



**SHEEP
PRODUCERS
AUSTRALIA**

National Biosecurity Strategy Project Team
Department of Agriculture, Water and the Environment
18 Marcus Clarke Street
CANBERRA ACT 2601

Via email: nationalbiosecuritystrategy@awe.gov.au

18 March 2022

Dear Sir/Madam,

Re: National Biosecurity Strategy Consultation

Sheep Producers Australia welcomes the opportunity to comment on the proposed National Biosecurity Strategy.

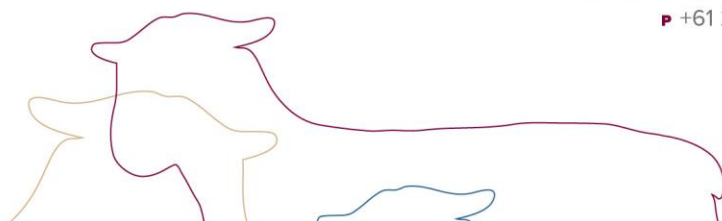
Sheep Producers Australia is the voice on issues that affect Australian sheep production businesses. As the successor entity to Sheeppmeat Council of Australia which formed in 1978, Sheep Producers Australia is the peak industry organisation representing the sheeppmeat sector. The Australian sheeppmeat industry has a long history of producing safe, quality sheeppmeat for customers around the world. The industry continues to strive through strategic planning and collaboration to be the leading supplier of lamb and sheeppmeat to global customers to meet growing demand for our premium product, the success of which has seen the total off-farm meat value grow to over \$7.2 billion¹. Sheep production is an integral part of Australia's regional landscape and communities, with lamb and mutton production contributing 8% to the total farm value of \$66.6 billion estimated in 2019-2020². Sheep Producers Australia works daily to enhance the industry's productivity, profitability and sustainability by representing all producers to industry decision-makers and stakeholders.

Through consultation with members and the broader community of sheep producers, Sheep Producers Australia has made biosecurity and animal health a key focus of its strategic plan. The focus on biosecurity is best evidenced by the levy commitments towards the National Sheep Industry Biosecurity Strategy, the Sheep Health Project, the recently completed FMD Ready project, and the activities emerging from the Emergency Animal Disease Response Agreement. Aside from these major commitments, Sheep Producers Australia has been

¹ [Meat & Livestock Australia's Fast Facts 2020: Australia's sheeppmeat industry](#)

² [ABARES Agricultural Commodities September 2019](#)

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leading the reform agenda for national traceability of livestock with other livestock peak bodies, as well as through Meat & Livestock Australia and SAFEMEAT.

The sheep meat industry is poised to enter one of the strongest eras in its history, supported by record high prices and rising sheep meat production. The success of Australia's sheep industry is underpinned by global demand from our export markets, which directly impact prices for sheep meat in Australia. 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.

Sheep Producers Australia commends the development of the National Biosecurity Strategy and acknowledges the importance of not only biosecurity at the border, but also at each individual enterprise and in each community. Australia's sheep industry relies on complex supply chains that currently make the tracking of animals difficult, which creates biosecurity risks. It is typical that during their lives, livestock often move between properties or through saleyards, agricultural shows and feedlots. In saleyards, incoming mobs are typically drafted into sale lots and then combined with other purchased lots before being dispersed over large geographical areas. The Australian sheep industry commits significant resources and policy development each year (including through compulsory levies) to assist sheep producers to improve biosecurity within sheep producing enterprises. The benefits of these actions are in turn shared across other species and stakeholder groups. Sheep Producers Australia looks forward to a continued development of biosecurity communications, resources and tools that government and industry will benefit from.

Response to the Consultation

Rather than respond to the consultation questions, Sheep Producers Australia wishes to make the following general comments on the strategy:

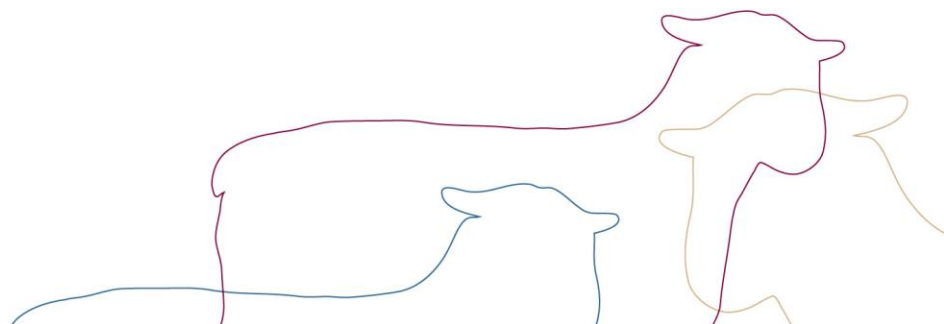
Biosecurity is everyone's responsibility

Biosecurity needs a stronger 'sell'. It is a cost of doing business, whether its actual or forecasted, and this needs to be factored into its investment, both by the public and private sector. Strong advocates and leadership on this issue is needed across all sectors.

The concept of biosecurity could be "de-mystified" by breaking it down to the two principal components of *access control* and *containment*.

Collaboration is key

There needs to be more of a focus on collaboration, as well as responsibility. Shared biosecurity culture and stronger partnerships go some way to address this, but the point could be made stronger.



Effective biosecurity is insurance

Throughout the document, it would be useful to characterise biosecurity management as an insurance policy – an investment that is made to prevent greater losses. Biosecurity practices safeguard businesses and ensure business continuity in the event of a pest, weed or disease incursion. Explaining biosecurity management is no different to fire management or any other preventative or contingency planning that may assist in articulating the rationale and focus.

Endemic disease management as a proxy for prevention of exotic disease

Although it is acknowledged in the document as out of scope, the addressing of endemic diseases may in fact be a useful proxy for looking at the prevention of exotic disease (an “endemic” disease which is absent from a particular enterprise, is in fact “exotic” to that enterprise), particularly when it comes to responsibilities on the individual, community and industry. The effective management of diseases which are currently causing damage/cost to the industry and individuals will have a multiplier effect on future diseases. Moreover, it makes the argument of quantifying risk easier if there are currently costs being realised from the management of existing disease.

Additional case studies on exotic disease management

An additional case study is recommended to refer to industry work on exotic disease management. The best example would be from FMD Ready's Sub-project 2, managed by Marta Hernandez-Jover (Charles-Sturt University) and Yiheyis Maru (CSIRO).

Biosecurity System Activities

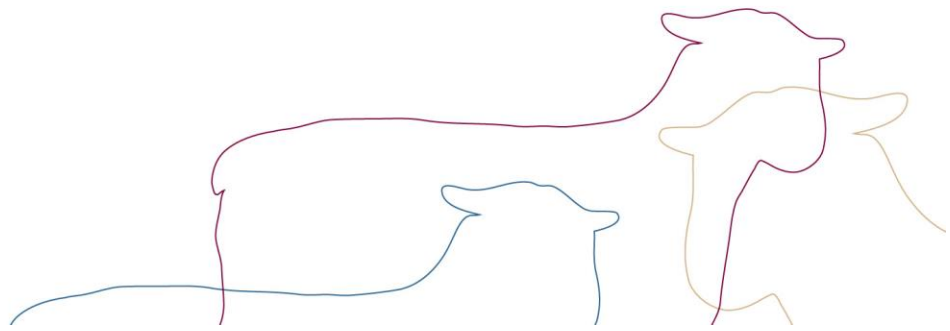
Biosecurity System Activities (pp 16-17 Table 1) does not accurately reflect the degree of involvement of stakeholders and needs reviewing, which Sheep Producers Australia would happily assist with.

Peri-urban farming

Peri-urban farming is not referenced as a social source of biosecurity risks in the section on changing or increasing biosecurity risks. The threat of peri-urban farming goes beyond ecosystem changes and urban sprawl – rather it is more of a concern when small landholders inadvertently increase biosecurity risk due to a lack of knowledge of animal disease.

National information management

When speaking about ‘evolving our national information management frameworks to ensure they are fit for purpose’, the practical realities and obstacles currently reflected in the National Livestock Identification System must be addressed. These could be improved via a commitment to consistency of data use and regulation by the state governments.



Funding of biosecurity activities

Sustainable investment and funding of biosecurity activities has always been a major barrier to 'evolving our system'. The commentary in the strategy under priority area 'sustainable investment' (p. 33) reflects the status quo of current funding approaches, and the national strategy document should signal to stakeholders that this approach will change. More realistically, new funding streams will be required.

The strategy's acknowledgement of greater equity around risk creators and system beneficiaries is welcomed. However, the reference to 'co-funding' gives an indication that biosecurity improvement is a matter of lump sum investments only, rather than as a factor of business and community cost and practice. For example, while border detection technology would be an investment, (albeit paid for by taxation, therefore co-shared), systems for biosecurity management on farm wouldn't necessarily be infrastructure changes, and therefore wouldn't necessarily be costed as a normal capital investment would.

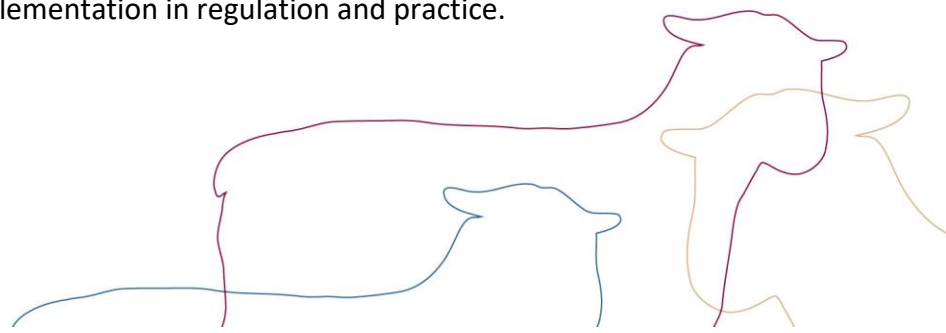
National Traceability

The strategy refers throughout to the concept of national traceability, and it is worth noting the importance of this in improving biosecurity, particularly for Australia's \$28.5 billion red meat and livestock industries. Given the inherent complexity of traceability, it is only through a high level of industry and Government cooperation and collaboration that we have any chance of strengthening and evolving to the system we need with the required level of urgency. A key principle underpinning the evolution of a traceability system must be the harmonisation of traceability standards and centralisation to create a truly national system. In recognition of a once in a generation opportunity to address long standing barriers to effective livestock traceability, SAFEMEAT has presented key reform for Australia's livestock traceability system to the National Biosecurity Committee in March 2020.

Biosecurity extension

There is a notable absence of the role of extension - meaningful targeted extension delivered by the appropriate organisations or entities - in the biosecurity landscape. Grassroots motivation and engagement at the enterprise level is critical to accelerate the adoption of practices that strengthen biosecurity preparedness and response capability. Extension activity components for each of the six priority areas must be considered in this strategy and are critical to 'evolve our system'.

A national biosecurity strategy is welcomed by Sheep Producers Australia, but it must also be acknowledged that it is an issue which has a long history of frustrations in policy development and implementation. Sheep Producers Australia has long argued for a negotiated outcome to improve post-border biosecurity, particularly the traceability of livestock, and consistent leadership is needed from all stakeholders in order to agree policy positions and commit to their implementation in regulation and practice.



Should you wish to discuss this submission further, please don't hesitate to contact me on 0412 472 710 or at ceo@sheepproducers.com.au.

Yours sincerely



Bonnie Skinner
Chief Executive Officer
Sheep Producers Australia

