



Department of Agriculture, Water and the Environment

National Biosecurity Strategy: Feedback on Consultation Draft

March 2022

About the Australian Fresh Produce Alliance

The Australian Fresh Produce Alliance (AFPA) is made up of Australia's key fresh produce growers and suppliers. The members include:

- Costa Group
- Perfection Fresh
- Montague
- One Harvest
- Pinata Farms
- Fresh Select
- Mackay's Banana Marketing
- Driscoll's
- LaManna Premier Group
- Rugby Farming
- Freshmax
- Fresh Produce Group.

These businesses represent:

- half the industry turnover of the Australian fresh produce (fruit and vegetables) sector - \$4.5 billion of the \$9.1 billion total
- a quarter of the volume of fresh produce grown in Australia - 1 million of the 3.9 million tonne total
- more than a third of fresh produce exports - \$410 million of the \$1.2 billion export total
- more than 1,000 growers through commercial arrangements, and
- more than 15,000 direct employees through peak harvest, and up to 25,000 employees in the grower network.

The key issues the AFPA is focusing on include:

- packaging and the role it plays in product shelf life and reducing food waste landfill,
- labour and the need for both a permanent and temporary supply of workers,
- market access to key export markets for Australian produce,
- product integrity both within and outside of the supply chain,
- pollination and research into alternative sources, and
- water security, including clear direction as to the allocation and trading of water rights.

The AFPA's aim therefore is to become the first-choice fresh produce group that retailers and government go to for discussion and outcomes on issues involving the growing and supply of fresh produce.

Products grown by AFPA Member companies include:

Apples	Blueberries	Cherries	Nectarines	Raspberries
Apricots	Broccoli	Fioretto	Onions	Salad leaf
Asparagus	Broccolini	Green Beans	Oranges	Spinach
Avocado	Brussel Sprouts	Herbs	Peaches	Strawberries
Baby Broccoli	Butternut	Lemons	Pears	Sweet Corn
Baby Corn	Pumpkin	Lettuce	Pineapples	Table grapes
Bananas	Cabbage	Mandarins	Plums	Tomatoes
Beetroot	Cauliflower	Mango	Potatoes	Water Cress
Blackberries	Celery	Mushrooms	Cucumber	Wombok



Summary

The National Biosecurity Strategy consultation document outlines the importance of a robust biosecurity system to all Australians. With regards to fresh produce, this system ensures that there is fresh fruit and vegetables available to all Australians. Access to fresh fruit and vegetables is vital, with significant private and public benefits, including better individual health, lower levels of illness and disease in the population and reduced spending in health budgets on preventative illness and chronic disease.

Understanding the importance of biosecurity in Australia's food security demonstrates the significant public benefit of investment in robust biosecurity systems. While collaboration across all stakeholders to deliver outcomes is critical and clearly identified in the Strategy, the important role of all levels of Government in facilitating and funding biosecurity systems for the public good must continue to be clearly articulated.

The scope of the biosecurity strategy correctly identifies the importance of protecting Australia from biosecurity outbreaks and incursion, and the action areas identified reflect this scope. While the scope of the strategy identifies that established exotic pests will be considered, broadly, the strategy and 6 key action areas are focussed on the prevention of incursions, rather than any ongoing management necessary for established exotic pests and diseases. The management of established pests and disease in the fresh produce industry is of significant importance as without appropriate management and funding arrangements, there is the potential to affect domestic trade and supply of fresh fruit and vegetables and disrupt export market opportunities.

Established pests continue to pose a significant risk to the fresh produce sector. Fruit fly (Queensland Fruit Fly and Mediterranean Fruit Fly) is one of the most significant pests that the Australian fresh produce industry is managing. A more targeted focus management program by all stakeholders (government, growers, supply chain, local communities) will benefit all Australians through the more cost effective delivery of high quality produce to Australians. Importantly, concerted action on a significant pest such as fruit fly will also have a range of flow on effects on biosecurity culture within Australia and systems and processes which can be leveraged for broader biosecurity efforts (on other pests).

In terms of progressing biosecurity outcomes, it is important that commercial operators involved in the production of food, or within the supply chain are engaged as part of the development of actions and implementation planning. Commercial operators typically operate at the intersection of policy, regulatory requirements and everyday management of biosecurity. The priority for the fresh produce industry is to ensure ongoing access of fruit and vegetables to all Australians, and in order to facilitate this outcome it is critical that actions undertaken as part of this strategy are delivering outcomes for food producers.

The Australian Fresh Produce Alliance (AFPA) and member companies would welcome further engagement from the Department on how best to address biosecurity concerns and objectives as they relate to fresh produce.



Responses to questions on the National Biosecurity Strategy consultation draft

1. Scope of the strategy

The scope of the biosecurity strategy correctly identifies the importance of protecting Australia from biosecurity outbreaks and the action areas identified reflect this scope. The scope of the national strategy is outlined as including “consideration of exotic and established exotic pests, weeds and diseases, but will not extend to endemic species or human biosecurity”

While the scope of the strategy identifies that established exotic pests will be considered, broadly, the strategy and 6 key action areas are focussed on the prevention of incursions, rather than any ongoing management necessary for established exotic pests and diseases. The management of exotic pests and disease in the fresh produce industry is of significant importance as without appropriate management and funding arrangements, there is the potential to affect domestic trade and supply of fresh fruit and vegetables and disrupt export market opportunities.

Ultimately, it is the practical outcomes of a robust biosecurity system that must be front of mind when approaching the strategy’s scope and purpose. For the fresh produce sector, the outcomes being sought are the ability to ensure the ongoing production of high quality, affordable and accessible food for Australians.

2. Roles within the biosecurity system

As outlined in the consultation draft, the Australian biosecurity system is complex, with the involvement of commercial businesses, consumers, industry and all levels of government. The “How our biosecurity system works” diagram accurately identifies roles within the biosecurity system, however identifying industry more specifically may be beneficial in ensuring that other stakeholders are clear of their role in the system.

In the fresh produce industry, this definition would include commercial fresh produce producers (i.e. growers), wholesalers, processors, exporters and retailers of fresh food at a minimum. This area could be more clearly articulated or described as supply chain – assuming this is the intent of the “industry” role.

The role of research organisations, particularly Research and Development Corporations is critical in biosecurity. With regards to the fresh produce sector, the levy collected across all fruits and vegetables and administered by Hort Innovation is critical to future biosecurity outcomes. Commercial fresh produce producers contribute significantly to RDCs via levy contributions, and these contributions become critical in the biosecurity system that in principal serves to benefit industry and community over a single individual producer. Within the fresh produce sector, the RDC and relevant research organisations must perform a greater role in terms implementing, and contributing funding to an effective national framework and regional action on key pests (such as fruit fly) for biosecurity.

3. Biosecurity risks and opportunities

The strategy document outlines the importance of a robust biosecurity system to all Australians. With regards to fresh produce, this system ensures that there is fresh fruit and vegetables available to all Australians. Access to fresh fruit and vegetables is vital, with significant private and public benefits, including better individual health, lower levels of illness and disease in the population and reduced spending in health budgets on preventative illness and chronic disease.



Understanding the importance of biosecurity in Australia’s food security demonstrates the significant public benefit of investment in robust biosecurity systems. While collaboration across all stakeholders to deliver outcomes is critical and clearly identified in the strategy, the important role of all levels of government in facilitating and funding biosecurity systems for the public good must continue to be clearly articulated.

4. Actions

The initial actions as outlined demonstrate a collaborative approach to Australia’s biosecurity system. While engaging all stakeholders and raising general awareness of biosecurity is valuable, a greater level of focus should be placed on activities that deliver the outcomes of better biosecurity risk management; specifically actions with the *Coordinated preparedness and response* and *sustainable investment* priority areas.

From an industry and commercial perspective, there is an immediate priority to support better biosecurity management, particularly with regard to established exotic pests to improve domestic and international trade opportunities. As previously outlined it is the practical outcomes of biosecurity that must be prioritised for delivery; that is actions that ensure that Australians have ongoing access to quality, safe and affordable fruit and vegetables.

While the strategy appears to focus on prevention of incursion, established pests continue to pose a significant risk to the fresh produce sector. Fruit fly (Queensland Fruit Fly and Mediterranean Fruit Fly) is one of the most significant pests that the Australian fresh produce industry is managing. A more targeted focus management program by all stakeholders (government, growers, supply chain, local communities) will benefit all Australians through the more cost effective delivery of high quality produce to Australians. Importantly, concerted action on a significant pest such as fruit fly will also have a range of flow on effects on biosecurity culture within Australia and systems and processes which can be leveraged for broader biosecurity efforts (on other pests)’

5. Implementation and Review

It is important that commercial operators involved in the production of food, or within the supply chain, are engaged as part of the development of actions and implementation planning. Commercial operators typically operate at the intersection of policy outcomes, regulatory requirements and everyday management of biosecurity. The priority for the fresh produce industry is to ensure ongoing access of fruit and vegetables to all Australians, and in order to facilitate this outcome it is critical that actions undertaken as part of this strategy are delivering for food producers.

The Strategy notes that an initial action to be undertaken under the Sustainable investment priority is to “*complete the development and implementation of a system performance and evaluation framework to inform future investment decisions*” (pg. 33). This appears to be a key piece of work that would form part of the evaluation framework of investments made in relation to the broader strategy. The components of this performance and evaluation framework will be critical to understand in terms of reviewing the broader strategy.

With regard to the review of the National Biosecurity Strategy, a five year review of the plan may be appropriate assuming that areas of activity and relevant actions have their own plans which could be evaluated and reviewed with a greater level of frequency.

