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Biosecurity Strategy and Reform Division
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National Biosecurity Reform,

Australian Dairy Farmers (ADF) is providing the following feedback on the National Biosecurity Reform Agenda.

Australia's dairy farmers support a strong national biosecurity system. Effective biosecurity underpins food security, trade access, public health, environmental protection and regional economies. It protects assets and interests that extend well beyond agriculture and delivers benefits to all Australians.

ADF's primary concern with the current reform process is the apparent focus on identifying new funding arrangements and cost-sharing mechanisms that risk increasing the financial burden on agricultural producers.

ADF is equally concerned that this reform agenda is proceeding despite many recommendations from previous reviews, inquiries and reform programs remaining incomplete, partially implemented or yet to demonstrate measurable outcomes.

Australia's Biosecurity System Requires National Investment

Biosecurity is a national asset and a shared national responsibility. It safeguards Australia's food supply, export markets, environment, public health and economic resilience. While industry has an important role in supporting the system, ADF does not support reforms that result in an increasing transfer of biosecurity costs and responsibilities onto farmers for activities that are fundamentally undertaken for the benefit of all Australians.

The starting point for reform should be strengthening Australia's biosecurity capability, preparedness and resilience, not identifying additional avenues for recovering costs from agricultural producers.

Strengthening Capability, Not Shifting Costs

ADF supports reforms that strengthen preparedness, response and recovery capability, provided they are practical, co-designed with industry and supported by appropriate government

investment. Farmers should not be expected to absorb additional compliance, traceability, reporting or system costs without demonstrated biosecurity benefits and appropriate support.

Governments must retain a strong funding role across preparedness, response and recovery arrangements given the national economic, environmental, social and trade consequences of major biosecurity incursions. Livestock industries already contribute significantly through established emergency response arrangements such as the Emergency Animal Disease Response Agreement (EADRA). Reform should not weaken government's commitment to emergency response funding or simply shift additional risk and cost onto producers who are already contributing to the system.

Recovery arrangements must provide timely and adequately funded support, recognise the long-term impacts on farm businesses, processors and regional communities, and clearly define the respective responsibilities of governments and industry.

Similarly, reforms relating to workforce capability, operational systems and regulatory arrangements should focus on improving national capability, reducing duplication and lowering compliance costs rather than creating additional obligations for producers. Building regional workforce capacity, improving surge capability, developing practical and interoperable systems, and simplifying regulatory arrangements should remain priorities.

Sustainable Funding and Future Reform

Funding reform represents both the greatest risk and the greatest opportunity arising from this process.

ADF's position is clear. Biosecurity delivers benefits that extend far beyond the farm gate. It protects Australia's food security, export markets, public health, environmental assets, regional communities and national economy. The beneficiaries of a strong biosecurity system are all Australians, not simply agricultural producers.

For that reason, biosecurity funding must continue to reflect the substantial public benefit generated by the system. Governments must retain a central funding role and should not seek to address future funding shortfalls primarily through increased industry contributions.

ADF is particularly concerned that environmental biosecurity continues to receive insufficient attention in national funding discussions. Environmental biosecurity protects national parks, native flora and fauna, waterways, biodiversity and ecosystems that belong to all Australians. These assets are nationally significant public goods and require dedicated government investment. Funding responsibility for protecting public environmental assets should not be transferred to agricultural producers.

ADF also considers that those who create biosecurity risks should contribute appropriately to managing those risks. Greater consideration should be given to risk-based funding approaches that better recognise the role of shipping, cargo, container, mail, passenger and import pathways that introduce biosecurity risks into Australia.

Previous proposals to increase contributions from import-related pathways were not progressed, leaving a significant gap in risk-aligned funding arrangements. A more balanced funding model would place greater responsibility on those creating biosecurity risks rather than continually defaulting to farmers as the primary source of additional funding.

ADF believes the long-term solution to Australia's recurring biosecurity funding challenge is not a continual search for additional industry contributions, but the establishment of a dedicated Biosecurity Future Fund.

The dairy industry proposes consideration of a Biosecurity Future Fund as an eighth national future fund, alongside Australia's existing sovereign-style investment funds. Similar to the Future Drought Fund, Medical Research Future Fund and Disaster Ready Fund, a Biosecurity Future Fund would provide a long-term, stable and predictable source of funding for preparedness, surveillance, environmental biosecurity, emergency response capability and recovery activities.

Importantly, such a model would move biosecurity funding from a recurring budget pressure to a long-term national investment. Rather than relying solely on annual appropriations or periodic searches for additional industry contributions, governments could draw on investment earnings generated by a dedicated capital base established specifically for biosecurity purposes.

This would provide greater certainty for governments, industry and the broader community while ensuring Australia remains prepared for future biosecurity threats before they occur rather than scrambling to identify funding once a crisis emerges.

A Biosecurity Future Fund would also complement, rather than replace, existing industry cost-sharing arrangements such as EADRA. It would strengthen national preparedness, provide additional funding certainty and recognise biosecurity as a strategic national asset deserving of long-term investment.

ADF also notes that this reform process is occurring despite a long history of biosecurity reviews, inquiries and reform programs, many of which remain incomplete, partially implemented or yet to demonstrate measurable outcomes.

Successive governments have commissioned reviews into Australia's biosecurity system, including the Craik Review of Commonwealth Biosecurity Funding, the National Biosecurity Strategy, Inspector-General of Biosecurity reviews, Auditor-General examinations and parliamentary inquiries.

Many recommendations relating to preparedness capability, workforce capacity, surveillance systems, environmental biosecurity, border risk management and sustainable funding remain unfinished or continue to be progressed years after they were first identified.

From an industry perspective, the challenge facing Australia's biosecurity system is not a lack of reviews. It is a lack of implementation.

Over the past decade governments have repeatedly identified many of the same issues. Before new funding models or additional obligations are proposed, industry should be able to see what has been implemented, what remains outstanding and what measurable improvements have been achieved. Industry should not be asked to fund the next round of reforms before governments can demonstrate the outcomes of the last.

Australia's dairy farmers support reforms that genuinely strengthen Australia's biosecurity system. However, strengthening the system must not be confused with shifting responsibility for funding it. Biosecurity delivers national benefits and requires national investment.

Should you require any additional information on this issue please contact ADF via Nathan Pope Policy Manager on 0438 603 681.

Thank you for your consideration and I look forward to your response.

Yours sincerely,



Ben Bennett
President
Australian Dairy Farmers