



QUEENSLAND
FARMERS'
FEDERATION



National Biosecurity Reforms June 2026

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

Prepared for:
Department of Agriculture, Fisheries and
Forestry

Contents page

About the Queensland Farmers' Federation	2
Submission.....	2
Introduction	2
Recommendations	2
Part 1 - Overall reform prioritisation and sequencing	3
Part 2 - Proposed reforms by theme.....	4

This submission is provided to:

Department of Agriculture, Fisheries and Forestry (DAFF)

Submitted via email at biosecurityreform@aff.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 National Biosecurity Reforms.

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

Introduction

Overall, the discussion paper is sound; however, its connection to the current suite of Biosecurity strategy documents is not clear, (National Biosecurity Strategy 2022 – 2032, the National Biosecurity Strategy Implementation Plan, the National Biosecurity Strategy Action Plan and the National Biosecurity Strategy: Monitoring, Evaluation, Reporting and Improvement Framework).

If there is a need to reframe priorities due to changing circumstances (as every good strategy should), it would have been clearer to align and link it back to these existing documents and change them accordingly. A strategy necessarily outlines a common vision and a pathway to achieve that vision. Clarity and alignment is critical to this. While these reforms are presenting a different set of strategic priorities and themes with some being repeated, the end result is confusing. Detailed comment on the discussion paper follows.

Recommendations

1. Include early detection (both pre and post border) as a key reform in Preparedness. It is arguably the single most effective strategy to limit or prevent the impact of incursions.
2. Include a national surveillance strategy to support early detection, particularly harmonisation of approach by jurisdictions and partnerships with industry.

3. Include a follow up discussion paper on data sharing, traceability for plants and funding proposals. It is not possible to give an assessment of the impact on agricultural industry unless options are proposed and impacts can be considered.
4. Include information sharing in a response as well as data. During a response, information is limited to deed signatories and those farms/organisations and supply chain stakeholders who are not signatories remain ignorant of a threat on their doorstep until it breaks in the media.
5. Include a reform theme on driving a whole of government, whole of community, whole of industry approach to develop a more effective shared responsibility and shared delivery model. A proactive focus is required to engage with industries outside of agriculture to help all businesses understand the risk biosecurity poses to their own businesses and measures they can implement to protect themselves. Without this reform, biosecurity protections will continue to be delivered without buy in or engagement from across community and industry and the agriculture sector will continue to do the heavy lifting alone.

Part 1 - Overall reform prioritisation and sequencing

1.1 Do the proposed reform themes adequately address the strategic risks?

The Australian Agriculture Ministers have agreed on **6 strategic risks** to the biosecurity system. Strategic risks were not specifically addressed in the Biosecurity Strategy however, changing or increasing risks were. While there is some alignment, there are some differences as well. The new risks include social licence and legislation and policy while older risks such as changing land use including the interface of urban and non-urban areas (important in One Health) are not mentioned.

This change of risk perspective is confusing. QFF agrees all of the risks articulated are valid. However, there are two risks that stand out as critical. The first, not mentioned at all in the risks, is early detection (both at the border and post border) This can make all the difference between either prevention entirely or containment of a small outbreak as compared to an uncontained catastrophic outbreak which can destroy businesses, farms, and regional and national economies. The second is capacity which is addressed in this reform discussion paper. Funding is important but should not be considered a strategic risk – funding should be an underlying principle on which government agrees to mitigate the biosecurity risks to agreed levels between jurisdictions, industry and the general public.

The 7 themes in the biosecurity reform discussion paper are sound and it is pleasing to see that preparedness, response and recovery are given their own themes as compared to the priority themes in the Biosecurity Strategy where they are bundled together and are just one of 6 priority areas.

It is odd that there are no themes described for two of the strategic risks mentioned including social licence and global factors and instability. If they rate as being two of the 6 strategic risks by the Agricultural Ministers, it is strange that there are no themes around these risks.

1.2 How should the reform themes be prioritised and why?

All are important. However, as previously said, early detection is key and under the preparedness theme, there is no mention of a national surveillance strategy. There is a lot of work to be done here from laboratories through to jurisdiction harmonisation to a science based approach that gives statistical confidence that diseases and pests have not been missed.

Part 2 - Proposed reforms by theme

Theme 1 - Preparedness

The four medium term reforms for delivery 2027 -28 include jurisdiction uplift (capability), national biosecurity threat assessment, national surveillance data sharing agreements and uplift of the databases for cattle, sheep and goats. The longer term reforms for delivery 2029-2032 include on farm and business preparedness program action plans for identified risks including an annual exercise, progress legislative changes to support surveillance data sharing and the development of a national traceability database for plant products.

These proposals are less comprehensive than what is in the current biosecurity strategy action plan covering these same areas. What is missing is a national surveillance strategy. QFF sees this as the Achilles heel in an otherwise robust biosecurity system that Australia has in place currently. More detail is required on the data sharing and what the scope of that is. It is certainly a priority for jurisdictions to harmonise and share their surveillance data. If this is extended to non-government areas, privacy and commercial in confidence might be valid reasons why some stakeholders may not wish to pursue this pathway.

The plan to introduce traceability for plants is an ambitious one given the diversity of the plant industries. More information is needed on what is the intent here and how it would be executed. If there is traceability in plants, what about the carriers of fire ants and pests and diseases and their destinations.

2.1 How should these reforms be prioritised

The priority should be early detection and a national surveillance strategy, neither of which are included in these reforms.

2.2 Gaps

The gap is early detection and a surveillance strategy.

2.3 Data sharing

This needs a discussion paper in itself to explain what is being thought about. As before, commercial in confidence and privacy are factors that need to be explained, especially if there is intended legislation around this.

However, what is more important is communication of confirmed pests and diseases as soon as possible. While farms and businesses have biosecurity, there is always room for that extra enhancement of biosecurity if there is a threat in play. For example, on farm training may be brought forward or refresher courses done, checking of perimeters and barriers etc. Currently, notifications only go to deed signatories. This is a problem if you are a key part of the biosecurity

chain but because you are not a signatory, you are ignorant of an impending threat. Too often, it is first heard through the media rather than a confirmed government source.

Theme 2 - Response

The proposed reforms in this sector are too broad to comment on. The Biosecurity Action plan gives a lot more detail and practicality. The plans for both animals and plants are good and a positive in knowing what can and can't be done in a response. However there needs to be flexibility built into the system so that new information can be taken on board especially if a better outcome is likely. For example, destruction methods have to be in the plan and you can't use better and more humane methods until it goes through a number of working groups and committees to say it is ok. Responses move fast and being more flexible in a rapidly evolving situation is key to better outcomes.

Theme 3 - Recovery

QFF supports a biosecurity recovery process being developed – the quicker a business can get back to production, the less impact it has. The current avian influenza outbreak in the United States have refined their responses so that businesses can get back to business in 30 days for poultry farms. In Australia, in the recent avian influenza outbreak recovery times took up to 6 months. Recovery time is critical for farms, businesses and communities. Fast food outlets are a primary youth employer and an outbreak would have a large impact on youth unemployment if chicken or beef was unavailable or in short supply.

Theme 4 - Workforce capability and capacity

QFF supports the intent of aligning evidence-based workforce actions to guide education, training and vocational organisations. There is however a high turnover of staff in some industries and while enormously helpful, this aspect of capability should not be relied upon as a major component of a biosecurity response.

Theme 5 - Operational capability and capacity

These reforms are focussed on research, indigenous knowledge, data and assessment. however, it is but one component of a complex system. Comments include:

- Specifying that research should not be duplicated is too prescriptive. Results from a single experiment can vary from region to region, scientist to scientist and season to season. There are a lot of unknown variables that only become apparent when implemented often. A robust science approach should allow duplication to ensure that results are repeatable and robust.
- National capability assessment including infrastructure and technology is fully supported.

Theme 6 – Legislation and regulation

This theme is important but should be a foundational way of doing business with best practice reviews and harmonisation. Minimising duplication and unnecessary impact on farmers and businesses as well as trade barriers could be achieved through regular consultation with stakeholders.

Theme 7 – Funding

Funding is focussed on alternative national funding mechanisms. However, the paper does not outline options that may be being considered. Is it the biosecurity levy again, a shift towards agriculture paying more, risk creators (e.g. importers paying more (government has been reluctant to go down this path to date) or something else? It would probably be advantageous to discuss all of these options for a sustainable funding model; however, it would be critical for industry to be involved in these discussions.

Conclusion

The biosecurity reforms presented are in principle sound however, for clarity of intent and how it fits in with the National Biosecurity Strategy and accompanying papers on implementation, action plans and evaluation, this needs to be made much clearer. If it varies to the extent that it is hard to follow, perhaps a revamped strategy needs to be developed.

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

