

PO Box 12009 George St, Level 6, 183 North Quay, BRISBANE QLD 4003
Phone: 07 3837 4747 Fax: 07 3236 4100 Email: qfarmers@qff.org.au Web Site: <http://www.qff.org.au>

3 May 2008

Quarantine and Biosecurity Review Secretariat
Department of Agriculture, Fisheries & Forestry
GPO Box 858
CANBERRA ACT 2601
Email: quarantinebiosecurityReview@daff.gov.au

Dear Sir/Madam,

Please find attached the submission from the Queensland Farmers' Federation to the Quarantine and Biosecurity Review. The Federation appreciates the extension provided by the Review and the opportunity to input into this important Review.

QFF represents the interests of the intensive agriculture sector in Queensland, including horticulture, sugar cane, dairy, chicken meat, aquaculture, cotton and nursery production. Our sector contributes over \$5 billion to the State's GVP and generates over 35,000 jobs. Our member organisations include CANGEGROWERS, Growcom, Queensland Dairyfarmers' Organisation, Cotton Australia, Nursery & Garden Industry Queensland, Australian Prawn Farmers' Association, Queensland Irrigators' Council, and Queensland Chicken Growers' Council.

QFF wishes to lend support to the submissions to the Review provided by Growcom, Nursery & Garden Industry Australia, the Australian Chicken Meat Federation and the various rural commodity groups representing our members. This submission does not seek to deal with all the issues covered in this Review, but deal with some of the broader issues of Federal and State co-operation.

Please feel free to contact me should you require further information.

Yours sincerely



John Cherry
Chief Executive Officer
Queensland Farmers' Federation

QUARANTINE AND BIOSECURITY REVIEW ISSUES PAPER

RESPONSE BY THE QUEENSLAND FARMERS' FEDERATION

1. Broad objectives of quarantine and biosecurity policy:

The Queensland Farmers' Federation (QFF) represents the interests of the intensive agriculture sector in Queensland, including horticulture, sugar cane, dairy, chicken meat, aquaculture, cotton and nursery production. Our sector contributes over \$5 billion to the State's GVP and generates over 35,000 jobs.

QFF seeks to ensure a robust, effective, science based biosecurity and quarantine framework. A quarantine system that maintains Australia's relatively pest and disease free status along with our reputation as a supplier of fresh, high quality, clean produce is of the utmost importance to the Queensland agriculture industry. We must be vigilant in ensuring that status, and the checks and balances that support it, remain second to none in terms of risk management. Effective quarantine controls contribute towards preventing the importation of exotic pests and diseases that lead to crop losses as well as a loss of markets access.

QFF is committed to working with its partners, governments and other stakeholders to ensure that biosecurity standards are maintained at the highest level, and that quarantine risk assessments are based on sound science and transparent decision making processes.

Good quarantine policy is a continuum that includes elements of both preparedness for, and prevention of, disease and pest incursions. Governments must actively use their resources to assess import applications, prevent and combat pest and disease incursions as well as fund and coordinate eradication procedures. These activities must leave the international community without doubt that Australia's quarantine and risk assessment regimes are developed and operated independently, and are based solely on sound scientific principles and analyses rather than industry protection.

QFF is seeking progress in the area of world trade reform, contingent upon maintaining a very conservative level of quarantine protection. Australia's quarantine protocols are designed to defend the integrity of our environmental and production areas rather than as a barrier to free trade. In order to ensure high levels of quarantine control, a transparent risk assessment process based upon sound science and vigilant quarantine systems is required.

2. Risk across the quarantine and biosecurity continuum

QFF welcomes the approach of this Review in conducting a review of emerging threats, and has also been urging the Queensland Government to conduct a comprehensive review of new and emerging threats for several years.

QFF supports the maintenance of Australia's Appropriate Level of Risk as 'very low'. This conservative approach has served Australia well. However, there is not a clear understanding of what is meant by a very low level of risk, particularly by producers. This discussion needs to be had with stakeholders particularly at the beginning of Import Risk

Assessment processes (IRAs.) The process of determining acceptable risk must be holistic and include all stakeholders and not be limited to the industry seeking the application or challenging the application. This process needs to recognise that the level of acceptable risk identified by government can have significant impacts on both individual growers and industry. Growers currently have little or no effective say in what is deemed an acceptable level of risk – even though they ultimately bear much of the cost burden in the event of an Emergency Plant Pest and Animal.

QFF is concerned that there has been a consistent lack of prioritisation by governments to the threats and costs, to the community and industry, of exotic plant pest incursions into the country over the past 10 years. This has inevitably led to increased costs for industry in terms of crop losses, mitigation programs, compliance protocols and restricted or closed market access. Declining investment in biosecurity across Australia at both a national and state government level has been particularly noticeable within the plant industries, with in some instances off-shore facilities being recognised by governments that have a poor creditability record, staff that are unskilled and where corruption within agencies is known. We draw the Review's attention to comments by NGIA and Growcom on these issues.

QFF and its members have in the past been concerned that Biosecurity Australia has been compromising the scientific basis of IRAs to further Australia's trade agenda. Recent and past controversies concerning the IRAs for apples, bananas and pig meat have led many producers to become very concerned about the future of Australia's biosecurity system. The current import risk analysis process, while significantly improved in 2006-7, would continue to benefit from further streamlining to minimise delays and alleviate international and domestic pressures on the system. While the IRA process is science based, there is still a significant element of judgement implied in making 'scientific assessments', and this needs to be acknowledged. The IRA process would also benefit from further refinement to address issues such as:

- The enormous cost and effort undertaken by industry in responding to IRAs, some of which can be underway for many years, requiring several submissions from industry to complete policy, technical and scientific responses.
- The capacity of industry representatives to deliver a substantial industry response to government varies significantly, and can significantly disadvantage smaller industry and increase their risk profile unfairly.
- The need for ongoing engagement with stakeholders in order to enable amendments and improvements to the processes and systems put in place, particularly on alterations to import conditions that are in the final IRA.
- The need to consider social and economic factors, particularly in the context of acceptable risk.
- Timeframes should not result in quick decisions being made by government to finalise a process prematurely.
- Reconsideration of products coming into Australia that have not yet gone through an IRA process.

Australia needs to learn from the enormous costs of the equine influenza issue outbreak. First, it highlights what the cost can be of what happens when biosecurity threats get out of control. Second, it shows that the State Governments such as Queensland have not provided agencies like Biosecurity Queensland (BQ) with enough resources to adequately deal with major threats while maintaining its other essential biosecurity services. Third, it

shows that BQ does not have the capacity or resources to continue progressing on core agency functions when dealing with a major threat. It has been intolerable that BQ has dropped the ball on some core issues relating to plant health security because resources have had to be redeployed to the equine response. Plant inspections for interstate export certification have been delayed due to reprioritisation of staff, placing Queensland exporters at a disadvantage. Progress on developing industry self assurance programs has been virtually non-existent this year due to lack of priority and staffing. Federal and State agencies more generally continues to give inadequate attention to the need to facilitate interstate trade in horticulture and nursery products, a market worth over \$400 million a year to Queensland alone.

Federal and State agencies provide considerably more funding for animal health issues compared to plant health issues. Funding for animal health issues within BQ is 57% higher than for plant health issues despite the fact that in Queensland crops provide around half the value of agriculture, as well as providing feedstock for animal industries. This imbalance needs to be redressed.

The inadequacy of existing resources for biosecurity needs to be considered against the growing risk profile within which Australian agricultural industries operate:

- Trade movements are expected to increase markedly, with the Port of Brisbane reporting container movement increases of around 14% a year projected to increase.
- The IPCC report on climate change highlights that Queensland is particularly vulnerable to increased biosecurity risks as climate changes. The distribution of plant pests could change dramatically with potential temperate habitat extending into the southern regions of the continent, with infestations populating at faster rates due to increased lifecycles (e.g. egg – adult).
- Hobby farmers and growers in peri-urban areas are growing in number and need to fully understand biosecurity risks and their responsibilities. This needs to include further analysis and targeted R&D extension activities regarding the heightened biosecurity risks posed by increased levels of peri-urban agriculture;
- Free trade agreements must not in any way diminish the principle that quarantine matters be based on pure scientific assessment
- A number of existing protocols required by AQIS for the growing of plants in quarantine facilities need to be advanced to accommodate industry best practice. This is particularly relevant to the growing media and nutritional aspects of plant production undertaken at these facilities. AQIS needs a system that provides an avenue for industry to advice on sound plant management techniques.

QFF and its member bodies are strongly supportive of the Northern Australia Quarantine Strategy, which is a good example of Federal and State agencies, industry and the community working together to reduce the risk of incursions. This Strategy needs to remain a key priority of Government.

3. The legislative framework

QFF supports the final decision on an IRA continuing resting in the Secretary rather than an independent agency where the broader consequences can be considered and the limitations of the science fully appraised.

QFF supports an independent institutional structure for Biosecurity Australia (BA) but believes that the Secretary should continue to be the overall Director of Quarantine.

QFF supports the separation of the export facilitation policy function from the import risk function between BA and DAFF. This separation is fundamentally important in maintaining grower confidence in the system as a whole.

QFF supports the view of the Australian Chicken Meat Federation that human health issues should continue to be dealt with under the auspices of the quarantine system, rather than with the added complication of cross institutional issues with Health agencies assuming responsibility. DAFF should ensure that full cooperation with relevant Health agencies occurs to ensure that information is fully shared.

4. Jurisdictional and institutional arrangements

A coordinated national approach to biosecurity must be agreed and implemented by government as a matter of urgency. QFF strongly supports the findings of the Agriculture and Food Policy Reference Group in this regard. Enhanced preparedness and impact mitigation greatly increase the chance of eradication and limit the ability of pest and diseases to become established. There is a need to define roles and responsibilities more clearly and to develop decision making processes for existing strategies, legislation and operational procedures. State and Federal agencies need to be realistic and pragmatic dealing with each other, focusing on practical technical issues rather than political outcomes. Agencies also need to ensure that producers and their representative bodies have realistic and current understandings of the requirements for federal support.

A national coordinated approach should seek to address the operational issues currently impacting on the effectiveness of Federal and State agencies which include:

- Decreasing national and state resources committed to biosecurity & quarantine;
- Loss of technical expertise in national and state agencies, particularly declining skill base and diagnostic capacity;
- Inadequate stakeholder consultation & recognition, such as on declaration areas;
- Failure to recognise industry on-farm biosecurity programs;
- Paper based interstate documentation (opportunity to go electronic);
- Poor capacity to attend to pro-active market access strategies (e.g. development of EPP Interstate Certification Assurance arrangements – ICA's);
- Lack of state quarantine and biosecurity uniformity (restrictions, quarantine zones, pest freedom & protocols) across Australia;
- Need to Review capacity to identify and respond to new and emerging threats are recognised and planned for.
- Lack of consistency between each state's biosecurity response;
- Lack of strategic policy development, particularly at the State level, to consider the broader policy implications (eg impact on industry, facilitation of interstate and

overseas trade, environmental and community considerations, long term approaches) in recommending appropriate courses of action.

There needs to be a substantial increase in the core resourcing of the States' biosecurity and quarantine services to increase its response capacity and its monitoring and awareness raising activities. Resourcing of the response to biosecurity emergencies at a State level needs to come out of State emergency contingency funds rather than core agricultural departmental Budgets. There might also need to be a review of Commonwealth funding arrangements to pick up very costly emergency response above some agreed threshold recognising that the States also need to maintain ongoing services to agriculture to meet broader productivity objectives and can be constrained from doing so when costs of meeting incursions are expected to be met within existing departmental budgets.

The establishment of a single State agency to combat biosecurity threats in Queensland was a major election commitment by the Beattie Labor Government in 2006. Two years later, little has improved in the service provided by BQ with many industries reporting further declines in the capacity of BQ to undertake the primary tasks of market access and state surveillance. The agency has taken too long to manage machinery of government changes, has failed to address industry concerns for changes of strategy and priorities, and has not been able to provide adequate funding for capacity building of industry and agency planning due to continuing emergency situations. Further, the failure of the State Government to develop an emergency response funding mechanism has meant that other core capacities are starved of resources to fund emergency responses. The following extracts from the 2006-7 DPI&F Biosecurity Queensland Performance Review report highlight this difficulty:

- “The Animal Biosecurity program fully delivered 18 of the 20 Ministerial Portfolio (MPS) elements it reported to during 2006-7. The annual legislative program was not achieved due to the formation of Biosecurity Queensland and the necessary amendments to timelines to meet organisational planning needs....Compliance audits for interstate certification accreditations was not delivered as a result of resource constraints and reallocation to higher priority activities.” (p.114)
- “Overall the Plant Biosecurity program has delivered sound progress against major targets covering surveillance, certification and market access, and incident investigation and response obligations. However, this progress has been hampered by the diversion of significant program resources and expertise to responses to incursions of sugarcane smut and other emergency plant pests. (p.132)
- “DPI&F has continued to undertake an increasing number of investigations into suspect emergency plant pests in imported items that have been referred by AQIS since a change in their policy in 2006. The bulk of these have involved pests of timber in service....Responding to these referrals has also put additional strain on Plant Security resources impacting on the ability to deliver core Biosecurity objectives. (p.133)
- “Targets aligned to the key activity areas of Early Warning Surveillance and Public Awareness and Community Assisted Surveillance are also at risk due to resource limitations caused by secondment of staff to the emergency plant responses and two key staff leaving their positions in Cairns to complete further studies. These vacancies have had a significant effect on the program's ability to complete lower priority targets. (p.133)
- “Targets aligned to the key activity areas of Risk Analysis and Epidemiology and Diagnostic Systems are at risk due to the ongoing effects of the diversion of key staff to

- the emergency response to the sugarcane smut outbreak and ongoing commitments to facilitating industry management of the disease in Queensland,. Resource limitations with diagnostic service providers in Delivery are contributing to this problem. (p.133)
- “The Biosecurity Queensland group achieved 91.91% of all program outputs for the five previous programs, with 4% of ongoing activities being at risk and a further 4% being unachievable. Nearly 70% of these unachieved or at risk outputs occurred in the Plant Biosecurity Program as a result of diverting resources across to sugarcane smut emergency responses. The BQ group has continued to manage some significant emergency responses and incidents which continue to impact upon resource allocation to core planned program activities. These include electric ant and Asian honey bee incursions in Cairns, suspect Hendra virus and anthrax, exclusion testing for avian influenza/Newcastle disease virus, TSE, Australian Bat Lyssavirus and sensitive animal welfare cases. These impacts have been managed.” (p.198).

QFF has no doubt that the emergency response to equine influenza in 2006-7 had an even greater effect on BQ’s core priorities than the response to sugar smut in 2005-6. It seems that Governments continue to be ‘surprised’ when there are major biosecurity outbreaks. Yet in the last six years, the State has had to battle the major, virtually annual crises of fire ants, citrus canker, sugar smut, and equine influenza. QFF cannot understand why a core ‘emergency response’ capacity cannot be built into BQ’s structure and funding so that the other important activities can continue to go on without a re-division of resources. Economically, it would make sense, because if the State continues to underinvest in public awareness raising, community and industry assisted surveillance and building industry capacity, then the risk of major outbreaks (and hence the cost) of future incursions only increases. The golden rule of biosecurity issues remains that the most cost effective means of control is prevention. Yet, in many ways that activity has the lowest priority in the day to day resource allocation within BQ.

A needs based assessment by NGIQ has identified a number of criteria that need to be addressed by Biosecurity Queensland including; market access driven strategies and policy, industry training, preparedness support plus systems recognition through on-farm programs (FMS), cost minimisation including on-farm inspection fees, resourcing allocated to the development of pest specific certification guidelines (ICA`s) and the upgrading of the outdated paper based tracking systems and record keeping to an electronic format.

While BQ’s staffing profile has been artificially inflated by the Fire Ant Control Centre (FACC) figures over the last four years (and last year by the special allocation for smut response), and the decline of the FACC establishment has been marked, it is clear that the portfolio has not been provided with meaningful new funding for its core functions:

QDPI&F Biosecurity functions staffing

	2004/5*	2005/6*	2006/7#	2007/8#
Biosecurity services	375.86	350.53	n.a.	n.a.
FACC	430.55	366.68	n.a.	n.a.
DPI&F biosecurity group	806.41	717.21	489	n.a.
Staff transferred from DNR&W	n.a.	n.a.	181	n.a.
Total BQ	806.41	717.21	670	595

(*DPI&F annual reports, #DPI&F Ministerial Portfolio Statement)

QFF's 2007/8 State Budget Submission called for an \$8 million increase in annual funding for Plant Biosecurity to bring it on par with Animal Biosecurity. The funding allow for:

- Core capacity building priorities needed to reduce future biosecurity risks e.g. the development and recognition of industry biosecurity plans and systems; Early Warning Surveillance; Public Awareness; Community Assisted Surveillance;
- Work with industry to develop training and on-farm support tools that support a greater participation in pest & disease surveillance by growers and up-skill industry in all aspects of biosecurity from pest identification and monitoring to record keeping and on-farm capacity building to address biosecurity risks;
- Additional resources to specifically prioritise interstate trade and Interstate Certification Assurance (ICA) delivery, including increased availability of Plant Health Inspectors, drafting and coordinating ICA development for plant pests, linking of ICA's to FMS programs, auditor training and industry program auditing.
- Link interstate biosecurity protocols to the Farm Management System programs (e.g. BioSecure *HACCP*), including promoting acceptance of industry programs as the equivalent for meeting specific state pest protocols;
- Develop the electronic plant health system and drive it through to acceptance at a national level;
- Strategic level research to identify and meet future needs including risk analysis and epidemiology; and diagnostic systems;
- Biosecurity web based information accessible by industry covering the national up to date interstate quarantine information relevant to plant health.

QFF called for a \$5 million increase in annual funding to establish and Emergency Response capacity as a permanent standing function within BQ separate from the core ongoing activities. This capacity should be designed similar to other State emergency services with a capacity and access to contingency reserve funding to rapidly ramp up activities as required.

QFF also called for a \$.5m additional annual funding for three years as the Queensland Governments contribution and implementation of the National Fruit Fly Strategy. All State and Territory Governments, the Federal Government and industry groups have been working through Plant Health Australia since 2006 to develop a cohesive national fruit fly strategy. Fruit flies are the single most significant horticultural pest that has a huge impact on interstate and international trade. They are also a major quarantine threat to Australia with many non endemic species in neighbouring countries. The papaya fruit fly incursion in the mid 1990s was an example of an incursion that cost Governments \$30m to eradicate and industry costs estimated at around \$100m. This investment in the strategy will deliver better protection, better preparedness and better market access.

5. Culture, efficiency and resourcing

QFF believes that Federal and State agencies should have a clear operating principle of minimising industry compliance costs for biosecurity as far as practicable. Agencies should seek to proactively recognise and promote and support the further development and refinement of industry programs, particularly as an alternative mechanism for Interstate Certification.

AQIS certification systems needs to provide recognition of appropriately audited industry assurance programs as cost effective alternative to costly AQIS and DPI&F inspection arrangements. Around 50- 70% of Queensland's horticultural produce is traded interstate. The ICA process is seen as a significant impediment to free interstate trade to allow access to markets on a reasonable basis. While the introduction of this system has been of great assistance to growers trading interstate, there are several major flaws in the operation of the system that must be rectified:

- The lack of uniformity in requirements between state jurisdictions;
- The lack of training options for accreditation of auditors and inspectors;
- The large number of commodity classifications;
- The high number and lack of co-ordination of inspections and audits required - eg. Freshcare, ISO 9000, QA, ICAs all require audits and inspections;
- All negotiations are one state government to another state government, with minimal opportunity for industry input, and no timeframes or uniformity;
- Changing products and procedures without adequate consultation;
- Inflexibility of enforcement procedures.

QFF raised its concerns with the ICA process with the recent Productivity Commission Review of Regulatory Burdens on Primary Industries. The Commission noted that “a Review of the Interstate Certification Assurance Scheme to develop national standards and procedures is planned and will address some concerns”. QFF supports such a Review but is yet to see timeframes or terms of reference. This reflects our broader concern that the Federal Government (including the terms of reference for this Review) provides inadequate priority to interstate agricultural trade issues.

The current biosecurity system and market signals provide little incentive to growers to improve on-farm biosecurity practices. While integration of biosecurity into existing Farm Management System programs and quality assurance systems will provide a driver, cost will be a factor in uptake. QFF recognises that this conundrum needs to be resolved, and would urge this Review to recommend stronger incentives and recognition for onfarm biosecurity program development and adoption.

QFF would also like to draw the Review's attention to the concerns raised by the NGIA on the performance of AQIS inspection services for plants for export, including:

- General increases in fees and charges over the past 5 years to a level that in some instances reduces the financial viability of the activity (import/export);
- Inconsistent phytosanitary interpretation across AQIS officers (inter & intra state), and the need to standardise documents across Australia and improve the way documents are written, interpreted and distributed across AQIS staff.;
- Lack of uniform protocols within AQIS for export inspections of nursery stock .

6. Communications and consultation

QFF is of the view that the overriding legislative and policy objectives for agencies should set effective industry engagement at all levels as a key operating principle, along with proactively working with industry programs. Governments and representative organisations must communicate Australia's quarantine and biosecurity policy settings more effectively in order to improve understanding of these complex issues. Too often, communication and meaningful stakeholder engagement between agencies and industry has been poor, with many issues producing little progress over many years. This is a pity, as the depth of knowledge that exists within agricultural industries could provide solutions to many of these issues, thereby delivering meaningful 'shared responsibility' outcomes along the entire biosecurity continuum

A high level of awareness, preparedness and capacity is required by government and industry at pre border, border and post border levels to manage biosecurity risks. Many projects and initiatives have demonstrated the importance of on-farm biosecurity activities. However, it appears that biosecurity is not something that growers generally see as a prime consideration in how they operate their businesses, partly due to the lack of meaningful incentives to improve on-farm biosecurity practices. QFF has always advocated that biosecurity is one of the key risk management activities that should be incorporated into holistic Farm Management Systems. Federal and State agencies need to provide more support for this to occur so that growers have the tools and the incentives to recognise the biosecurity risks that threaten their livelihoods and the need to implement on-farm biosecurity processes to identify, manage and respond to those risks.

There needs to be improved industry engagement at a Federal and State level to build awareness, preparedness and response capacity. The sugar smut response in 2006 was an example of a response where QFF and its members were broadly happy with the degree of consultation between Federal and State agencies in developing the response. By contrast, there were considerable failures in the citrus canker incursion response by AQIS and QDPI&F which were identified by the Senate Rural Affairs Committee that still need to be addressed. The trust deeds and Plant Health Australia and Animal Health Australia have played a positive role, but consistency in application is still a matter of political will. Agencies need to learn from experience as they move forward.

QFF is concerned that Federal and State agencies still fall short in their day to day operations in effectively engaging with industry, particularly on the important issues of capacity building, policy development and risk prevention. The 'emergency of the day' always gets priority over these important activities. Federal agencies generally have a poor record of developing effective consultation mechanisms with industry on the ground, too often relying heavily on 'formal' Canberra based consultative mechanisms. Industry organisations are under increasing pressure to apply their limited resources to a growing list of requests from Governments for 'input' as well as providing the ongoing services to their own members. Few Government agencies have shown any sign of understanding how best to interact with industry bodies, and as a result are often deprived of valuable information. Too often, agencies see 'consultation' as swamping industry with complex documents and insisting on a response by an unrealistic date. Industry does not have the capacity to respond, in a considered and meaningful way, under these tight timeframes and excessive volumes of material. QFF supports the NGIA's view that AQIS and BA must have an established policy that dictates the more reasonable distribution, consultation and response

times of any activity, with a commitment to provide concise and clear summaries of the issues and criteria being considered.

Informal discussions closer to the grass roots are often more likely to yield the information that Government needs. QFF wishes to lend support to the proposal from Growcom for the outsourcing also would strongly urge the Review to consider a Commonwealth/State arrangement for placing Industry Engagement Officers in industry bodies as DIMEA does to ensure two way communications channels are kept open.

QFF also supports Growcom's view that interception data collected by AQIS should be made available to PHA and state biosecurity agencies to ensure the resources and effort placed on risk mitigation activities are appropriately directed.

7. Research

Effective R&D has been a cornerstone of Australia's agricultural sector's impressive productivity performance over five decades and needs to continue to be so. Biosecurity needs to be a key research priority, particularly given the increasing risk profile and the high cost of the consequences of a threat incursion. Key priorities to improve capacity should include preparedness and prevention activities (risk mitigation), surveillance, diagnostics and response. Australia also needs to maintain an R&D sector which is able to inform the science based, precautionary approach to quarantine, and the development and, in particular, implementation of threat-specific contingency plans. The impact of climate change on biosecurity risk profiles needs to be a particular priority of emerging climate change agricultural R&D programs.

Federal and State agencies need to have strong linkages back to agricultural researchers and industry. This is particularly so in improving the links between proposals for action and consideration of economic consequences, particularly on-farm. Agency processes should require consideration of reports developed in consultation with industry on economic consequences of action and consideration of alternatives to improve decision making. Access to relevant technical advice and staff is also essential.

8. Review

An important objective of Australia's quarantine and biosecurity system must be to continually learn from experiences and to share these both within and across other parts of the continuum. Reviews need to be adequately resourced and include consultation with stakeholders to ensure lessons learnt lead to improved operational outcomes.

QFF was disappointed that the issue of interstate trade was largely excluded from the remit of the Review. The barriers to trade on alleged 'biosecurity' grounds, particularly by Western Australia, are substantial and add considerably to the cost of business. QFF particularly draws the Review's attention to comments in the NGIA and Growcom submissions in this regard. One of the difficulties with interstate trade is the lack of an arbiter as to what is fair or unfair, similar to the WTO at an international level. QFF would urge the Review to consider the establishment under COAG of a high powered Ministerial Council to set broad rules for interstate import risk assessments and protocols and allow industry and States to lodge complaints with such a body.