



VINEHEALTH
AUSTRALIA

Submission to Primary Industries and Regions SA

**For consultation – Draft Directions Paper
New legislation for South Australia’s biosecurity**

November 2019

Table of contents

Vinehealth Australia’s position	3
Background and context	5
Vinehealth Australia	5
Unique ways of working that drive Vinehealth’s operations.....	7
A challenging operating environment.....	8
The South Australian wine industry – a powerhouse.....	9
Value proposition and impact.....	10
Safeguarding and advancing biosecurity management for the grape and wine industries	11
Capability and capacity of Vinehealth that must be preserved	11
The risk.....	12
Responses to PIRSA’s Draft Directions Paper	13
Overarching comments	13
1. A single piece of framework legislation.....	13
2. Proposed goals and objects of the new Biosecurity Act.....	14
3. Current Acts proposed to be incorporated into the new Biosecurity Act	14
4. Proposed key definitions of the new Biosecurity Act	15
5. Proposed core concepts of the new Biosecurity Act.....	15
6. Key principles of the new Biosecurity Act	16
7. Specific matters to be considered in the development of the new Biosecurity Act	20
Contact	21

Vinehealth Australia's position

Vinehealth Australia (Vinehealth) is pleased to lodge this submission to Primary Industries and Regions SA (PIRSA) in response to the Draft Directions Paper distributed for stakeholder consultation on a 'New Legislation for South Australia's Biosecurity'. Vinehealth also acknowledges it received supplementary information from PIRSA in relation to queries initially raised regarding the Draft Directions Paper and impact on the *Phylloxera and Grape Industry Act 1995* (PGI Act).

The unrelenting advance of phylloxera through Europe and its arrival in Geelong Victoria in 1877 prompted South Australian wine industry leaders in the late 1800s to persuade the State government to establish legislation to protect South Australian vineyards. The *Phylloxera Act 1899* was enacted in 1899 and remains today as the PGI Act. This 120-year dedication to biosecurity is an extraordinary demonstration of industry accountability and action, long before the contemporary concept of 'shared responsibility' was introduced into the biosecurity vernacular. This dedication was recognised nationally in 2017, with Vinehealth being awarded an Australian Biosecurity Industry Award, presented by the Department of Agriculture and Water Resources.

Vinehealth commends the South Australian Government for undertaking the development of a new Biosecurity Act to strengthen our biosecurity system to ensure that it can respond to current and future biosecurity challenges.

Further to recent discussions with PIRSA, it is also recognised that no decision has been made as to whether the PGI Act should be within scope of the new Biosecurity Act.

This submission provides:

- information to give context to (1) the current structure and function of Vinehealth, and (2) the feedback provided to the Draft Directions Paper, and
- feedback on the Draft Directions Paper which Vinehealth trusts will assist PIRSA refine the final document for broader consultation.

Deep consideration of the Draft Directions Paper has led to the development of a clear position regarding biosecurity management to ensure the prosperity of the grape and wine industries in South Australia.

Our position is:

1. Vinehealth welcomes and strongly endorses the government's intent to strengthen South Australia's biosecurity system, through the development of a new Biosecurity Act.
2. Vinehealth supports the development of a new Biosecurity Act, incorporating the *Plant Health Act 2009*, *Livestock Act 1997* and *Impounding Act 1920*. Vinehealth offers no opinion on the inclusion of the *Dog Fence Act 1946*, or parts of the *Natural Resources Management Act 2004* and *Fisheries Management Act 2007*, due to insufficient knowledge of these Acts and the impact of inclusion or exclusion.
3. Vinehealth sees no compelling justification for the PGI Act to be incorporated into a new Biosecurity Act. As such, the inevitable conclusion is that the PGI Act should not be consolidated into a new Biosecurity Act.
4. The current PGI Act, including the levy and information collection system, provides the basis for strong biosecurity action. This system has widespread support from industry and has demonstrably resulted in arrangements for grapevine biosecurity and industry capability which are the envy of most other plant industries. Funding derived through the PGI Act enables sector specific grapevine biosecurity action.
5. Vinehealth recognises that clarity and consistency offered by lead powers in a new Biosecurity Act, without inclusion of the PGI Act, has the potential to improve grapevine biosecurity by strengthening PIRSA's capacity to act in an efficient, cohesive and integrated manner.
6. Vinehealth sees inherent risk associated with incorporating the PGI Act into a new Biosecurity Act, primarily through loss of industry leadership, support and engagement in grapevine

biosecurity, which would lead to poorer biosecurity (prevention, preparedness and response) for South Australian vines.

7. Vinehealth acknowledges that with the development of a new Biosecurity Act, it is timely to concurrently review the provisions of the PGI Act to ensure it is 'fit for purpose' and complementary to the new Biosecurity Act, to safeguard industry sharing responsibility for biosecurity.
8. Vinehealth understands that a reference stakeholder/advisory group has been formed and has already met to discuss the proposed new Biosecurity Act. Vinehealth requests that it be included in future meetings of this group.
9. Vinehealth requests that PIRSA provide the revised Directions Paper for review prior to broader industry and public consultation in early 2020. This is important given that industry will value and rely on Vinehealth's position in relation to the Directions Paper.

Background and context

Vinehealth offers the following information as context to the current structure and function of the organisation, and to its responses to the Draft Directions Paper.

Vinehealth Australia

Our history

The story started in Europe in the 1800s. Phylloxera was introduced into France on American vine cuttings and reported in 1865. Its presence was quickly felt. As a measure of the devastation phylloxera caused in France alone, it's been reported that 2 million acres (810,000 hectares) of vines were destroyed by phylloxera between 1868 and 1888. And 400 million sterling in lost revenue was calculated in France between 1868 and 1884, directly due to phylloxera (*Sydney Morning Herald*, 1890).

Many believe at least two-thirds of all European vineyards were destroyed, and some think the number is closer to 90%. European wine production plummeted around 75% overall, between 1875 and 1889.

In the face of the growing international phylloxera threat, the South Australian wine industry persuaded the State government to establish the *Vines Protection Act 1874*, prohibiting importation of vine material into the state.

The unrelenting advance of phylloxera through Europe was watched nervously by the Australian wine industry. Then in 1877, phylloxera was confirmed in vineyards in Geelong, Victoria, having been reported undiagnosed two years prior.

Prevention efforts intensified in South Australia. The *Phylloxera Act 1899* established The Board – now Vinehealth Australia. That first phylloxera board included some famous wine industry names: Thomas Hardy, George Fullerton Cleland, Henry Maydwell Martin, William Patrick Auld, Herman Büring, Benno Seppelt, Maurice William Holtze and Arthur James Perkins.

The *Phylloxera Act 1899* was a progressive piece of legislation which:

- Made provision for registration of all South Australian vineyards;
- Imposed a quarantine area of approximately two chains (approximately 40m) beyond any vines where phylloxera was found or suspected to be;
- Set levies for grapegrowers, winemakers and distillers;
- Compensated growers financially for plantings removed in eradication programs;
- Named six districts with one grower from each appointed to the Board plus two;
- Prohibited replanting to vines for 10 years on phylloxerated land except with the sanction of the Board; and
- Described a vine as living or dead.

“Funded by the grapegrowers of South Australia, a major role of the board has been to broaden the awareness of the devastation which could be caused by the uneducated or careless if phylloxera were introduced, as has happened in many of the leading grapegrowing countries around the world. A constant program of research and education taken across state boundaries has been significant in keeping phylloxera out of the vineyards of South Australia,” wrote Bill Brand, former Chairperson of The Phylloxera and Grape Industry Board of South Australia (Vinehealth Australia), in *'The Phylloxera Fight (1996)'*.

Some people say the absence of phylloxera in South Australia is down to luck. But few argue about the role Vinehealth Australia has played in helping to keep phylloxera and other grapevine pests out of the State.

The modern Vinehealth plays a much bigger role than the original phylloxera board of 1899.

Governing legislation

The *Phylloxera and Grape Industry Act 1995* (PGI Act) is the current governing Act of Vinehealth, with the purpose to provide for the protection of vineyards from disease and to assist and support the grape industry in South Australia. Since 1995, only minor administrative amendments to the Act have occurred.

While prevention of phylloxera remains a core focus, Vinehealth's remit is for the prevention and management of all exotic and significant endemic pests, diseases and weeds and any condition that could impact the health of vines. As such, the broad definition of 'disease' in Vinehealth's governing Act is:

- a. any bacterium, fungus, insect, mite or other arthropod, protozoan, virus or other organism or pathogen; or
- b. any other condition, that may affect vines (including dried and table grape vines).

The PGI Act is unique to South Australia, with no equivalent legislation in other states or territories. This should be view as a distinct advantage.

Categorisation and governance structure

Vinehealth is a statutory authority and an instrumentality of the Crown. It fulfils a public purpose of protecting the State's vineyards from disease. This is the case even though the direct beneficiaries of our work are those who own, operate and work in the industries that rely on vineyard produce. When the number of people who rely on wine businesses less directly (including those who work in areas reliant on wine industry tourism) are considered, as well as the public interest in having productive local vineyards and the benefits to the wider community through taxes and so on, Vinehealth's purpose can, therefore, be considered a public one.

Vinehealth maintains a degree of independence from central government, not being subject to ministerial control in a general sense and is not an agency of the Crown under general law. There is no provision in the PGI Act that expressly states that Vinehealth is subject to ministerial control and direction. The fact that the Minister can direct Vinehealth to perform tasks under section 13(1)(j) of the PGI Act, does not mean that the Minister can direct Vinehealth on how to carry out those tasks.

A board, constituted by the Chief Inspector for South Australia, an expert in viticultural research, and up to seven persons selected by a Board Nominations Committee made up of industry stakeholders, maintains oversight over the organisation's strategy, finances and operations. This skills-based board functions according to contemporary board governance principles, with accountability to industry and the Minister.

Funded by industry

The PGI Act enables contributions to be collected from (a) a 'registered person' (owner of land upon which vines are planted), (b) winemaker, and (c) distiller, in accordance with rules *approved* by the Minister. Since the enactment of the original *Phylloxera Act 1899*, vineyard owners, winemakers and distillers have made contributions to fund the operation of Vinehealth. This original Act outlined annual rates per acre of three pence on all vineyards exceeding one acre when they had attained the age of two years, of six pence on vineyards planted for four but less than eight years, and of one schilling on vineyards eight years or older. In addition, every winemaker and distiller paid six pence for every ton of grapes annually purchased.

In the current PGI Act, the approved rules are for a contribution of \$9.50 per hectare (\$50 minimum) to be collected from registered persons. This equates to approximately \$740,000 per annum – a quantum that has seen little change over the last decade given stable planted vineyard area of around 75,000 hectares. These contributions are Vinehealth's predominant income stream to perform its primary functions. Small amounts of supplementary income from occasional grant funding programs, are intermittently received.

The stability of industry's commitment to funding for biosecurity for 120+ years, is an extraordinary demonstration of industry accountability, action, and dedicated 'sharing of responsibility' – notably, decades in advance of this contemporary biosecurity vernacular. Any

diminishing of or threats to this sustained commitment is at odds with current government calls for shared industry accountability and investment in biosecurity.

An ambitious strategic plan to deliver functions

Vinehealth's aspiration as detailed in its *Strategic Plan: Towards 2020*, is that biosecurity is a top priority in the grape and wine industries. By driving biosecurity for the grape and wine industries, Vinehealth aims to protect assets from biosecurity risk and impact. Such a sector specific approach to biosecurity is a distinct advantage. Achievement of the four goals in this strategy will see the biosecurity dynamic shift from 'insurance' against risk, to an enabler for success.

Through Vinehealth, South Australian vineyard owners invest in biosecurity training and awareness, policy and procedures, research and development priority setting, and preparedness, prevention and response activities, to the benefit of the state and national wine industry.

As detailed in the PGI Act, Vinehealth is responsible for:

- Delivering 10 primary functions focussed on investment in identifying and assessing biosecurity risks, biosecurity training and awareness, developing policies and procedures to mitigate risks, endorsement of schemes to ensure high health propagation material, research and development priority setting, and preparedness, prevention and response activities;
- Assisting and supporting the grape industry in its initiatives;
- Maintaining a Register of registered persons who own 0.5 hectares or more of planted vines, including owner details, land parcel information, planting details, imagery and any other information that the organisation deems appropriate to delivering its functions;
- Managing a system to levy, collect and recover contributions owing to Vinehealth, pursuant to section 23 of the PGI Act;
- Being inspectors under the *Plant Health Act 2009* ex officio;
- Determining the appropriate control action to take in the event of an outbreak and providing ongoing advice to the Minister regarding the outbreak; and
- Developing a five-year strategy, ensuring communication networks with regions and industry and provision of annual reporting to the Minister.

Vinehealth's primary functions assist the grape and wine industries to prevent and manage pests and diseases that would have significant economic and social impacts across the supply chain. A prosperous wine industry supports many other sectors, including tourism and regional communities.

Unique ways of working that drive Vinehealth's operations

The two primary stakeholders for Vinehealth are:

1. The grape and wine industries. This encompasses the entire grape and wine supply chain and the national, state and regional bodies that represent and support the industry; and
2. Government.

In addition, it is acknowledged that an important stakeholder for Vinehealth are the regional communities who's economic and social welfare would be impacted in the event of a significant pest or disease incursion.

A recognised strength of Vinehealth is its connection and engagement with industry. The focus on and importance of this connection is paramount to fulfilling the functions of the PGI Act, given that success for many of our functions is dependent on our ability to empower industry to act to protect their assets from a biosecurity shock. This connection is underpinned by:

- Industry involvement in the selection of board members;
- Board members with sector experience and respected skills;

- Board governance;
- Management staff/executives with industry experience, knowledge and networks;
- An annual operating plan that delivers a portfolio of activities across the biosecurity continuum of preparedness, prevention, incursion management, asset-based protection and recovery;
- Capability and authority to serve as a trusted expert conduit for industry on biosecurity matters with government;
- Our collective and specific knowledge of industry and government;
- Proven ability to translate policy, legislation and standards into practical tools and information that can be readily adopted and integrated into best practices by industry;
- The maintenance of a Register for vineyards greater than 0.5 hectares and our interaction with vineyard owners to ensure accuracy of information;
- The accountability to industry through directly managing the levy system, including collection and recovery of contributions payable. Vinehealth personally sends a Notice of Assessment on its own letterhead, outlining contributions payable to each registered person. This action provides a direct link for levy payers to reflect on the value of the services that Vinehealth delivers for the contribution they pay. This contrasts with other levy collection systems for the wine industry¹; and
- Ongoing investment in strategic and tactical communication that enables regular touch points with industry and stakeholders.

Such a connection with industry would not exist if Vinehealth were integrated into government and seen as a government department or agency.

The enduring and strong working relationship that Vinehealth has with the South Australia government, and particularly Primary Industries and Regions SA (PIRSA), has enabled strategic and operational biosecurity issues for industry to be discussed and, in many cases, addressed. This relationship has continued to evolve with changes in the respective organisations and key personnel. PIRSA continues to rely on Vinehealth for counsel, operational activities and consultation with industry on various matters.

Vinehealth is viewed as an honest broker between government and industry on biosecurity matters and is in the enviable position of being everyone's informed advocate.

A challenging operating environment

It is acknowledged that the global biosecurity landscape is increasingly complex and rapidly changing. This demands frameworks, systems and processes that are multi-dimensional and agile to respond to the type and scale of biosecurity threats that Australia and the grape and wine industries face. While skyrocketing global trade and tourism, agricultural expansion and intensification, urbanisation and climate change are recognised as increasing our exposure to biosecurity risks, so too are changing government priorities with respect to biosecurity investment and policy.

A stark reality is painted in the recently published report titled *Pest and disease interceptions and incursions in Australia*² by the Australian Government's Inspector-General of Biosecurity. It details a 46% increase in pest and disease interceptions at the Australian border between 2012 and 2017 (of which 0.6% were high priority plant pests) and the work needed to strengthen the government's ability to intercept pests and diseases, and to communicate the approach and leakage rates to key stakeholders to enable improved post border surveillance.

Additionally, detections of phylloxera continue in Victoria, both within the existing Maroondah Phylloxera Infested Zone and in neighbouring Phylloxera Risk Zones. The likelihood of phylloxera

¹ For the *Primary Industries Funding Schemes Act (SA) 1998* which funds one South Australian state and six regional wine associations (with the exception of the South Australian Wine Industry Association and regional associations in the Limestone Coast), and the *Primary Industries Levies and Charges Collection Act 1991* which funds Wine Australia, levies are paid by wineries on behalf of growers and themselves to government which then provides funding back to the relevant organisation. Therefore, the grower never receives an invoice from the organisation to trigger the value proposition thought process.

² Review Report No. 2018–19/05

movement has never been greater, and as one leading industry figure from the Yarra Valley recently articulated, phylloxera will always be ahead of any zone or line on a map given that it takes years to detect a new infestation. The financial impact of phylloxera in the Yarra Valley has been estimated at \$1 billion, based on replanting nearly the whole region to rootstock and accounting for losses due to production lag. This figure would rise further when other factors such as loss of brand continuity, business value and compliance costs are considered.

This is a powerful reminder of the threat to South Australian vineyards and wineries given that 73% of vineyards are planted on own roots and therefore susceptible to phylloxera attack.

Instrumental to this changing landscape are trends specific to the grape and wine industries that are contributing to the risk of a biosecurity incursion, including:

- Increased consolidation, with regional grape processing being replaced by larger processing facilities that import higher volumes of grapes across regional and state boundaries;
- Increased international ownership of Australian wineries and vineyards, adding complexity to the system;
- Increased specialisation, with more contract vineyard management, pruning and harvesting, raising the risk of cross-regional and cross-vineyard contamination;
- Increased inbound regional wine tourism which provides opportunities for the movement of pests and diseases between countries, states, regions and vineyards;
- Ongoing tight margins for grapegrowers resulting in reduced investment in biosecurity activities; and
- Poor focus on farm-gate hygiene practices.

Enhanced, sustainable investment of time, funds and resources by industry and government is imperative to protect the ongoing prosperity of the South Australian grape and wine industries. Vinehealth has been operating a significant deficit budget for the last 3 years given the volume of work required to address this complex and changing biosecurity landscape. A review of the rate of contributions as per section 23 of the PGI Act is currently pending.

The South Australian wine industry – a powerhouse

The South Australian wine industry comprises³:

- 75,000 hectares of grapevines;
- 550 million litres of wine, equivalent to 734 million bottles;
- 769,000 tonnes of crushed winegrapes (more than 50% of Australia's crush);
- \$2.15 billion in wine production;
- \$1.85 billion in wine exports (62% of Australia's total);
- More than 680 wineries; and
- 8440 people directly employed in grapegrowing and winemaking, and many more indirectly employed.

We need healthy, productive vineyards to supply our wine markets and to keep pace with growth. And we need a mix of young vines, old vines and everything in between to keep up with that demand.

Of the total 75,000 ha of vines planted in SA, there are approximately:

- 66,000 ha of vines aged 0-34 years;
- 6,000 ha of vines aged 35-69 years;
- 600 ha of vines aged 70-99 years;
- 148 ha of vines aged 100 years to 124 years; and
- 100 ha of vines aged 125 years plus.

³ South Australian Wine Industry Association

The oldest vineyards can be found in the Barossa Valley, Eden Valley, McLaren Vale, Clare Valley, Coonawarra, Langhorne Creek and the Riverland.

There are 58 ha of Shiraz in the Barossa, McLaren Vale, Clare, Coonawarra and Langhorne Creek. We also have some 125-year-old plus Cabernet Sauvignon in the Barossa and Langhorne Creek, and similar aged Grenache in the Barossa Valley, Clare and McLaren Vale. The Barossa is also home to 125-year-old plus Mataro, Semillon, Petro Ximenez and Trebbiano.

This rich tapestry of old vine material also helps to populate the state with irreplaceable vine stock, that underpins our viticultural ambitions and traditions.

An incursion of a pest such as phylloxera in South Australia would seriously jeopardise winemakers' ability to meet export demand and undermine the momentum and enthusiasm for Australian premium wine and the window of opportunity that recent Free Trade Agreements have created for export growth. South Australia's reputation for quality wine from a 'clean and green' environment is fundamental to achieving our growth and sustainability ambitions.

Consumers expect quality to be applied on a continuum beginning with processes to ensure the quality and safety of raw products, through every step in the development of finished products. As such, the importance of biosecurity to grapevine health directly correlates with perceptions around the quality of the finished wine.

Value proposition and impact

The impact of Vinehealth on the Australian grape, wine and biosecurity landscape is powerful. With a deep understanding of the grape and wine supply chain and industry dynamics, Vinehealth partners with growers, winemakers, suppliers and industry stakeholders to empower them with tools, information and expertise to safeguard their vineyards and wines from pests and diseases. And in the event of an incursion, Vinehealth will support industry to manage and recover.

Work undertaken by Vinehealth in 2018/19 includes:

- Published 56 articles on pest threats and biosecurity;
- Maintained the Vineyard Register;
- Supported the Loxton fruit fly outbreak response;
- Initiated the development of a National Phylloxera Management Strategy;
- Conducted a full review of SA's Plant Quarantine Standard's phylloxera-related conditions. As part of this, 39 stakeholder meetings were held across 10 regions;
- Translated science for the benefit of industry, including new phylloxera kill rate science;
- Facilitated management of wine industry biosecurity nationally;
- Conducted a Phylloxera Outbreak Simulation with a large winery;
- Responded to 206 service requests via our enquiry line;
- Responded to 5 quarantine related incidents;
- Managed the Grapevine Pinot gris virus project;
- Held 26 biosecurity meetings with local councils;
- Delivered 22 formal presentations at events to raise awareness about biosecurity;
- Educated 135 bus tour companies;
- Supplied 527 wine tourism biosecurity training kits;
- Managed Coonawarra Rootstock Trial; and
- Sold 507 biosecurity signs.

Priorities for the 2019/2020 financial year include critical work such as the development of a robust SA Phylloxera Incursion Response Strategy, finalising the review of SA's Plant Quarantine Standard (both with Biosecurity SA), progressing the development of a holistic national phylloxera management strategy, developing more practical solutions for growers to assist the adoption of farm-gate hygiene practices and progressing the transition to a modern Digital Biosecurity Platform.

In 2017, Vinehealth received an Australian Biosecurity Industry Award, presented by the Department of Agriculture and Water Resources. The award recognises the group's significant contribution to maintaining Australia's wine industry biosecurity integrity.

Safeguarding and advancing biosecurity management for the grape and wine industries

With a 120-year legacy of grape and wine industry buy-in to biosecurity, any potential uncertainty in the future of this shared responsibility (resulting from the proposed inclusion in a new Biosecurity Act without any detailed information) is of concern. Key strengths and qualities of Vinehealth are detailed below. Their preservation is warranted and expected.

Capability and capacity of Vinehealth that must be preserved

Key characteristics of Vinehealth that drive exceptional outcomes for the grape and wine industries:

- Independence
- Biosecurity specialist
- Broad grape and wine technical expertise
- Information through the Register
- Trusted source
- Knowledge of industry
- Connection and engagement with industry
- Accountability to industry and government
- Accessibility
- Action oriented
- Customer focus
- Agility

These fundamental characteristics of Vinehealth have created a unique organisation in which industry has great pride and sense of ownership.

The functions and powers of the PGI Act that enable these characteristics are:

- Degree of independence from central government;
- Oversight by a skills-based, predominately industry-nominated board;
- Broad definition of disease;
- Primary functions across the biosecurity continuum;
- Ability to raise and manage contributions from industry;
- The authority as an Inspector under the *Plant Health Act 2009*;
- Ability to access required data feeds from government sources; and
- Maintenance of a Register.

Current and future opportunities for Vinehealth to strengthen and broaden its capacity to support the grape and wine industries include:

- Involvement in implementation and monitoring of accreditation schemes;
- Greater involvement in preparedness activities such as outbreak modelling and response planning for the industry;
- Expansion of the Register to include all risk creators;
- Vinehealth to provide the feed from the Register for a potential new PIC system;
- Greater scope for involvement in the propagation sector for the grape and wine industries to ensure high health propagation material for industry;
- Greater scope to develop and implement surveillance programs for industry with funding shared equitably between industry and government;
- Extension of biosecurity expertise, activities, campaigns and information across Australia to ensure consistency and adoption – with cost recovery in place;
- Government to contribute to maintaining and expanding Vinehealth's core capability and capacity through co-funding;

- Clarification of roles and responsibilities of Biosecurity SA and Vinehealth, including Vinehealth's regulatory functions and link to matters under the Emergency Plant Pest Response Deed that impact the grape and wine industries; and
- Broadening of Vinehealth's existing role of working with Biosecurity SA to determine action to control an outbreak, to include responsibility to support the industry recover from an incursion and transition to management.

The risk

The risks of losing the key characteristics of Vinehealth are:

1. Loss of leadership in grape and wine biosecurity;
2. Loss of sector specific biosecurity expertise for the grape and wine industries;
3. Loss of industry support for continued and future funding for biosecurity activities and action;
4. Loss of direct link to biosecurity researchers;
5. Disengagement by grape and wine industries to biosecurity, with flow on impacts for other sectors;
6. A decrease in awareness of biosecurity practices and issues;
7. A decrease in farm-gate hygiene adoption; and
8. An increase in non-compliance with state quarantine standards.

Likely outcomes are:

- A high priority plant pest is introduced, spread and established in South Australia, with significant consequences to the grape and wine industries, other agriculture industries, regional communities and supporting businesses;
- Disruption to continuity of grape and wine supply thus limiting the South Australian wine industry to achieve its growth ambitions and support the State government's growth agenda;
- Early detection of pests compromised resulting in greater costs to PIRSA and industry to manage;
- Lack of scrutiny of scientific research, lack of translation of science into practice and therefore, plant quarantine standards containing ineffective disinfestation procedures;
- A greater number of incursions and non-compliance with plant quarantine standards, leading to increased cost to PIRSA and industry to manage, and then for ongoing asset-based protection;
- PIRSA's ability to negotiate market access compromised; and
- South Australian wine tourism sector damaged. 'Offering wine experiences' is the first of six South Australian tourism pillars⁴.

⁴ South Australian Regional Visitor Strategy 2020.

Responses to PIRSA's Draft Directions Paper

Overarching comments

Vinehealth commends the South Australian Government and PIRSA for initiating the process to develop a new Biosecurity Act to strengthen our biosecurity system to ensure that it can respond to current and future biosecurity challenges. Whilst Vinehealth is supportive of this review and the potential improvements it will deliver to lead powers for biosecurity, there is insufficient information to respond as to the benefits of the PGI Act being included in scope. The substantial unknowns present a significant risk to the grape and wine industries.

Insights from Queensland, New South Wales, Western Australia and Tasmania

These states have each developed a consolidated Biosecurity Act, and in the case of NSW an on-line training course for its implementation. Vinehealth requests information as to whether PIRSA has:

- Undertaken a desktop analysis of the process used, lessons learnt, and opportunities missed by each of these states in formulating their new Act.
- Completed a comparison of the powers of the consolidated Biosecurity Acts in Queensland and NSW (and Tasmania) with those proposed for South Australia. There is an expectation that a matrix-style comparison has been completed by PIRSA, to enable understanding of where there is proposed alignment or harmonisation with powers/functions of other states.

Vinehealth formally requests copies of the above to enhance its appreciation of the opportunities and challenges to ensure the grape and wine industries are best placed to contribute to the development of a new Biosecurity Act in South Australia.

Capacity of PIRSA and Biosecurity SA to deliver on a new Biosecurity Act

With the objective of the new Biosecurity Act to ensure a strong and effective biosecurity system for South Australia, Vinehealth seeks further information from PIRSA on the budget and resourcing capacity over the forward 3 to 5-year period. If Biosecurity SA is resource constrained in delivering their functions and powers under the new Act, then the system will inevitably be weakened, the risk of a significant incursion heightened – and reliance on Vinehealth likely increased. Industry must have confidence in PIRSA's and Biosecurity SA's core capacity and capability to deliver the powers of a new Act (irrespective of where the powers and functions of the PGI Act fall). How will PIRSA's business model change in response to the implementation of a new Biosecurity Act?

Clarity of current state versus proposed state

In reading the Draft Directions Paper, it is difficult in many instances to clearly differentiate between the current powers and functions under existing Acts and those that are proposed for the new Biosecurity Act and what will be the impact. A matrix showing current versus proposed, including reasoning and impact is requested, as it would provide a clearer understanding for readers as to the state of play. Without this information it is difficult for readers, including Vinehealth to respond to the Draft Directions Paper.

1. A single piece of framework legislation

While Vinehealth is supportive of a new Biosecurity Act to consolidate the *Plant Health Act 2009*, *Livestock Act 1997* and *Impounding Act 1920*, Vinehealth has significant concerns regarding the limited information provided in this section to describe the impact on the PGI Act and consequently the grape and wine industries. In particular:

- As described in detail in the Background and Context section of this document, Vinehealth is viewed as an independent statutory authority and is not subject to Ministerial control or direction in a general sense. This stature is fundamental to the operation of Vinehealth. Vinehealth seeks clarification on whether it is possible to maintain this structure and governance if the powers and functions of the PGI Act were to be incorporated into a new Biosecurity Act. Vinehealth acknowledges that Crown Solicitor advice has been sought by

PIRSA to determine whether a dedicated Act is required (i.e. the PGI Act) to maintain this structure and governance which is vital to secure ongoing industry funds for biosecurity.

- The structure proposed for the new Biosecurity Act is difficult to interpret in relation to the PGI Act. The only interpretation, based on the information provided, is that the PGI Act would be viewed as an 'industry fund' under a regulation. This is unacceptable to Vinehealth given confirmation of the content of such a regulation would not be available until after the new Biosecurity Act comes into effect. This represents a significant risk for the grape and wine industries as there would be no guarantee as to the scope of such a regulation. In addition, there are vastly different processes governing changes to regulations as opposed to legislation, which presents another risk to continuity of function and use of industry funds for sector specific grapevine biosecurity issues. To this end, if some or all powers and functions of the PGI Act are proposed to be in regulations versus legislation, then Vinehealth requests clarity on the impact for the grape and wine industries.
- The Draft Directions Paper provides no information on deliberations or reasoning that resulted in the proposed framework. It would be helpful to be able to follow a line of thought or business case, rather than the reader being left to interpret. This lack of clarity presents a risk if left as is in the Draft Directions Paper that is distributed more broadly for feedback in 2020.

2. Proposed goals and objects of the new Biosecurity Act

Vinehealth is supportive of the listed goals of a new general Biosecurity Act.

Vinehealth is generally supportive of the objects of the new Biosecurity Act and can see areas in which the current protection of South Australian grapevines could be strengthened. However, the following comments raise key points to be acknowledged:

- The grape and wine industries have been sharing responsibility for biosecurity for 120 years through their investment in Vinehealth's operations and through compliance with accreditation schemes and (generally) South Australian Plant Quarantine Standard (noting exceptions to this will always occur in any industry). A key focus of Vinehealth is to increase adoption of farm gate hygiene practices by industry – an issue for all agricultural sectors.
- Vinehealth endorses the objective for the new Biosecurity Act to give effect to intergovernmental agreements, however, we request further clarity on how the State's approach to biosecurity will be aligned with other states and nationally. South Australia has a proud history of biosecurity and envied evidence of considerable success (our phylloxera-free status and our ongoing dedication to remain fruit-fly free). This has been in part due to the State developing and maintaining different systems (e.g. PGI Act), therefore, where 'alignment' or 'harmonisation' with other states is mentioned, there must be delineation of what is intended. Is it just to give effect to intergovernmental agreements, or does it relate to regulations, standards and the repealing of the PGI Act because such an Act is unique to South Australia? Vinehealth recognises that what might be a priority in one state is a lesser priority in another (e.g. phylloxera). The latter would be concerning given other states continue to remark on the value of the work that Vinehealth undertakes, and industry personnel in other states muse that Vinehealth should be national.

It is the PGI Act and our current structure and function that enable these viewpoints to be made, with industry and other state regulators seeking our expertise under a fee for service arrangement. This would be unlikely if the governance and independence of Vinehealth is altered. Vinehealth strongly argues that any work it can undertake to support grapevine biosecurity management in other states will directly benefit the South Australian grape and wine industries through prevention, eradication or containment of significant pests.

3. Current Acts proposed to be incorporated into the new Biosecurity Act

As stated above, Vinehealth supports the incorporation of the *Plant Health Act 2009*, *Livestock Act 1997* and *Impounding Act 1920* into a new Biosecurity Act. Vinehealth offers no opinion on the inclusion of *Dog Fence Act 1946*, and parts of the *Natural Resources Management Act 2004* and *Fisheries Management Act 2007*. Vinehealth also offers no commentary on the other Acts that should

be included; and our prior requests for more information on the original 12 Acts to be included (and inclusion criteria), have not been met. Vinehealth remains optimistic it will receive this information.

The South Australian grape and wine industries are in a distinct position of advantage with the existence of the PGI Act. The prominent biosecurity work of Vinehealth and the specialist biosecurity capabilities that it holds are acknowledged and well regarded by industry here and interstate. Therefore, it is surprising that the PGI Act is proposed to be fully incorporated into the new Act, without deep analysis of justification, value and impact on industry being included in the Draft Directions Paper. The only reference (section 6.8) regarding issues-based funding measures, erroneously uses phylloxera management as an example.

It is fundamental to this review that it is understood that funding derived through the PGI Act is not ‘issue specific’ for phylloxera, but rather ‘sector specific’ for biosecurity.

The current draft of the Draft Directions Paper does not provide any level of confidence that scenario modelling or critical analysis has been completed on the strengths, weaknesses, opportunities and threats of incorporating the PGI Act into a new Biosecurity Act. Prior to further consultation with industry and stakeholders, and if PIRSA’s position remains that the PGI Act is to be incorporated, it is recommended that detailed work is undertaken to draft the Draft Directions Paper and the necessary information provided to enable readers to form an opinion. Currently, ambiguity in relation to the PGI Act throughout the Draft Directions Paper will cause industry to lack confidence in any proposal, with the fall-back being opposition to any such proposal.

Vinehealth also requests that further options, and their pros and cons, be detailed with respect to the PGI Act. The repeal and incorporation into the new Biosecurity Act is only one option that should be considered with respect to such an important Act for the South Australian grape and wine industries.

4. Proposed key definitions of the new Biosecurity Act

In a general sense, Vinehealth supports these definitions, however, the relationship between ‘biosecurity matter’, ‘prohibited matter’ and ‘carrier’ is unclear. There appears to be cross over between these definitions, with clarity only gained by seeing examples or how they will be used and applied in a new Biosecurity Act.

Vinehealth also notes that the interpretation of ‘disease’ in section 3 of the PGI Act is:

disease means—

(a) any bacterium, fungus, insect, mite or other arthropod, protozoan, virus or other organism or pathogen; or

(b) any other condition, that may affect vines;

Part (b) of this definition is outside the scope of the proposed ‘biosecurity matter’ definition and provides additional scope of the PGI Act that is not contemplated by the new Biosecurity Act. This is an important distinction and no consideration is given in the Draft Directions Paper as to this potential scope change for the powers and functions of Vinehealth and thus the impact for grape and wine industries. In speaking with those involved in drafting the PGI Act in 1995, the intent of part (b) was to ensure that Vinehealth had the ability, with the support of industry, to direct funds and work on any matter that was affecting the health of vines. For example, a nutrient issue, or weather-related matter could be considered to affect vine health and would fall under part (b).

5. Proposed core concepts of the new Biosecurity Act

5.1 Shared responsibility

The existence of the PGI Act and industry’s ongoing investment in and support of Vinehealth’s operations is testament to how the grape and wine industries has shared responsibility for biosecurity over the past 120 years. Through Vinehealth, strong leadership and ownership already exists, and moves to diminish this would be contrary to the call by government for greater industry involvement and investment. In fact, through the current PGI Act, Vinehealth could play an even greater role in biosecurity, by PIRSA outsourcing additional activities such as accreditation to Vinehealth (this has previously been discussed and acknowledged as an option with Biosecurity SA).

Vinehealth is unaware of any other plant industry that has shown such sustained dedication and responsibility for biosecurity. This should be celebrated, nurtured and evolved, to ensure that the vision displayed by the leaders of the wine industry (and government) in the late 1800s, to establish the PGI Act, is similarly demonstrated by the current government to ensure continued protection of South Australian vineyards.

Whilst we support industry opportunity for self-regulation through accreditation schemes, PIRSA's vision of this should be revealed and analysed. The consequence of an accreditation scheme being poorly designed and implemented is a far greater threat in biosecurity, than say for an environmental accreditation scheme that the wine industry operates itself. The latter is used for marketing purposes and to minimise the footprint of the industry on the environment. However, its failure has potentially less ongoing impact than a biosecurity scheme failing that enables the introduction or spread of a significant pest or disease. Such an analysis would also tease out whether this is a means for government to simply shift costs to industry or whether it is to ensure improved biosecurity outcomes.

5.2 General biosecurity obligation

Vinehealth supports the introduction of this concept into a new Biosecurity Act.

Vinehealth asks that PIRSA provides examples of where another state that has developed a new Biosecurity Act has been able to enact this power and prosecute where previously they would not have been able.

Also, we request that PIRSA provides more information of the level of knowledge that would be deemed '...reasonably ought to know...' and how a person would obtain this knowledge. For example, will PIRSA be investing in significant ongoing public and industry communication and awareness campaigns for biosecurity, rather than for more specific issues such as fruit fly?

5.3 Risk-based decision making

Vinehealth endorses risk-based decision making in biosecurity. This is, however, caveated by the recognition that PIRSA is managing risks across all agriculture sectors. PIRSA requires adequate capability, capacity and focus on high priority sector specific risks so that efforts on these are not diluted and the grape and wine industries compromised as compared to other sectors, for example grains or citrus.

Vinehealth trusts that state and federal political motivations would not be incorporated into any biosecurity risk profiling.

5.4 Proactive biosecurity management

Vinehealth generally supports this concept, however seeks further information on how this would relate to endemic pests and diseases in the case of neglected or abandoned vineyards. While Vinehealth is not advocating for such words to be incorporated into the new Biosecurity Act, they do describe a long-standing unresolved issue for our industry. The development of the new Act may provide opportunities to address this issue.

6. Key principles of the new Biosecurity Act

6.1 Governance / delegation

As per previous comments, Vinehealth requests specific information from PIRSA as to the impact on the grape and wine industries. In particular, under section 27 of the PGI Act, members of the Board of Vinehealth are inspectors under the existing *Plant Health Act 2009*. Board members of Vinehealth have been used as inspectors and the provision in the Act for this responsibility influences the governance of Vinehealth and the considerations given in nominating potential board members. Vinehealth seeks to understand PIRSA's intent with regard to this provision in the PGI Act, as it should be preserved and not at the discretion of the Chief Inspector. Vinehealth endorses clarity in relation to roles and responsibilities of various agencies / organisations involved in biosecurity management for the grape and wine industries.

6.2 Statutory positions

Pursuant to section 27 of the PGI Act, members of the Board of Vinehealth are inspectors under the *Plant Health Act 2009*. This enables Vinehealth to perform surveillance activities, assist with incursion management, undertake functions in relation to the nursery and vine improvement sector, assist incident/non-compliance investigations and obtain information. Further discussions with PIRSA and legal counsel are required to understand the impact on Vinehealth of no longer having the powers articulated in section 27 of the PGI Act. Vinehealth acknowledges the need for clarity around the relationship / role / responsibility about this power.

6.3 Registration

Detail is lacking in this section. No reference is made to the current national PIC conversation. Vinehealth requests further specific information on: 'threshold levels' and requirements for information underpinning a person's approved 'registration'.

Pursuant to part 3 of the PGI Act, Vinehealth maintains a Register of all vineyards of 0.5 hectares or more of planted vines in South Australia. This Register contains ownership, land, and planting information and any other details relevant to the functions of Vinehealth. This is an extraordinary asset for the State and its accuracy and relevance has been maintained for 120 years. The ongoing maintenance of this Register and the power/authority to collect information that informs this Register (as per section 19 of the PGI Act), is vital to the ongoing prosperity of the grape and wine industries.

The degree of independence of Vinehealth (from central government) facilitates the provision of much of the data required for the Register. The Register continues to prove its value as documented in Vinehealth's annual reports. Vinehealth is currently in the procurement process of a new Digital Biosecurity Platform that will utilise contemporary technology and modernise the architecture, capacity and capabilities of the existing Register. This is a truly innovative ag-tech project that will leverage data in the Register for better biosecurity outcomes for industry.

6.4 Accreditation authorities

Vinehealth endorses the proposal that the new Biosecurity Act may provide the ability to recognise non-government organisations as accreditation authorities, who in turn may accredit private certifiers and auditors. The current PGI Act (section 13(1)(h)) makes provision for Vinehealth to accredit providers of high health propagation material and this provision must be preserved. It is also recommended that prior to outsourcing by PIRSA, Vinehealth is given the first right of acceptance to perform accreditation activities associated with any grape and wine industry scheme.

Confirmed and agreed funding and cost recovery options for such accreditation activities would be required prior to outsourcing, as any increased cost to industry needs to be understood now, and industry consulted. This view supports the earlier note in this document that greater understanding of changes to PIRSA's business model as a result of proposed content of the new Biosecurity Act is needed.

Vinehealth's support of using alternate accreditation authorities is made on the proviso that PIRSA put in place robust measures surrounding the governance and processes to assess the competency of a provider.

6.5 Biosecurity audits

Vinehealth agrees that audits are an integral part of existing accreditation schemes. In relation to investigative audits, Vinehealth queries whether in fact third parties should undertake these, rather than the compliance team at Biosecurity SA, given that penalties may apply. A point for further discussion.

Feedback received from industry on audits currently undertaken for accreditation schemes (that Biosecurity SA administer), suggests that improvements are warranted before seeking to outsource this activity. The way in which some auditors undertake audits, unfortunately diminishes the integrity of the accreditation scheme and industry engagement, in the process.

PIRSA should explore any opportunity through the Sub Committee for Domestic Quarantine Market Access or Plant Health Committee, to develop greater national consistency of auditing procedures for accreditation schemes that run across states.

It is also worthwhile noting that Vinehealth is currently investigating greater engagement with contractors and carriers in the grape and wine industries. Some industry stakeholders have suggested that we develop a contractor biosecurity accreditation/assurance/endorsement system.

Vineyard owners could then preferentially use contractors with this certification, providing confidence that the contractor is biosecurity aware. Currently, Vinehealth is developing materials and awareness campaigns to increase contractor awareness of required biosecurity practices.

6.7 Identification and traceability

Vinehealth agrees that identification and traceability is vital to managing an incursion and for prevention and preparedness activities.

Vinehealth has most of the information for the grape industry in South Australia, in its Register. The Register is a geo-spatial database and based on land parcel details and it holds more information than that required for a PIC system. In general, a PIC scheme is not sufficient to serve as a traceability scheme but the additional Register information (built up over more than a century) allows traceability to be more effective, efficient and timely, as is biosecurity management. A discussion is sought with Biosecurity SA to streamline the establishment of a PIC system for vineyards and the role of the Register in facilitating this and ongoing maintenance.

For the grape and wine industries, traceability needs to commence with propagation businesses, that being vine improvement associations and nurseries. These propagators sit outside the Nursery and Garden Industry Australia system. Vinehealth continues to liaise with Biosecurity SA staff who are working on the development of a suitable PIC system.

In relation to the privacy legislation referenced, the grape and wine industries need to understand how information from a PIC system (as it is for Vinehealth's Register) can be accessed and used by government. Experience with our Register tells us that other government departments, agencies and industry organisations regularly seek the information for their purposes (mostly nothing to do with biosecurity).

6.8 Cost recovery / co-investment / co-funding mechanisms

Vinehealth seeks further information on '...cost recovery initiatives to be established for any service provided under the new Act or its regulations...'. A list of services on which cost recovery would be sought is required. In its absence, the potential burden on industry remains unknown and a decision in support, highly unlikely. In addition, the existence of a levy collection mechanism under the PGI Act currently enables co-investment by the grape and wine industries. The introduction of cost recovery for general services could potentially undermine the ability of this levy mechanism to continue functioning and is of concern. Is a broad-based charge/levy applied across all primary producers (or similar), such as the Emergency Services Levy, envisaged?

It is unlikely that industry would continue to pay a levy (as currently done under the PGI Act), if the levy proceeds were destined for consolidated revenue (despite assurances otherwise and ring-fencing promises). Uncertainty surrounding security of these funds for activities for the grape and wine industries would erode ongoing support. The high degree of accountability of Vinehealth back to industry and its independence drives continued support. There is a real risk that changes proposed in the Draft Directions Paper will threaten ongoing investment by this industry in biosecurity (despite the 120-year successful practice under the PGI Act).

It is essential to reiterate and reinforce here that the PGI Act is sector specific for biosecurity and vine health matters, and not issue specific for phylloxera.

In relation to recovery of costs associated with compliance action, the position as proposed seems reasonable. However, clarification is needed: would this apply only in cases of proven non-compliance? to accreditation schemes? in addition to biosecurity legislation/regulations?

6.9 Compensation / reimbursement

Vinehealth agrees with the stated proposal.

6.10, 6.11, 6.12, 6.14 Permits; Biosecurity control orders; Biosecurity zones; Prohibited matter declaration and listing

Vinehealth requests an opportunity to discuss these items with Biosecurity SA staff to determine how proposed changes compare with existing powers and operations, and therefore the pros and cons.

6.13, 6.15 Emergency provisions; Appeals

Noted.

6.16 Extraterritorial powers

Vinehealth requests further information to clarify how this is currently managed relative to that proposed for the new Biosecurity Act. For example, we understand that there are existing arrangements in place between South Australia and Victoria regarding the management of fruit fly (as per current Lindsay Point fruit fly outbreak), but request information/examples as to:

- How this power may be used practically for the benefit of South Australia?
- Why Queensland and Western Australia excluded such powers in their new Biosecurity Acts?

This additional information will help inform a decision on whether such powers would be supported, should they be included in the new Biosecurity Act.

6.17 Authorised officer powers

Vinehealth agrees that Authorised Officers require strong powers, however it is unclear from the information, the degree of change being proposed for the new Biosecurity Act.

6.18 Offences / strict liability offences / vicarious liability offences / defences

Vinehealth agrees in general, but also recognises that legal counsel and expertise must determine the best approach to achieve desired outcomes. With the limited information provided, it is difficult to draw a definitive conclusion.

In relation to vicarious liability, Vinehealth queries how this links in with general biosecurity obligations and would the negligent employee be prosecuted in addition to the employer? From an industry perspective, this may present a motivation for action, such that employers will need to more formally address staff training, monitoring and evaluation with regard to biosecurity practices. Has vicarious liability been included in new Biosecurity Acts in other states, and if so, has it been successfully used to prosecute an employer?

6.19 Penalties

Vinehealth has previously received feedback from industry that the current penalties are not commensurate with the significant risk of non-compliant activity and the value of the industry to the State's economy. Current penalties and the chance of prosecution are not currently seen as a deterrent. Further, historically there seems to have been little appetite/resources within PRISA to prosecute. For example, in 2015 a grape harvester was trucked directly from the Yarra Valley (a Phylloxera Infested Zone) in the middle of harvest into South Australia via the Pinnaroo border crossing. The harvester was destined for a premium wine region in South Australia to start harvesting. It was fortunate that there was an inspector at the border crossing when the truck arrived. The harvester had not been cleaned or heat treated and was therefore in breach of both Victorian and South Australia biosecurity laws. The truck was turned back to Victoria. Lack of prosecution in this case, was inadequate.

Vinehealth and the grape and wine industries are eager to see further detail as to the proposed hierarchy of enforcement tools, proposed incentives and how they would be implemented, and

PIRSA's ongoing commitment to ensuring capacity to monitor, enforce and prosecute non-compliance.

Vinehealth strongly endorses strengthened penalties, ready but fair enforcement and application of them, and clear indications that penalties for non-compliance are commensurate with the biosecurity risk. Further information on incentives to balance the 'carrot' and 'stick' approach and to ensure true engagement by industry, is worthy of discussion. However, if one looks at Work Health and Safety, legislative change and enforcement were the drivers of significant and sustained behaviour change in workplaces in the last 20-30 years. Despite obvious differences, it is a valuable analogy to investigate. In relation to the offender repairing damage versus receiving a fine, both are likely to be suitable.

6.20 Reasonable suspicion versus proof of evidence

Vinehealth agrees with the ability to act on 'reasonable suspicion' acknowledging that there will no doubt be criteria or a definition around what constitutes 'reasonable suspicion'.

7. Specific matters to be considered in the development of the new Biosecurity Act

7.1 Stray and abandoned livestock / impounding

Not relevant to the grape and wine industries.

7.2 Distribution of chemicals and baits

Further detail would be required to support an informed comment, but we acknowledge the importance of chemicals and baits for biosecurity management.

7.3 Access to property by a third party

Vinehealth agrees that third parties legally entering a property must share responsibility for biosecurity and there must be systems in place to facilitate this. Vinehealth queries the use of the general biosecurity obligation for this group, in terms of whether it is strong enough to facilitate prosecution and deliver significant penalties. This group has an important responsibility to protect the properties that they enter. It is also prudent to be mindful of the current debate surrounding mining companies and access to agricultural property, and how biosecurity may be used to advance other causes.

Vinehealth queries whether PIRSA conducts training and awareness with mining and utility companies as to their shared responsibility for biosecurity? This plays into the 'reasonably ought to know' sentiment under the general biosecurity obligation and the ability to prosecute a case against a person.

7.4 Trespass

Noted, with no further suggestions offered.

7.5 Exotic aquatic organisms / noxious aquatic species

Not relevant to the grape and wine industries.

7.6 Invasive species

Agree.

7.7 Biofouling

No opinion offered.

7.8 Use of chemicals / chemical residues

Agree.

Vinehealth looks forward to working together with PIRSA to improve biosecurity management for the grape and wine industries and to progressing the development of a new Biosecurity Act.

Contact

Prue McMichael

Chair, Vinehealth Australia

Mobile: 0407 606 461

Email: spmcm@adam.com.au

Inca Lee

CEO, Vinehealth Australia

Mobile: 0418 818 543

Email: inca@vinehealth.com.au