



12 July 2019

NEBRA Custodian
Australian Government Department of Agriculture

Dear Sir or Madam,

WILDLIFE HEALTH AUSTRALIA (WHA) SUBMISSION: REVISED NATIONAL BIOSECURITY ENVIRONMENTAL RESPONSE AGREEMENT (NEBRA)

Please find attached a submission on the draft revised NEBRA and NBC's approach to each of the NEBRA review recommendations. We have structured our submission to provide feedback on the NBC recommendations as well as a brief summary regarding next steps and operationalising the agreement. We also provide background information on Wildlife Health Australia (WHA).

NEBRA makes an important contribution to Australia's biosecurity arrangements and NBC and the writing group should be congratulated. Managing the exceptions is, however, always the most difficult part of the development of these sorts of documents. The main gap area for us is around new and emerging diseases, most of which come from wildlife. For many (most) of these diseases an aetiology cannot readily be identified, the feasibility of eradication is uncertain, benefit-cost cannot be determined, or risk assessment is protracted or not possible. Though the suggestions of NBC improve and clarify the arrangements, for the majority of wildlife disease events it is still doubtful that the NEBRA will be able to be activated. My understanding is that these events will therefore need to be dealt with under local arrangements.

A potential approach may be to focus on how NEBRA can be operationalised and implemented in the context of the new IGAB and state and territory arrangements, including clarification as to what, exactly, constitute normal commitments for wildlife and how these types of scenarios will be managed and potentially escalated. This, along with the proposed development of alternative cost-shared models for containment, should be a high priority for the new Custodian and, though not optimal, may offer a temporary work around until the way forward becomes clearer.

Thank you for the opportunity to comment, and good luck with this important work.

Rupert Woods
CEO, WHA

WILDLIFE HEALTH AUSTRALIA (WHA) SUBMISSION: REVISED NATIONAL BIOSECURITY ENVIRONMENTAL RESPONSE AGREEMENT (NEBRA)

SUMMARY OF KEY COMMENTS AND SUGGESTIONS

- This next version is much improved on the initial release, and NEBRA makes a significant contribution to Australia’s biosecurity arrangements: NBC and the writing group should be congratulated.
- However, it is still doubtful that the NEBRA will ever be able to be activated for wildlife disease events where an aetiology cannot be identified, the feasibility of eradication is uncertain, benefit-cost cannot be determined, or risk assessment is protracted or not possible.
- One potential solution may be to now focus on how NEBRA will be operationalised and implemented in the context of the new IGAB and state and territory arrangements, including clarification as to what, exactly, constitute normal commitments and how these types of scenarios will be managed including:
 - a. How non-government entities can best be engaged with and utilised to assist
 - b. How wider networks can be utilized to support preparedness and subsequent response
 - c. A focus on development of benefit-cost analysis and rapid risk assessment for listed and endangered species.
- As we have suggested in our previous submissions, a number of small, scenario-based desk-top exercises could be identified and run by the Custodian to assist.
- We note NBCs’ recognition of the challenges of including containment under the NEBRA and their recommendations regarding its inclusion (16). Though the recommendation is that this is out of scope for NEBRA, NEBRA as it stands will not serve the needs of the majority of the wildlife disease scenarios where a lack of effective tools and tactics mean that containment may be the only publicly palatable option e.g. for endangered or listed species.

NBC’s suggestion that “a different mechanism could be developed to facilitate cost sharing arrangements where eradication is not possible, but there are joint benefits to ensuring containment” is a good one and this area should also be included in consideration for the work plan for the Custodian. It will, however, require additional resourcing to develop the models and recommendation. This has to be a high priority. Until this is addressed, the reality is that despite very good progress with these national arrangements, the majority of nationally significant wildlife disease events will need to be managed based on local arrangements and the enthusiasm of the jurisdiction involved.

COMMENTS ON THE NBC RESPONSE TO THE NEBRA FIVE YEAR REVIEW RECOMMENDATIONS

1) Recommendation 1.

Agree. Harmonization is desirable, however, the use of 'non-government entities' better describes the system participants.

2) Recommendation 2.

Agree. However, it will be important that the Commonwealth Department of Agriculture and Water Resources (DAWR) and government partners retain responsibility and oversight.

3) Recommendation 3.

Agree.

4) Recommendation 4.

Agree.

5) Recommendation 5.

Agree. Enhancement of the NEBRA custodian role to support a maturing NEBRA is important. Specifically, the proposed focus on greater public transparency around decision making, greater support for the development of interpretative guides, enhanced communication with non-government stakeholders and general co-ordination of stakeholder activity.

Some areas that could be considered for clarification by the new custodian include:

- Reporting, notification and engagement of non-government entities and the public - There are very real benefits to engaging the public very early in any response and keeping them and the stakeholders informed and engaged as the response progresses. The current NEBRA and revision are not clear around transparency and early notification to affected stakeholders and attention from the custodian is indicated. Harmonization is desirable and arrangements around reporting, notification and engagement of stakeholders (non-government entities) in the Plant and Animal Deeds could be used as models. Clarification will need to include the timeliness of advice and reporting, which should be encouraged.
- Involvement of non-government entities and external expertise – Access to external expertise and activation of non-government entities can be enormously useful, and in fact has proven to be mission critical, for a good response. A good process is required to identify and guide who should get involved, how and when. How do we involve external parties and when do the externals come in?
- Involvement of non-government entities as part of preparedness outside response also needs to be examined for the Environment space. There are large numbers of non-government networks that could be utilized to assist, for example as part of training and maintenance of response readiness for the community.
- Benefit-cost analysis (see 15 – below) and approach to containment outside of the deed (see 16 – below).

6) Recommendation 6.

Agree. Should cost-sharing with non-government beneficiaries occur in future then these arrangements can be reviewed.

7) Recommendation 7.

No comment.

8) Recommendation 8.

Agree.

9) Recommendation 9.

Agree.

10) Recommendation 10.

Agree.

11) Recommendation 11.

Agree.

12) Recommendation 12.

Agree. This is a significant improvement to the arrangements and NBC need to be congratulated on their approach.

13) Recommendation 13.

Agree.

14) Recommendation 14.

Agree.

15) Recommendation 15.

Agree. The retention of qualitative benefit-cost analysis (BCA) is important. An important area of focus in future will be in BCA for the environment space and linking the current work underway in the environment space to the biosecurity and response space. A key question is "How do you put a value on endangered species?" or "the impact of moving a species from non-listed to listed?" For wildlife, disease can have a very rapid impact on small populations and rapid risk assessment and BCA will be vital to ensure that the information required to activate NEBRA is quickly available to decision-makers. A large amount of work has and is being done on BCA for environment and endangered and threatened species. Strengthening guidance around BCA within NEBRA offers an additional driver and the added benefit of improving ties to the groups involved in BCA for environment many of whom may not necessarily work directly with the biosecurity space.

16) Recommendation 16.

This is a very difficult area. We do not work directly in the response area but our understanding is that there is some ability for the plant and animal deeds to be activated to allow for containment as part of the response, but not as an outcome. NEBRA needs to be harmonized with these other deeds and is attempting to do so. However, our view remains, and we agree

with NBC, that it is extremely important that Australia has “a different mechanism [that] could be developed to facilitate cost sharing arrangements where eradication is not possible, but there are joint benefits to ensuring containment”. This is particularly important for some wildlife diseases and will be the norm for those impacting upon endangered and or listed species. Though the recommendation is that containment is out of scope for NEBRA, NEBRA as it stands simply will not serve the needs of the majority of these wildlife disease events and development of some other mechanism must be a very high priority for the country going forward. There are a number of different models. We suggest that this area should also be included in consideration for the work plan for the Custodian. It will, however, require additional resourcing to develop the models and recommendation. Until this is addressed, the reality is that despite national arrangements, the majority of nationally significant wildlife diseases will need to be managed based on local arrangements and the enthusiasm of the jurisdiction involved.

ABOUT WILDLIFE HEALTH AUSTRALIA

Wildlife Health Australia (WHA) is the coordinating 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) and Chief Environmental Biosecurity Officer (CEBO) within the Australian Government Department of Agriculture and Water Resources (DAWR) and Australian governments in their efforts to better prepare and protect Australia against the adverse effects of wildlife diseases. WHA 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 DAWR, and Departments of Health (DoH) and Environment and Energy (DEE), 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 supports the NAHIS by provision of quarterly reporting and the ACVO by hosting the OIE Wildlife Health Focal Point.

WHA is administered under good organisational governance principles. An elected management group, chaired by an appointment from DAWR, and including an AHC representative 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. There are more than 40 member organisations and 800 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>.