



6 July 2023

Committee Secretary
Senate Standing Committees on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600

Via: rrat.sen@aph.gov.au

Re: Biosecurity Amendment (Advanced Compliance Measures) Bill 2023 [Provisions]

GrainGrowers supports the intent of the Biosecurity Amendment (Advanced Compliance Measures) Bill 2023, and the need for biosecurity compliance measures that are adapted to the evolving biosecurity environment. It is important that Australia has appropriate measures in place to serve as a deterrent to potential offenders, as well as the systems and support in place to enable compliance activities to be undertaken.

GrainGrowers would like to make two broad observations regarding implementation of the Biosecurity Amendment (Advanced Compliance Measures) Bill 2023. These are:

1. It is important that Australia's biosecurity system has appropriate performance indicators in place to understand if the new compliance measures have been effective; and
2. There must be appropriate resourcing to process intelligence and understand biosecurity threats, enforce the compliance measures and prosecute infringements.

Performance indicators

Biosecurity is of critical importance to the Australian agricultural industries and strict measures to uphold Australia's biosecurity and support compliance are appreciated by industry. Public reports that quantify biosecurity infringements are an important tool in raising awareness of the importance of biosecurity. However, greater transparency and accountability related to the work of the government on biosecurity would help evaluate the success of these measures while improving industry and public confidence in the biosecurity system. This could also assist in driving a culture of continual improvement within the biosecurity system.

GrainGrowers' Annual Policy Survey collects responses from over 600 growers and helps inform GrainGrowers' policy agenda. In 2022 and 2023 a question was asked regarding attitudes towards biosecurity. In January 2022 57% of respondents were extremely or moderately confident of keeping pests out of Australia. In January 2023 this response remained steady, decreasing only slightly to 56%. However, the 2022 year was characterised by significant efforts by government to address threats from Foot and Mouth Disease (FMD) and Lumpy Skin Disease (LSD) with a very public response put in place. It appears that the high-profile biosecurity effort did little to change confidence for those 'on the ground' in rural Australia. A set of performance measures for Australia's biosecurity system is needed to better understand its success in informing the compliance effort. Without public

performance reporting it is not possible to understand the extent to which compliance has avoided or deterred incursions and if the situation is improving or getting worse. Significant public and cost recovered funds are being directed towards this issue, with limited transparency and accountability of the benefits being delivered. It is important that there is a system of continuous improvement that underpins the delivery of biosecurity outcomes, but there currently appears to be no way of measuring it.

Appropriate Resourcing

For the Bill to be effective, it will need to be enforced. Whilst the Bill is reported to have no financial impact on the Australian Government Budget there will be implications for resourcing of compliance activities and applying penalties. The biosecurity funding arrangements announced in the 2023 Budget play a critical role in ensuring that the Australian Government has the appropriate resources to undertake these compliance activities, and to understand and manage the risks pre- and at- border.

This Bill is focussed on addressing biosecurity risks created by travellers and importers. The recent Frontier Economics report on Sustainable Funding for Biosecurity¹, published by the Invasive Species Council, highlights that:

“While the appropriate cost recovery mechanism will vary depending on a range of issues, as ‘impactor pays’ is the approach that most closely links the costs of providing the service with the user of the service, from an economic perspective funding ideally should be sought from impactors first...”

The development and implementation of a risk creator/container levy was proposed in the 2017 Craik Review². Whilst the 2023 Budget announcement highlighted that work to evaluate a risk creator levy was currently being undertaken by government, the agricultural industries are still waiting on the outcome of these deliberations. Whilst cost-recovered inspections may pay for the policing of the compliance activities at the border, it is important that there is appropriate resourcing for work to understand the biosecurity threats and develop pre-border measures to prevent biosecurity risks from reaching Australian shores.

Appropriate resourcing for biosecurity compliance needs to be informed by meaningful performance indicators. In the absence of clear targets and objectives around biosecurity and compliance it is difficult to understand if the measure has been effective and appropriately resourced. While GrainGrowers supports the Biosecurity Amendment (Advanced Compliance Measures) Bill 2023, we seek assurances that it will be implemented in a way that delivers its intended outcome.

GrainGrowers would welcome the opportunity to discuss these issues further with you.

Yours sincerely,

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GrainGrowers

¹ [2023-05-02-Assessment-of-biodiversity-funding-mechanisms.pdf \(invasives.org.au\)](https://www.invasives.org.au/2023-05-02-Assessment-of-biodiversity-funding-mechanisms.pdf)

² [Intergovernmental Agreement on Biosecurity Review - DAFF \(agriculture.gov.au\)](https://www.daff.gov.au/intergovernmental-agreement-on-biosecurity-review)