

SEAFOOD INDUSTRY AUSTRALIA



**Seafood Industry Australia submission
to the Rural and Regional Affairs and
Transport Legislation Committee's (RRAT's)
inquiry into the Agriculture
(Biosecurity Protection) Levies Bill 2024
[Provisions] and related bills Senate inquiry**

10 April 2024

Submitted online [here](#) on 10 April 2024

About SIA

Seafood Industry Australia (SIA) is the national peak-body representing the Australian seafood industry as a whole. With members from the wild catch, 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 \$3.5 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.

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.

Submission recommendations

1. SIA does not support application of a Biosecurity Protection Levy on the 5,000+ species within the Australian seafood industry.
2. SIA recommends a delay of possible application of the Biosecurity Protection Levy to the Australian seafood industry until the *Futures of Seafood* study is delivered and this policy decision can be mapped against cumulative impact to industry. The federal government, through its support of the study, has acknowledged the desperate need for better data and insights to forecast policy impact on the seafood industry's longevity.
3. Impact assessments and forecasted return on investment projections for the whole of agriculture, fisheries and forestry be completed before implementation to inform the proposed levy's structure.
4. Government must provide information on the purported trade impediments that have stalled the progression of the Container Levy, as recommended in [the 2017 Independent review of the capacity of Australia's biosecurity system](#).

Introduction

SIA welcomes the opportunity to provide a submission to the Rural and Regional Affairs and Transport Legislation Committee's (RRAT's) inquiry into the Agriculture (Biosecurity Protection) Levies Bill 2024 [Provisions] and related bills Senate inquiry.

While we welcome the government's commitment to developing a sustainable biosecurity funding model to support and protect Australia's many vibrant agriculture, fisheries and forestry industries, our members oppose the introduction of the government's Biosecurity Protection Levy (BPL, Levy). The Australian seafood industry recognizes the national importance of a well-functioning biosecurity system and has invested heavily itself in this objective. However, we have serious concerns regarding the construction of the BPL.

Futures of Seafood

The Australian seafood industry faces continued, increasing economic pressure from a variety of sources including competition for ocean access, increasing compliance obligations, climate change and the cumulative impacts of government policy.

Industry, governments and the community need to collectively understand the social, economic, environmental and governance values associated with the industry to understand the impact of decisions that change ocean access, what the breaking points are as well as what can drive growth opportunities and business certainty.

Recognizing these challenges, SIA has successfully campaigned for initiation of the [Futures of Seafood](#) study. This program is a novel study that will describe, map and model the spatial, economic and social impacts of government targets and decisions, including but not limited to:

- offshore energy zones and proposals,
- marine parks and environmental regulation,
- oil and gas,
- desalination plants,

- tourism and recreational use and rocket launch pads.

With this knowledge, the people and businesses that support Australian seafood can make decisions and plans around the potential impacts to their future. This is also what government needs to make informed policy that achieves an inclusive and sustainable future.

SIA was extremely excited to secure a funding commitment from Australian Government's Department of Agriculture, Fisheries and Forestry (DAFF) and Department of Climate Change, Energy, the Environment and Water (DCEEW) toward the ground-breaking *Futures of Seafood* study.

SIA urges government not to take any preemptive action, such as application of the BPL, to apply more economic pressure to wild caught and aquaculture businesses without the insights of the Futures of Seafood program, as this could have disastrous impacts on generations to come.

The federal government, through its support of the *Futures of Seafood* study, has acknowledged the desperate need for better data and insights to forecast policy impact on the seafood industry's longevity.

SIA position summary

SIA does not support application of the BPL on the 5,000+ species within the Australian seafood industry.

The Australian Seafood Industry does not object to the BPL on the basis of simply not wanting to contribute more to the biosecurity systems. Our industry already proactively contributes significant amounts to biosecurity systems and efforts. The Australian Seafood Industry supports opportunities to invest in actions that deliver tangible and additional biosecurity outcomes.

SIA raises the following concerns regarding the BPL's construction:

1. The likelihood of a range of negative unintended consequences for agricultural and biosecurity systems;
2. The transparent use of the collected funds to deliver dedicated, additional and tangible biosecurity outcomes;
3. Timeframes for development and implementation;
4. The lack of recognition of existing producer contributions to the biosecurity system; and
5. The need for increased contributions from risk creators, including containerised imports.

These concerns form the basis of SIA's position on this matter. Since submissions were called for in October 2023, reports into the Levy have been published by several organisations including the Australian National University (ANU), the Productivity Commission, the Office of Impact Analysis (OIA), and Frontier Economics. All reports similarly highlighted the Levy's poor policy design. More information regarding these reports is provided below.

Further, SIA raises the following seafood industry specific concerns regarding the BPL:

1. More than [5,000 seafood species](#) are harvested and farmed in Australian waters – not including the emerging seaweed industry. Of those, only the farmed prawn industry has an existing national levy structure already in place. Calculating fair and equitable levy rates and collection points for all target species, let alone non-target species, will be extremely difficult to achieve by the government's 1 July 2024 deadline.
2. Seafood supply chains do not necessarily include obvious product aggregation points (and thus levy collection points) such as meat processing plants and fruit packing sheds. Significant product volume is sold directly into food service or direct to the public.

3. A single catch for a wild catch fisher may include as many as 25 different species (target and non-target species) with huge variance in value and volume. Expecting a small business to calculate and pay separate levy rates for each one will place undue stress and cost on those operations and be difficult and costly for the department to audit.

More broadly regarding biosecurity, SIA supports and advocates for:

- Early and genuine industry engagement in biosecurity management.
- Recognition of industry insights, data and practical experience by key decision makers.
- Collaborative strategic reviews of international trends and science to proactively identify and prepare for industry's next big threats.
- Compliance systems backed by:
 - Processes to rectify and deter non-compliance.
 - An expansion of post border surveillance and import pathway traceability systems to allow for real time risk management.
- Application of nimble policy, regulation and legislation using current science, technology and information to enable effective coordinated responses to biosecurity threats.
- While still managing perceived risk, regulation, legislation and policies should be streamlined to reduce confusion, bolster business confidence and promote consistent policy implementation.
- The implementation of mandatory, scientifically proven biosecurity procedures for imported products.
- Recruitment, retention and training of key personnel within the biosecurity workforce must be prioritised by government and research institutions.
- Ongoing and effective communication and extension programs must be maintained targeting key stakeholders.

Parties sharing aquatic resources

Commercial fishers and aquaculture producers share ocean (and inland) resources with a number of other stakeholders who share a responsibility for biosecurity. These include recreational fishers, indigenous fishers, the shipping industry and renewable energy to name a few.

What's different about the Australian seafood industry?

The Australian seafood industry's structure and huge range of entities sharing a resource mean that programs and systems designed for terrestrial based industries often are not fit for purpose for our stakeholders. Below are some examples of fundamental differences of the Australian seafood industry vs our terrestrial cousins.

Shared waterways

Biosecurity within the aquaculture and wild caught sectors is complex. Pests and diseases within shared waterways are extremely difficult to control, isolate and eradicate meaning that the economic, environmental and social consequences as a result of incursions of exotic disease and pests carry well beyond the farm gate for example to impact recreational fishing, First Nations' cultural values, food security, and our natural ecosystems.

Imports vs exports

Presently Australia exports about 70% of its agricultural production and imports only about 10% of its food¹. In stark comparison, Australia imports around 70% of its seafood and exports just 30%. This means the seafood industry's risk profile and risk creators are vastly different. Strong biosecurity,

¹ <https://www.agriculture.gov.au/abares/research-topics/food-demand>

particularly at the border, is incredibly important for the safety of our domestic seafood industries. Our fishers and aquaculture producers take this very seriously.

Existing levy structures

Unlike many of the terrestrial based industries, the seafood industry has only one national levy in place already; farmed prawns. We do not have any other existing levy structures which the BPL could be tacked onto.

Number of species and complicated supply chains

There are more than 5,000 (mostly native) species of seafood caught and farmed in Australian waters. Setting up fair and equitable levy rates, collection points and structures by the government's deadline of 1 July 2024 will be extremely difficult and this is a significant concern for industry.

Not only does our industry harvest and farm hundreds of species, but the wild catch sector must also deal with by-catch (harvest of non-target species). These species may also then be sold into the domestic or international market and should therefore also be subject to a levy in a fair and equitable system. In practice however, this will be hard to achieve.

A wild catch fisher may be harvesting as many as 25 species of differing volumes and vastly different market value on any given day. Availability of these species is also often seasonal, and species harvested will change throughout the year. Calculating and paying different levies on all of these differently valued species will add significant cost and time to both the fisher's business as well as the department's auditing branch.

Adding to this cost and complexity is the complicated nature of our supply chains. Individual fishers may sell their huge variety of catch direct to the public or directly into food service. Unlike horticulture and livestock, there are limited common product aggregation points such as fruit packing houses and meat processing plants in the seafood supply chain. This complexity will add to the levy collection and auditing costs of the department.

Native species

Unlike many terrestrial based industries, our fishers and aquaculture producers are harvesting and farming, for the most part, native Australian species. These species often have strong links to both the culture and enjoyment of the recreational fishing sector and the long heritage of our First Nations people. This means there is a different values-based system at play within the seafood industry. Government, as the public's representatives, has a responsibility to protect and preserve Australia's native species for generations to come. This includes protection from biosecurity related risks.

Key concerns with the construction of the Biosecurity Protection Levy

Negative unintended consequences

SIA supports National Farmers Federation's (NFF) assertion that the BPL will likely result in several unintended impacts to existing programs across agriculture, forestry and fisheries.

Agricultural levy structures

While we understand efforts are being made by government to establish the BPL separate to the existing industry levies regime, levy payers will likely not draw this distinction. This is understandable given that the policy explicitly links the quantum of levied funds to the amounts contributed by producers for their industry levies. It is only reasonable that levy payers may conclude the proposed levy does not accord with established agricultural levy principles that underpin their confidence in, and support for, that framework. For example, a lack of any input into how the BPL will be invested, which is a fundamental component to the ongoing operation of agricultural based levies.

Emergency animal/plant disease response agreements (EADRA and EPDRA)

A number of terrestrial based industries are signatories to EADRA and EPDRA (known as Deeds), which spell out all party's financial obligations in the event of an exotic disease incursion. These industries are already proactively contributing to biosecurity via those Deeds (when enacted) and other proactive industry initiated and funded activities. **The department, through implementation of the BPL may see over time an erosion of industry support for the Deeds as those industries question why they are 'paying twice'.**

Transparency regarding the use of funds

It is critical that clear and transparent reporting be provided from the department on the return on industry's investment into this funding model. Allocation of funds raised to general revenue, not linked to specific biosecurity outcomes is deeply concerning to industry.

In addition to the change of levy basis, the government invited industry stakeholders to participate on a Sustainable Biosecurity Funding Advisory Panel, announced as the BPL legislation was introduced to Parliament. Increased transparency and industry involvement in Australia's biosecurity system has been a long-standing ask of the agricultural sector. While SIA was pleased to be invited to sit on this Panel, the lack of detail or formal terms of reference for the Panel leaves us unclear of the Panel's remit, or influence.

It is critical that those fishers and aquaculture producers contributing to this funding model are able to make recommendations regarding its investment. A number of scientifically based recommendations have already been made to assist in improving biosecurity processes at the border, and these are for the most part, yet to be addressed. More information below.

We acknowledge that since initial industry consultation, the government has changed the basis of the Levy to a model based on the Gross Value of Production (GVP model). For every 1% of gross agricultural, fisheries and forestry production, an industry will contribute a total of \$500,000 towards the Levy. For some industries, the GVP model will result in more significant payments from smaller farm businesses (e.g. in some horticultural and likely seafood industries). There has been no industry consultation on the GVP model.

Timeframe for development and implementation

SIA holds significant concerns regarding the rushed policy development and timeframes for implementation of this proposed levy. As outlined by government, it's expected that the Levy will be in place and functional by the 1st of July 2024.

Industry remains unclear on the total revenue to be raised through the Levy, with the government and media citing differing figures. The government has asserted that the BPL will generate revenue to contribute six per cent of the costs of sustainably funded biosecurity system, however it is not clear what the sustainability funded biosecurity system budget represents or how this may fluctuate or change over time. Further, we are unclear on specific details of the calculation of individual industry's levy rates or collection methodology, in regulation or otherwise.

We call particular attention to the submission by the Australian Livestock & Property Agents Association (ALPA), which practically demonstrates the issues and complexities arising from the government's implementation timeframe. ALPA cite strong concerns with the additional administrative and economic burden the BPL will place on collection agents, highlights the underestimated complexity of determining appropriate imposition points in well-established and

diverse supply chains, and notes the lack of available information or guidance to agents, who will have an obligation to collect the BPL, come 1 July 2024.

Further, the Office of Impact Assessment (OIA) has advised that the policy has failed to meet the requirements to be considered 'good practice'. The OIA advised the Department - before the policy was committed into the budget - that to be considered 'good practice' within the Government's Impact Analysis framework, the impact assessment would have benefitted from:

- *Further analysis of impacts, including quantification of costs, justification of costings, and description of qualitative impacts; and*
- *Further description of consultation, including the range of stakeholders consulted and areas of agreement and disagreement on the options.²*

Given the Biosecurity Protection Levy is a policy that will impact the majority of Australia's 80,000+ fishers, aquaculture and terrestrial producers across all commodities, in addition to many supply chain participants involved in levy collection, and be underpinned by stand-alone legislative and regulative frameworks, **adequate time for both policy development and implementation is critical.**

SIA urges the Department to consider if the current timelines are appropriate and make the necessary changes.

Recognition producer contributions

The seafood industry has a long history of proactively investing in biosecurity practices. Since 1998 investment has been guided by [AQUAPLAN](#), Australia's National Strategic Plan for Aquatic Animal Health which was developed with government and industry. It outlines a strategic vision and seeks to guide investment to strengthen the national aquatic animal health system. Effective implementation of the tactics outlined in AQUAPLAN is essential to strengthening Australia's biosecurity system.

Within AQUAPLAN 2022-2027, approximately \$781,565.00 in funding has been attracted to date (pers communication DAFF Sept 2023). The previous iteration, [AQUAPLAN 2014-2019](#) attracted over \$3.5 million in direct investment.

Activities prioritized for funding have included extension and education programs for all ocean users including recreational fishers, the shipping industry and commercial fishing/aquaculture businesses. Commercial businesses have been supported in writing and initiating biosecurity plans, training via mock incursion exercises and implementing surveillance programs.

Individual businesses also invest heavily in biosecurity already, see [example](#).

SIA on behalf of its members recently developed a [Biosecurity Position Paper](#) which outlines industry's primary pain points and recommendations for improvements.

In addition to the above programs industry has repeatedly and proactively sought to engage with government to improve identified biosecurity risks and gaps in their systems. Examples include:

- Submissions Australian Prawn Farmers Association (APFA) and Australian Barramundi Farmers Association (ABFA) submissions to the Standing Committee on Agriculture and Water Resources: Inquiry into the Australian Aquaculture Sector in 2021. These submissions touched on:

² 2022, Impact Analysis – Second Pass Assessment – Biosecurity Sustainable Funding, Department of Prime Minister and Cabinet, Office of Impact Analysis, pg.1.

- The risk of current import controls will fail to protect the industry including use of out-of-date import risk analysis (IRA) which do not account for new and emerging material disease risks.
- Gaps on mandatory requirements to decontaminate imported product and appropriately dispose of processing waste.
- Lack of methods in use to categorically determine the country of origin or differentiate farmed and wild-caught whole and eviscerated barramundi (as an example).
- Results of independent surveillance studies which demonstrate that the current controls are failing and continuing to expose developing industries and wild stocks.
- Submissions to the Review of the biosecurity risks of prawns imported from all countries for human consumption.

For the most part, these concerns and submissions are yet to be acted on/responded to by the relevant government departments.

Beneficiaries vs risk creators

SIA notes the Government's emphasis on characterising biosecurity funding as pivoting towards more of a 'beneficiaries pays' system. Australian agriculture is undoubtedly a beneficiary of a strong biosecurity system. As noted earlier, it has underpinned our sector's competitive position both domestically and abroad and will be critical to achieving our future sector aspirations. For these reasons industry invests hundreds of millions of dollars annually in proactive biosecurity activities that deliver tangible outcomes.

However, the sector is also a significant biosecurity 'risk bearer'. While recognising we do not operate in a zero-risk environment, fishers and aquaculture producers often directly bear the cost of biosecurity failures. More so than other stakeholders such as importers, the shipping industry and recreational fishers. Once pest and diseases establish or become endemic, fishers and aquaculture producers internalise significant costs into their business operations. It is estimated that the annual costs of weeds, pests and diseases to Australian agriculture is in excess of \$12 billion.

The ANU and the Productivity Commission separately assessed the Levy funding model and found: *"The first critique questions why primary producers are singled-out as beneficiaries of biosecurity. In reality, the benefits of biosecurity extend to the broad community. Where public benefits exist, funding is normally drawn from general revenue streams. Second, the report highlights that the policy rationale for additional intervention is unclear. Third, there is potential for individual sectors to face levy costs which exceed the benefits they receive. The report also highlights that if we consider biosecurity to be a sectoral public good, it is unlikely to be funded at a lower cost by an industry levy than it is through general revenue. Further, there is widespread industry opposition to the Levy, which suggests that biosecurity is not a sectoral public good, as the policy suggests."*³

These reports suggest that the proposed Levy is an inefficient funding model that unfairly targets primary producers. The ANU expands upon this view by suggesting there are two existing versions of optimal policy which could be utilised to fund biosecurity:

"From a first principles perspective, there are two versions of optimal policy in this case, both of which are already in place. The first approach is to charge those who create the externality. Biosecurity threats can cause harm to the environment, animal or plant health, and human health on a nationally

³ 2024, The biosecurity protection levy: Principles for Design, Tax and Transfer Policy Institute, The Australian National University, pg. 3.

significant scale, and usually arise as a result of the activities of parties such as importers and travellers (DAFF 2015). Because the market does not capture the cost of biosecurity hazards, a tax on those who create the most biosecurity risk could be introduced to align the marginal private cost with the marginal social cost, creating an efficient market outcome.

Alternatively, biosecurity can be viewed as a public good, with biosecurity protection representing a benefit to all Australians through environmental protection, food-security, and disease risk mitigation. If viewed as such, biosecurity protection activities can be justifiably funded through general revenue, i.e. through all of the members of Australian society. If set at the appropriate level, the tax will correct for the social benefits provided by biosecurity, thus eliminating the deadweight loss associated with the externality, creating an efficient market outcome.”⁴

The reports by the ANU and the Productivity Commission support the premise that as primary producers are not responsible for creating biosecurity risks, they should not be forced to subsidise risk-creating industries.

Decades of reviews have identified that risk creators, such as importers, have a clear responsibility to contribute commensurate with their risk profile. As noted in the Craik review:

*“Much of the material of concern to the national biosecurity system, including of environmental concern, arrives via vessels and containers—either in the contents of the container or on the external surfaces of the container itself”.*⁵

As noted by Frontier Economics:

*“From an economic perspective, the funding hierarchy for biosecurity requires that funding be first sought from risk creators/impactors, then beneficiaries, and finally, government”.*⁶

The Australian seafood industry’s risk profile is vastly different to terrestrial. With close to 70% of product being imported, this means one of our main risks arises from imported product. Our fishers and aquaculture producers have no control over this risk, it lies solely with the government’s border enforcement services and policies.

There is a view that fisheries and aquaculture are not being protected at the border as effectively as terrestrial industries. For example, no bone in pork products can be imported due to disease risk, yet whole, uncooked or frozen fish which can contain a substantially higher pathogen load are imported. Additionally raw offal from these fish runs the risk of gaining access to aquatic environments. Transmission pathways are often unknown and/or unmanaged. There is a view that the risk to other sectors (recreational, indigenous livelihoods, tourism and ecosystem) are not fully considered in risk assessment, noting that with some exceptions nearly all aquaculture species are native.

Australia’s aquaculture and wild caught fisheries sectors have already faced numerous biosecurity breaches including the detection of White Spot (WS) an internationally notifiable crustacean disease in Queensland in 2016. The virus is highly contagious and infected all operational prawn farms in the

⁴ 2024, The biosecurity protection levy: Principles for Design, Tax and Transfer Policy Institute, The Australian National University, pg. 4.

⁵ 2017, Priorities for Australia’s biosecurity system: An independent review of the capacity of the national biosecurity system and its underpinning intergovernmental agreement, Department of Agriculture and Water Resources, pg. 120.

⁶ 2023, Sustainable funding for biosecurity – an evaluation of funding options, Frontier Economics, pg. 30.

area within a few months. Unfortunately, the introduction of WS in 2016 has since been attributed to a breakdown in border biosecurity (FRDC 2021).

Recreational fishers unfortunately also represent a significant risk to biosecurity, beyond the control of the commercial industries. This stems both from access to imported diseased and contaminated bait used in our waterways and their gear and equipment acting as a vector due to poor biosecurity controls and procedures.

Conclusion

We reiterate that the Australian seafood industry does not object to the BPL on the basis of simply not wanting to contribute more to the biosecurity systems. Biosecurity is an issue the Australian seafood industry takes incredibly seriously. Our industry has taken proactive steps to improve both their own on ground practices and knowledge as well as make scientifically based recommendations to government to improve national biosecurity systems. We support opportunities to invest in actions that deliver tangible and additional biosecurity outcomes.

Further, the Australian seafood industry is not supportive of stopping trade. We acknowledge the international WTO rules surrounding trade and recognise there is a market for imported seafood due to often lower price points. However, the application of appropriate biosecurity measures to mitigate the risk of imports is required.

Thank you

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.

Yours sincerely,

CEO, Seafood Industry Australia Ltd

Email:

Phone:

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