



**Australian Government**  
**Department of Agriculture**  
**and Water Resources**

## Submission cover sheet—Intergovernmental Agreement on Biosecurity Review

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# **Submission to the Australian Government Department of Agriculture and Water Resources (DAWR) with respect to the Intergovernmental Agreement on Biosecurity (IGAB).**

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## **Our Industry**

The industry is comprised of four marine farming companies Tassal Group Ltd, Huon Aquaculture Group, Petuna Pty Ltd, and Van Diemen Aquaculture Pty Ltd. Marine farms are supplied with juvenile stock from several freshwater hatcheries, most of which are individually owned by one or other of the farming companies. In addition, there are numerous independent companies that directly support the industry, such as the Saltas hatchery, Snowy range hatchery and Targa hatchery. There is also a growing number of service companies that are part of the successful development of salmonid farming in Tasmania, including but limited to, Skretting, Ridleys, Mitchells Plastic Welding, De Bruyn, Plastic Fabrications, SeaFarm.

The industry is fully vertically integrated. It both produces and purchases smolt (young salmon) for its diversified marine sites situated around Tasmania (geographic distribution mitigates environmental and disease risk). Fish are harvested in the main at Dover, in the lower Huon River and Macquarie Harbour prior to packaging and/or further processing at the specialist sites, Huonville, Margate, Devonport, and Parramatta Creek.

From an initial 56 tonne harvest in 1986-87, in 2015, the Tasmanian salmonid farming industry:

- produced in excess of 55,000 HOG (head on, gutted) tonnes of Atlantic salmon & ocean trout with a GVP of approximately \$650M;
- provided direct employment for 2,092, and indirect employment for a further 3,850, largely in rural areas;
- the industry's fish growing and processing operations are spread across most regions around the state, from south to north; and
- exported almost \$80M worth of premium salmon and ocean trout to countries all around the world.

The Tasmanian salmonid industry is now:

- the largest single "fishery" sector in Australia by GVP;
- by far the largest aquaculture sector in Australia;
- the largest primary production sector in Tasmania;
- larger than all other aquaculture and fishery sectors in Tasmania combined; and
- a significant contributor to the Australian "food bowl" concept.

The Tasmanian Salmonid Growers Association (TSGA) is a not for profit organisation established by its grower members almost 30 years ago to represent the Industry by working with Federal and State Governments and their regulatory agencies.

TSGA is charged by its members with ensuring that reasonable and viable operating standards and conditions are established for the industry by an industry/government partnership within an appropriate regulatory framework.

The number one priority for the TSGA is the maintenance of freedom of disease and pest status in Tasmania as it relates to salmonids. Many of the serious diseases and pests of concern are exotic to Australia and will potentially have major implications for aquaculture and fisheries across Australia. Tasmania's unique pest and disease status should be recognised and maintained to ensure the ongoing viability of primary industry in Tasmania. As a region heavily reliant on primary industries and its clean green image, which not only underpins primary production, but other significant sectors such as

tourism, the consequences of an exotic pest or disease incursion would have a far greater consequence on the Tasmanian economy than in most other states.

Our regional freedom from certain pests and diseases has many important implications for Tasmania including:

- Viability of the salmonid sector – certain exotic diseases and pests are likely to render the industry unviable. Increased market access in overseas markets.
- Significantly reduced antibiotic usage (currently negligible relative to comparable overseas salmonid farming regions such as Chile where antibiotic use is considerable).
- Reduced WHS risk due to reduced chemical usage.
- Brand enhancement for the “clean and green” image.
- Downstream branding – hospitality and tourism.

Key points regarding the risks associated with losing regional differentiation for salmon aquaculture can be found in Appendix 1.

## Executive Summary

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- The Tasmanian Salmonid Growers Association (TSGA) believes the IGAB is a proactive and cooperative approach to the management of Biosecurity for Australia
- The TSGA recognises that the Tasmanian State Government has not signed the IGAB due to concerns with Section 7, Subsection 7.19- *Interstate Trade*. The TSGA supports this position and requests that the section is redeveloped to accept that a state must retain the right to make and defend its own decisions
- The TSGA views the IGAB as an ‘agreement between partners’, not a tool of the Commonwealth Government to control domestic and international biosecurity
- In order of importance, the following are the TSGA’s most significant current and future biosecurity risks and priorities for Australia:
  1. Appropriate protection of pathways to entry – horizon scanning to compile and rank list of potentially invasive species.
  2. Evolution/expansion of first points of entry management – increased monitoring and surveillance
  3. Giving biosecurity prime importance when considering trade related matters
  4. Ensuring we do not put at risk the long term future of our primary industries for short term economic/political gains
  5. Climate change – rapidly changing range of current/potential pests and diseases.
  6. Adequate resourcing of monitoring/response activities.
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## Introduction

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## In Summary

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Although biosecurity can be a complex and challenging activity for federal, state and territory governments, the Tasmanian salmonid industry is poised to lose our reputation for being a world leader. Tasmania's advantage of being relatively free of pests and diseases, in the face of increasing global trade and visitors is under threat—putting primary producers, regional economies, the environment and Tasmania's clean green image at risk.

The omissions of the regulations are easily rectified. Where possible we have identified the simple changes necessary to correct these omissions. While we accept that these simple changes will not be incorporated verbatim, they clearly articulate our proposed solution in the spirit of being helpful to the Committee.

Finally, the TSGA strongly believe that there is desire by both industry and government to '*get this right*'. The last thing we want to see is the regulations and guidelines '*rushed*' and an inferior outcome achieved early. We strongly urge the Department to:

- Maintain purposeful engagement and consultation with stakeholders.
  - Set appropriate time frames for review and consideration.
  - Eliminate inconsistencies that exist with other legislation that is being simultaneously developed.
- We have waited 104 years to replace the Quarantine Act 1908; it is imperative that the time is taken to ensure that critical omissions are properly addressed in the regulations and guidelines, in an atmosphere of good governance.

The TSGA and its members are available to provide professional, informed advice and testimony to the Committee; and we respectfully request the opportunity to do so.

I thank you for the opportunity to comment on the proposed *Biosecurity (Prohibited and Conditionally Non-prohibited Goods) Determination 2016* and I look forward to your reply.

Yours sincerely,



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## Appendix 1

### Key points regarding the risks associated with losing regional differentiation for salmon aquaculture

- National considerations must include consideration of, and **not be to the detriment** of, a specific state(s) economy or capacity to generate income.
- Social and environmental consequences of maintaining regional differentiation are important drivers of biosecurity. In regions such as Tasmania, preservation of World Heritage Areas and other environmentally sensitive areas is essential as it is also financially significant to the state's economy both now and into the future.
- It is important that the subordinate legislation, which is currently focussed on trade risks, captures the gamut of biosecurity risks which affect a jurisdiction. When does an Appropriate Level of Protection (ALOP) take into consideration brand image, tourism, hospitality or regional economies of scale? When an ALOP is profiled against a specific disease or pest threat it almost certainly does not take into consideration the broader consequences of a biosecurity breach. In Tasmania, a primary industry can be the mainstay of a regional community. It can be the item on every single menu across the state and even nationally, it can be the iconic image on tourism advertisements, and it can sometimes provide the only remaining impetus to keep local schools and shops open.
- Tasmania must be able to exercise its rights in relation to protecting its borders to ensure that the Tasmanian economy and well-being of the state are maintained.
- Whilst it has been argued that having one single national approach makes market access easier and reduces confusion, Australia deals with a number of countries that continue to maintain regional differentiation due to pest and disease risk; two examples being USA and China. Australia respects the rights of foreign countries to set regional zones based on quarantine status and therefore Australia should recognise within its own federation the rights of states to have their own quarantine zones and restrictions as well.
- Tasmania has several unique characteristics which reinforce the potential for risks to be assessed at a regional level. With Bass Strait acting as a natural barrier and strong quarantine protection through entry points, the ability for Tasmania to maintain a separate quarantine zone is feasible and demonstrable by resource allocation. Tasmania, through the strength of its quarantine measures, has successfully maintained area freedom from several mainland pests such as fruit fly
- Furthermore, the consequences of serious exotic disease incursions or pest establishment in Tasmania can have immediate and considerable consequences on the regional economy of Tasmania. One in five people are directly or indirectly employed in primary industry in Tasmania and the income generated from the sector underpins the survival of our regional areas and towns.
- The crisis caused in the Chilean industry by the trio of Infectious Salmon Anaemia (ISA), Salmon Rickettsial Syndrome (SRS), and sea-lice, is now acknowledged to have halved production and cost 25,000 jobs in rural Chile. There is now evidence that the ISA virus was introduced into Chile in 1996/97 via **imported material**, before emerging as a disease in 2006 and exploding as a disease catastrophe in 2008/09. Following this collapse, considerable restructuring of the industry occurred. Despite this, ISA has re-emerged in the last couple of years as a serious problem. SRS continues to be a major cause of economic loss in the Chilean salmon industry which still incurs large mortalities despite the large amounts of antibiotic used to try and control this disease. See **Appendix 1** for more information on ISA.
- Pancreas Disease is another serious disease found in Norway and Scotland requiring stringent management practices to control its spread. Norway was divided into two regions on the basis of Pancreas Disease status, but a couple of years ago a new strain of Pancreas Disease not previously known in Norway (but present in Scotland) was found in Norway, necessitating a review of the regional boundary.

- Spring Viraemia and Koi Herpes virus of cyprinids is on the increase in the UK. Viral Haemorrhagic Septicaemia (VHS) virus is spreading in the United States. The common thread is pathogens inadvertently transferred from one environment to another, then finding a suitable host to become established. Once new pathogens or pests become established in the aquatic environment it is virtually impossible to eradicate them - unlike in a terrestrial situation where there is at least some opportunity for isolation and control.
- In addition to Infectious Salmon Anaemia Virus (ISAV), Pancreas Disease Virus (PD), Salmon Piscirickettsia (PRS) and Viral Haemorrhagic Septicaemia Virus (VHSV), the list of serious infectious salmonid diseases found overseas but not present in Australia includes but is not limited to : Infectious Pancreatic Necrosis Virus (IPNV), Infectious Haematopoietic Necrosis Virus (IHNV), Cardiomyopathy Syndrome Virus (CMS), Heart and Skeletal Muscle Inflammation Virus (HSMI), *Vibrio ordalii*, *Myxobolus cerebralis* (brain parasite), Bacterial Kidney Disease (BKD), and *Lepthiotherius salmonis* louse.
- Import risk assessments should be focused on the science of the issue, examining the potential for imported product to carry exotic disease pathogens and pests, the risk of introduction to the aquatic environment and ultimately the consequences of the disease or pest becoming established. Many of these considerations rely on the availability of sensitive and specific diagnostic testing capability. There is often also a political component which is heavily biased in favour of national rather than regional interests, particularly given the pressures of international trade, trading away one industry sector against others.
- In 2009 TSGA members, representing 98% of the salmonid farming industry in Australia, implemented a strategic plan aimed at growing the industry 80% by 2020, and doing so in a sustainable fashion. As consistently demonstrated over many years of advocacy we remain extremely concerned about the disease and pest risk posed by imported material, a factor largely determined by the federal government and out of our control. We consider it very fortunate that the Tasmanian Government, with the support of many Tasmanian senators in the Federal Parliament, resolved to implement additional measures to restrict the movement of imported salmonid product into Tasmania thereby reducing the biosecurity risk from exotic salmonid diseases and pests.
- Even with this added level of protection, salmonid product biosecurity breaches still occur in Tasmania. Earlier this year, on three different occasions, non-approved imported salmonid products were found on Tasmanian supermarket shelves and reported to the regulators by concerned consumers. As an industry we will not accept ignorance as an excuse for non-compliance by the importers of these products.
- While such regional restrictions are easily justifiable on a scientific basis, the Tasmanian salmonid industry has been committed to the Tasmanian Salmonid Health Surveillance Program (TSHSP) which underpins demonstration of specific exotic disease and pest freedom. The TSHSP is a joint initiative between the Tasmanian Department of Primary Industries, Parks, Water and Environment (DPIPWE) and the Tasmanian Salmonid Growers Association that has been in operation since 1993. One of the key objectives of the TSHSP is demonstration of freedom for those salmonid diseases and pests considered exotic to Tasmania, but not necessarily Australia, in order to provide support for maintaining state border biosecurity regulations.