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Agriculture Victoria
State Government of Victoria

Submission via EngageVictoria website for 'Strengthening biosecurity legislation in Victoria' consultation

Dear Project Team,

Re: Strengthening biosecurity legislation in Victoria

Thank you for the opportunity to provide comment on two legislative reform proposals aimed at strengthening Victoria's biosecurity framework: *Introducing a general biosecurity duty for animals and plants* and *Improving the data quality of livestock Property Identification Codes (PICs)*. We are pleased to provide the following comments for consideration by the Victorian State Government.

Animal Medicines Australia (AMA) is the peak industry association representing the registrants and approval holders of veterinary medicines and animal health products in Australia. Our member companies 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 $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, 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.

AMA recognises that climate change, shifting and unpredictable trade and travel patterns, and changes in land use pose multiple, emerging and complex risks to Australia's animals, people, environment, economy, livelihoods and way of life. 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 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 and national 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, systems 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.

Building a shared biosecurity culture

AMA supports the goal to build a shared biosecurity 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. 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.

The General Biosecurity Duty (GBD) aims to create a shared biosecurity culture, although it is unclear why a legislative instrument is required to do this. Many of the community groups identified in the GBD proposal will already be meeting or exceeding their GBD obligations, especially farmers, horticulturalists and saleyard operators, whose livelihoods depend on biosecurity.

Community engagement and uptake is likely to be much greater if a more voluntary and collaborative model is used to educate and collaborate in order to build a shared biosecurity culture, rather than a legislative tool where non-compliance could be considered an offence. Community outreach and education can deliver the desired objectives in a less bureaucratic and

administratively-demanding way, especially when focussed on groups where biosecurity risks are greatest, where general biosecurity awareness may be low and/or where new biosecurity practices or requirements are implemented.

The GBD relies on the assessment and management of risks relevant to different circumstances as identified by the stakeholder. However the ability to identify such risks and implement appropriate management responses is heavily dependent on the knowledge and engagement of individuals. Education and communication is the foundation for a shared biosecurity culture and should not require a legislative instrument to implement.

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. 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 community groups, such as gardening clubs and breeders associations, are also valuable sources of local knowledge and understanding of potential risks, opportunities and resources in an area.

AMA supports efforts to build 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.

Improving community knowledge of invasive plants and insects provides greater opportunities for opportunistic detections by members of the public. Public education in this area could be extremely valuable and cost-effective.

Regulatory settings are a critical 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, fasttrack systems to clear imported medicines and ingredients for local manufacture quickly through Australian borders, and risk-based flexibility in satisfying non-critical regulatory requirements.

AMA recognises the importance of knowing where animals are in the case of exotic disease outbreaks and supports the intention of the second proposal (on PICs data) to improve the accuracy of records. However the proposal outlines an administrative approach that will place significant demands on both the regulator and the stakeholder, but likely deliver minimal improvements for biosecurity. There is a real risk that valuable resources could be diverted to administrative tasks around data entry and management, instead of actions and responses to direct biosecurity threats. Mandatory data updates for everyone at scheduled intervals will generate a considerable workload, when a single update exercise could be undertaken followed by mandated updates when the data on record is most likely to change significantly, such as land sales.

AMA commends Agriculture Victoria for acknowledging the critical importance of biosecurity for Victoria and the wider Australian community, and the importance of working together to achieve positive outcomes. Both proposals are based on sound biosecurity principles, but the proposed models for implementation are administratively demanding for both Agriculture Victoria and affected stakeholders, with little guarantee of delivering better biosecurity outcomes. AMA wishes to emphasise the need to ensure biosecurity actions are appropriate, proportionate and targeted at the greatest risks.

Please do not hesitate to contact me if we can provide any further information.

Yours sincerely,

Dr Charmian Bennett

Director, Science and Policy