



AUSTRALIAN
**Prawn
Farmers**
ASSOCIATION

Submission to the
Department of Agriculture, Fisheries and Forestry
on the
Sustainable funding and investment to strengthen biosecurity:
discussion paper.

November 2022

Submitted and directed to:

Have Your Say

<https://haveyoursay.agriculture.gov.au/sustainable-biosecurity-funding>

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The Australian Prawn Farmers Association

The Australian Prawn Farmers Association (APFA) is the peak representative organisation for the Australian farmed prawn industry.

Established in 1993, APFA represents the common interest of members and promotes and supports all aspects of the industry.

APFA provides the link for communications between growers and related sectors including infrastructure suppliers, the finance sector, retailers and exporters, technologists, researchers and all levels of government.

The nature and current status of Australia's prawn farm sector

The Food and Agriculture Organization of the United Nations' (FAO) latest worldwide statistics on aquaculture shows world aquaculture production of 82.1 million tonnes of aquatic animals with a value of approximately US \$250 billion (FAO, 2018). The forecast is that aquaculture will supply the majority of aquatic protein in people's diets by 2050 (FAO, 2018).

As demand for seafood continues to rise and wild-caught fisheries reach ecological sustainable levels, any substantial growth in seafood production will need to be driven by aquaculture (DAFF 2021).

In 2019-20 Australia's aquaculture sector represented 48 per cent of Australia's total seafood production with a value of \$1.64 billion dollars.

The Australian prawn farm industry is undergoing rapid and significant growth in production with the industry currently **valued at \$160 million in 2020-21** (Lobegeiger, DPI NSW, 2022). This is up from **\$130 million** in 2019-20 and \$80 million in 2018-19.

Strong ongoing significant growth is planned in Queensland with the industry becoming an important regional economic driver including in the areas of regional investment, labour, new skills and training, increased transport investment and increased feed manufacture investment, all contributing to improved social and economic outcomes for regional communities.

APFA response to the Sustainable Funding and Investment to strengthen biosecurity: discussion paper (the Review)

The APFA agrees that to become a strong biosecurity system to meet the global challenges, Australia needs sustainable and adequate resourcing to meet operating needs, deliver essential business transformation and drive co-investment with states, territories, industry and other key system participants.

The APFA welcomes the Review and the opportunity to provide feedback on the discussion paper on *Sustainable funding and investment to strengthen biosecurity* and provides the following response below.

1. Considering the potential funding options and opportunities above, as well as from your experience, what elements do you think a sustainable biosecurity funding model should include? Are there elements that should not be included; if so, why?

Almost 70% of seafood consumed in Australia is imported (DAFF), much of it uncooked.

The government's Expert Panel's review of the Prawn Import Risk Assessment Provisional Report advised the most likely route of the white spot syndrome virus (WSSV) incursion in 2016 was through the use of imported raw prawns for bait and berley (DAFF).

For this reason, importation is considered by industry to be a significant risk pathway (and thereby creator) to biosecurity. Please refer to our submission to the *Review of the biosecurity risks of prawns imported from all countries for human consumption* for further in-depth information.

A biosecurity funding model should consider greater funding from increased risk sources similar to standard insurance fee structures.

In summary, APFA is not supportive of stopping trade. APFA acknowledges the international WTO rules surrounding trade and also recognises there is a market for imported prawns due to the price point.

However, the application of appropriate sanitary measures applied to high risk imported goods particularly that which is being unlawfully used as bait and berley (going directly in the water in high quantities) is required. Exotic diseases entering Australia can easily become endemic in aquatic and ocean environments.

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2. How would your proposed model operate at a practical level and who would it apply to?

Australian aquaculture, and specifically prawn farming, works with the land - not on it. This is important to note as industry is dependent on maintaining clean and healthy waterways and ecosystems in order to raise healthy animals and meet the highly quality food standard expected with Australian prawns.

Prawn farmers have invested heavily in biosecurity plans and measures to try and meet the challenges raised due to pathogens and exotic diseases entering the country. Australian prawn farms, with the biosecurity measures already in place, present little risk when taken in context with the threats occurring pre and at border. However, there is only so much on-farm biosecurity that can be implemented in an attempt to protect farms and surrounding waterways. Prawn farms have already significantly contributed to biosecurity investment and continue to do so.

To reduce the risk associated with these recognised pathways into Australia, investment must be made before and at the border.

The implementation of a biosecurity levy was recommended by the 2017 Independent review of the capacity of Australia's biosecurity system. The 2017 review outlined the significant funds it would generate and should be expanded to include bulk imports arriving via air.

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3. How would your proposed model impact you and others? What would be the benefits or disadvantages to you and/or other stakeholders?

Although importers would be impacted financially, it is important to implement the recommendations from a number of previous Inspector-General of Biosecurity reviews, most notably the review of the department's current operational model (I-GB No 2020-21/01) which highlighted inadequate responsiveness to import business needs and inadequate agility between import risk pathways or unnecessary direct costs imposed from inappropriate charge levels or structures. This review demonstrated that significant improvement was needed to streamline delivery of regulatory functions to reduce cost pressures on importers.

By investing in a biosecurity levy, the department can streamline biosecurity measures, upskill employees on the front line and invest in more technologically advanced systems which will in turn assist importers by removing disruption and delays to their business.

Strong investment in compliance and enforcement must also be undertaken.

The advantage to aquaculture, recreational fishing, commercial fishers, First Nations' values and food security, and Australian prawn farming, would be the reduction of the risk pathway for exotic diseases and pathogens.

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

As reported in the Inspector-General of Biosecurity's 2017 Report *Uncooked prawn imports: effectiveness of biosecurity controls (IGB 2017 Report)* highlighted the cost to the Australian Government, Queensland Government, Logan River prawn farms, commercial fishers, recreational fishers and businesses affected by the movement control order in Moreton Bay to be in the vicinity of \$162,870,000.

When a disease incursion occurs, it cannot be argued that the victim benefits.

The most effective way to manage the risk to Australia's Appropriate Level of Protection is through preventative action pre and at the border.

The economic returns from preventing the entry of a pathogen (or pest) far outweighs that of containment after border failures for whatever reason. Therefore, where it is possible to institute simple straightforward effective measures at the border, it is the responsibility of our regulators to do so.

Importers must also benefit through streamlined and effective regulation targeted at reducing unnecessary regulatory burden while upholding strong biosecurity measures including compliance and enforcement.

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5. Are there other technologies, current or emerging, that could be employed to increase the efficiency of the biosecurity system, and perhaps reduce operational cost?

At the farm/hatchery level, point of care test kits as well as eDNA technology would allow farmers to rapidly detect potential exotic disease incursions and take preventative measures faster to minimise spread and large biosecurity events.

Blockchain could also be useful for tracking shipment (individual boxes within containers) of imported product to enable real time tracking of where imported product started from (originating country) and is located at any point of time in the supply chain. In the event of a disease incursion this would enhance traceability (data would include any pre and at border compliance checks).

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

Given the historical failures of the past (as highlighted in the IGB 2017 Report and Operation Cattai) it is vital that Australia's biosecurity standards and processes for imported prawn products are brought up to the same high standards enjoyed by other industries (salmonids, terrestrial livestock). This will ensure maintenance of a consistent ALoP in the face of future challenges.

In relation to WSSV, to protect their valuable fisheries and aquaculture industries soon after the WSSV incursion in 2016/17, a number of states (Qld, NSW, WA and SA), introduced control movements of prawns across their borders (and a movement control order within Qld) advising they must be cooked. This demonstrates cooking as the only acceptable biosecurity measure for prawns destined for human consumption to achieve Australia's domestic ALoP and reduce the risk of interstate translocation of WSSV to very low.

The application by Qld of the control movement order should by definition determine what an acceptable ALOP looks like for Australia, including the resultant control measures, ie cooking. Any less creates an unfair trading environment where essentially the risk creators get an unfair advantage in the market.

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

Implement the recommendations from the various Inspectors-General Biosecurity reviews.

It is vital to establish pathway partnership engagement including with industry as early as possible when developing policies and protocols and establish genuine data sharing arrangements.

The Department and the Prawn IRA Review team are to be acknowledged for the in-depth work that has gone in to researching and writing the 354-page Review of the biosecurity risks of prawns imported from all countries for human consumption – Draft Report. However, the review process has taken many years which has exposed Australia's prawn fisheries and aquaculture industries to heightened disease incursion risks that continue to increase over time.

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It is vital that Australia's biosecurity standards and processes are "future proofed" against the global biosecurity challenges that we face today, and which continue to emerge at an alarming rate. The porosity at the border remains a significant challenge. Infected WSSV positive consignments of prawns are still entering retail sale in Australia, which is a clear example of the unacceptably high risks posed by just one of many diseases of concern.

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Conclusion

APFA would like it noted that the 200 word limit per question to the 7 structured questions as well as the short timeframe to respond prior to Christmas, limits a comprehensive response to a very complex matter and welcomes any further follow up to the responses above.

The APFA is committed to working with all stakeholders to enhance Australia's food security and ensure long term environmental and social sustainability supported by strong and effective biosecurity, and supports facilitating any further discussions involving its members and stakeholders.

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