



CATTLE COUNCIL OF AUSTRALIA

28th November 2022

Ms Peta Lane
First Assistant Secretary
Biosecurity Strategy and Reform Division
Department of Agriculture, Fisheries and Forestry
18 Markus Clarke St
Canberra ACT 2601
Via email: SecretariatBSF@agriculture.gov.au

SUBMISSION

Re: Response to discussion paper – *Sustainable funding and investment to strengthen biosecurity*

Dear Ms Lane,

In response to the Department's discussion paper *Sustainable funding and investment to strengthen biosecurity*, Cattle Council of Australia (CCA) welcomes the opportunity to provide feedback on behalf of the grass-fed cattle industry. We provide our response without prejudice to any additional submission from our members or individual producers.

CCA understands the urgency for preparedness in response to biosecurity threats and has supported the development and recent implementation of the Draft National Lumpy Skin Disease Action Plan, the National Biosecurity Strategy, and the Commonwealth Biosecurity 2030 Roadmap.

CCA supports the assertion that the biosecurity risks facing Australia are becoming increasingly complex and harder to manage. Several significant exotic animal diseases have emerged in our region, escalating the biosecurity threat to our cattle industry. It is imperative that Australia increase its focus, resourcing, and promotion of biosecurity as a national priority.

Regarding the need for improved biosecurity systems, CCA has been consistent in its approach to the task at hand and can attest to the increased resourcing (and funding) that is required to meet an ever-increasing threat. CCA supports:

1. The assertion that the biosecurity risks facing Australia are becoming increasingly complex and harder to manage and that we are facing an ever-increasing level of threat.
2. Improved resourcing of our national biosecurity systems, so that our biosecurity systems are equal to the ever-increasing level of threat at any given time.
3. The delivery of sustainable and long-term funding and investment needed to meet the increased resourcing required.

The National Biosecurity Strategy

In response to the consultation regarding the National Biosecurity Strategy, CCA supports the strategy and the rapid application of this strategy. Our recent submission to the Draft Strategy insisted that:

1. There be an immediate strengthening and resourcing of biosecurity
2. Any additional revenue be spent solely on upgraded biosecurity systems and protocols
3. There be a substantial increase in biosecurity detector dogs, sufficient for risk-based screening of the rising volumes of incoming passengers, mail, and freight
4. The annual demand for an 'efficiency dividend', as it impacts on border-biosecurity staff numbers, be removed.

The Senate Inquiry into “The adequacy of Australia’s biosecurity measures ...”

In response to the recent Senate Committee Inquiry into “The adequacy of Australia’s biosecurity measures and response preparedness, in particular with respect to foot-and-mouth disease ...”, CCA called for:

1. Increased domestic border measures in-line with increased threat levels
2. A focus on early detection, particularly for exotic disease transmitted by airborne vectors (LSD)
3. Continued support for Indonesia to contain and eradicate FMD and LSD
4. The development of livestock vaccines and rapid diagnostics
5. The development and implementation of a sustainable long-term funding model for biosecurity

National Lumpy Skin Disease (LSD) Action Plan

CCA supported the development and implementation of an LSD Action Plan and the need for international engagement to support such a plan. In supporting the National LSD Action Plan, CCA called for:

1. A nationally consistent livestock traceability system
2. Specific LSD (and FMD) surveillance activities
3. Pre-incursion activities such as feral animal control, wild cattle and buffalo control, establishment of buffer zones where appropriate and negotiated zoning arrangements with trading partners
4. Arrangements and contingency plans for rejected Australian live export consignments and scenario planning and exercises around the rejection of live export consignments
5. Infrastructure investment for strategically located truck washdown bays and the improvement of northern Australia cattle slaughter capacity to assist with potential slaughter out activities
6. Vaccine including the establishment of an off-shore vaccine bank for LSD and the rapid establishment of domestic vaccine technology
7. Training, including improved resources for rapid training of stakeholders and industry representatives in regard to LSD (and FMD)
8. Specific landholder engagement activities including traditional landowners specifically concerning feral animal control, biosecurity and land management
9. Coordination between the Commonwealth, States/Territories, and industry.

Sustainable funding and investment to strengthen biosecurity

Biosecurity is a shared responsibility and, for our biosecurity measures to be most effective, all parties must contribute. CCA asserts that all Australians benefit from good biosecurity, including our farmers and our natural environment. CCA supports the assertion that long-term sustainable biosecurity funding models require co-investment and co-design across the biosecurity continuum.

Government at all levels together with all beneficiaries and risk creators must contribute to maximise the funding and resourcing available for what is fast emerging as a national priority. To this end, all parties must maintain flexibility toward their contribution to meet the ever-increasing biosecurity challenge.

CCA supports the following principles regarding the long-term sustainable funding of Australia's biosecurity:

1. Biosecurity is a shared responsibility, to which everyone must contribute.
2. Biosecurity funding and resourcing must increase in-line with increased threat levels in our region, with funding and resourcing directed to the areas of greatest threat.
3. All biosecurity beneficiaries (the public, agricultural industries and the environment) should invest in their own biosecurity activities, as well as collectively, and maintain a flexible approach to their contributions into the future.
4. Risk creators, such as container freight importers, need to pay for the inspection and enforcement associated with their risk creating activities.
5. All increases in funding for biosecurity, irrespective of the source, must be invested directly into improved biosecurity measures.

In terms of the application of the above principles, CCA calls for:

1. The Australian government to continue to do all things reasonable to prevent the entry of exotic pests and diseases into Australia via an adequately resourced and sustainable funding model. All Australians benefit from good biosecurity and CCA recommends increased public investment in biosecurity, on behalf of Australian agriculture and the grass-fed cattle industry, particularly in areas that are difficult to cost recover, such as:
 - a. Pre-Incursion biosecurity activities such as feral animal control, wild cattle and buffalo management, establishment of buffer zones where appropriate and negotiated zoning arrangements with trading partners.
 - b. Unregulated risk pathways, such as airborne incursions
 - c. Northern Australian incursion pathways
 - d. Biosecurity research
2. Increased investment in biosecurity in line with current and perceived future levels of biosecurity risk. The Australian Government, must consider committing to a full analysis of current national biosecurity investment and trends, including total investment by beneficiaries, risk creators and government (at all levels), as a benchmark by which to consider future investment.

3. All beneficiaries of good biosecurity must continue to invest in their own biosecurity practices and maintain high standards. Agricultural industries, as beneficiaries of good biosecurity, continue to invest in their own biosecurity activities. For our part, CCA recognises the grass-fed cattle industry's investment via:
 - a. The Animal Health Australia levy, set at just \$0.13 per transaction, contributes to the \$7.5 million annual levy investment in Animal Health Australia, to develop programs that improve cattle health and biosecurity.
 - b. Producer transaction levies, totalling more than \$7.0 million that fund the annual operations of the Integrity Systems Company, which provides lifetime traceability for the grass-fed cattle sector as well as other sectors.
 - c. Direct producer investment in NLIS lifetime traceability, particularly cattle ear tag investment. Australia's current 24.4 million head of cattle (MLA 2021) represent a total investment of almost \$100 million in lifetime traceability devices, on the part of producers.
 - d. Producer investment in everyday on farm biosecurity as part of their grass-fed cattle enterprise including Livestock Production Assurance (LPA) compliance, on farm biosecurity plans, personnel movement control, data management, livestock reconciliation and other cattle transfer compliance activities. Further, downstream supply chain costs including export meat inspection costs and traceability infrastructure can be also partially attributed to producers.
4. Risk creators, such as container freight importers, need to pay for the inspection and enforcement associated with their risk creating activities. As imported freight volumes increase, so too must the investment in funding related to biosecurity inspection and enforcement activities. CCA continues to support the unanimous recommendation of the Biosecurity Levy Steering Committee to:
 - a. Place a levy on incoming shipping containers to support biosecurity inspection and enforcement
 - b. The levy should be applied via the existing Full Import Declaration
 - c. Implement a robust, science-based assessment of biosecurity risk across the various vectors and pathways that is sufficiently detailed to enable values to be attached to the levy
 - d. The finalised design of the levy should be subject to a Regulation Impact Statement
5. All increases in funding and resourcing must be spent directly improving biosecurity measures. CCA recommends ongoing consultation in this area to ensure increases in funding are matched by increases in resourcing.

We look forward to further consultation with the Department on this important process. If there are any queries about this submission, please do not hesitate to contact our office on 1300 653 038 or email policydirector@cattlecouncil.com.au.

Yours sincerely



John McGoverne
Chief Executive Officer