustainable funding allocated for biosecurity activities by all parties, the priorities of efforts will be left to monetary pressures rather than responding adequately based on scientific analysis.

In recent times we have seen a push by government to create a 'sustainable funding model' for biosecurity. However, up until now this has been solely focused on the funding of the Commonwealth department of agriculture. At the same time, those involved in the National Biosecurity Strategy and



working groups under it have been calling for an implementation plan and sustainable funding source. Not too long ago the National Plant Biosecurity Strategy was revealed, again with no funding or implementation plan.

Previous reviews have all pointed to the need for a sustainable funding model. The independent reviewer must provide direction for the sustainable funding of the entire biosecurity system, because under current levels of BAU and response funding the system will not hold up. This review of the IGAB must provide a clear path forward for governments to fund biosecurity into the future.

- **Does the document structure of the IGAB allow for easy implementation and is it easy to comprehend?**

Plant Industry Forum has no comment with regard to this question.

- **Are the governance clauses effective or ineffective? How could these be amended?**

The governance clauses are high level and do not easily lead the reader to further information that would provide greater detail. It is not easy to determine if the clauses are effective or ineffective which may be an indication that they are the latter.

- **Are the IGAB governance arrangements appropriate?**

Plant Industry Forum is not in a position to comment.

#### **4.2 Cross-jurisdictional cost sharing and funding arrangements**

- **Funding is tight across the board, with the biosecurity system under significant stress as incursions and responses are growing in number and complexity.**

Australia is exposed to an average of 40 exotic plant pest incursions annually, compared to less than one for animals. Due to the volume and frequency of plant pest incursions, pest management and trade requirements, plant industries work more closely with biosecurity agencies than any other sector. The PIF are therefore aware of the high workload that our plant biosecurity agencies are exposed to daily.

Under current resourcing levels, incursions place Australia's plant biosecurity status at further risk because 'business as usual activity' is reduced. There are not enough state or federal plant biosecurity staff to continue to do surveillance on other pests, which weakens our position. There are currently multiple plant pest responses being managed across the country and high levels of concern for animal pests in neighbouring countries. There is a very real danger of industry fatigue at the current level of funding of responses, with some questioning the current system and the level of response funding being asked of growers when investment in adequate risk mitigation is questionable and those on the risk pathways are not contributing fairly.

As stated previously, the independent reviewer should give thought to the future sustainable funding of biosecurity.

- **There are gaps in the funding framework. There are deeds and agreements for cost sharing to fund emergency responses, but other activities such as preparedness, surveillance, or**

**containment are not subject to these deeds and agreements and are managed on an ad-hoc basis.**

The Emergency Plant Pest Response Deed serves parties well. It has come under an increasing amount of pressure to the high number of incursions. Other activities such as preparedness, surveillance, or containment should be considered in a broader deed. The independent reviewer should consider recommending investment in preparedness activity that is outcome driven, targeted and measurable.

- **There is an increase in incidents involving pests that affect multiple sectors including animals, plants, the environment and sometimes humans. Existing deeds were not written with these situations in mind, and more off-deed arrangements are being used to fund responses.**

Parties to the deed are under more financial pressure than was potentially conceived at the writing of the EPPRD. That does not discount the purpose or usefulness of the deed going forward. However, the independent reviewer should consider recommending the scoping of a broader deed that would address the issues being felt by parties, this could be a fundamental step in a future sustainable funding model.

- **Response decision making needs to be completed earlier, with less focus on funding and more focus on the economic, and socio-economic impacts. The independent reviewer has heard that delayed decision making on how to respond to an incursion, significantly increases the cost of the response.**

Decision making in a response is hampered by information at hand. There has not been enough urgency in developing scientific based information could assist the forming of a response plan. The independent reviewer should consider agreements in other countries and determine if there are other models that could be adopted which would enable a quicker response.

- **There is a need for a better prioritisation framework for biosecurity activities and better allocation of funding for areas that arguably face greater incursion risk of serious diseases.**

There is a serious underutilisation of data and modelling in the system. AusPestCheck is a database of surveillance data collected by most state and territory governments and some industries. More should be done to utilise this resource and provide opportunity for collaboration when it comes to preparedness activity such as targeted surveillance. There are too many such systems being underutilised in the biosecurity system. The independent reviewer should consider recommending that IGAB prioritise the full implementation of AusPestCheck, including the upskilling and resourcing of PIBs to provide suitable data which give government confidence to utilise it.

- **Limited funding in Australia's biosecurity system significantly impedes government's ability to effectively implement the obligations under the IGAB.**

PIF agrees with this statement, as stated it is the single biggest threat to the system and Australia's overall biosecurity status.

**Guiding question 2. What changes, if any, could be made to the current cost sharing and funding arrangements for cross jurisdictional activities outlined in the IGAB?**

There are currently only three clauses in the IGAB specifically related to funding arrangements. The independent reviewer is encouraged to review this situation and that a review of the IGAB should lay out a plan for funding throughout the system.

As called for in previous reviews, the independent reviewer should consider recommending a stocktake of the overall funding situation for Australia's biosecurity system. PIPF agree with the independent reviewers' statement that there is no 'clear picture of total investment in the national system'. PIF has long called for transparency in government around funding of biosecurity activity.

The stocktake should include funding derived from other sources too such as grower levies collected by RDCs and Plant Health Australia that are used in preparedness and response activity.

PIF considers that a wider group of 'beneficiaries' of biosecurity exist outside those identified recently by the federal government (namely primary industries that are not contributing to biosecurity, the tourism sector, businesses further along the supply chain such as processors of primary produce, and retailers of fresh produce and plants).

Of greatest concern is the failure by any government to adequately address the disparity between those who create risk and those who pay for a response because they are singled out as 'the beneficiary'. A levy on imported goods that builds to a war chest for use in directly related responses is an equitable way forward which the independent reviewer must consider recommending in this review.

### **Guiding question 3. How did COVID-19 affect the functioning of the IGAB**

Noting the independent reviewers' general comments PIF agree that the pandemic highlighted the magnitude of impact on Australia and shone a spotlight on the importance of biosecurity. The social and economic impacts COVID-19 and the subsequent biosecurity controls had on this country are still being felt. Disruptions in the supply and availability of inputs were a serious concern during COVID-19 interventions which could lead to reduced crop protection and an increased risk of existing plant pests and diseases outbreaks. This in turn is a serious threat to food security. The worst-case scenario for these disruptions was not realised this time, however it was a preview to how fragile the economic stability of this country could be if producers are unable to continue their due diligence on farm. Industry function needs to be a key consideration in times of crises and under the IGAB to allow producers to continue to source their inputs and carry out their work.

Similarly, delays in movements for on-ground biosecurity officers performing vital biosecurity surveillance and potential response activities is of real concern to PIF. A streamlined process and allowances for workers in this area must be considered and shared across all jurisdictions to ensure threats are not missed due to red tape.

PIF suggests the independent reviewer make recommendations that wording is added to the IGAB which identifies the importance of allowing government approved biosecurity officers to go about their business with as little interference as possible during such events as a national pandemic.

### **Guiding question 4. Previous and ongoing reviews**

**Do you have any comments about the review of the IGAB?**

As stated frequently throughout our response, the PIFs considers the need for sustainable funding absolutely critical. This cannot only be at commonwealth level as has been seen recently, it must include all levels of government and go more broadly across departments into other 'beneficiaries' such as tourism and the environment.

Protecting Australia's plant industries, environment, and social amenity to support both preparedness, response and on-going management activities should not fall on agriculture agencies and primary industry alone. As all members of our society benefit from biosecurity, everyone should contribute to sustainable funding, this should be led by the IGAB and this review must layout a pathway forward for it to be a meaningful and impactful exercise.

Sincerely,

A handwritten signature in blue ink, appearing to be 'Nathan Hancock', with a stylized 'N' and 'H'.

Nathan Hancock

Plant Industry Forum Chair

Citrus Australia Chief Executive Officer