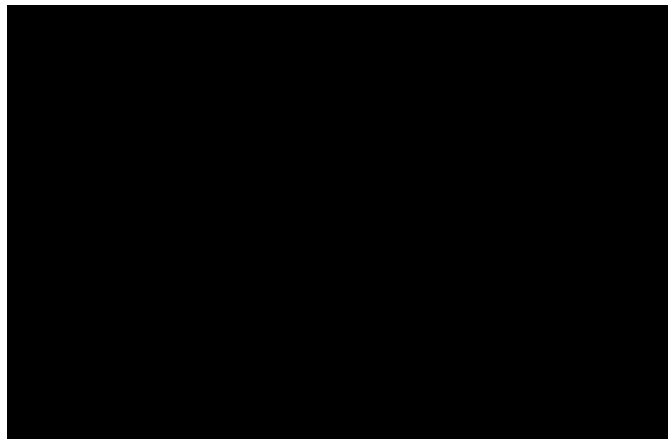




**Submission to
Department of Agriculture, Fisheries and Forestry
re the proposed
Biosecurity Protection Levy**



Introduction

1. [REDACTED] is the industry body representing [REDACTED] in New South Wales and Queensland.
2. Thank you for the opportunity to comment on the proposed bio security protection Levy, and we regret you are seeking to characterise it as a *fait accompli*.
3. We apologise that our submission has not met your deadline, but the most recent [REDACTED] which considered the issue occurred only shortly before the deadline for submissions.

Opposition to the proposed levy

4. Agricultural producers are not beneficiaries of the biosecurity system, as the Discussion Paper proposes, any more than is the importer of a wooden chair which has borers in it. Rather, like others in the community impacted by biosecurity incursions, agricultural producers are the victims of lax importers.
5. To characterise them as beneficiaries is ignorant and offensive.
6. [REDACTED] are price takers and cannot pass on additional costs, nor can they absorb additional costs. The proposed levy is a demand upon [REDACTED] to reduce their income, applied inequitably and without any kind of income test.
7. Many [REDACTED] are only now beginning to recover from the financial and emotional impact of [REDACTED] They cannot afford this additional impost.

This is not a levy

8. This proposal is not for a levy.
9. The Government has levy guidelines, and this new impost is introduced in a way not countenanced by those guidelines.
10. It is a fee, charge, excise, or tax and should be accurately labelled as such. While this may appear a semantic point, the existing levy system – which differs significantly from the proposed new charge – is well understood by industry to mean the collection of funds for industry purposes, overseen by industry representative bodies.
11. The proposed Biosecurity Protection Levy will, on the other hand, be a charge that will be funnelled into Consolidated Revenue, will not necessarily be hypothecated to biosecurity initiatives of direct relevance to industry, and there will be no industry oversight.
12. If the government insists on calling it a levy, they must comply with their own levy guidelines which require that levies are hypothecated, industry bodies manage the levies, their changes, and their disposition.
13. It is in no one's interests that the established meaning of "levy" be confused or modified without a proper discussion.
14. If the government chooses to not comply with their own guidelines, industry:
 - a. can have no confidence government will comply with other guidelines,
 - b. will not be obliged to comply with guidelines, and
 - c. cannot trust agreements entered into with government, or commitments made by government, such as these guidelines.

Details captured in the discussion paper

15. The budget papers include increased fees on outbound travellers, linked to biosecurity – they are not risk creators, nor risk beneficiaries – and that is at odds with the principles enunciated in the discussion paper about the levy. Those fees should be replaced by a higher levy on risk-creators
16. The proposal in the consultation paper that greater transparency and accountability will be achieved solely via an annual report publishing information on biosecurity funding, expenditure and outcomes, including revenue from the levy is not enough – a stronger governance system is needed.
17. It would be strongly preferred that the government adhere to their own guidelines on levies, and have all levies managed in the way which has historically demonstrated significant transparency and accountability, i.e. by industry.

Biosecurity failings must be addressed

18. Significant reforms to biosecurity governance, funding, disease categorisation, surveillance and detection, diagnostics and vaccine development, compliance and continuous improvement are required. That should be a precondition to consideration of any levy.
19. Inspector General of Biosecurity reviews have demonstrated in the past a lack of efficiency, transparency, and accountability in the biosecurity system. Reforming biosecurity governance would ensure program delivery is more targeted and effective and agencies are held accountable for not acting on Inspector General of Biosecurity recommendations.

Other matters

20. We wish to discuss this proposal further with Department of Agriculture, Fisheries and Forestry, and will raise more detail and issues, when next we meet with departmental officers.