

Intergovernmental Agreement on Biosecurity Review

Submission from the Australian Veterinary Association Ltd



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About us

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 9000 members 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.

Summary

In this submission, the AVA have concentrated on those aspects of the Intergovernmental Agreement on Biosecurity (IGAB) relevant to roles and responsibilities of parties in the national biosecurity system, and on how the concept of a shared biosecurity responsibility can be better understood and implemented. Our major area of concern is ensuring Australia has the required capability and capacity to address biosecurity risks and priorities, and that there is optimal allocation and availability of resources to ensure this. We provide some general comments on these matters followed by direct answers to the review questions.

Our submission concentrates on three key areas which are essential to ensuring adequate surveillance capacity and thus maintaining Australia's favourable disease status: (i) ensuring an adequate, strong and effective government veterinary workforce, (ii) partnerships with private veterinarians to enhance surveillance capacity, and (iii) ensuring government veterinary laboratory capacity.

General Comments

Government veterinary workforce

It is essential to maintain a sustainable, quality veterinary public service, both federally and at state level. The AVA's 2015 workforce modelling report¹ and more recently the OIE PVS Evaluation Report on the Australian veterinary service², show clearly that we are heading towards a significant undersupply of government veterinarians.

Governments need to be proactively employing and training younger graduates to fill the gap as older government veterinarians retire, and governments should also be investing in the development and retention of those already working in government roles to ensure their expertise is not lost. This includes veterinarians in field, policy and laboratory positions. There should be no further closure of government veterinary laboratories. These roles are critical to biosecurity, food safety and our agricultural industries.

Private veterinary practitioner role in biosecurity

Disease surveillance is the key to early detection and validating disease status. Due to the decline in government veterinary services, particularly those out in the field, private veterinary practitioners must supplement government activities to ensure that adequate surveillance is maintained. On-farm veterinary visits are critical for herd health, biosecurity, animal welfare and disease detection, and are an important means of reinforcing government veterinary services. To this end, the AVA recommends:

- Promoting awareness and participation of private veterinary practitioners in schemes such as APAV, TSE Freedom Assurance, and NSDIP to lead to enhanced surveillance capacity. The AVA is willing to work with state governments to overcome current barriers and promote engagement of private veterinarians in the NSDIP program in each jurisdiction.

- Increased funding of the NSDIP scheme is also recommended, as well as funding for training initiatives to ensure improved surveillance, disease investigation and exotic disease awareness.

Training and technology

- Moves away from zoning and quarantine to on-farm biosecurity and vendor declarations require greater access to information and training of farmers and their advisors, including veterinarians.
- Information sharing, public awareness and rapid detection and response to emergency animal diseases (EADs) can be facilitated by greater use of social media and smart communications technology, AVA is partnering with Animal Health Australia (AHA) to develop the “Animal Disease Alert App” for smart phones to improve farmers’ willingness to report and engaged with private practitioners. These types of initiatives into the future, including rapid field diagnostics and reporting will assist in improving Australia’s biosecurity.

Consolidated list of questions

The IGAB

- 1) *Is the IGAB a suitable mechanism to underpin Australia’s national biosecurity system in the future (10 or 20 years from now)? Are the consolidated priority areas still appropriate?*

Yes

- 2) *What are your views on the construct, effectiveness, and transparency of the IGAB? Please provide examples.*

The IGAB provides for open discussion and cooperative decision making between affected parties, governments, industry and involved parties. Links to the wider communities are less clear.

- 3) *What practical improvements to the IGAB and/or its structure would provide for an increased, but accountable, role for industry and the broader community?*

AVA and NGOs current access is via industry peak bodies. Direct access and involvement in the decision process would bring veterinary expertise to the table directly and assist with better implementation of biosecurity activities.

Agreeing to risks, priorities and objectives

- 4) *Is the goal, and are the objectives, of Australia’s national biosecurity system still appropriate to address current and future biosecurity challenges?*

Yes

- 5) *In order of importance, what do you see as the most significant current and future biosecurity risks and priorities for Australia and why? Are Australia’s biosecurity objectives appropriately tailored to meet these risk and priorities?*

Diseases introduced through ineffective biosecurity risk analyses, articles imported legally or illegally, bioterrorism, passengers baggage and naturally (insects on wind, changing vector distribution or moving flying fox populations). Time lag in identifying an incursion due to ineffective surveillance. The current objectives cover these risks and priorities.

- 6) *Are the components and functions of Australia’s national biosecurity system consistently understood by all stakeholders? If not, what could be done to improve this?*

There would be benefit in elimination of operational and awareness gaps. Direct engagement of the AVA would increase communication to veterinary stakeholders.

- 7) *What benefits (or impediments) are there in realising a more integrated national approach to biosecurity, agreed to by key partners in Australia’s national biosecurity system?*

An example of an impediment is independent state training operations without central (national coordination) – e.g. EAD and surveillance training could be centrally coordinated to ensure best use and sharing of resources.

- 8) *What form would this best take (for example, a national statement of intent or national strategy)? What are the key elements that must be included? What specific roles do you see industry and the broader community playing in such an initiative?*

A national strategy based on the principles of IGAB that is publicly available and used as the basis of biosecurity risk analysis and trade negotiation, performance appraisal and public awareness campaigns.

Embedding shared responsibility

- 9) *Are the roles and responsibilities of stakeholders in Australia's national biosecurity system clearly and consistently understood? How might this be improved?*

Yes

- 10) *What practical actions do you think governments and industry organisations can undertake to strengthen the involvement of industry and community stakeholders in Australia's national biosecurity system? Would increased involvement in decision making on and implementation of biosecurity activities help the adoption of shared responsibility?*

Yes, increased involvement in information sharing and decision making would help.

Funding biosecurity

- 11) *Are the IGAB investment principles still workable? Do they still meet the needs of Australia's national biosecurity system now and in the future?*

Yes broadly speaking.

- 12) *Are governments and industry investing appropriately in the right areas? Are there areas where key funders should be redirecting investment? Can investment in biosecurity activities be better targeted? If so, how? Please provide examples.*

State governments are moving away from disease control, extension and animal welfare enforcement. Market access programs and industry risk analyses, vendor declarations and farm biosecurity are replacing traditional quarantine measures of zoning, movement controls, attendance at sales and the like. This creates greater demand for technical information from producers. Private providers / consultants can be accessed but their skill sets are largely unknown to producers. Veterinary practitioners can and already provide services but need training and research and support.

The Australian Veterinary Reserve (AVR) provided means of rapid response to EADs but greater reliance is placed on "just in time" training. Foot and mouth disease outbreaks in UK and elsewhere show that this is not adequate and how quickly trained resources are exhausted.

Funding for AVR is largely lost and practitioners who will be crucial in EAD outbreaks need to be trained and updated.

Funding for NSDIP should be enhanced to provide increased opportunity for significant disease investigation and laboratory sampling. Training should be more accessible for private practitioners to enhance their role in surveillance.

- 13) *How do we ensure investments and investment frameworks align with priorities, while being flexible enough to address changing risks and priorities?*

Currently industries are trying to fill the gaps in (12) above through Livestock Biosecurity Network (LBN) and surveillance measures. Certain programs like the spongiform encephalopathy programs (scrapie and BSE exclusion) required for Australia's disease status for trade access are in place. However in reality they are minimalist. Programs for government funding of surveillance and diagnoses of significant diseases and suspected EAD outbreaks are minimal, complex and hard to access (e.g. NSDIP).

- 14) *Are current biosecurity funding arrangements still appropriate to meet the needs of Australia's national biosecurity system, now and in the future? What might an alternative or novel funding model encompass?*

The Beale Review of Quarantine and Biosecurity recommended more than \$200 m for IT systems to support quarantine measures, particularly allocation of resources to areas of greatest risk. This was agreed in principle by the government of the day but remains largely unfunded.

- 15) *What can be done to ensure an equitable level of investment from all stakeholders across Australia's national biosecurity system, including from risk creators and risk beneficiaries?*

Risk creators tend to be beneficiaries e.g. through imports of products, but rarely contribute to funding. Importers of pig meat create an EAD risk but risk and costs are largely borne by the Australian industry. Importers should have to fund addressing of the risk via import risk analysis and an operational levy.

Market access

- 16) *Are market access considerations given appropriate weight in Australia's national biosecurity system? What other considerations also need to be taken into account?*

National asset protection (farms). Plants and animals and environmental health - currently largely unfunded. Potential bio-terrorism and public health. Dog mediated rabies is getting closer to Australia and we are constantly at risk from visiting yachts and commercial vessels. Containerisation and the need to inspect just a sample of them constitute a risk.

- 17) *Are there ways governments could better partner with industry and/or the broader community to reduce costs (without increasing risk), such as industry certification schemes?*

AVA recognises that industry schemes and Approved Biosecurity Arrangements are provided for in the new legislation. Incentives for good performance supplement sanctions.

- 18) *How can the capacity and capability of surveillance systems (including diagnostic systems) underpinning Australia's national biosecurity system be improved?*

Surveillance, active and passive, underpins disease status assurance and certification and thus market access. Governments need to share costs more widely and fund programs like NSDIP more generously.

Ensuring an adequate, effective government veterinary workforce across Australia is essential to underpinning our national animal biosecurity system.

Equally due to the already declining government veterinary services, the AVA believe that private veterinary practitioners must supplement government activities. On-farm veterinary visits are critical for herd health, biosecurity, animal welfare and disease surveillance, and are important means of reinforcing government veterinary services. To this end, the AVA recommends:

- **Promoting awareness and participation in schemes such as APAV, TSE Freedom Assurance, and NSDIP to lead to enhanced surveillance capacity. The AVA is willing to work with state governments to overcome current barriers and promote engagement of private veterinarians in the NSDIP program in each jurisdiction**
- **Increased funding of the NSDIP scheme is also recommended, as well as funding for training initiatives to ensure improved surveillance, disease investigation and exotic disease awareness.**

The role of research and innovation

- 19) *Which specific areas of Australia's national biosecurity system could benefit from research and innovation in the next five, 10 and 20 years and why? Please provide examples.*

Systems and operational research would assist in getting the best measures. Benchmarking and performance appraisal has proven difficult but is necessary for peak performance and assurance of efficient resource allocation and meeting of government objectives. Such measures should generally be outcome-based but we recognise that in some areas input measurement can be valuable e.g. in epidemiologically based monitoring of performance.

- 20) *How can coordination of biosecurity-related research and innovation activities be improved?*

- 21) *How can innovation (including technology) help build a more cost-effective and sustainable national biosecurity system?*

Greater use of social media and smart phone technology and rapid diagnostic and identification testing – crush side / field tests that are cheap and provide real time answers.

Measuring the performance of the national biosecurity system

- 22) *What does success of Australia's national biosecurity system look like? How could success be defined, and appropriately measured (that is, qualitatively or quantitatively)? What, if any, measures of success are in use?*

A successful biosecurity system would have adequate capacity for surveillance and response to significant animal diseases. This can be achieved in part through (i) ensuring an adequate, strong and effective government veterinary workforce, (ii) partnerships with private veterinarians to enhance surveillance capacity, and (iii) ensuring government veterinary laboratory capacity. The OIE PVS Tool is one mechanism to assess competency in these areas.

- 23) *What would be required to ensure data collection and analysis meets the needs of a future national biosecurity system? Who are the key data and expert knowledge holders in the national biosecurity system?*

Data collection is resource consuming and costly. It is best directed to areas of greatest return. AVA believes that further research is needed, the nature of which should be established in consultation with stakeholders. Greater use of electronic reporting and technology is recommended.

- 24) *How can existing or new data sets be better used? How might data be collected from a wider range of sources than government?*

Non-government data can contribute greatly. One example is veterinary practice databases which provide a picture of activity and findings that may or may not be reportable but which are valuable and cheap. VetCompass Australia run by Sydney University Veterinary Faculty is one such mechanism that collects small animal disease information. Progressing the Animal Health Alert app will also contribute to this process of reporting and data collection.

¹Thinc Health, (2015) Australian veterinary workforce modelling report. Available at: http://www.ava.com.au/sites/default/files/AVA_website/pdfs/Australian%20veterinary%20workforce%20modelling%20report.pdf

² OIE PVS Evaluation Report on the Australian veterinary service (2016) Available at: http://www.oie.int/fileadmin/Home/eng/Support_to_OIE_Members/docs/pdf/FinalReport_PVS_Australia.pdf