

Attn: Biosecurity Queensland
Department of Agriculture, Fisheries & Forestry
Email: BiosecurityAct@daff.qld.gov.au

BACKGROUND TO THE REGULATORY IMPACT STATEMENT RELEASE FOR PUBLIC COMMENT BY BIOSECURITY QUEENSLAND DUE 21ST NOVEMBER 2014.

Review of biosecurity regulations: what it means for cattle

"A Regulatory Impact Statement (RIS) has been released for public comment. You are invited to comment on alternative options for managing cattle ticks, and on the distribution of public and private benefits of property registration.

The RIS proposes three options for a property registration fee. These three approaches weigh the public and private benefits of the proposed property registration system."

Cattle tick

"Listed below are the proposed options for managing cattle tick. We would like to hear from you on your preferred option

Option 1 is to maintain the current provisions.

Option 2 is to create two biosecurity zones (infested and free), with movement restrictions on host species travelling from the infested area to the free area based on risk of spread.

Option 3 is to rely on the general biosecurity obligation"

Property registration

"We would like to hear your preference for a fee for property registration.

Currently no fee is charged for property registration in Queensland. The RIS considers three options for a property registration fee:

- **Option 1** is to continue to provide property registration services without charging a fee (the fee would be set at \$0).
- **Option 2** is to introduce a fee for property registration based on the full cost of providing the service (the fee would be based at \$357.55 for 3 years).
- **Option 3** to introduce a fee for property registration that recognises both public and private benefits are derived from property registration and, as such, a fee should be subsidised at 66 per cent (the fee would be \$119.20 for 3 years)

Options 2 and 3 will only apply to those who meet the Australian Taxation Office ruling of carrying out the business of primary production "

How to have your say

To provide comment on the options listed, or for more information about them and proposed regulation for other biosecurity risks, including banana pests, bees, mango pests and fees:

Visit: www.getinvolved.qld.gov.au Contact: Biosecurity Queensland on 13 25 23 or email BiosecurityAct@daff.qld.gov.au

Submission Response from :

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Property Rights Australia (PRA) was formed in 2003 to provide a strong voice for landowners with regard to property rights issues. It aims to promote fair treatment of landowners in their dealings with government, businesses and the community.

Our philosophy is that if the community (or business) wants our resource for any other purpose such as environmental protection then the community must pay fair and unsterilised value for it.

Most of our members are in Queensland but we have members in all States.

Property Rights Australia notes that the Regulatory Impact Statement primary aim is for Queensland biosecurity management to maintain the tick-free area.

Of concern to Queensland Landholders has been the continual reduction and urbanisation of experienced staff from within the Department of Agriculture, Fisheries and Forestry (which includes all staff within Biosecurity Queensland) by both the previous and the current Government.

Agriculture is one of the Four Pillars of Economic Growth detailed in the current Government's plan for the future, with expansion of this industry being targeted to double by 2040.

In order for both biosecurity management to maintain tick-free areas or manage current and future outbreak of any other potential biosecurity risks, adequate experienced staffing must be increased and maintained. Location and local availability of Stock Inspector/Biosecurity Inspectors/ Veterinary Officers within the Biosecurity Department in D.A.F.F. must be extended and decentralised in order to be more pro-active on the ground in rural areas.

The reduction of staff, in the Department of Agriculture, has led to an added cost being imposed onto agriculture and especially those impacted by biosecurity issues.

The current system has worked well in the past, but the recent outbreaks of both ticks and the Bovine Johnes Disease has shown the reduction in experienced staff within the Department of Agriculture has been a major problem. Experienced on the ground staff are essential to be able to monitor and quickly deal with issues in local communities, when biosecurity issues arise.

Some Landholders have already been seriously impacted financially due to inadequate information being made available later rather than accurate information provided earlier in the process.

The following news article indicates one couples hardship which could have been avoided if accurate advice had been provided early in the process and the Vet had access to experienced staff who understood how the process worked:

<http://www.beefcentral.com/production/stock-handling-and-animal-welfare/letter-vic-levy-policy-will-save-more-qld-heartbreak-over-bjd>

The property should have been removed from quarantine as soon as the biopsy results showing negative were returned which do not take longer than 14 weeks. There would not be the need for further discussion on compensation if experienced staff had been sourced and retained in D.A.F.F. The Landholder has incurred considerable cost in order to ensure Queensland's high level of Biosecurity requirements are being met. The reduction of staff by the Government over recent years, which resulted in fewer experienced and specialised Biosecurity and Counselling staff during the BJD outbreak has directly added to the costs both for the State Government and the impacted landholders.

If additional funding had been provided and the depletion of the DAFF and Biosecurity Queensland staff addressed with the change of Government, the cost to producers and the community would have been significantly less when outbreaks of Ticks and BJD were first notified.

Notification times for the Brangus BJD outbreak (which was prior to the Brahman BJD outbreak) were delayed by approx 3 months upon positive biopsy confirmation to Queensland's Biosecurity Staff by Victoria's Biosecurity Staff when immediate notification would have ensured less impact on many producers in Queensland. This was not the landholder but the Government departments between States that were at fault.

Testing facilities should have been retained in Toowoomba and Townsville, as this type of regional presence is essential when local abattoirs such as Oakey are easily accessible by Biosecurity Vets. In the case of BJD it was essential that gut samples were swiftly made available to ensure no unnecessary delays would occur for producers.

Up to date information needs to be provided to local feedlots, who were in a position to have continued to process "Suspect" BJD cattle which would have ensured many landholders could have taken time to trade out of their situation. Unfortunately many feedlots (detailed in written pamphlets supplied by Biosecurity Queensland and the Cattle Council of Australia as being able to facilitate Suspect BJD feed-on cattle) were not prepared to take these cattle. It required the feedlot cattle to be kept in separate pens and if needing antibiotics a separate hospitalisation pen. There was a major breakdown in communication between DAFF, Queensland Feedlots and the impacted Producer. These feedlot cattle could be safely marketed and unable to spread their bacterial gut disease through Queensland's cattle herds as all feedlot cattle are destined for the meatworks and are not introduced back into cattle production areas.

There was only one Counsellor(Campbell Trotter) assigned for BJD impacts for both Queensland and New South Wales by the Cattle Council of Australia when the Brangus BJD outbreak occurred. This contact by the Counsellor was a very important part of knowing how to work with the impacts on the cattle herd and trade out of the situation if the suspect cattle tested positive. This was considered part of the non-financial component from the National BJD Financial and Non-Financial Assistance Package.

This BJD Counsellor was to conduct a situation assessment, assist with considering management and trading options, develop a business plan and liaise with the supervising veterinarian.

Property Rights Australia strongly believes all Biosecurity Protocols are for the good of all Queenslanders and all communities. No producer should incur any further costs.

The current provisions for control have served Queensland well over time, with continual reduction in the tick line since the early 1950s and the control of such diseases as brucellosis, which have formed part of our history.

What are currently impacting landholders are the continual financial costs of red tape that Government said they would look to reduce. PRA believes that the implementation of any further costs on the livestock industry will be just another layer of red tape and does not address the real issue of lack of trained biosecurity staff within regional Queensland.

Another proposed property registration fee is unnecessary when Property Identification Codes are already detailed in compulsory National Vendor Declaration Books and registered to compulsory national livestock identification tags required for cattle sales in Queensland which are for the good of industry and all communities. Both are paid for by the landholder and livestock producer. Property Rights Australia advocates the following:

- **for managing Cattle Tick : Option 1** *Maintain the current provisions but ensure biosecurity staff are increased in number within regional Queensland with the ability to provide support to the cattle industry and early response should an issue arise*
- **for Property Registration Fees: Option 1** *Continue to provide property registration services without charging a fee (the fee would be set at \$0).*

To continue with both these Options will ensure both public and private benefit occur.

Any variation would mean that both public and private interests will be significantly disadvantaged.

Yours faithfully,

Dale Stiller

Dale Stiller
Chairman
Property Rights Australia Inc