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18 March 2022

National Biosecurity Committee
Department of Agriculture, Water and the Environment
Canberra

Submitted via website: https://haveyoursay.awe.gov.au/national-biosecurity-strategy

Dear National Biosecurity Committee,

Re: consultation draft of the National Biosecurity Strategy

Thank you for the opportunity to provide comment on the draft National Biosecurity Strategy.

AMA is the peak industry association representing the registrants and approval holders of veterinary medicines and animal health products in Australia. They are the local divisions of global innovators, manufacturers, formulators and registrants that supply essential veterinary medicines and animal health products that are critical to supporting Australia's $28 billion dollar livestock industry and the $13 billion pet industry. Our members represent more than 90% of registered veterinary medicine sales in Australia.

AMA member companies play a vital role in Australia's biosecurity as the producers of medicines that prevent, control and treat animal diseases across the livestock, equine and companion animal sectors. AMA members develop, register and supply innovative new medicines including vaccines and anti-infection medicines to prevent and control outbreaks of animal disease, as well as medicines and treatments that enable good health and wellbeing. Healthy animals are much less susceptible to disease and infection, and good animal health is essential to good animal welfare.

Australia is in a unique position because many of the world's most devastating and debilitating animal diseases are not present here. Our strict biosecurity measures and systems help maintain this disease-free status, protecting animal health and welfare, public health, environmental health, food quality and safety, and give Australia a strong competitive advantage in global markets. An outbreak of animal disease could have severe ramifications for the entire agricultural sector, as well as domestic animal health, food safety, public health and our environment.

We are pleased to provide the following comments for consideration by the National Biosecurity Committee. If we can provide further information at any time, please do not hesitate to contact me.

Yours Sincerely,

Dr Charmian Bennett

Director, Science and Policy

(unsigned for electronic submission)

SUBMISSION ON THE

consultation draft of the National Biosecurity Strategy

18 March 2022

Animal Medicines Australia

Introduction

Animal Medicines Australia (AMA) is the peak body representing the leading animal health companies in Australia. AMA member companies are the innovators, manufacturers, formulators and registrants of a broad range of veterinary medicine products that prevent, control and cure disease across the companion animal, livestock and equine sectors.

AMA supports the prioritisation of biosecurity on the national agenda with the development and implementation of the new National Biosecurity Strategy to protect Australia from the harmful impacts of exotic and established exotic pests, weeds and diseases. Climate change, shifting and unpredictable trade and travel patterns, and changes in land use pose multiple and complex risks to Australia's animals, people, environment, economy, livelihoods and way of life.

The agricultural sector is a multi-billion-dollar industry that is critical to Australia's economy. Australia's disease-free status for many debilitating animal diseases is rare and confers significant benefits to the reputation of Australia's agricultural industries. It delivers important market advantage for our producers through competitive costs of production, the production of high quality goods and industry sustainability.

Animal disease incursions pose serious risks to animal health and welfare, productivity and sustainability. The World Organisation for Animal Health (OIE) estimates that more than 20% of animal production worldwide is lost as a direct result of disease[1]. Without access to animal health products such as vaccines, antimicrobials and parasiticides, farm productivity would be reduced due to:

- higher farm input costs per unit of production, which are often passed on to consumers,
- sick animals being less productive, thus reducing returns on farm investment,
- higher animal mortality due to illness or disease, leading to falling stock numbers and the loss of valuable genetic lines, and
- more labour-intensive stock management practices to control and manage disease on farm.

Healthy animals are much less susceptible to disease and infection, and good animal health is essential to good animal welfare. Maintaining the health and welfare of Australia's livestock is essential to realise the National Farmers Federation's ambitious goal of Australian agriculture being a $100 billion sector[2] by 2030.

Animal disease outbreaks have catastrophic and far-reaching impacts on animal welfare, agricultural industries and our everyday lives. Strong biosecurity is invaluable to mitigate the significant costs of responding to and controlling a preventable disease outbreak.

For example:

- An outbreak of Foot and Mouth Disease (FMD) in Australia would be devastating for the meat and wool industries, halting exports for at least six to 12 months and costing the industry up to $50 billion over ten years.[3] Such an outbreak would have significant impacts on both food availability and cost.
- A 1999 outbreak of Newcastle Disease in Australia resulted in the slaughter of 1.9 million meat chickens and 13,000 laying hens, with a cost to farmers of around $200 million. The eradication program took 3 months, involved 5000 people and cost the government $22

[1] VS-FINAL-EN.pdf (oie.int)
[2] 2030 Roadmap - National Farmers' Federation (nff.org.au)
[3] Megatrends, opportunities and challenges facing Australian livestock industries

million excluding compensation.[4] There have been no outbreaks of Newcastle Disease in Australia since a vaccination and surveillance program was implemented in 2002.[5]

- The 2007-08 outbreak of equine influenza (EI) caused unprecedented economic loss and disruption to Australia's equine industries in New South Wales and Queensland, with the direct costs of the emergency response conservatively estimated to be in excess of $360million.[6] This estimate did not include the indirect economic, social and emotional costs to horse owners associated with the death or illness of their horses, disruption to business and recreational activities, strict movement restrictions and other biosecurity measures, and participation in disease tracing and surveillance activities. Restrictions on the movement of horses persisted for more than 6 months, causing significant economic and social disruption for professional and recreational equestrian sports, horse racing and veterinary professions in both infected and uninfected regions, with increased state border controls across the country to prevent the spread of disease and the secondment of key staff to the infected areas.

Australia's strong biosecurity at international, national, regional and local levels, and industry-led disease preparedness and response processes, including access to disease prevention tools such as vaccines, are central to maintaining animal health and keeping devastating animal diseases out of Australia.

AMA considers it essential that:

- **The biosecurity framework and elements prioritise risk-based assessment and are underpinned by science,**
- **Response and control measures are proportionate to the risk posed by an activity or disease,**
- **State and territory-level biosecurity activities and strategies are aligned with national activities and strategies, whilst allowing unique or location-specific risks to be appropriately addressed, and**
- **The biosecurity system considers both current and future biosecurity threats, with the agility to respond to sudden shocks (such as disease incursions or COVID-19-related disruptions to supply chains for important animal vaccines).**

Most importantly, biosecurity must embed effective and efficient communication at the heart of all activities. Efficient and effective communication, collaboration and cooperation between local, regional, state/territory, national and international stakeholders is of paramount importance to ensure biosecurity and regulatory responses are timely, feasible, practical and able to deliver the desired outcomes.

1. Scope of the Strategy

The draft National Biosecurity Strategy is a very high-level plan that sets out the direction for Australia's biosecurity in the future. It is intended to build a collective vision and purpose that will enhance capability, support collaboration and build awareness of Australia's biosecurity system. AMA supports the purpose and goals of the Strategy.

[4] Chicken kill leaves bitter aftertaste (smh.com.au)
[5] Newcastle Disease Management - Animal Health Australia
[6] R Hoare (2011). 'Overview of the industry and social impacts of the 2007 Australian equine influenza outbreak', Australian Veterinary Journal, v89 (suppl.1), p147-151.

AMA also supports the 6 priority areas identified in the Strategy to guide biosecurity actions and focus efforts in high-impact areas. AMA notes that development of action plans for these 6 priority areas will be supported by further consultation with stakeholders. We look forward to participating in those consultations in due course.

2. Roles within the Biosecurity System

AMA member companies play a vital role in Australia's biosecurity as the producers of medicines that prevent, control and treat animal diseases, across the livestock, equine and companion animal sectors. AMA members develop, register and supply innovative new medicines, including vaccines and anti-infection medicines to prevent and control outbreaks of animal diseases, as well as medicines and treatments that enable good health and wellbeing.

AMA members provide medicines to address endemic disease threats (for example, Johne's Disease, Newcastle Disease and Hendra virus), and we lead the response to emerging and exotic disease threats (such as the 2007/8 outbreak of equine influenza). AMA members also produce many disinfectants and anti-infective products used for everyday hygiene and sanitation in animal environments, such as quarantine facilities, veterinary clinics and hospitals, boarding facilities, racing stables, grooming salons and in the home.

The draft Strategy identifies key stakeholders and their responsibilities to show how biosecurity depends on the integration of activities across national, regional, local and individual scales, and encompasses multiple potential entry pathways of pathogens into and within Australia. At present, state and territory governments bear a lot of responsibilities for implementing national biosecurity measures. They need to be adequately and sustainably funded to do so – weak links put the entire system at risk.

It is also important to seek harmonisation and alignment of state/territory biosecurity arrangements wherever possible and appropriate, to improve understanding and consistent application. However AMA also acknowledges the need for a degree of flexibility and variation in the system to address specific local and regional-scale biosecurity issues. Effective and efficient communication, collaboration and cooperation between stakeholders at all levels is critical to ensure risks are clearly identified and communicated to affected parties, thereby supporting efficient and effective responses that deliver the desired outcomes.

AMA considers that there are three areas which have not been adequately captured in the draft Strategy:

1. AMA considers that the draft Strategy does not capture individual-level actions, such as on-farm biosecurity or disease reporting mechanisms. Individual actions are an essential component of 'on the ground' activities that support everyday management of biosecurity risks. Engagement and understanding by individuals also facilitates surveillance, compliance, and other practical biosecurity measures that may be required.

   Farmers and local veterinarians are often the first to notice unusual disease activity, so it is critical that they are engaged in and well informed about biosecurity risks, and their role and responsibilities if a disease occurs, such as notifying authorities, isolating affected animals, and enacting strict biosecurity protocols for entering/leaving properties. The importance of

obeying farm signage related to biosecurity is likely underappreciated by the general population.

2. Opportunistic detections are not mentioned in the Strategy. For example, khapra beetles were initially detected by a consumer who had purchased household goods imported into Australia. This particular consumer was (fortunately) cognisant of risks from exotic pest species, captured the beetle and contacted the appropriate authorities. The general public are more likely to simply reach for the household insecticide to deal with a strange insect, thus the incursion of a potentially devastating pest species could go unnoticed. Public education in this area could be valuable.

3. Biosecurity is also supported by active engagement with key industry associations and organisations (such as Animal Health Australia and National Farmers Federation), as these organisations are conduits for the dissemination of trusted advice. Local authorities and communities are also valuable sources of local knowledge and understanding on potential risks for that area.

3. Biosecurity Risks and Opportunities

Australia has an international reputation as a trusted producer of high quality, and safe, food and fibre, and that reputation provides a strong competitive advantage in global markets. Biosecurity is an essential component of our valuable agricultural and trade industries.

Biosecurity practices complement good animal husbandry and welfare to protect animal health, support a safe and sustainable food supply, and protect public health. Healthy animals support a reliable, productive and sustainable agricultural industry, and provide important trade advantages for Australian producers. An outbreak of animal disease could have severe ramifications for the entire agricultural sector, as well as domestic animal health, food safety, public health and our environment.

Biosecurity must include effective surveillance of animal disease within Australian borders. This will enable responsible authorities and affected stakeholders to detect and track endemic, exotic and emerging diseases that threaten animal health. Surveillance is critically important for diseases that can be transmitted to humans (such as brucellosis or Hendra virus), and for diseases that can persist in the environment to pose a disease threat in the future (such as anthrax).

Wild animals can be important disease reservoirs and vectors and it is important to include surveillance of wild animal populations as well as domestic animals. For example, migratory water birds can carry various strains of avian influenza, fruit bats are known vectors for Hendra virus, and wild pigs could become a reservoir for African swine fever if it enters Australia.

In the event of exotic disease detection, it is critical that veterinary medicines can be brought into Australia quickly and efficiently. For example, if FMD was detected here, a vaccine would need to be sourced from Europe as quickly as possible. It is important that our biosecurity framework has the capability and flexibility to respond quickly to emerging threats and emergency situations. This includes streamlining the process for emergency approvals and permits, fast-track systems to clear imported medicines quickly through Australian borders and risk-based flexibility in satisfying non-critical regulatory requirements.

Climate change will pose diverse and growing threats to biosecurity. Most notably, changing environmental conditions will alter the distribution and behaviour of many animal and insect species, in turn leading to changing distributions of vector-borne diseases. Flies, ticks, mosquitoes and rodents are common animal disease vectors that can quickly spread into new areas in favourable environmental conditions where they have not been previously detected or routinely looked for, and where the animal (and human) population may be immunologically naïve. Environmental stressors can result in altered disease transmission routes (if the preferential target species for a mosquito is not found in the new environment, it may feed on a new species) as well as increased infectivity and pathogen virulence. Biosecurity risks posed by changing disease distributions may be subtle and not immediately apparent, hence there is a need to ensure systems are capable of detecting both direct and indirect risks to biosecurity.

4. Actions

Australia's biosecurity is heavily dependent on the interconnectedness of many different systems in multiple locations, both within and outside our national borders. A system is only as strong as its weakest link – a failure in one part of the biosecurity system could potentially place the entire system at risk and have far-reaching impacts. It is therefore essential that actions to support and improve effective and efficient communication, partnership, knowledge sharing and stakeholder engagement across all levels of the biosecurity framework are prioritised.

A shared biosecurity culture implies a level of trust, stewardship and responsibility. Care must be taken to ensure that this does not devolve to burdensome regulations that do not address the problem. Adherence to government guidelines on best practice regulation and close engagement with stakeholders in the animal health industry will help to ensure that regulatory actions and responses are appropriate, realistic, feasible and effective.

Regulatory settings are an important component of biosecurity. The ability of animal health companies to maintain business continuity and the capacity to develop and provide critically important veterinary medicines depends on a regulatory environment that is reliable, efficient and predictable.

Disruptions related to the COVID-19 pandemic illustrate the need for flexibility and adaptability in the biosecurity system to mitigate the impacts of external stressors when 'business as usual' is not possible. In the case of an exotic animal disease incursion, Australia's ability to respond quickly and effectively (by approving and distributing a new vaccine or specific treatment, for example) will be critical. Flexibility in the biosecurity system in such circumstances, for example, could facilitate streamlined import procedures for animal medicines (or ingredients) manufactured overseas.

Flexibility and adaptability is also needed to ensure the biosecurity workforce is appropriately trained, resourced, connected and integrated to identify, detect and respond effectively and efficiently to both direct and indirect biosecurity threats, now and in the future.

5. Implementation and Review

Successful implementation will be dependent on significant consultation and engagement with stakeholders, particularly those who will be directed affected by biosecurity regulations and

requirements. Regular and informative engagement with stakeholders, alongside genuine consultation on regulatory settings, is essential to ensure that implementation actions are feasible, practical, appropriate and able to deliver the intended outcome.

AMA believes 5-yearly reviews of the Strategy are appropriate. Biosecurity threats are complex, constant and evolving, and there will be need to ensure the National Strategy remains relevant. However, a Strategy is a high-level document intended to provide overall direction for the biosecurity system as a whole, and these high-level ambitions are unlikely to change substantially over short periods (i.e. less than 5 years). The review and update of Strategy documents will also require considerable diversion of resources away from everyday biosecurity activities.

More detailed and specific guidance on biosecurity actions, which would be expected to change on a more frequent basis in response to current and expected biosecurity threats, should be reserved for the 6 Action Plans that are yet to be developed.