INQUIRY INTO THE ADEQUACY OF AUSTRALIA'S BIOSECURITY MEASURES AND RESPONSE PREPAREDNESS

Submission - Integrity Systems Company (ISC)

Background

ISC is a wholly owned subsidiary of Meat and Livestock Australia (MLA), and was established in 2016 as a result of the SAFEMEAT Initiatives Review (2015). ISC has set out to achieve industry's vision of a single entity delivering an integrated, efficient and effective red meat integrity system.

ISC is responsible for administering and managing the red meat industry's integrity system, which includes the National Livestock Identification System (NLIS) – Australia's system for the identification and traceability of cattle, sheep and goats; the Livestock Production Assurance (LPA) program – the red meat industry's on-farm assurance program that demonstrates best practice livestock management in relation to food safety, animal welfare and biosecurity; and the National Vendor Declaration (NVD) system – the documentation and declarations that accompany livestock when they are sold, or when they move to another location with a different Property Identification Code (PIC).

ISC welcomes the opportunity to provide this submission as key considerations to include in the inquiry into the adequacy of Australia's biosecurity measures and response preparedness.

1. **The adequacy of Australia's biosecurity measures and response preparedness, in particular with respect to foot-and-mouth disease**

Ensuring the national traceability system remains a priority for continuous improvement

The National Livestock Identification System (NLIS) is a national asset that underpins Australia's world leading red meat and livestock traceability system. ISC performs an important role in the traceability system, which is to administer and manage the NLIS database. The NLIS database was developed in 1999 to enable the cattle industry to respond to market requirements. The database has since expanded into sheep, goats and most recently camelids, and there is growing demand for the database to continue to evolve to include all cloven-hoofed foot and mouth disease (FMD) susceptible species. Continual investment and enhancement of the database platform is essential to meet the demands of its users, but to also ensure that it is scalable, secure and has the most sophisticated analytical capability to monitor livestock movements in real time, contribute to surveillance and compliance monitoring, and to underpin effective risk mitigation strategies. These shared requirements exist for the commonwealth, the jurisdictions and industry. A more comprehensive system for planning, developing and co-funding the NLIS should be considered to ensure this key component of the national traceability system remains a priority for continuous improvement, it continues to be fit for purpose for today and is also future ready. Enhancing the NLIS database was a key recommendation within the SAFEMEAT Partners National Biosecurity Committee (NBC) traceability reform process but has not yet been addressed.

Driving strong accountability and delivery of the National Biosecurity Strategy with industry

There is a multitude of biosecurity strategies in place across the commonwealth and each state, with the most recent National Biosecurity Strategy released in August 2022. This strategy represents an imperative to drive greater coordination of efforts to manage biosecurity at a national level. It will be critical to ensure there is strong accountability allocated to the delivery of the strategy, and adequate resources provided accordingly. Key feedback provided by ISC on the draft was the need to instil a greater sense of urgency into the strategy. Concern remains that there is an element of complacency

in the strategy given the protracted nature to develop the implementation plan. As stated in the strategy: "*To guide our longer-term efforts, a national implementation plan will be developed during a 6 to 12 month planning stage. This will outline the governance structure and framework for implementation over the next 10 years*".

A 6-12 month planning stage seems excessive, given that the nature of the issues to be addressed within the strategy are clear. It will also be crucial to ensure industries such as red meat and livestock are adequately represented and involved in the governance structures and implementation planning which has not yet been confirmed.

Ensuring biosecurity infringement penalties are imposed and greater alignment with Commonwealth and State legislation is achieved

With the initiation of the Biosecurity Amendment Bill (2021) there was an opportunity to determine how biosecurity infringements under Commonwealth legislation could also account for traceability infringements which are currently managed under State legislation. Strengthening the penalties under Commonwealth legislation should remain a focus. Too often industry is observing inadequate penalties applied under State traceability legislation, which also impacts on the effectiveness of biosecurity control measures that are in place to mitigate risk. As an example, a Victorian producer seriously compromised the national traceability system by falsely documenting the place of birth of livestock being prepared for export. The producer received a two-year undertaking to be of good behaviour, and also ordered to pay costs of $135.82. This was after a court case that spanned almost 2 years. This complacency in the allocation of penalties aligns completely with the Scott-Orr et al comments around the serious biosecurity breach review on the prawn industry which found "*In practice, the penalties available and applied were often not commensurate with the potential profits to be made or risks that could be caused by the non-compliant behaviour*".

2. **Response to and implementation of previous reports into biosecurity**

SAFEMEAT Partners National Biosecurity Committee (NBC) traceability reform process

ISC has been a key part of the SAFEMEAT Partners National Biosecurity Committee (NBC) traceability reform process since it began in 2018. SAFEMEAT presented its report to NBC in March 2020 which contained five key recommendations to strengthen Australia's livestock traceability system. These include enhancing the governance and administration of the system, mandating individual electronic identification (eID) of all FMD susceptible species, enhancing the NLIS database, equitable and sustainable cost sharing arrangements and relevant regulatory impact analyses. To date, the response to these recommendations has been limited.

However, in July 2022 Agriculture Ministers agreed in principle to develop a national approach to sheep and goat eID and tasked officials to work on an implementation plan in consultation with key stakeholders. ISC welcomes this announcement and the work which has commenced, with jurisdictions and industry working together to codesign key elements of the proposed implementation. Addressing the remaining SAFEMEAT Partners National Biosecurity Committee (NBC) traceability reform recommendations as a matter of urgency would also seem pertinent given, they address the key areas for strengthening Australia's traceability system which is essential for managing all elements of biosecurity.

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