

18 June 2026

National Biosecurity Reform
Australian Government Department of Agriculture, Fisheries and Forestry

Dear Sir or Madam,

WILDLIFE HEALTH AUSTRALIA SUBMISSION: National Biosecurity Reform

Wildlife Health Australia welcomes the opportunity to provide input to the reform of Australia's biosecurity system. Australia has a strong foundation in biosecurity through the National Biosecurity Strategy and existing cross-sector partnerships and established national systems. Reform should build on this progress while addressing emerging challenges in scale, complexity and integration with stronger recognition of prevention, One Health, wildlife and environmental health and fit-for-purpose arrangements.

Key Points:

- Wildlife health is a critical component of national biosecurity and should be more consistently reflected across reform design and implementation
- Effective and future-ready biosecurity requires a One Health approach, recognising the interdependence of human, animal (domestic and wildlife) and environmental health, and supporting more coordinated policy and operational outcomes
- Prevention should be more strongly reflected in the reform agenda
- Data sharing reforms provide an opportunity to strengthen national surveillance through integrated, cross-sector systems, strengthening inclusion of wildlife and environmental health
- Expanded response arrangements should address non-eradication scenarios, including wildlife disease events, supported by impact management approaches
- Reform should build on existing systems, partnerships and demonstrated strengths—including the National Biosecurity Strategy, national surveillance systems and recent cross-sector response models—while avoiding duplication
- Partnerships—including First Nations peoples, wildlife rehabilitators, environmental experts, frontline veterinarians and human health and environment agencies and organisations—are critical to system capability and should be supported through reform.

We would welcome the opportunity to discuss our submission further if that would assist the review.

Thank you for the opportunity to comment and for progressing this important work.

Yours sincerely,

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ABOUT WILDLIFE HEALTH AUSTRALIA

Wildlife Health Australia (WHA) is a national body that advances wildlife health for a healthier future for all. WHA works through trusted partnerships across Australia and beyond, bringing together experts, governments and communities to understand and respond to wildlife health issues.

WHA coordinates national wildlife health systems and networks, integrating intelligence and expertise from over 120 government and non-government partners across environment, health and agriculture sectors. We provide expert advice and credible data to support prevention, preparedness and response strategies for wildlife health threats, aligned with Australia's federated system.

We provide advice on national and international wildlife health issues, informing policies, programs and strategies to integrate wildlife objectives and implement One Health solutions. WHA contributes expertise, experience and foresight contribute to advancing wildlife health both in Australia and globally.

We are strongly committed to listening to and elevating Indigenous voices in our work and at all levels of the wildlife health system.

WHA administers the National Wildlife Health Information System (eWHIS), which enables intelligence reports to be provided to members of the Animal Health Committee, the Australian Government Department of Agriculture, Fisheries and Forestry, the Department of Climate Change, Energy, the Environment and Water, the Department of Health, Disability and Ageing, and other government agencies such as the Australian Pesticides and Veterinary Medicines Authority (APVMA), 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 also supports the National Animal Health Information System (NAHIS) and Australia's Chief Veterinary Officer by hosting the World Organisation for Animal Health (WOAH) Focal Point for Wildlife.

WHA contributes to global wildlife health strategy, policy and discussions in forums such as the WOAHS Working Group on Wildlife, the International Union for the Conservation of Nature (IUCN) Species Survival Commission Wildlife Health Specialist Group (currently co-chair) and Conservation Planning Specialist Group and the Convention of Migratory Species Working Group on Migratory Species and Health. In 2023, WHA became a WOAHS Collaborating Centre for Wildlife Health Risk Management and currently co-chairs the WOAHS Global Wildlife Health Collaborating Centre Network (WOAH-WILDNet).

More information is available at: <https://wildlifehealthaustralia.com.au>

Wildlife Health Australia (WHA) Submission Paper

Part 1 - Overall Reform Priorities and Sequencing

The proposed reform themes broadly address system risks but do not sufficiently reflect prevention, wildlife health or environmental dimensions. Prevention is internationally recognised as fundamental to effective biosecurity, yet the current reform focus is weighted toward preparedness and response, with less emphasis on upstream risk reduction.

Alignment between reform themes and strategic risks is generally strong. However, alignment is less clear for social license and global factors, which would benefit from stronger emphasis on shared responsibility, biosecurity culture and partnerships, consistent with the National Biosecurity Strategy and a One Health approach.

Strengthening integration across human, animal (domestic and wildlife) and environmental health across all theme areas would support more coordinated and effective system outcomes.

Priority sequencing of reforms:

- Preparedness, including prevention and early detection (such as pre-border measures)
- Legislation and regulation building a shared understanding of risks and enabling integrated, cross-sector decision-making
- Sustainable funding aligned to national priorities, enabling cross-sector investment
- Response and recovery
- Operational and workforce capability and capacity uplift to align to opportunities and gaps exposed through other reform activities.

Opportunities to leverage partnerships are significant. Existing models demonstrate the value of coordinated, cross-sector collaboration, including through national taskforces, shared surveillance systems and joint response arrangements. Wildlife Health Australia provides a practical example of this approach, coordinating national wildlife health systems and networks for over 20 years. Through partnerships with over 120 government and non-government organisations across environment, health and agriculture sectors, WHA supports integrated surveillance, data sharing and expert advice to inform prevention, preparedness and response. This established capability demonstrates how strengthening and scaling existing partnerships can support more coordinated, efficient and effective biosecurity outcomes.

Part 2 – Themes

Preparedness

Preparedness reforms should prioritise integrated risk assessment and data sharing across wildlife, domestic animals, environment and human health domains. A One Health, all-hazards approach—grounded in a shared understanding of risk and supported by cross-sector agility—is critical.

Scenario-based exercises, including wildlife disease scenarios, provide an effective mechanism to test system readiness, identify gaps in existing arrangements (including between EADRA and NEBRA), and inform practical improvements to coordination, legislation and response capability, as demonstrated by Exercise Volare¹.

Strengthening national surveillance and data sharing is a priority. Wildlife health is both an indicator of ecosystem health and a critical component of national biosecurity. As biodiversity and natural systems come under increasing pressure from climate change, land-use change and growing interactions between wildlife,

¹ <https://www.agriculture.gov.au/biosecurity-trade/policy/emergency/exercises/volare>

domestic animals and people, integrated surveillance systems will become increasingly important to support prevention, early detection and risk management. Emerging infectious diseases further highlight the importance of understanding and managing risks at the human–animal–environment interface.

Australia’s national wildlife health surveillance system is a key component of biosecurity intelligence and should be integrated into national surveillance and data-sharing reforms. Wildlife-specific gaps include limited baseline wildlife health information, barriers to diagnostic laboratory testing, and funding constraints. More broadly, surveillance and data-sharing reforms must address fragmented cross-sector data systems, inconsistent terminology and data standards, privacy and data ownership considerations, and the practical challenges associated with modifying established systems. Together, these factors constrain early detection, risk assessment and understanding of emerging biosecurity threats.

Preparedness would be strengthened through:

- A national biosecurity threat assessment incorporating wildlife and environmental risks within a One Health, all-hazards and horizon-scanning framework
- Integrated, cross-sector surveillance and data sharing systems, inclusive of wildlife, domestic animals, environment and human health, drawing on recent work from the Australian Centre for Disease Control on a One Health Surveillance System
- Continued investment in existing national systems as part of coordinated surveillance uplift
- Regular national exercises, including wildlife scenarios, to test readiness and identify system gaps
- Recognition and integration of key knowledge, intelligence and data contributors, including First Nations peoples, environmental experts, wildlife rehabilitators and frontline veterinarians, supporting meaningful collaboration as outlined in the [2024 Intergovernmental Agreement on Biosecurity Review](#).

Response

Australia’s biosecurity response framework is strong and internationally recognised. While the proposed reforms support a more coordinated and evidence-driven system, they should also recognise the need to address gaps in arrangements where eradication is not feasible, particularly for wildlife disease events.

Current arrangements, including National Environmental Biosecurity Response Agreement, are not well suited to many wildlife disease scenarios, which are often characterised by uncertainty, including unknown aetiology and unclear feasibility of eradication. This limits activation of existing mechanisms and creates gaps in managing nationally significant incidents where eradication or containment is unlikely.

Recent experience via the development of the National Management Agreement – H5 HPAI in Wildlife (H5 NMA)² demonstrates the value of fit-for-purpose, cross-sector arrangements to address these gaps. There is an opportunity to extend this approach beyond single-disease models to support more consistent response mechanisms, including for wildlife disease events.

Effective response depends on established cross-sector coordination. Embedding a One Health approach as standard—rather than crisis-specific—will strengthen integration across human, animal (domestic and wildlife) and environmental health. Strengthening response arrangements also requires greater inclusion of wildlife and environmental expertise, meaningful engagement of First Nations peoples in governance and decision-making, and improved transparency and resourcing.

² <https://www.agriculture.gov.au/biosecurity-trade/policy/emergency/h5-hpai-nma>

Response arrangement reforms should also explicitly consider social licence, recognising the role of community trust and transparent decision-making in enabling effective response and implementation^{3,4}.

Response arrangements would be strengthened through:

- Embedding One Health coordination across response frameworks
- Expanding fit-for-purpose arrangements for non-eradication scenarios, including wildlife disease events
- Incorporating containment and impact management pathways
- Strengthening cross-sector partnerships and governance arrangements prior to incursions
- Improving data integration and use of technology to support real-time decision-making.

Recovery

The proposed recovery reforms are a positive step toward improving national coordination and consistency, including through development of a biosecurity recovery framework aligned with broader disaster recovery settings. There is an opportunity to build on these reforms by more explicitly recognising environmental, wildlife and community recovery outcomes.

Experience from large-scale events in Australia, including floods, bushfires and marine oil spills, highlights the importance of coordinated approaches that address ecological recovery alongside social and economic impacts. While existing arrangements provide a strong foundation, gaps remain in addressing the specific impacts of biosecurity incidents on biodiversity, ecosystems and affected communities.

A more integrated approach—consistent with a One Health framework—would support improved recovery outcomes across environmental, social and economic dimensions.

Recovery reform arrangements would be strengthened through:

- Alignment with other recovery arrangements, such as the Disaster Recovery Funding Arrangements
- Inclusion of wildlife, ecosystem and community recovery objectives within recovery planning and implementation
- Leveraging existing recovery programs and mechanisms, avoiding the creation of parallel systems.

Workforce Capability

Current pressures on the veterinary and biosecurity workforce present a significant constraint, including demonstrated shortages at state and national levels. Reform should build on existing workforce assessments and initiatives to avoid duplication and target investment where it will have the greatest impact.

Specifically, gaps remain in wildlife health expertise, surveillance capability and cross-sector training.

Veterinary clinics and wildlife care networks represent an underutilised surveillance asset. Strengthening the capacity of general practice veterinary clinics to triage and manage wildlife cases would support earlier detection of emerging diseases. Barriers include limited time, skills and access to expertise, funding constraints and limited diagnostic support.

Workforce capability would be strengthened through:

- Further building capability in wildlife health disciplines, including epidemiology, ecology and surveillance
- Developing cross-sector training pathways to support delivery of a One Health approach

³ Travers et al (2024). Gauging public sentiments toward foot-and-mouth disease outbreak control: A scoping review 2003–2022. CABI One Health, 3(1).

⁴ Australian Government Department of Agriculture, Water and the Environment, [Wildlife Care in Australia Report](#) (Canberra: 2021).

- Supporting frontline contributors, including veterinarians, wildlife rehabilitators and indigenous rangers
- Strengthening workforce sustainability and collaboration, including through existing workforce initiatives.

Operational Capability

Operational capability depends on effective coordination of systems, data and partnerships. Reform should focus on integration rather than expansion per se, linking existing systems and drawing on current investments in research, data and workforce capability (see above).

Data sharing remains a key constraint. Differences in standards, systems and formats, combined with privacy and ownership considerations, limit interoperability and timely use of information. In some cases, trusted information-sharing mechanisms may complement formal system integration. These approaches should build on existing work, including recent efforts by the Australian Centre for Disease Control to develop a One Health surveillance system.

Operational capability would be strengthened through:

- Improving interoperability of data systems and addressing legislative and technical barriers to data sharing
- Leveraging existing workforce, research and system initiatives to target gaps and avoid duplication
- Embedding partnerships and knowledge integration, including First Nations peoples, environmental experts, wildlife rehabilitators and frontline practitioners
- Coordinating research and innovation investment through existing networks to support shared national priorities.

Legislation and Regulation

Legislative reform should support a more consistent, integrated and effective national biosecurity system.

There is an opportunity to strengthen how wildlife and environmental health are reflected within legislative and regulatory frameworks and embedded in reform implementation. Strengthening alignment across jurisdictions and sectors will support a more coordinated One Health approach.

Legislative and regulatory reform would be strengthened through:

- Harmonising regulations across jurisdictions and sectors to reduce complexity and improve system efficiency
- Enabling data sharing and cross-sector governance, including removal of unnecessary legislative barriers
- Strengthening recognition of wildlife and environmental health within biosecurity frameworks to support more integrated risk management
- Building on existing work, including the Australian Centre for Disease Control's One Health governance initiative.

Funding

Funding reforms should support a sustainable, coordinated and nationally consistent biosecurity system. There is an opportunity to strengthen shared responsibility and align investment across sectors, consistent with a One Health approach, while ensuring funding settings are sufficiently flexible and agile to respond to emerging threats.

Current cost-sharing arrangements do not always reflect the national significance of biosecurity risks, particularly for environmental and wildlife health, where impacts extend beyond jurisdictional boundaries. Revisiting these arrangements would support more equitable investment and improved decision-making.

Rising biosecurity risk—driven by increased trade and travel, climate change and biodiversity loss—also highlights the need to ensure funding settings are fit for purpose into the future. Current funding levels for environmental biosecurity responses may not be sufficient to meet increasing demand and complexity.

Funding reforms would be strengthened through:

- Developing cost-sharing models that reflect national benefit and shared responsibility across jurisdictions
- Increasing investment in prevention, preparedness and surveillance, aligned to system risk and priorities
- Ensuring funding arrangements are flexible and agile, able to respond to emerging and rapidly evolving biosecurity threats
- Building on proven capabilities, partnerships and funding frameworks, avoiding duplication and leveraging existing investments to support long-term system resilience.

Part 3 - National Biosecurity Strategy Implementation

The National Biosecurity Strategy (NBS) provides a strong foundation for Australia's biosecurity system. Reform should align with and build on this progress, focusing on integration and coordination rather than creating additional layers or parallel structures.

Implementation would benefit from stronger alignment across sectors, reflecting a One Health approach and supporting more coordinated delivery. While existing governance arrangements provide a sound basis for implementation, challenges remain where responsibilities span multiple sectors. This has been evident in H5 HPAI preparedness, where effective outcomes were achieved through a multi-sector Taskforce and the development of the H5 NMA. This provides a practical example of joined-up governance in action.

NBS implementation would be strengthened through:

- Embedding One Health across all NBS reform priorities
- Strengthening cross-sector governance and coordination, building on existing structures rather than creating siloed arrangements
- Enhancing engagement with stakeholders, including meaningful and early involvement of First Nations peoples in line with the Intergovernmental Agreement on Biosecurity Review
- Improving communication and visibility, drawing on existing networks and expertise (including NBCEN)
- Developing integrated monitoring and reporting frameworks to support system-wide performance and accountability.