



26 August 2022

Senator the Hon Matthew Canavan  
Senate Standing Committees on Rural and Regional Affairs and Transport  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600  
Via: [rrat.sen@aph.gov.au](mailto:rrat.sen@aph.gov.au)

**Re: Adequacy of Australia's biosecurity measures and response preparedness, in particular with respect to foot-and-mouth disease and varroa mite**

Dear Senator Canavan,

GrainGrowers is a voice for Australian grain farmers with grower members across Australia. We work to build a more sustainable and profitable grains industry for the benefit of Australian grain farmers. GrainGrowers welcomes this opportunity to provide a submission on the adequacy of Australia's biosecurity measures and response preparedness to the Senate Rural and Regional Affairs and Transport References Committee.

The Australian grains sector is a powerhouse of regional Australia with 22,000 farm businesses growing on average 45 million tonnes of grains, oilseeds and pulses each year for domestic and global customers. The Australian agricultural sector is striving to reach \$100 billion farmgate value by 2030, up from a current value of \$71 billion with the broader agribusiness supply chain striving to reach \$300 billion. As one of Australia's largest agricultural industries, the grains sector will be critical in reaching that ambitious goal.

Biosecurity is critical to support agricultural productivity, to protect Australia's agricultural industries, environment, human health, and social and cultural values and to support international and domestic market access for Australian grains. The control of weeds, pests and diseases already established in Australia costs Australian grain growers over \$5 billion each year. This includes the losses and costs of managing diseases at \$1.4 billion, weeds and herbicide resistance over \$3.3 billion and invertebrate pests over \$360 million.

It is important that the biosecurity system is trusted by industry and that there is confidence in its ability to operate effectively. If farmers have confidence in the system, they will be more inclined report suspicious organisms or diseases, they will be more inclined to play their role in putting

on-farm biosecurity measures in place and they will also take an interest in learning and preparing to deal with biosecurity risks. However, GrainGrowers Annual Policy Survey, which was undertaken in January this year and included over 600 grower responses, indicated that the confidence of growers in Australia's biosecurity system was mixed. Whilst 57% of respondents were extremely or moderately confident of keeping pests out of Australia, this fell to 40% being extremely or moderately confident of eradicating a pest in the event of an incursion and only 33% extremely or moderately confident of the management of a pest once eradication is no longer possible. A more recent follow up survey with a small number of members suggests that confidence has declined in the months since the Annual Policy Survey was undertaken, with a marked decline in those indicating they were extremely or moderately confident in Australia's biosecurity responses. Only 25% of the respondents in the recent survey indicated they were extremely or moderately confident of keeping pests out of Australia, 17% indicated they were extremely or moderately confident at eradicating a pest and 15% indicated extreme or moderate confidence that a new pest could be managed.

Our response to the inquiry terms of reference GrainGrowers has a number of key messages:

- The biosecurity system is faced with a continual churn of reactive activities and responses and is at risk of perpetually being on the back foot. For industries to have confidence in the operation of the biosecurity system there needs to be a 'reset' to establish an operating and resourcing model that can adequately respond to the dynamic and changing nature of biosecurity threats.
- The operational impacts and economic consequences of dealing with an outbreak of foot-and-mouth disease (FMD) in mixed farming systems and regions with both crops and livestock need to be better understood.
- It is best to address biosecurity threats before they reach the border, but once at the border the role of the States and Territories in addressing these national threats comes to the fore. In the face of multiple high priority threats there is the potential for States and Territories to become overwhelmed, jeopardising National industries.
- All aspects of the biosecurity system need to be underpinned by a culture of continuous improvement and shared learning, and recommendations from biosecurity reviews should be seen as opportunities to learn and improve rather than administrative hurdles to be cleared.
- GrainGrowers has concerns that some aspects of the biosecurity system's current operation exclude parts of industry, and this has the potential confuse messaging and undermine national coordination of biosecurity responses.
- The National Biosecurity Strategy sets out a vision for how all aspects of Australia's biosecurity system work together, and it is important that there is an examination of Australia's biosecurity system to ensure its design and operation is consistent with and can deliver against the National Biosecurity Strategy.

GrainGrowers response to the three inquiry terms of reference are covered below.

a) *the adequacy of Australia's biosecurity measures and response preparedness, in particular with respect to foot-and-mouth disease and varroa mite;*

The current biosecurity preparations in response to the threat of FMD and Lumpy Skin Disease (LSD), as well as the response to the incursion of Varroa Mite in New South Wales is being watched closely by all agricultural industries, both because of the threats they pose to our industries and regional communities but also the lessons that can be learnt on improving our biosecurity response.

An FMD outbreak would have significant implications for the grains industry, and there is a critical need for information to both understand the potential economic impacts from an outbreak and to inform industry's response. The last comprehensive study published by ABARES on the impact of FMD on Australian agriculture was undertaken in 2013<sup>1</sup>. The headline impact of a "large" outbreak of FMD was estimated to cost Australia \$50b over 10 years, and ABARES adjusted these headline numbers in 2022<sup>2</sup> to \$80bm over 10 years to account changes in industry conditions.

Since the 2013 ABARES study there has been a significant change in the feedlot industry and the production of feed grain to service this sector that were not accounted for in the early study. The experience of COVID-19 has also increased awareness of the impacts of shutdowns and supply chain disruptions and the need for these to be accounted for and actively managed.

It would be very useful for the 2013 study to be fully updated to account for:

- 1) changes in the approaches to how FMD might be managed;
- 2) understand impacts for industries that are operating in FMD management areas; and
- 3) understanding in-direct business impacts (e.g. transport and logistics industry, rural retail industry, social costs for communities).

Many grain farmers run mixed livestock and cropping enterprises, and livestock producers often adjoin grain farms. For this reason, and to avoid the economic and social costs of blanket shutdowns of farms, it is important that there is clear guidance so that these producers can operate their cropping enterprises in tandem with a FMD management response in their region or on their property.

GrainGrowers has sought and been provided with some advice from DAFF on how cropping enterprises might function, but the advice remains high level and there is the potential for confusion and uncertainty depending on how States and Territories implement the AUSVET Plan. There are likely to be a range of industries, including potentially sugarcane, cotton and forestry, that might find themselves in a similar situation.

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<sup>1</sup>[ABARES 2013 Potential socio-economic impacts of an outbreak of foot-and-mouth disease in Australia](#)

<sup>2</sup>[Direct economic impacts of a foot-and-mouth \(FMD\) disease incursion in Australia, An update of ABARES 2013 estimate - DAFF \(agriculture.gov.au\)](#)

A series of workshops and roundtable discussions including DAFF, PHA, AHA, States and impacted industries may assist in working through these issues to ensure there are consistent practical guidelines. Developing guidelines prior to a biosecurity response would reduce the response time, avoid confusion and improve outcomes for growers.

Industry has significant concerns that a State, or Territory, might have to manage multiple biosecurity responses to simultaneous incursions, for example Varroa mite and FMD or Khapra beetle, and that there would not be sufficient resources to mount a successful biosecurity response. The current Varroa mite response underway in New South Wales has highlighted the critical role States and Territories play in responding to a biosecurity incursion. It is important to recognise the pressure these resources can be put under, and that the rest of Australia is relying on a successful response by New South Wales to ensure national freedom from Varroa mite is maintained.

With changes in biosecurity risk profiles the increased potential for States and Territories to respond to multiple incursions needs to be considered and planned for. This would help to ensure that we can avoid the long-term impacts to Australia's economy and our rural industries caused by an inability to cope with surges in biosecurity incursions.

It is important that there are National learnings from the on-the-ground biosecurity response by States and Territories when they respond to incursions. These experiences can improve the response of other States and Territories and it is important that learnings can be incorporated into the national biosecurity system. The Inspector General of Biosecurity plays an important role in the review and analysis of the pre- and at-border biosecurity activities, and there is an opportunity to learn from or extend this model to include working with States and Territories to understand and learn from their experiences responding to incursions.

Whilst there appears to have been considerable progress made in supporting the Indonesian Government's response to the FMD outbreak and improving Australia's at border biosecurity measures there is still considerable concern and doubt within the farming community about Australia's readiness for dealing with FMD incursion.

It is important that the preparatory work to ready Australia for potential FMD incursions continues and there are clear plans in place that work with and empower farmers and their respective industries to take ownership of and manage the risks. Effective communication needs to be underpinned by industry trust and confidence in the biosecurity system, which needs to be an ongoing area of attention and cannot be built during an incursion response. Clear proactive communication by government that responds quickly to concerns raised by industry and can engage through social media in real time will be useful to allay fears and counter misinformation.

Measures need to be considered that can support the mental health on farmers managing farming enterprises during an incursion response, along with consistent response strategies that minimise disruption to the operation of farms and rural communities.

b) *response to and implementation of previous reports into biosecurity;*

In the past five years, there have been a number of reviews examining Australia's biosecurity response including: the Craik Review (2017)<sup>3</sup>, the review by the Inspector General of Biosecurity on the adequacy of the Department's operational model to effectively mitigate biosecurity risks in evolving risk and business environments (2021)<sup>4</sup>, and the Australian National Audit Office's (ANAO) performance audit report on the Department's response to non-compliance with biosecurity requirements (2021)<sup>5</sup>. These reports have indicated that Australia's biosecurity system is not keeping pace with the demands of the logistical environment, and this is a cause for concern in industry.

The 2021 report on "Accountable implementation of Inspectors-General of Biosecurity review recommendations"<sup>6</sup> indicates that "the department has approached Inspector-General recommendations as an administrative, rather than transformative, process" and notes that there has been a "lack of accountable and timely implementation of responses to recommendations". GrainGrowers believes that in the face of an environment where biosecurity risks are changing and potentially increasing, industry is best served by a pro-active biosecurity system that is responsive, adapts and learns from past experience and embraces a culture of continuous improvement. In the same way that we see the Emergency Services review their preparation and response efforts in light of emergencies such as floods and fires we expect those involved in the biosecurity system to embrace a culture where their systems and efforts are continually reviewed and that they seek insights and have the resources that allows the systems to improve.

The recent development and release of the National Biosecurity Strategy provides an opportunity to 'reset' and reposition Australia's biosecurity system so that it has the culture, facility and resources to serve Australia into the future.

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<sup>3</sup> [Intergovernmental Agreement on Biosecurity \(IGAB\) review panel \(2017\) "Priorities for Australia's biosecurity system"](#)

<sup>4</sup> [Inspector-General of Biosecurity \(2021\) "Adequacy of department's operational model to effectively mitigate biosecurity risks in evolving risk and business environments"](#)

<sup>5</sup> [ANAO \(2021\) "Responding to Non-Compliance with Biosecurity Requirements"](#)

<sup>6</sup> [Inspector General of Biosecurity \(2021\) "Accountable implementation of Inspectors-General recommendations \(2015-2021\)"](#)

*c) any related matters.*

GrainGrowers recognises that biosecurity is a whole-of-community responsibility and we have sought to develop stronger relationship and greater engagement with Australian Government stakeholders on issues relevant to at-, pre- and post-border biosecurity. The biosecurity threats to our industry are potentially devastating, with the potential damage from a widespread incursion of khapra beetle could cost the nation \$15.5 billion over 20 years with the loss of a number of key markets. We have been frustrated by the barriers that exist which limit industry engagement in the biosecurity system and reduce industries effectiveness in supporting the biosecurity system.

There needs to be a culture of communicating openly, clear and transparent expectations about how industries bodies perform their roles to support the biosecurity system, and clarification around confidentiality and the extent to which industry consultation can occur in the event of an incursion.

GrainGrowers has concerns that aspects of the biosecurity system, for example the membership structure of Plant Health Australia, exclude broad industry and community engagement in biosecurity preparedness and response. We believe that this situation is inconsistent with the recently announced National Biosecurity Strategy. GrainGrowers had applied to become an associate member of Plant Health Australia (PHA) to better engage with the biosecurity system and ensure our members are represented and informed in Plant Health Australia fora. Unfortunately, our application was not supported by Plant Health Australia members, and we believe that this is a poor outcome both for our members and for the plant industries more broadly. This demonstrates that there is the potential for parts of an industry, or even small industries with limited resources, to be excluded from biosecurity planning and responses. This has the potential confuse messaging and undermine national coordination of biosecurity responses. We currently engage with Plant Health Australia through informal mechanisms as best we can.

The current arrangements should be examined to determine if they serve in the national interest and ensure that the arrangements are consistent with the vision for national biosecurity arrangements set out in the National Biosecurity Strategy.

### **Conclusion**

GrainGrowers supports the work undertaken by the Australian Government in response to the threat of FMD and urges government to pay similar attention to the threats facing Australia's plant based industries. There are many lessons to be learnt from the current situation, and the biosecurity system needs to adopt a culture of continuous improvement in order to evolve and adapt to the changing biosecurity threats that face our industries.

Should you require any further information, please contact GrainGrowers' General Manager for  
Policy and Advocacy, \_\_\_\_\_ or

Yours sincerely,

Brett Hosking  
Chair  
GrainGrowers