



Australian Barramundi Farmers' Association

Submission on the design and
implementation of the
Biosecurity Protection Levy.

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Australian Barramundi Farmers Association

ABFA is the peak representative organisation for the Australian farmed barramundi industry. We exist to facilitate the profitable and sustainable development of the Australian Farmed Barramundi industry.

Our members operate in every mainland State and the Northern Territory. With farm gate sales estimated at \$125 Million in 2022-2023, the Australian farmed barramundi sector is enjoying sustainable growth and is on track to be a \$200M industry by 2025, providing economic opportunities for regional Australia. Almost all farmed barramundi produced in Australia is consumed domestically.

ABFA is a member of Seafood Industry Australia, and part of the Australian seafood industry which is valued at more than \$3.5 billion and supporting more than 17,000 Australian families directly (ABARES, 2021) and thousands more downstream in logistics and sales.

Executive Summary

The Australian Barramundi Farmers Association (ABFA) welcomes the opportunity to make a submission on the design and implementation of the Biosecurity Protection Levy.

We support the government's focus on biosecurity where that means positive outcomes for Australian agriculture, forestry, and fisheries sectors, but we do not support application of a commodity or species-based levy at this time for the following reasons:

1. The seafood industry's risk and beneficiary profiles are complex and vastly different from those of terrestrial sectors.
2. The ABFA has low confidence that with current biosecurity controls, the Australian Government is failing to meet its legislative responsibility, primarily at the border, to manage biosecurity risks for our sector.
3. The proposed levy model offers a poor value proposition to members, lacking clear outcomes to reduce and better manage the risks to our sector from imported products.
4. Given the complexities of the seafood industry, setting up fair and equitable levy rates, collection points and structures for the seafood sector by the government's deadline of 1 July 2024, will be extremely difficult and this is a significant concern for industry.

In summary, the proposed levy model offers a poor value proposition to our members, and we urge that:

- A mechanism and timetable for meaningful consultation with ABFA and the broader seafood industry and its supply chain partners is needed be established, and
- the 1 July 2024 deadline is accordingly deferred.

ABFA Response to the proposed Biosecurity Levy consultation paper

1. The seafood industry's risk and beneficiary profiles are complex and vastly different from those of terrestrial sectors.

The Biosecurity Protection Levy model is built on the premise that the people paying the levy are the primary beneficiaries (and potential risk creators) of that protection and investment. The seafood industry's risk profile is vastly different to terrestrial sectors.

With close to 70% of seafood products being imported, this means one of our main risks arises from imported product. Our fishers and aquaculture producers have no control over this risk, it lies solely with the government's border enforcement policies and services.

The consultation document states that *Due in part to the considerable biosecurity prevention efforts at the border, we continue to be one of the few countries in the world that remains free from many of the world's most invasive pests and diseases*, yet Australian fisheries have been significantly impacted by disease incursions affecting finfish and shellfish. Some examples include:

1995

- Mass mortalities of pilchards devastated the fishery in Southern Australia that was subsequently identified to be caused by the Pilchard Orthomyxovirus that now causes substantial problems for farmed Atlantic salmon in Tasmania.

2005

- Mass mortality of abalone caused by Haliotis Herpes Virus devastated the fishery and abalone farms in western Victoria and has reoccurred in the fishery in 2021.

2010

- The Pacific Oyster Mortality Syndrome (POMS) was discovered in the Georges River, Sydney.

2016

- POMS spread to Tasmania, where it devastated the oyster farming industry and indirectly caused major loss of production in the South Australian oyster farming industry.
- White spot syndrome virus (WSSV) was identified on prawn farms in Moreton Bay.

2022

- WSSV reported in Northern New South Wales.

Each disease incursion episode has been devastating and has demonstrated the challenge for eradication of aquatic biosecurity threats. The National Priority List of Exotic Environmental Pests, Weeds and Diseases (EEPL) identifies 168 exotic species of significant environmental risk with a third of the list relating to aquatic environments (DAFF, 2022).

Pre-border and border biosecurity is the most cost-effective approach to minimise risks and impacts of aquatic diseases and parasites.

The beneficiary profile associated with seafood is also very different. With a couple of notable exceptions, the Australian aquaculture industry is founded on native species. Barramundi is an important native species for Indigenous livelihoods, tourism, commercial and recreational fishing, and is a key species within freshwater and coastal ecosystems across northern Australia. Importantly and uniquely, once a disease is in

the aquatic environment, it is highly unlikely that it can be controlled.

In summary, both the risk and beneficiary profiles for aquatic species are complex and vastly different to the terrestrial sector.

2. The ABFA has low confidence that with current biosecurity controls, the Australian Government is failing to meet its legislative responsibility, primarily at the border, to manage biosecurity risks for our sector.

The consultation document states that *the Australian Government has a legislative responsibility, primarily at the border, to manage biosecurity risks to protect Australia's animal, plant and human health status and to maintain market access for our food and other agricultural exports.*

The ABFA holds grave concerns that Australia's current biosecurity risk mitigation measures are inadequate to provide an appropriate level of protection for our industry. ABFA and its members are extremely concerned that current BICON import risk mitigation measures are not adequate to provide appropriate level of protection to the barramundi farming industry. ABFA has raised these concerns repeatedly over the last decade and continues to generate further evidence to support this assessment.

Australia's biosecurity measures to manage import biosecurity risks are largely formed using the 23-year-old 'Import Risk Analysis on Non-viable Salmonids and Non-salmonid Marine Finfish' (1999 IRA). In 2021, the Commonwealth undertook a review of the risk species lists for importation of non-salmonid finfish for human consumption and baitfish. In developing our submission, we commissioned an independent expert review, which identified additional pathogens considered to cause disease in barramundi that were not considered by the Department of Agriculture and Water Resources in the review of risk species. These include (but are not limited to) Scale Drop Disease Virus (SDDV), Infectious Kidney Necrosis Virus (ISKNV), Turbot reddish body iridovirus (TRBIV), Singapore grouper iridovirus (SGIV), and Lates calcarifer Herpes Virus (LCHV).

There are currently NO mandatory requirements to decontaminate (e.g., cook) imported barramundi (and other non-salmonid finish species) or processing wastes (gills, guts, or frames), which may contain exotic diseases, disease risks, prior to or upon entry into Australia.

There is currently NO routine post-border testing program in place on imported uncooked whole and head-on-eviscerated barramundi and non-salmonid commodities, to confirm the absence of exotic diseases in these commodities, prior to or upon entry into Australia.

There is currently NO routine compliance assessment of imported uncooked head-on-eviscerated barramundi or non-salmonid finish, to confirm the imported commodities match current BICON import requirements (e.g., to confirm the species is correct, fish size is correct, commodity type is correct, level of processing is correct).

There are currently NO effective measures in place that prevent further processing of imported uncooked whole and head-on-eviscerated barramundi and non-salmonid finfish, whereby an unmanaged waste stream can be created.

There are currently NO effective measures in place to decontaminate processing wastes generated from further processing of imported uncooked barramundi and non-salmonid finfish, to prevent it being discarded or released into natural waterways as bait, berley, or otherwise disposed of.

There is currently NO testing method to determine country of origin or differentiate between farmed and wild-caught finfish commodities. Thus, there remains a pathway for product substitution of aquaculture commodities that cannot be confirmed in imported product or prevented through testing and compliance activities.

In 2021, the Fisheries Research and Development Corporation (FRDC) and ABFA published the final report from project 2019-126 "Assessing the biosecurity risk of imported uncooked, whole and head-on eviscerated, barramundi and non-salmonid finfish in relation to exotic viruses". The work was undertaken by Future Fisheries Veterinary Service (FFVS) and the University of Sydney Farm Animal Health Infectious Diseases

Laboratory (FAH IDL). Confirmatory testing was performed at the Australian Centre for Disease Preparedness (ACDP). The results were reviewed and accepted by the NSW Chief Veterinary Officer and the Fisheries Research and Development Corporation.

This project highlighted multiple areas of biosecurity risk mitigation inadequacy and non-compliance with BICON conditions of imported non-salmonid commodities. In particular it noted a disconnect between the assumed and actual risk mitigation achieved from current BICON conditions for importation of non-salmonid finfish commodities, and claimed that current biosecurity risk mitigation measures were not achieving an Appropriate Level of Protection (ALOP) for the Australian barramundi industry.

The biosecurity risk of uncooked seafood entering waterways via recreational fishers using seafood as bait or burley has been recognised for over two decades. Testing in the retail sector found large quantities of WSSV positive prawns dumped into Australian supermarkets (50- 80% of batches tested positive in Dec 2016) and subsequent surveys found 20-27% of recreational fishers in South East Queensland were using supermarket-bought prawns as bait.

With regard to the biosecurity risks associated with the importation of live ornamental fish, in 2021, DAWE advised importers of changes to the lists of approved countries to export live marine and freshwater ornamental finfish to Australia. Alarming, the advice confirmed that for those countries that continue to export live ornamental finfish to Australia and have not yet had a competent authority evaluation under the current departmental processes. Effectively, live ornamental fish were permitted to be imported in absence of an evaluation, and with no timeframe for such evaluation to be completed.

In summary, ABFA has low confidence that with current biosecurity controls, the Australian Government is meeting its legislative responsibility, primarily at the border, to manage biosecurity risks to protect Australia's animal, plant and human health status.

3. The proposed levy model offers a poor value proposition to members, lacking clear outcomes to reduce and better manage the risks to our sector from imported products.

We support the government's focus on biosecurity where that means positive outcomes for Australian agriculture, forestry and fisheries sectors. However, we cannot support the proposed model where there is no transparency on how this new levy will be administered and spent, and no clear outcomes to reduce and better manage the risks to our sector from imported products.

The proposed levy will be yet another burden on producers, on top of sky-high input costs. In the proposed model there is no assurance that this new levy to be imposed on producers will in fact deliver stronger safeguards to protect Australia.

In summary, the proposed levy model offers a poor value proposition to members and the wider community.

4. Given the complexities of the seafood industry, setting up fair and equitable levy rates, collection points and structures for the seafood sector by the government's deadline of 1 July 2024, will be extremely difficult.

With the exception of the farmed prawn sector, there are no existing levy structures within the seafood sector to which the Biosecurity Protection Levy could be appended, and there are limited common product aggregation points in the seafood supply chain.

Given the complexities of the seafood industry, setting up fair and equitable levy rates, collection points and structures for the seafood sector by the government's deadline of 1 July 2024, will be extremely difficult, if not impossible, and this is a significant concern for industry.

Any biosecurity protection levy arrangements must be practical, and implementation and administration costs as low as possible for all parties.

In summary, we urge that a mechanism and timetable for meaningful consultation with industry and its supply chain partners is needed, and the 1 July 2024 deadline is accordingly deferred.

Conclusion

Biosecurity is an issue the ABFA, and its members, take incredibly seriously. We have consistently invested in research and development over three decades to improve biosecurity management on farm and at an industry level, and to provide science-based recommendations to government.

Our members depend on an appropriately resourced biosecurity system, but at this time we cannot support a rushed biosecurity levy introduction that offers a poor value proposition to our members.

We urge that:

- A mechanism and timetable for meaningful consultation with ABFA and the broader seafood industry and its supply chain partners is needed, and
- the 1 July 2024 deadline is accordingly deferred.

Thank you

ABFA, on behalf of our members, would like to thank you for taking the time to review our submission. I welcome the opportunity to discuss any of our requests with you further and can provide more details if needed.

Yours sincerely,



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