



Victorian Biosecurity Strategy Consultation

Submission of the
Australian Veterinary Association Ltd

August 2023

The Australian Veterinary Association (AVA)

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. The AVA consists of members who come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals, such as cattle and sheep, and wildlife. Government veterinarians work with our animal health, public health, and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.

Veterinarians play key roles in Australia's and Victoria's biosecurity system, in government, industry and at the 'front line' in private clinical practice.

Discussion

The AVA acknowledges the wide stakeholder engagement involved in the process of developing the consultation draft of the Victorian Biosecurity Strategy (the Strategy), including with the veterinary profession, and commends Agriculture Victoria on the approach taken for its development.

In general, the scope and content of the draft Strategy is supported, though it is noted that there are some 30 pages of 'scene setting' before the strategic way forward and priority actions are presented. The Strategy may have more impact if it 'cut to the chase' earlier in the document. There may be value in considering reducing this background information, including for example by placing some of it in a companion or supporting document, with the actual Strategy being more succinct and impactful.

We support the strategy's broad goals and strategic actions, noting that these Goals coincide with key elements of the biosecurity continuum (prevention, preparedness and response, and management of established pests/diseases), while also including the highly important goals of stronger Partnerships, and strengthened 'Enablers' of the system. Importantly, the goals of stronger partnerships is particularly relevant to the veterinary profession and indeed essential for successful biosecurity, given the veterinary profession is predominantly private practice, providing significant public good.

It is noted that many of the Case Studies refer to outbreaks of pests or diseases – actual responses or potential impacts. There are a number of programs and activities that aim to enhance early detection of emergency diseases, and while not perfect, these represent real examples of how working with key stakeholders and businesses can produce wider benefits. In this context, the Victorian Significant Disease Investigation Program which supports veterinary practitioners to undertake otherwise unprofitable disease investigations, would make a valuable case study.

Private veterinary practitioners across Victoria (and of course Australia) play a key role in surveillance, and partnership with the veterinary profession is essential to ensure enhanced effectiveness of that role. Private veterinarians also form a large, highly qualified, and experienced corps of animal health professionals to directly contribute to surge capacity in emergency disease incursions, and responses to other animal welfare and animal health emergencies, such as natural disasters. The AVA is a appropriate and willing external partner through which the State government can access, and communicate with, private veterinarians.

We support the important inclusion of 'mitigation' in Goal 2, and indeed would encourage strengthening of this element in the Strategy. This is particularly because the draft places the highly important surveillance activities for early detection of pest/disease incursions, under this goal. It is important for this to be emphasised in Victoria's biosecurity strategy as surveillance for early detection is a core constitutional and jurisdictional role of States, with primary *prevention* (of emergency pests/disease entry) being a core role of the Australian government.



We believe the draft Strategy should more strongly signal, as a Priority Action under Goal 2, the substantial benefits that can be achieved from harnessing, and as necessary incentivising, those individuals, and businesses whose normal activities can directly contribute to enhanced biosecurity outcomes. This includes placing obligations on (but also supporting) businesses whose activities create biosecurity risks, for example contractors and utilities providers moving between rural properties, but also businesses which, with support, can cost effectively enhance surveillance, for example private veterinary practitioners. Support and incentivisation in this latter case is important, as normal commercial arrangements between private veterinarians and producers can be insufficient to cover the costs of the 'public good' component of enhanced surveillance work creating vulnerability.

The AVA acknowledges and commends the Victorian Significant Disease Investigation Program (VSDIP), which seeks to harness the everyday work of rural veterinary practitioners to enhance animal disease surveillance. However, participation by veterinary practices could be improved, and many veterinarians believe the administrative costs associated with the program act as a deterrent to participation. The AVA would like to see the priority activities under Goal 2 include more direct reference to further improving and enhancing subsidised surveillance programs such as the VSDIP, as an effective means of enhancing early detection of emergency pests/diseases through private veterinarians and encouraging the partnerships with producers for this goal.

We strongly support the acknowledgement in the Strategy's Goal 3 that ensuring adequate surge capacity requires having in place arrangements to access external specialised skill and capabilities. Private veterinarians represent a vital and incomparable source of expertise and infrastructure, and we acknowledge Agriculture Victoria's efforts to date in this regard. We also support the recognition in the strategy that partnerships – such as with the veterinary profession for vital response assistance – need to be supported by involvement in emergency response training and in particular, scenario-based exercises. Including representatives of the private veterinary sector in training and exercises enhances the understanding and 'readiness' for a real incursion response.

In this context, the case study on a recent Avian influenza outbreak response in our view misses an important opportunity to highlight the valuable role provided by private veterinary practitioners in assisting the response. A considerable amount of the surveillance activity during that response was undertaken utilising private veterinarians as an essential component of the surge capacity, and we respectfully suggest that this aspect of the avian influenza response should be included in that case study, being an ideal example of many of the 'partnership' and 'working together' themes of the strategy, as well as the utilisation of external skills and capabilities to improve response capacity.

The AVA looks forward to further engagement with Agriculture Victoria in support of veterinarian's role in biosecurity and food safety, and their critical part in preparing and responding to EAD outbreaks, as implementation of the priority actions of the Strategy proceeds.

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