



QUEENSLAND
FARMERS'
FEDERATION



Biosecurity in Queensland: a review of the prohibited and restricted matter lists

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Prepared for

Biosecurity Queensland, Department of Primary Industries

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This submission is provided to:

Biosecurity Queensland, Department of Primary Industries

Submitted via email: bqconsultation@dpi.qld.gov.au

Our members

- Queensland Fruit & Vegetable Growers
- Cotton Australia
- Canegrowers
- Greenlife Industry QLD
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Pork Queensland
- Australian Chicken Meat Federation
- 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

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 this submission on Biosecurity in Queensland: a review of the prohibited and restricted matter lists. We provide this submission without prejudice to any additional submission from our members or individual farmers.

Overview

The value of regulated lists of restricted and prohibited matter to industry includes mandatory reporting and decisions made about the biosecurity matter to limit their impact on agriculture and the environment. QFF supports regular review of these lists to ensure that the risk created by this matter is proportionate to the cost of measures taken to control them.

QFF notes in briefings that many of the changes are based on a precautionary approach in order to get ahead of biosecurity matter that might develop into state-wide problems. While this is a commendable approach, it is important that changes do not impose extra costly burdens on agriculture especially if the risk is low, is not a problem now and is based on overseas data, not Queensland conditions.

Specific concerns

Infectious laryngo-tracheitis

Infectious laryngo-tracheitis (ILT) is a deadly disease of poultry that is partially controlled by vaccination. In unvaccinated birds, it can cause severe losses and being air borne, quickly spread through sheds. The danger to the poultry industry is if it is delisted as proposed, then the normal responses of notification, and movement controls, particularly in the fancy bird industry which go to multiple shows, would not be mandated thus proposing a high risk to poultry establishments. The reason given for its de listing is that it is endemic but there are many other examples on the restricted list that are also endemic. ILT is not that common that would constitute an administrative burden on reporting it and is uncommon precisely because it is listed as restricted matter which trigger control measures to reduce, control and contain the disease.

Recommendation: Infectious laryngo-tracheitis remains as restricted matter and not delisted.

Dingoes

Dingoes are proposed to be classified as dogs with the result that they can be kept as pets and be regulated by local councils just like other dogs. QFF has concerns around this proposal as there is currently a problem with domestic dogs being pets and being allowed to roam at night in rural communities, killing livestock and then returning home as the household pet. This is a common occurrence and if dingoes with their natural hunting instincts are domesticated, it is likely to exacerbate the wild dog problem.

Dingoes are not considered able to be domesticated with their strong, instinctual prey drive, retention of wild behaviours, unpredictable behaviour, complex needs and unique genetics and breeding. They are not simply a different type of dog.

A recent scientific article by Cairns et al from the University of New South Wales (August 2025) says that there are multiple lines of evidence in support of 4 criteria to be considered a distinct taxonomic unit from domestic dogs.

Cairns, KM, Letnic, M, Ritchie, EG, Adams, JW, Crowther, MS, Dickman, CR, Filios, M, Pascoe, J, Smith, BP and Newsome, TM. Taxonomic tangles posed by human association – the urgent need for an evidence-based review of dingo and domestic dog taxonomy and nomenclature. *Australian Mammalogy*, December 2025, Volume 47, Issue 3
<https://connectsci.au/am/article/47/3/AM24052/199699/Taxonomic-tangles-posed-by-human-association-the>

Recommendation: There should be no change to the current regulation of dingoes.

Non-native Rubus species

It is acknowledged that blackberries are known to be invasive and are already included on the restricted matter list. The pest risk assessment done by the Queensland government relates primarily to blackberries and including raspberries in the proposed schedule seems to be a precautionary approach in the new regulation.

Concerns are:

- Will this prevent the berry industry from bringing in new varieties?
- Will the permit system have requirements that become expensive to ensure that the bushes do not propagate into the surrounding environment or animals/birds accessing to potentially spread seed?

Recommendation: More information is needed on the impact of this decision. If commercial raspberries have existed without spreading into the surrounding environment, QFF proposes that there be no reason to change as otherwise costs would not be competitive with other states that do not have this legislation. Restriction on sales is supported.

Yours sincerely

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