

CONSULTATION SUBMISSION

Biosecurity Protection Levy

Introduction

████████████████████ are the peak organisation for ██████████ representing nationally registered ██████████ across Australia, who in turn provide ██████████ and other services to the ██████████ both here and overseas.

████████████████████ is world renowned its quality ██████████. There is a strong future with many significant opportunities and benefits to the Industry, Australia and even the planet because of the eco-friendly and sustainable nature of ██████████. But the Industry has been in decline due to the relentless number of challenges from so many angles and 2024 will be no exception to these pressures on producers.

Australia's biosecurity is of great importance to the success of the ██████████ and that of all producers, plus the entire country.

████████ are deeply concerned at the manner in which this new levy is being imposed. Not only does the levy not meet the Department of Agriculture's own requirements for being a levy - it appears to fit more with a tax – it also unfairly singles out producers to pay for the levy. The government's consultation and research should have taken place well before announcing the levy, rather than after, to fully understand the consequences for producers.

Feedback

In principle ██████████ does not support the introduction of the new biosecurity levy on producers. All of Australia benefits from robust biosecurity not just producers. Producers, in particular ██████████ producers, are already contributing significantly to Australia's biosecurity (both in actions and funding) and this is in the face of many other ongoing external/environmental challenges. It is not producers causing the major risks to this country. The Government should consider more closely the importers and the actions of the general public/people travelling into the country who are the constant ongoing risk to this country and our commodities.

This new revenue raising scheme should not single out producers for the following reasons:

- 1) Producers are not the only cause of biosecurity risks and issues in this country. There are many more risks caused by different industries, business and people from all walks of life. So many in fact that there are long running television documentary series such as "Border Security" to highlight this. There is also a display at the Melbourne Museum in the "Quarantine Room" of different flora and fauna that arrives in the country. <https://museums.victoria.com.au/article/forbidden-objects-in-the-museums-collection/> (Downloaded 9/10/2023)

Recent examples of how biosecurity risks are caused by other industries include:

- a. The Indonesian Foot and Mouth Disease (FMD) outbreak is at risk of coming into the country via imported meats (Importers and food manufacturing industry) and on tourists' shoes, so footbaths were put into airports (Tourism industry)
- b. The Bee mite, according to DAFF was most likely to have arrived in Australia via "*infested bees that have stowed away on ships and boats*" (Import Industry) <https://www.agriculture.gov.au/biosecurity-trade/pests-diseases-weeds/plant/bees> (Downloaded 5/10/2023)

- 2) It's not producers that are causing the major biosecurity risks in this country, but producers are often the frontline victims of outbreaks. The concept that producers alone should pay this levy because they would be the "beneficiary" is just not right. Any producer that has to go through an outbreak would not consider themselves a beneficiary of anything except heartache, stress and years of hard work to rebuild destroyed [REDACTED], through no fault of their own. In the [REDACTED] Industry it takes years to build up the right genetics.

Producers are not the only victims of biosecurity outbreaks. The loss of [REDACTED] means the loss of important commodities for the country. Other victims or "beneficiaries" include the entire supply chain, communities that depend on the industry, plus consumers being hit with higher prices and shortages.

In addition, Australia's native flora and fauna, as well as pets and gardens can be affected depending on the outbreak.

If we go back to the FMD and bee mite examples above:

- a. FMD, if it was to get into the country, will impact abattoirs, supermarkets and consumers
 - b. Bee mite will impact both commercial and hobbyist bee keepers with likely permanent ongoing added work and expenses for those that can continue on. Higher costs affect producers and consumers. Plus according to the CSIRO viruses spread by the mite can spill over into native bees. (<https://www.csiro.au/en/news/all/articles/2022/july/expert-commentary-varroa-mite#:~:text=Does%20Varroa%20mite%20affect%20native,spill%20over%20into%20native%20bees> (Downloaded 5/10/2023)) This could mean our native flora is affected also.
- 3) It appears the revenue raised by this levy will go into consolidated revenue. This means there is no guarantee that the producers impacted by outbreaks will be the beneficiaries of the levies they pay.
- 4) Looking more specifically at our own Industry:
- a. [REDACTED] will be taxed twice with this new levy for both [REDACTED]
 - b. It is totally unfair that the levy has been based on 10% of the 20/21 transaction year when prices have fallen by more than 50% this year. Just because a [REDACTED] costs \$50 a kg in the supermarket does not mean the producers are getting that much for selling their [REDACTED]. Some producers already this year have found it easier to shoot their [REDACTED] rather than take on the cost of getting them to market to sell them for much less than the cost of transporting them there. [REDACTED]
 - c. [REDACTED] are already paying a levy on the [REDACTED] they sell in order to fund industry research, development and marketing activities. The new biosecurity levy may will affect producers' ability to fund the pre-existing [REDACTED] levy at a rate that enables it to continue with important industry R&D and marketing initiatives.
 - d. [REDACTED] and other agricultural producers are currently already paying compulsory levies and taxes to help fund Australia's biosecurity system, both at a state and federal level.
 - e. Compulsory electronic identification tags to help the traceability of stock is currently being rolled out across the country. This is yet another cost to producers, but it has a huge benefit to help manage Australia's biosecurity (Hence the government is funding some of the roll out of these tags)

- [REDACTED]
- f. The Industry and producers have created on-farm biosecurity measures to protect their own produce/stock.
 - g. [REDACTED] was already in discussions regarding a proposed Emergency Animal Disease Response Levy. This was Industry finding its own way to protect itself and the country. The key to this proposal was that ALL the funds would go directly into protecting those that funded it. Industry bodies would contribute a certain amount of funds initially and producers would then pay levies in the event of an outbreak. Industry and producers have peace of mind that the funds they put in will be allocated to the [REDACTED] Industry. This has been put on hold due to the new biosecurity levy.
 - h. The current El Nino forecast into 2024 has seen significant [REDACTED] on top of the [REDACTED] that has occurred due to the [REDACTED]. Already this Spring the country has faced both fires and floods and droughts in different parts of the country. All of which put great pressure on producers. Now add a new biosecurity levy and that will really put our producers in even more financial stress in a drought year.
 - i. The proposed format of this Levy could be a disincentive for producers to continue in an already complex, costly and challenging environment as seen from the examples above.
 - j. Please refer to submissions by other peak organisations [REDACTED] [REDACTED] for more detailed information about the impacts of this new levy on the [REDACTED].

5) According to the Department of Agriculture:

"Biosecurity is everyone's responsibility. Looking out for unusual pests, weeds or diseases can help. Our environment and agriculture rely on our biosecurity system to be strong and resilient to safeguard our economy, cultural heritage and way of life from exotic species."

[REDACTED]

Recommendations

1. All producers, particularly [REDACTED] should be exempt from this new biosecurity levy, as they already contribute significantly to the country's biosecurity measures.
2. Government should look at other industries and opportunities to fund Biosecurity rather than targeting producers who are already contributing significantly. Biosecurity is everyone's responsibility, therefore acquiring the funds to help facilitate a strong and resilient biosecurity system should be everyone's responsibility.
3. Funds raised for Biosecurity must ALL be directed to stronger more resilient biosecurity measures and not put into consolidated revenue.