



A STRONGER SEED INDUSTRY FOR A STRONGER AUSTRALIA

2025-26 Pre-Budget submission

January 2025

31 January 2025

The Hon Stephen Jones MP
Assistant Treasurer and Minister for Financial Services
Treasury
Langton Cres
Parkes ACT 2600

By email: prebudgetsubmissions@treasury.gov.au

Dear Assistant Treasurer

RE: 2025–26 Pre-Budget submission

On behalf of the Australian Seed Federation, I provide the attached submission in response to your call for views regarding priorities for the 2025–26 Budget.

The Australian Seed Federation is the peak industry body for the Australian seed industry at the local, state, national and international level. The members of the Australian Seed Federation are at the foundation of Australia's \$86 billion agriculture industry. Our membership covers the full seed supply chain and includes plant breeders, seed growers, seed processors and seed marketers. We exist to ensure a seed industry that is productive and sustainable.

The Australian Seed Industry is worth over \$1 billion annually to the Australian economy and is an important part of rural and regional Australia.

We provide this submission in the interest of developing a nationally and internationally consistent approach towards growth in productivity of Australian and international agriculture, through the delivery and supply of new and improved seed commodities and services to the market.

The seed industry has always responded to the need for increased crop yields, nutritious and environmentally responsive varieties, and options to combat crop pests and diseases.

This submission identifies those areas where additional investment by government or policy decisions are required to ensure Australia's seed industry is resilient to change, can rapidly respond to emerging agricultural issues and facilitate the ability of Australian farmers to compete in global markets.

Yours sincerely



Katherine Delbridge
Chief Executive Officer

A Stronger Seed Industry for a Stronger Australia

The Australian Seed Federation (ASF) calls on the Australian Government to back the seed industry as a driver of innovation, productivity, and sustainability. With the agriculture sector targeting \$100 billion in farmgate value by 2030, and many other industries reliant on seed and seed products, a strong, competitive seed industry is critical.

We urge the Government to act on the following priorities:

Protect plant breeding and innovation

- **Enforce Plant Breeders' Rights (PBR)** – Fund IP Australia to expedite the PBR review and introduce an Information Notice System to crack down on non-compliance and ensure Australia continues to be a home of plant breeding innovation.
- **Ensure fair End Point Royalty (EPR) collection** – Strengthen systems to support growers to pay royalties, protecting breeding investment and innovation.

Fix biosecurity and border delays

- **Faster clearance times** – Cap seed import delays at three days by funding better-trained biosecurity officers and streamlined processes.
- **End inefficiencies** – Eliminate outdated systems that cause unnecessary costs and delays for Australian agribusiness.

Modernise phytosanitary regulations

- **Support Australia's testing system** – Align phytosanitary testing with global standards to avoid trade barriers.
- **Support a 'Systems Approach for seed'** – Fund DAFF to participate in a pilot certification-based system that facilitates seed trade without excessive red tape.

Boost industry standards and awareness

- **Support 'Know Before You Sow' & the Seed Industry Code of Practice** – Fund national education programs to reduce illegal seed practices and contamination risks.

Enable gene technology and new breeding techniques

- **Implement long-overdue reforms** – Fast-track regulatory updates from the Third Review of the National Gene Technology Scheme and FSANZ's review of food from New Breeding Techniques.

Solve workforce shortages

- **Fund an Agricultural Workforce Campaign** – Attract and retain skilled workers in the seed industry, ensuring Australia's agricultural future.

Invest in sustainability and carbon trials

- **Support carbon sequestration trials for turfgrass** – Unlock turf's potential as a major carbon sink with targeted research funding.

Establish a National Native Seed Framework

- **Set clear, consistent standards** – Develop a nationally consistent framework for native seed collection, and quality assurance.
- **Support supply chain development** – Invest in native seed production to meet growing demand for restoration, carbon projects, and biodiversity initiatives.

Strengthen Australia's pasture seed industry with reliable data

- **Close the information gap** – Establish a national system to track pasture seed production, ensuring accurate industry data.
- **Support smarter decision-making** – Give industry and government the insights needed to plan for growth, investment, and global competitiveness.

Protect plant breeding and innovation

There are ongoing and growing issues relating to the security of Plant Breeder's Rights and the R&D and breeding industry's ability to secure their income through End Point Royalties (EPR) payments.

Declines in compliance with EPR payments, due to uncertainties related to PBR enforcement, is leading to reduced income and is having impacts on plant breeding businesses and their viability. Reduced investment in the plant breeding industry will have consequences for the future productivity of the Australian agriculture.

We are calling for the current review of Plant Breeder's Rights that is currently being undertaken by IP Australia to be funded appropriately so as to be expedited. The current lack of progress and clear timeframes around this review has raised concerns amongst members of Australia's broadacre crop breeding industry, as well as the broader grains industry and pasture and grass seed companies.

In the absence of a clearer legal basis for plant breeding companies to underpin compliance, companies will need to make the commercial decision to reduce their investment in breeding activities in regions of low compliance and redirect resources to states and regions where they are more assured of a financial return. This will reduce the productivity of Australian agriculture, at a time when productivity in the industry is coming under increasing pressures from biosecurity pressures as well as the impacts of climate change on seasonal productivity.

With the current review of the Plant Breeder Rights (PBR) Act being undertaken through IP Australia there is an opportunity to address this issue. There are a number of key areas within the Plant Breeder Rights Act that require clarification and or amendment to address issues related to intellectual property ownership. ASF has supplied these to IP Australia and therefore won't provide them in detail as part of this submission. They are as follows:

1. Clarify the definition of Propagating material to include Harvested Material from field crops
2. Harmonise with UPOV and their current definition of Essentially Derived
3. Include a Purchase right to section 11 of the Act
4. Introduce a Notice system to support compliance

All of these improvements, in a timely manner, would ensure Australian plant breeding remains strong and focussed on innovation.

The ASF **recommends** the Australian Government fund IP Australia to:

Enforce Plant Breeders' Rights (PBR) – IP Australia must expedite the PBR review and introduce an Information Notice System to crack down on non-compliance and ensure Australia continues to be a home of plant breeding innovation.

Ensure fair End Point Royalty (EPR) collection – Strengthen systems to support growers to pay royalties, protecting breeding investment and innovation.

Fix biosecurity and border delays

Seed import clearance times, compounded by workforce shortages, are unsustainable.

These delays impact the entire supply chain, increasing freight costs and disrupting growers' strict seeding timelines. Seed should be treated as a perishable commodity due to its sensitivity to storage time and conditions.

A major issue is the shortage of trained biosecurity officers for seed assessments which in some cases cause weeks-long delays. The Australian Seed Federation is working with the Department of Agriculture, Fisheries and Forestry to address this gap by supporting training initiatives, but further funding is needed to expand the program.

It is also critical that charge rates for biosecurity inspections reflect officer expertise, as less experienced officers take longer. Previously, companies could book inspections at a cost-effective day rate, but this option is no longer available.

Re-introducing a primary production levy is not the answer. The seed industry already significantly contributes to biosecurity measures and should not be burdened with additional levies.

The ASF **recommends** the Australian Government provide DAFF with funding to:

Ensure faster clearance times – Cap seed import delays at three days by funding better-trained biosecurity officers and streamlined processes.

End inefficiencies – Eliminate outdated systems that cause unnecessary costs and delays for Australian agribusiness.

Modernise phytosanitary regulations

The Department of Agriculture, Fisheries and Forestry has introduced mandatory destructive phytosanitary testing protocols not used elsewhere, causing delays and discouraging the import of high-potential germplasm for breeding. This limits Australia's competitiveness as an agricultural exporter and creates inefficiencies for departmental staff.

Additional funding is needed to complete long-overdue Pest Risk Analyses with proper industry consultation to provide certainty for seed importers.

Seed movement is essential for global food production, breeding, and trade. However, Australia's consignment-by-consignment phytosanitary certification process is becoming increasingly restrictive, making re-export difficult due to highly specific import requirements.

The Australian Seed Federation supports implementing a Systems Approach for seed—a certified supply chain model based on industry pest management practices—to facilitate import and export. Initial discussions with the Department have been positive.

The ASF urges the Australian Government to actively support the International Plant Protection Convention (IPPC) in developing a Systems Approach Annex to ISPM 38 and provide financial backing for these efforts.

The ASF **recommends** the Australian Government fund DAFF to:

Support Australia's testing system – Align phytosanitary testing with global standards to avoid trade barriers.

Support a 'Systems Approach for seed' – Fund DAFF to participate in a pilot certification-based system that facilitates seed trade without excessive red tape.

Boost industry standards and awareness

Seed is the most critical input for any crop or pasture. Assessing its quality ensures buyers receive value for money and avoid introducing weeds.

The *Know Before you Sow checklist* helps buyers mitigate risks by guiding their conversations with suppliers. Further education through the *Know Before You Sow* campaign will reduce biosecurity risks and discourage unregulated "over-the-fence" trading, which can introduce pests and weeds.

Promoting *Know Before You Sow* and the ASF Codes of Practice—which all members follow and are audited against—will ensure industry participants have consistent, accurate information to make informed seed purchasing and handling decisions.

The ASF **recommends** the Australian Government fund DAFF to:

Support 'Know Before You Sow' & the Seed Industry Code of Practice – Fund national education programs to reduce illegal seed practices and contamination risks.

Enable gene technology and new breeding techniques

In 2018, the Gene Technology Ministers' Meeting (GTMM) endorsed the Third Review of the National Gene Technology Scheme, aiming to modernise regulation across agriculture, health, and medicine. Despite multiple consultation rounds and industry's consistent calls for updated definitions, risk-proportionate regulation, and streamlined requirements, progress has been slow.

In September 2024, the Department of Health released the Exposure Draft of the Gene Technology Amendment Bill 2024 for public consultation, which closed on 8 November 2024. However, the legislation has yet to be introduced into the Commonwealth Parliament. The Australian Government must fund the Department of Health to prioritise implementation before the next review cycle begins.

To prevent regulatory misalignment, FSANZ has progressed Proposal P1055 to amend definitions in the Food Standards Code for GM foods and gene technology. Following initial consultation in 2021, a revised definition was proposed, and a second public consultation closed on 10 September 2024. While this is a step forward, timely finalisation and implementation are essential to provide clarity and certainty for industry.

The ASF **recommends** the Australian Government fund Health / OGTR / FSANZ to:

Implement long-overdue reforms – Fast-track regulatory updates from the Third Review of the National Gene Technology Scheme and FSANZ's review of food from New Breeding Techniques.

Solve workforce shortages

The Australian seed industry, valued at over \$1 billion, is essential to food, feedstock, and textile fibre production. However, like many agricultural sectors, it faces critical workforce shortages.

To address this, the Australian Seed Federation has invested in the Seed Industry Professional Program, providing education and training for new and existing professionals. Government initiatives

such as AgCAREERSTART, which supports young Australians entering agriculture, and the AgConnections – Skilled Agricultural Work Liaison pilot, which funds universities to engage students in agricultural careers, are positive steps. Additionally, the AgUP grants program supports industry-led projects focused on workforce attraction, training, and career development.

The Agricultural Workforce Forum should be reinvigorated in order to secure a future workforce.

The ASF **recommends** the Australian Government fund DAFF to:

Fund an Agricultural Workforce Campaign – Attract and retain skilled workers in the seed industry, ensuring Australia’s agricultural future.

Invest in sustainability and carbon trials

Turf is a significant carbon sequester, with the potential to be one of Australia’s largest carbon-storing crops given the vast areas of golf courses, playing fields, parks, schools, and home gardens covered in turf.

The turf seed members of the Australian Seed Federation seek investment for field trials to quantify the carbon sequestration potential of turf grasses suited to Australian conditions. These trials will evaluate trade-offs between maintenance intensity, soil carbon storage, and overall turf performance.

Since 1997, the Australian National Turfgrass Evaluation Program (ANTEP) has provided independent varietal testing, addressing the previous reliance on U.S. data. While ANTEP has successfully trialed perennial ryegrass, tall fescue, and Bermuda couch, future trials aim to assess turf’s role as an environmental tool beyond its traditional attributes.

A modest financial investment in an ANTEP trial focused on carbon sequestration could yield substantial environmental and economic benefits, especially given research indicating turf sequesters 80–90% of carbon in home environments. These findings would provide valuable data for turf managers, supporting sustainable decision-making in turf selection and management.

The ASF **recommends** the Australian Government fund ANTEP trials:

Support carbon sequestration trials for turfgrass – Unlock turf’s potential as a major carbon sink with targeted research funding.

Establish a National Native Seed Framework

Native seed plays a critical role in ecological restoration, carbon sequestration, and biodiversity conservation. However, the industry faces challenges due to inconsistent standards, variable seed quality, and supply shortages that limit its ability to meet increasing demand.

A National Native Seed Framework is needed to:

- Set clear, consistent standards – Establish a nationally consistent approach for native seed collection, handling, and quality assurance to improve reliability and effectiveness in restoration projects.
- Support supply chain development – Invest in native seed production to build capacity, ensuring a stable supply for large-scale environmental restoration, carbon initiatives, and biodiversity projects.

A well-structured framework will provide greater certainty for land managers, environmental groups, and industry, supporting long-term ecological and commercial sustainability.

The ASF **recommends** the Australian Government fund the Australian Seed Federation to:

Set clear, consistent standards – Develop a nationally consistent framework for native seed collection, and quality assurance.

Support supply chain development – Invest in native seed production to meet growing demand for restoration, carbon projects, and biodiversity initiatives.

Strengthen Australia's pasture seed industry with reliable data

Australia's pasture seed industry lacks accurate data on domestic seed production, putting it far behind other agricultural sectors in understanding market size and trends. This data gap hinders industry and government decision-making, limiting opportunities for investment, growth, and strategic planning.

Historically, seed certification agencies provided reliable production data. However, with the shift toward proprietary seed varieties and reduced certification rates, much of the industry now operates without a clear system for tracking production volumes. Without a national reporting mechanism, the full economic and agricultural value of the industry remains unclear.

To address this, a national system to track pasture seed production is needed. A practical approach would be voluntary reporting by seed processing facilities, which handle nearly all pasture seed before sale. This model was successfully used in Victoria in the 1980s and, with industry support, could be implemented nationally.

Key benefits:

- Close the information gap – Provide accurate data on industry size and production value.
- Support smarter decision-making – Equip industry and government with insights for strategic planning, investment, and global competitiveness.
- Encourage industry growth – Reliable data would attract investment, foster collaboration, and drive innovation in Australia's pasture seed sector.

This initiative has strong industry support, with major seed processing facilities and company leaders backing the proposal. Initial establishment costs would decline over time as the system becomes integrated into industry practices. The Australian Seed Federation or Australian Seeds Authority would be the logical custodians for data collection and reporting.

A modest investment in establishing this system would deliver long-term benefits, strengthening Australia's pasture seed industry and ensuring it remains competitive in domestic and international markets.

The ASF **recommends** the Australian Government fund Agrifutures to:

Close the information gap – Establish a national system to track pasture seed production, ensuring accurate industry data.

Support smarter decision-making – Give industry and government the insights needed to plan for growth, investment, and global competitiveness