

22 August 2024

National Biosecurity Strategy Implementation Committee  
Department of Agriculture, Fisheries and Forestry  
GPO Box 858  
CANBERRA ACT 2601

Via email: [nationalbiosecuritystrategy@aff.gov.au](mailto:nationalbiosecuritystrategy@aff.gov.au)

To Whom it May Concern,

**RE: Draft National Biosecurity Strategy Action Plan 2024: Connected, Resilient, Shared**

Sheep Producers Australia (SPA) welcomes the opportunity to offer feedback on the draft action plan for the National Biosecurity Strategy.

Sheep Producers Australia is the collective national voice on issues that affect Australian sheep meat production, representing close to 20,000 sheep farming businesses. This representation is across a range of issues, including animal health and welfare, biosecurity, natural resource management, emergency animal disease outbreak preparedness, market access and assurance and industry development. Our purpose is to provide strategic leadership for Australia's sheep industry, supporting a productive, profitable and sustainable future.

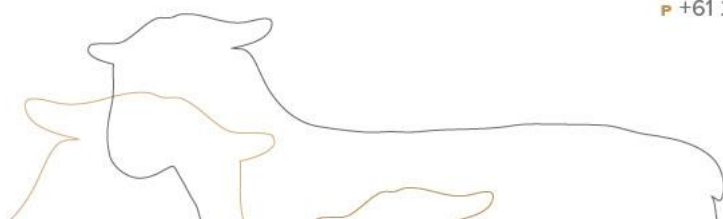
The Australian sheep industry has a long history of producing safe, quality sheepmeat for customers around the world. The success of Australia's sheep industry is underpinned by global demand from our export markets. The value of Australia's sheep meat is inextricably linked to Australia's capacity to export; therefore, we are both reliant on and protected by our national biosecurity systems and the market access that they afford. Biosecurity and animal health are a key focus of SPA's strategic plan and accompanying program of work, and SPA will continue to commit resources to improve biosecurity practices at a whole of sheep industry and individual enterprise level. Importantly, SPA is also committed to working with governments to ensure that the national biosecurity system is fit for purpose and adequately resourced to continue to deliver benefits to all Australians.

Sheep Producers Australia welcomed the Australian Government's commitment to develop our first National Biosecurity Strategy (NBS), and we strongly support the intent of the strategy to provide strategic direction for our national biosecurity system, align our collective efforts towards a common purpose and provide clear SPA commitment to prioritised action and investment. SPA commends the Department of Agriculture, Fisheries and Forestry (the department) on the spirit of collaboration with which the NBS and its supporting documents have been developed. However, more than two years have elapsed since the NBS was released, and little progress has been realised. If the NBS is to deliver on its intent, it must be underpinned by an action plan that describes meaningful, practical steps to improve the system and is broadly supported by all NBS partners.

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As outlined in the attached submission, SPA supports the draft NBS action plan subject to a number of amendments, as a first step towards delivering on the priorities of the NBS. More detail is needed on many of the actions to understand their scope and purpose. Industry and other non-government stakeholders must be clearly recognised in the plan, and critically, a robust system for assessing performance must be developed.

We call on the department and all NBS partners to use the implementation principles embedded in the original NBS document as a clear guide during action plan delivery. Essentially, implementation must be an **inclusive** process, align with and **not duplicate** other strategic agendas and activities, have **clear governance** that embeds greater stakeholder engagement in decision making, ensure **accountability** and **transparency** and focus on tangible actions to **deliver a more resilient system**. In keeping with these principles, we caution against directing limited resources towards activities that are unlikely to deliver meaningful improvements to the national biosecurity system, at the expense of substantive activities, for example those that enhance national surveillance, detection and data sharing. More detail on these and other concerns is provided in the attached submission.

Sheep Producers Australia looks forward to continuing to work with the department and other national biosecurity system stakeholders as the NBS is delivered. Should you wish to discuss this submission further please do not hesitate to contact me at [ceo@sheepproducers.com.au](mailto:ceo@sheepproducers.com.au).

Yours sincerely,



Bonnie Skinner  
CEO  
Sheep Producers Australia

# SUBMISSION TO THE DRAFT NATIONAL BIOSECURITY STRATEGY ACTION PLAN 2024

Sheep Producers Australia (SPA) welcomes the opportunity to provide feedback on the draft action plan for the National Biosecurity Strategy (NBS). SPA strongly support the intent of the NBS to provide strategic direction for our national biosecurity system, align our collective efforts towards a common purpose and provide clear commitment to prioritised action and investment. The development of the draft action plan is a commendable first step towards realising the intent of the NBS. However, the draft action plan requires amendments and strengthening to ensure the final plan is fit for purpose. It is also clear that a re-commitment to the NBS implementation principles by all NBS partners must guide the delivery of the plan.

## **Action plan implementation must maintain sight of the NBS implementation principles**

The National Biosecurity Strategy contains a sensible set of principles to guide implementation, and SPA urges the department – and all NBS partners – to maintain clear sight of these principles as the action plan is delivered. Summarised, the principles require that implementation must:

- be an **inclusive process** that includes collaboration with a broad range of stakeholders
- align with and **complement other relevant strategic agendas** and activities where possible, to **avoid duplication** and siloing of effort
- include mechanisms to ensure we are all **accountable** for implementation and that we **transparently** monitor and evaluate our progress
- focus on tangible actions in each of our priorities to deliver a **more resilient system** that can adapt to changes in our risk environment and is responsive to emerging opportunities and challenges
- have clear governance arrangements that embed opportunities for **greater stakeholder involvement in decision making**
- provide a range of different opportunities and avenues for stakeholders to provide input.

## **Agreed action plan activities must clearly contribute to a stronger biosecurity system and complement broader reforms**

Importantly, the draft NBS action plan acknowledges the considerable work already taking place across the biosecurity system and aims to build on these commitments and investments. The draft action plan is ambitious, and at the outset of implementation SPA cautions against directing scarce system resources towards activities that are unlikely to deliver meaningful improvements – such activities may distract resources and attention from more substantive and much needed improvements to the system. Priority should be given to actions and activities that strengthen preparedness, response, surveillance and diagnostics, and ensure sustainable system funding.

NBS implementation must also clearly consider and prioritise important system improvements recommended in other reviews, assessments and reports. This includes (but is not limited to) outstanding recommendations from the 2017 Craik Review of the Intergovernmental Agreement on Biosecurity, reviews by the Inspector General of Biosecurity, internal recommendations for reforming the department's biosecurity operations, and reviews undertaken by industry organisations like Animal Health Australia (AHA). For example, the upcoming AHA 5-yearly review of the National Arbovirus Monitoring Program, which can be expected to result in an expanded scope with a greater resource requirement than is currently the case.

### **The draft action plan is high level, and some key details are absent**

While the nature of the document to some extent prohibits the provision of excessive detail, this lack of detail complicates the task of commenting on the merit of individual actions. For some actions the scope and purpose are unclear, as is the linkage between the proposed activity and delivery of positive outcomes for biosecurity stakeholders. Examples include:

- NBS priority area 1, Action IA1.4 – *Develop and deliver a Biosecurity Business Network program*, by March 2025. The scope and purpose of this program is totally unclear. If the proposed program is to target a particular sector/s of private sector businesses the action plan should be amended to reflect this and should note that the government activity leaders will deliver the action “with input from relevant stakeholders” (consistent with the language used elsewhere in the action plan).
- NBS priority area 2 – IA2.3 *Review of national biosecurity governance arrangements, identifying current stakeholder involvement and where this could be expanded to strengthen positive impact*; this action appears to intersect with or duplicate IA2.5 *Review of national biosecurity decision-making bodies, identifying current industry and community involvement and where this could be expanded to strengthen positive impact*. More detail is needed to understand how these actions differ and what they will deliver.
- NBS priority area 6 – IA6.6 *Leverage the industry, community and government initiatives to support the uptake of emerging technologies, systems and processes* (due by Dec 2024). This action appears to be a space filler, and if no further detail can be provided, this action should be removed from the final plan.

Without further detail on these and a number of other actions in the draft plan our task of assessing their merit in delivering on NBS priorities is difficult. SPA recommends that the department provide further detail on individual actions in the final version of the plan, to provide stakeholders with a clearer understanding of the scope and proposed outcomes.

### **The action plan must recognise industry/government partnerships**

The final action plan must clearly recognise the role of key partners in the national biosecurity system – including Animal Health Australia, their respective industry forums, and industry bodies. The actions described under *NBS priority area 4: Coordinated preparedness and response* in particular are critical to the sheep industry and must be progressed through a genuine and open partnership between governments (Australian, state and territory governments) and industry. The final NBS action plan should reflect the importance of this industry-government partnership, including by:

- Clearly describing the government/industry partnership under NBS priority area 4.
- Requiring industry engagement in the implementation of relevant action plan activities described in Table 4.
- Adding industry, and state and territory governments to the activity leaders for the action plan activity *IA4.5 Strengthen traceability arrangements: strengthen livestock traceability through the implementation of mandatory individual electronic identification tagging (eID) of sheep and goats* (the Commonwealth is the sole activity leader in the draft action plan).

The final plan should reflect the importance of NBS actions to industry and other non-government stakeholders, and the need for clear, good faith engagement with these stakeholders as the action plan is delivered.

### **Sustainable investment actions are central to delivering on the NBS – existing industry forums should be leveraged for input on relevant actions**

As noted in the draft action plan under NBS priority area 5: Sustainable investment, the NBS states that we will ensure that sustainable investment approaches are efficient, equitable, adaptable, transparent and responsive to the changing risk environment. Sustainable investment is at the heart of the NBS and because it underpins all other actions, it is a key priority area for industry. SPA welcomes the action plan's focus on activities to build our understanding of funding arrangements, future needs, transparency, and return on investment.

The NBS action plan should recognise and describe a role for the Sustainable Biosecurity Funding Advisory Panel, established by the Minister for Agriculture, Fisheries and Forestry earlier this year. Given the broad membership of the panel, its terms of reference (to increase transparency of biosecurity funding and enable members to provide genuine input to matters related to Commonwealth biosecurity funding<sup>1</sup>), and the existing secretariat support provided by the department, it would seem sensible to utilise the panel in the delivery of relevant actions, which may include:

- IA5.1 Work together to identify funding needs and determine priorities.
- IA5.2 Establish a new Biosecurity Capability and Investment Forum, with an initial focus on delivering a long-term investment plan.
- IA5.3 Advance co-funding and investment strategies with stakeholders.
- IA5.4 Increase the transparency of biosecurity funding.

### **Performance indicators should be developed**

It will be difficult to assess the success of the NBS without defining some key performance indicators upon which Australia's biosecurity system can be reviewed and assessed to ensure it is able to protect from, respond to and recover from biosecurity issues. We urge the department and the NBS National Implementation Committee to consider the development of performance indicators for the national system and for the strategy itself, alongside a process for data collection and reporting.

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<sup>1</sup> [Sustainable Biosecurity Funding Advisory Panel Terms of Reference \(agriculture.gov.au\)](https://agriculture.gov.au)