



AgForce Queensland Farmers Limited

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29 May 2026

Biosecurity Queensland
Department of Primary Industries
1 William Street
BRISBANE QLD 4000

By email: BQConsultation@dpi.qld.gov.au.

Good afternoon,

Re: Sunset review of Queensland's Biosecurity Regulation 2016

AgForce Queensland Farmers Limited (AgForce) is a peak organisation representing Queensland's cane, cattle, grain and sheep, wool & goat producers. The cane, beef, broadacre cropping and sheep, wool & goat industries in Queensland generated around \$11.2 billion in on-farm value of production in 2022-23. AgForce's purpose is to advance sustainable agribusiness and strives to ensure the long-term growth, viability, competitiveness and profitability of these industries. Over 6,000 farmers, individuals and businesses provide support to AgForce through membership. Our members own and manage around 55 million hectares, or a third of the state's land area. Queensland producers provide high-quality food and fibre to Australian and overseas consumers, contribute significantly to the social fabric of regional, rural and remote communities, as well as deliver stewardship of the state's natural environment.

AgForce welcomes the opportunity to provide a submission to the sunset review of Queensland's Biosecurity Regulation 2016.

AgForce previously provided a submission to the sunset review last year on the 19th of December. Our submission requested a number of amendments, primarily around recognising farm biosecurity plans and ensuring third party access compliance. Unfortunately, most of these amendments were not incorporated into the changes proposed. The changes remain a priority for AgForce and this submission reinforces the points previously raised.

AgForce also has concerns that the General Biosecurity Obligation (GBO) is not being sufficiently enforced in relation to pest management by parties including State forestry and National Parks. AgForce supports the enforcement of this obligation, and additional amendments that would require the Queensland Parks and Wildlife Service to undertake concrete pest control measures where significant feral pest presence has been reported.

The changes AgForce propose are outlined below.

1. Biosecurity Management Plans

Section 94G unnecessarily narrows the scope of what constitutes a property biosecurity plan by requiring it be explicitly titled "biosecurity management plan." Many landholders maintain robust property biosecurity plans embedded within whole-of-farm management systems, quality assurance programmes, or risk frameworks that may not carry this specific title. AgForce submits that any property biosecurity plan meeting prescribed minimum standards should be recognised for the purposes of the Regulation, regardless of

naming convention. Section 94G(4)(c), which limits signage to plans titled "biosecurity management plan," should be amended on the same basis.

Section 94H(2)(c) exempts persons entering land under another Act from the requirement to comply with a biosecurity management plan. While such persons retain a GBO, the absence of an enforceable requirement to comply with property plans shifts risk to landholders while removing their ability to require proportionate mitigation measures. This is a material gap and warrants amendment.

2. Third-party access and biosecurity risk

AgForce members consistently report that mining companies, infrastructure operators, renewable energy proponents, contractors, and service providers refuse to engage with property biosecurity management plans. Remoteness is no longer a protective factor, FIFO workforces in energy and mining sectors move between properties, regions, and international destinations including FMD and lumpy skin disease hotspots. Pre-work activities such as drill testing and greenfielding compound this risk. Landholders bear the economic, regulatory, and reputational consequences of any incursion but currently lack any effective mechanism to seek assurances from companies accessing under statutory rights.

Access agreement negotiations are also growing in cost and complexity, with biosecurity protections often eroded through stalling and pushback. Entry frequently occurs with limited notice and no practical opportunity for landholder review. Compliance with inter-property clean-down and decontamination procedures is inconsistent.

The Regulation should better support the principle that the value of natural capital assets, infrastructure, pasture, and productive land is determined by the landholder. Decisions about acceptable risk should not be overridden by third-party operational convenience.

3. Chemical use by third parties

Related concerns arise from the absence of enforceable obligations on third parties, contractors, councils, renewables, utilities, to provide spray records and activity notifications. Spraying is regularly undertaken under powerlines, around gas infrastructure, and along access corridors without notice or chemical records. This places landowners at risk of breaching withholding periods, export slaughter intervals, and Livestock Production Assurance requirements. Producers in reef and water quality management areas face particular exposure. The current framework does not adequately support landowners to meet their downstream compliance obligations.

4. Restricted matter

AgForce supports amendments allowing greater flexibility in the disposal and reuse of Category 3 and Category 7 restricted matter where biosecurity risk can be appropriately managed. Enabling cost-effective reuse for bioenergy and other beneficial purposes would reduce compliance costs without compromising biosecurity outcomes.

5. Fire ant machinery movement

AgForce supports clearer and more explicit requirements relating to machinery movement from fire ant suppression zones. Machinery operating in soil and carrier material should be cleaned and be free of carrier material before leaving a suppression zone.



An amendment detailing reasonable steps to clean machines should be included in the Regulation.

6. Enforcement of Pest Management General Biosecurity Obligation and Amendment Requiring Action By Queensland Parks and Wildlife

AgForce supports stronger enforcement of the General Biosecurity Obligation (GBO), along with an amendment requiring the Queensland Parks and Wildlife Service to undertake concrete pest control measures in areas where significant feral pest presence has been reported.

Effective pest management requires a coordinated and consistent approach across all land tenures, including State forests and National Parks, as unmanaged feral animal populations can quickly spread into adjoining agricultural land and undermine the efforts of private landholders.

The GBO to control pests applies to government managed land, however producers regularly report that these sites are often breeding grounds for pests. Enforcing the current GBO as it relates to pest management and amending the regulation to require concrete pest control action be taken by Queensland Parks and Wildlife if feral pest presence is reported would improve accountability, reduce the economic and environmental impacts of feral pests and help build a more effective statewide biosecurity framework.

7. Enforcement of cattle tick movement requirements

AgForce supports the cattle tick management provisions but considers their value is undermined by inconsistent enforcement. The movement requirements set a clear standard, yet a minority of operators move stock without proper inspection, treatment, or certification and are rarely detected or penalised. The cost falls on compliant producers and, critically, on receivers who accept cattle on the strength of a valid certificate and then bear the expense of restricted-property management when ticks are later detected. This is changing buying practices and depressing market floors across Queensland, a burden that runs counter to the Regulation's objective, because it is the failure to enforce, not the rules themselves, that generates the cost.

AgForce recommends the remade Regulation prescribe a clear schedule of offences suitable for Penalty Infringement Notice issuance, covering movement without required inspection or treatment, and absent or falsified documentation, so authorised officers can apply proportionate, transparent penalties that producers, transporters, and agents understand in advance. A consistently enforced regime is the most direct way to restore confidence in the tick-free zone and in the certificates the market relies upon.

a. Independence of accredited certifiers

The reliability of the system also depends on the independence of accredited certifiers. Where a certifier certifies stock they own, or that belongs to an entity employing them, a conflict of interest arises that goes to the integrity of every certificate the market relies upon. AgForce recommends independence be the default standard for accredited certification, with a transparent business-case exemption pathway determined by the Director-General for the limited cases where independent certification is genuinely impractical.

b. Fair allocation of the General Biosecurity Obligation

This compounds an existing inequity in how the General Biosecurity Obligation is applied. It is neither fair nor defensible for a producer who receives cattle inspected (scratched) and certified free of cattle tick by an accredited certifier to then be fined and quarantined when ticks are subsequently detected. That receiver



has discharged any reasonable inquiry by relying on a valid certificate; where the certificate proves unreliable, the consequences should follow the certifier or consignor responsible, not the producer who relied on it in good faith. The Regulation should allocate the General Biosecurity Obligation consequence to the point of failure, not to the party least able to have prevented it.

Conclusion

The Biosecurity Regulation 2016 is necessary to support effective biosecurity management across Queensland and AgForce supports its continuation. The Regulation is only effective, however, where there is consistent enforcement and where exemptions that undermine property-level biosecurity are addressed. AgForce's recommended amendments would empower landholders to manage risk on their own terms and ensure the Regulation remains fit for purpose.

AgForce welcomes continued engagement with Biosecurity Queensland as the review progresses.

If you have any questions or require further information please contact Alexander Desses, Sheep, Wool and Goats Policy Director by email desses@agforceqld.org.au or via phone at 0428 889 052.

Sincerely,

Niki Ford

Chief Executive Officer
AgForce Queensland

