



QUEENSLAND
FARMERS'
FEDERATION



Sunset Review of Queensland Biosecurity Regulation
2016 Primary Production Food Safety
May 2026

Prepared by
Jo Sheppard, CEO, QFF
E: qfarmers@qff.org.au

Prepared for:
Department of Primary Industries

Contents page

About the Queensland Farmers' Federation	2
Submission.....	2
Introduction	2
Summary of key principles and recommendations.....	2
Key Recommendations.....	3
Stakeholder input	3
Proposed Changes	3
Conclusion	5

This submission is provided to:

Queensland Biosecurity Regulation 2016 Sunset Review
Department of Primary Industries (DPI)

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
- Mallowa 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 comment on the *Sunset Review of Queensland Biosecurity Regulation 2016 Primary Production Food Safety*.

We provide this submission without prejudice to any additional submission from our members or individual farmers.

Introduction

The Queensland Farmers' Federation (QFF) welcomes the opportunity to provide feedback on the Sunset Review of the Queensland Biosecurity regulation 2016. The discussion paper is a very comprehensive document and it is appreciated that this has been preceded by stakeholder consultation meetings. However, it is a concern that many of the proposed changes have not previously been consulted with stakeholders in the early consultations and therefore responses now may not had time to fully consider the impacts of these changes. In this response QFF has responded via core principles and examples in the regulation changes where this may apply.

Summary of key principles and recommendations

Core Principles

- 1. Regulatory measures should be time-bound and reviewable**
Restrictions introduced for biosecurity responses should include clear review and expiry periods to ensure they remain necessary, proportionate, and evidence-based.
- 2. Industry consultation must inform regulatory change**
Changes affecting industries should be developed in consultation with impacted stakeholders to ensure practical implementation and avoid unintended consequences.
- 3. Biosecurity regulation should be evidence-based and nationally aligned**
Proposed standards, contaminant levels, and disease notification requirements should align with current scientific evidence, national frameworks, and practical risk management outcomes.

- 4. Notification systems must remain practical and risk-focused**
Reporting obligations should balance early detection with operational practicality to avoid overwhelming the system with low-risk or non-specific notifications.
- 5. Diagnostic governance should support early detection, consistency, and affordability**
Any expansion of regulated diagnostic testing should consider impacts on laboratories, producers, testing costs, and disease surveillance outcomes.
- 6. Biosecurity reforms require transparency, coordination, and adequate resourcing**
Effective implementation depends on clear governance, properly defined responsibilities, stakeholder engagement, and sufficient resourcing.

Key Recommendations

1. Ensure all biosecurity restrictions include defined review or expiry periods.
2. Consult directly with affected industries before implementing changes to biosecurity zones or other significant regulatory amendments.
3. Align contaminant thresholds and feed standards with current national and international scientific guidance.
4. Refine notifiable disease requirements to ensure reporting obligations are practical, targeted, and risk-based.
5. Assess the cost and surveillance impacts of expanding regulated diagnostic testing requirements.
6. Strengthen governance, coordination, transparency, and resourcing across biosecurity systems.

Stakeholder input

Many of the proposals have the statement that no consultation on this proposed change has been done. While it is appreciated that there has been extensive meetings with a wide range of stakeholders, the large volume of legislation to be reviewed has possibly missed some stakeholder input. For example, the change in the levels of allowable aflatoxin B1 in dairy feeds has increased by 10 times and appears to be out of step with current European guidelines. Situations like these need further discussion and clarification. QFF requests further clarification with industries specifically affected by these proposed changes as outlined in the recommendations.

Proposed Changes

Removal of outdated restrictions

Many restrictions are put in place for incursions that need these regulations in order to eradicate or control the disease/pest. Exotic disease incursions will be time limited as the disease/pest is either eradicated or declared endemic after a relatively short period of time. Rather than creating regulations indefinitely, all restrictions should be limited to a time period after which a fresh review and application to either extend or repeal. This would mean that you would not need to be considering them at a sunset review as it would happen automatically.

Long standing endemic diseases and pests such as fire ants and cattle ticks would necessarily have longer timeframes.

Statewide entry restrictions: QFF agrees in principle with the proposed amendments.

Biosecurity zones: QFF has no issue with the current proposed zone changes provided specific industries have been consulted to determine the impact of any change.

Recommendation: Ensure all biosecurity restrictions include defined review or expiry periods.

Recommendation: Consult directly with affected industries before implementing changes to biosecurity zones or other significant regulatory amendments.

Contaminant levels in stockfeed

While Australia does not prescribe a single national maximum limit for aflatoxin B1 in dairy feed, industry practice commonly applies conservative thresholds consistent with international guidance (approximately 5 µg/kg AFB1) to support compliance with aflatoxin M1 limits in milk. This is equivalent to 0.005mg/kg, much less than current guidelines and what is proposed (i.e. a tenfold increase from 0.02 to 0.2 mg/kg) The article referenced in the discussion paper could not be found. As aflatoxin B1 in feed converts to aflatoxin M1 in milk, a potent carcinogen, this change requires validation before it is changed in the regulation. One questions how the original level was said to be a typographical error, as industry and the public need to absolutely rely on figures supplied by the government in regulations.

Recommendation: Align contaminant thresholds and feed standards with current national and international scientific guidance.

Supporting comment: Rather than making a decision on a single scientific paper, QFF recommends ensuring that the level regulated for is consistent with current national and international standards. The potential impact on cow health, human safety and export markets is a key consideration. The level proposed appears to be much higher than what is considered safe internationally.

Changes in notifiable diseases

The proposed additional symptoms for exotic bee viruses are overly broad and risk capturing almost every sick bee. Indicators such as dead bees at hive entrances or bees unable to move are not sufficiently specific to exotic diseases. While early detection is important, notification requirements must remain practical to avoid overwhelming the reporting and diagnostic systems and creating unnecessary investigation costs. A more targeted approach would be to require notification only when a threshold of sick/dead bees is reached and an expert confirms a suspect diagnosis or a need to exclude

Recommendation: Refine notifiable disease requirements to ensure reporting obligations are practical, targeted, and risk-based.

Diagnostic testing (proposed arrangement to expand scope and clarify approval process)

The 'Diagnostic testing' part of Chapter 2 ensures that diagnostic test kits or methods for exotic animal diseases, as defined in Schedule 11 of the Biosecurity Regulation, are appropriately restricted and subject to approval so that biosecurity decisions and responses are based on reliable and authorised evidence.

QFF supports consistent diagnostic testing standards across laboratories, noting that this is generally achieved through NATA accreditation. However, further clarification is needed before extending regulation of diagnostic tests to all notifiable terrestrial and aquatic diseases. The current system, where positive results are verified through the ACDP (Australian Centre for Disease Preparedness), is considered effective. Expanding regulation would impose significant costs on non-government laboratories, likely increasing fees for farmers and discouraging sample submissions, which could undermine early disease detection outcomes.

Recommendation: Assess the cost and surveillance impacts of expanding regulated diagnostic testing requirements to notifiable diseases.

Supporting comment: It is imperative to ensure that correct diagnoses are made on diseases and pests which will require a regulatory response. However, this does not mean that the system cannot work effectively through a preliminary diagnosis made by a non-government lab that then has to be verified by an appropriately accredited state or national laboratory. This happens now and it is questioned why the need for this is being proposed. Consider the ramifications on biosecurity detection if this is to be introduced.

Conclusion

This is a very comprehensive review however, the impacts of proposed changes needs to be reviewed in some key areas, notably contaminant levels in feed. In early discussions with the Department, QFF was advised that some areas were out of scope for this review. This included:

Allowing insect based feed to be used for poultry feed. The barrier now is that insects may be in contact with animal material and hence may be considered indirectly as restricted animal feed. However in Europe, they are encouraging the use of insects as feed because it has a lower carbon footprint. Queensland and Australia should be at the forefront of these innovative practices and not lagging the world to produce affordable, safe and profitable food industries.

QFF looks forward to future consultation and collaboration with the Department in ensuring a risk based, scientifically validated regulatory system that enhances biosecurity outcomes in practical ways.

Yours sincerely

Jo Sheppard

Chief Executive Officer



This submission is provided by the Queensland Farmers' Federation

PO Box 12009 George Street, Brisbane Qld 4003
Level 8, 183 North Quay, Brisbane Qld 4000
ABN 44 055 764 488

Contact QFF

E: qfarmers@qff.org.au
P: 07 3837 4720
W: www.qff.org.au

