



QUEENSLAND  
FARMERS'  
FEDERATION



# National Policy on Pest Freedom Programs and Pest Absence **September 2025**

**Prepared by**  
Jo Sheppard, CEO, QFF  
E: [qfarmers@qff.org.au](mailto:qfarmers@qff.org.au)

**Prepared for**  
The Department of Agriculture,  
Fisheries and Forestry

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This submission is provided to:

Department of Agriculture, Fisheries and Forestry

Submitted via: <https://haveyoursay.agriculture.gov.au/pest-freedom-absence-policy>

### 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 Policy on Pest Freedom Programs and Pest Absence.

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

## Overview

Thank you for the opportunity to comment on this important policy underpinning export trade of plants from all of or parts of Australia declared pest free. This is an important document. With no written set of national requirements that guide the implementation of a pest free area. Queensland Farmers' Federation welcomes this development where industry can be consulted and give feedback.

- Queensland Farmers' Federation (QFF) understands that the policy is supported by two documents "*National Guidelines for Implementing Pest Freedom Programs and Areas of Pest Absence*" and "*Template for Implementing Pest Freedom Programs and Areas of Pest Absence*" but that these documents are mostly for government use and not open for consultation.
- QFF supports a document that is open for industry to have input and feedback on. This lays out a broad framework for jurisdictions to follow with regard to pest freedom determinations but for confidence in the procedures and information related to pest free status, the following points need to be adopted.
- **Confidence and credibility** in our biosecurity decisions requires systems and policies based on science and backed by consultation with agriculture and other affected stakeholders. This will ensure that any assumptions made are valid. Co designing policies will increase transparency and trust which are critical values in delivering effective biosecurity and trade partnerships.
- **Readability and Understanding: Terminology:** While it is important for terminology, definitions and frameworks to align with International Standards for Phytosanitary Measures, the plethora of acronyms (e.g. PF, PFPP, PFPS, APA, AFC, IPPC 2012d,

NPPO, ISPMs, ALOP etc) make the document quite confusing to read. QFF recommends that the acronyms are spelt out in full in the policy every time they are used. One or two acronyms are manageable to read in a policy but using it all the time affects readability and understanding.

- **Risk assessments and surveillance statistics** are at the core of decisions being made about whether an area is pest free and can trade. It is agreed that a risk assessment is needed to demonstrate that the risk of pest introduction is minimal and surveillance needed to justify the risk assessment. However, the risk assessment criteria appear subjective and consistency of methodology is unclear. There are a number of references quoted from the Food and Agricultural Organisation – will this policy be adhering to these and are they sufficient to ensure confidence in the final decisions.
- **Many risk assessments are made** on assumptions without checking back with industry on those assumptions. QFF recommends that industry be an active contributor to risk assessments and this be written into the policy.
- **Communications:** While specifics may not reside in this high-level policy, QFF would like to emphasize the following:
  - **Decisions on Pest Freedom and Pest Absence** should be clearly explained especially where there are variations for different areas. While there is the need to be flexible to accommodate different risk factors and conditions, it is important that the reasons why these areas have been designated
  - It is important that there is confidence that communication between technicians and policy makers within the biosecurity space is **effective and timely**.
  - There needs to be **simple messaging** that can be shared with affected industries to ensure transparency in the system is maintained.
- **Diagnostics** are an essential element of determining the absence or presence of a pest. There are acknowledged inconsistencies between individual Australian laboratories. QFF strongly recommends national standards and protocols with NATA accreditation applied and used.
  - The statement that diagnostic protocols “should” be agreed by jurisdictions needs the word “should” to be replaced by “must.” There are also variations in how suspect pests are identified whether by remote photos from the community or farmers or molecular tests.
  - Diagnostics may need their own standalone policy on how statistics can be applied from a varying degree of input data.

## Summary

QFF supports this document and welcomes the opportunity to have input.

Yours sincerely

Jo Sheppard  
Chief Executive Officer



**This submission is provided by the Queensland Farmers' Federation**

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

**Contact QFF**

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**E:** [qfarmers@qff.org.au](mailto:qfarmers@qff.org.au)  
**P:** 07 3837 4720  
**W:** [www.qff.org.au](http://www.qff.org.au)

