



Biosecurity Protection Levy Submission

██████████ welcomes the opportunity to contribute to this submission process regarding the proposed biosecurity protection levy for Australia's agricultural industry. ██████████ recognises the Department of Agriculture, Fisheries and Forestry (the Department) for its integral work in maintaining Australia's strict biosecurity protocols and supporting this consultation process.

As the peak industry body, ██████████ strives to protect the interests of the industry and continually engages with Government and key stakeholders to address our industry's challenges. With over thirty-five years of experience in the ██████████ ██████████ is driven by a clear strategic approach to the future of ██████████ and has positioned itself as a leader in Australian agriculture.

The biosecurity protection levy risks adding to the burden of ██████████ operators by forcing them into an additional levy without clearer transparency over the use of the funds to deliver dedicated, additional, and tangible biosecurity outcomes for ██████████. Concerns remain around whether the levy's introduction would provide any specific benefits for the ██████████.

To alleviate these concerns, the introduction of the levy could provide an opportunity for the Government to improve transparency for ██████████ in terms of:

- data collection of ██████████ paying the levy; and
- ensuring that ██████████ paying the levy would receive the benefit of specific protections for ██████████

To assist the Department, this submission borrows from ██████████ submission on "Making National Biosecurity Funding Sustainable" provided to the Department on 28 November 2022. This submission includes a model for organic biosecurity funding which ██████████ believes is transferrable to a biosecurity model through the introduction of the proposed biosecurity protection levy.

Our Recommendations:

1. Data collection of the biosecurity protection levy should differentiate between certified ██████████.
2. Levies paid by certified ██████████ should be put towards organic industry-specific biosecurity measures.

Strengthening biosecurity support for Australia's organic industry

The ██████████ unique nature requires additional biosecurity control measures that align with ██████████ standards. Given the National Biosecurity Strategy is designed to engage all industries across the biosecurity system, these measures should encompass the rapidly growing \$2.6 billion ██████████ sector.

Integrating ██████████ requirements into the biosecurity framework's governance and administration would help safeguard the industry's commercial viability, further enhancing its diversified portfolio for both Australian and international markets. The recommendations emphasise greater focus on ██████████ within the biosecurity protection levy process.

How will this model work for the ██████████?

The model and recommendations involve training biosecurity officers to the category of certified ██████████ and educating them to consider peer-reviewed methods such as heat treatment,

modified atmospheres, plant-based treatments, thymol for varroa mite testing in [REDACTED] bee production, non-GMO vaccines for organic livestock, and functional testing when addressing the treatment and prevention of pests and diseases.

To ensure the protection of organic produce (e.g., preventing accidental chemical treatment), specific *coding* for certified [REDACTED] containers should be implemented within the overarching biosecurity framework, with importers to be guided accordingly as to the revised regulations.

Cost recovery for this model can be achieved through the implementation of the recommendations.

Impact of the proposed model

Australian consumers are increasingly buying [REDACTED] with a 35% increase in purchase intensity noted amongst [REDACTED] purchasing households according to the [REDACTED]. This growing demand requires a steady supply of various ingredients. While Australian producers are adapting to meet demand, certain products still need to be imported. Without biosecurity measures tailored to [REDACTED] businesses risk losing established markets and even their products if no alternatives are available. Furthermore, such obstacles also risk diverting [REDACTED] to the conventional market.

There has also been an increase in international [REDACTED] being imported into Australia, with the current percentage of international [REDACTED] being imported into Australia at approximately 12% (2023 Nielsen Consumer Data). As the technical aspects of Australia's biosecurity system continue to evolve and markets for products such as organic begin to grow in appeal for international businesses, incorporating efficiency mechanisms to meet the needs of *all* industries is crucial to ensure system-wide improvement.

Proportionality between contributions and benefits

[REDACTED] contribute levies to the main RDCs relevant to their sector. However, these levies are dispersed across projects relevant to most producers rather than focusing on [REDACTED]. Despite [REDACTED] representing less than 10% of the market, the industry's significant value of over \$2.6 billion accounts for considerable levy contribution and thus warrants tailored attention. This contribution should extend beyond the general requirements, ensuring dedicated [REDACTED] biosecurity options for producers, processors, and importers.

The initial step involves introducing transparent [REDACTED] data and implementing appropriate [REDACTED] biosecurity systems through the biosecurity levy. The failure to incorporate the specific needs of the [REDACTED] into the proposed levy risks perpetuating the issue, leaving [REDACTED] reliant on a broad protection levy lacking the necessary support for their unique biosecurity requirements.

The Commonwealth Government's role in strengthening biosecurity efficiency

There are genuine concerns about the system's ability to detect fraudulent [REDACTED] imports at the border stage. Allowing uncertified products claiming to be [REDACTED] into Australia without a clear understanding of their biosecurity risks could undermine the government's ability to maintain efficient biosecurity if fraudulent practices become widespread in the supply chain. The risk of non-certified operators importing goods falsely labelled as organic is significant and thus requires specific inclusion of [REDACTED] products under the biosecurity protection levy.

The Appropriate Level of Protection (ALOP) system is in place to mitigate biosecurity threats within Australia and ensure secure and low-risk trade, aligning with Australia's biosecurity goals.

Commonwealth Government's investment and actions for enhanced biosecurity

█████ advocates for targeted investment in data collection for █████ produce through the introduction of the biosecurity protection levy. Ideally, this would lead to levies paid by █████ operators being allocated towards addressing █████ biosecurity needs. This investment can also serve as a foundation for addressing biosecurity incursions like FMD, calculating plant disease vectors and improving other certification schemes.

Within Australia's complex biosecurity system, transparency is crucial. The government needs to clarify how levy funds will be allocated and utilised within the biosecurity system.

█████ recommends that the government views the introduction of the biosecurity protection levy as an opportunity to enhance traceability and improve the biosecurity framework for the agricultural industry. Without quantifiable benefits for █████ producers and the industry, the levy would only become another financial burden for █████, providing little to no enhancement to █████ biosecurity. Such an outcome would represent a missed opportunity for both the government and the █████ to strengthen biosecurity for █████ products in Australia, which is a scenario that █████ and the █████ sector cannot endorse.

For any further information on this submission, please contact our █████
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