



Greenlife Industry Australia Ltd
Submission

**Sustainable funding and investment to strengthen
biosecurity: discussion paper**

Introduction

Greenlife Industry Australia (GIA) is the peak national industry body representing producers, retailers and allied trades involved in the production of plants across all states and territories of Australia. In partnership with state and territory peak bodies, GIA is responsible for overseeing the national development of the Australian nursery industry. The nursery industry is a significant sector of the Australian horticultural industry and employs over 30,000 people in more than 20,000 small to medium sized businesses with a combined supply chain market value in excess of \$15 billion dollars annually. The farm gate value of nursery production is \$2.8 billion annually in sales to end users, from a total plant production of \$3.6 billion, growing more than 2.3 billion plants.

Nursery production in Australia has a diverse and broad supply chain with multiple end users requiring a huge crop base (approx. 30,000 + plant species/cultivars in production) grown across a range of cropping systems including glasshouse, greenhouse, open bed and in-ground. The industry is a provider of greenlife (nursery stock) for many other horticultural industries including forestry, revegetation, fruit and vegetable cropping, pharmaceutical as well as urban retail and landscaping.

Depicted in Table 1 is the wide range of end users supported by the Australian nursery production industry.

Table 1: National value of horticultural sectors supplied by production nurseries

Production Nursery	Horticultural markets	Economic value
Container stock ¹	Ornamental/urban horticulture	\$2 billion retail value
Foliage plants ¹	Indoor display/hire	\$87 million industry
Seedling stock ²	Vegetable growers	\$3.3 billion industry
Native and exotic forestry stock ³	Plantation timber	\$1.7 billion industry
Fruit and nut tree stock ²	Orchardists (citrus, mango, etc)	\$5.2 billion industry
Landscape stock ¹	Domestic & commercial projects	\$2 billion industry
Plug and tube stock ²	Cut flower growers	\$700 million industry
Revegetation stock ¹	Farmers, Government, Landcare	\$109 million industry
Mine site revegetation	Mine site rehabilitation	Value unknown
Total Horticultural Market Value		\$15.0 billion

¹ Freshlogic (2008) Australian Garden Market Monitor for the Year Ending 30 June 2008

² Horticulture Australia Limited (2004) Australian Horticultural Statistics Handbook

³ Australian Bureau of Agricultural and Resource Economics (2008). Australian Forest and Wood Products Statistics

Industry Statement

Production nurseries are the cornerstone in the supply of starter plants for the majority of horticultural crops, both urban (foliage) and commercial (food/fibre/pharma), having the expertise in propagating and growing starter plants for a range of horticultural enterprises targeting various domestic and international markets. This expertise includes seed germination, raising and growing, grafting or budding on pest/disease resistant and/or vigorous rootstocks, rapid multiplication of true to type, high yielding, high health and disease resistant plant varieties through tissue culture.

The industry is also the primary sector for the identification, introduction and propagation of new and improved plant varieties across most production categories in the food, fibre and foliage sectors. These skill sets and the expertise of industry exist nowhere else in horticulture thereby making nursery production a critical component in the supply chain of our urban greenlife and food/fibre/pharma horticultural products. The nursery industry is a key component for increasing farm productivity through the introduction of higher yielding varieties, increasing disease resistance and improving drought tolerance due to the development of hardy and new varieties plus the grafting of high yielding species to appropriate root stocks.

GIA supports the concept of “biosecurity being everybody’s responsibility or a shared responsibility” and would like to see a regulatory and investment framework that underpins this concept as opposed to a perception that government is endeavouring to cost shift, particularly in **plant biosecurity**. GIA also expects a concerted effort be made towards reducing unnecessary regulatory burden on industry as well as looking at alternative, flexible, advanced and practical solutions to a range of issues confronting the effective operation of **plant biosecurity** in Australia.

Nursery production has had a growing investment in biosecurity resource development over recent years through statutory R&D levy investment, under the current horticulture RDC, along with being a member of Plant Health Australia and a signatory to the Emergency Plant Pest Response Deed (EPPRD). Production nurseries across Australia are also being charged for every biosecurity service provided by all levels of government adding to the industry investment along the biosecurity continuum.

The industry has committed to a number of biosecurity programs over a 10 year period (2016 – 2025) totaling more than \$11 million and has been engaging with other sectors of horticulture in cooperative projects and is a committed signatory to the Emergency Plant Pest Response Deed, being one of the initial 10 signatory partners. GIA is a strong supporter of nationally coordinated biosecurity engagement as demonstrated by its commitment to various support committees including the past Plant Biosecurity CRC Horticulture Advisory Panel (HAP), the present Chair of the Plant Industries Biosecurity Committee, various PHA, DAFF and State biosecurity agency convened working groups, forums, and as an industry mentor and advisor to PBCRC projects including Myrtle Rust and Collaborative Planning.

Nursery Industry Biosecurity RD&E Programs/Projects (2016 - 2022)

Project	Funding	Project	Funding
National Nursery Industry Biosecurity Program	Levy	RD&E program for control, eradication and preparedness for Vegetable leafminer (VLM)	Levy
Building the resilience and on-farm biosecurity capacity of the Australian production nursery industry.	Levy	Improving Pest Management for the Nursery Industry.	Levy
Nursery Production Visual Training Resources	PHA	GIA Biosecurity Engagement Measures	DoA
Northern Australia Biosecurity Training Program	NT/DoA	Building plant health surveillance capacity in Australia’s nursery production industry project.	DoA
Tomato potato psyllid (TPP) Program Coordinator.	Levy	National Xylella Preparedness	Levy
Improving plant industry access to new genetics through faster and more accurate diagnostics using next generation sequencing	Levy	Improving preparedness of the Australian horticultural sector to the threat potentially posed by Xylella fastidiosa (a severe biosecurity risk)	Levy
Improving the biosecurity preparedness of Australian horticulture for the exotic spotted wing drosophila (<i>Drosophila suzukii</i>)	Levy	National Biosecurity and Sustainable Plant Production Project	Levy
Field based testing for fall armyworm & identifying parasitoids	Levy	Xylella coordinator & Improving preparedness	Levy
Next generation sequencing for post border diagnostics	Levy	Business continuity during biosecurity incursions	Levy
Review of Industry Biosecurity Plan	Levy	Improving on-farm surveillance strategies for tospoviruses/thrips	Levy
Resourcing, supporting and assessing biosecurity in nursery production	Levy	Xylella insect vector project	Levy

Sustainable funding and investment to strengthen biosecurity: discussion paper

Greenlife Industry Australia (GIA) takes this opportunity to provide the Department of Agriculture, Fisheries and Forestry (DAFF) with insight into the the adequacy of sustainable funding within Australia's plant biosecurity system. GIA supports this submission by highlighting the under preparedness, capacity and capability of Australia's domestic plant biosecurity system due to the systematic disinvestment across all levels of government over the past 25 years. It is not possible to disconnect that states and territories from our national biosecurity funding structure with GIA disappointed that this discussion paper aims to only focus on the Commonwealth Government.

GIA acknowledges the dedicated personnel across our plant biosecurity system who are struggling to provide the levels of service and meet their duty required under a failing system and in no way attributes our dysfunctional system to those operating within it.

It must be noted that over the past 25 years Australia has had a multitude of reviews, reports, forums, etc., addressing our biosecurity system and, over those 25 years, the same issues are raised, identified, agreed and noted yet very little changes for the good, particularly in the plant biosecurity system. The best known reviews include the Nairn review; *Australian Quarantine a shared responsibility* report in 1997 followed by the Beale review; *One biosecurity: a working partnership* in 2008 that noted almost identical issues as Nairn identified a decade earlier. It was no surprise to industry that when Craik's (2017) review of the Intergovernmental Agreement on Biosecurity (IGAB), *Priorities for Australia's biosecurity system*, carried the same themes and fail points and, importantly, the advice to make it better. In 2021 the Commonwealth Inspector-General of Biosecurity noted, again, the overall need for a more effective and sustainable funding of biosecurity. We have also had many state based reviews and reports including QLD, VIC, and WA all identifying these same short comings along the biosecurity continuum.

Discussion Paper:

- 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?**

For a more sustainable funding model government, at all levels, must first meet their obligations as many of the biosecurity functions are governments responsibility and a duty to the nation (public good) with many being a function of government only. It is important to note any consideration of funding models delivering over and above these statutory obligations must be captured and used within the biosecurity system, as opposed to government moving funds into consolidated revenue. Risk creators in many of the non-agricultural areas are not contributing their share in mitigating risk or managing the impacts from their biosecurity risks, therefore the future sustainable funding system must address this significant gap.

Consideration by government must be given to the other economic beneficiaries of a functional and well resourced biosecurity system such as tourism, environment, sport/gambling (e.g., horse racing). We

need to broaden our view on the impacts of pests that looks past the agricultural sector and consider those pests likely to impact on other sectors of the economy, identify the beneficiary and the risk creator, as agriculture is currently carrying a disproportional weight within the national economy.

Government must expand the use of third parties in areas along the biosecurity continuum and must recognise and incentive growers to adopt high health plant production thereby reducing risks and increasing preparedness. Opportunities exist to value add the implementation of grower based programs including governments driving supply chains to meet their biosecurity duty or obligation.

Primary producers are already overburdened with cumulative government induced costs (Productivity Commission Report 2016) and cannot be further weighted with more regulatory financial impediments particularly when most are also contributing to eradication costs under their respective national agreements (e.g., Emergency Plant Pest Response Deed) and industry RD&E via specific industry Levy's.

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

The risk creators and other sectors of the economy benefiting must contribute to the sustainable funding of the biosecurity system, therefore government must reconsider the 'Biosecurity Imports Levy' and expand this revenue to cover all travellers and the conveyance of all goods into Australia. Government has the power to capture all incoming goods, and people, in an appropriately structured legislative instrument(s) as well as other sectors of the economy through registration, taxes, etc. The mechanisms put in place to recover these funds are the responsibility of government and beyond the scope of GIA to propose in this submission.

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

The impact on 'others' is likely to be an increase in business costs however this burden is already impacting the agricultural sector, as a beneficiary, with many other elements of the economy not meeting their equal share of the benefit, or responsibility as a risk creator. Spreading the burden over the wider economy could result in the cost per business being very low or inconsequential however it may impact on some cost increases to agriculture on imported equipment, inputs, etc. The benefit to agriculture, and the nation, would see a sustainable and appropriately funded biosecurity system that reduces the risk of major plant and animal pests establishing and spreading across Australia, in some cases the very viability and sustainability of a sector hinges on this prevention and/or early detection and eradication.

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

The assumption that the only beneficiary to our national biosecurity system is agriculture is significantly flawed, as is failing to recognise the broader risk creators, with agriculture the only sector of the economy that has committed to funding pest incursion responses, RD&E and on farm risk mitigation. There are hundreds of pests that will impact on many areas of the economy minimally related to agriculture and of recent years we have seen this acknowledged through our biosecurity system embracing invasive species and environment as Parties within this space including the position of the Chief Environmental Biosecurity Officer with DAFF. Furthermore, consider Brown marmorated stick bug (BMSB), a pest assessed to have a low impact on agriculture compared to the environment and our way of life (homes/buildings/vehicles) yet the only sector of the economy to has contributed financially to eradicate BMSB is horticulture. The other beneficiaries in this case did not contribute nor did the risk

creator(s). The proportionality of funding is significantly biased with agriculture carrying a heavy burden (as a beneficiary) with significant risk creators not carrying their weight. A system that seeks funding from one sector of the economy ignoring other sectors receiving the same benefit cannot claim the system is proportionally funded.

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?

There are a constant flow of technologies, systems and opportunities to increase the efficiency and efficacy of the biosecurity system however the resources to recognise, implement and adopt need to be in place. Stating and highlighting investments, as per the discussion paper, does not translate to adoption and implementation within the system due to the nature of the system or due to funding ceasing or only in place to explore or recommend, not adopt and implement!

Through observations over many years it is apparent that most plant biosecurity agencies are barely capable of delivering their critical services let alone work to adopt and implement new systems or technology in a timely manner. Furthermore, legislative impediments or a lack of bureaucratic drive to advance our systems further impeded adoption and implementation of technology and systems by regulators, not just a lack of funds. Human resources are stretched thin across all areas of the system and internal structures often work against efficiencies and efficacy of effort such as rotating trained staff out of critical areas/entry ports e.g., import inspection, based on an internal policy. There are a number of strategies/policies that can be employed to improve efficiencies that do not require increased funding which are better, more valuable and rewarding for staff.

Third parties offer opportunities for increased efficiencies and flexibility outside of government that requires exploring in greater depth and implementing in faster timeframes. There are industry programs and resources that can deliver system efficiencies and reduce risks particularly when the 'buy in' from participants can be so positive due to integration into business practices. Industry can adjust/pivot faster than government therefore technology adoption, implementation, etc., is often years ahead of government, further improving the efficiency and efficacy of the system.

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

Many of the items addressed above provide some insight into improving the efficiency of the biosecurity system however the Commonwealth Government must embrace change and take the opportunities to be inclusive and use industry (plant industries) as a partner in finding solutions. Industry is willing to take on its responsibility however it must be a win win for all Parties and not a cost shifting strategy without benefit. Government must start valuing and incentivising the businesses that want to and are reducing biosecurity risks, those taking on their responsibility and contributing to the national biosecurity system, through supporting a national approach to these actions. Government also has a role in driving supply chains to value biosecurity systems and meet their biosecurity duty/obligations along with valuing those within the supply chains that are mitigating biosecurity risk.

The Commonwealth Government cannot sit back and ignore the states and territories as they are a major contributor to our national biosecurity system and the same resourcing issues exist, if not to a greater extent. The Commonwealth Government must take a leadership and facilitator role and any future and sustainable funding model cannot be at the exclusion of the states and territories.

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

Transformational change is required to effectively make the national and domestic biosecurity a sustainable, efficient and effective system as it has been clearly demonstrated the current system is barely capable of delivering as required and the reliance on appropriations funding is not an option. We also have the same pressures on the domestic system with many struggling to meet the required outputs particularly plant biosecurity. Biosecurity stakeholders continue to ask the same questions, report the same faults, shortfalls, issues and suggest the same solutions year after year, review after review, yet we are trying to fix a system that has moved past its use by date and is no longer fit for purpose.

Australian commonwealth and state/territory governments must elevate biosecurity to the status of a separate essential service, within their respective structures, appropriately fund the system and eliminate the threat of internal departmental funding redistribution and dividend payments. It is apparent that biosecurity has moved outside of just the agricultural sector with environment and invasive species having increased say on the system and priority setting. Creating a national statutory biosecurity body could be a path to a more efficient and streamlined system, provide greater opportunities to change, modernise and be adaptable to stakeholder needs. Step the body outside of the Departments of Agriculture and with base funding provided by the commonwealth and states, along with the above suggested funding streams, the body would be separated from political and bureaucratic influence, system and institutional bias and be constructed to fit the 21st Century.

Existing models of this type of solution already exist, to some degree, such as the Australian Pesticide and Veterinary Medicines Authority (APVMA) whereby the Commonwealth takes a national lead with State and Territories providing input/support along with compliance monitoring and enforcement.