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To whom it may concern

Making national biosecurity funding sustainable

Background

Thank you for the opportunity to respond to the Department of Agriculture, Forestry and Fisheries on making national biosecurity funding sustainable.

NRM Regions Australia is the national representative body of Australia's 54 regional NRM organisations. Our members cover all of Australia and are major partners in the delivery of the Australian Government's Natural Heritage Trust, currently the National Landcare Program.

The following provides an overview of key considerations in establishing a sustainable funding model for nationally relevant biosecurity. The scope to which NRM Regions Australia has considered this question was informed by the Discussion Paper and through further discussions with representatives of the Department. As a result, the response is contextualised against the pre-border control, and post-border responses relating to general surveillance, active surveillance, and incursion response activities limited to containment and eradication where NRM organisations may be or are involved. Activities delivered by NRM organisations relating to asset-based protection against established/endemic pests, weeds and disease were given less consideration, although some recommendations are made where these intersect with federal government responsibilities defined within intergovernmental agreements (i.e. Ramsar Convention) that are not covered by existing biosecurity-related deeds.

The following submission is based on information gathered through a facilitated workshop, arranged through NRM Regions Australia's Biosecurity Community of Practice, involving representatives from NSW, Victoria, Tasmania, South Australia and Western Australia. Further written input was sought through an online platform.

Responses to survey questions

- 1. Considering the potential funding options and opportunities outlined in the discussion paper, as well as from your experience, what elements do you think a sustainable biosecurity funding model should include? Are there elements that should not be included; if so, why?***

The key principles required for a sustainable funding model include recurring funding that cannot be reallocated or reduced unless there is a scientific rationale based on reduced overall need. The funding should be transparently justified against appropriately resourced national frameworks and be apportioned across the relevant parts of the invasion curve. This should be based on established and understood processes for assessing risk, and the capacity for funds to effectively mitigate these risks.

A sustainable model should ensure that appropriate funding is allocated to post-border general surveillance to enable early interventions to increase the likelihood of eradicating threats when their distribution and impact is low. This can be provided at a national scale through the NRM regions using appropriately qualified and capable staff. The model should also include funding for regional biosecurity coordinators to deliver community engagement to enable knowledge-based reporting of new threats, complemented by localised data quality-control to reduce the level of misreporting. This should be complemented by greater resourcing for a standing capacity to deliver early response actions.

Financially it is important that all risk creators and beneficiaries contribute directly to the biosecurity systems. Significant effort is required to better understand and communicate the risks and benefits associated with different pathways and the potential impacted environments. This need is far greater for environmental threats and assets, and for human-related vectors such as tourism. There is a strong rationale for a greater passenger movement charge, however the revenue gathered from this needs to be appropriated distributed based in part on the biodiversity values and susceptibility of potentially impacted environments.

A sustainable funding model should avoid the perverse outcomes associated with some competitive grant programs used for actions to protect assets from established threats. These include insufficient funding to address landscape scale impacts; inadequate risk assessment processes leading to non-strategic investment decisions; and inconsistent and irregular funding to achieve desired outcomes.

2. *How would your proposed model operate at a practical level and who would it apply to?*

Two alternative models were explored: new and expanded levies; and a recurring allocation of federal grant funding to maintain and expand the community engagement and awareness roles delivered by NRMs.

NRM Regions Australia suggests that a broadening and increase in levies could help address the gap between the growing risk, and Australia's capacity to manage it. This could involve the introduction of a biosecurity related freight levy, as previously mooted. There have also been discussions of the need for a general biosecurity levy, and an increase in the passenger movement charges on international travellers could be considered with a similar rate to that applied in New Zealand, to ensure that beneficiaries are paying for the management of potential impact.

The freight levy could be tiered based on the risks assessed for individual movements and the actions taken by industry to mitigate risks. The compliance with best-practice methods to reduce risks should be assessed and reported by independent verification scheme.

Funding to support biosecurity coordination, awareness raising, and engagement should be considered as an additional dedicated part of federally funded programs. The current arrangement with the regional NRM organisations enables the additional efficient delivery of Australian Government objectives in an agile and effective manner. Similar to the successful Regional Agriculture Landcare Facilitator component of the Regional Land Partnerships Program, an additional allocation could be used to establish a national network of Regional Biosecurity Coordinators to undertake these tasks. If nested with the NRM network, this approach would address the current issues with siloed approaches between agricultural and environmental biosecurity risks given the integrated approach used within the NRM sector. This approach can create efficiencies through providing a focal point for other key stakeholders within the biosecurity network.

3. *How would your proposed model impact you and others? What would be the benefits or disadvantages to you and/or other stakeholders?*

The recommended changes would enable an appropriate standing capacity for post-border general surveillance and early detection increasing the potential for containment and eradication. This has significant benefits in reducing the likelihood of new threats becoming established as endemic pests, weeds or diseases, which has a lower ROI and greater need of overall funding in terms biosecurity activities. In simple terms, greater investment in the middle of the invasion curve will result in significant savings in the right hand side of the curve.

It is recognised that additional charges and levies impose a charge (direct or trickle-down) on residents/consumers. It is important that an appropriate and rationalised communication program is used to demonstrate the value proposition. A tiered cost-structure could incentivise increase hygiene practices leading to transformational changes in behaviours.

4. *Is the proportionality between those who contribute to the funding system and those who benefit the most, right?*

The current system insufficiently recognises the bulk freight sector and tourists (as risk creators) and the general public and tourism operators (as beneficiaries).

5. *Are there other technologies, current or emerging, that could be employed to increase the efficiency of the biosecurity system, and perhaps reduce operational cost?*

The establishment of a general surveillance capacity through the NRM network should be complemented by the greater use of technology for artificial-intelligence based identification and online reporting. This would also enable a greater use of citizen science with increased confidence of avoiding mis-identified threats.

A national repository of guiding information, such as best practice manuals, as proposed by NRM Regions Australia as part of a Biosecurity Hub, would enhance the capacity and timeliness of the biosecurity sector to undertake key actions to mitigate threats.

There is also a need for a single source of data on the current distribution of endemic pests, weeds and disease, complemented by data on the extent and vulnerability of areas. At a minimum this should address the areas relative to the National Priority List of Exotic Environmental Pests, Weeds and Diseases and other exotic threats related to the agricultural sector.

An increase in funding for detection dogs (including those able to detect invasive weeds) is supported.

6. *How could the Commonwealth Government improve efficiency in the biosecurity system (consistent with meeting our Appropriate Level of Protection)?*

The key outcome is to reduce the complexity of the biosecurity system that causes overlaps and gaps in activities. Related to this, better formal definition of roles and responsibilities including those of community groups would greatly increase efficiency.

Support to better connect RDE providers and practitioners delivering on-ground control would drive efficiencies.

Resourcing to enable better targeted general surveillance by knowledgeable practitioners would reduce the likelihood of misreporting of new threats. This could be complemented by using hazard dispersal mapping and agent-based modelling to better understand the risks and vulnerabilities of receiving environments rather than reactively responding to new incursions.

Proactive investment in communication and education of risk creators will drive efficiencies.

There may be a role for government in driving in the accreditation of importers and exporters (wanting ESG verification) in regard to biosecurity practices.

7. *What other investments or actions could the Commonwealth Government make or take to sustainably support the delivery of biosecurity activities?*

The following areas were identified as opportunities:

- Opportunistic impact investment such as post-fire weed control where it relates with matters of national significance.
- Greater investment to support First Nations involvement and capacity building.
- Better capture, collation, consistency and coordination of data to support investment.
- Development of functional set of National Environmental Economic Accounts to determine the value of non-agricultural assets
- Ensure continuity of investment to avoid waste.
- Greater focus on containment within Australia to avoid pristine assets from being impacted.
- Expand work on web-scraping to capture incursions, as well as policing online sales

Regional NRM organisations are willing partners to assist the Australian Government to achieve effective biosecurity control. NRM regional organisations work with all land managers and they cover the entire continent. Regional NRM organisations have extensive community and land manager networks, and can use these relationships to drive achievement of multiple environmental, agricultural, social and economic outcomes. Regional NRM organisations are an important part of the biosecurity framework within Australia and can expand on current roles to further strengthen our responses to new incursions. We look forward to working with the Australian Government to bring our significant knowledge and skills to develop a complete solution to new pest, weed and disease threats.

Yours faithfully

A handwritten signature in black ink, appearing to read "A Meddle".

Andrew Meddle
Chair, General Managers Forum