

Have Your Say – Sustainable funding and investment to strengthen biosecurity.

Plant Health Australia (PHA) welcomes the opportunity to provide a submission to the Department of Agriculture, Fisheries and Forestry in response to the discussion paper on sustainable funding and investment to strengthen biosecurity.

About PHA

We are the national coordinator of the government-industry partnership for plant biosecurity, and this initiative aligns with our mission to strengthen the Australian plant biosecurity system for the benefit of the economy, environment and community.

Established in the year 2000 as a not-for-profit company limited by guarantee, PHA facilitates and drives partnerships to improve policy, practice and performance across Australia's plant biosecurity system. Our funding model is through annual member subscriptions as well as actively seeking additional funding to undertake projects for individual members, groups of members and non-members. Members of PHA include the Australian Government, all state and territory governments, and 39 peak plant industry bodies (PIBs) and 10 associates. For a recent description of PHA's program visit our recently published [2021-22 Annual Report](#).

Sustainable funding and investment reform

1. Considering the potential funding options and opportunities above, 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?

There are many ways to improve the sustainability of biosecurity funding and investment. PHA believes that taking a collaborative, co-investment-based approach that builds stability together with more formal commitments with each of the states and territories, industries, Research and Development Corporations and domestic and international supply chains, will deliver significant additional value.

PHA believes the term 'sustainable funding' can be defined as the resources required to sustain the delivery of a biosecurity system that includes coordination and management of responses to incursions, digital systems for pest identification, data capture and analysis, national communication and engagement, governance and coordination, surveillance, diagnostics and training to maintain and build capacity and capability for all parts of the system.

The model needs to include funding to support Australia's collective ability to communicate, prepare for, identify, detect, respond and recover from plant pest incursions and to support Australia's ability to identify and detect biosecurity threats. The funding and investment model needs to also include data and information sharing arrangements, together with mechanisms to prioritise activities ensuring our collective capacity and capability our diverse plant, animal and natural environments and high-risk urban pathways.

Biosecurity cannot be delivered by any single entity or agency. It requires not only a sustainable funding model but also a culture of collaboration, co-investment and co-design with all levels of government, industry and producers and community to building their capability and capacity to participate and meet obligations under a partnership approach.

PHA recommends that any funding and investment model developed is evidence-based, equitable, transparent and accountable. It is also important that any funds generated through the provision of biosecurity services are appropriated in a way such that they provide continued benefits for the biosecurity system.

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

PHA urges the Biosecurity Sustainable Funding Taskforce not to proceed with a one-size-fits all or one-size fits most approach, but rather a collaborative approach of empowering partners and fostering co-investment.

The Australian economy, environment and communities are put at risk by freight and other arrivals yet the cost for eradication of emergency plant pests is shared by industry and governments alone. All Australians are the beneficiaries of a strong and robust biosecurity system and hence should contribute; the simplest mechanism to address this would be through an increase of government appropriations. This action in conjunction with seeking new funding sources such as those that embed a market signal for the manageable biosecurity risk of freight, trade and other arrivals (vessels, mail, passengers), is recommended.

Such a model would provide a base to deliver critical elements such as digital systems for data capture and analysis, communication, surveillance and diagnostics. Funding and investment of biosecurity research and development could also be included using existing mechanisms such as the Plant Biosecurity Research Initiative.

Many plant industries are seeing the importance and value of establishing levies on their industries for biosecurity through the *Plant Health Australia (Plant Industries) Funding Act 2002*. Whilst empowering and valuable, levy establishment is a resource impost on busy industries due to the time needed to develop business cases and undertake consultation and then pay the levy. Governments are equally constrained in identifying and harnessing new funding sources.

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

A more sustainable funding base is important to ensure our biosecurity system is strong and has adequate resourcing to meet operational needs, deliver essential business transformation and drive co-investment. It will also help to drive national system innovation and reduce stress on the system in the event of an incursion.

Currently, there are few sources of funding for the plant biosecurity system. Low levels of resourcing are limiting plant biosecurity agencies in their ability to adapt to meet growing threats and opportunities, costing plant industry productivity tens of millions of dollars annually and increasing the overall risk of our plant biosecurity system failing.

It is estimated that 20-40 per cent of crops are lost to plant pests and diseases each year. Reduced plant industry productivity will be a significant impediment to the sector's contribution in achieving the goal of \$100 billion agriculture production value by 2030.

With an average of 40 plant pest incursions each year, constant and concurrent responses are placing pressure on jurisdictions, PIBs, growers and PHA; eroding ability to manage these responses as well as undertake key preparedness activities such as biosecurity planning, training, communication, analysis, surveillance and diagnostics.

Fostering an improved culture of engagement, coordination, collaboration and cooperation between government, industry and the supply chain as well as across the biosecurity continuum is also considered important.

One of the cultural issues requiring attention is the status of plant biosecurity relative to biosecurity across the animal sector. PHA believes that this position is disproportionate to the contribution made to the national economy; the number of industries, plant species, entry pathways and pest threats concerned; the relative state of maturity of surveillance, diagnostic and expertise bases; and is restricting the benefits that would arise from a more proportional investment in securing Australia's plant industries.

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

No, there is an urgent need to better identify beneficiaries of an improved biosecurity system.

In developing a suitable funding and investment model that includes co-investment in pre-incursion activities such as prevention, preparedness, surveillance and diagnostics; potential co-investors, whether they be considered users, beneficiaries or risk creators, need to be engaged in the co-design of the model.

Wholesalers, retailers, transport companies, and the Australian public benefit from consistent supply of high-quality produce to domestic and international markets. Everyone benefits from food security that these supply chains maintain. Pest and disease incursions disrupt supply chains and plant industries and governments bear these costs. Without contributing to the incursion costs there are no incentives for the broader supply chain to support improved biosecurity initiatives for themselves or the growers that supply produce to their enterprises. PHA considers there is a need to expand partnerships beyond governments and plant industries to form new partnerships across supply and transport chains to ensure equitable funding.

Investments to support our operations

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 discussion paper identifies several new and emerging technologies being applied by the Australian Government to transform biosecurity arrangements and ensure they remain fit for purpose. PHA notes this work aligns with the Commonwealth Biosecurity 2030 strategic roadmap and is supportive of the focus on: technologies to support lifting our national preparedness, response capability and resilience to incursions enhancing data analytics and integrated digital information capabilities, including enabling the use of the natural business accounts of imports and supply chain participants.

In addition, it is recommended that investment in innovations that prepare us (such as High Throughput Sequencing technologies (HTS)) be made to increase Australia's diagnostic capacity and deliver rapid, more accurate results that support agribusiness and lower biosecurity risks.

Other areas requiring investigation include identifying and evaluating emerging technologies for more objectivity in inspection and movement control requirements in high-risk settings.

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

Advancements in detection technologies and business practice innovations will help improve the efficiency of biosecurity operations across the system. PHA recognises that the Australian Government is already undertaking a range of measures aimed at examining and adopting new technological innovations for biosecurity. This includes improving diagnostics and surveillance technology as well as data and analytics to manage biosecurity risks in passenger pathways at international airports and seaports.

Strengthening and expanding partnerships through greater investment in systems that support Australia's ability to respond such as those that facilitate sharing of accurate and current biosecurity information, data and intelligence (from industry, government and community). One option is to allow plant industries to engage at the state and national level in the areas of priority setting, decision making and planning such as the National Biosecurity Committee and the Agriculture Senior Officials Committee. Investment is also needed for a national communications and engagement campaign to raise public awareness of biosecurity and its role in food security and a growing economy.

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

PHA believes the development of a transparent reporting and investment interface to showcase the efforts and achievements and demonstrate the impact and benefit to partners, co investors, industry and the community,

will deliver significant value through the generation of new ideas and approach to biosecurity tasks.

Sectoral delimitation of Australia's biosecurity system (e.g. animal vs plant vs environment vs aquatic) only demonstrates the value that biosecurity delivers to a respective sector and opportunities to look at cross sectoral impacts and spill over benefits of cross sectoral preparedness are overlooked. We should be focused on risks rather than specific pest and disease threats if we are to continue to deliver the necessary actions to prevent entry of pests and diseases.

Plant, animal and environment emergency response deeds (i.e. the Emergency Plant Pest Response Deed (EPPRD), the Emergency Animal Diseases Response Agreement and the National Environmental Biosecurity Response Agreement) are key components of our national biosecurity system. As custodians of the EPPRD, PHA recommends the Australian Government continues to demonstrate confidence and greater investment in the deeds as tools to articulate responsibility for cost-shared national response arrangements.

The plant biosecurity system has matured significantly since the EPPRD has been in place, however many plant industries still struggle to build and maintain the capacity and capability to ensure they can participate in shared decision making. Persistent plant pest incursions perpetuate pressure on PIBs. Incursions require PIBs and PHA to rapidly invest in significant crisis and change management skills, communication and media training, and just-in-time training to assist Affected Parties to make informed decisions throughout the response. Dedicated support to assist industries manage these considerations as well as liaison with industry and community groups, is an operational need that would improve consistency in national responses and alleviate considerable pressure within the biosecurity system.

Policy development and implementation is central to setting strategic direction, addressing existing and emerging issues and ensuring accountability. It is about making sure industry is focused on, committed to and effective in addressing the issues and opportunities that matter the most to improve biosecurity and industry prosperity.

When policy developers are too removed from the farming sector, they can risk making decisions in isolation of and in some cases in conflict with the reality of running a farm business. Policy developers need clear, consistent and collective input in the pursuit of constructive policy. The ability of farm advocacy groups in Australia to provide clear and concise input is at risk in many parts of the country, with their shrinking resource base and declining membership (*Opportunities to Improve the Effectiveness of Australian Farmers' Advocacy Groups*, AFI, March 2014).

It is understandable that governments are sensitive to the governance risk that public funds (i.e. including statutory levies) could be used for political activities. Similarly, farmers who pay statutory levies hold a diversity of political views and are also sensitive about the use of their levies for political activities.

PHA supports the view that the function of strategic policy development should be a legitimate use of levy funds within and across agricultural industries. PHA believes that it should be undertaken in the right environment that is safe, strategic and constructive for policy development together with an industry and organisation commitment to cultivating policy development capacity for the future.

Conclusion

This submission has not focused on any specific plant industry and has instead focused on the overarching issue of funding of and investment in Commonwealth biosecurity activities undertaken outside Australia, at the border and within Australia.

PHA recognises that the Biosecurity Sustainable Funding Taskforce will receive numerous submissions and be provided with wide ranging feedback from many different organisations and individuals.

Whilst these will all be incredibly important, the biggest challenge that the Taskforce will face is trying to modernise a funding and investment model that has to date never been developed as a system. PHA believes that a collaborative and co-investment approach to this model that includes the involvement of plant industry leaders to deal with the tensions, complexities and nuances that each sector and supply chain presents, will deliver the best outcome for growers and Australia's biosecurity system.

PHA would be pleased to hold further discussions with the Taskforce, or to assemble a panel of our government and industry members to collectively discuss the issues raised in this submission to achieve better biosecurity outcomes for Australia.

I look forward to seeing the outcomes from this critical piece of work.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S. Corcoran', with a stylized flourish at the end.

SARAH CORCORAN

Chief Executive Officer