CropLife Australia

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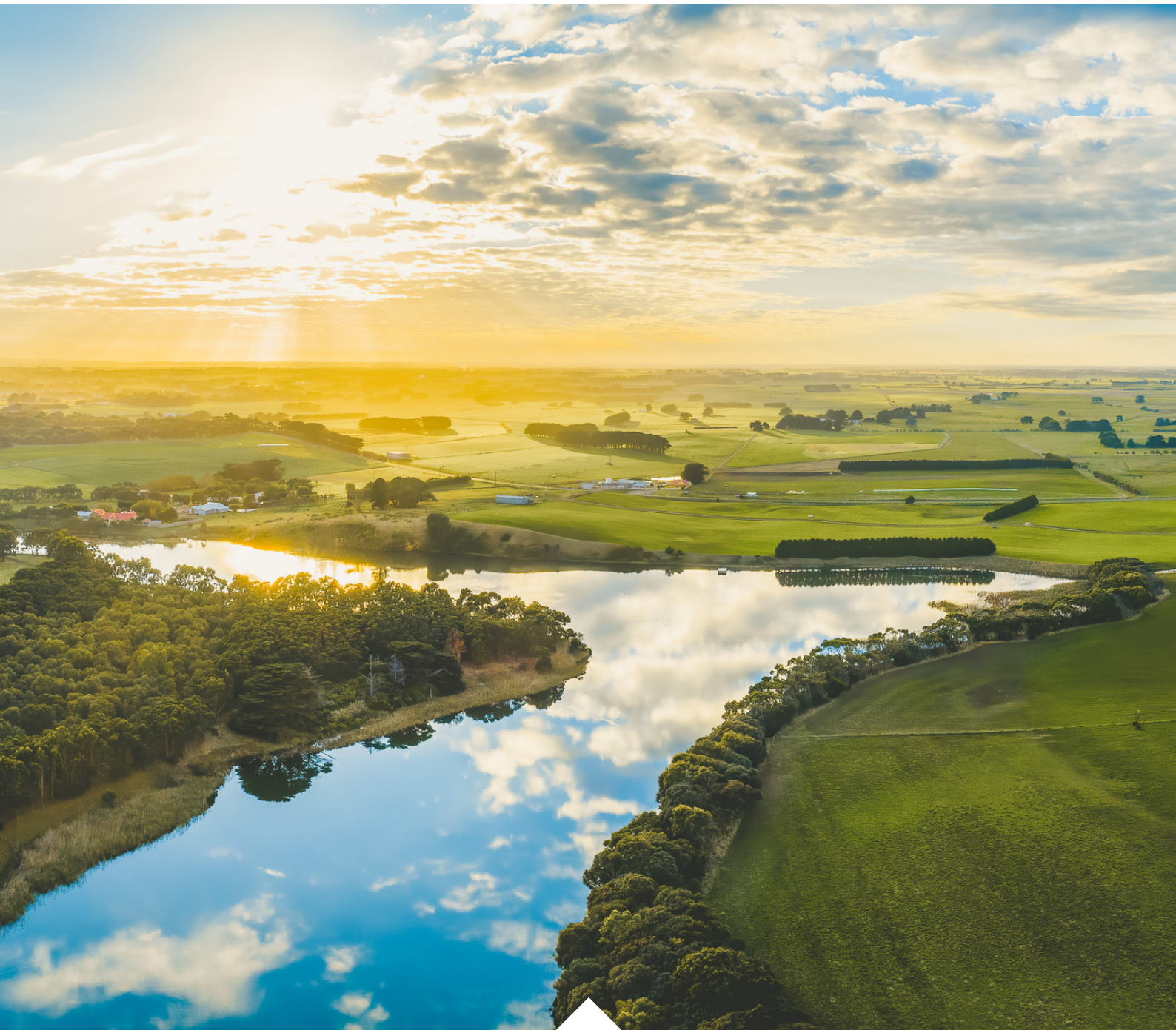
Sustainable funding and investment to strengthen biosecurity

Department of Agriculture, Fisheries and Forestry



1. INTRODUCTION

CropLife Australia is the national peak industry organisation representing the agricultural chemical and plant biotechnology (plant science) sector in Australia. CropLife represents the innovators, developers, manufacturers and formulators of crop protection (organic, synthetic and biologically based) and agricultural biotechnology products. CropLife's membership is made up of both large and small, patent holding and generic, and Australian and international companies and accordingly, CropLife advocates for policy positions that deliver whole of industry benefit. The plant science industry provides products to protect both crops and Australia's vast, biodiverse natural spaces against damaging insects, invasive weeds and diseases that pose a serious threat to the nation's agricultural productivity, sustainability, food security and our beautiful natural environment and delicate biodiversity. The plant science industry is worth more than $20 billion annually to the Australian economy and directly employs thousands of people across the country[1].

CropLife welcomes the opportunity to provide comments to the discussion paper for sustainable funding and investment to strengthen biosecurity. It is essential to ensure a viable, fair and sustainable funding model to deliver outcomes which protect the environment and the community from biosecurity incursions and risks.

[1] https://www.croplife.org.au/wp-content/uploads/2018/04/Deloitte-Access-Economics-Economic-Activity-Attributable-to-Crop-Protection-Products_web.pdf

2. THE NEED FOR SUSTAINABLE FUNDING

One of the priority areas identified in the 2022 National Biosecurity Strategy is sustainable investment. Invasive, exotic weeds, insects and diseases would not only be catastrophic to Australia's food production, but also cause significant damage to Australia's unique and fragile environment if they become established. Vigilant monitoring for the arrival and introduction of these species is required to inform stakeholders of the threats they pose. As the 2017 Craik review illustrated, incursions of exotic organisms harmful to Australia's environment and social amenity are a regular occurrence and have been most recently illustrated by the emergency responses to Foot and Mouth Disease off the northern border, and the *Varroa destructor* incursion into New South Wales. However, national environmental pest and disease risks are yet to be systematically identified, prioritised and planned for[2].

What elements do you think a sustainable biosecurity funding model should include? How should the proposed model operate at a practical level and who would it apply to?

Between 2012 and 2017, the annual number of interceptions of biosecurity risk materials at Australian borders rose by almost 50%, to 37,014[3]. As an example, over three million sea containers arrive in Australia each year, yet only about eight per cent of these actually undergo biosecurity inspections. The rest are determined to pose no biosecurity risk based on declarations or departmental risk assessments. Random sampling of these shipments are undertaken to ensure accuracy in declarations, which can detect trends in inaccurate or unscrupulous documentation. However, in 2017 and 2018, two-thirds of targeted inspections were not carried out due to resource constraints, while 13 per cent of the inspections showed some level of non–compliance[4]. Further, the NSW DPI notes that insect and disease introductions into Australia have quadrupled in the last five years, forming an increasing upward trend[5].

It is important that any cost recovery measures are applied in a way as to reflect both the assessed risk of the cargo, as well as the appropriate costs of screening, management, or destruction of potential biosecurity incursions. Repeated, time-consuming review and consultation would maintain ongoing uncertainty into long term biosecurity funding. Biosecurity incursions are not limited to container arrival; other risks exist including bulk vessels, mail, and returning travelers. Every bit as concerning are environmental incursions via wind and water which neither make declarations nor arrive at designated border checkpoints.

2 https://www.agriculture.gov.au/sites/default/files/sitecollectiondocuments/biosecurity/partnerships/nbc/priorities-for-aus-bio-system.pdf
3 https://www.igb.gov.au/sites/default/files/documents/qid52820_igb_interceptions_and_incursions_report_-_final_1.pdf
4 https://www.igb.gov.au/media-releases/inspector-general-biosecurity-review-pest-and-disease-interceptions-and-incursions
5 https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0020/1414505/Consultation-Draft-Biosecurity-and-Food-Safety-Strategy-2022-2030.pdf

Neither the container levy proposed by the 2017 Craik Review nor the Full Import Declaration (FID) highlighted by the 2019 Biosecurity Levy Steering Committee can capture these. Therefore cost recovery should continue to be shared as per the current mixed model of biosecurity funding between all parties and the commonwealth, state and territory governments. Any expanded or reformed industry cost recovery arrangements (at border and pre-border) should be accompanied by increased level of government funding through budget appropriation.

Is the proportionality between those who contribute to the funding system and those who benefit the most, right?

In 2006, the then NSW Department of Environment and Conservation listed weeds and pests as second only to habitat loss as a cause of biodiversity decline[6] and cautioned that weeds presented the greatest threat to our National Parks[7]. A more recent study by researchers at the CSIRO and Flinders University demonstrated that invasive plants are the costliest pests in Australia, costing $200 billion since 1960.[8] In 2021, the Invasive Species Council's report 'Glyphosate: A Chemical to Understand' highlighted that herbicides offer the only truly effective option for removing invasive weeds from Australia's bushland reserves and that, without them, most of the remaining indigenous vegetation in Australia would decline in both quantity and quality[9].

The direct benefits of sustainable funding for effective biosecurity are therefore not limited to primary producers or the broader agricultural sector, and so must not be identified as sole beneficiaries of the biosecurity system. The costs of mitigation of established invasive insects, weeds, and diseases (and therefore the benefits) are borne not only by farmers, but by state and territory governments, parks and maintenance departments, local councils, and individual citizens.

Specific risks can be identified and mitigated from targeted and identified regions. An increased passenger movement charge, with a fixed share going directly to the Commonwealth's biosecurity system, is entirely appropriate.

[6] https://researchprofiles.canberra.edu.au/en/publications/the-impact-of-weeds-on-threatened-biodiversity-in-new-south-wales
[7] https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Parks-reserves-and-protected-areas/state-of-the-parks-2004-050051.pdf
[8] Corey J A Bradshaw and others, 'Detailed Assessment of the Reported Economic Costs of Invasive Species in Australia', *NeoBiota*, 67 (29AD), 511–50 <https://doi.org/10.3897/neobiota.67.58834>
[9] https://invasives.org.au/wp-content/uploads/2020/11/Glyphosate-A-Chemical-to-Understand.pdf

Are there other technologies, current or emerging, that could be employed to increase the efficiency of the biosecurity system, and perhaps reduce operational cost? How could the Commonwealth Government improve efficiency in the biosecurity system (consistent with meeting our Appropriate Level of Protection)?

CropLife, as the peak industry body for the plant science sector, is not in a position to comment on alternative or novel mechanical technologies. However, given that the tools of the plant science industry – pesticides, including fungicides, insecticides, and herbicides – are the tools deployed to both eradicate pest incursions and mitigate established pests, regulation must not impede access to these tools.

The regulation of the registration and use of crop protection products in Australia must be efficient and effective so that environmental land managers, famers and municipalities across Australia have access to the innovative tools the plant science industry provides. Each of these products is rigorously assessed by the Australian Pesticides and Veterinary Medicines Authority (APVMA) to ensure they are safe to use and present no unacceptable risk to applicators, consumers, the community as a whole, the environment or Australia's domestic and international trade of agricultural produce.

It is important to note and utilise the APVMA's capacity to provide emergency permits and registrations to prepare for the predicted incursions of biosecurity threats. Many examples exist and are held by various national, state and territory departments, but also Research and Development Corporations and industry bodies to avoid regulatory delay in the deployment of chemical interventions to mitigate and manage new threats.

The plant science industry's crop protection products include fungicides, herbicides and insecticides that are also critical in maintaining and improving Australia's agricultural productivity to meet future global food security challenges. As above, invasive, exotic weeds insects and diseases not currently established in Australia would cause significant damage to Australia's unique and fragile environment in addition to the nation's farming sector if they become established.

In 1995, it took the assessment of 52,500 compounds to develop one effective new pesticide chemical active constituent. It now requires the assessment of more than 160,000 compounds and expenditure of more than $400 million ($286m USD) over an eleven-year period to bring just one successful pesticide to the market[10]. More than one-third of this cost directly relates to compliance with regulation and registration requirements. Without access to these tools, farmers could lose as much as 50 per cent of their annual production to pests, weeds and diseases, and environmental land managers would have no ability to prevent, eradicate and manage threats to the natural environment. Ongoing research and development to identify new pesticides and ensuring that these new innovations will be accessible to Australia are

[10] https://www.agriculture.gov.au/sites/default/files/documents/agvet-chemicals-market-drivers-barriers.pdf

imperative for maintaining Australia's biosecurity future. CropLife maintains that the regulation of the use of pesticides must be efficient and effective so that stakeholders have access to the innovative tools the plant science industry provides to mitigate invasive alien species – be they plant, insect or pathogen. Above all, this requires an efficient, adaptive and science-based regulatory environment to encourage both continued innovation in next-generation tools, but also support for existing, proven, effective and safe solutions to be integrated with novel technologies that is then economical for Australian taxpayers, developing an increasingly efficacious and sustainable system.

How could the Commonwealth Government improve efficiency in the biosecurity system (consistent with meeting our Appropriate Level of Protection)?

Further to the identification of appropriate risk identification, there remains inefficiency and uncertainty in the Biosecurity Import Conditions (BICON) system. Substantial backlogs at BICON Permit processing have been variously problematic over the preceding years. The Plant and Animal Imports biosecurity divisions have variously issued notices and posted disclaimers on the BICON website, regarding delays in import permit processing and approvals. This involved significant delays and unpredictability associated with obtaining the requisite import permits for both critical components of, and formulated crop protection products.

As above, these are the very products tasked with the eradication and management of invasive biosecurity incursion.

Despite the publication of new import cases to introduce standard permits for conditionally non-prohibited goods and products[11],[12], these backlogs continue to threaten the timely arrival of goods deemed low or no risk by Director of Biosecurity. Further, there are non-standard permits required for many pesticides of biological origin which importers have been advised assessment can take a minimum of 12 weeks to accomplish. While this may be variously appropriate for new or novel compounds, products which have undergone assessment by the APVMA and bear an APVMA approval number should require no further permitting.

Genuine commitment, to and investment, in an updated Goods Determination for these lists of conditionally non-prohibited products will reallocate resources from unnecessary administration of products of low risk and allow for greater scrutiny of known and identified appropriate risk material.

[11] Approved ingredients – Environmental End Use Biological Cleaning Agents, Odour Neutralisers or Sanitisation Products (agriculture.gov.au)
[12] https://www.agriculture.gov.au/biosecurity-trade/import/online-services/bicon/bicon-permit/standard-permit

What other investments or actions could the Commonwealth Government make or take to sustainably support the delivery of biosecurity activities?

The delivery of the National Biosecurity Strategy and sustainable funding for the National Biosecurity system must be met with similar commitment from and harmonisation with state and territory government strategies and initiatives. States and territories tasked with the interception and eradication or mitigation of biosecurity incursions must be appropriately resourced to uphold their responsibilities. As above, incursions continue to increase both in frequency and severity. The responses to date have met with mixed success, as is evident given the ongoing costs associated with managing established invasive pests. The broader discussion around sustainable funding for biosecurity should involve commitments for harmonisation of tactics and measures between the Commonwealth and states and territories.

3. CONCLUSION

CropLife is pleased that the Commonwealth is committed to sustainable funding and investment to strengthen biosecurity. CropLife will continue to work collaboratively with all stakeholders to implement a stable, efficient and effective system that will safeguard Australia's biosecurity future. It is important to note that pesticides, whether they be organic, synthetic or biologically based, play a crucial role in Australia's biosecurity measures and response preparedness and will only become even more significant and important in coming years as further threats evolve. All relevant government agencies, industries and stakeholders will need to work collaboratively and efficiently driven by scientifically based policy and initiatives supported by efficient regulatory systems to safeguard Australia's biosecurity future. The plant science sector will continue to foster and enable environmental conservation and the protection of Australia's rich natural biodiversity though product innovation and development. The products and innovations of the plant science continue to foster and enable Australia's goal of producing $100 billion in farm gate output by 2030, as well as supporting environmental conservation and the protection of Australia's rich natural biodiversity.