

5 June 2026

Department of Agriculture, Fisheries and Forestry
GPO Box 858
Canberra ACT 2601, Australia
Via: Have your say portal

RE: Submission to the national biosecurity reform agenda discussion paper

Greenlife Industry Australia welcomes the opportunity to comment on the national biosecurity reform agenda discussion paper.

About Greenlife Industry Australia

Greenlife Industry Australia (GIA) is the national peak body representing Australia's nursery and green life production sector, encompassing production nurseries, retail nurseries, landscape suppliers, allied businesses, and the broader plant supply chain. The industry contributes billions to the Australian economy each year and underpins essential national priorities including urban greening, biodiversity restoration, climate resilience, and the supply of high-quality plant material to horticulture, landscaping, and environmental markets. GIA works closely with government, research partners, and industry stakeholders to strengthen biosecurity, support workforce development, and ensure the long-term sustainability and competitiveness of Australia's green life sector.

Executive Summary

Australia's biosecurity system is structurally imbalanced. Risk creators such as importers and supply chain actors do not contribute proportionately to the risks they generate, while primary producers carry the cost of preparedness, surveillance and response. The current model fails to price the negative externality created particularly by imported goods. Reform must prioritise risk adjusted funding, protect the viability of regulated nursery import pathways, and deliver nationally consistent, risk based systems that do not impose further disproportionate burdens on compliant operators.

Key Asks

- Make risk creators pay proportionately through risk adjusted importer contributions
- Prioritise near term funding reform to correct the imbalance on primary producers
- Expand the funding base to reflect biosecurity as a public good
- Protect regulated nursery import pathways as a national bottleneck for new genetics and climate resilient varieties
- Elevate national data sharing and uniform responses to close surveillance and coordination gaps
- Ensure traceability reform is risk based and practical for diverse production systems and SMEs
- Target high risk informal pathways rather than adding obligations to compliant operators
- Strengthen national coordination and practical compliance to reflect workforce and capability constraints
- Support the use of the Biosecurity Commons website as a key platform for modelling, preparedness, and response to biosecurity threats

Introduction

Australia's biosecurity system is structurally imbalanced. Those who create the greatest biosecurity risk, importers, international supply chain actors, logistics providers and other non-primary-production entities, do not adequately contribute to the funding of post-border biosecurity activities, despite being responsible for a significant proportion of pest and disease incursions. The current biosecurity model works on a cost recovery model for pre and at border biosecurity services, rather than risk adjusted pricing. This pricing does not adequately capture the negative externality and risk to primary production and the public good that imports and other inbound movements currently create. Additionally, relatively low volume pre and at border sampling regimes (when compared to jurisdictions such as the US, EU and New Zealand), limited traceability and inconsistent data sharing, creates a large gap in government surveillance and response activities.

Meanwhile, primary producers, including nursery producers, disproportionately bear the financial burden of preparedness, surveillance, response and recovery for incursions. This creates a large negative externality: risk creators impose cost and risk on producers, the public and the government without adequately paying for the consequences of their activities. The Australian public is the ultimate beneficiary of biosecurity, a public good, ensuring food and fibre security and environmental protection, yet the funding model does not reflect this ultimate benefit that justifies increases in both importer contributions and public funding in biosecurity activities to cover these funding gaps.

The proposed reforms in Table A1 of the discussion paper offer an opportunity to correct this imbalance. Their success depends on prioritising reforms that expand the funding base, embed risk proportionate contributions, and ensure that risk creators pay their fair share, through mechanisms such as an import risk levy.

Finally, it remains essential that government embed structured, ongoing industry representation within national decision-making forums, ensuring multiple seats at the table and a genuine, continuous consultation pathway.

Funding Mechanism Reform Must Be a Near Term Priority

The discussion paper positions assessment of alternative funding mechanisms and changes to national cost sharing arrangements as medium to long term reforms. This sequencing is not appropriate given the current inequity in the system and the immediate financial burden placed on agriculture and the public at large. Primary producers are currently bearing the risk created by other market actors, particularly importers and supply chain actors from whom they receive no marginal benefit. In many cases, primary producers are in fact competing with the importers of primary produce, whose unpriced biosecurity risk is transferred directly onto them and the Australian public. This is not only inequitable, it is economically unsustainable.

The Department, states and territories have limited resources to inspect, track and trace incoming cargo and personnel. Under low total volume sampling regimes of pre border and at border vectors the system is structurally incapable of detecting all high-risk material, meaning that risk creators continue to externalise their costs onto primary producers.

Without near term funding reform, these constraints will worsen as trade volumes increase and pathways diversify.

Delaying funding reform until the medium or long term would:

- entrench the current negative externality,
- perpetuate under investment in preparedness and surveillance,
- leave emergency response arrangements under resourced, and
- continue to expose primary producers to risks they did not create.

For these reasons, funding mechanism reform must be elevated to a near term priority, forming the foundation upon which all other reforms depend.

National Data Sharing Arrangements and Response Uniformity Across Jurisdictions

The reform themes within the discussion paper relating to national surveillance data sharing, legislative change to support data exchange, and greater uniformity in response arrangements across states and territories should be elevated to high-priority reforms. These elements are essential to building a coherent national biosecurity system that can detect, trace and respond to incursions with the speed and consistency required to protect Australia's agricultural industries and natural environment.

Australia's current biosecurity architecture is marked by inconsistent data systems, variable reporting standards and differing response triggers and protocols across jurisdictions. These inconsistencies create operational blind spots, reduce national situational awareness and slow

down coordinated action during pest and disease events. Without nationally consistent data flows and interoperable systems, the country cannot achieve the level of preparedness, traceability and response capability needed for a modern, risk-based biosecurity system.

These reforms must be treated as high priority because they are foundational to early detection and rapid response. National data sharing enables real-time visibility of emerging threats, allowing jurisdictions to act quickly and consistently. When data standards differ or systems cannot communicate, critical information becomes delayed, incomplete or incompatible, undermining the effectiveness of the entire system. Uniform response arrangements are equally important because they ensure that all jurisdictions apply the same thresholds, definitions and operational protocols. This reduces confusion, eliminates duplication and ensures that responses are not weakened by uneven implementation. National alignment also supports more efficient use of limited resources, as states and territories currently invest in separate systems and processes that often cannot communicate with each other. Greater consistency would reduce duplication and allow resources to be directed toward frontline capability rather than administrative overhead. These reforms are also essential for the future development of national traceability and surveillance platforms, which cannot function without consistent data inputs and shared governance arrangements.

Achieving national alignment will inevitably take time but is well worth the effort. It will require new or amended deeds, agreements and intergovernmental instruments, as well as alignment of existing state systems with national platforms. Clear rules on data ownership, access and use will need to be established, and shared governance structures will be required to oversee the transition. Significant investment will be needed to upgrade systems and create integration pathways, and mechanisms will be necessary to support states with limited capability or resourcing. States and territories have different legislative frameworks, operational models and levels of digital maturity. Some have invested heavily in bespoke systems that may not align easily with national platforms, while others may require substantial support to transition. These challenges mean that reform will require careful negotiation, co-design and incentive structures that encourage alignment rather than impose it.

Despite the complexity, these reforms are far too important to defer. Without national data sharing and uniform response arrangements, surveillance gaps will persist, traceability systems will remain incomplete and emergency responses will continue to vary in speed and effectiveness. The national system will remain vulnerable to avoidable delays and inconsistencies that compromise Australia's ability to prevent, detect and manage biosecurity threats. For these reasons, national data sharing arrangements and response uniformity across jurisdictions must be elevated to high-priority reforms and pursued with urgency, supported by strong intergovernmental mechanisms and a clear commitment to national consistency.

Distinguishing Import Pathways and Risk Profiles

A reformed biosecurity system should clearly distinguish between different import pathways and their respective risk profiles, in particular the highly regulated legal pathways used for live plant material and nursery stock. Compliant nursery importers operate under extensive pre-border, border and post-entry quarantine requirements, and many are primary producers. These approved pathways should be recognised as distinct from broader legal import pathways that may involve different commodities and risk settings, as well as from informal or non-compliant pathways.

Viability of Approved Nursery Import Pathways & Industry Bottlenecks

Commercial nursery importers support strong biosecurity controls and want to operate through approved systems, but those systems need to remain practical and economically viable. Plant import and post-entry quarantine costs are already significant, and any further increases in inspection, sampling, documentation or cost recovery must be carefully targeted so they do not place disproportionate pressure on already highly regulated nurseries and the broader industry. The import pathway for live nursery genetics is a critical national bottleneck. The broader nursery, landscape, amenity and environmental sectors rely on a relatively small number of specialist importers who bring in new varieties and genetic material. If these pathways become financially or operationally unviable, the entire industry's access to new genetics, climate-resilient varieties and innovation is constrained. Live plant imports generate benefits well beyond the importing nursery, including genetic diversity, urban greening, amenity landscapes, environmental plantings and climate resilience. In many cases, nurseries carry significant compliance and biosecurity costs on behalf of broader public, environmental and commercial outcomes.

National Traceability Reform need to be Risk-Based and Proportionate

National traceability reform must be risk-based and proportionate to the diversity of nursery production and supply systems, while remaining practical for industry to implement. Any national model will need to address record-keeping burden, interoperability with existing systems, small and medium enterprise capability, data ownership and access, and the risk of scope creep. Consumer-facing post border traceability should only be pursued where there is clear evidence that the biosecurity benefit outweighs the cost and complexity for highly diverse production systems.

Workforce, Capability and Practical Implementation

Reform must reflect existing workforce and capability constraints across industry. Many nursery businesses, particularly small and medium enterprises, have limited capacity to absorb further compliance and administrative obligations. Additional regulation will not improve biosecurity outcomes if it places disproportionate pressure on approved pathways. The reform agenda should strengthen national coordination, resourcing and risk-based oversight while making legal compliance more practical and worthwhile for those already doing the right thing.

Biosecurity Commons website

GIA would like to see DAFF actively support the use of the Biosecurity Commons website as a key platform for modelling, preparedness, and response to biosecurity threats. Leveraging this shared resource would enhance collaboration across government, industry, and research sectors, enabling more robust data analysis and real-time insights. Use of the platform will facilitate faster, evidence-based decision-making, improve response times, and ensure more effective management of emerging risks.

Conclusion

GIA appreciates the opportunity to provide input and would welcome further engagement with DAFF and the government as the review progresses.

To discuss the recommendations outlined in this submission, please contact Sean Cole, CEO at sean.cole@greenlifeindustry.org.au or on 0435 991 370.

Yours sincerely,



Sean Cole,
CEO