



Biosecurity Act 2015 –Biosecurity (Prohibited and Conditionally Non-prohibited Goods) Determination 2016

Cover Sheet

Please complete and submit this form with your submission:

By email: newbiosecuritylegislation@agriculture.gov.au

Or by post: Biosecurity Legislation Implementation Office
Biosecurity Implementation Branch
Australian Government Department of Agriculture
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WAFarmers Grains Section welcomes the opportunity to comment on the proposed implementation of the *Biosecurity (Prohibited and Conditionally Non-prohibited Goods) Determination 2016*.

As background, WAFarmers is the state's largest and most influential rural advocacy and service organisation. WAFarmers represents more than 3,500 Western Australian farmers from primary industries, including grain growers, meat and wool producers, horticulturalists, dairy farmers, commercial egg producers and beekeepers.

WAFarmers Grains Section is concerned about the proposed legislation and the impact on the wider agricultural sector. There is limited information about how the proposed legislation will work with the current restrictions imposed within Western Australia. The implementation of the federal legislation will not adequately protect or acknowledge Western Australia's unique restrictions. This may lead to significant environmental and economic consequences on the productivity and overall viability of the agriculture sector of Western Australia. WAFarmers requests additional information and the opportunity to adequately assess the information before the WA import requirements be amended.

WAFarmers requests clarification on how the proposed *Biosecurity Act 2015* will interact with the existing *Biosecurity and Agricultural Management Act 2007*, and the existing Quarantine WA Import Requirements. The additional information WAFarmers requests is based around how the Federal *Biosecurity Act 2015* will honour Western Australia's agriculturally unique biosecurity position, particularly through enforcing, protecting and further enhancing WA's biosecurity regulations.

WAFarmers Grains Section acknowledges that standardised biosecurity regulations are essential for a viable trade future; however, the agricultural sector of Western Australia is unique when compared to the Eastern States, and therefore allowances must be made to ensure the protection for industry.

WAFarmers requests that existing restrictions on importation of agricultural goods and products into Western Australia remain until all sectors of affected industries have had an opportunity to assess how the changes to the Federal Legislation are honouring state-specific restrictions. The retention of interstate restrictions is welcome, as Western Australia has strict border control.

Any changes to biosecurity standards in Western Australia must be supported by all sectors of industry that would potentially be affected, and WAFarmers does not consider the current level of consultation and information to be adequate to ensure all concerns have been addressed. Failing to address these concerns before they are implemented may pose a significant threat to the agricultural sector and would be a significant oversight in the State and Federal Governments obligations to protect the environment and the economy.

Western Australia has a number of prohibited seeds, which according to the Department of Agriculture and Food¹, is 940, with an additional 127 seed types currently banned to stop the spread of the Myrtle rust environmental disease. These restrictions are enforced by Quarantine WA, and additional information is available through the Western Australia Organism List.

WAFarmers notes that the BICON database as it currently stands has approximately 20,000 plants, animals, minerals, and biological products. However, the Western Australian Organism List has 55,609² organisms listed. WAFarmers is concerned that there is a significant number

difference between the state and federal lists, which may lead to issues within the Western Australian economy which may lead to flow on effects with our export markets.

WAFarmers does not consider the 16 June 2016 deadline to be reasonable, as there is significant misinformation and confusion currently within the Western Australian apiary, grains and horticultural industries. The proposed legislative changes that would remove protections for WA should be amended to ensure industry concerns have been adequately addressed. There is significant work required to ensure the legislation does not cause financial and economic damage to the agricultural sector of Western Australia.

WAFarmers does not consider the current level of engagement with affected sectors to be sufficient to support the legislation. WAFarmers requests an extension of time and a hold on the implementation of the *Biosecurity Act 2015* until such a time that all biosecurity threats have been adequately addressed.

WAFarmers Grains Section hopes you look upon the comments favourably, and amend the legislation to ensure it adequately protects our industry and the wider agricultural sector.

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1. "Importing seed to Western Australia", Department of Agriculture and Food, <https://www.agric.wa.gov.au/importing-plant-and-plant-products/importing-seed-western-australia>
 2. "Western Australian Organism List", Department of Agriculture and Food, <https://www.agric.wa.gov.au/organisms>
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