



3 July 2015

Established Pests and Diseases Discussion Paper  
National Biosecurity Committee Secretariat  
Department of Agriculture  
GPO Box 858  
Canberra ACT 2601

Dear Committee members,

**DISCUSSION PAPER: MODERNISING AUSTRALIA'S APPROACH TO MANAGING  
ESTABLISHED PESTS AND DISEASES OF NATIONAL SIGNIFICANCE**

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Please find attached a submission from Wildlife Health Australia (WHA) regarding the Committee's discussion paper "Modernising Australia's approach to managing established pests and diseases of national significance". We have addressed the specific questions in the order in which they are posed.

Though we understand the approach, there are risks primarily in the areas of public good for which no potential industry other funding mechanism is immediately apparent. There are, however, opportunities to quickly and easily build upon existing structures to address some of these gap areas. A great deal could be achieved by utilising the currently available structures to introduce a more targeted approach to surveillance for wildlife diseases of potential national significance.

We are happy to discuss this submission with you face to face should you feel it would assist the Committee. We hope that our submission helps you with this important work.

Best Wishes,

Rupert Woods PhD  
CEO, WHA

# WILDLIFE HEALTH AUSTRALIA (WHA) SUBMISSION: DISCUSSION PAPER: MODERNISING AUSTRALIA'S APPROACH TO MANAGING ESTABLISHED PESTS AND DISEASES OF NATIONAL SIGNIFICANCE

## CONSULTATION QUESTIONS

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In relation to the management of established pests and diseases of national significance:

### **1 Are the proposed Policy Principles appropriate and practical?**

Yes.

### **2 Are the proposed Policy Principles sufficient?**

The proposed policy principles are very good. However, the second last principle could be strengthened:

- where there is a national interest to intervene, established pests and diseases assessed as being nationally significant will have an associated national management plan or strategy

An additional policy principle should be that the Commonwealth provides leadership and funding for initiation and initial implementation of the plan or strategy.

No matter how good a national management plan or strategy is, without a commitment to fund the initial implementation and long term coordination there will not be the sustained direction and focus required to manage the problem on a whole of nation scale. The Commonwealth has a leadership role to play in identifying and providing the sustained direction and focus required for these national problems. A good example of a current policy failure that uses an approach similar to that suggested in the current document is that of threatened species management and threat abatement plans developed for the listed key threatening processes. The policy is to develop a plan, but there is no requirement to implement the plan. Even when these plans are implemented, a lack of accountability, coordination and clear responsibility often leads to inefficiencies and confusion. In most cases, however, without funding there is no action.

### **3 Should listing of established pests and diseases of national significance be for a defined period, or open-ended?**

A defined period. Review each ten years.

### **4 What form of review should be required to maintain the listing of a pest or disease as an established pest or disease of national significance?**

Expert elicitation with the four sectoral committees (Invasive Plants and Animals Committee, the Plant Health Committee, the Animal Health Committee and the Marine Pest Sectoral Committee) followed by invited comment from the Australian Government Departments of Agriculture, Environment and Health and Animal Health Australia, Plant Health Australia and Wildlife Health Australia i.e. scoping of the key partners in any management effort: states and territories, Commonwealth and the organisations set up to manage the key stakeholder groups. Once the lists are agreed then they go to the public and others for comment.

Though development of a prioritisation process is important, we would argue that a vast amount of time, money and resources could be ploughed into these processes, which is money and resources we simply do not currently have. We would suggest being pragmatic and adopting the suggested

approach to begin with: this itself will be challenging enough. The underpinning science can be worked through in parallel and an iterative approach to refining the priorities adopted. Unless a pragmatic approach is adopted there is the risk that no decisions will be made. The key to agreement is in seeking input from the impacted and responsible stakeholders and agencies: consult, but not too widely. Quantitative comparative benefit-cost and investment priorities can be tackled through CEBRA, ANU, ABARES and others.

The findings of the Agricultural Competitiveness White Paper present a small window of opportunity. This should not be lost through endless consultation and prioritisation.

#### **5 What is an appropriate time period for such a review?**

Each ten years. Five years is too short a period; fifteen years too long.

#### **6 Are the proposed roles and responsibilities clear, particularly in relation to your role?**

The proposed roles and responsibilities are well articulated with the exception of that of the Australian government. The responsibility of the Australian government through NBC to initiate and provide leadership is mentioned. However, there is no detail on the enabling mechanism and the roles of the main Australian government departments with carriage of the issues (Biosecurity and Environment). The role of these departments and how they interact in progressing the work need to be agreed and clearly understood.

As a stakeholder, the role of our organisation, Wildlife Health Australia, can be inferred. We make some specific suggestions that could help the Committee below.

#### **7 Are the proposed roles and responsibilities appropriate and practical?**

With the exception of the leadership role of the Commonwealth "Yes", however the space we work in, wildlife, is largely a public good. This makes investment in the necessary sustained national coordination and framework building required for problem solving problematic. The important problems require sustained direction and focus to manage. Many are on going. Without a sustainable coordination and enabling mechanism there can be no long term planning implementation and problem management.

The role of the Commonwealth in initiation and leadership is easily said. However, this cannot occur without an appropriate level of resourcing for the enabling agencies. The Biosecurity and Environment agencies do a very good job with very limited resources. Without a significant injection of funds to these agencies the approach is fundamentally flawed: someone needs to have oversight and they need the resources to do so. Though the intention is good, there are significant risks associated with Australian governments losing control of the process.

#### **What are the issues with establishing and maintaining effective collective action?**

A key consideration in the wildlife space is the lack of industries that can fund public goods.

The challenges of working in a federated system and on issues that cross jurisdictional boundaries are highlighted. Central coordination and communication are critical to success and sustainability as is engaging the states and Industry in meaningful ways.

#### **8 How can the coordinated approach be best implemented across the various stakeholder groups?**

Utilising existing structures, complementarity rather than redundancy or competition, and the need to engage the states, territories and Industry in meaningful ways are important for implementation.

Investment in and long-term commitment to coordination is required. In the environment space, a simple model could be the “Centre for Invasive Species Solutions”, which is being proposed as a necessary way forward by the Invasive Animal and Plant CRCs. A government-industry partnership approach, the Centre would act as a “One stop shop” for coordination and prioritisation of issues and actions relating to invasive species and their management. Activities of any proposed Centre should include consideration of disease, surveillance and preparedness. For this model to work, however, good governance would be critical. There are a number of models that could be adopted.

#### **9 How do you see yourself (or your interest/industry/organisation) contributing?**

Wildlife Health Australia is here to work in the national interest. WHA could assist in the area of surveillance and stakeholder management. WHA could also assist NBC and the states and territories in establishing and maintaining a list of pests and diseases of national significance relevant to wildlife. The current process used by WHA to prioritise diseases reported to the national wildlife health information system and some discussion is provided as Attachment A.

#### **Other comments.**

It is interesting that surveillance is not mentioned in the discussion paper. Surveillance, the collection of data and risk assessment for disease agents introduced and/or endemic to Australia is important to better assist in identifying, assessing and mitigate biosecurity risks. The better our preparedness and knowledge of the risk and distribution of such agents the better Australia can be placed to manage environmental impacts and also the flow-on effects into other areas such as agriculture and human health.

Support for framework building and the inclusion of diseases that may impact upon environment into Australia’s general wildlife health surveillance system is required.

Australia has a very good general wildlife health surveillance system. The system relies upon a small contribution from the Australian government that is significantly levered to take advantage of a large amount of goodwill and in-kind support from stakeholders. There are opportunities to quickly and easily build upon existing structures. A great deal could be achieved with a relatively small amount of seed money by utilising the currently available structures to introduce a more targeted approach to surveillance for wildlife diseases of national significance. The challenge will be in ensuring sustainability in a largely public good area where the main stakeholders are the taxpayers, a broad and nebulous group.

Though a simple and logical next step in the development of Australia’s biosecurity system, it also needs to be remembered that the wildlife component is in a precarious situation for carrying out this work given its short-term funding arrangements.

## ATTACHMENT A: CURRENT CONSIDERATIONS USED BY WHA TO PRIORITISE ADVICE TO THE STATES AND TERRITORIES FOR REPORTING OF WILDLIFE DISEASES AND A POSSIBLE WAY FORWARD

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### Current situation

We do not currently have an Australian priority list of wildlife diseases. A composite of lists and considerations are currently used by WHA to determine priorities in terms of wildlife disease reporting and surveillance. There would be the potential to have wildlife diseases prioritised into diseases of 1) Livestock concern, 2) Public Health concern, 3) Environmental concern and 4) a combined category.

WHA would consider any disease (animal and aquatic diseases) listed as notifiable by

- 1 the OIE, including the non-listed wildlife diseases
- 2 Australia
- 3 Australian states or territories
- 4 plus diseases listed by DoE as a Key Threatening Process (e.g. Chytrid and Beak and Feather Disease).<sup>1</sup>

for reporting and have outlined these lists into a document entitled "Criteria for events to enter into eWHIS" (eWHIS - the national wildlife disease surveillance database). The relevant extracts can be provided. There are also guidelines for "significant" events to ensure "new or emerging" diseases are captured, as captured in the AHC policy (which provides very useful criteria for prioritising diseases of potential national concern). Although all important diseases with wildlife as part of their ecology that could impact upon Australia's trade, human health and/or biodiversity should be captured under the above lists and categories, there are some diseases or syndromes that are not contained in the aforementioned lists. WHA presents fact sheets on a number of these diseases, which it considers to be of importance to Australia.

The other list which WHA find is a useful reference (but is very long and includes both exotic and endemic diseases) is the disease list under Schedule 3 – Quarantinable animal diseases of the Quarantine Proclamation 1998 ([https://www.comlaw.gov.au/Details/F2015C00124/Html/Volume\\_1](https://www.comlaw.gov.au/Details/F2015C00124/Html/Volume_1)).

In addition, the Department listed *P. destructans* (which causes white nosed syndrome in bats) as one of six invasive species of high concern that are considered as threats to Australia's environment: Answers to questions taken on notice (public hearing, 31 October 2014, Canberra) [http://www.aph.gov.au/Parliamentary\\_Business/Committees/Senate/Environment\\_and\\_Communications/biosecurity/Additional\\_Documents](http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/biosecurity/Additional_Documents).

An interim list of the top 20 high risk pathogens and invertebrates was developed by the Bureau of Rural Sciences in 2009 for the discontinued Environmental Biosecurity Committee (Raphel *et al.* 2009). A list of important diseases of feral animals has been produced by Henderson (2008).

### Possible way forward

Prioritisation has essentially already be performed for production animals. The national list of notifiable diseases contains 95 diseases (<http://www.agriculture.gov.au/pests-diseases->

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<sup>1</sup> We currently call these "Small "n" notifiable".

[weeds/animal/notifiable](#)). Of these, 60 are listed under the EADRA and within the EADRA, they are listed into categories 1-4. In addition to the categories within the EADRA, the government and industries have assigned a priority to the diseases by the decision as to whether the disease has a disease strategy manual under AUSVETPLAN. This provides a clear path to establishing which diseases are of significance and what level of significance. A similar approach could be taken for wildlife diseases through a process of ascertaining whether the host is listed under the EPBC Act and at what level. The non-notifiable OIE Wildlife Disease list could also be considered. Potential gap areas would need to be identified, specifically around currently non-listed diseases that could impact upon biodiversity. A simple table could be built and might include diseases such as:

Disease/Agent	Host/ Reservoir	Rational	Stakeholders
<b>Livestock Concern</b>			
Avian influenza and avian paramyxoviruses	Wild birds	Spillover to poultry	Industry
<b>Public Health Concern</b>			
Australian bat lyssavirus and Hendra virus	Bats	Important zoonoses	Health
Psittacosis	Parrots	Zoonosis	Health
<b>Environment Concern</b>			
Chlamydiosis and KoRV	Koalas	Most significant diseases of most iconic species	Public
Chytridiomycosis	Amphibians	Extinction of native frogs	Public
Mucor mycosis	Platypus	Most significant diseases of iconic species	Public
Psittacine beak and feather disease	Parrots	Key Threatening Process	Public
<b>Combined Concerns</b>			
Echinococcosis/ Hydatidosis	Macropods and wild dogs	Important zoonosis	Health/ Industry

Gaps could be identified. Wildlife Health Australia could help by further refining this list and then assist in providing the framework and coordination required to better targeted surveillance activities for any diseases identified by NBC to be of national concern and for which wildlife are involved in their epidemiology.

In terms of established pests, it would be more difficult but could be based on impact and whether the species impacted are listed under the EPBC Act.

## THE IMPORTANCE OF WILDLIFE HEALTH TO AUSTRALIA'S FUTURE BIOSECURITY

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Diseases and disease agents of feral animals and wildlife pose a threat to Australia's environment and future biosecurity:

- Wildlife are hosts and/or reservoirs for important diseases and disease agents that can affect the environment and biodiversity. Some of these diseases can lead to extinction (e.g. the introduction of chytridiomycosis in frogs in Australia) or severely impact upon populations (e.g. white-nose syndrome in bats in America which has not yet reached Australia).
- Other wildlife diseases, which have already been introduced into Australia still have unknown impacts e.g. psittacine herpesvirus 1 introduced with legally traded green-winged macaws and pigeon paramyxovirus, which was believed to have been introduced through smuggling.
- Wildlife are also hosts and/or reservoirs for important exotic diseases and disease agents that can affect trade and market access (e.g. another exotic disease, tuberculosis which is present in possums in New Zealand) and detection of disease and disease agents in wildlife, and the lack of evidence of absence to satisfy trading partners, can impact upon trade and market access.
- Furthermore, Australian wildlife are susceptible to many of the important exotic emergency diseases of production animals and, if introduced and established, spillover to humans and food animals can occur (e.g. most other exotic diseases of concern to us including foot and mouth disease, classical swine fever, Nipah virus, Surra etc).
- Wildlife are also the most common source of emerging novel diseases and these diseases can impact upon environment, people and food animals (Jones et al 2008, McFarlane et al 2012).
- While incursions and exotics are recognised as risks (for example chytridiomycosis, which has caused the extinction of six Australian frog species), it is also important for the Committee to remember that another risk on a national scale...supported by the outbreaks of emergency animal diseases in the last 30 years, is the emergence of diseases from within Australia (for example Tasmanian Devil facial tumour disease, avian influenza, Hendra virus, Australian bat Lyssavirus, Tularaemia, Leishmania etc.). However, the necessary frameworks for management of these two disease pathways **support one another**: a focus on surveillance and detection in endemics assists in identification of incursions by exotics and vice-versa.

In assessing and developing strategies to manage endemic diseases of national significance with wildlife as part of their ecology that may impact on Australia's environment, these facts, including hosting of exotic diseases, spillovers and flow-on effects need to be considered.

The risks will become greater with changing land use, climate change, animal movements and as societal attitudes bring wildlife, livestock and people into closer contact.

## ABOUT WILDLIFE HEALTH AUSTRALIA

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Wildlife Health Australia (WHA) is the peak body for wildlife health in Australia and operates nationally. The head office is located in Sydney, NSW.

WHA activities focus on the increasing risk of emergency and emerging diseases that can spill over from wild animals and impact on Australia's trade, human health, biodiversity and tourism. We provide a framework that allows Australia to better identify, assess, articulate and manage these risks. We provide the framework for Australia's general wildlife health surveillance system.

Our mission is to develop strong partnerships in order to better manage the adverse effects of wildlife diseases on Australia's animal health industries, human health, biodiversity, trade and tourism.

WHA directly supports the Animal Health Committee (AHC), Animal Health Australia (AHA), the Animal Health Policy Branch and the Office of the Chief Veterinary Officer (OCVO) within the Australian Government Department of Agriculture (DoA) and Australian governments in their efforts to better prepare and protect Australia against the adverse effects of wildlife diseases. It provides priorities in wildlife disease work, administers Australia's general wildlife disease surveillance system as well as facilitating and coordinating targeted projects. Wildlife health intelligence collected through the National Wildlife Health Information System (eWHIS: <http://www.wildlifehealthaustralia.com.au>) administered by WHA is provided to members of AHC and the Australian Government DoA, and Departments of Health (DoH) and Environment (DoE), on issues of potential national interest, potential emerging issues and significant disease outbreaks in wildlife. The information is provided in line with the agreed policy for data security.

WHA is administered under organisational governance principles. A management group, chaired by an appointment from DoA provides strategic direction and advice to a small team, which oversees the running of WHA. It is important to note that WHA involves almost every agency or organisation (both government and NGO) that has a stake or interest in animal and wildlife health issues in Australia. In addition WHA also comprises more than 600 wildlife health professionals and others from around Australia and the rest of the world who have an interest in diseases with feral animals or wildlife as part of their ecology that may impact on Australia's trade, human health and biodiversity.

More information on WHA is available at: <http://www.wildlifehealthaustralia.com.au>.

## RELEVANT TECHNICAL INFORMATION SUPPORTING OUR COMMENTS

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Henderson, WR (2008) Workshop Proceedings — Review of wildlife exotic disease preparedness in Australia. 2-3 April 2008, Canberra. Invasive Animals Cooperative Research Centre, Canberra.

Jones KE, NG Patel, MA Levy, A Storeygard, D Balk, JL Gittleman, P Daszak (2008) Global trends in emerging infectious diseases. *Nature* 451:990-995.

McFarlane R, A Sleigh and T McMichael (2012) Synanthropy of wild mammals as a determinant of emerging infectious diseases in the Asian–Australasian region. *EcoHealth* 9(1):24-35.

Raphael, B, J Lizzio, J Wright, L Richmond, J Baker (2009) Establishing a list of nationally significant environmental invasive pathogens and invertebrates. Appendix 5. Bureau of Rural Sciences. Client Report. Canberra, Australia.