

**Australian
Seed Federation**



**Public Consultation –
national biosecurity
reforms:**
*Agenda discussion
paper*

12 June 2026

Biosecurity Strategy and Reform Division
Department of Agriculture, Fisheries and Forestry
GPO Box 858
Canberra ACT 2601, Australia



Sent via: Have your say portal

Dear Biosecurity Strategy and Reform Division

Re: Public Consultation – national biosecurity reforms: agenda discussion paper

The Australian Seed Federation (ASF) supports the direction of the National Biosecurity Reform Agenda and its recognition of key system pressures, including workforce constraints, funding sustainability and the need for improved data integration. ASF's members operate across the seed supply chain and are highly dependent on an efficient and reliable biosecurity system. For the seed industry, the success of the reform will be measured by tangible improvements in operational performance, particularly at the border.

ASF's submission focuses on five key areas of the discussion paper:

- Overall reform priorities (**Discussion Questions 1.1 and 1.2**)
- Workforce capability and capacity (**Discussion Question 5.2**)
- Operational capability and system performance (**Discussion Questions 6.2 and 6.3**)
- Sustainable funding (**Discussion Question 8.2**)
- Partnerships and engagement (**Discussion Question 9.5**)

ASF recommends that national biosecurity reforms address the following key points:

- **Workforce capability must translate to improved service delivery.** Workforce shortages, particularly in specialised areas such as seed inspection, are contributing to delays. Reforms must include sector-specific capability and measurable performance outcomes.
- **Operational efficiency is critical and currently under-emphasised.** System and process inefficiencies, including digital constraints, are limiting effectiveness. User-centred system design and streamlined border processes are essential.
- **Funding reform must be transparent and linked to performance.** Future funding models must be transparent, co-designed with industry, and linked to improved system performance.
- **Partnerships must move beyond consultation to co-design.** Industry expertise should be embedded in reform design and delivery, including through international approaches such as the Systems Approach for Seeds.

ASF supports continued engagement to ensure reforms deliver a biosecurity system that is effective, efficient, and fit for purpose.

Yours sincerely

A handwritten signature in black ink, appearing to read "Katherine Delbridge".

Katherine Delbridge
Chief Executive Officer



INTRODUCTION

The ASF is the peak national body representing the interests of Australia's sowing seed industry at the state, national and international levels. The ASF membership base comprises stakeholders from all sectors of the seed supply chain including plant breeders, seed growers, seed processors and seed marketers, all of whom were consulted in the preparation of this submission.

In Australia, the seed industry is a vital link in the development of crops that are critical to the country's agricultural and horticultural productivity, sustainability, and food security.

Overview and reforms priorities (Q1.1 and Q1.2)

ASF supports the overall structure of the proposed reform themes and their alignment with key strategic risks identified by governments. These themes are broadly consistent with the priorities raised in ASF's 2024 submission.

However, ASF considers that the current framework places stronger emphasis on strategic architecture rather than operational performance outcomes. For the seed industry, biosecurity system effectiveness is most clearly demonstrated through timely and predictable border clearance, efficient inspection processes and reliable system functionality.

ASF recommends that the reform prioritises:

1. Workforce capability and capacity.
2. Operational capability and system efficiency.
3. Funding reform, contingent on demonstrated system improvements.
4. Partnerships, embedded across all stages.

Greater emphasis should be placed on ensuring that reforms deliver measurable improvements in service delivery.

Workforce capability and capacity (Q5.2)

ASF strongly supports the prioritisation of workforce capability as a foundational reform area. Current workforce constraints are having direct impacts on the seed industry. ASF members continue to experience delays in seed import clearance, driven in part by a shortage of biosecurity officers with specialised expertise in seed inspection. In some cases, limited resourcing has resulted in extended delays, affecting supply chains, increasing costs, and creating risks to seed viability.

While the proposed workforce forecasting and strategy development are supported, ASF considers that the reforms do not yet sufficiently address sector-specific capability gaps or link workforce investment to operational outcomes.

ASF recommends:

- Development of commodity-specific training pathways, including seed inspection capability.
- Establishment of formal industry-government training partnerships, leveraging existing industry expertise.
- Introduction of performance metrics, including measurable improvements in clearance times and inspection turnaround.

Workforce reform must ensure that capability is not only developed but effectively deployed to meet operational needs



Operational capability and system efficiency (Q6.2 and Q6.3)

Operational capability is critical to the effectiveness of the biosecurity system and is closely linked to workforce performance.

ASF members have identified ongoing challenges with system inefficiencies, including digital platforms that have introduced delays and reduced flexibility in operational settings. These issues can prevent timely inspections and create bottlenecks, even where workforce capacity is available.

While the discussion paper appropriately highlights the importance of data sharing and national coordination, there is limited focus on user experience and system usability, end-to-end process efficiency at the border and integration between digital systems and operational workflows.

Reforms should support the continuous improvement of seed import systems, ensuring that import requirements are underpinned by sound science, targeted to identified risks and regularly reviewed to maintain their effectiveness and proportionality, while maintaining confidence in both biosecurity outcomes and the broader seed supply chain.

ASF recommends:

- A user-centred redesign of biosecurity digital systems, ensuring they support frontline operations.
- A comprehensive review of border processes, particularly for high-volume and time-sensitive commodities such as seed.
- Stronger alignment between workforce reforms and system functionality, ensuring officers are enabled to perform efficiently.

Without improvements in operational systems, workforce and funding reforms will not achieve their intended outcomes.

Sustainable funding and investment (Q8.2)

ASF supports the objective of establishing sustainable biosecurity funding arrangements. However, funding reform must be carefully designed to maintain industry confidence and ensure long-term effectiveness.

ASF's 2024 submission highlighted concerns regarding the Biosecurity Protection Levy, including limited industry consultation and lack of transparency in its development. This has contributed to a degree of uncertainty regarding future funding reforms.

ASF also notes the importance of ensuring that increased costs do not adversely affect the competitiveness of Australian industries, particularly those engaged in international trade.

ASF recommends:

- An efficiency-first approach, where improvements in system performance are demonstrated alongside or prior to increased funding contributions.
- Development of funding models through transparent, co-designed processes with industry.
- Consideration of international competitiveness impacts, particularly for globally traded commodities such as seed.

A sustainable funding model must deliver clear value to all contributors to maintain support.



Partnerships and investment (Q9.5)

ASF supports the emphasis on stronger partnerships within the biosecurity system. However, there is an opportunity to strengthen how these partnerships are implemented in practice. To date, engagement has often been consultative rather than collaborative, with limited opportunities for industry to participate in co-design of reforms.

ASF also highlights the importance of leveraging existing industry expertise and international initiatives, including the Systems Approach for Seeds, which can support more efficient and harmonised global seed trade.

ASF recommends:

- Establishment of formal co-design mechanisms to support early and ongoing industry involvement.
- Recognition of industry as an active delivery partner, particularly in training, data sharing, and operational improvements.
- Greater alignment with international harmonisation efforts, including seed-specific frameworks.

Effective partnerships will be critical to the successful implementation of the reform agenda.

Conclusion

ASF supports the reform agenda and the opportunity to strengthen Australia's biosecurity system.

To ensure reforms deliver meaningful outcomes, it is essential that:

- Workforce capability is directly linked to service delivery performance
- Operational systems are efficient, practical, and fit-for-purpose
- Funding reforms are transparent and supported by demonstrated improvements
- Industry is engaged as a genuine partner in design and delivery

ASF looks forward to continued engagement as the reform agenda progresses.