

13 October 2023

Mr Adam Fenessy  
Secretary  
Department of Agriculture, Fisheries and Forestry  
Agriculture House  
CANBERRA ACT 2601



By email: [secretariatbsf@aff.gov.au](mailto:secretariatbsf@aff.gov.au)

Dear Mr Fenessy,

**RE: Submission on the consultation for the proposed Biosecurity Protection Levy**

The Victorian Farmers Federation (VFF) appreciates the opportunity to provide this submission to the Department of Agriculture, Fisheries and Forestry (DAFF) regarding the Commonwealth Government's proposed Biosecurity Protection Levy. As the representative voice of Victorian farmers, the VFF supports strengthening Australia's biosecurity system in a transparent, accountable, and sustainable way.

The VFF recognises that biosecurity is a shared responsibility that requires commitment from multiple stakeholders including government, industry and the community. However, it is important to note that the agriculture industry is already significantly invested in maintaining biosecurity through both industry and government lead programs, as well as independent actions on-farm. As such, any additional financial burden should be carefully considered in the context of these existing activities.

Our agricultural industries and farming communities are both beneficiaries and vulnerable parties in relation to effective biosecurity measures. Hence, the introduction of the proposed levy has raised important questions among our members.

An effective levy proposal must clearly outline fund allocation, specify intended outcomes, and provide measurable metrics to assess the impact of any revenue increases. These elements are crucial to ensuring that stakeholders have a full understanding of how additional funds will be allocated, what specific benefits are expected from the increased funding, and whether these resources are targeting the most critical biosecurity protection needs.

An extensive breakdown of the biosecurity protection-related expenses that the levy is intended to offset is essential to a comprehensive analysis of this initiative. Furthermore, understanding how funds are currently being allocated is fundamental for a thorough assessment of the proposal's impact.

The VFF believes that any biosecurity levy must operate under an industry-led framework. The proposed contribution does not align with the Commonwealth Government's 12 levy principles, which establish the rights of farmers to have their say over how their levy contributions are used, that all collected funds must be explicitly allocated for specific uses and offer evident benefits to those contributors. Given that the raised funds would be channelled into consolidated revenue, with no guarantees for the hypothecation of funds and no allowance for industry-specific allocation, the government's proposal bears a closer resemblance to a tax rather than a levy.

Moreover, the VFF notes that levy contributions across different commodities and industries vary, with some forms of production paying vastly different types of levies and some not subject to a levy at all. Levies across commodity types are not benchmarked, and doing so would require extraordinary effort. The creation of a system for the whole agricultural industry to contribute to biosecurity funding that is based on existing levy arrangements is therefore deeply problematic, given there can be no guarantee for it being fair and equitable.

In addition, the proposed levy does not have any cap. As existing levies are based on production volume and values, increased production would increase the financial contribution of the agricultural sector beyond the level which the Commonwealth has deemed to be fair. The absence of a sunset clause also raises significant concerns. This would provide stakeholders with assurance that the fee is not open-ended and subject to future increases or changes to its stated purpose.

The lack of a Regulatory Impact Statement (RIS) also warrants immediate attention for the sake of full transparency and understanding of the consequences for the cost of production.

Therefore, given the previously outlined concerns—including the misalignment with existing financial contributions from the agriculture sector, the absence of a detailed plan for fund allocation and industry-specific outcomes, as well as inadequate safeguards concerning the levy collection timeframe and potential for future increases—the VFF is strongly opposed to implementing the proposed Biosecurity Protection Levy.

Were the Commonwealth to remain intent on seeking the agricultural sector to make an additional financial contribution to biosecurity protection, then it is incumbent on the government to propose a different model that is fair and equitable for all farmers and is not based on existing levy contributions.

Acknowledging the existing financial contributions of the agriculture sector to biosecurity is paramount. We strongly caution against the imposition of any additional economic burden that could undermine the sustainability and competitiveness of our sector and farmers' livelihoods.

To ensure that financial duty is placed where it can most effectively contribute to risk mitigation, new levies or taxes must target exclusively those who create biosecurity risks. As a pragmatic first step, we advocate for the immediate introduction of the container levy previously discussed, to manage the responsibility and accountability in the Australian biosecurity system more equitably.

We appreciate the opportunity to contribute feedback during this consultation phase. Given the profound implications for Victorian farmers, we are keen to remain actively involved in these discussions. It is of utmost importance that the concerns of our farming community are addressed in a thorough and comprehensive manner.

The VFF welcomes the opportunity to provide further feedback. Please contact VFF Senior Policy Advisor, Sue Viana, at [policyteam@vff.org.au](mailto:policyteam@vff.org.au) who can assist in facilitating further discussion.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Emma'.

**Emma Germano**  
President  
Victorian Farmers Federation