



TASMANIAN SEAFOOD INDUSTRY COUNCIL ABN 61 009 555 604

13th October 2023

Department of Agriculture, Fisheries and Forestry

SecretariatBSF@aff.gov.au

Dear Sir/Madam,

Biosecurity Protection Levy

As the peak body representing the interests of Tasmanian wild capture fishers, marine farmers and seafood processors, the Tasmanian Seafood Industry Council (TSIC) is pleased to make a submission to the Department of Agriculture, Fisheries and Forestry consultation paper on the proposed Biosecurity Protection Levy.

Please feel free to contact me for more information.

Yours sincerely

Julian Harrington

Chief Executive TSIC



Tasmanian Seafood Industry Council (TSIC)

Submission to
Department of Agriculture, Fisheries and Forestry
consultation on the

Biosecurity Protection Levy

6th October 2023

Email: SecretariatBSF@aff.gov.au

Introduction

The Australian Government has committed to sustainable funding for Australia's biosecurity system. The Government has proposed that *major system beneficiaries such as agriculture, fisheries, and forestry producers, contribute to a sustainable funding model*. To this end, the Government has proposed a Biosecurity Protection Levy, to be implemented by 1st July 2024.¹

The Tasmanian Seafood Industry Council (TSIC) is the peak body representing the interests of wild capture fishers, marine farmers, and seafood processors in Tasmania. Tasmania dominates the Australian seafood industry. In 2021, Tasmania produced 91,800 tonnes of seafood, over 30% of the country's seafood harvest, which was valued at \$1.18 billion (38% of the Australian seafood industry's entire economic value)². The state supplies fresh and frozen seafood to 80% of Australians who buy seafood. The seafood industry operates around Tasmania's entire coastline and produces both wild-caught and farmed seafood species. The key species for Tasmania are farmed salmonids (65,800 t, \$887.6 million), wild-caught southern rock lobster (891 t, \$73.6 million), wild-caught abalone (1,029 t, \$61.2 million) and farmed shellfish (3,719 t, \$43.1 million). Tasmania is also home to many vessels participating in Commonwealth managed fishery, which is regulated by the Australian Fisheries Management Authority. Over 3,500 people are directly employed within the Tasmanian seafood industry, often in regional communities.³

A commitment to biosecurity

TSIC welcomes the Tasmanian and Australian Governments' commitment to Australia's biosecurity. If we make a mistake in controlling biosecurity, the effects of newly introduced diseases or pests on individual markets, or across many markets, may be severe.

White spot disease, a viral infection typically fatal in farmed prawns, was introduced into Australia through mistaken release of infected imported raw prawn material by the Biosecurity Services Group.⁴ The disease is now endemic and Australia's prawn farmers manage it, with inevitable impacts on production costs and prawn availability.

Tasmania is in a unique position within Australia, with a substantial water barrier separating the island from many of the biosecurity threats faced elsewhere in the country. For Tasmania's seafood industry, the threat of introduced exotics is easily overshadowed by threats arising from the state's changing marine environment.

Warmer waters from the East Australian Current are pushing southwards, bringing native Australian marine fauna into new habitats, including the waters surrounding Tasmania. *Centrostephanus rodgersii*, the long-spined sea urchin native to NSW rocky reef ecosystems, is an invasive species in Tasmania. It has devastated Tasmania's giant kelp forests, with knock-on impacts on Tasmania's abalone and rock lobster populations. The destruction caused by long-spined sea urchins is

¹ [Introduction of the Biosecurity Protection Levy: Consultation Paper](#)

² [Fisheries and aquaculture statistics 2021 | DAFF](#)

³ Seafood industry work profile | TSIC

⁴ [White Spot Disease in Australia up to 2017: a chronology | Parliament of Australia](#)

controlled, and in some cases reversed by collaboration between industry, research, and government.

Levy complexity for a complex industry

Farmed prawns are the only Australian seafood with an existing levy structure. The levy is based on the weight of unpeeled prawns. It has an FRDC component as well as a white spot disease repayment component.⁵

With only one example of a seafood levy, TSIC has no understanding of how a similar levy would or should be applied to other seafoods. Seafood, notably wild catch, is a very complex industry, with complex ownership ITQs. TSIC asks who will pay the levy? The fisher who makes the catch, or the quota owner who licenses its use?

How would a levy be managed across fisheries? A set rate per kg of production is untenable as production costs for different seafood species vary considerably. High production costs may or may not be reflected in high profit margins.

TSIC notes that the seafood sector is unique in its complexity and in its demographics of potential beneficiaries to Australia's commitment to biosecurity. With a large recreational fishing community, it is unreasonable to expect commercial fishers to shoulder all the financial burden for Australia's seafood biosecurity. How will a levy be enforced within Australia's extensive recreational fishing community?

With a need to levy different fisheries at different rates and on different criteria, TSIC asks whether the administrative complexity of such a system will mitigate against any potential benefits?

Further consultation welcomed

DAFF's consultation paper on the Biosecurity Protection Levy notes that *industries with commodities not subject to statutory levies will be subject to further consultation*. TSIC welcomes this opportunity for further consultation, noting that there has been none to date, as this will be necessary before we can provide greater detail to the questions posed.

⁵ [Farmed prawns levy and charge | DAFF](#)