



29 June 2023

Ms Kaylene Gulich
Chair
BAM Act Review Panel
C/- Department of Primary Industries and Regional Development
Via e-mail: BAMAreview@dpird.wa.gov.au

Dear Ms Gulich

RE: Stage 3 Public Comment - Review of the Biosecurity and Agriculture Management Act 2007

INTRODUCTION

The Pastoralists and Graziers Association of WA (PGA) is a non-profit industry organisation established in 1907, which represents primary producers in both the pastoral and agricultural regions of Western Australia.

Current membership numbers equate to 84% of all pastoral leases, excluding Indigenous and conservation leases, and 21% of broadacre producers in the agricultural regions of Western Australia. This includes grain, livestock and mixed enterprises.

As an organisation which consists solely of primary producers from both the pastoral and agricultural regions who actively participate in the Industry Funding Scheme (IFS) Committees and the Recognised Biosecurity Groups (RBGs), the PGA seeks to contribute throughout all stages of the review to ensure that Western Australia has a contemporary and robust post border biosecurity governance and management framework that is efficient, effective and sustainable, and is a genuine shared responsibility between State Government (and its agencies and departments) and landowners.

Further to our previous submission dated 7 July 2022, and our supplementary submission dated 4 December 2022, we are pleased to provide this submission regarding the areas of reform as outlined in the Stage 3 Discussion Paper.

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SUMMARY

Upon reviewing the Discussion Paper and following discussions with our members, the PGA would like to express our concerns over the proposals listed in *Reform Area 7 Enabling industries to act*, and *Reform Area 8 Community- led pest management*, specifically:

- the use of the fee for service mechanism under the *Agriculture Produce Commission Act 1988* (APC) to support collective and coordinated biosecurity action, and;
- the collective pooling of the Declared Pest Rate (DPR) and matched funds, and the broadening of the range of pest management entities that are eligible to receive these pooled DPR/ matched funds.

AGRICULTURE PRODUCE COMMISSION (APC)

The APC was established 35 years ago under the then *Horticultural Produce Commission Act 1988* as a statutory authority with the primary function of supporting the horticultural industry by establishing producers' committees to market their product. The Act was amended in 1999 to include non-horticultural agriculture related industries under the newly named *Agricultural Produce Commission Act 1988* (the "Act"). In 2021 the Act was amended to remove the previous exemption for broadacre cropping and grazing industries under the fee for service; however, the pastoral industry remains exempt.

The PGA remains opposed to the removal of the broadacre industries exemption under the APC, even with the exclusion for the pastoral industry. Under the Act, if a committee of producers is formed, **it is compulsory for all producers of the product, or all in a recognised area to pay the Fee for Service (FFS).**

The introduction of any FFS under the APC Act will impose a new and compulsory financial impost on broadacre farmers and graziers, and duplicate the same services expected under current Federal RDC levies, and the State based Industry funding schemes.

Levy funded services including those for biosecurity are delivered by both statutory authorities and industry owned corporations such as the GRDC, AWI, MLA, Plant Health Australia, Animal Health Australia, and the National Residue Survey.

In addition, the Commonwealth recently imposed a 10% Biosecurity levy on all existing Commonwealth transaction levies.

According to a recent analysis by accounting firm RSM International, these levies currently represent 12% to 15% of a farmer's profit.

POOLING OF DECLARED PEST RATE AND MATCHING FUNDS

The PGA is concerned over the collective pooling of the Declared Pest Rate (DPR) and matched funds, and the broadening of the range of pest management entities that are eligible to receive these pooled DPR/ matched funds.

The proposed pooling and apportioning of funds in no way guarantees that funds collected will come back to the area in which the rate was collected, nor will it be spent on pest control activities - jeopardising long-term projects and community led initiatives.

It is the PGA's opinion that the RBG model is working well as it provides community (including landholders) assistance and guidance on Declared Pest management on their properties. The provision of a Declared Pest Rate provides sustainable funding for LOCAL groups to manage LOCAL pests and is an effective way to manage these pests with landholders contributing funds for pests on a nil-tenure basis. It provides direct community buy-in and responsibility from landholders/community on reporting declared pests and management of declared pests.

RBGs have already established great partnerships with government/industry/NRM/Farming groups and other local community groups to raise awareness and have delivered real on-ground outcomes. However there needs to be a fair and proper balance between competing interests. Pooling and broadening the range of entities eligible to receive funding, will only serve to weaken the ability of the RBG's, as they will be forced to compete for funding with smaller organisations, many of which have little if any experience in dealing with major feral pest control.

Further it is the PGA's position that the proposed uniform rating system for the DPR, will not provide greater stability in revenue nor will it improve administrative efficiency and fairness. Having a proposed new State body tasked with considering all local pest priorities and ensuring that the agreed priority pests are appropriately managed at a landscape scale will only serve to weaken the existing RBG / DPR system.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Tony Seabrook', with a long horizontal flourish extending to the right.

Tony Seabrook
PGA President