



# **Submission to the Introduction of the Biosecurity Protection Levy: Consultation Paper**






## OPENING COMMENTS



We welcome the opportunity to provide feedback to the Department's Biosecurity Protection Levy (BPL) Consultation Paper.






Australia's biosecurity system is fundamental to the success of Australian agriculture, the health of our natural environment and to our society and economy at large. It is imperative that Australia's biosecurity system is innovative, adequately resourced and operates effectively.

Our members do not object to the BPL on the basis of simply not wanting to contribute more to the biosecurity systems and remain committed to exploring opportunities to invest in actions that deliver tangible and additional biosecurity outcomes.

 opposes the proposed Biosecurity Protection Levy, given significant issues regarding:

- Its inconsistency with established levy imposition and collection principles;
  - The transparent use of the collected funds to deliver dedicated, additional and tangible biosecurity outcomes;
  - The lack of recognition of existing producer contributions to the biosecurity system; and
  - The need for increased contributions from risk creators, including containerised imports.
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. We represent the interests of around 1000 voluntary members, equating to roughly 98% of Australia's  Our main objective is to provide our members with strong and effective representation on issues affecting the viability of their businesses, their communities and their industry.

   
  
  
 We operate as a member-based not-for-profit incorporated association, governed by a grower elected board. Our members direct us in all of the policy

and advocacy work that we do. They were instrumental in formulating the views and opinions put forward in this submission.

██████████ aims to deliver policy-based advocacy for our members, focusing on three key areas: (i) water; (ii) productivity and industry affairs; and (iii) environmental sustainability.

One of the main factors influencing the viability of our members' businesses, their communities and their industry is the superiority of ██████████ marketing arrangements in NSW. ██████████ are driven to ensure the ██████████ marketing arrangements deliver the best possible return to growers.

### **Transparent use of the collected funds**

██████████ notes the brief reference in the Consultation Paper to transparent use of funds:

*"The Government has committed to greater transparency and accountability around the strengthened and sustainably funded biosecurity system. This will include publishing information annually on biosecurity funding, expenditure and outcomes, including revenue from the Biosecurity Protection Levy".*

Transparency is vital to delivering a genuine partnership approach with the agriculture sector. The industry, however, holds concerns about the Department's capacity and willingness to deliver such reporting. The National Biosecurity Strategy identified increasing the transparency of biosecurity funding<sup>1</sup> as a 'priority' action. Yet over 12 months on from the release of the document, outside of high-level inbound collection information contained in the budget documents, such transparency has not been delivered. We urge the Government to do this as a priority.

### **Inconsistency with established collection principles**

The proposed levy does not accord with long-agreed levy establishment principles, such as those outlined in the 1997 'general principles applying to proposals for new and amended primary industries levies and charges' as contained in the Department's levy establishment and amendment guidelines.

The proposed policy contains a structural linkage to the existing framework with respect to the amount to be collected. Linking the amount to be collected as 10% of 2020-21 agricultural levy. All ██████████ pay a \$6.00 per ton ██████████ levy managed by Agrifutures. ██████████ levy payers agreed to doubling this levy several years ago to fast track productivity improvements. Imposing a 10% increase to this levy to contribute additional funds to biosecurity protection will place an unfair impost on ██████████

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<sup>1</sup> 2022, National Biosecurity Strategy, Department of Agriculture, Fisheries and Forestry, pg. 8.

Other commodity levies are priced at different levels to meet the different needs of their industries. In addition, the quantum of the levy paid by individual farmers varies with the number of producers in each production sector.

It is imperative that any linkage of biosecurity funding to primary industry levies is in accord with the established levy principles, including equity and accountability to those producers subject to it.

### **Lack of recognition of existing contribution**

Currently levy payers contribute to Plant Health Australia for response to threatened species incursions. In addition, growers contribute hundreds of labour hours and many thousands of dollars into biosecurity monitoring, pest species control and eradication.

This massive contribution must be noted when considering any increase in contribution from the

### **Need for increased contributions from risk creators**

The agriculture sector is a significant 'risk bearer'. While recognising we do not operate in a zero-risk environment, primary producers often bear more of the cost of biosecurity failures than stakeholders such as importers. The acute costs of a pest and disease response and impacts can the impacts pose an extraordinary burden on industry. For example, the most contemporaneous studies have found a major outbreak of foot and mouth disease in Australia could cost up to \$80 billion, \$16 billion for Khapra beetle and \$5 billion for Varroa mite.

Decades of reviews have identified that risk creators, such as importers, have a clear responsibility to contribute commensurate with their risk profile. As noted in the Craik review:

*"Much of the material of concern to the national biosecurity system, including of environmental concern, arrives via vessels and containers—either in the contents of the container or on the external surfaces of the container itself".*

believes that biosecurity risk creators must contribute to Australia's Biosecurity management at a level commensurate to the level of risk they create.

### **Conclusion**

urges the Department to recognise concerns of the overwhelming majority of our members outlined in this submission.

We are committed to pursuing improved resourcing of the biosecurity system and are prepared to consider an equitable approach to resourcing biosecurity protection in Australia.

