

Feedback on NSW Department of Primary Industries Consultation Draft: NSW Biosecurity and Food Safety Strategy 2022-2030

Thank you for the opportunity to provide feedback on the consultation draft strategy.

The vision "working together to protect the economy, the environment and the community from biosecurity and food-related risks" is clear though "the economy" being listed first suggests it is prioritised above the others (though one assumes the matters have equal weight). There is no reference to 'animals' and there ought to be: whether farm animals or other animals, disease outbreaks can have devastating consequences for animals (and those who care for them).

The One Health approach is good, but a One Welfare approach would be better. We have attached a journal article and summary of One Welfare, which essentially extends beyond 'health' into 'welfare' https://www.onewelfareworld.org/

Poor welfare leads to poor health, in human and non-human animals. For example, crowding and stress promote disease outbreaks, and even when those diseases aren't necessarily significant biosecurity threats, they might be treated with antimicrobials and contribute to antimicrobial resistance.

There is no reference in the strategy to the importance of good animal welfare in biosecurity and food safety, nor reference to the relevance of human welfare. As an example, a person's mental wellbeing could have significant bearing on how they respond to biosecurity threat, and a biosecurity crisis could threaten a person's welfare. COVID-19 highlighted this and was recognised by governments, the health and social welfare sectors, as well the community in general. These intersections between health and welfare, human and nonhuman, need to be acknowledged.

The strategy notes the importance of people and partnerships to the success of the strategy; underscoring this, but not mentioned in the strategy, is trust.

A report (attached) by the International Federation of Red Cross and Red Crescent Societies and UNICEF prepared for the Global Preparedness Monitoring Board https://www.gpmb.org/ highlights the centrality of trust to successfully preparing for and managing health emergencies. They note that "Despite its importance, public trust in institutions required for preparedness (government, NGOs, business and the media) decreased markedly over the last decade based on public perceptions of competence (delivering on promises) and ethics (doing the right thing and working to improve society)" (p6) and that "Lack of confidence in institutions and organisations leads to questioning the validity and impact of predicted threats ... Mistrust impedes planning and response" (p5).

Consultation on the strategy and the acknowledgement of the importance of partners and community engagement are positive steps toward building trust but in our view the strategy should include an explicit commitment to building trust and to adopting an ethical framework.

There are several references to new technologies, surveillance, and data sharing; if these are not underpinned by an ethical framework, they are likely to foster distrust and might well increase risks.

There is reference to a "social licence" for emerging technologies, but this is in a summary list of "emerging challenges" – the strategy itself does not address the importance of ethics. For example, and of deep concern to us, "Automate predator baiting methods" is listed as an activity but there is no commitment to research and employ humane approaches to animal management.

We note the strategy's reference to "Governance", accountability, and transparency, and we agree these are critical and must be delivered in deeds not just words. If the system is opaque, if whistle-blowers are not protected, if decisions, including funding decisions, are not fair and transparent then the system will fail.

The strategy is relevant to Cat Protection and the companion animal and veterinary sector. Cat Protection invests in many measures to promote biosecurity, from community education on responsible cat ownership to faecal screening of all cats and kittens entering our shelter. Our objectives in biosecurity management align with the four headline objectives in the draft strategy, that is, we aim to prepare and prevent; respond; contain; and work in partnerships.

Given the greater return on investment for preparedness and prevention than other measures, it is very concerning that "The national biosecurity system is challenged by eroding budgets ..." (p11 draft strategy). A strategy is important to guide the management of biosecurity and food safety, but it must be well-resourced and well-supported to be effective.

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