



CATTLE COUNCIL OF AUSTRALIA

SUBMISSION

18 March 2022

Department of Agriculture, Water and the Environment
GPO Box 858
Canberra City ACT 2601

Via email: nationalbiosecuritystrategy@awe.gov.au

Dear Sir/Madam

Re: Consultation Draft for the National Biosecurity Strategy

Cattle Council of Australia (CCA) is the peak industry organisation representing Australia's grass-fed cattle producers. Established in 1979, CCA brings together all state-based farming organisations representing cattle producers in their jurisdiction, associate member organisations with close connections to the cattle industry, and individual cattle producers.

CCA supports the development of a National Biosecurity Strategy and welcomes the opportunity to provide comment on the National Biosecurity Strategy Consultation Draft. We provide this submission without prejudice to any additional submission from our members or individual producers.

This submission supports CCA's pre-existing insistence that:

- there be an immediate strengthening and resourcing of biosecurity;
- any additional revenue be spent solely on upgraded biosecurity systems and protocols
- there be a substantial increase in biosecurity detector dogs, sufficient for risk-based screening of the rising volumes of incoming passengers, mail and freight and;
- the annual demand for an 'efficiency dividend', as it impacts on border-biosecurity staff numbers, be removed.

CCA supports the assertion that the biosecurity risks facing Australia are becoming increasingly complex and harder to manage. Several significant exotic animal diseases have emerged in our region, escalating the biosecurity threat to the cattle industry. Of note is the recent detection of Lumpy Skin Disease in Indonesia. It is imperative that Australia increase its focus, resourcing and promotion of biosecurity as a national priority.

CCA supports maintaining Australia's disease-free status to ensure the economic resilience of our industry and the Australia economy through improved biosecurity arrangements to increase access to, and the performance of, existing and new markets. We also support and promote a national whole of industry integrity system that delivers consistency in policy across the supply chain and appreciate the recent Australian Government announcement to commit \$68.4 million to improve traceability.

1. Scope of the National Strategy

CCA broadly supports the development of the six priority areas which include:

- shared biosecurity culture;
- highly skilled workforce;
- sustainable investment;
- stronger partnerships;
- coordinated preparedness and response and
- integration, supported by technology, research and data.

In relation to “shared biosecurity culture” and “Stronger partnerships”, the strategy would benefit from specific references to farmers and other landholders (such as indigenous groups and government agencies) that demonstrate how individual land managers relate to Australia’s broader biosecurity system and indeed the strategy itself. As the Consultation Draft currently stands it is difficult to see how land managers, who are essentially our frontline managers, can relate to the draft National Biosecurity Strategy.

Additionally, it will be important that the strategy acknowledges the role of all participants in the value chain of concerned commodities, given that it is the commodity value chain that will detect and manage biosecurity incursions. Continual improvement in our traceability systems will be paramount to value chain management of biosecurity events and the protection of trade. CCA supports the need to strengthen traceability arrangements to support improved biosecurity outcomes.

CCA supports a broad and inclusive approach to the National Biosecurity Strategy. CCA recommends that the National Biosecurity Strategy relates to the key participants in the system, specifically the inclusion of references to farmers, other land holders and relevant commodity value chain participants.

2. Roles within the Biosecurity System

CCA supports a broad and inclusive approach to biosecurity. This includes, where possible, the cooperation of importers in defending Australia’s agriculture and environment from biosecurity threats under the newly introduced approved arrangements.

CCA recognises that many importers, while ideally positioned to detect and prevent incursions, lack the stakeholder status of our farmers and landholders and will rely on strict oversight from the Department of Agriculture Water and the Environment (Department) to drive improved biosecurity outcomes. In the long term, the Department will need to work closely with importers to ensure they have the skills and training to effectively implement the approved arrangements.

Further, a broad and inclusive approach to biosecurity would benefit from the inclusion of stakeholders such as CCA as equal parties. Peak industry organisations can significantly assist with the national biosecurity effort. The sharing of information and data with CCA, in real time, would improve our role in biosecurity and would greatly enhance our “shared biosecurity culture”.

CCA supports amendments which include language that describes stakeholders as “equal partners”, particularly as it pertains to data and information sharing. This could significantly improve the role of CCA in biosecurity.

3. Biosecurity risks and opportunities

The Australian cattle industry sets the standard for world class animal health, welfare, biosecurity and production practices through a whole of industry health and welfare system, adoption of animal health, welfare and biosecurity best practices and optimising animal production for the environment and market.

In terms of opportunities, CCA would encourage the use of language within the Consultation Draft that describes a “real-time” approach under each of the six priority areas. Specifically, the development of the “integration supported by technology, research and data” to allow real-time management and responses to biosecurity events.

Our biosecurity efforts rely on preparedness to enable a coordinated and appropriate response to biosecurity threats or incursions, therefore each of our biosecurity partners and their workforce need to adopt a “real-time” mindset, as part of our culture if we are to successfully defend ourselves against increased threat levels. Further, the continued improvement in biosecurity systems, including whole of chain traceability, will be critical to supporting a “real-time” culture.

The Consultation Draft should include language that describes a “real-time” approach to each of the six priority areas, specifically data, investment, technology and culture. It should also seek to influence a real-time culture in prevention and response.

4. Actions

CCA agrees broadly with the proposed initial actions listed in the Consultation Draft. Of particular interest are the actions around sustainable investment. It is CCA’s view that sustainable investment is the key to all other actions and, if this is not resolved, will continue to be a stumbling block for biosecurity into the future.

CCA considers the Risk Return Resource Allocation (RRRA) model¹ be included in the strategy with a view to redirecting funding to areas that provide the greatest return on investment to producers, industry and the community.

Further, CCA supports the Commonwealth Biosecurity 2030 Roadmap in its identification of the need for “a funding and investment model that is sustainable for the long-term”. Specifically, its reference to “examine current and possible future cost recovery arrangements” and “co-funding and investment strategies with key system partners”, to build the strength of the national system.

CCA understands that the Department has undertaken internal reviews to determine what opportunities may exist to cost recover biosecurity activities to improve and sustain investment in biosecurity. CCA would support cost recovery efforts around inspecting biosecurity risk activities such as importation of cargo. To this end, CCA supports the introduction of the container levy, as recommended to government but not adopted. Further, revenue from the new container levy should be spent on upgrading biosecurity measures.

CCA also recommends working more closely with Australia’s network of Research and Development Corporations (RDC’s) to develop new biosecurity techniques and technologies. Some of these RDC’s share a remit in biosecurity and directly referencing them in the strategy would assist in describing the way forward.

CCA agrees with the listed actions under “highly skilled workforce”, “sustainable investment” and “integration”. However, we would suggest the consideration of specific education and career pathways for the biosecurity workforce as this field grows into an industry of itself.

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.

CCA agrees broadly with the proposed initial actions listed in both the Consultation Draft and the Commonwealth Biosecurity 2030 Roadmap. CCA supports the specific inclusion of improved cost recovery measures such as the container levy and the promotion of biosecurity as a career pathway.

5. Implementation and Review

CCA broadly supports the implementation of a National Biosecurity Strategy as well as the proposal to review it every five years. However, CCA would like to suggest the possibility of an interim review of the National Biosecurity Strategy on a need's basis. In the case of significant findings from other reviews and/or following a significant biosecurity event, it is important that the strategy is informed by significant biosecurity events and reviews if it is to remain contemporary and adaptable.

One of the mechanisms by which this implementation and review could be assured is with the support of the Commonwealth Biosecurity 2030 Roadmap, that includes timeframes for implementation, periods for review and the process and timing of future consultation. This would allow for a progress assessment for actions achieved by the implementation of the strategy as well as the identification of lessons learned as they apply to the strategy.

CCA recommends the provision of an interim review of the National Biosecurity Strategy, in the case of significant findings from other reviews and/or following a significant biosecurity event.

We look forward to further consultation with the Department on this important process. If there are any queries about this submission, please do not hesitate to contact our office on 1300 653 038 or email policydirector@cattlecouncil.com.au.

Yours sincerely

John McGoverne
A/g Chief Executive Officer