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13 October 2023

Department of Agriculture, Fisheries and Forestry  
Biosecurity Sustainable Funding Implementation Branch

Agriculture House  
70 Northbourne Avenue  
CANBERRA 2601

Cc: [minister.watt@agriculture.gov.au](mailto:minister.watt@agriculture.gov.au)

**RE: APL Submission to the Introduction of the Biosecurity  
Protection Levy: Consultation**

Dear Biosecurity Sustainable Funding Implementation Branch,

Australian Pork Ltd would like to thank you for the opportunity to provide a submission on the Introduction of the Biosecurity Protection Levy: Consultation.

**Australian Pork Ltd**

APL is the peak national representative body for Australian pork producers. It is a producer-owned company combining marketing, export development, research and innovation and strategic policy development to assist in securing a profitable and sustainable future for the Australian pork industry.

The domestic pork industry is a vital part of Australia's food supply chain, with pork the second most consumed meat in Australia and all fresh pork consumed in Australia domestically sourced. In 2022/23, the Australian pork industry produced 453,426 metric tonnes of pork. The largest volume of production is sourced from Queensland, Victoria and South Australia from an Australian domestic commercial sow herd, as at 1 July 2023, of 285,538 sows.

The Australian pork industry contributes around \$5.5 billion in gross domestic product to the economy and supports a diverse range of careers across the food supply chain. The industry is domestically focused with around 90% of our production supporting food security for Australians. The value of the 10% exported in 2022/23 was around \$182 million.

More than 31,000 jobs are supported by the industry nationally, predominantly in regional Australia, supporting the economic and social prosperity of communities and the wellbeing of individuals. The Australian pork industry's workforce is skilled, specialised and generally engaged on a permanent basis.



Like many rural industries the pork industry continues to be impacted by staff shortages and high grain prices with the industry still willing and able to support more than 36,000 jobs nationwide and opportunity for growth up to 38,000 as Australian pork replaces imported pork in the domestic production of smallgoods.

APL holds a number of roles on behalf of the Australian pork industry. APL is:

- The pork Research, Development and Extension organisation leading biosecurity, climate research and extension in partnership with the Australian government and the research community,
- The marketing arm of the Australian pork industry managing national campaigns such as “Get some pork on your fork” and the Valuable Provenance campaign raising awareness of how to support the growth of high-quality Smallgoods made from Australian pork,
- The peak body for the Australian pork industry, representing pork within the National Farmers’ Federation (NFF) and other representative frameworks,
- Leading the pork industry’s Sustainability Framework implementation,
- Part of the sector-wide collaborative effort to develop Australian Agricultural Sustainability Framework, coordinated by the NFF on behalf of the Federal Department of Agriculture, Fisheries and Forestry (DAFF), and
- The industry signatory to the Emergency Animal Disease Response Deed (EADRA).

## **Biosecurity Funding: Principles and expectations**

***When considering the Biosecurity Protection Levy (the Levy), APL is providing comment on behalf of our pig producer levy payers across rural and regional Australia.***

APL continues to invest in research and extension to ensure the pork industry is able to continually improve biosecurity practices on farm and across the supply chain. The Australian pork industry has invested millions on farm and through the supply chain to support enhanced biosecurity preparedness as well as ensure the industry has an embedded response capability and capacity.

When considering any changes to funding biosecurity responsibilities, it is important the considerable contribution towards biosecurity made both on farm and within industry is recognised. The Australian pork industry already provides significant funding towards many elements of current biosecurity activity:

- APL annually invests significant producer levies in biosecurity research which supports APIQ✓®, PigPass, Exoflare Visitor and Exoflare Transport in addition to on-farm biosecurity planning, development and adoption of the Option C/Voluntary Enhanced Biosecurity Standards for African swine fever (VEBS-ASF). An explanation of programs is provided in Appendix A.



- APL is signatory to EADRA and therefore contributes core annual funding to Animal Health Australia (AHA) and also provides additional funding for pork industry specific projects.
- APL provides support and assistance for core AHA activities such as the development of AUSVETPlan manuals, the review of EADRA and other AHA activities designed to support preparedness and increase on-farm and across industry adoption of biosecurity mechanisms.
- The broader Australian pork industry has invested millions in supply chain and processing technologies which support the highest levels of biosecurity. The industry is proactively investing in the infrastructure required to implement Abattoir Transport Biosecurity Systems (ATBS).
- In addition to funding their on-farm activities and infrastructure, pig producers also contribute towards the government biosecurity responsibilities funded through general consolidated revenue through their payment of a range of State/Territory and Federal taxes (income tax, pay roll tax, GST, Stamp duty, rates etc) which supports government contributions towards biosecurity activities and the normal commitments government is responsible for under the EADRA and EPPRD deeds.

### **Consultation: Regulatory Impact Statement**

APL recognises, and has supported, the need for sustainable funding and supports shared responsibility. However, the Introduction of the Biosecurity Protection Levy: Consultation contains a number of provisions which APL believes require additional consideration.

It would be appropriate for the Levy to be tested through the process of undertaking a full Regulatory Impact Statement (RIS) process. Expanding the consultation process to include a RIS would allow a comprehensive examination of the structure and implementation of the Levy.

**APL Recommendation: APL would support the undertaking of a full Regulatory Impact Statement (RIS) process to properly assess the proposed structure and implementation of the Biosecurity Protection Levy.**



## Shared responsibility

***There was an opportunity during the process to acknowledge the millions of dollars agricultural industries already contribute towards prevention activities such as biosecurity surveillance and preparedness.***

APL supports a funding model which highlights the importance of risk creators paying a measurable share of the costs to minimise the risks they create. As the risk creators, they should provide a significant contribution towards the “shared responsibility” funding of:

- Border protection activities,
- Surveillance,
- Preparedness, and
- Incident Response activities.

in recognition of their role as risk creators and the most likely pathway for the introduction of pests and diseases.

We consider it important that funding models in principle be robust, resilient, sustained and not dependent on budget cycles or priorities of the government of the day. Funding needs to:

- Reinforce the systems-based focus centred around science-based biosecurity risk analyses. Given the importance of risk analyses to both preparedness and surveillance/prevention activities, clear review cycles that ensure the risk profiles remain fit for purpose must be established, with the Australian agricultural industries actively included.
- Demonstrate that the Governments contributions towards biosecurity activities are in line with the strategies and expectations developed in collaboration with industry, such as the National Biosecurity Strategy and AnimalPlan.
- Be established through ongoing open and rigorous consultation processes.
- Be coupled with transparent reporting mechanisms to ensure the allocation and utilisation of funding is fair, efficient and addresses the gaps and needs identified by prior industry and government consultation processes.

## The Levy

***The Levy does not meet the established and well understood principles of levy imposition or collection. It should therefore be referred to as a tax or excise.***

APL acknowledges the importance of the Federal Government being able to meet its commitments to biosecurity activities. However, despite outlining that the Levy will not be established under the existing agricultural levies framework, there are enough links back to the levies framework that it creates the opportunity for confusion and frustration for the farmers who will see this as an additional levy.



By referring to the mechanism as a “levy” it has created an implication for producer levy payers that the levy will be collected and utilised as per the current well understood and respected Research and Development levies. There is potential for producers to therefore expect the levy to be utilised under parameters similar to those used to establish the current agricultural Research and Development (R and D) levies.

However, the levy will not fall under, nor meet, any of the established levy imposition and collection principles<sup>1</sup>. The consultation paper acknowledges that there would be no opportunity for producer levy payers to influence the use of the levies or even to hold government to account to ensure their industry was getting a return on its “levy” investment.

Continuing to refer to it as a levy is inappropriate. It should be openly and transparently advocated for as a necessary budget measure rather than in any way being linked in any way to our highly respected R and D levy system.

## **The Levy calculation**

***The Biosecurity Protection Levy calculation should be solely based on an industries Research and Development levy or an equivalent value for those industries that have not established a levy system.***

The quantum of the Levy is directly linked to the amount to be collected as 10% of 2020-21 agricultural levy contributions. In addition to again reinforcing the expectation that this is a levy similar in form and function to the agricultural R and D levies, basing the quantum of the levy on a percentage of levy rates creates inequity for those industries that have voluntarily agreed to pay additional levies to undertake marketing or biosecurity activities.

The pork industry levy is \$3.425 comprised of:

- Marketing \$2.25 per head
- Research and Development \$1.00 per head
- National Residue Survey (NRS) 17.5 cents per head

APL believes it creates inequity across the commodities for the biosecurity protection levy to be based on levy collections which incorporates anything beyond the R and D levy. The decision also creates unnecessary complexity for those industries that do not have an established levy.

**APL Recommendation: That the pork industry be granted an exemption from paying a biosecurity protection levy on the component of our levies related to Marketing and NRS. The calculation should be based solely on the R and D levy component of our levies.**

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<sup>1</sup> 2020, Levy guidelines: How to establish or amend agricultural levies, Department of Agriculture, Fisheries and Forestry.



## Recognition of Industry Biosecurity investment

***There is an opportunity to ensure the Levy is implemented and managed to support the already significant industry investment in biosecurity.***

The pork industry prioritises animal health and welfare and has a recognised leadership position on biosecurity. Our focus and substantial investment in biosecurity as an industry is due to the range of diseases which pigs are susceptible to and the close proximity of a number of high impact emergency animal diseases in countries neighbouring Australia.

The Australian pork industry has been actively involved in collaborating with broader industry, government agencies and research institutions, to work together on biosecurity preparedness activities, surveillance, disease mitigation and prevention measures.

Following the lessons learned during the pork industries preparation for the African swine fever (ASF) threat and our experience in responding to the Japanese encephalitis virus (JEV) in 2022, additional on-farm and across supply chain biosecurity activities have been supported by APL and implemented with significant additional investment by the industry.

APL would support actions being undertaken to ensure the Levy supports and builds on the substantial good will and collaboration between industry and State/Territory and Federal governments within the biosecurity space. Consideration must be given to ensuring the Levy does not reduce availability of or remove incentives for industry funding to support industry specific activities which would have a long-term measurable biosecurity benefit.

Examples of the significant contributions towards biosecurity being made by APL and the Australian Pork industry:

- Working with government agencies, research institutions, and experts in biosecurity by being an active member of Animal Health Australia (AHA). AHA brings together industry and governments in a formal way which helps all parties understand the current biosecurity threats, the management challenges and the opportunities available to ensure collective preparedness. Collaboration has strengthened the connections between different agricultural sectors across both the plant and livestock industries along the supply chains from pig farms to international borders. This is critical so we are able to adequately respond to future biosecurity threats.
- Supporting state-based biosecurity system and advocating for a broader cross local and state government approach that includes important areas like health, regional development, community services and tourism. This approach is known as 'One Health' or 'One Biosecurity.'
- Partnering with different groups in the livestock sector through initiatives like AnimalPLAN and the Animal Health Australia Industry Forum Working Group (Emergency Animal Disease). This collaboration has opened communication and supported the mechanisms which allow industries to work better together.
- Working with Animal Health Committee and sharing our industry expertise in biosecurity practices specific to pig farming and pork production. This was especially clear during the JEV outbreak and during the development of the Voluntary Enhanced Biosecurity Standards for African Swine Fever (VEBS for ASF).



- Collaborating with other industries to share experiences, best practices and research findings. This helps dissemination of information and supports industries to understand different approaches available when considering biosecurity management opportunities.
- Supporting the pork industry to broaden producers, members and stakeholders' knowledge about biosecurity measures. This includes delivering information campaigns and workshops to spread knowledge about actions that can be taken to better protect against biosecurity risks.
- APL was selected by the Commonwealth Government in December 2019 to deliver the National Feral Pig Management Coordinator Program. This program has established strong partnerships across all States and Territories, Natural Resource Management agencies, Indigenous organisations and non-Government agencies to enable the implementation of the *National Feral Pig Action Plan 2021-2031*. This program has commenced its second phase, with Commonwealth funding until 30 June, 2025.
- The National Feral Pig Management Coordinator Program has built relationships with Wildlife Health Australia to support their strategic vision and initiatives to increase Australia's capacity to protect and promote wildlife health and increase awareness of wildlife health, One Health and ecosystem health. Consistency in collaborative governance arrangements across State and Territory biosecurity systems is advocated to optimise stakeholder knowledge and adoption of biosecurity requirements and compliance.

APL supports a range of collaborative activities and recognises the change in how governments consider biosecurity, with a focus on shared responsibility, partnerships and the need for sustainable investment. APL and the Australian Pork Industry remain firmly committed to strengthening on-farm biosecurity through proactively future proofing the industries surveillance, preparedness and response capabilities.

APL acknowledges Government's commitment to biosecurity and recognises the range of activities underway to protect our borders and proactively strengthen Australia's biosecurity protection measures. APL is committed to working with Government to improve the implementation of a funding mechanism which addresses industry needs, promotes collaboration and addresses the need for sustainable funding of biosecurity responsibilities, surveillance and preparedness activities.

Please don't hesitate to contact Tanya Pittard, General Manager Policy and Industry Relations on 0484 740 613; [tanya.pittard@australianpork.com.au](mailto:tanya.pittard@australianpork.com.au) for further information.

Yours sincerely,



Margo Andrae  
Chief Executive Officer



## **Appendix A: Further information about pork industry biosecurity initiatives**

APL annually invests significant producer levies into biosecurity research which supports improved biosecurity outcomes for the industry. APIQ✓®, PigPass, Exoflare Visitor and Exoflare Transport in addition to on-farm biosecurity planning, development and adoption of the Option C/Voluntary Enhanced Biosecurity Standards for African swine fever (VEBS-ASF) are just some of the examples of proactive biosecurity activities undertaken by APL and the Australian Pork industry.

### **APIQ✓®**

The Australian Pig Industry Quality Assurance Program (APIQ✓®) is the industry's nationally recognised and independently audited quality assurance program — covering 91% of Australia's sow herd. APIQ✓® standard has seven core modules, including a module emphasising biosecurity management. Producers are provided with the opportunity to familiarise themselves with the types of additional biosecurity measures governments may expect in the event of an emergency animal disease incursion.

### **PigPass**

PigPass is the national traceability system which provides information on the movements of pigs in Australia. The industry led development of PigPass by Australian Pork Limited (APL) in early 2000s and integration with the National Livestock Identification System (NLIS) in 2016. PigPass complies with NLIS Pig Standards to ensure traceability of pigs for disease control and food safety purposes. It underpins industry and government's ability to respond to an emergency animal disease incursion.

PigPass is a consignment (mob) based livestock traceability system covering the pig production system from property of birth to the point of slaughter, and all movements in between.

PigPass links pigs to a property of origin using a Property Identification Code (PIC), registered pig identification (ear tags and/or tattoos), and pig movement documentation (PigPass National Vendor Declaration (NVD)). A PigPass NVD form must be completed when pigs are moved from properties. The PigPass system applies to everyone who owns a pig, in order to meet state and territory government traceability legislative requirements. Australian Pork Limited (APL) maintains a contractual arrangement with Integrity Systems Company to support data from PigPass, which APL manages, to be transferred into NLIS at the point of collection.

### **Option C/Voluntary Enhanced Biosecurity Standards for African swine fever (VEBS-ASF)**

Working closely with the Animal Health Committee during 2022, the Australian pork industry collaboratively designed the 'Voluntary Enhanced Biosecurity Standards for African Swine Fever' (VEBS-ASF) to minimise the threat of ASF in the pig sector. VEBS-ASF on farm should support business continuity through the movement of live pigs and semen in the event of an ASF outbreak.



In late 2022, APIQ✓® included the VEBS-ASF as a new voluntary audit and support option for pig producers who want to demonstrate compliance with the VEBS-ASF. A piggery can be VEBS-ASF verified if they are APIQ✓® certified and met the VEBS-ASF standard and performance indicators. This includes standards for traceability of trucks and visitors to the property.

Traceability has been facilitated by innovative technologies (Exoflare visitor and Exoflare transport apps) invested in by Australian Pork Limited to reduce biosecurity risks on farms and improving information flow.

The pork industry continues to work collaboratively with jurisdictions to better understand governments' emergency animal disease requirements and considers industry programs, such as APIQ✓® VEBS-ASF, as a key mechanism to demonstrate the pork industry's commitment to biosecurity and preparedness activities. The collaboration between governments and the pork industry is an example of how delivery of the NBS can further encourage the development of practical on farm biosecurity which has positive supply chain, economic and social implications.

### **Exoflare Visitor and Exoflare Transport apps**

APL has invested in the creation of innovative technologies aimed at reducing biosecurity risks on farms and improving information flow. This includes the Exoflare visitor and Exoflare transport apps which were developed from two pilot programs, outlined below.

The Exoflare visitor app for on-farm biosecurity is an easy-to-use digital record of all people movements onto properties to assist in preventing and tracing diseases.

Exoflare Transport app further extends traceability and enables consignment notes on the go.

### ***Exoflare Pilot programs: visitor and truck biosecurity***

ExoFlare commenced the ExoFlare Visitor early access program from May 2021. The Exoflare Visitor risk assessment tool was successfully deployed at 107 sites from 20 different organisations across 5 states. On an average, more than 2000 visitor risk assessments per month were carried out before allowing the entry of visitors in the farm premises. This tool is also used to assess the biosecurity risks posed by delivery check in and drivers (average more than 700 risk assessments per month across all sites).

This deployment has enabled:

- Consistent evaluation of visitor risk, with decision support for farm staff making risk assessments
- Time-savings by replacing paper forms and manual processes with an easy-to-use and device-accessible web app
- High-level insights and appropriate mitigation measures to better manage biosecurity risks
- Electronic data capture for record-keeping, reporting and contact tracing

The ExoFlare Transport project extended and applied the lessons learned from the ExoFlare Visitor project, with the Transport pilot study run in collaboration with pork producers, transporters, and processors. Transport vehicles are a significant source of biosecurity risks



for farms. The pilot sought to demonstrate whether and how the collaborative use of data and GPS tracking could help the industry in five areas:

1. Identifying and managing biosecurity risks
2. Supporting animal welfare practices and monitoring
3. Implementing zoning and compartmentalisation to protect market access and business viability
4. Identifying and capturing operational efficiencies
5. Speeding the generation and provision of records to regulators in EAD outbreak situations.

Insights gathered through this research revealed value in ExoFlare supporting improved emergency animal disease outbreak movement permits and route verification in the future.