

FLYING MINUTE: WALGA Submission on the Review of the National Environmental Biosecurity Response Agreement (NEBRA)

By Melanie Davies, Senior Policy Advisor, Environment

WALGA RECOMMENDATION

That State Council endorse the submission on the Review of the National Environmental Biosecurity Response Agreement (NEBRA).

RESOLUTION 266.FM/2026

CARRIED

EXECUTIVE SUMMARY

- The Australian Government Department of Agriculture, Fisheries and Forestry (DAFF) is undertaking the five-year review of the National Environmental Biosecurity Response Agreement (NEBRA), with the consultation period closing on 20 April 2026.
- The NEBRA is one of three national agreements that govern how Australia responds to biosecurity threats of national significance that impact the environment and social amenity.
- WALGA's submission has been informed by Local Governments experience with the Polyphagous shot-hole borer (PSHB) response and preparedness activities for H5 Bird Flu.
- Key points in WALGA's submission:
 - Extending the NEBRA's focus beyond eradication in cases where containment would mitigate significant additional costs and impacts should the pest or disease become widespread in Australia (e.g. PSHB).
 - The need to include Local Government in the NEBRA governance and decision-making model, in recognition of the sectors position as a significant land manager and key delivery partner for biosecurity responses.
 - Reviewing whether there is support for devolving national funds across all key response partners, including Local Government, to support more agile and consistent management of incursions across the landscape.
 - That the NEBRA is not currently an effective arrangement for all environmental biosecurity incidents of national significance, with some requiring separate national agreements (e.g. H5 Bird Flu).
 - The importance of ensuring decisions on the eradication and transition to management response phases are underpinned by a cost-benefit analysis that considers the economic, social and environmental impacts of the pest or disease.
 - The need to ensure continual evaluation and adaptive management mechanisms are in place throughout the relevant response phase, through consultation with response partners.
- This submission was provided to the Environment Policy Team for feedback out of session.

ATTACHMENT

- Draft WALGA submission on the Review of the National Environmental Biosecurity Response Agreement (NEBRA)

POLICY IMPLICATIONS

This submission aligns with WALGA's current Advocacy Position [4.4 Post Border Biosecurity Advocacy Position](#) and previous WALGA submissions on the draft National Biosecurity Statement (2018) the review of the *Biosecurity and Agriculture Management Act 2007*.

BACKGROUND

Western Australia is facing increasingly complex and concurrent biosecurity threats. It is recognised that the greatest return on investment is achieved through prevention and early intervention (eradication) of new biosecurity incursions.

For new biosecurity incursions of national significance, the National Environmental Biosecurity Response Agreement (NEBRA) provides a framework for the Australian Government, State and Territory Governments and partners to work together to respond. The NEBRA aims to protect Australia's environment and social amenity from significant environmental biosecurity threats. It establishes the national framework for decision-making, coordination and cost-sharing between parties.

Public consultation on the NEBRA focuses on the seven themes outlined in the [NEBRA public discussion paper](#). The review aims to determine whether the NEBRA operates effectively and efficiently to achieve outcomes.

The NEBRA is one of three national agreements that govern how Australia responds to biosecurity threats of national significance. The two other agreements are the Emergency Plant Pest Response Deed (EPPRD) and the Emergency Animal Disease Response Agreement (EADRA). These agreements are industry focused national cost-share response arrangements that aim to protect economic consequences to crop (horticultural) and animal (livestock) sectors. The NEBRA, EPPRD and EADRA are the key mechanism of operationalising the goals and objectives of the [Intergovernmental Agreement on Biosecurity](#) (2019).

WALGA considers that the importance of Local Government is not acknowledged in these national biosecurity frameworks.

COMMENT

The submission draws on WALGA's experience with Polyphagous-shot hole borer (PSHB) and preparedness work on H5 Bird Flu, which while managed under the EPPRD and a separate national arrangement respectively, illustrate similar principals and issues. In particular, the PSHB response identified Local Governments limited ability to provide direct input and expertise in national decision-making forums, or access national funding to support the delivery of on-ground operations.

WALGA met with the NEBRA Review Team to discuss the terms of the review and NEBRA public discussion paper. The team have indicated that feedback on the NEBRA will be considered within the context of all national biosecurity agreements due to their complementary operation. WALGA also met with other States and Territory Associations to discuss common issues with the current operation of the NEBRA.

The submission was provided to the Environment Policy Team for feedback out of session.

FLYING MINUTE OUTCOME

Poll created: 13/04/2026 at 12:00

Poll closed: 20/04/2026 at 17:00

Name	Completed Date
Chris Antonio	14/04/2026 17:59
Phillip Blight	19/04/2026 19:51
Laurene Bonza	20/04/2026 7:43
Donelle Buegge	19/04/2026 17:05
Scott Crosby	No response
Patrick Hall	13/04/2026 18:43
Cate McCullough	20/04/2026 13:49
Lewis Hutton	No response
Paul Kelly	20/04/2026 22:47
Terresa Lynes	15/04/2026 10:34
Paige McNeil	15/04/2026 16:38
Chris Mitchell	15/04/2026 16:40
Matthew Niikkula	15/04/2026 15:01
Les Price	13/04/2026 15:54
Helen Sadler	13/04/2026 20:53
Robert Schmidt	14/04/2026 10:54
Eman Seif	14/04/2026 6:13
Audra Smith	20/04/2026 14:15
Stephen Strange	20/04/2026 14:02
Liz Sudlow	No response
Mike Walmsley	19/04/2026 8:44
Karen Wheatland	16/04/2026 7:41
Barry Winmar	20/04/2026 10:58

The submission was endorsed.

Following State Councillor feedback, the Submission was updated to include examples from the northern region of Western Australia.



WALGA

Influence. Support. Expertise.

Submission on the Review of the National Environmental Biosecurity Response Agreement (NEBRA)

April 2026

About WALGA

The Western Australian Local Government Association (WALGA) is an independent, member based, not for profit organisation representing and supporting the WA Local Government sector. Our membership includes all 139 Local Governments in the State.

WALGA uses its influence, support and expertise to deliver better outcomes for WA Local Governments and their communities. We advocate to all levels of Government on behalf of our Members, and provide expert advice, services and support to Local Governments.

WALGA's vision is for agile and inclusive Local Governments enhancing community wellbeing and enabling economic prosperity.

Acknowledgement of Country

WALGA acknowledges the continuing connection of Aboriginal people to Country, culture and community. We embrace the vast Aboriginal cultural diversity throughout Western Australia, including Boorloo (Perth), on the land of the Whadjuk Nyoongar People, where WALGA is located and we acknowledge and pay respect to Elders past and present.

Introduction

WALGA welcomes the opportunity to provide feedback on the 2026 Review of the National Environmental Biosecurity Response Agreement (NEBRA).

Western Australia faces increasingly complex and concurrent biosecurity threats impacting urban environments, natural ecosystems and local infrastructure. South West Western Australia is one of 36 internationally recognised biodiversity hot spots, with introduced pests and diseases presenting a high risk to the unique flora, fauna and ecological assemblages.

Local Government has a significant role in biosecurity management, as land managers, regulators, community representatives and through their emergency management responsibilities. Effective national arrangements to facilitate a coordinated and cost shared approach to manage nationally significant environmental biosecurity incidents are essential. The [National Statement on Biosecurity](#) identifies that Local and State Governments have equivalent roles, but the recognition is not reflected in any of the National Agreements.

WALGA has been actively engaging with the Australian and Western Australian Governments on governance frameworks, legislation and policy mechanisms to strengthen biosecurity systems. Key requirements include clear roles and responsibilities of system participants, increased recognition of environmental biosecurity, adequate and sustainable funding across the biosecurity continuum and an increased emphasis on education and enforcement activity.

In developing this feedback WALGA has drawn on direct experience with the national response to the Polyphagous shot-hole borer (PSHB) which, although managed under the separate Emergency Plant Pest Response Deed (EPPRD), has parallels with the NEBRA. WALGA is also engaged in the preparedness work on H5 Bird Flu, which is being prepared for through a separate national mechanism.

Theme 1: Benefits and outcomes of the NEBRA

WALGA considers that there is **a lack of clarity regarding which national response (NEBRA, EPPRD or the Emergency Animal Disease Response Agreement) is triggered for a suspected emergency pest or disease**. This has implications on the delivery of the biosecurity responses due to the differing funding arrangements and decision-making representatives under each agreement.

Since 2018, a number of suspected emergency pests or diseases reported to NEBRA did not proceed to a response plan due to the decision that they were not technically feasible to eradicate. The Australian Government has recognised with H5 Bird Flu that eradication in wildlife was not possible and has put in place a separate process to the NEBRA to address this. This suggests that the **NEBRA is not sufficient for complex biosecurity responses**.

Theme 2: Decision making and governance

The National Management Group (NMG), as the peak national biosecurity decision-making forum, should include representation from key stakeholders involved in delivering national biosecurity responses. Local Government is a significant land manager and a critical delivery partner, yet is treated as one of several 'other contributors' in the NEBRA. NEBRA decisions directly affect Local Government operations, but the sector is not given the opportunity to consider advice from the National Biosecurity Management Consultative Committee (NBMCC) or contribute to decision making. Local Governments' on-ground experience in managing biosecurity incursions would add valuable operational insight to national discussions. **The NEBRA governance model should be amended to include all tiers of Government, recognising the significant contribution of each to biosecurity responses.**

In WA, the Department of Primary Industry and Regional Development (DPIRD) is the lead agency for biosecurity responses and the primary representative on the NMG. DPIRD's core remit is supporting and developing primary industries and regional economies. Including agencies or members with environmental expertise on NEBRA governance committees would help ensure environmental risks and impacts are properly considered in decision making.

The requirement to undertake a cost-benefit analysis to inform decisions on whether to commence or continue an eradication response is integral to transparent, evidence-based decision making. WALGA supports NEBRA guidance on conducting a cost-benefit analysis, including the use of qualitative assessments where it is difficult to quantify impacts across economic, environmental and social values. **It is important that there is appropriate guidance to ensure that cost-benefit analysis undertaken to inform decision making is comprehensive, and appropriately values economic, social and environmental costs and benefits.**

Theme 3: Delivery, coordination and implementation

WA's experience with PSHB has shown the importance of national arrangements to support State Government eradication activities, facilitate a cohesive approach to management and mitigate the varying financial and resourcing capacity of land managers. In California and South Africa, PSHB infestations have continued to spread and have a significant impact on the natural environment and community amenity due to the absence of government coordination and investment.

The NEBRA Review highlights the significant burden placed on lead jurisdictions in a national response. WALGA has identified this as an issue in the PSHB response and included in its [2026-27 Budget Submission](#) an allocation of \$20 million per annum from 2026-27 to strengthen capacity for urgent interventions, which can be compromised by funding uncertainty. Although not directly within the scope of the NEBRA review, **it is important to note the critical importance of the preparedness and capacity of lead jurisdictions to the success of a national response.**

Theme 4: Review, assurance and improvement

WALGA's experience with PSHB was that although DPIRD provided an outline of response plans, they were not publicly available. There should be consideration of making response plans publicly available to support transparency. The lack of visibility of response plans can contribute to a lack of trust and confidence.

WALGA recommends that monitoring of the NEBRA's outcomes is improved through engagement with key partners in the implementation of response plans, to gather feedback on what worked well and any challenges or barriers experienced during eradication or transition to management phases. Reviews should occur on an annual basis to support continual improvement and adaptive management, rather than being left to the end of a response phase. Review of responses under other Deeds or Agreements can also inform the review process for the NEBRA.

Theme 5: Funding, cost sharing and resourcing

Current NEBRA funding and participation arrangements present a financial/resourcing barrier for Local Governments, given the requirement to contribute a minimum of 2.5% of eligible costs through dollar amounts or in-kind contributions. Participation on the NMG should reflect the Local Government sector's existing significant financial and in-kind resources to national biosecurity responses.

For example, under the EPPRD the State Government invested \$4.7 million towards the national cost-shared eradication fund of \$41.29 million over three years. Resource allocation from a sample of seven Local Governments in the Quarantine Area was in excess of \$2 million during the same period to employ PSHB staff positions, and undertake surveillance, tree treatment and recovery activities.

The PSHB response highlighted the varying financial and resourcing capacity of Local Governments, with well-resourced Local Governments, with some able to allocate additional funding (\$200,000 - \$1 million) for management, while others were limited to utilising existing tree maintenance budgets that were already at capacity. **WALGA recommends the review consider support for devolving funds across all key response partners, including Local Government, to support consistent management across the landscape.** This would also enable a more agile response by removing delays associated with centralised State Government processes, such as establishing contractor panels and determining legislative approval requirements for undertaking treatments on other land tenures.

WALGA considers that information on how each NEBRA response is funded and resourced needs to be more transparent and better communicated. The PSHB response was often mistakenly viewed as an Australian Government led response rather than a nationally cost-shared response supported by a collective decision-making framework.

Theme 6: Supporting effective use of the NEBRA

The community is a vital partner in surveillance to identify and treat the target pest or disease. For example, PSHB was first identified in Western Australian through a community member who reported to DPIRD via the MyPestGuide App. Local Government considers it is essential to continue to improve the community's understanding, awareness and action in relation to biosecurity to assist with threat surveillance and timely response to incursions.

There also needs to be an increased emphasis on compliance through enforcement activity. For example, it is recognised that spread of PSHB in WA is most likely to occur through human assisted movement of infested timber and green waste. However, it is evident that Western Australians continue to move firewood and green waste outside of the Quarantine Area without penalty, demonstrating the need for State Government education and awareness to be delivered in tandem with enforcement of biosecurity requirements.

Theme 7: Keeping the NEBRA effective

WALGA strongly supports extending the NEBRA's focus beyond eradication; where it is in the national interest to continue cost-share arrangements to support containment and mitigate significant impacts on Australia's environment and people. For some environmental pests and diseases eradication may not be practically possible but there is high national benefit to containment. While this may be viewed as placing additional demands on governance and resourcing of the NEBRA, the coordinated governance and cost-share model is the most effective way of minimising significantly higher costs and impacts should the pest or disease become widespread in Australia.

For example, predictive modelling of the potential distribution of PSHB has shown that the species is capable of very high population growth and that the east coast of Australia, particularly Queensland, has favourable conditions. Nationally effective biosecurity measures are essential to prevent secondary introduction of PSHB into new parts of Australia and the costs associated with widespread management.

The H5 Bird Flu national response required a separate agreement because there was recognition that eradication in the wild bird population was not possible but a national biosecurity response was still required.

Local Government has also identified that pest such as Cane Toad, although not eradicable, need to have long term and effective responses in place to protect biodiversity.

Conclusion

As identified in the National Biosecurity Statement, Local Government is a key stakeholder in biosecurity. The inclusion of Local Government in the NEBRA, and other national biosecurity arrangements, would ensure the effective and timely responses to biosecurity incursions from all tiers of Government.

The NEBRA should be amended to extend beyond eradication focused response, particularly in the cases where eradication is not possible but containment would provide national benefit or there would a significant impact on the environment.

Local Governments experience with PSHB and H5 Bird Flu demonstrates that the current national biosecurity arrangements are not able to effectively adapt to the changing landscape of biosecurity and increasing complex responses effective the urban or natural environment.