

BIOSECURITY CRIS

Proposed changes to biosecurity fees and charges

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Australian Seed Federation
SOWING SEEDS

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Proposed changes to regulatory charging for biosecurity activities

The members of the Australian Seed Federation are at the foundation of Australia's \$75 billion agriculture industry. Our membership covers the full seed supply chain and includes plant breeders, seed growers, seed processors and seed marketers. We are great advocates for a strong and sustainable biosecurity system in Australia and recognise the increasing pressure the system has been under the past few years.

Like many other industries, the Australian Seed Federation supports the aspiration of implementing a long-term sustainable biosecurity funding model. However, that sustainable funding must be sufficient to support a biosecurity system which is not only effective, but efficient and remains that way well into the future.

Any cost recovery measures must be applied in a way as to reflect both the assessed risk of the cargo, as well as the appropriate costs of screening, management, or destruction of potential biosecurity incursions.

In short, members of the Australian Seed Federation do not want to contribute more for no gain.

System improvements required

Clearance times of seed imports have fluctuated over the past five years. After an improvement in 2019, COVID caused significant delays. Resulting recruitment issues due to a widely acknowledged workforce shortage has been one reason timeframe trends have not returned to an upward trajectory.

While we understand that biosecurity officers have had priorities of Varroa mite and foot-and-mouth disease prevention to contend with, the continued border clearance delays the seed industry continues to encounter are unsustainable.

Border clearance or seed import inspection delays impact the entire seed supply chain, including leading to increased transportation and freight costs. These cost and time impacts flow on to growers who work under strict seeding timeframes. Seed should be treated as a perishable commodity as delays can affect germination and seed quality.

The Australian Seed Federation has long offered to work constructively with government to co-design a biosecurity system that maintains appropriate timeframes for imported seed inspections and border clearances.

The seed industry is at a disadvantage due to a lack of biosecurity officers trained in seed assessments. There are reports of there being as few as one or two biosecurity officers working to assess seed imports in Brisbane. This lack of resourcing can result in weeks-long delays.

Seed inspection is a specialised skill. The seed industry is brimming with expertise and is willing to be an active partner in seed education to assist the department to train up more biosecurity officers for seed inspections.

The Australian Seed Federation launched an industry-recognised learning hub in late 2022, the Seed Industry Professional Program. A training module has already been created to cover seed import and export from a company perspective. The Australian Seed Federation would gladly work with the Australian Government to make this module fit-for-purpose and available for biosecurity officers.

It is worth noting too that whilst it's critical to have more biosecurity officers trained in seed inspections, the charge rate should be commensurate with expertise, given that those with less experience take longer to complete an inspection. Companies used to have the option to book inspections at a day rate which was both more efficient for the department and more cost effective for companies. This is no longer available.

Members of the Australian Seed Federation have repeatedly expressed their frustrations at the portal system which rather than improve timeliness of biosecurity inspections, has led to further delays, frustrations, and inefficiencies. There are reports of biosecurity officers waiting in cars for hours for the portal to clear them to do a job which could have been completed in 15 minutes.

Inefficiencies are also seen regarding Approved Premises approvals. A small business and member of the Australian Seed Federation has an Approved Premises used almost exclusively to test ISTA proficiency samples. To achieve that Approved Premises status requires the submission of a range of documents. The process can take up to 120 days. This small business has been regularly audited and has been without issue.

They are now undertaking a building fit-out. Their existing approval room will be moved from the lower floor to the upper floor. The move does not require any transfer of biosecurity material outside of the confines of the building. The transfer could happen entirely under the supervision of a Biosecurity Officer.

All of the required documentation to move the already Approved Premises room has been submitted and they've been told the department still require the 120-day process period.

This means there is a purpose made room that cannot be used and the existing room which will be repurposed to a pathology laboratory cannot happen either.

Process for process-sake has huge consequences for businesses. Delays of this magnitude are completely unreasonable, especially when there is an easy solution proposed. Industry pays for these departmental inefficiencies.

Members of the Australian Seed Federation have also suggested the Department of Agriculture, Fisheries and Forestry mirror the plant export Authorised Officer (AO) program for plant imports.

The proposed changes to fees and charges for biosecurity activities will very likely not address these systemic issues. The department must consider a broader review of the system enshrined in principles of co-design.

Post entry quarantine

The most significant price increases relate to post entry quarantine which has been named by the department as the most “under-recovered” for several years.

While this increase would impact all sizes of businesses, adequate consideration must be given to smaller businesses importing nursery stock. Such a steep increase is unsustainable and with this comes the risk that illegal importation will increase.

A cost increase cannot be so large that it excludes companies from importing product or preferencing another export market over Australia. This would not only harm businesses and limit choice for Australian consumers and growers, but also lead to a decrease in demand for biosecurity services which would negatively impact the cost recovery.