

16 August 2023

Matt Lowe
CEO
Agriculture Victoria
Department of Environment, Energy and Climate Action
Melbourne



By email: SVBSprogram@agriculture.vic.gov.au

Dear Mr Lowe,

RE: Victorian Biosecurity Strategy Consultation

The Victorian Farmers Federation (VFF) appreciates the opportunity to provide this submission to the Department of Energy, Environment, and Climate Action (DEECA) regarding the new Victorian Biosecurity Strategy.

As the voice of Victorian farmers, the VFF acknowledges DEECA's commitment to enhancing and fortifying the state's biosecurity system. A comprehensive Biosecurity Strategy is pivotal for the Victorian agriculture sector as it plays a vital role in preserving productivity, preventing the entry and spread of detrimental pests and diseases, securing market access, and promoting the industry's overall sustainability.

Our members have shown a keen interest and active engagement in this matter. Notably, Ashley Fraser, Danyel Cucinotta, and Gerald Leach from VFF have expressed their appreciation for the collaborative spirit in which this strategy has been developed. Their interactions within the biosecurity reference group have been valued, highlighting the crucial role such engagements play in shaping an effective strategy.

While the proposed biosecurity strategy addresses the main aspects concerning the biosecurity challenges faced by Victoria, we have some comments and suggestions related to the proposal, which are elaborated upon in the following sections.

General Comments

Biosecurity is a multifaceted issue that extends beyond the realm of agriculture, impacting diverse aspects of the economy, environment, human health and the broader community. It is a shared responsibility that needs a comprehensive and all-encompassing approach that is led by the government to manage and mitigate risks effectively. The strategy acknowledges this, aiming to address biosecurity as a state-wide concern that involves all sectors and aspects of the community.

However, the strategy could benefit from further emphasising clearly defined, measurable outcomes. Central to this should be an in-depth risk assessment process, accompanied by a more pronounced focus on biosecurity within public lands and urban areas. Moreover, these foundational elements should be complemented by targeted actions to aid farmers and the agricultural sector, a meticulous plan for community and industry engagement, and clear provisions regarding funding.

The strategy should also balance regulatory measures with proactive, collaborative, and risk-based measures to ensure a resilient and effective biosecurity system. This will ensure that all stakeholders, including farmers, are equipped with the knowledge and resources they need to manage biosecurity risks effectively.

Strategy Outcomes and Objectives

- The broad strategic goals outlined in the draft, encompassing prevention, response, management, partnerships, and enablers, are acknowledged. However, the strategy would benefit from the inclusion of clearly defined, measurable outcomes aligned with each strategic goal.
- The strategy should delineate specific actions to support farmers in implementing biosecurity measures.
- Ongoing research into biosecurity threats to agriculture and the development of innovative prevention and management strategies should be a key component of the strategy.
- It is proposed that the strategy includes a detailed timeline outlining the implementation of each action and the parties responsible.

Risk Assessment

- A more detailed explanation of the risk assessment and mitigation process is needed.
- Specific processes related to agricultural biosecurity risk assessment should be delineated.
- A transparent and inclusive process for resource allocation based on risk assessment should be established.
- Collaboration with other stakeholders, such as other government departments, industry groups, and the community, is essential in the risk assessment process.

Public Land and Urban Biosecurity

- A more explicit focus on public land and urban biosecurity considerations is necessary.
- Outlining specific measures to manage biosecurity risks on public land and urban areas would strengthen the strategy.
- Consideration of the role of urban residents and public land users in biosecurity is crucial.
- Collaboration with local government and community organisations could be a key component of the approach to public land and urban biosecurity.

Funding Provisions

- It is essential that the strategy provides specific details regarding the source, amount, and allocation of such funding.
- It is crucial to allocate adequate funding to support the government and farmers in implementing practical biosecurity measures.

- Farmers and their representative bodies should be involved in decision-making processes related to biosecurity, including funding decisions.
- The strategy should ensure that its provisions do not disproportionately favour only large-scale agricultural businesses.
- Clear, accessible information about biosecurity risks and measures is necessary.
- A portion of the funding should be allocated towards research and development to improve biosecurity measures and technologies.
- The state's role as a significant landholder should be considered, emphasising equitable cost-sharing in biosecurity management to avoid a 'free-rider' situation.

Community and Industry Engagement

- A more detailed plan for engaging with the agricultural sector specifically would strengthen the strategy, given its critical role in biosecurity.
- Outlining specific actions to support farmers in implementing biosecurity measures is recommended.
- A more detailed plan for collaboration with peak industry bodies to promote biosecurity and support farmers would be beneficial.
- The strategy should also outline how it will measure and evaluate the effectiveness of its community and industry engagement efforts.

Specific Comments

1) Figure 1 | Summary of strategic goals (page 5)

Strategic Goal #1 – add:

- Work with farmers to understand and support biosecurity priorities for the industry.
- Work with crown land managers to ensure they manage risks and control spread from crown land.

Strategic Goal #2:

- *Add:* Recognise the role of Government as owner/manager of one-third of the state.
- *Change for* (second bullet point): Encourage good practice and compliance through the judicious use of incentives and discouragement.

Strategic Goal #3 – add:

- Ensure registration of campers on Crown licensed water frontages to ensure traceability.

Strategic Goal #4:

- *Change* (lead statement): Supporting local collective action, bringing together all the participants and affected parties in order to achieve sustainable, long-term, whole-of-landscape changes.

- *Add:* Ensure adequate resourcing for managing pest plants and animals on Crown land.

Strategic Goal #5 – add:

- Lead by example through embedding excellence in biosecurity in the management of Crown land and the legislative objectives of Crown land legislation.

2) Figure 2 | List of priority actions (page 6)

Strategic Goal #1 – add:

- Ensure the preparation of Integrated Pest Plant and Animal Plans by CMA.
- Promote and support community, industry-led and Traditional Owner, place-based or sectoral-based action by all land tenure for priority issues identified in IPPAP.
- Support collaborative governance approaches for greater community, industry and Traditional Owner involvement in decision-making, including support to enable effective participation.

Strategic Goal #2:

- *Add:* Establish biosecurity objectives for Crown land.
- *Add:* Report annually on achievement against CALP Act requirements and biosecurity objectives on Crown land.
- *Adjust* (point 6): Improve the compliance ~~and enforcement~~ toolkit of regulatory and non-regulatory approaches to incentivise good biosecurity practices and better deter non-compliant behaviours.

Comment: To use the words “and enforcement” after the word compliance turns an appositive approach into a negative one. Enforcement is not compliance; it is the last resort tool in trying to achieve compliance and is usually a sign of failure.

Strategic Goal #3 – add:

- Establish QR code check-ins for rail trails and camping areas adjacent to agricultural land to improve traceability.

Strategic Goal #4 – add:

- Ensure appropriate dedicated funding for the management of biosecurity on Crown land.

Strategic Goal #5 – add:

- Model excellence in biosecurity management on Crown land.

3) Management and Control (page 11)

Traditional Owners, as custodians of the land, care for and heal Country, by protecting culturally significant and ecological sites from the impacts of established weeds and animal pests.

- How does the strategy address the challenge of reinfestation of pest plants such as wheel cactus from Crown land and the role of these plants as a vector for fruit fly?

4) Strengths of Victoria's biosecurity system (page 12)

- How does the strategy account for the potential spread of biosecurity risks due to untraceable factors such as wildlife or tourists?

5) Figure 3 | Performance of Victoria's Biosecurity System in 2021-22 (page 12)

- This part appears to lack a dedicated section addressing the critical issues related to seed and breed management on Crown land.

6) Industry and government joint response is carried out to effectively manage the 2020 avian influenza outbreak (page 13)

- The strategy could be enhanced by incorporating a more diverse range of case studies, such as those related to deer and wheel cactus, to underscore the importance of cross-tenure actions.

7) Our way of life (page 16)

Pests and diseases pose a threat to general way of life and social wellbeing of Victorians.

- The strategy should provide a more comprehensive analysis of the costs of managing endemic species. For instance, in 2016, the cost of managing weeds alone was estimated at \$900 million per annum in Victoria, yet the funding allocated to Parks Victoria for this purpose was a mere \$7 million, which has since been reduced. This stark contrast underscores the strategy's need for adequate funding and resource allocation.

8) Case studies (pages 17, 18 and 19)

- The inclusion of additional case studies, such as those focusing on rabbits, gorse, serrated tussock, blackberry, wheel cactus, deer, and others, would provide a more comprehensive view of the diverse biosecurity challenges faced in Victoria. These case studies could offer valuable insights into the complexities of managing different biosecurity threats and the strategies required to address them effectively.

9) Environmental changes (page 21)

- Given the rapid environmental changes and their impact on our native flora and fauna, could the strategy emphasise managing endemic species?

10) Trade and Travel (page 21)

- The strategy should consider providing guides for activities like camping and using rail trails to help the public understand and manage potential biosecurity risks.

11) Complacency and variable take-up of good biosecurity practices (page 25)

- The strategy should address potential complacency in managing Crown land to ensure consistent and effective biosecurity measures across the state.

12) Collaboration on the big biosecurity challenges (page 27)

- Shouldn't the figures be "greater than 99%" and "less than 70%"?

- 13) Confirm new partnership arrangements that clarify roles and responsibilities (page 32)
- The strategy could address the need for sustained funding for initiatives like the Invasive Plants and Animals Policy Framework (IPPAF), which was not funded beyond 2015, despite its potential to enhance biosecurity through improved coordination and community engagement.
- 14) Work with Traditional Owners to understand and support biosecurity practice on Country (page 32)
- The strategy would be enhanced by including a similar section focusing on working with farmers and Crown land managers.
- 15) Strategic Goal #2: Prevention – Make mitigating biosecurity risk everyone’s business (page 33)
- Crown land management should lead by example in biosecurity practices.
- 16) Priority Actions (page 35)
- 6. Incorporate actions by Crown land management in the toolkit to incentivise good biosecurity practices.
 - 9. Enhance traceability systems' uptake, including those on Crown land, to ensure swift response and sustained market access
- 17) Support champions of good practice (page 38)
- Consider modelling good practice support on the management approach used for Crown land, which constitutes one-third of Victoria.
- 18) Priority Actions (page 39)
- 15. Consideration should also be given to funding allocation, prioritising areas with significant economic impacts and promoting good neighbour practices.
- 19) Identify sustainable funding models (page 41)
- It is crucial to consider the state's role as a significant landholder. There appears to be an imbalance where the state benefits from biosecurity measures but does not proportionately contribute to the associated management costs. This 'free-rider' situation must be addressed to ensure equitable cost-sharing in biosecurity management.
- 20) Promote compliance (page 41)
- Consider incorporating biosecurity obligations into the Land Act.
- 21) Target scientific investment in new tools (page 42)
- Improved Comment: Ensure access to a broad toolkit for biosecurity management and guide when and how to use them. For instance, while tools for managing prickly pear are readily available, permits are required for wheel cactus management.
- 22) Priority Actions (page 42)
- It should include considerations for Crown land management.

23) Commitment by Agriculture Victoria (page 44)

- The commitment should be extended to DEECA to ensure environmental, and Crown land considerations are adequately addressed.

We sincerely appreciate the opportunity to contribute feedback during the consultation for the new Victorian Biosecurity Strategy. Given the significant implications for Victorian farmers, we're eager to continue offering insights as the strategy evolves. Comprehensive information sharing is crucial for an effective biosecurity system, and our previous engagements underscore our deep involvement and interest. VFF is committed to remaining an active voice in this conversation, emphasising the role of advisory committees and relevant groups in shaping the biosecurity framework.

As we near the strategy's November launch, open channels of communication become essential for refining our biosecurity measures. The VFF is dedicated to working alongside the Victorian Government to establish a robust and resilient biosecurity system that safeguards our agriculture and the wider community. For continued engagement, VFF Senior Policy Advisor, Sue Viana, can be reached at policyteam@vff.org.au.

Please do not hesitate to contact us for any further assistance.

Yours sincerely,



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Vice-President
Victorian Farmers Federation