Parliament of Australia

Senate Standing Committee on Rural and Regional Affairs and Transport

Inquiry into Biosecurity and Quarantine Arrangements





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Executive Summary

Plant Health Australia (PHA) welcomes the opportunity to make a submission to the Senate Standing Committee on Rural and Regional Affairs and Transport inquiry into biosecurity and quarantine arrangements.

PHA is the independent national coordinator of the government-industry partnership for plant biosecurity in Australia. In making a submission to this Inquiry two principal objectives are sought, being to secure Committee support for:

- a renewed commitment from the Australian Government to the framework of shared responsibility for biosecurity, in particular the commitment to honour its obligations as partner to plant industries and state and territory governments, and
- implementation of the National Plant Biosecurity Strategy through future Australian Government legislative, policy and investment decisions.

The submission should be read in the context of an earlier PHA <u>submission</u> (April 2008) to the <u>Independent Review of Australia's Quarantine and Biosecurity Arrangements</u> (the Beale Review). Some of PHA's 32 recommendations from that submission were picked up in the Beale Review and have been fully or partially dealt with in the course of the Australian Government's response to date.

In the lead up to the Beale Review, and in the period since, PHA has worked closely with governments and industries to assess the status of the Australian plant biosecurity system and its needs for the future. Account was also taken of the details and implications within the Inter-Governmental Agreement on Biosecurity (IGAB). This culminated in finalisation of the *National Plant Biosecurity Strategy* (NPBS) in December 2010 and its subsequent public release in May 2011. The NPBS has the endorsement of the Australian Government Department of Agriculture Fisheries and Forestry, state and territory primary industry agencies and Australia's major plant industries. Given the extensive consultation involved in its development, its wide-scale support, and direct relevance to this Inquiry, this submission should be read in conjunction with the NPBS.

The NPBS has given Australia something it has never had before — an agreed comprehensive strategy for the national plant biosecurity system. By looking to 2020 it has provided a long-term vision that recognises the inherent difficulties in achieving fundamental change. Realisation of this vision will better protect Australia and Australians from the negative impacts of plant pests, benefit market access for plant products, sustain Australia's high quality and reliable food supply, and preserve environmental health and amenity.

Having regard to the above, the information and recommendations contained in this submission deal primarily, although not exclusively, with the first of the Inquiry's Terms of Reference – (a) *The adequacy of current biosecurity and quarantine arrangements, including resourcing.*

In relation to the second item in the Terms of Reference, it is not possible to provide accurate *projections of demand and resourcing requirements*, although it is PHA's view that acceptance of roles and responsibilities, once defined under the NPBS could have resourcing implications for stakeholders. To some extent these may be offset by improved national coordination and greater efficiency in delivery of outcomes.

PHA has no comment in relation to item (c) – *Progress toward achievement of reform of Australian Quarantine and Inspection service export fees and charges.*

Item (d) refers to progress in implementation of the 'Beale Review' recommendations and their place in meeting projected biosecurity demand and resourcing. Through the National Biosecurity Committee, its various working groups and company Member channels, PHA has been directly involved with efforts to respond to the Beale Review recommendations and action on the priority reform areas mapped out in the IGAB. While it is fair to say that the pace of change has been slower than hoped, important progress has been made. The key, three years on from completion of the Beale Review, is to ensure momentum is not lost and that all government and industry partners move forward with shared vision and commitment.

Recommendations

Recommendation 1

The Australian Government continue to support the framework for shared responsibility for post-border biosecurity and honour its obligations as a partner to plant industries and state and territory governments.

Recommendation 1(a)

The Australian Government progress reforms to the national biosecurity system stemming from the 2008 Beale Review.

• Recommendation 1(b)

The Australian Government continue to support the principles of the Emergency Plant Pest Response Deed and the obligations conferred on it as a signatory.

Recommendation 1(c)

The Australian Government facilitate the ability of industries to use levy mechanisms to participate as partners in the national plant biosecurity system and meet obligations.

Recommendation 1(d)

The Australian Government recognises the relative economic importance of plant industries and contribution to sustaining rural communities when making future decisions on biosecurity resourcing.

Recommendation 2

The Australian Government support implementation of the National Plant Biosecurity Strategy through legislative, policy and investment decisions.

Recommendation 2(a)

The Australian Government facilitate and support adoption of nationally consistent plant biosecurity legislation, regulations and approaches across all jurisdictions.

Recommendation 2(b)

The Australian Government support the establishment of a nationally coordinated surveillance system that provides reliable intelligence, early detection of exotic plant pests, reports evidence of area freedom, enhances pest incursion responses and supports effective management of established pests.

• Recommendation 2(c)

The Australian Government continue to invest in, and support, national efforts to improve Australia's ability to prepare for, and respond to, pest incursions.

Recommendation 2(d)

The Australian Government support expansion of Australia's plant biosecurity training capacity and capability, including a willingness to share trained resources where necessary.

Recommendation 2(e)

The Australian Government support the establishment of a nationally integrated diagnostic network, including the creation of national diagnostic centres based on Australia's climatic zones.

Recommendation 2(f)

The Australian Government support the extension of national agreements for sharing responsibility for eradication of emergency plant pests to management of established pests of national significance.

Recommendation 2(g)

The Australian Government support the establishment and maintenance of an integrated national approach to plant biosecurity education and awareness which engages industry and the wider community, complements the activities of other sectors, and operates along the biosecurity continuum.

Recommendation 2(h)

The Australian Government support establishment of a national framework for plant biosecurity research that maintains essential scientific and technical capacity, is capable of delivering against nationally agreed priorities, and that facilitates collaboration and cooperation across industry sectors.

• Recommendation 2(i)

The Australian Government support and invests in systems and infrastructure for the efficient and effective distribution, communication and application of plant biosecurity information.

Recommendation 2(j)

The Australian Government support independent monitoring of the status and integrity of the national plant biosecurity system and its constructive reporting through PHA.

Recommendation 2 (k)

The Australian Government continue its involvement in provision of Post Entry Quarantine services including investment in new facilities to support high-risk plant post-entry quarantine.

Introduction

Australia has a plant production system, including agriculture and forestry worth \$25 billion annually and a unique environment to protect. This system not only supports the livelihoods and investments of individual producers, it also protects consumers in domestic and export markets, by maintaining the integrity, quality and sustainability of Australia's food supply. More than half of this produce is exported, which indicates the strong reliance Australia's plant production industries have on access to viable international markets. In addition, many rural communities in Australia rely on farming for their viability.

The structure, functioning and status of the national plant biosecurity system is comprehensively reported by PHA on an annual basis in the <u>National Plant Biosecurity</u> <u>Status Report</u>.

The biosecurity system not only protects Australia's plant production industries, but provides benefits to Australia's unique and highly valued natural ecosystems. Pests¹ can have serious impacts on the natural environment and native species through predation, parasitism or direct competition. Similarly, the social value of public amenities, such as parklands and private non-commercial plantings (e.g. fruit trees and gardens), can be reduced through the impacts of pests.

The Economics of Prevention

In many respects Australia's relative freedom from pests makes it the envy of the world. Outbreaks of serious pests occur regularly in other countries with major economic impacts.

It is vital that Australia maintains and enhances its plant biosecurity system. From an economic perspective, pests can have devastating consequences which completely outstrip the costs of prevention. Many of Australia's plant industries rely on exports which in turn rely on the relatively pest-free status of much of our produce.

Economic modelling has revealed the potential costs to Australia of outbreaks and incursions as a result of lost trade, and these too are enormous. Some examples are:

- An incursion of Karnal bunt, a fungal disease of wheat, would cause an immediate loss of export markets valued at \$3 billion a year.
- Ug99 stem rust in wheat would result in losses of \$3.1 billion per year.

Losses are not only theoretical. Significant costs have been, and are currently, incurred by pests. Some examples are:

 The impact and control of weeds in Australia costs agriculture more than \$4 billion a year².

¹ The term pests is used in this document to cover all exotic (not currently present in Australia) insects, mites, snails, nemotodes, pathogens (diseases) and weeds that are injurious to plants, plant products or bees.
² Department of Agriculture, Fisheries and Forestry, Sectoral and Departmental Overview 2010-11

Department of Agriculture, Fisheries and Forestry, Sectoral and Departmental Overview 2010-1. http://www.daff.gov.au/ data/assets/pdf file/0009/1889883/Vol 05 - Sectoral Overview.pdf

- It is estimated that the Australian wheat industry spent between AU\$40 and 90 million between 2003 and 2005 on spraying to control stripe rust³ (Wellings, 2007).
- Introduced insects, such as cattle ticks and aphids, cost agriculture more than \$5 billion per year in production losses and \$1 billion in control costs³.
- The successful Papaya Fruit Fly eradication program that finished in mid-1999 cost \$34 million in total plus an estimated \$100 million in costs to producers⁴
- The ongoing Red Imported Fire Ant eradication program in Queensland has cost almost \$250 million since 2001.⁵
- The recent incursion of Myrtle rust into Australia will undoubtedly have farreaching, and long-lasting implications for agriculture (particularly the nursery industry) and Australia's unique flora and fauna. The economic impacts are yet to be estimated but the impact on environmental health and amenity alone will be significant. Currently the number of confirmed host species for Myrtle rust is more than 50 but given that one-tenth of Australia's plants are in the Myrtaceae family (including gum trees, lillypillies and tea trees) this number is likely to rise substantially.

Efforts to boost Australia's biosecurity system are cost-effective measures by any standards.

At the farm level there are also substantial net benefits from improving biosecurity standards and actively participating in efforts to detect and report pests early. PHA is undertaking cost-benefit work at the moment with the Australian Centre for Biosecurity and Environmental Economics (ACBEE), but it needs to be recognised that producers are already making a significant investment.

There are also indirect effects on the rest of Australia's rural production. Australia's animal industries rely on the availability of plant production, for example, in the provision of fodder for animal farming and pollen for bees. Although most media coverage is given to animal disease outbreaks, it is important to realise that incursions of plant pests have the potential for much greater damage to the economy and rural production. The sustainability of most rural communities in Australia is fundamentally underpinned by viable production.

³ Wellings, C.R. 2007. *Puccinia striiformis* in Australia: a review of the incursion, evolution, and adaptation of stripe rust in the period 1979–2006. *Australian Journal of Agricultural Research*, 58: 567–575.

⁴ Queensland Government Department of Employment, Economic Development and Innovation, http://www2.dpi.qld.gov.au/health/4639.html Accessed June 2011.

⁵ Spring, D, Cacho, O & Jennings, C (2010) The Use of Spread Models to Inform Eradication Programs: Application to Red Imported Fire Ants, Crawford School of Economics and Government, Working Paper 10-3, The Australian National University, Canberra.

Plant Health Australia – Facilitating the National Plant Biosecurity Partnership

The plant biosecurity partnership between government and industry means that responsibilities for maintaining the integrity and performance of the plant biosecurity system are shared. The partnership model recognises that plant producers and the wider Australia community are beneficiaries of better biosecurity outcomes such as improved productivity, product quality, market access, trade profitability, sustainability and environment preservation.

PHA is the national co-ordinator of this partnership and works with its Members to see the partnership strengthened and expanded. Through PHA, current and future needs of the plant biosecurity system can be mutually agreed, issues identified and solutions to problems found. PHA's independent and impartial approach to servicing Member needs allows it to put the interests of the plant biosecurity system first and support a longer-term perspective.

PHA's core activities are funded from annual subscriptions paid by Members. PHA Members include the Australian Government, all state and territory governments and currently, 30 national representative peak plant industry organisations (List of Members at Table 1). A range of special projects are undertaken for individual Members that are separately funded.

Australia has a number of agreements in place that formalise response arrangements to exotic pests. Of greatest importance to plant industries is the <u>Emergency Plant Pest Response Deed</u> (EPPRD), a formal, legally binding agreement between Plant Health Australia (PHA), the Australian Government, all state and territory governments and national plant industry representative body signatories. The EPPRD covers the management and funding of responses to Emergency Plant Pest (EPP) incidents, including the potential for Owner Reimbursement Costs (ORCs) for producers. It also formalises the role plant industries play in decision making as well as their contribution towards the costs related to EPP responses. The Emergency Animal Disease Response Agreement (EADRA) is the equivalent formal agreement for animal industries.

In addition to the EPPRD and the EADRA, the National Environmental Biosecurity Response Agreement (NEBRA) covers responses to nationally significant biosecurity incidents where there are predominantly public benefits or where the incident is not covered under other currently existing arrangements. It was endorsed by the Primary Industries Ministerial Council (PIMC) on 23 April 2010 as the first deliverable under the IGAB.

Table 1: Plant Health Australia's Members

Member type	Member
Government	Australian Government
Government	Australian Capital Territory Government
	New South Wales Government
	Northern Territory Government
	Queensland Government
	South Australian Government
	Tasmanian Government
	Victorian Government
	Western Australian Government
Industry	
Industry	Almond Board of Australia
	Apple and Pear Australia
	Australian Banana Growers' Council
	Australian Dried Fruits Association
	Australian Forest Products Association
	Australian Honey Bee Industry Council
	Australian Lychee Growers' Association
	Australian Macadamia Society
	Australian Mango Industry Association
	Australian Olive Association
	Australian Processing Tomato Research Council
	Australian Table Grape Association
	Australian Walnut Industry Association
	AUSVEG
	Avocados Australia
	CANEGROWERS
	Canned Fruit Industry Council
	Cherry Growers of Australia
	Citrus Australia
	Cotton Australia
	Grain Producers Australia
	Growcom
	Nursery and Garden Industry Australia
	Onions Australia
	Passionfruit Australia Incorporated
	Pistachio Growers Association Incorporated
	Ricegrowers' Association of Australia
	Strawberries Australia
	Summerfruit Australia
	Wine Grape Growers' Australia
Associate	Australasian Plant Pathology Society
Associate	BSES
	Cotton Research and Development Corporation
	Cooperative Research Centre for National Plant Biosecurity
	CSIRO
	Grains Research and Development Corporation Horticulture Australia
	New Rural Industries Australia

Strengthening and Extending Biosecurity Partnerships

Plant biosecurity in Australia operates as a partnership between governments and industry. While the significance of this arrangement is not well understood across the general population it has successfully operated as the foundation for sharing responsibility and has attracted international interest in the period since.

The notion of governments and industries sharing responsibility for biosecurity was a cornerstone of the Nairn Review into Australia's animal and plant quarantine policies and programs in 1996.

Plant Health Australia's formation in 2000 created a mechanism through which the partnership could be forged. Ratification of the Emergency Plant Pest Response Deed (EPPRD) in 2005 saw governments and industries reach agreement to formally share responsibility for decision making and costs in relation to emergency plant pest eradication responses.

The strength of the partnership has grown over time enabling progress to be achieved in improving post-border biosecurity arrangements beyond emergency responses. While the partnership remains strong, it is constantly under tension. Within government, everchanging policy and funding pressures have the potential to erode confidence and hamper progress to the detriment of the partnership.

Findings of the Beale Review and their broad support by the Australian Government in 2008 reinforced the primacy of the framework of shared responsibility and confirmed the significant public good in maintaining a world-class national biosecurity system. PHA supports this view and believes the benefits of the government-industry partnership should continue to be acknowledged.

Recommendation 1

The Australian Government continue to support the framework for shared responsibility for post-border biosecurity and honour its obligations as a partner to plant industries and state and territory governments.

The Beale Review made numerous recommendations concerning the post-border biosecurity setting and the benefits of closer integration along the biosecurity continuum. PHA recognises the importance of the Beale Review as a driver for high-level biosecurity agreements including the Inter-Government Agreement on Biosecurity (IGAB) and the National Environmental Biosecurity Response Agreement (NEBRA), and has played an active role in working groups established by governments to give effect to priority reforms that flow from them. Three years on from completion of the Beale Review it is important now that momentum be maintained. Approval of proposed new national Biosecurity legislation will be an important milestone.

Recommendation 1(a)

The Australian Government progress reforms to the national biosecurity system stemming from the 2008 Beale Review.

The EPPRD has been activated on a number of occasions over the past six years. While post-incident reviews have shown by-in-large that EPPRD administrative requirements have been met, concerns have been expressed by government and industry signatories about the performance of one another in relation to the discharge of obligations. This is a vexed area and one where PHA, as an independent party, is coordinating ongoing improvements to operation of the EPPRD and monitoring compliance to safeguard the integrity of the EPPRD and confidence of signatories. Continued encouragement of larger plant industries to become signatories to the EPPRD will reduce the Australian Government's current liability exposure and reduce some of the pressures in emergency response situations.

Recommendation 1(b)

The Australian Government continue to support the principles of the Emergency Plant Pest Response Deed and the obligations conferred on it as a signatory.

To be able to effectively share responsibility for plant biosecurity in Australia, industries need the means to do so. But achieving these means is difficult. Many industries have established research and development (R&D) levies but these are generally not a suitable stream for application in discharging their responsibilities to the national plant biosecurity system, the EPPRD or the provision of biosecurity and partnership services provided by PHA. The option to establish biosecurity levies (PHA or Emergency Plant Pest Response) exists but there has been slow uptake.

The principle reason for this is the prohibitively high cost involved in meeting the rules set out for establishing and adjusting levies in the Department of Agriculture, Fisheries and Forestry's *Levy Principles and Guidelines*. Unlike R&D levies which generally raise large sums and more than offset the costs of complying with the Levy Principles and Guidelines, biosecurity levies typically raise much smaller amounts.

For example, an industry's PHA levy will typically raise between 1% and 2% of the value of the R&D levy. Levy funds will be used to meet Membership subscriptions with surpluses returned to the R&D stream or investment in legitimate biosecurity activities. In the event that an adjustment is needed, say to meet higher PHA subscription costs, the amounts concerned are generally only a small fraction of the 1% or 2%. For a typical Industry Member adjustments from time to time may be needed to raise fewer than \$1,000. Fulfilling requirements of the Levy Principles and Guidelines may incur costs 30 to 50 times this amount.

PHA believes a solution to this problem would be to enable adjustment of the PHA Levy in balance with the respective R&D Levy so that there would be no net financial impact on levy payers.

In relation to obligations under the EPPRD, industries have the option under the Plant Health Australia (Plant Industries) Funding Act 2002 to establish an EPPR Levy to create a revenue stream to meet their share of costs in the event of an approved eradication response. Other funding mechanisms are acceptable but, given the scale of amounts potentially involved the EPPR Levy is generally the only viable option. If set at a positive rate, funds raised by the EPPR Levy may be used for other legitimate biosecurity activities.

An example is the use of the EPPR Levy by the Australian grains industry to support a national on-farm biosecurity program. Industries that have met the consultation requirements needed to be able to sign the EPPRD have found they are required to undertake further consultation to secure support for establishment of an EPPRD Levy, and another round of consultation and approval, in the event that a positive rate needs to be struck to begin meeting cost shares under an approved eradication response.

PHA believes that a solution would be to enable industries to establish EPPR Levies in conjunction with gaining approval from levy payers to sign on to the EPPRD. Consideration should also be given to allowing industry representative bodies, within agreed limits, to authorise activation of positive rates for EPPR levies in the event of an approved eradication response.

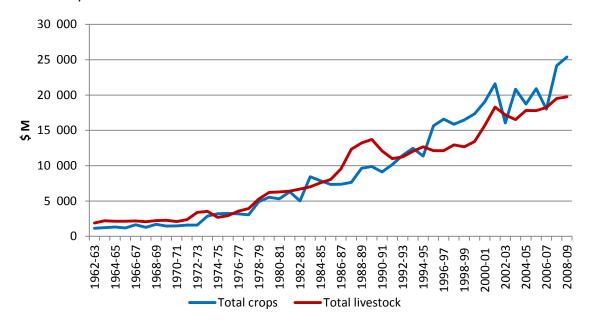
It is understood by PHA that Industry Members have written to the Minister seeking greater flexibility through changes to application of the *Levy Principles and Guidelines* for biosecurity levies. It is also understood that the *Levy Principles and Guidelines* are presently under review.

Recommendation 1(c)

The Australian Government facilitate the ability of industries to use levy mechanisms to participate as partners in the national plant biosecurity system and meet obligations.

Sustainable plant production is not only the lifeblood of Australia's many plant industries but is essential to the viability of Australia's livestock industries and value-added food industries. Hence, while the annual value of commercial plant production has reached more than \$25 billion (and export revenues of close to \$16 billion), consideration needs to be given to the substantial contribution being made beyond these levels to Australia's total agricultural value of production of \$45 billion – see Figure 1. Connected to this is the leveraged contribution plant industries make to the sustainability of rural communities throughout Australia.





Exotic pests, diseases and weeds threaten the sustainability and profitability of plant production and, hence, the fortunes of many other industries as well. The risk of entry, establishment and spread of exotic plant pests is significantly higher than for some other biosecurity threats – evidence for this is clear in the number of investigations and incursions being managed each year. Firstly, there are a very large number of threats. PHA has identified more than 300 high priority pests through the analysis completed for Member industries. Secondly, the ambiguity of symptoms and their expression makes identification and diagnosis difficult. Thirdly, many pests may be spread rapidly by natural means making tracing and control problematic. Lastly, less capacity and capability exists to recognise and respond to pest threats.

While there are generally few serious human health implications with plant pests, the potential economic impact measured in production losses, quality decline, trade disruption and loss of environmental and social amenity can be enormous. A salient example is Myrtle rust which was first detected in NSW in 2010. The pest has now been found up and down the East coast of Australia and because of its pathogenicity and wide host range among native species poses a threat not only to a number of plant industries but to native gardens throughout the community, and to the wider environment, including areas of high conservation and heritage value.

Historically, there has been a disproportionate concentration of resources and policy support for biosecurity in the animal industries. PHA believes that future decision making by all stakeholders, including the Australian Government, should seek to redress this imbalance. Achieving better, more equitable outcomes, will also mean improving capacity and capability to deal with cross-sectoral biosecurity issues, including those relating to pastures, fodder production and weeds of production systems.

Recommendation 1(d)

That the Australian Government recognises the relative economic importance of plant industries and contribution to sustaining rural communities when making future decisions on biosecurity resourcing.

Building a Better Plant Biosecurity System

Questions about the adequacy of current biosecurity and quarantine arrangements and resourcing and projections of demand and resourcing requirements have been addressed in part by the plant sector with the recent release of the National Plant Biosecurity Strategy (NPBS). More than three years in the making, the NPBS was finalised with endorsement of PHA's Members in December 2010 and subsequently released publicly in May 2011 – refer www.planthealthaustralia.com.au/npbs. The NPBS looks at the current state of the national plant biosecurity system, the many challenges that lie ahead, and sets out a range of steps that will need to be taken to overcome these challenges. It stops short of defining roles and responsibilities and in so doing does not deal with resourcing implications. Nevertheless, PHA believes the blueprint it provides for the future of the national plant biosecurity system will be instructive for the Committee in its deliberations.

Development of the NPBS was coordinated by PHA with more than one hundred stakeholders across government and industry lending their expertise to the project. Successive iterations ensured alignment with, and support for, recommendations from the Beale Review and priority biosecurity reforms identified through the IGAB.

The NPBS contains 10 strategies, 17 recommendations and 51 actions. Its central theme is the call over the next ten years for a broadening of partnership arrangements and improved national coordination and cooperation across the plant biosecurity system. In a climate of increasingly constrained funding for biosecurity, real and growing biosecurity threats, and mounting global concerns about food security, working under this new paradigm will be essential.

Securing government and industry agreement to new roles, responsibilities and resourcing models will not be easy. As proposed by the NPBS, PHA has agreed to lead the development of an implementation plan and act in a coordination capacity in seeking action on it in the near future. Work will commence in the 2011/2012 year.

Recommendation 2

The Australian Government support implementation of the National Plant Biosecurity Strategy through legislative, policy and investment decisions.

At the level of individual strategies the following recommendations are also made:

Recommendation 2(a)

The Australian Government facilitate and support adoption of nationally consistent plant biosecurity legislation, regulations and approaches across all jurisdictions.

Recommendation 2(b)

The Australian Government support the establishment of a nationally coordinated surveillance system that provides reliable intelligence, early detection of exotic plant pests, reports evidence of area freedom, enhances pest incursions responses and supports effective management of established pests.

Recommendation 2(c)

The Australian Government continue to invest in, and support, national efforts to improve Australia's ability to prepare for, and respond to, pest incursions.

Recommendation 2(d)

The Australian Government support expansion of Australia's plant biosecurity training capacity and capability, including a willingness to share trained resources where necessary.

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The Australian Government support the establishment of a nationally integrated diagnostic network, including the creation of national diagnostic centres based on Australia's climatic zones.

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The Australian Government support the extension of national agreements for sharing responsibility for eradication of emergency plant pests to management of established pests of national significance.

Recommendation 2(g)

The Australian Government support the establishment and maintenance of an integrated national approach to plant biosecurity education and awareness which engages industry and the wider community, complements the activities of other sectors, and operates along the biosecurity continuum.

Recommendation 2(h)

The Australian Government support establishment of a national framework for plant biosecurity research that maintains essential scientific and technical capacity, is capable of delivering against nationally agreed priorities, and that facilitates collaboration and cooperation across industry sectors.

Recommendation 2(i)

The Australian Government support and invests in systems and infrastructure for the efficient and effective distribution, communication and application of plant biosecurity information.

Recommendation 2(j)

The Australian Government support independent monitoring of the status and integrity of the national plant biosecurity system and its constructive reporting through PHA.

Recommendation 2 (k)

The Australian Government continue its involvement in provision of Post Entry Quarantine services including investment in new facilities to support high-risk plant post-entry quarantine.

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