



Submission to

Biosecurity Protection Levy

October 2023

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About the [REDACTED]

The [REDACTED] is the [REDACTED] that represents [REDACTED]. [REDACTED] is comprised of regional, State, and Commonwealth [REDACTED] and marketing associations, and individual fishing companies around Australia. [REDACTED] represents and makes this submission on behalf of our members:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Executive Summary

While the [REDACTED] commends the Australian Government for its intention to improve resourcing for Australia's biosecurity it does not support application of a commodity or species-based levy within the [REDACTED].

It is noted that the primary source of funds is proposed to be derived from taxpayers 44% (up from 38%), importers 45% (down from 59%), domestic producers 6% (up from 0%), Australia Post 2% (up from 0%) and low value imports 3% (up from 0%).

The [REDACTED] holds the following views:

1. Any share of commercial [REDACTED] sector biosecurity contribution should reflect its negligible risk creator role, its inability to control the risk management of others and the subsequent penalty the sector has internalised under disease control orders. The extent of the sector's benefit is also disproportionate as it operates in public waters utilised for many purposes.
2. With no confidence that cross jurisdictional post-border biosecurity issues are currently resolved for [REDACTED] import protocols, the [REDACTED] seeks transparency on how a better resourced biosecurity system will resolve the issue of post border biosecurity regulation.

and Market Supply

Seafood market share: The commercial [redacted] is the second largest fishing sector in Australia valued at \$280M GVP (ABARES, 2020). (note: the downstream economic value of the sector is not included in this figure.)

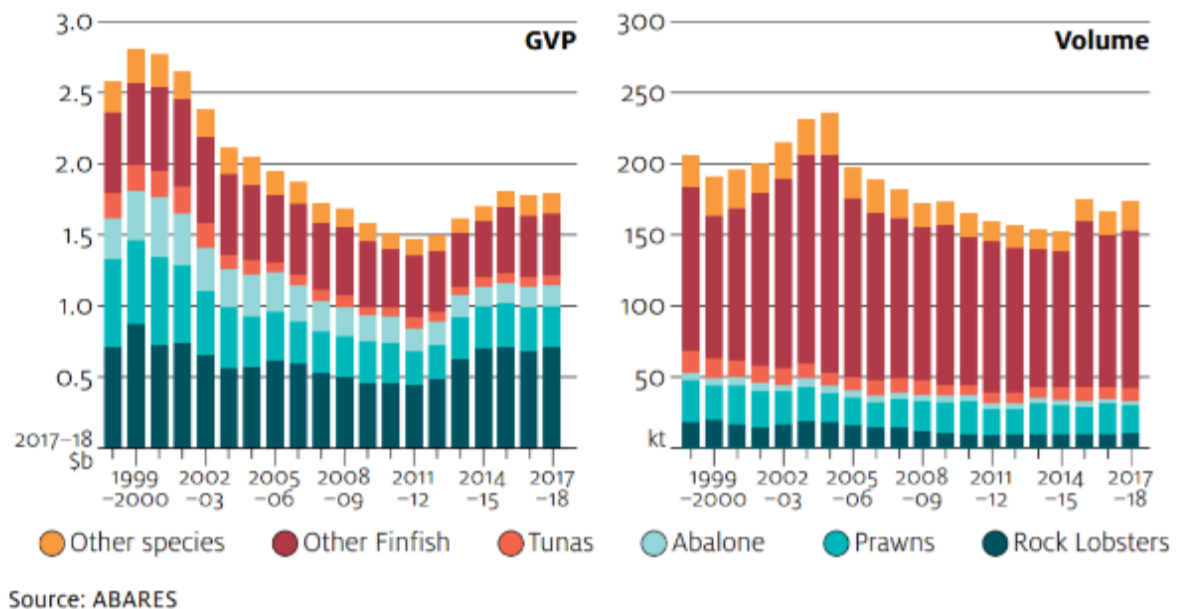


Figure 1: [redacted] GVP and volume by major species 1999-2000 to 2017-18

Fisheries and businesses:

[redacted] are wild caught in the tropical, subtropical and temperate waters of Australia. Commercial [redacted] operations are comprised of a combination of incorporated companies, vertically integrated businesses and family-run dual/single boat owners.



Figure 2 - Australia's prawn fisheries

■■■■■ **market share:** Australians consumed 52,600 tonnes of ■■■■■ – 34,700 tonnes of those being imported (ABARES, 2020). Through an industry led and funded category level marketing initiated in 2013 - the ■■■■■ campaign - ■■■■■ are differentiated from ■■■■■. Approximately 14,800 tonnes of ■■■■■ consumption were Australian ■■■■■. A further 4,205 tonnes of Australian ■■■■■ was exported. The ■■■■■ also designed and voluntarily funded a sector level marketing campaign in 2022 to differentiate ■■■■■.

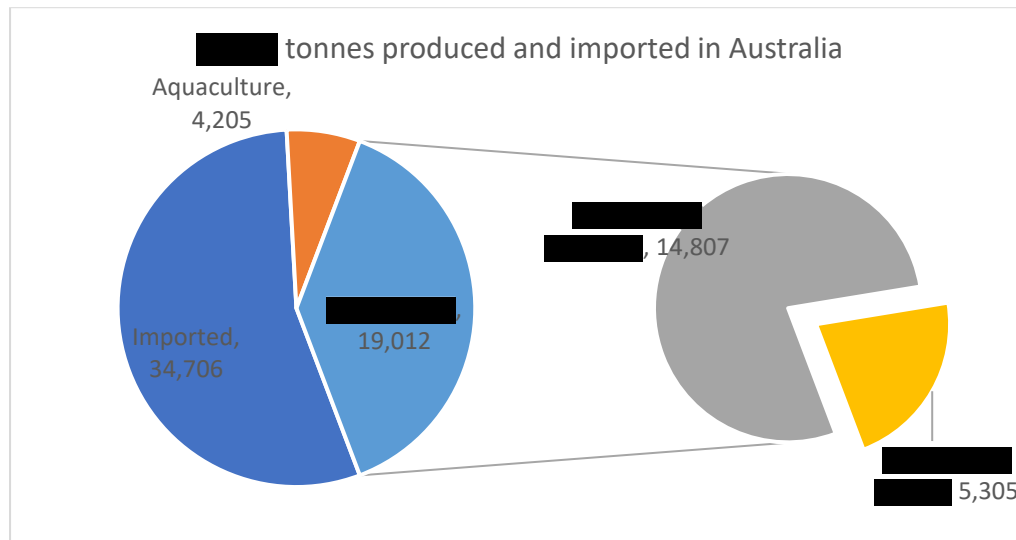


Figure 3 - ■■■■■ tonnes produced and imported in Australia (ABARES, 2020)

Path to consumers: It is estimated that approximately 75% of Australia's 18,000 tonne ■■■■■ for domestic consumption is supplied for retail sale. The majority of Australians purchase their ■■■■■s from supermarket deli cabinets with a growing portion of frozen pre-packed lines (Nielsen, 2023). The balance of Australia's ■■■■■, approximately 25%, is supplied to food service where information on product origin is voluntary. ■■■■■ are one of the most popular seafood menu items (FRESHO data for the ACPF, 2022).

**includes approximate total domestic production for both ■■■■■*

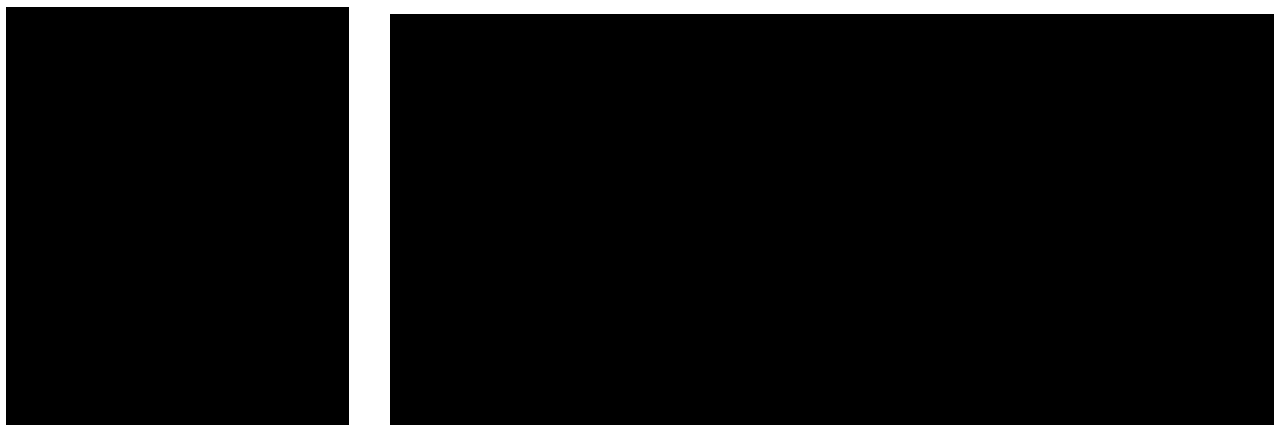
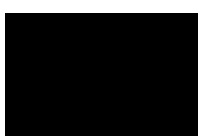


Figure 5 - Frozen pre-packed ■■■■■ and the bulk of sales via retail deli



Aquatic animal disease management risk and beneficiaries

Recent outbreaks of White Spot Disease in [REDACTED] point to the very limited control that the [REDACTED] has over disease entry, the inability of Australia's biosecurity system to accurately determine the point of entry and to confine its spread.

The inability for Australia's seafood industry sectors to agree to the proposed Emergency (Aquatic) Animal Disease Response Agreement (EADRA) is a reflection of the difference between terrestrial and aquatic sectors and the risk acceptance between State and Federal jurisdictions. Terrestrially produced food is largely from private land whereas aquatic food is produced in publicly accessible waters. The number and type of risk creators is vastly different between the two sectors as is the ability to control disease spread.

To exacerbate the terrestrial-aquatic difference, raw, potentially diseased, seafood product is imported into Australia, which is then removed from packaging, including all effective labelling, and sold loose in Australia's deli windows. When introduced into waterways, pathogens can have cross-species impacts in wild populations. These populations have commercial, recreational and ecological value.

In the instance of [REDACTED], biosecurity protection should be resourced by the risk creators; importers who introduce product, domestic market actors who currently are not effectively managing post border risk and recreational fishers who are known to introduce pathogens into waterways. The beneficiaries of biosecurity management are the public, who benefit from healthy biodiverse aquatic populations, and the commercial and recreational fishing sector who derive value.

Summary: Any share of commercial [REDACTED] biosecurity contribution should reflect its negligible risk creator role, its inability to control the risk management of others and the subsequent penalty the sector has internalised under disease control orders. The extent of the sector's benefit is also disproportionate as it operates in public waters utilised for many purposes.

Biosecurity investment efficacy between Federal and State jurisdiction

During the *Review of the biosecurity risk of prawns imported from all countries for human consumption*, disease introduction pathways were transparently mapped and biosecurity measures proposed according to risk. The [REDACTED] acknowledged many changes to the protocols that required increased testing and inspection for some higher risk prawn formats.

However, significant post border biosecurity measures were left unaddressed and/or partially implemented. The [REDACTED] sought better intact labelling for imported products available for retail sale as social media education campaigns on the risk of purchasing [REDACTED] for use as bait could not penetrate far enough. In advice to the [REDACTED] by the Senator the Hon. Murray Watt (as Minister for Agriculture, Fisheries And Forestry) on 24 July 2023, we were informed that "*labelling at the point of sale is a matter for each Australian state and territory government and these requirements*

are put in place at their discretion. The labelling conditions required under the Biosecurity Act 2015, apply to the importer and upon importation (and a recommendation has been made) for Australian state and territory governments to implement regulations requiring similar labelling be in place at the point of sale”.

Summary: With no confidence that cross jurisdictional post-border biosecurity issues are currently resolved for [REDACTED] import protocols, the [REDACTED] seeks transparency on how a better resourced biosecurity system will resolve the issue of post border biosecurity regulation.