

Biosecurity Bill 2014

**Submission to the Senate Standing Committee on Rural and Regional
Affairs and Transport**

on behalf of the

Australian Chicken Meat Federation Inc.

Summary.

The Australian Chicken Meat Federation (ACMF) is concerned that the staggered process of drafting and releasing the new Bills and their associated regulations and guidelines may not allow the new system to be considered as a whole before the primary legislation is considered by Parliament.

ACMF therefore urges the Committee to insist on having before it all regulations, and related guidelines where possible, prior to finalizing its considerations so that the full picture can be considered by the Committee and the Parliament.

ACMF believes that the inclusion of a formal requirement to consult with stakeholders on both scope and approach before the Director of Biosecurity publishes a public notice detailing a Biosecurity Import Risk Analysis (BIRA) process would strengthen the proposed BIRA and increase community confidence in its integrity. This requirement could be included in the regulations rather than the Act itself.

ACMF also believes that the current IRA arrangements, which provide for a review by the Eminent Scientists Group (ESG) where an expanded IRA is being undertaken, are essential to the integrity of the process and should be retained in the new BIRA regulations and/or guidelines.

Who we represent

The Australian Chicken Meat Federation Inc. (ACMF) represents all elements of the Australian chicken meat industry, including chicken growers and processors at the national level.

Members of the Federation are the five State Chicken Meat Councils, the Australian Chicken Growers' Council and the Australian Poultry Industries Association, the latter representing the chicken meat processors.

The chicken meat industry is Australia's largest meat industry on a domestic per person consumption basis.

A highly efficient and vertically integrated industry, it has developed steadily over the past 50 years to an annual turnover now of around \$2.7 billion on an asset base of \$6 billion and employs 40,000 people directly and 120,000 in total throughout Australia.

The process

ACMF acknowledges the extensive consultation that has been undertaken in the context of the previous bill, Biosecurity Bill 2012, to ensure the new biosecurity legislation meets stakeholders' requirements. We also acknowledge that some of the concerns raised during the Senate Committee considerations in 2013 have resulted in amendments to the previous bill.

ACMF has participated in these consultations and has identified issues of importance to the industry in these forums as well as in its previous submissions to this Senate Committee regarding Biosecurity Bill 2012.

The Senate committee system plays an important role in ensuring legislation presented to the Parliament is fully and properly debated. The Senate committee process provides an opportunity for stakeholders to have input into the form of legislation before it is put to the vote.

In this instance, as in the case of the Biosecurity Bill 2012, this process is being constrained by the tabling of only part of the legislative package that will underpin the new regime.

ACMF is concerned that the staggered process of drafting and releasing the new legislative framework does not allow stakeholders to consider the new system as a whole before the Bills are considered by Parliament.

Most of the detail that will govern the effectiveness of the legislation, and the costs involved in its implementation, will be contained in the subordinate regulations and the guidelines, which are yet to be released.

ACMF therefore urges the Committee to demand access to all regulations, and related guidelines where possible, prior to finalizing its report and prior to the legislation being debated in the Parliament.

The Biosecurity Import Risk Analysis (BIRA)

ACMF notes that the Department is currently undertaking a separate review of the import risk analysis process. We have provided written input into this review process. Our main concern is to ensure that the transparency and scientific evidence based process as it is currently practiced is retained, including the important role of the Eminent Scientists Group, which reviews whether scientific and technical information and arguments are taken into account appropriately when the IRA is being developed.

This is a good example where the primary legislation available to the Senate Committee (and the Parliament) is by itself not providing sufficient information to demonstrate that its implementation will meet our expectations. It is for this reason that ACMF urges the Committee to demand access to all regulations, and related guidelines where possible, prior to finalizing its report and prior to the legislation being debated in the Parliament.

ACMF believes that the inclusion of a formal requirement to consult with stakeholders on both scope and approach before the Director of Biosecurity publishes a public notice detailing a BIRA process would strengthen the proposed BIRA and increase community confidence in its integrity.

ACMF believes that the current arrangements, as detailed in the Import Risk Analysis Handbook 2011 (available on the Departmental website), are essential to the integrity of the process and should be retained in the new BIRA regulations.

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