

National  
Farmers  
Federation

# National Biosecurity Reforms

June 2026



## The National Farmers' Federation (NFF) is the voice of Australian farmers

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF represents Australian agriculture on national and foreign policy issues including workplace relations, trade, and natural resource management. Our members complement this work through the delivery of direct 'grass roots' member services as well as state-based policy and commodity-specific interests.

### NFF Member Organisations



## Contents

<b>The National Farmers' Federation (NFF) is the voice of Australian farmers .....</b>	<b>2</b>
<b>NFF Member Organisations .....</b>	<b>2</b>
<b>Executive Summary .....</b>	<b>4</b>
<b>Recommendations.....</b>	<b>4</b>
<b>The National Biosecurity Strategy.....</b>	<b>5</b>
<b>General response to national biosecurity reforms .....</b>	<b>5</b>
Importance of an outcome-first approach.....	5
Alignment with existing NBS structures.....	6
1.1 Do the proposed reform themes adequately address the strategic risks? .....	7
1.2 How should the reform themes be prioritised/sequenced and why? .....	8
1.4 What opportunities exist to leverage partnerships for better outcomes? .....	8
1.5 Are there any significant barriers or risks that could limit the effectiveness of these proposed reforms? .....	8
<b>Preparedness .....</b>	<b>9</b>
<b>Response .....</b>	<b>9</b>
<b>Recovery.....</b>	<b>10</b>
<b>Workforce Capability and Capacity.....</b>	<b>10</b>
<b>Operational Capability and Capacity.....</b>	<b>10</b>
<b>Legislation and Regulation .....</b>	<b>10</b>
<b>Funding.....</b>	<b>11</b>
<b>Conclusion.....</b>	<b>12</b>

## Executive Summary

The National Farmers' Federation (NFF) welcomes the opportunity to provide feedback to the Department of Agriculture, Fisheries and Forestry (the Department) on proposed national biosecurity reforms and their intersection with the National Biosecurity Strategy (NBS, Strategy).

Australia's biosecurity system is fundamental to the success of our agriculture industries, to the health of our natural environment and to our society and economy at large. However, challenges such as climate change and increased global trade and passenger movements pose an ever-greater threat to Australia's biosecurity. Ensuring Australia's biosecurity system is innovative, adequately resourced and operating efficiently is critical and should be a shared priority for governments, industry, and the broader community.

Farmers are stewards of over half of Australia's landmass, and the industry plays a major role in the national biosecurity system, from on-farm activities to research, development and extension (RD&E), as well as in responding to biosecurity incursions. These industry efforts deliver great public benefit beyond the farm gate.

The NFF strongly supports the National Biosecurity Strategy as a framework to align priorities and actions to strengthen Australia's biosecurity system.

The proposed reform agenda presents a range of initiatives that, if delivered fully and effectively, may result in meaningful improvements to Australia's biosecurity system. Additional reforms should be considered, while cross-thematic issues better

## Recommendations

The NFF makes the following recommendations:

1. Ensure proposed reforms are based on delivering meaningful outcomes backed by measurable goals, with robust monitoring and evaluation frameworks
2. Provide greater clarity as to how proposed reforms align with existing NBS structures such as priority areas and action plans and clarify roles and responsibilities for implementation
3. Embed social licence throughout the reform agenda as per the existing NBS priority area
4. Deliver more consistent, transparent, and adequately-resourced compliance and enforcement to support preparedness and response
5. Ensure preparedness reforms include a priority on prevention
6. Deliver improved risk analyses of different pests, weeds, and diseases to fully account for costs of responses, non-responses or non-eradication, to inform decision-making
7. Ensure recovery mechanisms include industry support during containment or management
8. Ensure research is embedded as a cross-thematic priority over the biosecurity continuum
9. Ensure funding reforms follow best-practice policy development, fully assess alternative models, reflect extensive existing literature, and accurately account for industry's contribution to biosecurity funding and expenditure.

## The National Biosecurity Strategy

The NFF welcomed the release of the National Biosecurity Strategy (NBS, Strategy) in August 2022. The development of such a strategy was a long-held priority ask of the NFF, as well as environmental groups and the wider community.

The NBS is critical in demonstrating the central role biosecurity plays in the success of the agricultural sector and community-at-large, providing the guiding framework for preparedness, response efforts, and outlining the roles and responsibilities of those within the biosecurity system.

Importantly, the Strategy received support from all governments, as well as industry and the broader community.

The NFF has participated extensively in the development and ongoing revision and implementation of the Strategy. This includes through participation in the References Group, multiple public consultation processes, and current representation on the Implementation Committee (NIC) – in addition to related initiatives such as the Sustainable Biosecurity Funding Advisory Panel and National Biosecurity Forum.

The NFF continues to strongly support the National Biosecurity Strategy as providing the agreed guiding framework for the biosecurity system.

## General response to national biosecurity reforms

### Importance of an outcome-first approach

The NFF believes that any reforms to the National Biosecurity Strategy must deliver measurable improvements to Australia's biosecurity system.

Reforms – short, medium, and long term – must be designed around meaningful goals supporting clear outcomes. This must be backed by improved transparency, robust monitoring and evaluation frameworks, and reporting such as the required NBS annual report and strategy review.

The NFF notes that the 2022-2032 NBS included a commitment to a formal strategy review in 2027, yet recent framing has proposed the current reform process will include only a 'light-touch' internal review by NBC. The Implementation Plan states: "baseline data about the current state of Australia's biosecurity system against the priority areas will need to be collected." The NFF firmly believes the formal review should provide detailed data, against baseline data, to measure the status of NBS implementation to date, and that this should guide future Action Plans and reform priorities. Evidence-based evaluation can enhance social licence and confidence in Australia's biosecurity system, and is in sharp contrast with the concerning situation whereby numerous reviews and reports, such as from Inspectors-General of Biosecurity and independent reviews into the Intergovernmental Agreement on Biosecurity (IGAB), have had reform recommendations left unfulfilled, partially completed, with extremely limited transparency.

A lack of quantitative data benchmarking the performance of Australia's biosecurity system remains a key barrier to understanding the value of proposed reforms or the

effectiveness of actual initiatives. Performance statistics around interceptions, diagnostic testing, staffing, operational metrics, KPIs, combined with data around the costs of (actual or potential) incursions, could provide a more accurate picture of the current state of Australia's biosecurity system and better inform all parties. The NFF welcomes proposed reform initiatives to improve, where appropriate, data sharing and transparency, but believes a greater focus on this – across all themes – is necessary.

Recommendation:

1. Ensure proposed reforms are based on delivering meaningful outcomes backed by measurable goals, with robust monitoring and evaluation frameworks.

## **Alignment with existing NBS structures**

The NFF is concerned that the proposed reforms lack clarity as to how they align – or otherwise – with the NBS structure.

Firstly, there has been no indication as to whether the proposed suite of reforms will be implemented through the development of NBS frameworks such as implementation or action plans.

Secondly, there is a lack of alignment between the proposed reforms and the six agreed NBS priority areas.

For example, priority area one of the NBS is 'shared biosecurity culture'. However, this is not deemed one of the six themes of the proposed reforms. The Discussion Paper notes that Australian Agriculture Ministers deem social licence as one of six key strategic risks to our biosecurity system, stating: "community expectations and maintaining trust and confidence amongst affected producers, representative bodies, the broader community and within governments is important." Despite this, none of the proposed reforms directly address social licence or a shared biosecurity culture.

Similarly, the NBS covers a much broader range of topics than the proposed reform themes. Support for the reform themes – or for the initiatives proposed within those themes – does not remove the requirement of all parties to pursue the priorities outlined within the NBS. The NFF is deeply concerned that agreed priorities of the NBS may be deprioritised, or activities towards those priorities not pursued, due to focusing only on the proposed reforms.

While the proposed reforms may be deemed by governments to be the highest priority for pursuing the goals of the NBS – or address most of the strategic risks highlighted by agriculture ministers – the NFF believes that no agreed NBS priority should be ignored, deprioritised, or discontinued without further consultation. To move away from agreed decadal priorities or the actions agreed in the subsequent NBS Implementation Plan and Action Plan risks weakening Australia's biosecurity system and exposing Australia to the agreed strategic risks. This includes, for example, the initial action stated in the NBS Implementation Plan to "Strengthen understanding of antimicrobial and pesticide resistance and zoonotic pathways".

Further, the NFF believes implementation and prioritisation of reforms should also align with industry-specific biosecurity plans, such as the Biosecurity Plan for the Australian Grains Industry, to better leverage existing or planned activities and resources. It must be acknowledged that Australia's biosecurity system is often delivered through existing

industry systems and regional networks –with RDCs, farming groups and representative organisations all playing a key role in preparedness, communication, and response. These groups and pathways should be leveraged, particularly as a valuable interface with growers that cannot easily be replaced or duplicated by government.

The NFF strongly recommends that the Department provide clear plans for the implementation of reforms in alignment with existing NBS frameworks, including aligning proposed reforms with agreed priority areas. Greater clarity around roles, responsibilities, and delivery mechanisms for implementation is also needed. This is especially important given the disconnect – real or perceived – between Commonwealth and state governments, with accountability and responsibility for key areas often opaque and unclear. Transparency and accountability around coordination mechanisms would strengthen implementation by reducing duplication of effort and limiting gaps in reform processes.

Recommendation:

2. Provide greater clarity as to how proposed reforms align with existing NBS structures such as priority areas and action plans, and clarify roles and responsibilities for implementation.

### **1.1 Do the proposed reform themes adequately address the strategic risks?**

The NFF believes the proposed reform themes could, if properly delivered, assist in addressing the strategic risks.

However, we are concerned at a failure to prioritise social licence, particularly in relation to the trust in government of producers and the agriculture industry. Successful delivery of the reforms proposed could bolster social licence. Equally, failure to deliver meaningful outcomes on the ground – again backed by measurable goals and improvements – could erode agriculture’s trust in the biosecurity system. The ineffective response to Red Imported Fire Ant highlights this risk. Social licence is therefore inextricably linked both to the function of the biosecurity system and the risks of incursion, including health and social impacts.

The NFF is also concerned at a failure to target improved compliance and enforcement activities, which applies to both the preparedness and response themes. Compliance and enforcement activities must be consistent, transparent, and adequately-resourced across jurisdictions.

This is in line with concerns raised by the previous Inspector-General of Biosecurity and the NFF Biosecurity Policy which states: “Regulatory compliance and enforcement tools, including civil penalties, criminal sanctions and visa cancellations, should be used appropriately by governments to manage biosecurity risk and encourage compliance with biosecurity requirements.” A greater emphasis on the enforcement of biosecurity obligations should be included in the reform agenda.

Recommendations:

3. Embed social licence throughout the reform agenda as per the existing NBS priority area.
4. Deliver more consistent, transparent, and adequately-resourced compliance and enforcement to support preparedness and response.

## **1.2 How should the reform themes be prioritised/sequenced and why?**

The NFF believes that funding is fundamental to the successful delivery of all other reforms. It is broadly recognised that the biosecurity system is under increasing strain due to rising costs amid funding constraints. Without adequate funding, including public funding, no other reform can deliver on its full potential. Additional notes on funding are below.

## **1.4 What opportunities exist to leverage partnerships for better outcomes?**

The NFF is concerned that the reform agenda fails to account for the role of other bodies in progressing key aspects of these initiatives, including Plant Health Australia and Animal Health Australia. Greater clarity over how such reforms would be implemented, including the roles and responsibilities of governments and these bodies as well as industry, is required. The NFF believes existing industry delivery systems should be supported and utilised to deliver biosecurity enhancements in a genuine partnership approach. This should include greater support for, and a more substantial focus on, practical on-farm implementation.

The NFF further believes that, particularly in the realm of environmental biosecurity, further work must be done to ensure all relevant stakeholders are engaged in the biosecurity framework and leadership, with clear roles and responsibilities. This especially includes environmental departments of all jurisdictions.

This is in line with the following NBS initial actions:

- *Review governance arrangements to ensure they include relevant stakeholders*
- *Strengthen the involvement of environmental agencies and environmental and community groups.*

The NFF also believes that data sharing, across the reform themes, is a key opportunity to strengthen collaboration between industry and government. This can strengthen transparency and coordination, but reform initiatives must consider producer and industry access to data, ownership and governance arrangements, and usability of systems at the farm level.

## **1.5 Are there any significant barriers or risks that could limit the effectiveness of these proposed reforms?**

The NFF identifies key risks throughout this submission. These include:

- Social licence, including deterioration of industry faith and participation in the reform agenda. This risk is exacerbated by the near-constant cycle of short-term reform agendas without meaningful improvement toward measurable goals, reviews without reforms being fully implemented, and stakeholder fatigue due to repeated consultation on similar themes.
- Lack of alignment with existing NBS structures and implementation pathways, and a failure to clarify delivery mechanisms, roles and responsibilities.
- Lack of coordination between governments, industry, and other stakeholders including PHA, AHA, and environmental bodies.
- Lack of an outcomes-based approach with clear metrics for success.
- Resourcing constraints.

## Preparedness

The NFF believes greater focus should be given to prevention, notwithstanding that is primarily a matter for the Australian Government and the proposed reforms are cross-jurisdictional. Prevention of incursions, wherever possible, is a marker of the strength and success of Australia's biosecurity system. Prevention should be enshrined as a core priority of the reform agenda to better reflect its ultimate importance in reducing long-term costs to agriculture, the environment, and Australian society.

This is in line with the NFF Biosecurity Policy, which states: "Management of biosecurity risk at the border and pre-border, where the economic returns are greatest, should be a priority for governments."

The NFF also supports proposed reforms around traceability, which could strengthen the system across both preparedness and response themes. The NFF urges consideration of NFF members' submissions regarding prioritisation of plant traceability.

Recommendation:

5. Ensure preparedness reforms include a priority on prevention.

## Response

The NFF supports efforts to address well-understood problems with existing emergency response arrangements, regarding funding, gaps, flexibility and scope. In response to funding, it is notable that activities including preparedness, surveillance, containment, and management are not subject to existing deed arrangements and are managed on an ad-hoc basis. Delivering clarity and consistency in response arrangements would provide greater certainty to all parties. This national harmonisation should include funding arrangements, clear decision-making frameworks and pathways – especially for decisions around transition to management, and accountability and review mechanisms.

Environmental response arrangements also suffer from a failure of adequate funding from appropriate sources, including environmental departments across departments. The NFF is concerned that industry funding is therefore effectively cross-subsidising environmental biosecurity capability. As discussed later, any funding reform should properly reflect industry's existing contribution and avoid unfair cost-shifting.

The NFF strongly supports reforms to strengthen surveillance and data-sharing. Improved surveillance and threat assessment system must be risk- and evidence-based to focus on highest priority threats, supported by clear governance frameworks for data collection, sharing and use, and developed in partnership with industry.

Response efforts and arrangements should be based on evidence around risks and costs, including of responses and also potential costs of not responding – or failing to eradicate. Comprehensive risk analysis and counterfactuals should be undertaken and updated regularly.

Recommendation:

6. Deliver improved risk analyses of different pests, weeds, and diseases to fully account for costs of responses, non-responses or non-eradication, to inform decision-making.

## Recovery

The NFF supports efforts to provide improved support for recovery following a biosecurity incursion. However, the NFF is deeply concerned that the proposals do not address a chief issue, being transition to management arrangements and the costly ongoing impacts borne by industry during a containment and management phase. We note this is mentioned in the proposed medium-term reforms around response but is not fully addressed. Greater support for industry during containment or management – not just ‘recovery’ – is vital. However, expanding emergency response arrangements, especially where eradication is not feasible, would be a significant policy shift and would require extensive industry consultation.

Recommendation:

7. Ensure recovery mechanisms include industry support during containment or management.

## Workforce Capability and Capacity

The NFF supports a strong focus on this area. Maintaining a strong biosecurity workforce is fundamental to the ongoing protection of Australia and agriculture from invasive pests, weeds and diseases. A biosecurity workforce strategy, and any initiatives therein, should include the full breadth of the biosecurity workforce, including on-farm and research. It should also account for geographic considerations – recognising the significant constraints on regional workforce currently limiting biosecurity systems in some jurisdictions.

The NFF is particularly concerned with a lack of surge workforce capacity to respond to incursions, especially in the case of concurrent or large-scale incursions. We note that multiple RDCs have considered industry-specific workforce and capability gaps. Addressing this requires a collaborative approach across industry, research organisations, and government.

## Operational Capability and Capacity

The NFF supports this theme as crucial to managing the agreed strategic risks.

However, the NFF is concerned at research and innovation being pigeonholed within this area, rather than deemed as a cross-cutting theme of its own. The NFF supports efforts to better share research and avoid duplication, as well as accelerate research adoption – including of the vast body of RD&E done by the Research and Development Corporations (RDCs). However, it is vital that research and innovation is embedded as a priority across all reform areas, particularly those which deal with the biosecurity continuum (in this case, preparedness, response, and recovery).

Reforms must also be designed to deliver operational capability and capacity across the entire country, including in dispersed regions where access to diagnostics and services are severely limited.

Recommendation:

8. Ensure research is embedded as a cross-thematic priority over the biosecurity continuum.

## Legislation and Regulation

The NFF supports the removal of barriers that unnecessarily hamper domestic trade without delivering clear biosecurity benefits, and supports efforts to improve the efficiency of the regulatory environment. Regulatory burden due to duplication and inconsistency pose a key challenge to producers. The NFF supports efforts to uplift domestic systems and processes to promote domestic market access, noting the current use of inefficient paper-based systems. A focus on national consistency and harmonisation on key matters, enacted through industry consultation, would be supported.

However, the NFF stresses that any regulatory reforms must not undermine the biosecurity system.

## Funding

The NFF has long held that Australia's biosecurity system is insufficiently funded at all levels and yet will be placed under greater stress as climate change and globalisation increase the likelihood of more frequent, complex and severe incursions. We welcome agriculture ministers' recognition of this worrying situation through the agreed strategic risks. Funding constraints impede governments' abilities to effectively implement their obligations, and to ensure Australia's biosecurity system is functioning as required.

The NFF supports the 'Assessment of alternative national funding mechanisms' and believes any changes to existing funding arrangements must follow best-practice policy development, including independent analysis of options and meaningful co-design with stakeholders. Funding models should be evidence-based and linked to increased transparency, performance metrics, and reporting. Increased funding must deliver improved outcomes and strengthen Australia's biosecurity system and performance.

This assessment process must consider the findings of multiple relevant reviews into biosecurity funding in Australia, including the 2017 Intergovernmental Agreement on Biosecurity Review final report *Priorities for Australia's biosecurity system* as led by Dr Wendy Craik; the Productivity Commission's 2023 report *Towards Levvathan? Industry levies in Australia*; and the 2023 Frontier Economics report for the Invasive Species Council *Sustainable funding for biosecurity – an evaluation of funding options*.

Alternative funding models, such as a Biosecurity Future Fund as proposed by NFF member Australian Dairy Farmers (ADF), should also be assessed, as should other examples of biosecurity cost-sharing agreements that deliver effective funding for readiness activities, including New Zealand's Government Industry Agreement for Biosecurity Readiness and Response (GIA).

The NFF also strongly believes that risk-creators, particularly importers, must provide funding at a level proportionate to those risks and not benefit unfairly from funding provided by other parties including industry. This must be enshrined as a key foundation of the future sustainable funding of Australia's biosecurity system.

As noted earlier in the submission, the NFF believes it is vital that all relevant environmental biosecurity stakeholders are engaged in the biosecurity framework and leadership, with clear roles and responsibilities. This must also extend to contributing funding across the biosecurity continuum and thereby ensuring industry is not cross-subsidising environmental biosecurity efforts.

The NFF also reiterates its long-running concern at the failure to properly quantify industry's contribution to biosecurity, in terms of on-farm activities, RD&E, throughout the

supply chain, as well as in response activities and in containment and management. To fully inform any funding discussion, it is imperative to understand the existing financial contribution made by industry.

9. Ensure funding reforms follow best-practice policy development, fully assess alternative models, reflect extensive existing literature, and accurately account for industry's contribution to biosecurity funding and expenditure.

## Conclusion

The NFF appreciates the opportunity to provide feedback on proposed national biosecurity reforms and the ongoing functions and goals of the National Biosecurity Strategy.

The reforms appear largely sound but must deliver meaningful and measurable outcomes to strengthen Australia's biosecurity system and address increasing strategic risks.

The NFF looks forward to continuing to contribute to the ongoing development of this reform agenda and future initiatives under the NBS.

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