

Department of Agriculture, Fisheries and Forestry
via email: SecretariatBSF@aff.gov.au

Submission – Proposed Biosecurity Protection Levy

As the peak representative body for the wild catch, aquaculture and trader/processor seafood sectors in the Northern Territory (NT), the Northern Territory Seafood Council (NTSC) welcomes the opportunity to provide input on Biosecurity Protection Levy.

NTSC membership covers over 215 businesses and the NT seafood industry in 2017/18 contributed \$136 million dollars (total GVA) to the NT economy with an additional \$22 million GVA generated indirectly to the rest of Australia. The NT seafood industry also contributes 941 FTE jobs throughout the Territory.¹

Firstly, it is important to note that the seafood industry in comparison to other primary production industries, is very complex. Within the Northern Territory industry are hundreds of different fish² species, that are found uniquely or more commonly in different parts of the Northern Territory waters and waterways. It is very difficult to measure the industry as a commodity as a whole, and importantly the industry has not been regulated with commodity levies previously.

For this reason, the NTSC is concerned about the proposed timeframe to design, understand the impacts of and implement a biosecurity protection levy for the seafood industry. As such it is suggested an extension for the seafood industry be provided past 1 July 2024 and further engagement is required.

NTSC align with the views expressed by Seafood Industry Australia (SIA) regarding the nuances of the seafood industry and the need for careful consideration of biosecurity funding. In addition, NTSC stands in support of the position presented by SIA and echoes their concerns and recommendations. Here is a summary of our alignment with SIA's position:

Delays Pending the *Futures of Seafood* study

NTSC endorses the notion that the application of the Biosecurity Protection Levy should be postponed until the Futures of Seafood study is completed which will deliver insights into cumulative policy impacts on the seafood industry. This aligns with the need for informed decision-making and understanding the impacts of the introduction of an additional cost via the Biosecurity Protection Levy on seafood businesses.

Nominal Flat Fee on Leases and Licenses

We concur with SIA's suggestion of exploring a nominal flat fee on commercial fisheries, aquaculture operations, and fishing tour operators (businesses aiding recreational fishing). We believe this approach offers an equitable way to distribute the burden of biosecurity funding within our industry. It is also supported that recreational fishers should contribute to the Biosecurity Protection Levy. However there is no recreational fish licensing system within the Northern Territory, and whilst a permit system has been introduced in recent years, it is only for some areas within the Northern Territory.

¹ Report titled *Northern Territory Fisheries and Aquaculture Industry 2017/18: Economic Contributions Summary* available online via: https://www.frdc.com.au/Archived-Reports/FRDC%20Projects/Economic%20Contributions_NT%20Summary_DEC2019Corrected.pdf

² "Fish" being a term to cover all aquatic life harvested or grown

The collection of a flat fee for commercial fisheries and aquaculture operations might be possible through the NT Fisheries Division, Department of Industry, Tourism and Trade (DITT). However this would require further engagement and exploration with the DITT.

Biosecurity Levy on Imports

NTSC supports the implementation of a biosecurity levy on air and sea freight, conveyance, or containers applied to imported seafood products. This aligns with the recommendations outlined in the 2017 Independent review of Australia's biosecurity system. Such a levy will contribute to safeguarding our domestic seafood industry from potential risks associated with imported products.

Industry Consultation and Transparency

We emphasise the importance of industry consultation in guiding the allocation of funds generated by the levy. Transparent reporting on the return on industry investment is essential to ensure accountability and the effectiveness of biosecurity measures.

Recognition of Industry's Role

NTSC underscores the value of early and genuine industry engagement in biosecurity management. Our industry possesses valuable insights, data, and practical experience that should be acknowledged by key decision makers. Collaboration and proactive identification of emerging threats are essential components of an effective biosecurity approach.

Tailored Approach for Seafood Industry

The seafood industry, as highlighted by SIA, differs significantly from terrestrial industries in terms of shared waterways, imports versus exports, and the diversity of species and supply chains. These unique characteristics necessitate a tailored biosecurity approach that accounts for the industry's complexities and values.

In closing, the NTSC fully supports SIA's position on the Biosecurity Protection Levy. We stand united with SIA in advocating for a biosecurity funding model that is fair, equitable, and informed by comprehensive insights into the seafood industry's dynamics and challenges. We appreciate the opportunity to provide our perspective and look forward to collaborative efforts to ensure the sustainability and protection of Australia's seafood industry.

Yours sincerely,



Katherine Winchester
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Northern Territory Seafood Council Inc.