

18 September 2024

Dr Michele Allan AO  
Independent Reviewer for the Intergovernmental Agreement on Biosecurity  
Department of Agriculture, Fisheries and Forestry  
GPO Box 858  
CANBERRA ACT 2601

Via email: [igabreview2024@aff.gov.au](mailto:igabreview2024@aff.gov.au)

Dear Dr Allan,

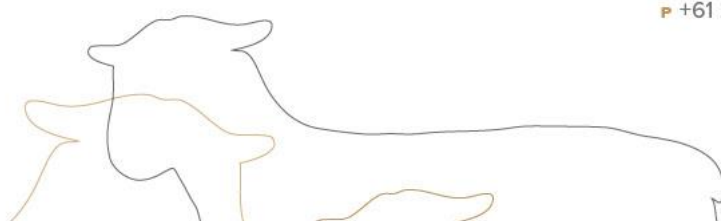
**RE: *Is the Intergovernmental Agreement on Biosecurity effective and fit for the future?* Discussion paper informing the review of the Intergovernmental Agreement on Biosecurity**

Sheep Producers Australia (SPA) welcome the opportunity to offer feedback on the discussion paper you have prepared to inform the independent review of the Intergovernmental Agreement on Biosecurity (IGAB).

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 sheep meat 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.

The attached submission outlines SPA's position on the matters raised in the discussion paper, including strong support for the stated intent of the review. We understand that the current IGAB review has a significantly refined scope, does not seek to duplicate previous, ongoing or upcoming reviews and will not consider the capacity and effectiveness of the national biosecurity system. The feedback we have provided in the attached submission is therefore focused tightly on the implementation and effectiveness of the 2019 IGAB and the questions raised in the discussion paper.



SPA is recommending that a revised IGAB adopt a One Health approach, in response to recent biosecurity events that have brought into focus the interconnectedness of human and animal health and the need for a cross-government approach to risk management to be formalised in the IGAB. We also recommend that a process be initiated to assess options for cost-sharing critical cross-jurisdictional biosecurity activities. Importantly, SPA is calling for outstanding recommendations from previous comprehensive biosecurity system reviews and assessments (referenced in the discussion paper) to be implemented as a priority, alongside any recommendations made by this review. Failure to do so is not only a missed opportunity for continuous system improvement but could undermine the good faith with which biosecurity system stakeholders engage in this and future reviews.

Sheep Producers Australia is a member of the National Farmers' Federation (NFF), and we offer our support for the submission the NFF has provided to this review. The NFF submission makes a number of broader recommendations that are informed by the experience and observations of industry stakeholders across all of Australia's major agricultural commodities.

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,

A handwritten signature in black ink, appearing to read 'Bonnie Skinner', written in a cursive style.

Bonnie Skinner  
CEO  
Sheep Producers Australia

# SUBMISSION TO THE 2024 REVIEW OF THE INTERGOVERNMENTAL AGREEMENT ON BIOSECURITY DISCUSSION PAPER

Sheep Producers Australia (SPA) welcome the opportunity to provide feedback on the independent review of the Intergovernmental Agreement on Biosecurity (IGAB) and the associated discussion paper *Is the Intergovernmental Agreement on Biosecurity effective and fit for the future?*

The IGAB is an important part of Australia's biosecurity framework, strengthening the national system through enhanced national collaboration among Australian governments. SPA strongly support the Independent Reviewer's stated intention to determine where adjustments to the IGAB are needed and make recommendations to ensure the biosecurity system operates effectively, efficiently and with sufficient responsiveness and continues to support market access for Australian products, to minimise primary production costs, and to support a healthy economy, environment and community.

Sheep Producers Australia understand that the current IGAB review has a significantly refined scope, and does not duplicate previous, ongoing or upcoming reviews. The scope of the current review is limited to evaluating the implementation and effectiveness of the 2019 IGAB and will not consider broader issues including national biosecurity system capacity and effectiveness, Commonwealth-only funding, the National Biosecurity Strategy, or biosecurity legislation. SPA has recently and will continue to provide feedback to the Australian Government on these important matters<sup>1</sup>, and note there is considerable interest and concern among stakeholders regarding broader biosecurity system issues and performance. We will restrict our comments in this submission to the scope of the review as stated in the discussion paper.

Our feedback is provided according to the structure of the IGAB review, which as outlined in the discussion paper, is centred around four elements.

## **1. Implementation and effectiveness of the IGAB**

Sheep Producers Australia support the early observations made by the reviewer, particularly regarding the shared view of the IGAB's value and necessity in setting out the framework that underpins Australia's biosecurity system. Building on these observations and the guiding questions posed in the discussion paper, SPA offer the following comments and suggestions regarding the implementation and effectiveness of the IGAB.

### The IGAB should adopt a One Health approach

Recent biosecurity events, notably the COVID-19 pandemic, and importantly also the 2022 outbreak of Japanese encephalitis virus (JEV), have highlighted the interconnectedness of human and animal health and the underpinning systems for preventing and responding to disease outbreaks. A future IGAB should explicitly acknowledge and establish a framework for managing this interconnectedness in risk, via a One Health approach. Failure to do so compromises the effectiveness of the IGAB and

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<sup>1</sup> E.g. SPA [August 2024 submission to the draft National Biosecurity Strategy Action Plan](#); [SPA May 2024 submission to the Senate Inquiry into legislation to establish a Biosecurity Protection Levy](#), SPA membership of the Sustainable Biosecurity Funding Advisory Panel, [SPA November 2022 submission to DAFF discussion paper on delivering a sustainable biosecurity funding model](#).

associated national systems, resources, agreements and plans in responding to (and preparing for) emergency animal disease incidents in Australia.

This proposal is in keeping with the spirit of the current IGAB, which states under Clause 4 (Preliminaries) that *'The Parties support a whole-of-government approach to biosecurity, covering areas including trade, agriculture, forestry, fisheries, tourism, the environment, social amenity and human health.'* The IGAB also observes (Clause 7) that one of the looming challenges for the biosecurity system is a changing risk environment that is *'increasing the risk of zoonoses impacting on human health.'* However, given recent experiences, particularly with the response to the zoonotic JEV, it is clear that a formal adoption of a One Health approach is needed in the IGAB. This should foster collaboration, coordination and communication between the agriculture and human health sectors, and ultimately a more effective and efficient biosecurity response system. The 2022 National Biosecurity Strategy also makes the point that the JEV outbreak *'clearly demonstrates the importance of using a One Health approach to addressing risks.'*<sup>2</sup>

SPA acknowledges existing Australian Government One Health initiatives, including through inter-agency agreements and activities involving the Department of Agriculture, Fisheries and Forestry and federal agencies responsible for human health. The revised IGAB should commit *all* parties to adopting a One Health approach and provide for the practical implementation of that approach in the agreement's governance.

**Recommendation 1: The revised IGAB should clearly acknowledge the interconnectedness of human and animal health and commit parties to adopting a One Health approach for managing biosecurity risk. IGAB governance arrangements should reflect the One Health approach.**

#### Clarification of language in the IGAB

Noting one of the key considerations of the independent reviewer will be whether the language used in the agreement is appropriate, clear and contemporary, SPA offers the following minor suggestions:

- Clause 5 (under 'Preliminaries') states *'... This Agreement does not apply to major animal-borne diseases of humans such as malaria that are primarily managed by Australian and international health agencies.'* The terminology used in this statement requires clarification in a new iteration of the IGAB, given the emerging challenge of zoonotic malaria.
- Clause 23b (under 'Components of the System') lists *'national lists of exotic priority pests and diseases (for animals, plants and the environment and community).'* It isn't clear what is meant by 'community' in this context, and whether this means human diseases. This creates vagueness and uncertainty around the scope of the IGAB.
- Clause 33 ('Core Commitments of the Parties') is a critical component of the agreement, and holding Parties to these commitments is of strong interest to industry and the community. The language is clear, however should reflect that biosecurity status changes (i.e. when new incursions are reported, or when eradication is achieved), and IGAB signatories should commit not only to maintaining but improving biosecurity status by delivering on eradication and containment programs.

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<sup>2</sup> National Biosecurity Strategy 2022, <https://www.biosecurity.gov.au/about/national-biosecurity-committee/nbs>

### IGAB principles and commitments are clear, but implementation not always effective

As stated above, the Core Commitments of IGAB Parties (Clause 33) are clear and well framed, albeit very high level. Delivering on these commitments is less straightforward, particularly given the non-binding nature of the IGAB. Consideration should be given to how the IGAB can better support Parties to deliver on these admirable and critically important commitments and be held to account on doing so. One option may be for the revised IGAB to be more detailed and prescriptive regarding what Parties are committing to. Accountability measures could also be considered.

The same comment applies to the *Key biosecurity principles* (Clauses 12-20), which as the reviewer observes, are timeless. SPA welcomes the opportunity that this review provides to give some air and a renewed commitment to the IGAB's biosecurity principles.

### Parties must be supported to manage multiple and increasingly complex incursions

Clause 7 (under Preliminaries) acknowledges the changing biosecurity risk profile, including the increased risk of pests and diseases entering and establishing in Australia, including zoonoses. Recent experience has borne this out, with multiple incursions being managed across Australia at any one time, and the concurrent need for action to address heightened threat of priority pests and diseases such as FMD and lumpy skin disease entering Australia. The discussion paper notes that the biosecurity system is under significant stress as incursions and responses are growing in number and complexity. The review should consider how a revised IGAB could better equip Parties to manage their responsibilities in this challenging environment, including where Parties are managing new and existing incursions that require sustained longer-term investment in containment and management.

#### **Recommendations**

- 2. Language used in the revised IGAB should address uncertainty around the scope of the agreement, particularly as it relates to zoonoses and human health.**
- 3. Consider developing more prescriptive Core Commitments for IGAB Parties, to provide clear direction and better support effective, consistent delivery.**
- 4. Consider how a revised IGAB can better equip Parties to deliver on their responsibilities as incursions grow in number and complexity.**

#### **2. Existing and future cost sharing arrangements**

The early observations of the independent reviewer regarding funding are incisive and succinct and are strongly supported by SPA. The national system relies on all states and territories and the Commonwealth independently seeking and allocating funding to biosecurity activities (which are in the national interest). Post-border, cross-jurisdictional biosecurity activities in the areas of prevention, preparedness and surveillance – which have a high return on investment and underpin the biosecurity system – lack substantive national agreements or a structured approach for their ongoing funding and delivery. Similarly, an ad hoc national approach to funding for management of established pests and weeds, which have a significant impact on agriculture, the environment and community, limits the effectiveness of those activities. There are examples of effective, formalised and cost-shared programs for post-border surveillance activities, including the National Arbovirus Monitoring Program managed

through Animal Health Australia, which should be examined in any consideration of potential new funding arrangements for broader cross-jurisdictional biosecurity activities.

**Recommendation 5: Initiate a process to examine potential new funding arrangements for critical cross-jurisdictional activities not covered by existing emergency response deeds, including prevention, preparedness and surveillance.**

### **3. The impacts of COVID-19 on the functioning of the IGAB**

The implication in the discussion paper could be read as COVID-19 being an event external to the IGAB. Consistent with comments earlier in this submission, the tendency towards differentiation of human and animal diseases could be redressed to better account for the many areas of interconnectedness, particularly when considering zoonoses such as swine/equine/avian influenza, and JEV.

SPA support the observation in the discussion paper that the COVID-19 pandemic shone a spotlight on the importance of biosecurity but note with concern the observation that COVID-19 'clouded' other biosecurity emergencies, resulting in delayed reaction times or poor prioritisation of responses. We recognise that Australia faces an increasing likelihood of more frequent, complex and severe incursions, including the growing probability of multiple concurrent biosecurity incursions. In this scenario, Australia's biosecurity system would struggle to effectively respond to multiple simultaneous biosecurity incursions, especially when combined with public health emergencies.

The observation that the pandemic '*showed how the country can work together and adapt to achieve results*' is in some ways optimistic, given the divergent approaches of state governments, which created significant disruption and as observed in the discussion paper created substantial administrative burden for biosecurity agencies undertaking duties across state borders (some jurisdictions reporting the need to apply for up to 300 permits a day).

**Recommendation 6 : The next IGAB include a clause to acknowledge the importance of efficient interstate movement to facilitate delivery of biosecurity functions (for example, under 'Responsibilities of the States and Territories' or ' Interstate trade responsibilities').**

### **4. Not duplicating efforts from previous and ongoing reviews**

Sheep Producers Australia understand that the current IGAB review has a significantly refined scope, and does not duplicate previous, ongoing or upcoming reviews. The biosecurity related reviews and initiatives summarised in Table 2 of the discussion paper incorporate comprehensive and authoritative assessments of the system, and outstanding recommendations must be actioned by the Australian Government as a priority. Failure to do so is not only a missed opportunity for continuous system improvement but could undermine the good faith with which biosecurity system stakeholders engage in this and future reviews.

**Recommendation 7: Outstanding recommendations from previous biosecurity system reviews listed in Table 2 of the discussion paper should be implemented as a priority.**