

Date: 11th June 2026

Biosecurity Strategy and Reform Division
Department of Agriculture, Fisheries & Forestry
Parliament House
Canberra ACT 2600

Via Email: biosecurityreform@aff.gov.au

Lodged on [have-your-say](#)

To the Secretariat – Biosecurity Strategy and Reform Division

RE: GTA Submission – National Biosecurity Strategy Reform Agenda

1. Introduction

Grain Trade Australia (GTA) welcomes the opportunity to provide feedback on the National Biosecurity Strategy Reform Agenda Discussion Paper.

GTA supports a strong national biosecurity system that protects Australian agriculture, the environment and market access. Effective biosecurity is essential to maintaining the productivity and competitiveness of Australia's grain industry and the broader agricultural sector.

However, biosecurity measures must remain science-based, risk-based and proportionate. The national biosecurity system should be efficient and manage risk while supporting efficient trade, supply chain resilience and access to essential agricultural inputs.

GTA supports continuous improvement of Australia's biosecurity system but is concerned that many of the reforms proposed in the discussion paper focus on additional frameworks, governance arrangements, planning processes and funding mechanisms rather than **practical improvements** to regulatory efficiency, decision-making and risk management outcomes.

2. Key Principles

GTA recommends that all proposed reforms be assessed against the following principles:

- Improve regulatory efficiency and timeliness and deliver measurable biosecurity outcomes.
- Be proportionate to identified risk.
- Avoid unnecessary regulatory burden and compliance costs.
- Support domestic and international trade.
- Maintain supply chain resilience.
- Demonstrate value before imposing additional costs on industry.

3. Regulation and Trade

GTA strongly supports reforms that reduce regulatory complexity and improve consistency across jurisdictions.

The discussion paper appropriately identifies regulatory inconsistency as a constraint on domestic trade. However, regulatory reform should also focus on improving the efficiency, transparency and timeliness of biosecurity decision-making.

GTA is currently working with government on the review of import conditions for whole grain and plant-based protein meals. This process highlights the challenges that can arise when regulatory systems become overly complex and lengthy.

Access to imported grain and protein meals can become critically important during drought periods and domestic supply shortages. While biosecurity risks must continue to be appropriately managed, approval processes should be risk-based, transparent and completed within reasonable timeframes.

4. Traceability

GTA does not support the development of a national traceability system for plant products without a clear demonstration of need, benefit and proportionality.

The rationale presented in the discussion paper appears largely based on traceability models used in livestock industries. Grain supply chains differ fundamentally from livestock production systems and have a much lower risk profile.

Bulk grain for export and domestic use is routinely aggregated, blended, transferred and stored through commercial supply chains. Product identity is commonly lost through these normal commercial processes, in much the same way as milk is aggregated from multiple producers before processing.

The grain industry already operates within established quality assurance, receipt, storage, transport and market access systems that provide an appropriate level of traceability relative to the risk profile of grain commodities.

Before any national plant traceability system is progressed, government should undertake a comprehensive cost-benefit assessment, demonstrate the specific biosecurity outcomes that cannot be achieved through existing systems and fully assess the implementation costs that would be imposed on industry.

5. Funding

GTA notes that funding reform is a significant focus of the discussion paper.

While the paper acknowledges that biosecurity risks are increasing, it places considerable emphasis on identifying alternative funding mechanisms and potential changes to cost-sharing arrangements.

GTA considers that the priority should be improving the effectiveness and efficiency of existing arrangements before seeking additional funding from industry.

Agricultural industries are already facing increasing regulatory, compliance and supply chain costs. Recent decisions to impose additional charges associated with access to secure port areas is an example of the cumulative cost pressures being placed on grain exporters and supply chain participants.

Any proposal to increase industry contributions to biosecurity funding must be supported by:

- A demonstrated need.
- Transparent governance arrangements.
- Clear accountability.
- Measurable performance outcomes.
- Equitable allocation of costs relative to risk and benefit.

Industry should not be viewed as a default source of additional funding for government biosecurity activities.

6. Operational Capability

GTA supports initiatives that strengthen preparedness, surveillance and response capability.

However, the discussion paper contains a significant focus on strategies, frameworks, assessments, governance arrangements and data-sharing mechanisms.

The effectiveness of the biosecurity system should be measured by **operational outcomes** rather than the number of plans or governance structures established.

Priority should be given to initiatives that improve detection, response capability, information sharing, decision-making and regulatory efficiency.

Where additional data collection or reporting obligations are proposed, government should demonstrate a clear operational benefit and minimise impacts on commercial participants.

7. Essential Biosecurity Tools

Regulatory burden must be considered and must be appropriate across all areas of Government. GTA in a recent submission highlighted that proposed revisions to Safe Work Australia Workplace Exposure Limits (WELs) for fumigants (including methyl bromide) may impact on supply chain efficiency. It is understood these new WELs may significantly increase the required exclusion zones for fumigation activities.

Methyl bromide remains a critical phytosanitary and biosecurity treatment tool supporting Australian grain exports and international market access.

Any regulatory changes that reduce the ability of ports, container terminals and fumigation providers to undertake treatments in metropolitan or port precinct locations could have significant impacts on both import and export supply chains including Australia's ability to meet importing country requirements.

The National Biosecurity Strategy should recognise the importance of maintaining practical access to critical biosecurity treatment technologies and ensuring that regulatory decisions made by other agencies do not unintentionally undermine biosecurity and trade objectives.

8. Industry Engagement

The agricultural import and export sectors are complex and multi layered. GTA strongly supports ongoing and meaningful industry engagement as a core principle of biosecurity policy development and implementation.

The grain industry operates within a complex supply chain that encompasses production, storage, transport, processing, domestic trade and consumption and international trade. No single organisation or government agency can fully understand the operational impacts of proposed reforms across all sectors.

Continuous engagement with industry stakeholders is therefore essential to ensure policy settings remain practical, risk-based and informed by real-world experience. Effective consultation should occur throughout the policy cycle, not solely during formal submission processes, to support better decision-making and more effective biosecurity outcomes.

8. Conclusion

GTA supports the continued strengthening of Australia's biosecurity system.

However, future reforms must remain focused on delivering practical outcomes rather than expanding administrative processes. A successful biosecurity system is one that effectively engages with industry, manages risk while supporting trade, maintaining supply chain resilience and preserving the international competitiveness of Australian agriculture.

GTA encourages governments to ensure that all proposed reforms are evidence-based, proportionate to risk and subject to rigorous assessment of both costs and benefits before implementation.

Please do not hesitate to contact GTA at any time.

Yours sincerely,

A handwritten signature in black ink, appearing to read "P O'Shannassy". The signature is written in a cursive style with a long horizontal stroke at the end.

Pat O'Shannassy
CEO, Grain Trade Australia