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1 September 2022

Mr John Tracey

Deputy Director General
Biosecurity and Food Safety
Strategic Programs and Partnerships
NSW Department of Primary Industries
Locked Bag 21
ORANGE NSW 2800

Submitted via email: bfs.strategy@dpi.nsw.gov.au

Dear Mr Tracey,

Re: Consultation Draft: NSW Biosecurity and Food Safety Strategy 2022-2030

Thank you for the opportunity to provide comment on the draft NSW Biosecurity and Food Safety Strategy.

Animal Medicines Australia (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 \$34 billion livestock industry and the \$30 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 and food safety 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, and the production of food and fibre products that are safe for human consumption and use. 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 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 NSW DPI. 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: NSW Biosecurity and Food Safety
Strategy 2022-2030

1 September 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 NSW government's agenda with the development of the draft NSW Biosecurity and Food Safety Strategy (the Strategy) to protect against the harmful impacts of exotic and established exotic pests, weeds and diseases.

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 benefits to agricultural industries. It delivers important market advantage for producers through competitive production, high-quality goods and industry sustainability.

Animal health can directly affect human health through the transmission of zoonoses – diseases that can be spread between animals and people. Common zoonoses include foodborne illnesses such as salmonellosis, listeriosis and botulism. These can be transmitted through the consumption of contaminated food products that originate from animals (eg: dairy products, eggs or meat/fish). Parasites including ticks, fleas and worms can also pose zoonotic risks if animals are not regularly treated with effective parasite control products. Healthy animals, and food products derived from healthy animals, are less likely to carry pathogenic organisms that pose risks to human health. One of the most effective ways to reduce the incidence of zoonotic disease is to keep our animals healthy.

Healthy animals are much less susceptible to disease and infection, and good animal health is core 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 sector¹ by 2030.

Animal disease incursions pose serious risks to animal health and welfare, productivity and sustainability. The World Organisation for Animal Health (WOAH) estimates that more than 20% of animal production worldwide is lost as a direct result of disease². 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.

Australia's 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 animal diseases out of Australia.

¹ [2030 Roadmap - National Farmers' Federation \(nff.org.au\)](https://www.nff.org.au/2030-Roadmap)

² [VS-FINAL-EN.pdf \(woah.org\)](https://www.woah.org/vs-final-en.pdf)

AMA considers it essential that:

- **The Strategy prioritises risk-based assessment and its activities are underpinned by science,**
- **Response and control measures are proportionate to the risk posed by an activity or disease,**
- **State-level biosecurity and food safety activities and strategies are aligned with national activities and strategies, whilst allowing unique or location-specific risks to be appropriately addressed, and**
- **Biosecurity and food safety systems considers both current and future threats, with the agility to respond to sudden shocks (such as disease incursions or disruptions to supply chains).**

Most importantly, biosecurity and food safety activities 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 responses are timely, feasible, practical and able to deliver the desired outcomes.

AMA's role in biosecurity and food safety systems

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 support effective responses 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.

Risks to biosecurity and food safety

Australia has an international reputation as a trusted producer of high quality, and safe, food and fibre, and that reputation provides a competitive advantage in global markets. Biosecurity and food safety 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, safe 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 foot and mouth disease was detected, a vaccine would need to be imported from an overseas source as quickly as possible. It is important that our state-based and national biosecurity frameworks have 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, effective distribution networks (especially to rural and remote areas) and risk-based flexibility in satisfying non-critical regulatory requirements.

Scope of the draft Strategy

AMA notes that the draft Strategy is a high-level plan that sets out the direction for NSW's biosecurity and food safety in the future. AMA recognises that it is intended to build a collective vision and purpose that will identify key activities to guide prioritisation, decision-making and actions at the state level to support optimal biosecurity outcomes, food safety, and economic, social and environmental prosperity. AMA supports the purpose of the draft Strategy.

AMA further supports the strategic objectives identified in the Strategy to guide biosecurity and food safety actions and focus efforts in high-impact areas. These objectives support the use of risk assessment and risk-based compliance approaches to effectively allocate scarce resources to the areas where they are most needed and can deliver the greatest benefit.

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 and food safety industries will help to ensure that actions and responses are appropriate, realistic, feasible and effective.

Priorities for biosecurity and food safety systems

Biosecurity and food safety is heavily dependent on the interconnectedness of many different systems in multiple locations that integrate information and activities across national, regional, local and individual scales, both within and outside our national borders. A system is only as strong as its weakest link – a failure in one part of the system could potentially place the entire system at risk and have far-reaching impacts. It is therefore essential that activities and actions prioritise effective and efficient communication, partnership, knowledge sharing and stakeholder engagement at all scales, from local to federal level.

It is important to seek harmonisation and alignment of state/territory biosecurity arrangements wherever possible and appropriate, to improve understanding and consistent application, and encourage collaboration, especially when resources from other jurisdictions may be used in a

biosecurity or food safety response. However, AMA also acknowledges the need for a degree of flexibility and variation in the system to address specific local and regional-scale 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.

Flexibility and adaptability is needed to ensure the biosecurity and food safety workforce is appropriately trained, resourced, connected and integrated to identify, detect and respond effectively and efficiently to both direct and indirect biosecurity threats in a range of urban and rural settings across New South Wales.

Biosecurity and food safety in the future

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.

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.

Implementation and review

Successful implementation will be dependent on consultation and engagement with stakeholders, particularly those who will be directly affected by biosecurity and food safety 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.

Biosecurity and food safety threats are complex, constant and evolving, and there will be need to ensure the Strategy remains relevant. AMA notes that this Strategy *'will be subject to review when there is a notable change to the risks, challenges or opportunities for biosecurity and food safety in NSW'* (page 5 of the draft Strategy). Given that a Strategy is a high-level document that provides overall direction for the biosecurity and food safety system as a whole, the overall goals and objectives would not be expected to change substantially over short periods. However, as demonstrated by the COVID-19 pandemic, the 'usual' situation can change significantly, rapidly and with minimal warning. It would therefore be prudent to ensure that there is a shared understanding and agreement of what may constitute a 'notable change', and how such changes could be rapidly identified or detected.