SEAFOOD INDUSTRY AUSTRALIA

Seafood Industry Australia submission to the Department of Agriculture, Fisheries and Forestry on the Sustainable funding and investment to strengthen biosecurity discussion paper

December 1, 2022

ATTN: Secretariat, Sustainable Funding and Investment for Biosecurity, Department of Agriculture, Fisheries and Forestry

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Introduction

Seafood Industry Australia (SIA) welcomes the Review and the opportunity to provide feedback on the discussion paper on *Sustainable funding and investment to strengthen biosecurity.*

SIA is the national peak-body representing the Australian seafood industry as a whole. With members from the wildcatch, aquaculture and post-harvest sector, including state, territory and sectorial associations, along with seafood businesses and producers. We are the voice of Australian seafood.

Currently valued at more than $3.15 billion and directly supporting more than 17,000 Australian families (ABARES, 2021) and thousands more downstream in logistics and sales, the Australian seafood industry plays a key role securing Australia's food base, creating and maintaining jobs, boosting economic activity, and generating valuable export income for Australia and our rural and regional communities. Australian seafood accounts for 10 per cent of the national agricultural production.

Growth of our industry delivers increased jobs and investment in rural and remote Australia, and puts more than 1.5 billion meals of quality, healthy, sustainable seafood for Australian families and our international neighbours.

SIA provides consumers, Government and other stakeholders with confident and united representation.

Our mission is to Promote, Protect and Develop the Australian seafood industry on the national and international level. Our unity indicates that we love what we do, we stand by our products, and that our products are the best in the world.

Our Pledge

We are the Australian seafood industry, and we are committed to putting the best Australian seafood on your table now and for generations to come.

To ensure we do this in ways we are all proud of, we promise to:

- Actively care for Australia's oceans and environment and work with others to do the same;
- Value our people, look after them and keep them safe;
- Respect the seafood we harvest and the wildlife we interact with;
- Be transparent and accountable for our actions;
- Engage with the community and listen to their concerns; and,
- Continually improve our practices.

This is our pledge to you.

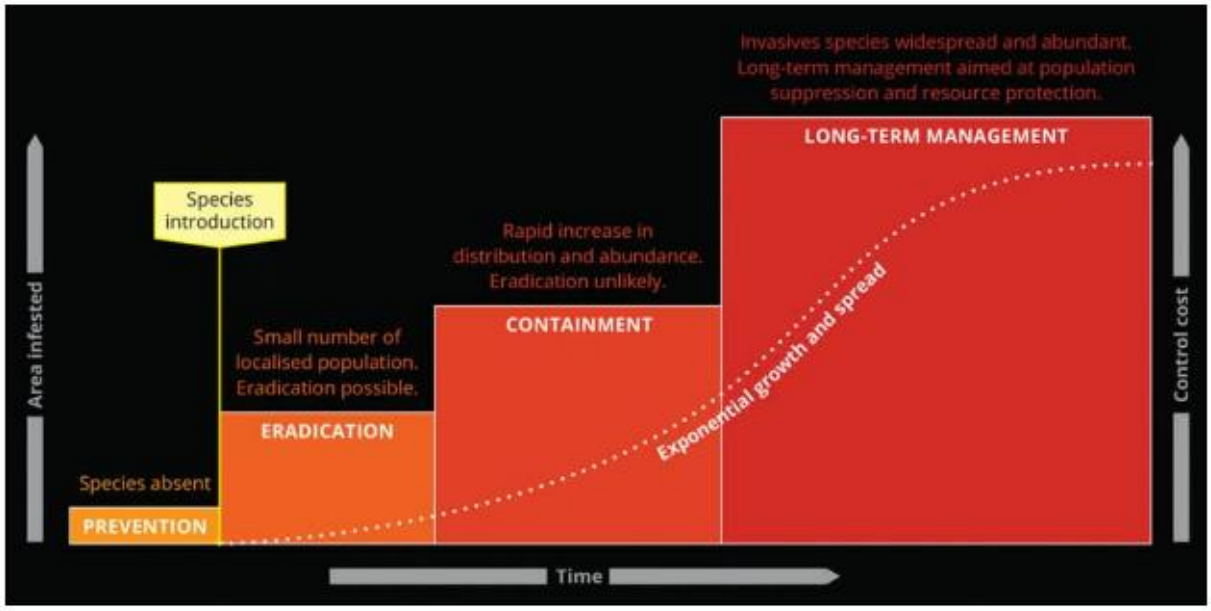
Overview

Setting the biosecurity scene

The maintenance of a comprehensive and effective biosecurity system is vital for the protection of Australia's agriculture and fisheries sectors. A plethora of international and domestic examples exist of biosecurity breaches resulting in the devastation of rural industries, export bans, reduced market access and national revenue, and long-term impacts on the world's food security. It is estimated that **invasive species have cost all Australian industries and government $390B in damages** in the last six decades (National Biosecurity Strategy, 2022). On top of this is foregone growth and missed market opportunities.

Research and experience shows the earlier an incursion is stopped, the higher the return on investment (see the Generalised Invasion Curve (Figure 1) below). Preventing an invasive species from arriving has a far higher return on investment than attempts to eradicate or contain.

Figure 1: Generalised Invasion Curve



The invasion curve explained (invasives.org.au)

Biosecurity within the aquaculture and wild-caught fisheries space is complex. Pests and diseases within shared waterways are extremely difficult to control, isolate and eradicate meaning the economic, environmental and social consequences as a result of incursions of exotic disease and pests carry well beyond the farm gate.

Additionally, with the exception of Salmonids, the overwhelming majority of species harvested in Australia are native species. The cost of exotic disease incursion will likely extend beyond economic loss, to loss of recreational amenity, impacts to First Nations' cultural values and food security, and impacts on natural ecosystems.

Response to questions within the 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?**

The basic principle that risk creators must proportionally pay for biosecurity measures should apply. Almost 70% of seafood consumed in Australia is imported (ABARES), much of it uncooked. Whole and eviscerated uncooked or frozen fish contain a substantially higher pathogen load and importation represents an increased biosecurity risk (Oidtmann et al. 2017). The equivalent importation of whole or gutted uncooked cattle, pig or poultry is not permitted due to biosecurity risks (Australian Barramundi Farmers Association, 2022).

For this reason, imports are considered by industry to be a significant risk creator to biosecurity. An example is White Spot Disease (WSD), an internationally notifiable crustacean disease detected in Queensland in 2016. The virus is highly contagious and infected all operational prawn farms in the area within a few months. The introduction of WSD in 2016 has since been attributed to a breakdown in border biosecurity (FRDC 2021).

Imported ornamental fish are also a pathway for exotic finfish diseases to enter Australia.
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With the above in mind, of the options flagged in the discussion paper, the seafood industry supports investigation into application of a combination increased government funding and of a biosecurity levy (for air and sea freight, conveyance or containers) applied on imported product ready for human consumption.

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

Industry recognises that Australia's biosecurity position must be based on the principles and international responsibilities described in the Biosecurity Act 2015 – namely to manage biosecurity to ensure a very low level of risk consistent with the Appropriate Level of Protection (ALOP). Australia's ALOP is expressed as providing a high level of sanitary and phytosanitary protection aimed at reducing risk to a very low level, but not to zero (Agriculture.gov.au, 2015).

Implementation of a biosecurity levy is not a new idea; a Biosecurity Imports Levy was recommended by the 2017 Independent review of the capacity of Australia's biosecurity system and in 2018 it was estimated that a $10.02 biosecurity charge per 20-foot container, and a $1 per tonne levy on bulk imports coming via the sea would generate $325 million over three years (Sullivan 2020). It's recommended the scope of this program should be expanded to capture air freight as much imported seafood which is ready for human consumption arrives via air. Policy changes in this area will obviously need to follow the standard Cost Recovery Guidelines traditionally used by Department of Agriculture, Fisheries and Forestry (DAFF).

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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?**

The main parties impacted by a levy on imported seafood products ready for human consumption will of course be importers. There are many potential benefits to be realised, as levies could be invested into targeted prevention programs (the highest return on investment) aligned with ALOP, supplementing existing government and industry investment.

Part of the risk of raw imported seafood products for human consumption is the possibility that pathogens and diseases they carry will enter Australian waterways where it is incredibly difficult to contain them. Possible transmission pathways include inappropriate disposal of fish offal, frames, or spoiled product or via use of imported product as bait by recreational or commercial fishers.

To reduce the risk associated with these pathways, measures compliant with ALOP relating to disposal can be developed, implemented and monitored and public awareness can be raised through targeted campaigns.

Regarding recreational fishers, banning the sale of imported product in bait shops and other similar outlets will help reduce risk. Appropriate sanitary measures for high-risk imported goods and taking additional prevention steps before and at the border will also assist. The risks are increasing, and monitoring and compliance measures are costly.
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4. **Is the proportionality between those who contribute to the funding system and those who benefit the most, right?**

Commercial fishers and aquaculture enterprises will of course suffer the brunt of economic costs in the event of biosecurity breaches. However, the impacts expand beyond those businesses to the broader Australian culture impacting recreational fishing, a national pastime for many, First Nations' cultural values, food security, and our natural ecosystems.

There are a number of industry initiated and funded programs in place already and industry are strongly engaged with AQUAPLAN, Australia's National Strategic Plan for Aquatic Animal Health (codeveloped between government and industry). The Plan outlines a strategic vision and seeks to guide investment to strengthen the national aquatic animal health system. Importers of products for human consumption, a potential risk creator, do not contribute financially to these activities. A fairer spread of the cost of prevention, eradication and containment would include contributions from importers of raw and unprocessed seafood products for human consumption.
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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?**

Regular assessment and adoption of technologies to determine country of origin and/or differentiate between farmed and wild-caught finfish commodities would reduce the pathway for exotic disease that exists through product substitution of aquaculture commodities that cannot be confirmed in imported product or prevented through testing and compliance activities.

eDNA technology may deliver efficiencies within the biosecurity landscape, particularly for monitoring and detection of exotic species.
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6. **How could the Commonwealth Government improve efficiency in the biosecurity system (consistent with meeting our Appropriate Level of Protection)?**

Regarding Australia's biosecurity measures with respect to foot-and-mouth disease and other notifiable diseases of terrestrial agriculture, the seafood industry would welcome the implementation of an equivalent ALOP and risk mitigation measures to protect the aquaculture and wild-caught fisheries sectors from exotic disease threats.
Word count: 43/200.

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

Early and genuine industry engagement in biosecurity management is essential. We urge regulators to recognise the unique and valuable insights industry can provide. Particularly regarding the development and implementation of protocols, cost-effective control methods and data sharing, monitoring and enforcement, and protection measures.

The Australian seafood industry supports collaborative strategic reviews of international trends and science to proactively identify and prepare for industry's next big threats. To this end we recommend a full and thorough review of out-of-date Import Risk Analysis (IRA) be completed, for example the Barramundi IRA is more than 20 years old, and circumstances have significantly changed in that time.

As a part of an ongoing review process to ensure regulation, legislation and policies are updated based on new research, these documents and processes should be streamlined to allow for more consistent and realistic implementation across and between borders both international and domestic. Simplification and streamlining of translocation policies and regulation to allow for risk assessed transference of genetic material and breeding stock would provide tangible and lasting economic benefits to seafood industries.
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Thank you

In conclusion, SIA asks the Department of Agriculture, Fisheries and Forestry (DAFF) to consider the recommendations raised in this submission.

SIA, on behalf of our members and the entire Australian seafood industry, would like to thank you for taking the time to review our submission. I welcome the opportunity to discuss any of our requests with you further and can provide more details if needed.

Finally, I would like to thank you in advance for your support of the future of Australia's seafood industry, and your commitment to biosecurity.

Yours sincerely,

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