



AFPA Submission:

National Food Security Strategy
Department of Agriculture, Fisheries and Forestry

October 2025

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 Farms
- Pinata Farms
- Fresh Select
- Mackay's Marketing
- Driscoll's
- Australian Produce Partners
- Premier Fresh Australia
- Rugby Farming
- Fresh Produce Group

These businesses represent:

- half the industry turnover of the Australian fresh produce (fruit and vegetables) sector - \$12 billion total
- a quarter of the volume of fresh produce grown in Australia - 6.5 million tonne total
- more than a third of fresh produce exports - \$1.7 billion export total
- more than 1,000 growers through commercial arrangements, and
- more than 20,000 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 Members include:

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

Executive Summary

The Australian Fresh Produce Alliance (AFPA) welcomes the opportunity to contribute to the Department of Agriculture, Fisheries and Forestry's (DAFF) development of a National Food Security Strategy (the Strategy).

Australia's food system is one of the nation's most valuable assets and of paramount importance. It underpins household health and wellbeing, supports economic prosperity, sustains regional communities, and strengthens Australia's reputation as a trusted trading partner and regional food supplier. Australia is often considered food secure because it is a net exporter of food (with around 70% of production sold internationally), however being a net exporter is not the same as being food secure. This shallow view overlooks significant challenges and vulnerabilities in the system. Rising input and energy costs, labour shortages, global volatility, biosecurity threats, extreme weather events, and complex regulatory settings are eroding the resilience of farm businesses and supply chains. Unless addressed, these vulnerabilities will compromise both the affordability of food for Australian households and the viability of the industries that produce it.

The AFPA represents eleven of Australia's largest fresh produce growers and suppliers, accounting for more than half of industry turnover and a third of fresh produce exports. This gives the AFPA a unique perspective on the risks and opportunities facing the sector, and a strong basis for proposing practical solutions. The AFPA believes the Strategy must look beyond short-term cost-of-living pressures and take a long-term, structural view of national food security. Secure, reliable, and affordable food supply depends fundamentally on ensuring that the food system itself is strong and resilient in a rapidly changing and increasingly challenging operating environment.

By securing critical inputs, enabling viable production, safeguarding biosecurity, and building resilience into supply chains, the Strategy will complement broader economic and social policies that address household cost-of-living pressures. Together, these approaches will ensure Australians continue to access nutritious, affordable food while reinforcing the foundations of Australia's agricultural competitiveness and regional food security contribution.

Guiding Principles

AFPA recommends that the Strategy be built on the following principles:

1. **Supply as the foundation** – Food security begins with the availability, stability, and sustainability of supply. Without reliable supply, affordability and access cannot be achieved.
2. **Prioritisation of risks** – Adopt a tiered framework that classifies risks as *critical*, *disruptive*, or *business as usual*, ensuring proportionate and targeted government responses.
3. **Whole-of-government approach** – Food security intersects with labour, energy, transport, trade, migration, health, and more. Delivery must be coordinated across portfolios, led by Prime Minister and Cabinet (PM&C), and integrated across federal, state, territory, and local governments.
4. **Viability of production** – Recognise that secure food supply depends on profitable and resilient farm businesses, supported by policy stability, affordable inputs, and competitive market conditions.
5. **A living strategy** – Adopt a long-term (e.g. 20 year) strategy with regular reviews (every 3–5 years) to adapt to new risks, evolving markets, and unforeseen shocks.

Priority Areas for Action

The Strategy should direct effort and resources to six priority areas:

1. **Identifying and Securing Critical Inputs**
 - Conduct a national audit of critical inputs (fuel, fertilisers, packaging, energy, seed, etc.).
 - Reduce vulnerabilities to import disruptions and price shocks through contingency measures and diversification.

2. Strengthening Domestic Production and Supply Chains

- Support farm business viability through reducing regulatory duplication, barriers to capital and investment in enabling infrastructure.
- Invest in more resilient transport corridors and diversified logistics routes to better assure supply.

3. Developing a Productive and Stable Workforce

- Establish a dedicated Harvest Work Visa to provide certainty for seasonal labour.
- Invest in regional housing, transport, and services to attract and retain workers.
- Build skills and training pipelines to strengthen domestic workforce capacity.

4. Safeguarding Biosecurity

- Recognise biosecurity as a public good that benefits all Australians.
- Increase predictable, long-term government funding for surveillance, preparedness, and rapid response capacity.
- Strengthen national coordination and standards.

5. Trade and Market Access

- Recognise that export strengthens domestic supply and affordability.
- Expand horticulture's representation in trade negotiations.
- Boost DAFF's scientific and negotiation capacity to accelerate market access.

6. Promoting Innovation and Sustainability

- Align sustainability policies with productivity and food security objectives to avoid unintended consequences.
- Ensure reforms in areas such as packaging, emissions, and waste are holistic, considering environmental impacts beyond a single concern and across other portfolios, e.g. health.
- Support adoption of sustainable practices (precision agriculture, protected cropping, water-use efficiency) through incentives, R&D, and extension services.

Proposed Approach and Timeline

The AFPA recommends a structured, staged approach to implementation. Actions should be prioritised according to their level of risk and complexity:

- **Business-as-usual actions** (such as reducing regulatory duplication or improving trade negotiation capacity) should be achievable within 1–2 years.
- **Disruptive-level risks** (such as regional supply-chain infrastructure or workforce housing) are more complex and should be targeted within 3–5 years.
- **Critical risks** (such as improving domestic fuel security) require medium- to long-term planning and action, over 5–10 years, with cross-portfolio coordination.

The Strategy should also clearly attribute responsibilities to relevant Commonwealth departments and specify where state and territory governments play a direct delivery role. This clarity of accountability will ensure that momentum is maintained, resources are targeted appropriately, and industry has confidence that government action will align with the scale of risk.

A robust and coordinated National Food Security Strategy is essential to protecting the availability and affordability of food for Australian households, while safeguarding the viability of the industries that produce it. By focusing on critical inputs, domestic production, workforce stability, biosecurity, trade, and innovation, the Strategy can provide the foundations for long-term resilience. This approach will ensure that Australia remains food secure, continues to supply its region, and strengthens the prosperity of its agricultural industries and communities.

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1. Introduction

The Australian Fresh Produce Alliance (AFPA) welcomes the opportunity to respond to the Department of Agriculture, Fisheries and Forestry's (DAFF) discussion paper on the Commonwealth Government's National Food Security Strategy.

The discussion paper seeks feedback on the principles, priority areas, and whole-of-system considerations that will shape the scope of *Feeding Australia: National Food Security Strategy* (the Strategy). The AFPA strongly supports this process and the Government's recognition that food security must be considered a national priority, not just an agricultural issue.

As the discussion paper notes, "*Australia is committed to safeguarding and enhancing our food secure status in a changing and resource constrained world and maintaining its position as a reliable and secure source of food for both domestic and international needs.*" Achieving this goal requires a strategy that is forward-looking, comprehensive, and focused on addressing the structural pressures and vulnerabilities that threaten Australia's ability to reliably produce and deliver food.

While the rising cost of living and household food insecurity are pressing social challenges, these issues cannot be solved through food security policy alone. The Strategy must concentrate on strengthening the foundations of the food system itself: securing critical inputs, supporting viable and productive farm businesses, building a skilled and stable workforce, safeguarding biosecurity, growing trade, and supporting innovation and sustainability.

The AFPA is committed to working constructively with government and other stakeholders to ensure the Strategy is practical, evidence-based, and forward-looking. With the right policy settings, Australia can safeguard the long-term viability of its food production base, maintain stable and affordable food access for households, and continue its role as a trusted trading partner in a volatile global environment.

2. Fresh Produce Industry Snapshot

The fresh produce industry and its ongoing supply of nutritious and safe fruit and vegetables plays a crucial role in the health and well-being of Australia's population, is a major contributor to the economy, and underpins national food security. A profitable and sustainable fresh produce industry is in Australia's national interest.

The following key facts and information, sourced largely from Hort Innovation's *Australian Horticulture Statistics Handbook 2023-24*¹, provide valuable context and a snapshot of the fresh produce industry:

- In 2023-24, the total production value of the fresh produce industry was \$12.5 billion
- It is estimated that the fresh produce industry directly supports between 65,000-80,000 roles²
- Australia's diverse climate and geography enables more than 100 varieties of fruit and vegetable to be grown productively in regions around the country.
- Australia produced over 6.5 million tonnes of fresh produce in 2023-24, the majority for fresh supply to the domestic market (61%) and processing (29%).
- Only 10% of Australian fresh produce is exported, unlike broader agriculture that exports around 72% of produce.
- Australia imports less than 3% of produce for fresh supply, meaning over 97% of fresh fruits and vegetables consumed in Australia is grown in Australia.

¹ [Australian Horticulture Statistics Handbook 2023/24](#) - Hort Innovation

² [Contribution of Australian horticulture industry](#) – Centre for International Economics

3. Guiding Principles for the Strategy

3.1 Supply (availability, stability and sustainability) is the foundation of food security

The Discussion paper rightly acknowledges the challenge of household food insecurity and rising cost-of-living pressures. However, the framing of the Strategy risks conflating short-term affordability concerns with the long-term structural challenge of national food security. Addressing food prices in isolation will not resolve the deeper vulnerabilities that threaten Australia's capacity to provide reliable, safe, and nutritious food to its people and trading partners over the decades ahead.

For reference, the Discussion Paper provides the following definitions in *Table 1 Dimensions of food security* on page 3.

- **Availability** - Having a quantity and quality of food sufficient to satisfy the dietary needs of individuals, free from adverse substances and acceptable within a given culture, supplied through domestic production or imports.
- **Stability** - Having the ability to ensure food security in the event of sudden shocks (e.g. an economic, health, conflict or climatic crisis) or cyclical events (e.g. seasonal food insecurity).
- **Sustainability** - Food system practices that contribute to long-term regeneration of natural, social and economic systems, ensuring the food needs of the present generations are met without compromising the food needs of future generations.

An individual or household's food security (that is, their ability to consistently access adequate, safe and nutritious food) depends first on the availability, stability and sustainability of food in the system, and second on the economic pressures and constraints that shape their capacity to obtain it (see Appendix 1). If food is not available in sufficient quantity or reliability, then affordability and access issues cannot be addressed. Put simply, households cannot secure food that does not exist within the supply system.

Australia is often considered food secure because it is a net exporter of food, with around 70% of production sold internationally, and the Discussion Paper makes a similar assumption. However, being a net food exporter is not the same as being food secure. This view overlooks significant vulnerabilities in the system, many of which remain unknown or do not have an adequate mitigation plan that is collectively understood. For example, the system depends heavily on imported critical inputs such as fuel, fertilisers, crop protection products, seed, packaging, etc. It's not simply about imports either, Australia also has domestic vulnerabilities, for example rising electricity and gas prices impact production, processing and cold storage, and key transport corridors have recently been cut by floods, disrupting supply.

Identifying these vulnerabilities and putting mitigation measures in place is therefore critical to the long-term maintenance of Australia's food production base, which is in turn the foundation of both domestic household food access and Australia's strategic role in global stability.

While household food security is a critical issue, it is driven primarily by broader economic and social factors, such as wages, employment security, housing affordability, and utilities costs. The affordability issues are being addressed through broader government economic, social, and welfare policies and initiatives. Further work is required to reduce the number of food insecure households, however it should be undertaken through a specific, dedicated strategy or initiative focused on poverty alleviation, social security, or cost-of-living relief, not through a National Food Security Strategy which must focus on the foundations of our food system and security.

Recommendation 1: *The Strategy should be framed around safeguarding the availability, stability and sustainability of Australia's food supply as the necessary precondition for both national and household food security.*

3.2 Categorise and Prioritise Issues as Critical, Disruptive, or Business as Usual

Not all challenges to Australia's food system are equal in scale or consequence. To ensure the Strategy directs resources and attention where they are most needed, risks and issues should be categorised and prioritised as either critical, disruptive, or business as usual.

- **Critical risks** are systemic shocks that jeopardise national food security by preventing or severely curtailing the supply of food. Examples include a prolonged disruption to fuel imports, a major biosecurity incursion, or severe workforce shortages. These events require whole-of-government coordination, contingency planning, and integration into national security frameworks.
- **Disruptive issues** are sector-specific or temporary challenges that affect availability, cost, or distribution in particular areas but do not threaten overall national food security. For instance, delays in importing a seed variety, interruptions to packaging supply, or localised transport disruptions (e.g. from a flooding event). These events require targeted government support and industry adaptation but can often be managed through diversification, substitution, or short-term adjustments.
- **Business-as-usual pressures** are the ongoing and structural challenges that producers and supply chain participants face as part of normal operations. These include seasonal weather fluctuations, overburdensome regulatory compliance, skills shortages, competition pressures, pest and weed management, and broader economic factors such as high energy costs, regional accommodation shortages, etc. While important, these issues are less of an immediate threat to national food security but relate more to the long-term viability of the sector and therefore sustainability of the supply of food.

By explicitly categorising risks in this way, the Strategy can prevent food security planning from being overwhelmed by everyday challenges, while ensuring that critical risks are given the high-level attention they demand, and disruptive risks are managed proportionately. This approach creates clarity for government, industry, and the community about where policy and investment should be prioritised.

Recommendation 2: *The Strategy should adopt a tiered framework to categorise and prioritise risks to the food system as critical, disruptive, or business as usual, ensuring that government responses are proportionate, targeted, and effective.*

3.3 Adopt Whole-of-Government Approach to National Food Security

Food security is not solely the responsibility of the agricultural sector, it intersects with labour and migration, energy security, transport and logistics, trade and foreign policy, defence, social and health policy. As the discussion paper notes, responsibility is spread across all levels of government (federal, state and territory, and local) and within the Commonwealth alone, 11 portfolios have a role in influencing the food system and food security outcomes.

The Strategy and the delivery of its recommendations should therefore be positioned as a whole-of-government initiative, with strong governance structures to ensure coordination and accountability across all relevant portfolios and jurisdictions. Delivery should be led by the Department of the Prime Minister and Cabinet (PM&C), which is best placed to coordinate between the various relevant departments and to ensure vertical integration between federal, state/territory, and local government responsibilities. This governance structure must also be supported by ongoing and formalised consultation with industry, extending beyond the advisory National Food Council, to ensure the Strategy remains grounded in practical industry insight.

Strong governance arrangements will also provide for crisis coordination. When critical, and potentially catastrophic risks emerge, such as fuel disruption, severe workforce shortages, or a major biosecurity incursion,

government must be able to activate a coordinated, whole-of-government response in partnership with industry. This requires not only forward planning but also clear lines of authority and decision-making that are agreed upon before crises occur.

Recommendation 3: *The Strategy should establish strong whole-of-government governance arrangements, led by PM&C, with clear accountability and coordination across portfolios and levels of government, to ensure food security is treated as a national priority. These arrangements must be supported by transparent reporting, mechanisms for industry partnership, and pre-defined crisis coordination protocols.*

3.4 Ensure the Viability of Australia's Food Production Industry

National food security depends fundamentally on the long-term viability, competitiveness, and sustainability of Australia's food and agricultural sector. The Strategy must acknowledge and reflect that resilient, profitable farm businesses are the backbone of a secure food supply.

Australia's farmers are currently facing one of the steepest increases in production costs in decades. Data from the Australian Bureau of Agricultural and Resource Economics and Sciences (ABARES)³ shows that total farm cash costs rose by 39.6% between 2019–20 and 2024–25, with key drivers being:

- fertiliser up by 71.3%
- fuel costs up by 67.4%
- electricity up by 60%
- labour up by 35.5%

While some of these pressures originated during the COVID-19 period and global supply-chain shocks, many have since become driven by domestic factors that are expected to persist. Notably, 58% of the increase in electricity costs and 22% of labour cost increases have occurred since 2021–22, and both are projected to climb further in 2025–26. Given that labour accounts for roughly 50% of the cost of producing fruits and vegetables, shelf prices are likely to continue rising, significantly squeezing both producers and consumers.

These cost pressures directly undermine industry viability, compromising producers' ability to reinvest, innovate, and maintain production levels, weakening both domestic supply and export capacity. Without targeted measures to address rising input costs and other threats to the sector's longevity, Australia risks eroding the very foundation of its food security. Ensuring the viability of producers is not only a matter of industry survival, it is essential to maintaining affordable food access for households and sustaining Australia's role as a reliable food exporter in the region.

Recommendation 4: *The Strategy must explicitly recognise and support the long-term viability and competitiveness of Australia's agriculture sectors through policy measures that address cost pressure, strengthen producer resilience, and enable continued productivity-enhancing investments.*

3.5 A Living Strategy: Timeframes, Review, and Adaptability

Food security risks are dynamic and constantly evolving as described in the Discussion Paper. As seen by the COVID-19 pandemic and conflict overseas, there are unforeseen risks that can create great instability and threaten Australia's food security. To remain relevant, the Strategy must be framed on a long-term horizon but with mechanisms to adjust priorities as circumstances evolve, and to address short term objectives.

Periodic review is essential to ensure the Strategy remains a living document rather than a one-off plan. Formal reviews should occur every three to five years, supported by public reporting, to provide transparency and accountability. This cycle will allow government and industry to incorporate the latest data, emerging threats,

³ ABARES - [Commodities September Quarter 2025 - Statistical tables](#)

and lessons from recent events into food security planning, ensuring Australia's approach is adaptable, forward-looking, and capable of addressing both anticipated and unforeseen challenges. Broadly, the strategy timeline could ultimately align with other relevant 2050 objectives, allowing time to adopt more significant changes.

Recommendation 5: *The Strategy should be established on a long-term horizon (20+ years) but be subject to periodic review (e.g. every 3–5 years) to ensure it adapts to new risks, changing circumstances, and evolving national priorities.*

4. Priority Areas

4.1 Identifying and Securing Critical Inputs

The importance of securing Australia's access to critical inputs for food production and supply has long been recognised. Industry statements and submissions to previous Parliamentary Inquiries into Australia's national food security have consistently called for stronger government action to identify and safeguard the inputs and enablers that underpin the food system. These contributions reflect a shared recognition that while Australia produces abundant food, the system's dependence on vulnerable, and even poorly understood, inputs pose a significant risk.

There are some obvious critical inputs, such as fuel, fertilisers, labour, and packaging, that are widely acknowledged as essential to food production and supply. However, many others remain unknown or not collectively understood, particularly when viewed across the entire food system. Inputs may be domestically manufactured (such as electricity or some packaging) or imported (such as fuel, fertilisers, and crop protection products). Each carries different vulnerabilities and different implications for food security.

Undertaking a comprehensive audit of supply chain inputs would be a critical step towards building national food security. An audit would help identify key dependencies, measure exposure to external shocks, and prioritise areas for resilience-building. Importantly, such an exercise should not treat all inputs as equal, but instead categorise their criticality using the framework outlined in Principle 2 (critical, disruptive, or business as usual). For example, disruption to liquid fuel imports would represent a critical risk with immediate national implications, while interruptions to a niche packaging product may be disruptive, but not threaten Australia's food security as a whole.

Securing the supply of critical inputs is also directly tied to ensuring affordability of food for consumers. Even when inputs are domestically produced, such as electricity, volatility or sustained increases in prices undermine business viability and flow through to higher retail prices. Between 2019–20 and 2024–25, electricity costs for farm businesses rose by 60%. In this case, "securing" the input is not only about availability but also about ensuring it can be accessed at a stable, viable price. ABARES stated in its most recent Agricultural Commodities Report that input prices for agrifood producers are expected to remain historically elevated in 2025–26⁴. Government action to reduce volatility in the cost of essential inputs is therefore one of the most effective ways to support industry in keeping food affordable for Australian households.

Critical Inputs Requiring Priority Attention

Fuel – Australia's food system, like much of its economy, is critically dependent on fuel imports for on-farm operations and transport from regional producers to markets. A prolonged disruption to fuel imports would immediately compromise the ability to harvest, store, and distribute food, making this one of the most catastrophic risks to national food security.

Labour – Covered further in section 4.3, Labour (both seasonal and skilled) is one of the most critical enablers of food production, especially in horticulture. The vast majority of Australia's fruit and

⁴ ABARES - https://daff.ent.sirsidynix.net.au/client/en_AU/search/asset/1036921/0

vegetable production depends on the industry's ability to access a harvest workforce, tens of thousands of workers. Shortages directly translate into reduced supply, making severe workforce shortages a critical risk to the supply of nutritionally vital fresh produce.

Energy – Energy is a fundamental input across the food system, from irrigation and refrigeration to processing, storage, and transport. Costs for producers have risen steeply and these increases flow directly through to consumer food prices. Because energy is domestically produced, securing this input is as much about ensuring stable, affordable pricing as it is about physical supply. Major disruptions to electricity generation or distribution would have catastrophic consequences for food availability, while ongoing price volatility undermines farm viability and affordability for households.

Fertilisers and Crop Protection Products – Australia imports a large share of its fertiliser and crop protection needs. Global supply chain shocks, such as those triggered by the COVID-19 pandemic and geopolitical conflict, demonstrated the vulnerability of this reliance. Disruptions would reduce yields, constrain production, and place upward pressure on food prices.

Packaging and Processing Inputs – Packaging is essential to the provision of most food, ensuring its integrity in the supply chain, prolonging shelf-life, supporting food safety and quality, particularly for perishable goods. Australia relies heavily on imported packaging materials (such as cardboard, plastics, and films) and finished products (such as punnets and trays). A disruption to these imports would constrain the ability to move produce through the supply chain, resulting in wastage and shortages. While not necessarily catastrophic at a national level, such disruptions could completely remove certain products from retail shelves.

Seed and Planting Material – Specialist seed varieties and planting materials are often imported, particularly for horticultural crops. A disruption to seed imports would not immediately halt food supply but could create medium-term constraints on production and limit crop diversity.

Beyond the inputs outlined above, there are many others that underpin Australia's food production system which also require consideration, including access to capital, machinery, spare parts, transport equipment, and more. Australia also imports food, including fresh produce such as citrus and table grapes, to bridge seasonal gaps in domestic supply and meet consumer demand. While these imports help smooth availability, they also expose Australia to external risks in international markets and highlight the importance of a resilient domestic production base. Taken together, these examples reinforce the need for a comprehensive national audit of critical inputs, which would map dependencies (both domestic and imported), assess vulnerabilities, and prioritise those that pose the greatest risk to food security. Such an evidence base is essential to guide government and industry in developing targeted, proportionate strategies to secure Australia's food system for the long term.

Recommendation 6: *The Strategy should include immediate measures to secure access to critical inputs already well understood as essential to Australia's food system, such as fuel, fertilisers, labour, and energy. Action should focus on reducing vulnerabilities, stabilising prices where possible, and ensuring contingency arrangements are in place for high-risk dependencies.*

Recommendation 7: *The Strategy should include a comprehensive audit of critical inputs to Australia's food system, assessing their availability, price stability, and vulnerability to disruption, and categorise them according to their potential impact on national food security (critical, disruptive, or business as usual). This evidence base must inform mitigation strategies, policy interventions, and investment priorities to secure both industry viability and affordable food for Australian consumers.*

4.2 Strengthening Domestic Production and Supply Chains

Australia's food system is fundamentally built on its domestic production base and the supply chains that connect farms to households. Safeguarding this system means ensuring food can be produced sustainably, at scale, and with consistent productivity, while also being delivered to consumers reliably, affordably, and safely in every region of the country.

Australia's domestic production base is under growing strain from broader economic and structural pressures, including rising energy prices, escalating labour costs, and volatility in essential inputs such as fertilisers and packaging. These challenges are explored in other parts of this submission, all of which highlight the interconnected nature of food system resilience. At the core, however, is the need to ensure farming businesses can continue producing with confidence. This requires stable policy settings, a fair-trading environment, affordable access to finance, and enabling infrastructure. Without these foundations, producers face mounting barriers to reinvestment and growth, undermining the sector's capacity to meet domestic demand and contribute to global food security.

Strengthening domestic production also requires a focus on productivity. For agriculture, immediate productivity gains will come less from breakthrough innovation and more from removing the structural handbrakes that constrain producers today. Overly burdensome regulation, duplicative compliance requirements, and barriers to investment continue to weigh on businesses, limiting their ability to scale and remain competitive.

The fresh produce sector is facing a mounting set of regulatory obligations, both government-mandated and market-driven, that impose significant costs without delivering proportional benefits. Poorly designed policies, duplication across jurisdictions, and limited consultation with industry create inefficiencies that erode production, discourage investment, and undermine long-term viability. Combined with the aforementioned challenges (rising input costs), these regulatory pressures are weakening the ability of producers to operate at scale and supply affordable food.

Resilient supply chains are equally critical. Recent crises, including the COVID-19 pandemic, extreme weather events, and global geopolitical tensions, have demonstrated how quickly disruptions can translate into shortages, higher consumer prices, and food waste. Fresh produce is especially vulnerable given the importance of timeliness, cold storage, and efficient logistics. A clear example is the severe and prolonged flooding in early 2025 in North Queensland, which cut the Bruce Highway and other key freight corridors. Trucks carrying bananas and other produce were stranded, leading to shortages at distribution centres and threatening both supply and price stability.

Domestic production and resilient supply chains are inseparable foundations of national food security. Without viable farm businesses, there is no food to distribute; without robust supply chains, food cannot reach consumers reliably or affordably. Enabling producers to operate at their full potential, while investing in the infrastructure that delivers their output, will protect against shocks, keep food prices stable, and sustain Australia's role as a reliable contributor to regional and global food security.

Recommendation 8: *The Strategy should prioritise measures that strengthen the productivity and viability of domestic food production, including reducing regulatory burdens, eliminating duplication across jurisdictions, and addressing barriers to investment. This will enable farmers to operate at their full potential, reinvest in their businesses, and maintain the scale of production required to underpin food security.*

Recommendation 9: *The Strategy should commit to targeted investment in resilient supply chain infrastructure, particularly regional roads, and promote diversification of freight routes.*

4.3 Developing a Productive and Stable Workforce

The resilience of Australia's food system depends on a workforce that is both productive and stable across the entire supply chain. Yet the sector faces persistent challenges in attracting and retaining workers at all skill levels, particularly in regional Australia where housing, transport, and local services are limited.

Shortages affect both skilled and unskilled roles, from technical staff and managers to seasonal harvest workers. Agriculture also competes with industries such as mining, which offer significantly higher wages for comparable skills, for example forklift drivers, and suffers from a lack of awareness among Australians of the diverse career opportunities in the industry.

These challenges were recently echoed in *An Essential Ingredient: The Food Supply Chain Workforce*⁵, a recent report from Jobs and Skills Australia, which identifies key constraints in workforce supply. Among its findings are acute shortages of labour for production, manufacturing, and distribution; inconsistent access to education and training in regional locations; and systemic barriers impacting seasonal work, including accommodation and visa pathways.

Labour is a particularly critical component of the fresh produce sector, which is highly labour-intensive and dependent on peaks of seasonal harvest demand. Approximately 65,000–80,000 full-time equivalent roles are required annually, spread across three areas:

- Harvest Labour – 80% of workforce: harvesting, picking, packing, planting and maintenance (e.g. pruning) of horticultural crops
- Technical Expertise – 15% of workforce: skilled and semi-skilled roles including supervisors, agronomists, food technologists and food safety specialists
- Management & Administration - 5% of workforce: farm managers, sales and marketing, category management, human resources and finance and accounting.

The supply of fresh produce depends entirely on access to harvest labour, which underpins the viability of permanent jobs across the industry. While Australian residents typically fill the skilled (technical, managerial, and administrative) positions, workers from overseas are the main source of harvest workers. The industry's reliance on overseas workers for harvest labour is unlikely to change because the characteristics of harvest work, particularly in today's tight labour market, are unattractive to most Australians. Harvest work is seasonal (temporary), regional, variable (influenced by weather and other factors) and physical demanding. Developing a productive and returning harvest workforce is key to the industry's long-term viability.

Labour also represents, on average, 52% of the total cost of producing fruit and vegetables. Any changes to workforce availability or cost, whether by design or unintended consequences of broader policy, directly affect business viability and consumer prices. Sustaining fresh produce supply and the sector's growth therefore requires a more focused workforce strategy. A dedicated Harvest Work Visa (HWV) offers one part of the solution, by enabling workers to move flexibly between approved employers and regions during harvest periods, return year after year, and work under clear protections and certainty. Beyond the harvest workforce, long-term investment in training and career pathways is needed, accompanied by policies to address regional infrastructure constraints, especially housing shortages, which remain a major barrier to attracting and retaining workers.

Delivering effective workforce solutions will require a whole-of-government approach, recognising that food system labour challenges extend well beyond the agricultural portfolio. Migration policy, skills and training, regional development, housing, and industrial relations all play a role in shaping the availability, cost, and stability of the workforce. Coordinated action between key agencies, including the Departments of Agriculture,

⁵ JSA – [An Essential Ingredient: The Food Supply Chain Workforce](#) – January 2025

Home Affairs, Employment and Workplace Relations, Education, and Infrastructure, will be essential to ensure coherent, practical, and lasting solutions that both support industry and strengthen national food security.

Without such coordinated and sustained action, labour shortages will continue to undermine production, reduce quality, and increase costs, creating instability in food supply and contributing to volatile prices for consumers. By contrast, implementing reliable labour pathways, such as a Harvest Work Visa, investing in skills and training pipelines, and addressing critical enabling infrastructure, like regional housing, will address workforce challenges, protect grower viability, and ensure both the availability and affordability of food for Australian households.

Recommendation 10: *The Strategy should prioritise stabilising the food and agriculture workforce through a coordinated whole-of-government approach and delivering reliable labour pathways, such as a dedicated Harvest Work Visa, investment in training and skills, and targeted support for regional infrastructure such as housing and transport services.*

4.4 Safeguarding Biosecurity

Australia's strong biosecurity system is one of the most important pillars of national food security. It has long protected the nation's agricultural industries from pests and diseases that have devastated production systems overseas. However, the risks of incursions are constantly increasing amid an ever connected and changing environment.

The fresh produce sector is particularly exposed. Horticulture crops are highly vulnerable to exotic pests and diseases that could devastate yields, wipe out production in key growing regions, and cause long-term market instability. Recent detections of pests such as varroa mite in bees and incursions of the Queensland fruit fly in pest free areas illustrate how quickly local production can be disrupted, with cascading impacts across supply chains and export markets. The consequences of a large-scale outbreak in a fresh produce crop would extend well beyond industry losses, significantly reducing domestic food availability, raising consumer prices, and damaging Australia's reputation as a reliable trading partner.

Stronger coordination across jurisdictions is also essential. Responsibilities for biosecurity are spread across federal, state, and territory governments, with industry providing critical delivery functions. A truly national strategy requires consistent standards, clearly defined roles, and investment in preparedness, including simulation exercises, response protocols, and rapid containment capacity, so that when threats arise, they can be managed quickly and effectively.

The benefits of a robust biosecurity system extend well beyond the farm gate. Preventing major incursions protects food availability and affordability for all Australians, safeguards thousands of regional jobs, and ensures the continuity of exports that underpin our industry and prosperity. For these reasons, biosecurity should be recognised in the strategy clearly as a public good: it delivers broad national benefits and must therefore be supported by funding arrangements that reflect this reality, specifically predictable and adequate public funding.

Recommendation 11: *The Strategy should prioritise safeguarding Australia's biosecurity system by embedding it as a national public good. This requires predictable, long-term government funding supported by fair co-investment arrangements, improved capacity, and strengthened cross-jurisdictional coordination.*

4.5 Trade and Market Access

Australia's role as a reliable supplier of safe, high-quality food underpins both its economic prosperity and its contribution to regional food security. Around 70% of national agricultural production is exported, and this not only sustains farm viability but also reinforces the efficiency and scale of domestic supply chains, keeping food available and affordable for Australian households.

For the fresh produce sector, future success and long-term industry resilience are strongly linked to expanding exports. With 97% of fresh produce consumed in Australia grown locally, the domestic market is fully saturated. Industry growth beyond population increases therefore depends on opening new and improving existing export opportunities. Growing exports will help drive productivity and innovation, deliver efficiency gains that reduce costs, and strengthen supply-chain resilience.

Australian produce is highly sought after internationally, yet fresh produce accounts for less than 2% of Australia's \$79.9 billion in agricultural exports (2022–23). This reflects the complexity of market access for horticulture. From a standing start, gaining market access for a fresh produce commodity can take up to and over a decade. This process can, however, be accelerated through sustained investment in scientific and trade negotiation capacity, as well as by elevating horticulture market access in high-level government-to-government engagement, an approach used by competitor nations.

Recent trade work completed by the AFPA has identified 22 priority market access opportunities which, if achieved, could increase the sector's trade value by \$800 million annually (a 50% uplift), generate \$200 million in wider economic benefits, and create more than 650 new jobs. Realising this potential requires stronger resourcing of DAFF's market access science and negotiation capacity, coupled with a whole-of-government approach.

Improving onshore processes is also important. DAFF's export services system is struggling to keep pace with the rapid growth and time-sensitive demands of Australia's horticulture export sector, effectively placing a handbrake on the trade gains achieved to date.

Trade and market access should be treated as a dual priority: growing export opportunities while ensuring that export success strengthens domestic supply. Export earnings drive on-farm reinvestment, innovation, and efficiency, all of which underpin national food security. Equally, resilient logistics infrastructure (e.g. ports, freight channels, and cold chain capacity) is essential to ensure food can move to both domestic and international markets without disruption.

Recommendation 12: *The Strategy should reinforce trade and market access as a central pillar of national food security by:*

- *Expanding and defending access to key export markets, with a particular focus on high-value fresh produce opportunities.*
- *Resourcing DAFF's scientific and trade negotiation capacity to accelerate new market access protocols.*
- *Establishing a coordinated, whole-of-government approach to trade negotiations, leveraging the influence of multiple portfolios.*
- *Investing in efficient, time-sensitive export service systems and resilient logistics infrastructure.*
- *Ensuring that export growth directly supports the productivity and resilience of domestic supply chains, keeping food affordable and available for Australian consumers.*

4.6 Promoting Innovation and Sustainability

Innovation and sustainability are essential to the long-term security and resilience of Australia's food system. While the sector has a strong history of adaptation, the pace of change, driven by climate variability, shifting consumer expectations, technological disruption, and tightening resource constraints, demands a more strategic and coordinated approach. The Strategy must support producers to adopt technologies, practices, and business models that improve efficiency and sustainability while safeguarding competitiveness.

Producers, particularly in the fresh produce sector, are already among the most efficient in the world. Yet sustained innovation requires reducing structural barriers to investment, ensuring fair market conditions, and improving knowledge transfer across the supply chain. The challenge for many growers is not inventing new solutions but scaling and adopting them in a commercially viable way. Practices such as water-use efficiency,

precision agriculture, and protected cropping offer clear opportunities to strengthen productivity and sustainability simultaneously, but uptake is often limited by cost and regulatory burdens.

For sustainability initiatives, a holistic approach is needed. Addressing any one area in isolation risks shifting costs or creating unintended consequences that undermine food production. For instance, emissions reduction initiatives must account for energy costs and their impact on food affordability, while packaging reforms must balance environmental goals with food safety, shelf life, and waste minimisation.

Importantly, innovation and sustainability should be positioned as complementary to productivity and resilience. Rather than fragmented or poorly designed requirements, governments should pursue coordinated, cross-portfolio policies developed in close consultation with industry. Adequate transition pathways must be built in so that environmental objectives reinforce, rather than undermine, national food security.

Recommendation 13: *The Strategy should promote a coordinated, whole-of-system approach to innovation and sustainability that reinforces productivity and resilience. This requires cross-portfolio policy alignment, meaningful industry consultation, and investment in research, development, and adoption pathways. Policies should be designed to reduce costs and risks for producers, ensuring that sustainability objectives strengthen, rather than compromise, the long-term stability of Australia's food supply.*

5. Proposed Approach and Timeline

The AFPA recommends that the National Food Security Strategy adopt a phased and prioritised implementation framework, recognising that not all risks carry the same scale of consequence or urgency. As outlined in Section 3.2, actions should be categorised as:

- **Critical:** systemic risks that, if realised, could severely compromise national food security. These require long-term planning, significant investment, and whole-of-government coordination.
- **Disruptive:** issues that may cause localised or temporary shortages or cost pressures but can be managed with targeted intervention.
- **Business-as-Usual:** ongoing pressures that, while important, represent part of the normal operating environment for producers and supply chains.

Actions that are *business-as-usual* should be addressed in the short term (1–2 years) wherever possible. *Catastrophic* risks, given their complexity, will generally require medium (3–5 years) to long-term (5–10 years) horizons to resolve. Disruptive issues sit between these categories, requiring proportionate investment and coordinated responses.

The table below provides a first draft and example of specific actions across AFPA’s recommended priority areas, risk category and indicative timelines. This table could be expanded to include information on responsible Government Departments and the role, if any, of state and territory government in delivering the action.

Draft Action Table

Priority Area	Issue	Risk Category	Action	Indicative Timeline
4.1 Critical Inputs	Lack of visibility on input dependencies across the food system, including imported and domestic inputs.	Critical (Enabling Action)	Conduct a comprehensive national audit of food system critical inputs (fuel, fertilisers, seed, packaging, energy, etc.) to map vulnerabilities and prioritise resilience measures.	1–2 years
4.1 Critical Inputs	Heavy reliance on imported liquid fuels exposes food production, storage, and transport to catastrophic risk.	Critical	Secure fuel supply contingencies through strategic reserves, diversification of import sources, and investment in alternative fuels.	5–10 years
4.2 Domestic Production & Supply Chains	Duplication of regulation and compliance across jurisdictions imposes unnecessary costs and hampers productivity.	Business-as-Usual (Enabling Action)	Conduct a comprehensive audit of regulatory requirements across jurisdictions, with the intention to streamline and harmonise, reducing duplication, red tape, and barriers to investment.	1–2 years
4.2 Domestic Production & Supply Chains	Vulnerable freight and logistics networks create bottlenecks during shocks such as floods or pandemics.	Disruptive (Enabling Action)	Conduct a comprehensive audit of regional freight corridors and other supply-chain infrastructure, to identify future investments that strengthen the supply chain, including diversifying critical transport routes to improve resilience.	1–2 years

Draft Action Table (cont.)

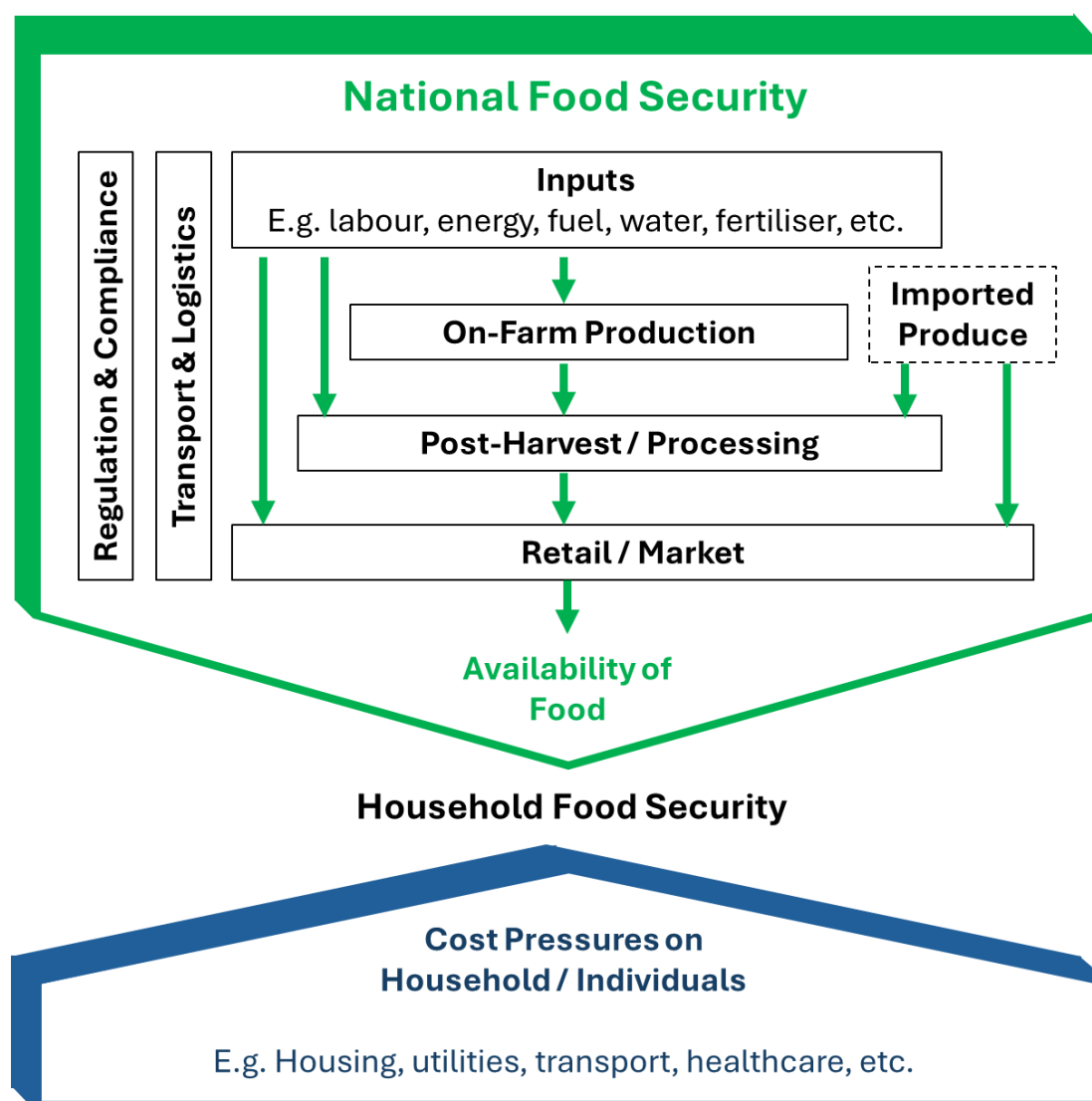
Priority Area	Issue	Risk Category	Action	Indicative Timeline
4.3 Workforce	Ongoing and acute labour shortages, particularly for seasonal harvest work, threaten production viability.	Critical	Establish a dedicated Harvest Work Visa to stabilise the harvest workforce and provide reliable labour pathways.	3–5 years
4.3 Workforce	Lack of affordable housing and local services in regional areas limits workforce attraction and retention.	Business-as-Usual	Co-invest in regional housing, transport, and services to improve the liveability of agricultural regions and support workforce stability.	3–5 years
4.4 Biosecurity	Rising risk of exotic pest and disease incursions with devastating potential impacts on production and trade.	Critical	Increase baseline government funding for biosecurity surveillance, preparedness, and rapid response capacity, recognising biosecurity as a national public good.	3–5 years
4.4 Biosecurity	Lack of nationally consistent response frameworks slows containment when outbreaks occur.	Disruptive	Conduct regular national simulation exercises and strengthen cross-jurisdictional protocols to ensure rapid, coordinated response.	1–2 years
4.5 Trade & Market Access	Slow and under-resourced market access negotiations limit export growth for fresh produce.	Business-as-Usual	Boost DAFF's scientific and trade negotiation capacity to accelerate horticulture market access protocols.	1–2 years
4.5 Trade & Market Access	Horticulture is underrepresented in high-level trade negotiations compared to other commodities.	Business-as-Usual	Elevate horticulture in whole-of-government trade missions and negotiations to secure faster and broader market access outcomes.	1–2 years
4.6 Innovation & Sustainability	Cost and adoption barriers limit the scaling of new technologies and practices that could improve productivity and sustainability.	Business-as-Usual	Increase R&D funding, extension services, and incentives to support adoption of sustainable production systems (precision ag, protected cropping, water-use efficiency).	1–2 years
4.6 Innovation & Sustainability	Poorly designed environmental policies risk creating unintended costs and inefficiencies in the food system.	Business-as-Usual	Prepare whole-of-government policy guidance to ensure environmental reform, including of emissions, packaging, and waste, is holistic and aligned with productivity and food security objectives.	1–2 years

6. Recommendation Summary:

The AFPA recommends that the Strategy:

1. be framed around safeguarding the availability, stability and sustainability of Australia's food supply as the necessary precondition for both national and household food security.
2. adopt a tiered framework to categorise and prioritise risks to the food system as critical, disruptive, or business as usual, ensuring that government responses are proportionate, targeted, and effective.
3. establish strong whole-of-government governance arrangements, led by PM&C, with clear accountability and coordination across portfolios and levels of government, to ensure food security is treated as a national priority. These arrangements must be supported by transparent reporting, mechanisms for industry partnership, and pre-defined crisis coordination protocols.
4. explicitly recognise and support the long-term viability and competitiveness of Australia's agriculture sectors through policy measures that address cost pressure, strengthen producer resilience, and enable continued productivity-enhancing investments.
5. be established on a long-term horizon (20+ years) but be subject to periodic review (e.g. every 3–5 years) to ensure it adapts to new risks, changing circumstances, and evolving national priorities.
6. include immediate measures to secure access to critical inputs already well understood as essential to Australia's food system, such as fuel, fertilisers, labour, and energy. Action should focus on reducing vulnerabilities, stabilising prices where possible, and ensuring contingency arrangements are in place for high-risk dependencies.
7. include a comprehensive audit of critical inputs to Australia's food system, assessing their availability, price stability, and vulnerability to disruption, and categorise them according to their potential impact on national food security (critical, disruptive, or business as usual). This evidence base must inform mitigation strategies, policy interventions, and investment priorities to secure both industry viability and affordable food for Australian consumers.
8. prioritise measures that strengthen the productivity and viability of domestic food production, including reducing regulatory burdens, eliminating duplication across jurisdictions, and addressing barriers to investment. This will enable farmers to operate at their full potential, reinvest in their businesses, and maintain the scale of production required to underpin food security.
9. commit to targeted investment in resilient supply chain infrastructure, particularly regional roads, and promote diversification of freight routes.
10. prioritise stabilising the food and agriculture workforce through a coordinated whole-of-government approach and delivering reliable labour pathways, such as a dedicated Harvest Work Visa, investment in training and skills, and targeted support for regional infrastructure such as housing and transport services.
11. prioritise safeguarding Australia's biosecurity system by embedding it as a national public good. This requires predictable, long-term government funding supported by fair co-investment arrangements, improved capacity, and strengthened cross-jurisdictional coordination.
12. reinforce trade and market access as a central pillar of national food security by:
 - Expanding and defending access to key export markets, with a particular focus on high-value fresh produce opportunities.
 - Resourcing DAFF's scientific and trade negotiation capacity to accelerate new market access protocols.
 - Establishing a coordinated, whole-of-government approach to trade negotiations, leveraging the influence of multiple portfolios.
 - Investing in efficient, time-sensitive export service systems and resilient logistics infrastructure.
 - Ensuring that export growth directly supports the productivity and resilience of domestic supply chains, keeping food affordable and available for Australian consumers.
13. promote a coordinated, whole-of-system approach to innovation and sustainability that reinforces productivity and resilience. This requires cross-portfolio policy alignment, meaningful industry consultation, and investment in research, development, and adoption pathways. Policies should be designed to reduce costs and risks for producers, ensuring that sustainability objectives strengthen, rather than compromise, the long-term stability of Australia's food supply.

Appendix 1: Dependencies and Pressures on Household Food Security



Household food security is dependent on the availability (stability and sustainability) of food in the system and determined by the economic pressures and constraints that shape a household's capacity to obtain it.

Governments at all levels are progressing policies and investments to address cost-of-living challenges that will positively influence household food security. Importantly, many of the inputs essential to food production—such as energy, fuel, and water—are also major drivers of household cost pressures. This overlap highlights the interconnection between the food system and broader economic settings.

The purpose of Australia's National Food Security Strategy should be to ensure the foundations of the food system itself are safeguarded. This means securing critical inputs, enabling productive and viable domestic production, maintaining resilient supply chains, protecting biosecurity, supporting innovation and sustainability, and expanding trade and market access. Together, these actions underpin the availability and stability of food in Australia.

By strengthening domestic production and creating more resilient, efficient supply chains, the Strategy will also help reduce price volatility and improve affordability for consumers. Without a secure and reliable supply of food, affordability measures alone cannot guarantee household food security. By focusing on the system's underlying enablers, the Strategy will complement existing cost-of-living initiatives and ensure Australians continue to have reliable access to safe, nutritious, and affordable food, now and into the future.