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National Biosecurity Strategy Implementation Committee and National Biosecurity Strategy Integration team
Department of Agriculture, Fisheries and Forestry

Submission via Haveyoursay website:
National Biosecurity Strategy Action Plan - Agriculture hub

Dear NBS Implementation and Integration teams,

Re: draft National Biosecurity Strategy Action Plan

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

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 dollar livestock industry and $33 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 availability and safety, public health and our environment.

AMA supports the prioritisation of biosecurity on the national agenda with the development and implementation of the new National Biosecurity Strategy, the Implementation Plan and the Action Plan, to protect Australia from the harmful impacts of exotic and established exotic pests, weeds and diseases. Australia's disease-free status for many debilitating animal diseases is rare and confers significant benefits to the reputation of Australia's valuable agricultural industries. It delivers important market advantage for our producers through competitive costs of production, the production of high quality goods and industry sustainability. Biosecurity is crucial to support Australia's response to climate change, shifting and unpredictable trade and travel patterns, and changes in land use that pose multiple and complex risks to Australia's animals, people, environment, economy, livelihoods and way of life.

AMA considers that strong biosecurity can only be achieved when the following principles are embedded across the biosecurity system:

- Biosecurity activities are underpinned by science and risk assessment;
- Biosecurity responses and control measures are proportionate to the risk/s posed by an activity or disease;
- Biosecurity activities embed effective and efficient communication across the system. 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;
- 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, and has the agility to respond to sudden shocks, such as disease incursions or disruptions to veterinary medicine supply chains.

AMA supports the 6 priority areas identified in the Action Plan. However it is noted that some actions appear to duplicate those contained in other existing national strategies and action plans, especially actions related to antimicrobial resistance. AMA encourages the biosecurity sector to recognise existing national systems and frameworks that support and contribute to the broader biosecurity system, such as the *National Antimicrobial Resistance Strategy 2020 and Beyond* and the *Australian Animal Sector Antimicrobial Resistance Action Plan 2023*-2028, with a focus on linking to, and integrating with, the actions taken in other sectors, rather than overlapping or duplicating the activities of other sectors and strategies.

There are also some actions currently included in Appendix B for 'future consideration', that AMA considers should be prioritised as key actions. These have been identified below.

NBS priority area 1: Shared biosecurity culture

AMA supports the goal to build a shared culture where all stakeholders understand, care about, contribute to and take responsibility for biosecurity. Effective biosecurity depends 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 biosecurity functions, activities and actions prioritise effective and efficient communication, partnership, knowledge sharing and stakeholder engagement at all scales, from local to federal and international levels.

NBS priority area 2: Stronger partnerships

AMA supports the priority given to building stronger partnerships across the biosecurity system. Communication, transparency, mutual trust and understanding of, and between, stakeholders and contexts for biosecurity are essential. Building strong relationships across jurisdictional borders is vital, whether they be local, regional, national or international.

AMA supports efforts to protect Australia's biosecurity via engagement, monitoring and surveillance overseas in order to prevent exotic diseases and pathogens from entering Australia. The direct and indirect costs of an emergency animal disease response escalate dramatically once a disease is detected. The priority must always be to keep exotic animal diseases out of Australia, rather than trying to control or eliminate a disease post-incursion.

In Appendix B, AMA notes that partnerships should include key industry associations, including Animal Health Australia, Meat and Livestock Australia, the Australian Veterinary Association and the National Farmers Federation. These organisations are key conduits for the dissemination of trusted advice to those directly affected by biosecurity actions and responses, and engagement with them should be prioritised. Local authorities and communities are also valuable sources of local knowledge and understanding of potential risks, opportunities and resources in an area.

NBS priority area 3: Highly skilled workforce

AMA supports the focus on building a sustainable and capable biosecurity workforce. Flexibility and adaptability are 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.

The biosecurity workforce extends far beyond 'official' biosecurity roles to include multiple other critically important sectors. Veterinarians are critical in any emergency animal disease, as are the veterinary medicines and tools they use. Farmers and animal owners are at the front line and must be well informed on signs and symptoms to watch for in their animals and on their properties, and know what do to if they observe something of concern.

All Australians, including those who may not have everyday involvement in agriculture, contribute to effective biosecurity responses. For example, foot-and-mouth disease (FMD) is endemic in many places that Australians travel to or import goods from regularly, including South Africa, Indonesia, Thailand and India. Travellers to regions with endemic disease threats (to animals, plants or people) expect closer biosecurity scrutiny on their return to Australia, such as the declaration and inspection of goods that may pose biosecurity risks to Australia. The recent detection and spread of FMD in Bali, a major tourist destination for Australians, has highlighted

the need to ensure all Australians understand and respect biosecurity measures. This example also demonstrates the importance of working with international partners to control disease spread at the origin to prevent the disease reaching Australia.

Improving community knowledge of invasive plants and insects provides greater opportunities for opportunistic detections by members of the public. 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 extremely valuable.

NBS priority area 4: Coordinated preparedness and response

AMA supports a focus on improved coordination, collaboration and resource sharing across the biosecurity system. Nationally coordinated approaches to surveillance and data sharing are essential. Mutual trust and transparency across the system supports effective information sharing and allows resources need to be readily deployed when- and where-needed in order to deliver rapid and effective responses to biosecurity incursions.

Strong biosecurity is invaluable to mitigate the significant costs of responding to and controlling a preventable disease outbreak. If Foot and Mouth Disease (FMD) occurred in Australia, it would be devastating for the meat and wool industries, halting exports for at least six to 12 months and has been estimated to cost the industry up to $80 billion over ten years.[1] This would have significant impacts on both food availability and cost for domestic consumers, as well as trade partners.

Individual actions are an essential component of 'on the ground' activities that support everyday management of biosecurity risks. Engagement and understanding by individuals is essential to facilitate 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.

Climate change will pose diverse and increasing threats to biosecurity. 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 changes can also result in altered disease transmission routes. For example, if the preferential target species for a mosquito is not found in the new environment, the mosquito may target a

[1] FMD/LSD impacts on the Australian red meat industry – your questions answered | Meat & Livestock Australia (mla.com.au)

new species. Environmental stressors can also result in increased infectivity and pathogen virulence.

Biosecurity risks posed by changes to known disease distributions may be subtle and not immediately apparent, hence there is a need to ensure that biosecurity systems are responsive and capable of detecting both direct and indirect risks. The use of climate data to inform pathway surveillance is a good example of where data sharing can maximise the value gained from routine environmental and biological monitoring activities.

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' may not be 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.

If an exotic animal disease is detected, 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 and ingredients for local manufacture quickly through Australian borders, and risk-based flexibility in satisfying non-critical regulatory requirements.

NBS priority area 5: Sustainable investment

AMA recognises the importance of strong biosecurity for all Australian and our way of life. Developing and maintaining sustainable funding and investment in biosecurity should be a high priority. Research to quantify the value of various biosecurity activities may be helpful for justifying expenditure and to secure consistent, predictable funding, especially for core elements of the system.

The agricultural sector is a multi-billion-dollar industry that is critical to Australia's economy. Outbreaks of animal diseases can have catastrophic and far-reaching impacts on animal welfare and agricultural industries, with severe ramifications for the entire agricultural trade sector, domestic animal health, food affordability, food safety, public health and the environment.

Although there are already various legislative and regulatory arrangements and deeds in place to respond to animal disease outbreaks and incursions, regular review of emergency response arrangements and deeds (such as EADRAs) are important to ensure that the costings and governance arrangements in those deeds remains relevant and appropriate to enable an effective response to disease incursions.

NBS priority area 6: Integration supported by technology, research and data

Technological advances can facilitate timely, effective communication across jurisdictions and stakeholder groups, and support information sharing and monitoring activities. Better communication and data sharing will support informed decision-making and effective allocation of resources.

AMA suggests that the proposed future activity *develop a national biosecurity data strategy* is prioritised for action. There are considerable legal and ethical implications to be considered relating to data collection. It is critically important to build trust and transparency with stakeholders, particularly those who would be expected to contribute data and those who will have access to that data. Clarity on what data is to be collected, from whom, when, how and for what purpose, and the establishment of protocols for transmitting, storing, sharing and using biosecurity data, as well as privacy and confidentiality matters, must be in place from the start of data collection.

AMA would also suggest that a national diagnostic submission and testing system for notifiable, exotic and emergency animal diseases is prioritised. Barriers to testing for vets and farmers, such as cost, convenience and administrative requirements, can strongly influence the number of specimens sent for testing. This can be particularly important in the early stages of a disease outbreak when opportunities for containment may be time-limited.

We hope that the above comments will be of assistance in finalising the National Biosecurity Action Plan. Please let me know if you would like any further information.

Yours sincerely

Dr Charmian Bennett

Director, Science and Policy