



# NATIONAL BIOSECURITY STRATEGY

Draft Action Plan

August 2024

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National Biosecurity Strategy Implementation Committee and National Biosecurity Strategy  
Integration team  
Department of Agriculture, Fisheries and Forestry

By email: [nationalbiosecuritystrategy@aff.gov.au](mailto:nationalbiosecuritystrategy@aff.gov.au)

Dear NBS Implementation and Integration teams

**RE: Consultation on a draft National Gene Drive Policy Guide**

Australia's billion-dollar seed industry is the very starting point of vast sectors of Australian agriculture. From direct horticulture and grains production, through to the pasture and feedstock that feeds our livestock industry – seed is an agricultural foundation. The seed industry also supports home gardeners, local councils and sporting organisations as well as environmental repair and rehabilitation through native seed.

Due the nature of seed production, our members are heavily involved in both the import and export of seed which means seed industry's touchpoints with Australia's biosecurity system are multiple and complex and biosecurity has been a major concern of Australian Seed Federation members for many years.

Our membership covers the full seed supply chain and includes plant breeders, seed growers, seed processors and seed marketers.

The seed industry is a great advocate for a strong and sustainable biosecurity system in Australia.

We welcome the opportunity to respond to the areas of the National Biosecurity Strategy Action Plan that concern the members of ASF.

Yours sincerely



Katherine Delbridge  
**Chief Executive Officer**

### **NBS priority area 3: Highly skilled workforce**

***We will develop and sustain a highly skilled workforce to ensure we have the right capability and capacity, in the right place, at the right time.***

*The highly skilled workforce priority will develop and sustain the pipeline of biosecurity skills needed for the future, within government, industry, and the community. The aim is to provide targeted capability and capacity building, education, and training to ensure people can be deployed when and where they are needed, and that they have the right skills.*

The Australian Seed Federation sees priority area 3 as the most critical. Without this highly skilled workforce, the other priority areas will not be addressed.

From the point of view of the Australian seed industry, clearance times of seed imports have fluctuated over the past five years. After an improvement in 2019, COVID caused significant delays. Resulting recruitment issues due to a widely acknowledged workforce shortage has been one reason timeframe trends have not returned to an upward trajectory.

While we understand that biosecurity officers have had other priorities including Varroa mite and foot-and-mouth disease prevention to contend with, the continued border clearance delays the seed industry continues to encounter are unsustainable.

Border clearance or seed import inspection delays impact the entire seed supply chain, including leading to increased transportation and freight costs. These cost and time impacts flow on to growers who work under strict seeding timeframes. Seed should be treated as a perishable commodity as delays can affect germination and seed quality.

The seed industry is at a disadvantage due to a lack of biosecurity officers trained in seed assessments.

There are reports of there being as few as one or two biosecurity officers working to assess seed imports in Brisbane. This lack of resourcing can result in weeks-long delays.

Seed inspection is a specialised skill, and the seed industry is brimming with expertise and willingness to be an active partner in seed education to assist the department to train up more biosecurity officers for seed inspections.

The Australian Seed Federation has recently completed a project with teams within the Department of Agriculture, Fisheries and Forestry to address a disadvantage that the seed industry faces due to a lack of biosecurity officers trained in seed assessments. This is a very welcome development and members of the Australian Seed Federation have willingly engaged in the project to date, sharing their expertise, facilities and products for training purposes.

These sorts of government / industry partnerships must be prioritised to ensure a highly skilled workforce.

But a highly skilled workforce must be enabled to work within a flexible, efficient working environment.

Members of the Australian Seed Federation have repeatedly expressed their frustrations at the portal system which rather than improve timeliness of biosecurity inspections, has led to further delays, frustrations, and inefficiencies. There are reports of biosecurity officers waiting in cars for hours for the portal to clear them to do a job which could have been completed in 15 minutes.

Process for process-sake has huge consequences for businesses. Each efficiency builds to cause significant delays, industry pays for these inefficiencies.

## **NBS priority area 2: Stronger partnerships**

***We will strengthen and expand partnerships and networks between all stakeholders at local, regional, national, and international levels.***

*The stronger partnerships priority aims to strengthen and expand partnerships and networks between all stakeholders at local, regional, national, and international levels. This will leverage different perspectives, expertise, resources, and knowledge for greater impact to support better biosecurity outcomes.*

*Mutual trust, formal recognition, transparency, and a clear understanding of the importance of everyone's role underpins these partnerships, creating the shared responsibility for achieving strong biosecurity outcomes for Australia.*

A piece that could be directly built into IA2.8 *Coordinate our international advocacy efforts to help shape global standards, rules and conditions* is the international Systems Approach for Seeds, something of which the Department of Agriculture, Fisheries and Forestry is already well aware of.

There is a growing complexity of global seed trade. Seed trade is growing rapidly. At the same time many countries are defining new, not harmonised and more specific phytosanitary requirements for seeds. The increase in trade as well as in phytosanitary requirements results in a high degree of complexity to move seed around the globe. There is a need for simplification and harmonisation of the current system to ship seed internationally.

The purpose of a Systems Approach for Seeds is not to solve specific high phytosanitary risks. Field inspections, 'country free from...' declarations, seed treatments or seed health testing are frequently used, as individual and effective phytosanitary measures. Systems approach for seeds is seen as a possibility to provide standardised guidance for a harmonised alternative to consignment-by-consignment testing and inspection of seeds at export by multilaterally recognising existing industry measures. It will lead to the development of a more efficient and predictable alternative to ship seeds internationally.

Elements in such a SA that can simplify and harmonise are

- Harmonisation of pest lists. Focus on those pests where seed has been identified to be a pathway for introduction and spread of the pest under natural field conditions.
- Grouping of pests. Measures in the systems approach could be based not on individual pests but on the pathways of introduction and spread of pests into a seed production site. Although there may be thousands of pests, there are relatively few pathways of introduction. Mitigation measures for a particular target pest also effectively protect against similar pests in each pathway category. Effective mitigation of these pathways will provide protection against many pests with similar biology and epidemiology at a time. This will avoid the necessity to have specific measures in place for each individual pest.

- Use of industry phytosanitary best practices as a basis. Seed companies already have many procedures in place to prevent infection/ infestation of seeds with seed transmitted pests. Implementation of the Systems Approach can leverage these current industry practices.
- A multilateral systems approach. While we recognise that bilateral agreements are the current way of working in International Plant Protection Convention, with multilateral acceptance, pest risk management options applied in the country of export are recognised by National Plant Protection Organisations (NPPO) of multiple importing countries. A Systems Approach for Seeds can be built up gradually and evolve from only a few participating countries in the beginning to global acceptance in time. Countries are free to recognise the systems approach for seed and join.
- Simplification of the phytosanitary certificate: the SA is a system in which seeds produced in a NPPO-approved supply chain can be imported and (re-)exported with a phytosanitary certificate, without the specification of individual pests.

### **NBS priority area 5: Sustainable investment**

***We will ensure funding and investment is sufficient, co-funded, transparent, targeted to our priorities and sustainable for the long term.***

*The sustainable investment priority aims to develop long-term sustainable biosecurity funding and investment approaches (including new funding streams and models) that recognise the value of government, industry and the community investing in biosecurity to support the system's growing needs and priorities.*

*This priority area is recognised by stakeholders as important and underpinning of other priority areas. The challenge of sustainable funding and investment is not unique to biosecurity and there are calls for a national conversation. The NBS notes that we will ensure sustainable investment approaches are efficient, equitable, adaptable, transparent, and responsive to the changing risk environment.*

The Australian seed industry supports the aspiration of implementing a long-term sustainable biosecurity funding model. A sustainable funding model is, however, moot should Australia's biosecurity system not improve its effectiveness and efficiency so that the agriculture industry, and all other contributors to the biosecurity system, can realise return on investment.

Careful consideration needs to be given to at what point increased biosecurity costs on seed companies lead to companies choosing instead to limit their business operations or preference other markets over Australia rather than pay increased fees and levies.

The proposed Biosecurity Protection Levy had extremely limited industry engagement (if any) prior to the 2023-24 biosecurity components of the budget announcement. This was clearly an unsuccessful proposal which did not enjoy any industry support.

The Sustainable Biosecurity Funding Advisory Panel must be well consulted before any major changes to funding arrangements are developed.

## **NBS Priority area 6: Integration supported by technology, research and data**

***We will create a more connected, efficient, and science-based system to facilitate timely, informed and risk-based decisions.***

*The integration supported by technology, research and data priority aims to create a more connected and efficient system to better leverage existing and new technology, research, and data to facilitate timely, informed and risk-based decisions.*

*Stakeholders identified the need for nationally coordinated approaches with an emphasis on improving surveillance systems, data sharing and sought improvements in decision-making and resource allocation.*

Specific to IA6.5 Further support innovations to build science and research capacity and IA6.8 Encourage greater private sector investment in the development and delivery of biosecurity innovations is the ARC Training Centre in Plant Biosecurity.

The Centre has been established to transform Australian plant biosecurity and protect Australia's multi-billion dollar industries and natural ecosystems by facilitating generational change in people, technology, innovation, adoption, and policy.

The Centre's mission is to transform the Australian plant biosecurity sector by training the next leaders and innovators in the latest technological and societal approaches for protection of our multi-billion dollar natural and productive ecosystems.

The Centre is current seeking PhD applicants to innovate novel approaches to prevent, respond to, and recover from plant pests and diseases that threaten the economy and environment. They have 10 projects now open for expressions of interest from prospective students, and more to come.

The Centre is backed by partners: Australian Government Department of Agriculture, Fisheries and Forestry; Australian Centre for International Agricultural Research (ACIAR); CSIRO; Queensland Department of Agriculture and Fisheries; South Australian Research and Development Institute (SARDI); Northern Territory Government Department of Industry, Tourism and Trade; Agriculture Victoria; NSW Department of Primary Industries and Regional Development; Plant Health Australia; Plant Biosecurity Research Initiative; Sugar Research Australia; Forest and Wood Products Australia; Hort Innovation Australia; Wine Australia; Australian Wine Research Institute; Herbert Cane Productivity Services Limited; Burdekin Productivity Services Limited; Australian Seed Federation; Australian Banana Growers Council Inc; Bioplatforms Australia Ltd; Diversity Arrays Technology Pty Ltd; InFarm Pty Ltd; Data Effects Pty Ltd; Timor Leste Quarantine Biosecurity Unity; University of Sao Paulo; New Zealand Institute for Plant and Food Research; Better Border Biosecurity (B3); The Centre should be an active participant in Priority Area 6.