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1 October 2025

Department of Agriculture Fisheries and Forestry
National Food Security Strategy team
GPO Box 858
CANBERRA ACT 2601

Submitted via upload

Dear National Food Security Strategy team,

RE: National Food Security Strategy – Discussion Paper Submission

Please find attached the Australian Seed Federation's submission in response to the National Food Security Strategy Discussion Paper.

ASF welcomes the opportunity to contribute to the development of this important national strategy and acknowledges DAFF's leadership in advancing a coordinated, whole-of-system approach to food security. Our submission highlights the strategic importance of seed in delivering a resilient, productive and globally competitive food system.

We look forward to ongoing engagement with government and industry partners to support the strategy's implementation and ensure that seed is recognised as a foundational element of Australia's future food security.

Yours sincerely,

Katherine Delbridge
Chief Executive Officer
Australian Seed Federation

Feedback for shaping the National Food Security Strategy

The Australian Seed Federation (ASF) welcomes the opportunity to contribute to the development of the National Food Security Strategy. As the peak industry body for the seed sector in Australia, ASF represents the full spectrum of the seed value chain, from R&D and plant breeders to seed producers and marketers as well as exporters and companies that provide services to the seed industry.

Seed is the first and most essential input in agricultural production. Whether in broadacre cropping, horticulture, pasture, or specialised systems such as organic or protected cropping, seed determines the potential yield, quality, and resilience of the crop. All food production begins with seed - there is no harvest, no food supply, without it. Seed enables farmers to grow the crops that feed people, sustain livestock, and support supply chains across the entire food system. Access to diverse, high-quality seed varieties underpins food production, productivity, adaptability to climate variability, and the capacity to meet shifting market and dietary demands.

Given the critical role that seed plays across all components of the food system, ASF's submission focuses on three areas outlined in the discussion paper:

- 2.1 Resilient Supply Chains
- 2.2 Productivity, Innovation and Economic Growth
- 3.4 Trade and Market Access

In addressing these priorities, ASF recommends that the strategy:

- Explicitly recognise seed as a strategic input in food security planning,
- Prioritise Plant Breeder's Rights reform as an enabler of productivity growth, and
- Proactively support seed export development and international regulatory alignment to strengthen Australia's role in regional and global food systems.

1. Resilient Supply Chains

Australia's seed supply chains operate on a seasonal production cycle, with precise planning and coordination required to ensure that the right varieties are available in the right volumes, to the right growers, at the right time.

While Australia produces a significant volume of seed domestically, the industry also relies on imported seed and germplasm to meet seasonal, regional, and genetic diversity needs. These imports support not only commercial crop production but also breeding programs that underpin long-term food system resilience.

Disruptions to seed supply – whether from weather events, biosecurity incidents, regulatory delays, or breakdowns in logistics – can cause missed sowing windows, reduced crop productivity, and, ultimately, diminished food availability and supply chain stability.

The National Food Security Strategy must recognise seed as a foundational input within emergency management, supply chain resilience frameworks, and critical infrastructure investment. This includes supporting efficient and science-based import pathways, modern phytosanitary systems, and contingency planning to maintain access to essential seed during crises.

Seed is a globally traded input. Australia's participation in international seed trade – both imports and exports – is essential to ensure growers have timely access to the best-adapted genetics. Global movement of seed enables diversification, innovation, and continuity across growing seasons. As such, any national approach to food security must include clear mechanisms to safeguard the cross-border movement of seed.

ASF recommends:

- **Elevating seed as a critical input** in national supply chain risk planning, with specific inclusion in emergency response frameworks – especially for natural disasters, biosecurity events, and trade or logistics disruptions.
- Acknowledging **Australia's reliance on imported seed and germplasm** by ensuring that biosecurity and import systems are resourced and responsive.
- **Strengthening biosecurity** at borders and within domestic systems to reduce the risk of pest and disease incursions that can affect both seed production and broader crop yields. This includes harmonised interstate seed movement protocols to prevent regional fragmentation during crises and ensure continuation of movement.
- Investing in infrastructure and logistics systems that **support resilient regional seed production, storage, and transport** – with a focus on climate-vulnerable and remote areas.
- Championing **Australia's active engagement in international standards development**, particularly through the International Plant Protection Convention (IPPC), to support a multilaterally recognised Systems Approach for seed. This would streamline phytosanitary certification and improve Australia's access to global seed resources.

2. Productivity, Innovation and Economic Growth

Plant breeding is a key driver of innovation, productivity and sustainability in agriculture. New plant varieties deliver benefits across the entire food system: improving yield, quality, disease resistance, input efficiency and climate resilience. These benefits flow from years of targeted research, often supported by significant investment.

Australia's **Plant Breeder's Rights (PBR) framework** has long played a critical role in enabling this innovation. The ASF acknowledges and supports the foundational value of Australia's PBR legislation in protecting the interests of plant breeders and encouraging varietal development.

To ensure the system remains effective and aligned with the needs of a modern, globally connected seed industry, ASF supports an urgent, considered process of **updating and reforming the PBR framework**. These reforms should aim to provide clarity, consistency and confidence to both breeders and users of plant varieties, while maintaining the balanced protections the current system provides.

ASF recommends:

- **Modernise the PBR Act** to reflect contemporary plant breeding practices and international norms, including harmonisation of the International Union for the Protection of New Varieties of Plants' (UPOV) definition of Essentially Derived Varieties.
- **Enhance compliance and education initiatives** to build awareness of PBR obligations throughout the supply chain, reducing unintentional misuse of protected varieties and supporting good stewardship of intellectual property.
- **Maintain a balanced and fair system that supports breeders** while also ensuring growers, researchers and seed producers can operate with transparency and certainty.
- **Support the participation of diverse breeding organisations**, including smaller and diverse enterprises, by ensuring the PBR system is accessible, enforceable and inclusive.

3. Trade and Market Access

Australia's seed exports contribute not only to our economic growth but also to regional and global food security. The export of high-performing seed varieties helps strengthen food systems in neighbouring countries and supports Australia's broader geopolitical and trade objectives. At the same time, participation in international seed markets improves the viability and scale of domestic seed production — delivering benefits back to Australian growers through enhanced breeding pipelines, competitive pricing, and access to globally sourced genetics.

Australia is well placed to expand its seed export footprint, particularly for temperate and tropical pasture species sought-after by many nations. However, this opportunity is often constrained by non-tariff trade barriers, including inconsistent recognition of Australia's robust quality assurance systems, and fragmented phytosanitary requirements that limit access to key markets.

To strengthen both domestic and international food system resilience, government action must prioritise regulatory harmonisation, targeted trade facilitation, and support for export-ready seed enterprises. Seed must be recognised as a strategic export, even if its trade volume is small compared to bulk commodities. Its value lies in its critical role in underpinning agricultural productivity and food system stability — both within Australia and across the Indo-Pacific.

ASF recommends:

- **Ensure seed is strategically included in trade negotiations and market access dialogues**, particularly with key markets in Southeast Asia, the Pacific, and the Middle East. While seed may represent a small volume compared to bulk commodities, its value and strategic importance are significant.
- **Invest in technical market access for seed**, including the negotiation of phytosanitary protocols, mutual recognition of testing and certification systems, and promotion of Australian accreditation under OECD and ISTA standards.
- **Support domestic capacity for export readiness**, particularly among small-to-medium enterprises. This includes guidance on compliance, access to export facilitation grants, and international market intelligence.
- **Advance Australia's role in international standards bodies**, including the International Plant Protection Convention and OECD Seed Schemes, to shape globally accepted rules that reduce trade friction and support science-based regulatory systems.
- **Recognise the dual role of seed in both supporting domestic agricultural productivity and underpinning Australia's contribution to regional food security**, especially in times of geopolitical instability, climate stress, or supply chain disruption.

4. Conclusion

A National Food Security Strategy that explicitly recognises the strategic role of seed will be better equipped to deliver a food system that is resilient to shocks, responsive to innovation, and competitive on the global stage. Seed is at the foundation of agricultural productivity, determining not only what can be grown, but how sustainably, efficiently and adaptively food is produced across varied Australian landscapes.

The Australian Seed Federation is committed to working in close partnership with government, producers, research institutions and supply chain stakeholders to help shape and implement a strategy that reflects the full value of the seed sector. This includes contributing practical insights, supporting policy and regulatory development, and facilitating communication across industry.

ASF recognises the complexity of the national food system and welcomes the strategy's holistic, collaborative approach. We strongly support the Strategy's objectives and stand ready to contribute constructively to its development, roll-out and long-term success.

Summary of Recommendations:

High Priority Recommendations

ASF recommends that the National Food Security Strategy:

- Explicitly recognise seed as a strategic input in food security planning,
- Prioritise Plant Breeder's Rights reform as an enabler of productivity growth, and
- Proactively support seed export development and international regulatory alignment to strengthen Australia's role in regional and global food systems.

Recommendations: Resilient Supply Chains

- Elevate seed as a critical input in national supply chain risk planning, with specific inclusion in emergency response frameworks – especially for natural disasters, biosecurity events, and trade or logistics disruptions.
- Acknowledge Australia's reliance on imported seed and germplasm by ensuring biosecurity and import systems are resourced and responsive.
- Strengthen biosecurity at borders and within domestic systems to reduce pest and disease risks and enable harmonised interstate seed movement.
- Invest in infrastructure and logistics systems that support resilient regional seed production, storage, and transport – particularly in climate-vulnerable and remote areas.
- Champion Australia's active engagement in international phytosanitary standards development (e.g., through the IPPC), including support for a Systems Approach to seed.

Recommendations: Productivity, Innovation and Economic Growth

- Modernise the Plant Breeder's Rights Act to reflect contemporary plant breeding practices and international norms, including harmonisation with UPOV definitions.
- Enhance compliance and education initiatives across the supply chain to support good stewardship of protected varieties.
- Maintain a fair and balanced system that supports breeders while enabling transparent and confident participation by growers, researchers, and seed producers.
- Ensure the PBR system remains accessible and inclusive for small, regional, and diverse breeding organisations.

Recommendations: Trade and Market Access

- Ensure seed is strategically included in trade negotiations and market access dialogues, particularly in the Indo-Pacific region.
- Invest in technical market access for seed, including mutual recognition of testing and certification systems and international promotion of Australian standards (e.g., ISTA, OECD).
- Support domestic seed export readiness through compliance guidance, market intelligence and export facilitation for SMEs.
- Advance Australia's role in international seed and phytosanitary standards bodies to reduce non-tariff barriers and support science-based regulation.
- Recognise seed's dual role in supporting domestic productivity and regional food security, especially during times of supply chain stress or geopolitical uncertainty.

ASF looks forward to continued engagement with the Department and welcome the opportunity to contribute to the development and implementation of this important strategy.