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This submission is provided to:

Department of Agriculture, Fisheries and Forestry

Submitted online at https://haveyoursay.agriculture.gov.au/national-biosecurity-strategy-actions/survey

Our members

- Canegrowers
- Cotton Australia
- Queensland Fruit & Vegetable Growers
- Nursery & Garden Industry Queensland
- eastAUSmilk
- Australian Cane Farmers Assocation
- Queensland United Egg Producers
- Turf Queensland
- Pork Queensland

- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallawa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Lockyer Valley Water Users



QIFF QUEENSLAND FARMERS'

About the Queensland Farmers' Federation

The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

Submission

QFF welcomes the opportunity to provide comment on the draft National Biosecurity Strategy Action Plan.

We provide this submission without prejudice to any additional submission from our members or individual farmers.

Safeguarding Queenslanders from the impacts of biosecurity risks, including destructive and harmful pest animals, diseases and weeds, is integral to protecting the Queensland way of life, our communities and our economy. QFF welcomes the National Biosecurity Action plan and provides the following comments on gaps which if addressed, will make an impact on the effectiveness of Australia's biosecurity system to prevent, prepare for and manage the risks to agriculture and Australia's food security and way of life. QFF is calling for a commitment from government to invest in building biosecurity capability at a regional level, stronger co-designed partnership models, increased transparency, and a strategic approach to skill development in preparedness and response.

Priority Area 1: Shared Biosecurity Culture

QFF supports in principle the actions described especially the development of a Biosecurity
Business network program (IA1.4). It would be enhanced if it was connected back to the vision in
the National Biosecurity Strategy and the shared purpose articulated. Using the word community
in the foreword implies it is only for the public. QFF supports a shared understanding of the
importance of biosecurity for everyone but a more targeted communication campaign for the
higher risk entry pathways and practices would have better results.

Priority Area 2: Stronger Partnerships

Agriculture and human health are notable omissions with priority actions aimed at indigenous
Australians and environmental groups. From an agricultural point of view where the impact is
potentially massive, the omission of agriculture is hard to understand. Separate roundtables for
individual groups but not the whole does not make sense when it is essential that all groups
understand each other's priorities and work towards common goals. One Health, which is
fundamentally of huge importance, is not mentioned nor are partnerships with human health



counterparts which have taken the lead in responses such as Japanese encephalitis. QFF proposes that a roundtable be held with all the stakeholders, not just two groups.

QFF supports the actions relating to roles and responsibilities.

Priority Area 3: Highly Skilled workforce

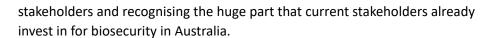
 QFF supports the actions proposed. This is a critical area for most agricultural industries. Action IA3.4 has the potential to make a difference given the reduction in capacity in government response teams in recent decades. A pilot trial of biosecurity responder training has been initiated in the pig industry in Queensland and may have potential to be customised for other industries.

Priority Area 4: Coordinated preparedness and response

- This is the area that will make the most difference if executed correctly and therefore requires the most input.
- The number of actions need to be expanded to include the suite of components that make up this priority area.
- There is no mention of diagnostic laboratory capacity or ensuring quality standards in laboratories. Surveillance is mentioned in the context of new technologies and existing strategies e.g. Northern Australia Quarantine Strategy but does not address the overall reduction in the submission of samples to laboratories over the past two decades due largely to workforce reductions and regional laboratory closures.
- The success of a response relies on early detection. A good performance indicator might be the
 percentage of new incursions that are declared endemic against the percentage eradicated.
 Many times, diseases and pests have been smouldering along for many years before being
 detected, particularly in the plant industries.
- A proactive approach to working more closely with industry and community to enhance on the ground delivery capablity in both preparedness and response including a commitment to support industry led priorities rather than a continued top down approach.

Priority Area 5: Sustainable investment

- There have been recent reviews on the sustainability of biosecurity funding. Initiatives such as the proposed Biosecurity Levy was introduced into parliament with no industry support or prior discussion to achieve common ground in definitions and strategies to achieve sustainable funding. This action plan has the opportunity to put that right. This will involve:
 - Developing a shared view of principles underpinning funding needs to be established before any reviews take place such as risk creators paying for the risk they create and redefining "beneficiaries" who do not create the risks.
 - Ensuring that proposed reviews of conducting a sustainable national biosecurity system are not simply focussed on transferring costs from the national system to other





- A whole of government commitment to elevate biosecurity across all
 portfolios and a commitment to work with industry and community to ensure we
 develop the capacity to prepare for and manage the expected increases in biosecurity
 risk is needed. QFF cannot agree for industry to be disproportionately funding
 biosecurity which everyone benefits from and are advocating for a fairer shared
 responsibility model moving forward.
- Action IA5.5 is supported: Increasing the transparency of biosecurity funding and evaluating return on investment are fundamental.

Priority Area 6: Integration supported by technology, research and data

- QFF agrees in principle with the actions proposed for technology, research, and data. However,
 the actions for actively sharing data are ambitious and unlikely to be comprehensive unless there
 are clear benefits for sharing. Researchers will want to hold off sharing their findings until they
 are published and diagnostic data sharing, even with origin details not disclosed, could be
 perceived to compromise businesses.
- An enhanced coordinated reporting system and a standardised scientifically based methodology
 may be a better approach. Also, data by itself is of little value unless it is interpreted, and
 jurisdictions could play a role in this by establishing standardised methods which would allow for
 a better understanding of what is happening across Australia.

Thank you for the opportunity to provide comment.	. Should you have any questi	ions, please contact
Dr Laurie Dowling at <u>laurie@qff.org.au</u> .		

Yours sincerely

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