

Submission to the National Biosecurity Reform Agenda Discussion Paper

WOOLPRODUCERS
AUSTRALIA

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National Biosecurity Committee Secretariat
Department of Agriculture, Fisheries and Forestry
GPO Box 858
CANBERRA ACT 2601
Via email: biosecurityreform@aff.gov.au and online submission

RE: National biosecurity reform agenda discussion paper

Dear Committee Secretariat,

WoolProducers Australia (WoolProducers) welcomes the opportunity to provide feedback on the national biosecurity reform agenda discussion paper. We thank the National Biosecurity Committee (NBC) for continuing to engage stakeholders as it develops a roadmap of reform priorities for delivery over 2027–2032.

WoolProducers is the peak industry body representing Australian wool growers across animal health and welfare, biosecurity, emergency animal disease preparedness, natural resource management and industry development. WoolProducers has a strong and long-standing commitment to biosecurity, including as the wool industry signatory to the Emergency Animal Disease Response Agreement (EADRA), through our membership of Animal Health Australia (AHA), and as co-author — with Sheep Producers Australia (SPA) and AHA — of the [National Sheep Industry Biosecurity Strategy 2025–2030](#) (NSIBS). Our comments should be read alongside that strategy and our earlier submissions to the National Biosecurity Strategy and its associated 2024 Action Plan.

WoolProducers interprets the reform agenda as a genuine opportunity to refocus delivery under the six NBS priority areas — provided the reforms are ambitious, outcome-driven, proportionate to a changing risk profile, and matched by a fair and system-wide approach to funding. This submission sets out our general comments and feedback on each of the reform themes.

WoolProducers wished to emphasise that effective biosecurity management is a whole-of-system responsibility — it is not the responsibility of industry or government alone. Protecting Australia requires coordinated interventions across the entire biosecurity continuum — pre-border, at the border and post-border — and the active participation of all stakeholders, including governments, industry, environmental and community groups, and individual land managers. The reform agenda should be framed and resourced accordingly, so that effort and investment can be directed wherever across that continuum they will deliver the greatest risk reduction, rather than being concentrated at a single point in the system or on a single group of stakeholders.

General comments

An outcome-first approach with measurable goals

Reforms — short, medium and long term — must be built around meaningful goals that support clear, measurable outcomes, backed by transparent monitoring, evaluation and reporting. Performance measures such as interception rates, leakage surveys, diagnostic, surveillance and response metrics, combined with robust data on the costs of actual and potential incursions and the costs of risk mitigation and preparedness measures, would give

all parties a clearer picture of the system's current state and better inform prioritisation. WoolProducers notes the 2022–2032 NBS commitment to a formal strategy review in 2027 and considers that this review should provide detailed data, measured against a baseline, to guide future action plans and reform priorities. Evidence-based evaluation also builds the social licence and confidence on which the system depends.

Recommendation 1: Ensure proposed reforms are based on delivering meaningful outcomes backed by measurable goals, with robust monitoring and evaluation frameworks, and that the 2027 NBS review is a robust data-driven review.

Alignment with existing NBS structures and partners

WoolProducers is concerned that the proposed reforms lack clarity as to how they align with the existing NBS architecture — in particular the six agreed priority areas and the Implementation and Action Plans. It is not clear whether the reforms will be delivered through those plans, nor how they map to the priority areas. Notably, 'shared biosecurity culture' (NBS Priority Area 1) and social licence are not among the reform themes, despite Agriculture Ministers identifying social licence as a key strategic risk, with which WoolProducers agrees. No agreed NBS priority should be deprioritised or discontinued through a focus on the reform themes alone, and without further consultation.

The reforms should also leverage, rather than duplicate, the various stakeholder organisations, strategies and frameworks already operating across the system. The fundamental biosecurity activities — anticipate and prepare, screen and prevent, detect, respond, and recover — are common right across the continuum, whether undertaken at the international, national, regional or enterprise level. Established member-based bodies such as AHA and Plant Health Australia (PHA) bring government and industry together and should be embedded in delivery, as should industry-specific strategies relevant to wool growers — including the NSIBS, AnimalPLAN and the AUSVETPLAN suite of resources and Commonwealth, state and territory biosecurity plans.

Much of Australia's biosecurity system is delivered through existing industry systems and regional networks — Research and Development Corporations (RDCs), industry service providers, state farming organisations, private veterinarians and representative bodies all play a key role in preparedness, communication and response. These pathways provide an interface with growers that cannot easily be replaced or duplicated by government, and must be supported and resourced as a genuine partnership.

Recommendation 2: Clarify how each reform aligns with the six NBS priority areas and which plan will deliver it; embed social licence and a shared biosecurity culture across the agenda; and ensure reforms leverage existing organisations (AHA, PHA), industry strategies and regional delivery networks rather than duplicating them.

A changing and dynamic risk profile

WoolProducers supports the discussion paper's recognition that biosecurity risks continue to grow in scale, complexity and cost. We caution, however, against framing the risk environment as one in which all risks are uniformly and permanently increasing. The national risk profile is dynamic: while some risks are rising — driven by climate change, shifting trade and travel patterns, and global instability — others are stable, declining, or are now amenable to more contemporary and proportionate interventions.

Advances in technology and the steady accumulation of historic surveillance and response data are changing what an efficient response to a given risk looks like. Electronic identification

(eID) and enhanced traceability for sheep, improved diagnostics, remote and digital surveillance tools, and the prospective use of artificial intelligence all create opportunities to manage long-standing risks more efficiently, to sharpen proof-of-freedom assurance, and to reallocate finite resources towards areas of greatest contemporary need. A genuinely risk-based system must be capable of re-targeting or winding back effort where the evidence supports it — not only of adding new layers of activity and cost. WoolProducers therefore strongly supports the proposed national biosecurity threat assessment and national surveillance data-sharing reforms and considers they should be designed explicitly to capture this dynamism, so that preparedness, surveillance and resourcing decisions reflect the current and projected risk profile rather than historic assumptions.

This dynamism reinforces a point WoolProducers has made consistently: there must be clear differentiation between exotic and endemic pests, weeds and diseases, while recognising that the same biosecurity principles apply to both. Whether something is 'exotic' or 'endemic' depends on the level of assessment — a disease endemic at the national level may be exotic at the enterprise level. The current federated model, under which the Commonwealth regulates exotic threats and the states and territories regulate endemic threats, is not always conducive to uplifting biosecurity culture or embedding shared responsibility at the enterprise level. Significant opportunities exist to leverage the messaging, tools and data from endemic pest and disease programs — which producers engage with every day — to lift the system's capacity to prepare for, detect and respond to an exotic incursion.

Recommendation 3: Design the national threat assessment and surveillance reforms to reflect a dynamic risk profile — enabling resources to be re-targeted as risks rise, fall or become amenable to contemporary, technology-enabled interventions — and leverage endemic pest and disease programs to build exotic-disease preparedness at the enterprise level.

Feedback on the reform themes

Preparedness

WoolProducers strongly supports a renewed focus on preparedness and urges that prevention be enshrined as a core priority of the reform agenda. The economics are well established: prevention delivers by far the greatest return, with returns of around 1:100 at the prevention stage falling to as little as 1:5 once a pest or disease must be contained. Management of risk at and before the border, where returns are greatest, must remain a priority for the Australian Government, complemented by strong on-farm and enterprise-level practice. We support the proposed on-farm and business preparedness program and the continued uplift of traceability — including extension of traceability ambition to plant products — and note that industry's own investments in eID, the National Sheep Health Declaration and supply-chain integrity can be leveraged to strengthen both preparedness and response.

Recommendation 4: Ensure preparedness reforms include an explicit priority on prevention, recognising its superior economic return, and build on existing industry traceability and farm-biosecurity tools.

Response

WoolProducers supports efforts to make national response arrangements faster, harmonised, adaptable and evidence-driven, and to address well-understood gaps in funding, flexibility and scope. Activities such as surveillance sit outside existing deed arrangements and are too often managed on an ad-hoc basis; greater clarity and consistency. Critically, surveillance and

preparedness activities should be informed by comprehensive and regularly updated risk analysis to ensure that finite resources are focused on the highest risks, therefore minimising response times and enhancing the chances of a return to a pre-incursion state.

Recommendation 5: Deliver improved, regularly updated risk analyses for pests, weeds and diseases that fully account for the costs of responses, non-responses and non-eradication, and provide clear, harmonised decision-making and funding pathways — including for transition to management where necessary.

Recovery

WoolProducers supports the development of a national biosecurity recovery framework. We are concerned, however, that the proposals do not adequately address a core issue for industry — the ongoing costs borne by producers where eradication is not feasible or has not succeeded. Support for affected industries throughout the industry transition phase, not just during the “transition to management” phase of the formal response, is vital. Any such support mechanisms must be developed through extensive consultation with industry signatories to the existing response deeds.

Recommendation 6: Ensure recovery and transition-to-management arrangements provide genuine support to industry during containment and ongoing management, not only for the formal “transition to management” after a response concludes.

Workforce capability and capacity

A capable, sustainable workforce underpins the whole biosecurity system. A national biosecurity workforce strategy should span the full breadth of the workforce — including on-farm, private veterinary and research roles — and account for the significant constraints on regional and remote workforce that currently limit some jurisdictions. WoolProducers is particularly concerned about surge capacity to respond to concurrent or large-scale incursions, and considers that education and training providers, industry and RDCs must be engaged alongside government in delivering the strategy.

Operational capability, data and research

WoolProducers supports better-connected national operations, improved and earlier data sharing, and a national capability assessment. We are concerned, however, that research and innovation have been confined to this single theme rather than treated as a cross-cutting priority across the entire biosecurity continuum. The substantial body of RD&E delivered by the RDCs should be better shared, less duplicated, and adopted more rapidly, with research embedded as a priority within preparedness, response and recovery. Data-sharing reforms are welcome and should be underpinned by clear governance addressing user access, ownership and privacy.

Recommendation 7: Embed research and innovation as a cross-thematic priority across the biosecurity continuum and underpin data-sharing reforms with governance that protects producer data ownership, access and usability.

Legislation and regulation

WoolProducers supports removing regulatory inconsistencies that create complexity or unnecessarily impede domestic trade without delivering biosecurity benefit and supports national harmonisation — enacted through industry consultation — including the modernisation of inefficient paper-based systems. Consistent with our earlier submissions, regulatory decisions should be supported by science, risk assessment and stakeholder consultation, and must not be unnecessarily limited to, or extrapolated to fit, the geographical

boundaries of a particular jurisdiction as a matter of regulatory convenience. Any regulatory reform must not weaken the integrity of the biosecurity system.

Funding

Sustainable, equitable funding is fundamental to the success of every other reform; without it, no other reform can reach its potential. WoolProducers recognises that funding is becoming an increasing challenge for all stakeholders involved in managing biosecurity — not just governments. Rising costs and competing priorities are felt right across the system, including by wool growers and the broader agricultural sector who already invest substantially in on-farm activity, RD&E, supply-chain integrity and response. This reinforces the need for funding solutions that are equitable, system-wide and sustainable, rather than approaches that shift cost onto those already carrying a significant share. WoolProducers remains open to discussing funding and investment models that are fit-for-purpose, targeted to shared priorities, and to which all participants contribute equitably.

Any review of biosecurity funding must be system-wide and not isolated to Commonwealth biosecurity activities. Additionally, the Commonwealth must acknowledge the substantial cash and in-kind contributions that wool growers and the broader agricultural sector already make to the national biosecurity system — through levies, on-farm activity, RD&E, supply-chain investment and response participation — before any consideration of new or increased charges on industry. The failed attempt to impose a Biosecurity Protection Levy on Australian farmers — seeking to address a shortfall created by insufficient cost-recovery of regulatory activities — was short-sighted and diminished trust among stakeholders. Such a mistake must not be repeated. Finally, risk-creators, particularly importers, must contribute at a level proportionate to the risks they create, and the beneficiaries of risk mitigation (not just primary producers) must also play their part, so that those who already fund the system are not left to subsidise others.

Any assessment of alternative funding mechanisms should follow best-practice policy development, including independent analysis and genuine co-design. This should draw on the substantial existing literature — including the 2017 Craik review of the Intergovernmental Agreement on Biosecurity, the Productivity Commission's 2023 report on industry levies, and the 2023 Frontier Economics evaluation of sustainable funding options. Alternative models, such as a dedicated biosecurity future fund. Finally, industry's existing financial and in-kind contribution must be properly quantified to inform any funding discussion.

Recommendation 8: Ensure funding reforms follow best-practice, evidence-based policy development; assess the whole system rather than Commonwealth activities alone; require proportionate contributions from risk-creators and beneficiaries; properly quantify and acknowledge industry's existing contribution; and rule out further ad-hoc charges on producers.

Strategy implementation and governance

As the reform agenda is used to refocus delivery under the NBS to 2032, WoolProducers encourages the NBC to streamline governance in a way that strengthens, rather than dilutes, the role of non-government stakeholders. Reform initiatives should be organised clearly under the NBS priority areas, with transparent roles and responsibilities across the Commonwealth, states and territories, industry, environmental and community groups. Engagement should move beyond consultation towards genuine co-design, and monitoring and reporting — including the NBS Annual Report and the 2027 review — should provide the data needed to demonstrate progress and maintain confidence in the system.

WoolProducers thanks the NBC for the opportunity to contribute and looks forward to continuing to participate in the development of the reform agenda. Should you wish to discuss this submission further, please contact WoolProducers' General Manager, Mr Adam Dawes, on 0455 442 776 or gm@woolproducers.com.au.

Again, thank you for considering this submission.

Yours Sincerely,



Jo Hall
CEO
WoolProducers Australia

