

# Proposed changes to regulatory charging for biosecurity activities - consultation paper

Department of Agriculture, Fisheries and Forestry



## 1. INTRODUCTION

CropLife Australia is the national peak industry organisation representing the agricultural chemical and plant biotechnology (plant science) sector in Australia. CropLife represents the innovators, developers, manufacturers and formulators of crop protection (organic, synthetic and biologically based) products and crop biotechnology innovations. CropLife's membership is made up of both large and small, patent holding and generic, and Australian and international companies and accordingly,


CropLife only advocates for policy positions that deliver whole of industry benefit. The plant science industry provides products to protect both crops and Australia's precious natural environment against damaging insects, invasive weeds and diseases that pose a serious threat to the nation's agricultural productivity, sustainability, food security and our beautiful national parks, nature reserves and delicate biodiversity.

The plant science industry is delivers more than \$20 billion in agricultural production annually to the Australian economy and employs thousands of people across the country<sup>1</sup>.

CropLife welcomes the opportunity to provide comments to the consultation, *Biosecurity cost recovery – proposed changes to regulatory charging*. It is essential to ensure a viable, fair and sustainable funding model to deliver outcomes that protect the environment and the community from biosecurity incursions and risks.

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<sup>1</sup> [https://www.croplife.org.au/wp-content/uploads/2018/04/Deloitte-Access-Economics-Economic-Activity-Attributable-to-Crop-Protection-Products\\_web.pdf](https://www.croplife.org.au/wp-content/uploads/2018/04/Deloitte-Access-Economics-Economic-Activity-Attributable-to-Crop-Protection-Products_web.pdf)



## 2. ADDRESSING FUNDING AND EFFICIENCY SHORTFALLS

Overall, CropLife recognises the need for an updated Cost Recovery Model. CropLife maintains, however, that the direct benefits of effective biosecurity are not limited to the users of the Biosecurity System; there does exist a broader public benefit. The costs of mitigation of established invasive insects, weeds and diseases (and therefore the benefits) are borne not only by farmers, but by federal, state and territory governments, local councils and individual citizens.

CropLife further recognises that a myriad of factors has resulted in ongoing, changing patterns of global trade, travel and land use. Australia sees increased volume and complexity of imports, which may require assessment, and that a changing climate creates suitable environments for insect pests, weeds and diseases to establish. The changing biosecurity risk profiles of near neighbours and trading partners have placed additional pressure on the biosecurity system and strained the ability to respond with speed and scale to emerging threats.

Between 2012 and 2017, the annual number of interceptions of biosecurity risk materials at Australian borders rose by almost 50 per cent, to 37,014<sup>2</sup>. These numbers continue to increase. For example, over three million sea containers arrive in Australia each year, yet only about eight per cent of these actually undergo biosecurity inspections.

Given the increased costs identified in the Consultation Paper of increased volumes, global emergence of novel pests, the changing distribution of pests and diseases in nearby countries and inflation on wages, suppliers, systems, property and utility costs, increased fees for use are considered to be appropriate. CropLife further recognised that fees have not increased substantially since the previous review was completed in 2016. The proposal to index appropriate cost elements annually, based on an agreed growth index from the Australian Bureau of Statistics or the Reserve Bank is also nominally appropriate to ensure funding remains commensurate to the above noted increase.

However, and importantly, if a nominal funding growth index is adopted there becomes an equally important efficiency improvement obligation on the Department and relevant agencies in undertaking their duties and operations.

CropLife specified during the previous consultation, there remains inefficiency and uncertainty in the Biosecurity Import Conditions (BICON) system. Substantial backlogs at BICON Permit processing have been variously problematic over the preceding years. The Plant and Animal Imports biosecurity divisions have variously issued notices and posted disclaimers on the BICON website regarding delays in import permit processing and approvals. This involved significant

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<sup>2</sup> [https://www.igb.gov.au/sites/default/files/documents/qid52820\\_igb\\_interceptions\\_and\\_incursions\\_report\\_-\\_final\\_1.pdf](https://www.igb.gov.au/sites/default/files/documents/qid52820_igb_interceptions_and_incursions_report_-_final_1.pdf)

delays and unpredictability associated with obtaining the requisite import permits for both critical components of and formulated crop protection products. These are the very products tasked with the eradication and management of invasive biosecurity incursions.

Despite the publication of new import cases to introduce standard permits for conditionally non-prohibited goods and products<sup>3,4</sup>, these backlogs continue to threaten the timely arrival of goods deemed low or no risk by the Director of Biosecurity. Further, there are non-standard permits required for many pesticides of biological origin for which importers have been advised assessment can take a minimum of 12 weeks to accomplish. While this may be variously appropriate for new or novel compounds, products that have undergone assessment by the APVMA and bear an APVMA approval number should require no further permitting.

Genuine commitment to and investment in completion of an updated Goods Determination for these lists of conditionally non-prohibited products will reallocate resources from unnecessary administration of products of low-risk and allow for greater scrutiny of known and identified appropriate risk material.

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<sup>3</sup> [Approved ingredients – Environmental End Use Biological Cleaning Agents, Odour Neutralisers or Sanitisation Products \(agriculture.gov.au\)](https://www.agriculture.gov.au/biosecurity-trade/import/online-services/bicon/bicon-permit/standard-permit)

<sup>4</sup> <https://www.agriculture.gov.au/biosecurity-trade/import/online-services/bicon/bicon-permit/standard-permit>

### 3. CONCLUSION

CropLife is pleased that the Commonwealth is committed to sustainable funding and investment to strengthen biosecurity. As indicated, the proposed fee increases are reasonable, especially given the previously acknowledged factors, which are increasing costs and changing conditions. However, the Department and relevant agencies have an obligation to significantly improve efficiencies in the operations at the same time. CropLife will continue to work collaboratively with government to assist in achieving the implementation of a stable, efficient, and effective system that will safeguard Australia's biosecurity future. It is important to note that pesticides, whether they be organic, synthetic or biologically based, play a crucial role in Australia's biosecurity measures and response preparedness and will only become even more significant and important in coming years as further threats evolve. All relevant government agencies, industries and stakeholders will need to work collaboratively and efficiently driven by scientifically based policy and initiatives supported by efficient regulatory systems to safeguard Australia's biosecurity future. The plant science sector will continue to foster and enable environmental conservation and the protection of Australia's rich natural biodiversity through product innovation and development. The products and innovations of the plant science industry continue to foster and enable Australia's goal of producing \$100 billion in farm gate output by 2030, as well as supporting environmental conservation and the protection of Australia's rich natural biodiversity.

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