

National Biosecurity Committee
National Biosecurity Strategy Reference Group

17 March 2022

Consultation Draft: National Biosecurity Strategy

Released February 2022

Vinehealth Australia (Vinehealth) is pleased to put forward this submission in response to the draft consultation document titled 'National Biosecurity Strategy' (draft NBS) released in February 2022.

Vinehealth Australia

Vinehealth is an independent statutory authority and obtains its powers and functions from the *Phylloxera and Grape Industry Act 1995*. The purpose of this Act is to protect South Australian vineyards from pests, diseases and any other condition that may affect vine health, by investing in biosecurity training and awareness, policy and procedures, research and development priority setting, and preparedness, prevention and response activities, to the benefit of the South Australian and national wine industry.

Vinehealth has provided over 120 years of continuous focus on vine biosecurity; beginning long before the emergence of modern biosecurity structures and frameworks in place today, and still represents a model for the way government and industry can collaborate successfully on biosecurity.

Vinehealth's stability through industry funding and leadership, its proud history and 'ownership' by industry ensures that it will continue to provide an important focus on vine health, biosecurity and awareness of threats to the Australian wine industry, which contributes \$40.2 billion in gross output to the Australian economy.

It is with this history, expertise and insight that Vinehealth puts forward the following comments with respect to the draft NBS.

Feedback

1. Vinehealth commends the National Biosecurity Committee (NBC) for the development of a draft NBS and the industry consultation process.
2. The relatively short time allowed for review, consideration, and feedback is noted.
3. The draft NBS clearly sets out a case for enhanced action to meet an evolving biosecurity landscape.
4. Vinehealth broadly agrees with the vision, purpose and priority areas. However, caution is advised around the wording of the vision '...Australia's way of life' – who defines this? is it our current way of life? is it how each individual wants to live their life? is it the government's view of what is acceptable?
5. Suggest that a definition of an established exotic pest be included in the NBS, does this include regulated endemic pests such as fruit fly and phylloxera?

6. Much of the intent and language in the draft NBS is similar to that used in other biosecurity plans, strategies, statements etc. that have been created over recent times to guide different components or parts of the biosecurity system. Whilst it is agreed one strategy and vision brings strength and purpose, Vinehealth strongly encourages the NBC to better measure and report on the performance of the national biosecurity system, and to make this readily available across government and industry.
7. The actions listed for each priority area are very general in nature. It is acknowledged that for such an overarching strategy document that actions will be more generic to allow flexibility to meet a changing landscape. It therefore highlights that the value of the NBS will be dependent on detailed action and implementation plans and regular performance tracking.
8. Some specific comments on priority areas:
 - Shared biosecurity culture
 - Suggest a key action will be to understand who the priority is to build a culture of biosecurity action → where is the most value realised, is it industry, the community or other stakeholders? No doubt it is combination of all, but all too often limited resources are spread across too many insignificant projects that do not drive change. And consideration for the drivers that make people embrace a culture of biosecurity action is paramount. What drives a government employee in biosecurity to perform their role will be vastly different to a grower / producer / winemaker.
 - Stronger partnerships
 - Is an enabler to all work undertaken across the biosecurity spectrum.
 - Caution that at many biosecurity forums, plans, strategies etc. the ongoing action of reviewing and refining roles and responsibilities of stakeholders and system participants is raised. This should just be inherent and embedded in the biosecurity system.
 - Vinehealth suggests that it may be timely for an independent review of the current committee structure that governs biosecurity across Australia, to assess their operations and effectiveness. For example, the Plant Health Committee and its sub-committees. Does the current structure work? can improvements be made to deliver better biosecurity outcomes for industry, community and the environment?
 - Highly skilled workforce
 - A foundational enabler for the entire biosecurity system, the capacity and capability of people in our biosecurity system has long been discussed at various forums, and strong action in this area is urgently needed.
 - This priority mentions ‘...our people...’ → suggest greater definition as to who this is referring to.
 - Strong performance metrics are needed to guide this priority and deliver short- and longer-term progress.
 - Coordinated preparedness and response
 - This priority area is really the operational crux of biosecurity, in that the other five priority areas are key enablers / foundational elements of a biosecurity system that will allow biosecurity preparedness, prevention, response and recovery activities to be executed with precision, efficiency and impact. Given this, suggest that the wording could be somewhat strengthened.
 - As such, Vinehealth endorses the need for actions to be across preparedness, response, and recovery activities, and should include diagnostic capabilities.
 - Sustainable funding
 - It is agreed that biosecurity needs long-term sustainable funding to meet the evolving landscape.
 - In doing this, the value of current sector specific approaches must be valued.

- Government has long promoted the need for ‘shared responsibility’ between government and industry with respect to biosecurity. The continuous operation of Vinehealth Australia for over 120 years, funded solely by grape growers and winemakers and with a sharp focus on biosecurity, is testament to the South Australian grape and wine industry’s commitment to biosecurity.
 - In all discussions regarding funding, the value proposition must be evident, and confidence provided around the governance structures that oversee the use of funds.
 - Support the assessment of risk creators and system beneficiaries → Vinehealth has recently undertaken such an assessment as part of a review of our funding mechanism.
 - Integration supported by technology, research and data
 - Vinehealth fully endorses this priority area.
 - However, the integration of technology must be done in a considered manner to manage risks, and also from a user’s viewpoint. Often there is an expectation by government that users will freely contribute to such a system but fails to recognise hesitancy based on privacy and governance concerns. It must also recognise that currently a large proportion of growers in the grape and wine industry are not tech savvy, if we are requiring them to feed information into a broader system.
 - With the presence of many agtech startups, we have witnessed substantial investment by industry in products/services of these companies, that initially seem to deliver a product/service, however, soon sell out with the product failing to meet ongoing needs. Additionally, industry and government need to work together to determine the foundational data for our industry, importantly the architecture and required functionality. With this understanding, collaborative efforts with tech providers can then co-develop tech solutions.
 - To this end, the current Australian AgriFood Data Exchange project, which incorporates a biosecurity use case, is an example of how we need to innovate with the use of tech to assist biosecurity outcomes, all the while being mindful of privacy and governance considerations.
 - Suggest that the NBC carefully consider getting the right mix of experts to assist in developing actions for this area → experts that have tech knowledge in agriculture and broader supply chains but are not pushing a solution up front.
 - It is also noted that investment in sector specific interoperable digital solutions is critical, rather than stagnation due to visions of one IT system that drives the whole biosecurity landscape. An agile tech interoperable digital ecosystem for biosecurity is paramount. This opportunity must be realised. A pertinent example is of [Vinehealth’s Digital Biosecurity Platform](#).
9. The intent noted in the consultation draft to further consult with stakeholders to develop action plans is strongly encouraged.
- However, all too often such action plans are developed through consultation, but then lack strong governance over their implementation, accountability, and transparency back to stakeholders on actual achievement against key performance indicators.
- To ensure strong engagement by system participants in the co-development of these action plans, NBC needs to demonstrate commitment and funding to properly resource the implementation of the NBS.
10. Vinehealth would be delighted to participate in developing action and implementation plans for the NBS, to ensure that it meets the needs of the grape and wine industry, and more broadly the agriculture sector, community and environment. Participation through workshops, forums or the like would work best, with a very structured agenda.
11. It is suggested that the NBC report on delivery of action and implementation plans to government and industry at least annually. Measurement and tracking against key performance indicators is key – with transparency as to data behind achievement, or not, of performance indicators.



Vinehealth welcomes and strongly supports the draft NBS, but encourages deep involvement by industry in the co-development of actions, and regular reporting back to participants to track progress. Without measurement of the system we won't be able to improve it or engage the right people to create an impact.

Please do not hesitate to contact me on 0418 818 543 or inca@vinehealth.com.au for further information regarding Vinehealth's feedback.

Regards,

A handwritten signature in black ink, appearing to be the initials "IL" followed by a long horizontal stroke.

Inca Lee
CEO