



# QUEENSLAND FARMERS' FEDERATION

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## Submission

18 March 2022

National Biosecurity Strategy Team  
Department of Agriculture, Water and Environment  
GPO Box 858  
CANBERRA ACT 2601

Dear National Biosecurity Strategy team

### Re: Consultation Draft National Biosecurity Strategy

The Queensland Farmers' Federation (QFF) is the united voice of intensive and irrigated agriculture in Queensland. It is a federation that represents the interests of 21 peak state and national agriculture industry organisations and engages in a broad range of economic, social, environmental and regional issues of strategic importance to the productivity, sustainability and growth of the agricultural sector. QFF's mission is to secure a strong and sustainable future for Queensland farmers by representing the common interests of our member organisations:

- CANEGROWERS
- Cotton Australia
- Growcom
- Nursery & Garden Industry Queensland (NGIQ)
- EastAUSmilk (formerly QDO)
- Australian Cane Farmers Association (ACFA)
- Turf Queensland
- Queensland United Egg Producers (QUEP)
- Queensland Chicken Meat Council (QCMC)
- Bundaberg Regional Irrigators Group (BRIG)
- Burdekin River Irrigation Area Irrigators Ltd (BRIA)
- Central Downs Irrigators Ltd (CDIL)
- Fairbairn Irrigation Network Ltd
- Mallowa Irrigation Ltd
- Pioneer Valley Water Cooperative Ltd (PV Water)
- Theodore Water Pty Ltd
- Eton Irrigation Scheme Ltd
- Pork Queensland Inc
- Tropical Carbon Farming Innovation Hub
- Queensland Oyster Growers Association (QOGA)
- Lockyer Water Users Forum (LWUF).

QFF welcomes the opportunity to provide comment on the Consultation draft for the National Strategy. We provide this submission without prejudice to any additional submission from our members or individual farmers.

*The united voice of intensive and irrigated agriculture*



**SUBMISSION**

**1 SCOPE OF THE STRATEGY**

Do the proposed vision and purpose reflect what we want to achieve and how we want to evolve our system into the future?  
 Are our 6 priority areas where we should focus our efforts in the future? Is anything missing?

**QFF Comment:**

**The vision** proposed is very broad and does not indicate the scope of what it includes. There is no mention of agriculture, and it is not clear whether it is all encompassing including things like furniture borers or companion animal diseases or human and environmental outcomes. While it does not need to be exclusively agriculture, it is the primary sector which is impacted in a major way, and which has further impacts all along the supply chain including employment and food shortages. Agriculture should therefore be specifically mentioned in any vision statement.

**The purpose** mentions protecting people and environment first and again there is no mention of agriculture. The QFF supports the proposed risk-based system underpinned by science. Is it necessary to include the word “shared” in the purpose title? If everyone agrees on the purpose, then there is no need to say shared.

**Priority Areas** are positive initiatives, but they are not balanced. The most critical priority to get right is the coordinated preparedness and response. This could be divided into 3 parts, early detection, prevention and response including recovery. Each of these areas is huge and in recent years, many gaps have emerged which need to have focus. Investment by government has declined, particularly surveillance and investment will need to be substantially increased in the face of increasing threats. By making preparedness and response just one of 6 priority areas, it diminishes its importance and reduces its claim for resources. Getting this right however is the single most important factor which will determine how well Australia overcomes its threats.

Other areas are important but could be combined. While funding is important, it does not really belong as a strategic area. It should be one of the guiding principles of how biosecurity operates rather than a strategic priority.

Specific comments on the Consultation Draft proposed priorities can be found in the below table.

AREA	AIM	QFF COMMENT
<b>PRIORITY AREA 1 – Shared biosecurity culture</b>	<b>We will enhance our culture of biosecurity action so everyone understands its importance and plays their part.</b> <ul style="list-style-type: none"> <li>• Build on and develop national education and awareness programs</li> <li>• Encourage positive biosecurity behaviours and incentivise compliance</li> <li>• Revitalise national communication and engagement mechanisms</li> </ul>	Education and awareness programs are critical given the decrease in general surveillance and the closure of regional laboratories in the past decade.

	<ul style="list-style-type: none"> <li>Determine opportunities to embed biosecurity considerations into decision-making and risk planning.</li> </ul>	
<p><b>PRIORITY AREA 2 – Highly skilled workforce</b></p>	<p><b>We will develop and sustain a highly skilled workforce to ensure we have the right capability in the right place at the right time</b></p> <ul style="list-style-type: none"> <li>Identify current and future skills needs in key areas</li> <li>Develop a workforce strategy to build, retain and deploy capability</li> <li>Build on and expand existing cooperative arrangements</li> <li>Strengthen professional development programs.</li> </ul>	<p>Support – there must be investment in skills as many of the skills are in an older workforce and will not be available in 5-10 years time. Already there are many gaps due to retirements.</p>
<p><b>PRIORITY AREA 3 – Sustainable investment</b></p>	<p><b>We will ensure funding and investment is sufficient, co-funded, transparent, and sustainable for the long term.</b></p> <ul style="list-style-type: none"> <li>Work together to identify funding needs and determine priorities</li> <li>Strengthen frameworks to agree and deliver priority investments</li> <li>Advance co-funding and investment strategies with stakeholders</li> <li>Increase the transparency of biosecurity funding</li> <li>Complete a system performance and evaluation framework</li> </ul>	<p>While hard to evaluate intangible outcomes on the community, a cost benefit calculation would give a decision framework for the amount of co-funding government, industry and the taxpayer should fund.</p>
<p><b>PRIORITY AREA 4 – Stronger partnerships</b></p>	<p><b>We will strengthen and expand partnerships and networks between all stakeholders at local, regional, national and international levels.</b></p> <ul style="list-style-type: none"> <li>Enhance partnerships and engagement with Indigenous Australians</li> <li>Collaboratively review and refine roles and responsibilities</li> <li>Review governance arrangements to ensure they include relevant stakeholders</li> <li>Identify opportunities for industry and community involvement in peak decision-making bodies</li> <li>Strengthen the involvement of environmental agencies</li> <li>Deepen international partnerships Work together to help shape global biosecurity standards, rules and conditions.</li> </ul>	<p>The dot point “Identify opportunities for industry and community involvement in peak decision-making bodies” is not strong enough. True partnerships are equal and the statement should read “Include industry and community as equal partners in decision making bodies”</p>
<p><b>PRIORITY AREA 5 Coordinated preparedness and response.</b></p>	<p><b>We will boost our system’s adaptability and its capacity to detect, prevent, manage, respond to and recover from outbreaks.</b></p> <ul style="list-style-type: none"> <li>Undertake and promote regular national preparedness exercises</li> <li>Advance regionally based planning activities</li> <li>Continually review and update risk information to inform priorities</li> <li>Actively embed continuous learning</li> </ul>	<p>This is the most critical priority to get right. Investment by government has declined in this area, particularly surveillance and investment will need to be substantially increased in the face of increasing threats. This priority could</p>

	<ul style="list-style-type: none"> <li>• Strengthen traceability arrangements</li> <li>• Enhance our national surveillance arrangements</li> <li>• Evolve our national information management frameworks.</li> </ul>	<p>be split into two or three priorities to give it the emphasis it needs, early detection, prevention and response. Each of these areas is fundamental to fighting threats.</p>
<p><b>PRIORITY AREA 6</b>  <b>Integration supported by technology, research and data.</b></p>	<p><b>We will create a more connected, efficient and science-based system to facilitate more timely, informed and risk-based decisions</b></p> <ul style="list-style-type: none"> <li>• Continue to invest in and rollout transformative technologies to digitise and automate processes</li> <li>• Increase stakeholder coordination to prioritise, drive and deliver national research outcomes</li> <li>• Actively share data and research widely</li> <li>• Enhance the accessibility and use of surveillance and interception data</li> <li>• Further support innovations to build science and research capacity.</li> </ul>	<p>Technology and science are essential to enhance our capability to respond. Access to data, is an issue if government does not provide an independent facility to collect this data. Relying on notifiable diseases and just testing for the suspected disease does not allow for the detection of emerging diseases. Without data, there will be insufficient intelligence and much reduced capacity to respond. Laboratories are critical and should be included in the actions.</p>

**Recommendation:**

QFF proposes that the 6 priorities be:

1. **Knowledge and intelligence of potential threats** through effective surveillance and assessment of emerging threats. This will give early detection of threats, one of the most important factors in minimising impact. A surveillance strategy needs to be developed to determine a critical level of surveillance across all states. Emerging threats, including the impact of climate change, need to be evaluated and forecast.
2. **Prevention of threats.** This covers a highly skilled workforce, and training and prevention measures from border to farm through awareness, training and on farm biosecurity measures.
3. **Response and recovery.** This would include keeping Ausvetplan updated in animal industries and Plantplan for plants. The success to an effective response is planning, actively learning from past responses (so often not well done) and regular training of people who will be involved in the response. While, industry personnel will be busy managing their own productions, there needs to be good knowledge of the industry by the response participants. This means that in times of no threats, that government and other personnel who will be involved need to be actively updating themselves on how industry works on the ground. There have been alarming declines in government officers with on ground knowledge of industries.
4. **Integration supported by technology, research and data.** As per the consultation draft, this is a high priority. Laboratories however need to be specifically mentioned as they are critical.
5. **Shared biosecurity culture and stronger partnerships.** These two priority areas could be combined with an emphasis on real partnerships with shared decision making.

## 2 ROLES WITHIN THE BIOSECURITY SYSTEM

Can you see your current role within the biosecurity system reflected in the consultation draft?

Do you think the 'How our biosecurity system works' diagram (page 15) reflects your role and responsibilities in the biosecurity system? If not, what amendments should be made?

How do you see your own and others' roles changing into the future?

### QFF Comment

The diagram on page 15 is largely correct for industry; however, the detail following on pages 16 and 17, is somewhat concerning as clarification needs to be had on responsibilities such as import risk analysis, offshore treatments, capability building in neighbours, diagnostics and surveillance to name a few of the 20 plus areas on the diagram. It is difficult to interpret its significance and would be helpful if at least one agency was given the primary responsibility role for that area e.g. diagnostics and surveillance. By allocating responsibility to all is a sure way for groups to expect that someone else is doing it. By allocating a lead agency, other groups know they have a supportive role which can be defined.

QFF sees industries' roles primarily in prevention with on farm biosecurity plans, awareness of producers of risks and compliance and in working in partnership with government/responders in emergency response from high level decision making to on the ground operational matters.

## 3. BIOSECURITY RISKS AND OPPORTUNITIES

Are there any key risks and opportunities not captured in the consultation draft?  
Do any of the biosecurity risks or opportunities outlined in the consultation draft have additional implications for our 6 priority areas.

### QFF Comment

Critical key risks for biosecurity include

1. The loss of skilled and knowledgeable personnel particularly in government but also in industry and
2. The significant decline in surveillance which means pests and diseases will get a significant hold before being detected.
3. The variation and underfunded investment for biosecurity in different jurisdictions
4. The lack of mention in the strategy of ensuring that the diagnostic laboratories are at cutting edge and adequately resourced.
5. The lack of emphasis on forecasting and analysing trends and threats in particular the impact of **climate change**. There is a theory that the jet streams and cyclonic weather blew a lot of mosquitoes into Australia from Indonesia in November 2021 resulting in JE infections in 2022. Equally in the 2006 outbreak of sugarcane smut and the comment was made: "Its very interesting because in about 2004 there were some quite unusual jet stream winds and our pathologist at the time commented that this is the sort of weather event that could bring smut from either Indonesia or the Ord across to the east coast"

**In the animal industries**, there are some key comparisons as to how capacity to detect, diagnose and respond to diseases have markedly declined in recent years.

- There was a high level of investment in the 1980's in Queensland where veterinary pathologists received overseas training and regional laboratories opened in strategic locations. This meant that Queensland was in a good position to respond to the disease challenges of the following 20 years (Hendra, equine influenza, avian influenza, new chicken diseases to name a few) with excellent surveillance and trained and knowledgeable staff who were also experienced in emergency response.
- Regional veterinary laboratories in Queensland have now closed, staff have been cut and training very much reduced. These staff are now retiring, surveillance has dropped to below 20% of what it was in the early 90's (there were 900 submissions of poultry diagnostics submitted in the early 90's, at the last poultry meeting in 2021 the total for previous 6 months was 69). We remain extremely vulnerable to a major outbreak which we will not be able to manage.
- Thirty years we had data but limited analysis. Now it is the reverse. We have investment in computer programs to analyse data but there is little to no data to analyse.
- The risk for animal industries is at a higher level than at any other time e.g. African Swine Fever and avian influenza. Additionally we have sudden emerging diseases that were not on the radar such as Japanese encephalitis. Investment in early detection, surveillance, and the diagnostic and response system are the most critical areas to put investment into.

**In the plant industries**, there are more species and pathogens than animals and less dedicated laboratories to receive samples for general surveillance. There is usually a longer time for the disease to be diagnosed and then it is difficult to eradicate. **Sugarcane smut**, caused by the fungus *Ustilago scitaminea* in Queensland in 2006 wiped up to 30 per cent off gross margins in the state's \$2 billion industry. It was found in multiple areas and tracing evidence suggested that the disease had been present for 2 years. One pathologist felt that abnormal jet streams from Indonesia in 2004 may have been responsible for blowing the fungus in from overseas. Control is now by planting resistant plants.

There is a lot at stake. Other plant diseases that have occurred in recent years include **Citrus Canker** in 2006 where approximately 490,000 citrus trees were destroyed, an area of around 3000 square kilometres. Also destroyed were 175,000 native citrus or citrus glauca which are hosts to citrus canker. The citrus canker outbreak had a huge impact on the community – it was the Chamber of Commerce view that every business in Emerald and surrounding areas had been affected. This outbreak was believed to be caused by illegal importation.

Described as the “Ebola virus” of bananas, **Panama tropical race 4 disease, a soil fungus** left producers in the \$600 million- a year industry scrambling to react to the potentially devastating outbreak at Tully in 2015. If the disease were to spread beyond its current distribution in Australia or new infections arrive, it could devastate Australia's banana industry. In 2020, another infection was found on a property close to three other properties infested with the disease in 2015. The Qld government has spent \$42 million to manage the disease.

The characteristic of plant diseases is that when it is detected, it is usually well established and possibly here to stay. Early detection is a priority in managing these diseases.

#### Recommendation:

1. Early detection requires robust diagnostic systems. A baseline audit of what the capacity of plant diagnostics is in Australia needs to be done as well as the number of plant submissions by species.
2. The issue of government disinvestment in biosecurity at state government levels needs to be addressed. If government has downsized its commitment, an alternative system to generate the same services is critical. Consideration should be given to establishing a separate independent entity to provide these services. These risks need to be acknowledged and solutions brought to the table in a national think tank.

#### 4. ACTIONS

What are your views on the proposed initial actions?  
What other actions should be included to deliver our 6 priority areas, address biosecurity risks and capitalise on our opportunities for change

#### QFF Comment

In the most critical priority, Coordinated preparedness and response, the actions are inadequate to address the risks faced in this sector. There needs to be:

- a commitment to a surveillance strategy which includes emerging diseases.
- a commitment to minimum training needs, exercises and future proofing our responses based on continuous improvement.
- These commitments need to have a base level assessment of their current effectiveness and then performance measured each year to tangible performance indicators. It is not ok to just say that that action has been fulfilled because we have had two national exercises this year. The question requires asking what outcomes have resulted and to what quantum have we improved in these areas to reduce risk.

A critical area is the issue of co-funding. While hard to evaluate intangible outcomes on the community, a cost benefit calculation would give a decision framework for the amount of co-funding that government, industry and the taxpayer should fund. Where there is substantial flow on benefit for the community if certain actions are taken, that amount needs to be factored into co-funding calculation.

#### 6. IMPLEMENTATION AND REVIEW

What mechanisms should be established to ensure stakeholders are involved in the further development of actions and implementation planning?  
– How regularly should the strategy be reviewed?  
– How should we monitor and evaluate the success of the national strategy and implementation plans

## QFF Comment

Actions and implementation plans should be developed with stakeholders and signed off by them. The strategy should be reviewed annually for its relevance and to see if there needs to be small or large changes required to fit the current situation. A full review every 5 years with stakeholders would be adequate.

Measuring performance is critical and performance indicators should be monitored annually and put into a report. As far as possible, these performance indicators need to be measurable and tangible.

**Thank you for the opportunity to contribute to this important strategy. Please also find attached a letter of support from Growcom one of our members.**

Yours sincerely

A handwritten signature in cursive script that reads 'Jo Sheppard'.

Jo Sheppard  
Chief Executive Officer