

8 July 2016

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AFPA Submission: *Independent Review of the Intergovernmental Agreement on Biosecurity*

Summary

The Australian Forest Products Association welcomes the opportunity to provide input into the Independent Review of the Intergovernmental Agreement on Biosecurity (IGAB).

The key issues for the forest industry that should to be considered and addressed by the independent review committee include:

- Biosecurity risk extend beyond commercial native forests and plantations, to forest reserves, urban and peri-urban forests, amenity and urban trees
- Biosecurity, especially as it relates to trees, is a public good, with the risks spread across both the private and public domain, therefore it is an activity that needs to be coordinated and driven by government;
- The arrangements supporting the IGAB have very limited recognition and representation of the forest sector, with the committees and decision-making frameworks under the IGAB dominated by Federal and State government agencies responsible for the agriculture policy.
- The forest industry accepts its responsibility for managing forest health and biosecurity risks on its own land and is prepared to contribute its share of the costs of managing biosecurity risks to protect its assets.
- The forest industry already has significant involvement, and makes a substantial investment, in biosecurity risk mitigation activities, including putting in place the structures to deal with forest biosecurity risks
- The industry is currently in the process of developing a program of activities to implement the priorities identified in the *Framework for National Forest Biosecurity Surveillance*;

AFPA would be keen to discuss issues raised in this submission in more detail and welcomes the opportunity to provide further comment. We look forward to revisions to the IGAB that address the concerns detailed in this submission.

Introduction

The Australian Forest Products Association (AFPA) is the peak national body for Australia's forest, wood and paper products industry. Our membership spans the value chain from forest and plantation owners and managers to major processors of sawn timber, engineered wood products, pulp and paper, as well as timber product, log and woodchip exporters. We represent the industry's interests to governments, the general public and other stakeholders on matters relating to the sustainable development and use of Australia's forest, wood and paper products. Forest industries support around 300,000 direct and indirect jobs nationally with a gross value of sales and services of around \$20 billion.

AFPA's members, as owners and/or managers of large tracts of commercial hardwood and softwood plantations and managed native forest in all States, have a strong interest in quarantine and biosecurity issues across the biosecurity continuum, from pre-border, border and post border, and both exotic and endemic pests and diseases.

The forest industry takes its biosecurity responsibilities seriously and makes a substantial investment in biosecurity in its own right and biosecurity processes. AFPA is an active member of Plant Health Australia (PHA), signatory to the Emergency Plant Pest Response Deed (EPPRD). Forest and plantation owners and managers make significant annual investments in forest health surveillance and management as a routine matter of commercial importance and risk management. This helps early identification of exotic pest incursions which may occur in both the plantation and managed native forest estate.

AFPA notes the high level of detail contained in the discussion paper of Intergovernmental Agreement on Biosecurity (IGAB), and does not consider that we can comment effectively on the detail. Therefore, we have kept our comments at a high level and focused only on the parts of the IGAB that are relevant to forest management and timber product operations.

The IGAB

AFPFA recognises that the IGAB is the starting point, providing the high level objectives of Australia's national biosecurity system, and setting out the role and responsibilities of the parties in managing biosecurity risk.

AFPFA agrees that the objectives of the IGAB, which include reducing risk, effective response, and containment and suppression of existing pests and disease, to minimise harm to the economy, environment and community, are appropriate and provide a sound base for Australia's biosecurity system.

It is noted that the IGAB is an agreement between governments (Federal and States/Territories), identifying the role of the different levels of government in managing biosecurity risks. The arrangements supporting the IGAB typically involve Federal and State/Territory Government representatives. Ultimately managing biosecurity risk is a public good and an activity that needs to be coordinated and driven by government.

The IGAB Review discussion paper places a heavy emphasis on shared responsibility, with industry, natural resource managers, and other parts of the community having a role to play. The forest industry accepts their responsibility for managing forest health and biosecurity risks on its own land and is prepared to contribute its share of the costs of managing biosecurity risks to protect its assets. However, it is important to recognise that biosecurity, especially as it relates to trees, is mainly a public good, with the risks spread across both the private and public domain. Therefore, it remains appropriate that governments are responsible and should continue to carry most of the costs associated with managing biosecurity risk.

The forest industry has concerns that the arrangements supporting the IGAB have very limited recognition and representation of the forest sector. Within the structure of many state governments, the agencies responsible for policy and regulation of the forest sector are not the same as the agency responsible for agriculture, with forest health and biosecurity often not under the control of the state's Chief Plant Protection Officer in many states. As a result the committees and decision-making frameworks under the IGAB (which mainly involve a Federal Department of Agriculture representative and state Chief Plant Protection Officers or their

representatives) have very limited expertise and are less likely to be aware of evolving issues related to forest health and biosecurity. This should be addressed in the review of the IGAB, with forest health and biosecurity expertise embedded in the IGAB and its supporting arrangements.

Agreeing to risks, priorities and objectives

It is important to appreciate that forest health and biosecurity risks and management are unique and can be quite different from that for agriculture, as it takes in very broad, long-lived and often complex biological systems, including plantations of exotic and native species, native forests, urban and peri-urban forests (often recreation reserves), amenity and urban trees, as well as timber-in-service. This compares to other agricultural sectors which are often only focused on one, or a small number of, short-lived plant species, that are typically only on private land. Therefore, it needs to be recognised that the management of, and responsibility for, forest health and biosecurity issues differ from the agricultural sector.

Further, the majority of the commercial forest and plantation estates in Australia are located a long way from the major risk points of entry (i.e. ports) and there are a large number of potential host trees (planted in domestic gardens, the urban landscape, parks and conservation reserves), which are more likely to be infested by exotic pests and diseases long before there is an infestation of a commercial forest or timber plantation. It is highly likely that if a pest is found in a commercial forest plantation, it will already be widespread in the urban and peri-urban landscape, therefore very difficult to eradicate.

AFPA notes the need to define the biosecurity continuum, especially the distinction between 'border' and 'post-border' measures, and the role of Federal and State governments within this continuum. Previously AFPA has raised concerns that this distinction, and the resulting division of responsibilities between Federal, State Governments and industry, may have resulted in suboptimal outcomes with respect to the surveillance, monitoring and management of areas immediately adjoining ports. This represents a major risk with respect to the establishment or control of exotic forest and timber pests.

AFPFA has been encouraged by the increased investment in pest trapping programs at ports in Australia. However, there are ongoing concern that, partly as a result of the large number of organisations with an interest in this surveillance work, there has not been sufficient information made available to the relevant organisation on research, developments or findings concerning intercepted pest and diseases, new trapping methodologies, location of trapping systems etc. Supporting documentation should be made to enable this important information flows between stakeholders in the biosecurity continuum.

Australia's forest industries are at high risk of indirect pest incursions. Due to the rapid growth and changing patterns in international trade, there is increasing risk from exotic pests and diseases that can be accidentally introduced by passengers, imported commodities, packaging material and transport vessels (such as cargo containers).

AFPFA is concerned that, with respect to forest pests, the Australian quarantine arrangements are too focused on imported goods/commodities (primarily sawntimber etc.) and not sufficiently focused on packing materials (which are often made of low grade wood and more vulnerable to pests and diseases) and cargo containers. These potentially represent a much higher risk. Packing materials and cargo containers are of significant concern because of their widespread and unknown movement both within Australia and in other countries.

There have been a number of significant plant pest incursions in recent years including European House Borer, Myrtle Rust, Japanese Pine Sawyer Beetle, Pine Wilt Nematode and Giant Pine Scale. While the origins of Myrtle Rust and Giant Pine Scale are unknown, of greater concern is the occurrence of European House Borer, Japanese Pine Sawyer Beetle and Pine Wilt Nematode, which can be traced back to low grade wood imported as packaging material.

The movement of imported packaging timber represents a significant risk to Australia's forest and plantation estate, and wood products in use. Australian companies have invested significant funds in meeting phytosanitary requirements for exports, but it is not clear that other countries exporting to Australia are meeting the same standard.

Embedding shared responsibility

AFPA notes that shared responsibility is a key theme of the IGAB Review discussion paper and would like it recognised that the forest industry already has a significant involvement in biosecurity.

AFPA, as the representative of the forest industry, is a member of Plant Health Australia (PHA) and signatory to the Emergency Plant Pest Response Deed (EPPRD). The forest industry has worked with forest health experts and PHA to put in place the structures to deal with biosecurity risk in plantation resources, through the development of the *Plantation Forest Biosecurity Plan* (2013) and the *Biosecurity Manual for the Plantation Timber Industry* (2015), as well as going through the process to identify high priority pests for the sector.

In addition, the forest industry has been (and will continue to be) an active participant in a number of working groups and other meetings run by the Department of Agriculture and Water Resources, as well as contributing to public consultation on biosecurity legislation, and other biosecurity issues.

Until very recently, the forest sector had an active role in the decision-making process on biosecurity issues that affect the forest sector through representation on Plant Health Committee (PHC) and its subcommittees. However, a recent decision by the Commonwealth to remove the forest sector observer position from PHC and disband the Subcommittee on National Forest Health (SNFH), has left the forest sector without a voice in this decision-making process on plant biosecurity.

The forest sector has responded to these changes by setting up an industry working group, the Forest Health and Biosecurity Subcommittee of the AFPA Resource Chamber. While this acts to advise industry on biosecurity matters, it does not replace industry's position at the table in the decision-making process of PHC.

If government is serious about embedding shared responsibility and increasing the role of industry, natural resource managers, and other parts of the community in the decision making process, it should recognise the unique characteristics of forest sector and ensure PHC has the expertise to deal with forest health and biosecurity issues. This should include restoring the forest sector observer position on PHC.

Funding biosecurity

The forest industry has shown from past efforts that it is willing to play its role and contribute its share of funding for biosecurity activities. Plantation owners regularly and consistently undertake forest health audits of their plantations. Some plantation owners contribute to and participate in surveillance efforts around ports. Softwood plantation owners agreed to contribute their share of the eradication costs following the recent EPP incursion of Giant Pine Scale, and have in place a levy arrangement to ensure these costs are spread evenly across the industry.

In attributing the costs to responsible parties for forest health and biosecurity management activities, it is important to take into consideration the public good aspects of both managed native forests and common plantation species. The plant species present in managed native forest and plantations are common across the landscape and across land tenures in natural forests and urban environments. Therefore, there is a significant public good aspect to the biosecurity risks, and responsibilities are not exclusive to our industry.

While the forest industry has shown it is prepared to take on its responsibility associated with managing biosecurity risks and accept its share of costs, this doesn't appear to extend to the risk-creators. Particularly in the case of surveillance and monitoring, importers of at-risk products must also be required to take responsibility for and carry a share of the costs. As set out in the IGAB (Principle iv - a), risk creators and beneficiaries should contribute to the cost of risk management measures in proportion to the risks created and/or benefits.

Market access

There is a significant amount of intra and interstate trade in logs, woodchips, wood and paper products forming complicated and interrelated pathways for the potential transfer of pests, diseases and biosecurity risks. As a result, the interaction of governments, market access and biosecurity issues are of importance for the forest industry. AFPA and our members have a keen interest in ensuring an efficient and effective framework for the regulation of biosecurity and forest products trade.

It is important to preserve our trade reputation as a low biosecurity risk country. This has been highlighted by the Giant Pine Scale incursion in Victoria and South Australia. The recent decision by the main combat state, Victoria, that they believe it is no longer technically feasible to eradicate GPS has left industry concerned about the likely response in our major log export markets. While Giant Pine Scale is currently not a declared pest in any of our major pine log export markets, which include China, Japan and South Korea, these markets are sensitive to biosecurity risks. It is feared that if GPS cannot be eradicated, it may impact on the ability of Australian companies to trade forest products, particularly in China, which already places significant phytosanitary requirements on the import of forest products from Australia.

The role of research and innovation

The forest industry with support of forest health experts have recently produced a *Framework for National Biosecurity Surveillance of Exotic Forest Pests* which identifies priorities for biosecurity activities and research. Priority areas for funding include:

- analysis of the costs and benefits of funding biosecurity
- pathways and pest risk analyses
- high risk site surveillance
- a national biosecurity coordinator, and
- training for industry.

The industry is in the process of developing a program of activities to implement the priorities set out in the *Framework for National Biosecurity Surveillance of Exotic Forest Pests* and identify funding options.

Postscript

Thank you for the opportunity to provide comments to the Independent Review of the Intergovernmental Agreement on Biosecurity. AFPFA is available to discuss the issues raised in this submission in more detail and welcomes additional opportunities to provide further comment.