



23 April 2017

Dr Helen Scott-Orr
Inspector-General of Biosecurity
Australian Government Department of Agriculture and Water Resources
PO Box 657
MASCOT NSW 1460

Dear Dr Scott-Orr

Re: A review of the circumstances leading to the 2017 suspension of uncooked prawn imports into Australia and the biosecurity considerations relevant to future trade in uncooked prawns.

The Queensland Seafood Industry Association (QSIA) is pleased to be able to provide a submission to the review of the circumstances leading to the 2017 suspension of uncooked prawn imports into Australia and the biosecurity considerations relevant to future trade in uncooked prawns.

It has been made clear that the review will not take into consideration the economic and social impacts of white spot disease (WSD). Simply stated, the national biosecurity system has failed the Queensland commercial seafood industry. That failure has had and continues to have direct financial and market implications for industry.

The reason for a working biosecurity system is to protect the Australian community, the environment and industry. To conduct a review of that system that will examine the impacts on trade in prawns but not fully examine the broader economic impacts of WSD is disappointing given your organisation is independent of government.

If you have any questions regarding this submission, please contact Eric Perez, QSIA CEO on mobile: 0417 631 353 or email: eo@qsia.com.au.

Regards

A handwritten signature in black ink, appearing to read "Keith Harris", is placed above the typed name.

Keith Harris
President
Queensland Seafood Industry Association

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QSIA RESPONSE TO INSPECTOR-GENERAL OF BIOSECURITY REVIEW

1. INTRODUCTION

This submission reflects the frustration felt by commercial fishers at what appears to be a catastrophic failure of the Australian biosecurity system. The Queensland Seafood Industry Association (QSIA) is deeply concerned with this failure and hope this submission assists the Inspector-General for Biosecurity (IGB).

2. ABOUT QSIA

QSIA is the peak body for the commercial fishing industry in Queensland. The association is funded by voluntary membership fees, research projects and government grants.

QSIA provides the link between industry and the State and Federal governments and non-government organisations and industry bodies. The QSIA Board is advised by commercial fishing committees (in the crab, net, line and trawl fisheries) whose members possess decades of industry experience.

The prime responsibility of the QSIA is to facilitate and act on behalf of industry on a whole range of issues including fisheries management, marine planning, fisheries legislation and management plans, licensing and access, native title, research and development, media statements, industry promotion and developing positive image of the Queensland seafood industry.

3. SCOPE OF THE REVIEW

QSIA understands that the scope of this review covers operational policy and activities relevant to biosecurity risks associated with importation of uncooked prawns and prawn meat into Australia. It is also understood that the review will consider the following areas:

- The effectiveness of biosecurity controls and their implementation for managing the biosecurity risks of importation of uncooked prawns and prawn meat into Australia;
- The effectiveness of post-entry surveillance measures and 'end use' import conditions for uncooked prawns and prawn meat into Australia; and
- Areas for improvement in the biosecurity risk management framework and its implementation for future trade in prawns and related seafood.

The review will not examine:

- The economic and social impacts of the WSD outbreak and prawn trade suspension on prawn farmers, seafood importers or commercial and recreational fishermen and associated businesses and communities.

4. RESPONSE TO THE REVIEW

4.1. CONTEXT

The definitive cause of the current WSD outbreak is currently not fully understood but the fact that a disease that is foreign to Australia has been detected in farmed prawn and in the wild harvest fisheries in Moreton Bay has raised the question – ‘how could this happen?’

The Queensland commercial fishing industry has been the victim of a catastrophic failure of the national biosecurity system.

The failure had nothing to do with the Queensland commercial seafood industry and everything to do with two key factors:

- (1) The industry’s voice being ignored a decade ago; and
- (2) A shifting of risk from government to the market which allowed some businesses to allegedly undermine the biosecurity system¹.

Industry warned Biosecurity Australia of the potential catastrophic failure of allowing uncooked, green prawn product into the country. In 2007, QSIA provided comments regarding Biosecurity Australia’s report, *Revised Draft Generic Import Risk Analysis Report for Prawns and Prawn Products*. The following issues remain a concern for QSIA 10 years later²:

- ‘There is a clear possibility of continuous cross-infection between aquaculture and wild fisheries once an exotic virus establishes itself in Australian waters.
- Establishment of an exotic disease carried into Australia on prawn meat would have severe flow-on effects throughout the entire marine environment.
- There would be serious socio-economic effects in wild fisheries and downstream industries, with serious consequences for regional economies and employment.
- The establishment of exotic prawn diseases in Australian waters would add enormous cost and complexity to current domestic fisheries management arrangements, and may render some current management practices impractical or destructive to the economic wellbeing of Australian fishers’.

The Federal and Queensland governments have refused to compensate industry for its losses in part, arguing that biosecurity is a shared responsibility. Industry are the victims of a failed system and need not have been. Suggesting that the Queensland

¹ In mid-January 2017, the Australian community was advised that the Federal government was pursuing criminal charges against a Chinese importer, ‘It is understood the department believes some importers could have been colluding to deliberately cheat Australia’s quarantine and bio-security systems. Several methods have allegedly been used to do this including:

- Substitution — knowingly submitting clean product for testing while hiding infected product.
- Empty consignments, including empty bags and other containers in shipments allowing for product substitution.
- Deliberately mislabelling product so it does not have to be tested.
- Collusion with foreign prawn suppliers’.

ABC News, 17 Jan 2017, posted 1:44pm by Michael Atkin, [‘Importers ‘swapping prawns’ so white spot disease is not detected, Barnaby Joyce fears’](#).

² QSIA correspondence to Animal Biosecurity Secretariat, Biosecurity Australia, 19 February 2007, pages 4-5, see **Attachment 1**.

seafood industry should develop a levy to pay for future biosecurity issues shifts responsibility from government to industry which is morally unacceptable³.

Industry do not set the policy and operational parameters of biosecurity at the border; and industry does not have any influence over foreign biosecurity practices. So the ongoing protection of the marine resource from pathogens lays, in the first instance, with the Federal government.

The IGB noted that the review process will not examine the economic and social impacts of WSD is a way to shield the Federal government from taking responsibility for what appears to be a systemic government failure.

The following sections provide an industry perspective and the best available science in order to fully respond to the review areas noted by the IGB.

4.2. REVIEW AREA 1

The effectiveness of biosecurity controls and their implementation for managing the biosecurity risks of importation of uncooked prawns and prawn meat into Australia.

The effectiveness of current biosecurity controls at the international border are in serious question and present an unacceptable level of risk to domestic wild caught seafood stocks. This statement is based on several pieces of evidence available to QSIA.

The Department of Agriculture and Water Resources (DAWR) have assigned a Prawn Liaison Officer (PLO) to provide industry with information regarding the suspension of imported prawn and results from enhanced disease testing at the border. In correspondences sent to industry on 3 March 2017, the following WSSV test results were provided to industry (see **Attachment 2**).

Table 1.
WSSV Test Results

| Summary | No of Batches Fully Tested | No of Batches Released | No of Batches Refused |
|---------|----------------------------|------------------------|-----------------------|
| Total | 68 | 30 | 38 |

³ Commercial fishers in Queensland pay licence fees to access the marine resource. There is no property right that industry can exercise so unlike land based agriculture responding to diseases is made more difficult in aquatic environments. It was suggested by Senator O'Sullivan that industry in Queensland should have been better prepared, the Senator noted, 'Mr Perez, I am afraid you cannot leave anything at the doorstep of government in relation to this, in my view, and I think you need to get on with it urgently to bring the relevant stakeholders in your industry at least to agree on what your response is going to be to an offer from the state government that may or may not include adequate compensation to your industry members'. Industry is still responding to the discovery of WSD and a broader discussion of compensation and who is accountable to whom is a discussion that is yet to be had. Hansard reference – Committee Hansard, Senate Rural and Regional Affairs and Transport References Committee biosecurity risks associated with the importation of seafood and seafood products into Australia (public) Monday, 10 April 2017, Brisbane, pg.25.

Using the data provided by the PLO, 56 percent of batches tested have been refused so at this level of testing, compared to 16.3% prior to implementation of the enhanced passed through quarantine and hit retail counters in the leadup to Christmas 2016 was positive for WSSV.

This is unacceptable under any risk management system and given increased surveillance, how much larger was the percentage of contaminated prawn product entering Australia? Indeed, QSIA understands that DAWR staff revealed during a Senate estimates hearing on 28 February 2017⁴ that testing of imported prawns at retail counters in supermarkets near the Logan River in late December/early January 2016/17 found that 14 of 19 samples (73.6%) were positive for WSSV and that levels of virus in these prawns were high enough to cause infection of Australian wild stocks of crustaceans if the infected products found their way into the water via bait or burley pathways or via processing wastes.

The recent detection of WSSV positive prawns in northern Moreton Bay, around 70 km north of the Logan River, suggests that more than one incursion has occurred and it appears the only plausible explanation for this would be through introductions of WSSV at multiple locations, which could plausibly happen through the bait and burley pathway.

Biosecurity Queensland discovered several groups of recreational fishers using imported green prawns as bait near the WSD affected prawn farms on the Logan River, and the confiscated bait prawns tested WSSV positive⁵. This is clearly an unacceptable situation and proves that previous statements from the Interim Director General of Biosecurity in 2010⁶ that the risks of introduction of WSSV positive imported prawns entering bait and burley pathways are *extremely low* were incorrect.

The Interim Director General of Biosecurity also suggested³ at that time that the risk of WSSV establishing in Australia from releases of WSSV infected imported prawns accidentally released through quarantine were *negligible*. Clearly, this statement was not correct. The latter statement is supported by the second piece of evidence, which is the introduction of a ban on uncooked green prawn imports on 6 January 2017 due to suspected deliberate contravening of the nation's strict biosecurity controls⁷.

Unfortunately, this latter situation was entirely predictable, given that the Interim Director General of Biosecurity himself stated at the time⁸ that the process of testing and screening prawn shipments for diseases during quarantine was prone to "human error and oversight", and that under existing clearance arrangements, "positive results

⁴ Senate Estimates (2017). Committee Hansard, Rural and Regional Affairs and Transport Legislation Committee. Estimates Tuesday 28 February 2017.

⁵ Diggles BK (2017). Field observations and assessment of the response to an outbreak of White Spot Disease (WSD) in Black Tiger Prawns (*Penaeus monodon*) farmed on the Logan River in November 2016. FRDC Project Number 2016-064. February 2017.

⁶ Dunn K (2010). An examination of the likelihood of imported raw peeled prawns that tested positive for White Spot Syndrome Virus (WSSV) and were mistakenly released into Australia by the Biosecurity Services Group (BSG) entering high risk pathways and of then causing WSSV to establish in Australia. Report of the Interim Inspector General of Biosecurity, 30 November 2010.

⁷ See **Attachment 3**.

⁸ [Interim Inspector General of Biosecurity: Incident Review 2010](#)

could be accidentally overlooked". The most recent incidents demonstrate a systemic failure of Australia's biosecurity systems has occurred.

4.2.1. CONCERNS WITH THE MANAGEMENT OF RECREATIONAL FISHING

Under a disease outbreak scenario access to the marine environment needs to be assessed and under the biosecurity response in Queensland it was. Industry's position at the outset was to ban all forms of fishing until WSD could be eradicated.

Why did the Queensland government not adopt a 'zero take' approach to managing the event? That is, absolutely not take of seafood of any kind until the eradication process was completed. Could the Federal government override a State's biosecurity response for the sake of preserving the marine environment?

The Federal government has temporarily suspended the importation of uncooked green prawn as a means to protect local wild caught and farmed prawn fisheries on a national basis. If a potential pathway for the disease was addressed by government why did it not occur to Federal government agencies to ban all forms of fishing in the Logan River?

QSIA remains concerned that a lack of political will and more critically a lack of departmental resources to monitor the recreational take of green prawns and crabs from the Moreton Bay region. On 13 February 2017, QSIA wrote to Dr Jim Thompson (Chief Biosecurity Officer for Queensland) asking the following question⁹, 'The area (just outside the Logan River) where the recent infected prawns were discovered is not commercially trawled but heavily fished by recreational fishers using cast nets – why has a ban not been introduced?'

Under the initial movement control order commercial fishers were asked to decontaminate but not mandated under the order. While there is no evidence that recreational fishers were supposed to do the same. QSIA also raised concerns regarding recreational fishing on 27 February 2017 noting¹⁰:

There are hundreds of recreational fishers accessing the Logan River region fishing for crabs and prawn each week since the introduction of the movement control order. What is the rationale that allows recreational fishing to continue when WSD remains a risk to crustacean stocks? Does DAF and/or BQ have the boating and fisheries staff to monitor recreational fishers in the movement control area?

What is the government's long-term priority – continued recreational fishing or ensuring that WSD has been eliminated from the Logan River which is to the benefit of all users of the marine environment?

The Queensland government introduced movement control orders that applied to both the commercial and recreational fishers. However, the reluctance of the State

⁹ See **Attachment 3**, pg.1.

¹⁰ See **Attachment 4**, pg.2.

government to apply further 'no take' restrictions may have allowed the movement of the disease to areas north of the river.

4.2.2. MISSED OPPORTUNITY

It is unclear if either the State or Federal governments have the legislative power under current biosecurity arrangements to ban all forms of fishing once a disease has been detected.

Given the impacts of WSD on the Queensland and potentially national crustacean fisheries, a greater emphasis of total fishing bans in the Logan River should have been considered despite the inconvenience that it might have caused to recreational anglers.

It is also unclear if biosecurity legislation has the flexibility to allow for total fishing bans as means to protect the marine environment.

4.3. REVIEW AREA 2

The effectiveness of post-entry surveillance measures and 'end use' import conditions for uncooked prawns and prawn meat into Australia.

Clearly the post-entry surveillance measures used by DAWR as informed by the 2009 prawn import risk assessment have proven to be entirely inadequate for preventing incursions of WSSV, resulting in Australia's first outbreak of WSD in the wild capture fisheries. Despite biosecurity protocols requiring testing of 100% of shipments of frozen green prawns imported into Australia there is evidence that WSSV-infected frozen green prawns were transiting through border quarantine resulting in >85-86% of imported green prawns sold at the retail counter at supermarkets in Australia in November/December 2016 being WSSV positive¹¹.

Statistically, even if testing at the border was 100% effective, because only 65 prawns were being examined from each shipment, even if they were properly randomly sampled throughout the shipment, and the testing used was 100% accurate 100% of the time, statistical tables suggest this would provide 95% confidence of detecting WSSV infected prawns only if they were present at prevalence above 5% in each shipment¹².

Hence even with 100% compliance and 100% sampling effectiveness, assuming between 10,000 and 15,000 tonnes of raw prawns are now imported into Australia each year (data from FRDC¹³), 5% prevalence may equate to several hundreds of tonnes of WSSV infected frozen green prawns entering Australia and becoming available for retail purchase at supermarkets. Furthermore, there was no testing required for other risky products like marinated prawns or soft shelled crabs, all of which have equal or greater risks of containing viable WSSV given the large host range of the virus, which affects all crustaceans.

¹¹ FRDC 2016-066 – Assessing compliance and efficacy of import conditions for uncooked prawn in relation to White Spot Syndrome Virus (WSSV).

¹² See [ausvet](http://ausvet.gov.au).

¹³ <http://frdc.com.au/trade/Pages/Crustacean-Full.aspx>

QSIA is not opposed to imports and a concept of fair trade between countries. In 2006, QSIA supported the position that no uncooked prawns should be permitted to be imported into Australia. This remains the association's view.

This view was also shared by one of the world's most pre-eminent institutions in shrimp disease research, Professor Donald V Lightner who noted:

I view imported commodity shrimp/prawns as a significant and high risk to shrimp aquaculture, to aquatic ecosystems and to fisheries. My lab has published a number of papers to fill in knowledge gaps identified in government risk assessments.

My lab and others have confirmed the frozen commodity shrimp/prawn products are anything but safe commodities. The awareness is increasing that there are direct pathways for disease introduction to wild or farmed shrimp/prawns with imported infected shrimp/prawns being used as bait or as waste from value added reprocessing of these products¹⁴.

Recent data from the European Union confirms earlier fears that WSSV from frozen supermarket prawns is highly infective for other crustaceans¹⁵, which means the presence of WSSV in supermarkets even at 5% prevalence represents an unacceptable risk to the commercial seafood industry. The root of the problem is that biosecurity authorities have no real control over end use once these products clear quarantine and/or after it is sold at the retail store, and it is well known that recreational anglers commonly use supermarket prawns for bait and burley.

QSIA notes that efforts have been made to educate recreational anglers not to use supermarket products as bait, but in the real world we all know this will be largely ineffective, or quickly forgotten, and the products will continue to be used or disposed of in the aquatic environment. Because it's inevitable that if green imported prawns are made available for retail sale as seafood that some will eventually be used as bait or burley, tighter quarantine requirements are needed to reduce the risk of introduction of not only WSSV, but other diseases of crustaceans.

It makes no sense to try to apply risk mitigation after retail sales of seafood have taken place. Trying to control risk after retail sales is the equivalent of shutting the gate after the horse has well and truly bolted. Clearly, the proper way to control risk in this supply chain is either pre-border, or at the border.

Once these products clear quarantine, and enter the retail chain, all control of the end use of a product is lost. It is unclear what the traceability process (if any) are once imported seafood products enter the Australian domestic seafood market.

¹⁴ QSIA correspondence to Animal Biosecurity Secretariat, Biosecurity Australia, 19 February 2007, pg.2, see **Attachment 1**.

¹⁵ Bateman KS, Munro J, Uglow B, Small HJ, Stentiford GD (2012). Susceptibility of juvenile European lobster *Homarus gammarus* to shrimp products infected with high and low doses of white spot syndrome virus. *Diseases of Aquatic Organisms* 100, pgs.169-184.

4.4. REVIEW AREA 3

Areas for improvement in the biosecurity risk management framework and its implementation for future trade in prawns and related seafood.

As mentioned above, the proper way to control risk in this supply chain is either pre-border, or at the border. Once these products clear quarantine, and enter the retail chain, all control of the end use is lost.

Pre-border or at border controls that could be implemented to reduce risk to acceptable levels without impacting volume of trade include treatments to inactivate any virus or other disease agents that are present, or testing for diseases of concern and rejection of diseased shipments. As discussed previously, if a testing program is chosen to mitigate risk, it must be done in such a manner that testing protocols cannot be circumvented, and a large enough sample should be taken to provide confidence that prevalence of disease agents of concern are sufficiently low that risks remain minimal.

Even if each consignment was tested to a <1% prevalence level (requiring samples of 300 prawns to be taken from each consignment in a random fashion), there would remain a chance of human error, and tests are not always 100% reliable. Furthermore, new diseases continue to emerge in prawn farms for which there are no tests available, sometimes for many years, and it is well known that many important diseases of crustaceans were spread widely before they were identified and tests became available¹⁶. The lesson that government should consider from this disease incursion is that greater investment and attention be paid to the development of tests of imported seafood into Australia becomes a policy imperative.

The requirement for sensitive testing is at odds with the high volumes of imported prawns that are traded into Australia, you can have one, but not the other. It is easy to test low volumes of commodities thoroughly for the diseases you know of, but as trade volumes increase, either resources required for testing must increase to meet the demand, dramatically increasing costs, or else errors begin to be made and risks of incursions skyrocket.

Chances are if a new disease emerges, unless we are very lucky, it may become established in Australia before a reliable test becomes available. As trade volumes increase, the risk of disease and biosecurity breaches become inevitable, which is unacceptable to the seafood industry.

QSIA notes that compulsory cooking of imported terrestrial meat products is required for products coming from countries with foot and mouth disease¹⁷. These conditions are accepted by the exporting countries and are widely accepted by industry and consumers in Australia as necessary to protect our local cattle, pig and sheep industries and hence our food security with regard to meat products from species that

¹⁶ Lightner DV (1999). The penaeid shrimp viruses TSV, IHNV, WSSV, and YHV: current status in the Americas, available diagnostic methods, and management strategies. *Journal of Applied Aquaculture* 9, pgs.27–52.

¹⁷ Commonwealth of Australia (2004b). Generic Import Risk Analysis (IRA) for pig meat. Executive summary and quarantine requirements for importation of pig meat. February 2004.

can contract foot and mouth. Why then, are the seafood industries of Australia being treated any differently?

We know that WSSV and virtually all other diseases of crustaceans are inactivated by cooking¹⁸, and we contend that WSSV, being an OIE Listed disease, is the aquatic equivalent of foot and mouth. Therefore, QSIA contends that crustacean seafood products from countries where WSSV is known to occur should only be allowed into Australia if they are cooked prior to entry, otherwise the risks of introduction of WSSV and/or other new and emerging diseases into the future are too great.

It is clear that the seafood industry does not have a level playing field compared to non-seafood industries like beef and pork. By requiring cooking prior to entry, the processes of inspection at the border would be simplified.

The technology required to cook seafood is virtually no cost, and we would no longer have this ridiculous situation whereby uncooked commodities enter Australia from WSSV positive countries overseas, while commercial fishers in South East Queensland have to cook their product prior to sending them over the border to NSW or up to North Queensland. Such are the many advantages of compulsory cooking as a “least cost, highest effectiveness” phytosanitary process, it is a wonder that it was not implemented after the 2009 Import Risk Assessment – if it was we would certainly not be in the mess we are in at the moment.

5. STRATEGIC POLICY ISSUES

There are a number of policy issues for consideration:

- a) It should be re-emphasized that the local requirements for cooking prawns before its movement outside the control zone is clear evidence that this is what the Queensland government considers to be its appropriate level of protection. It makes no sense whatsoever to have stricter quarantine requirements domestically than internationally. All that does is discriminate against Queensland businesses while hastening the spread of the disease to other areas of the country via imported products.
- b) Based on the risks posed by imported, uncooked green prawn are the only solution is to require all imported products to be cooked. QSIA does not oppose the importation of seafood into Australia but does support calls for more stringent biosecurity safeguards for imported product. The focus of biosecurity, as always, needs to be on the protection of domestic wild harvest and, aquaculture sectors in Australia¹⁹.
- c) QSIA is not opposed to the export and re-importation of Australian green product to other countries given the majority of Australian prawn stocks are white spot free. There is of course the need to ensure there are safeguards in place to stop substitution and cross-contamination.
- d) The overall risks of exotic diseases to Australia are far greater for the seafood industries than they are to the food production sectors using domesticated animals

¹⁸ Biosecurity Australia (2009). *Generic Import Risk Analysis Report for Prawns and Prawn Products*. Final Report. Biosecurity Australia, Canberra, Australia. 7 October 2009.

¹⁹ Committee Hansard, Senate Rural and Regional Affairs and Transport References Committee biosecurity risks associated with the importation of seafood and seafood products into Australia (public) Monday, 10 April 2017, Brisbane, pgs.13-14.

like the beef and pork industries, as pigs and cattle are only farmed, while Queensland’s seafood industries mostly rely on the health of natural wild fish stocks. The potential impacts on our unique crustacean biodiversity of exotic disease incursions are unknown, as are their effects on the sustainability of our fisheries. This has been missed under current biosecurity arrangements and presents an unacceptable level of risk for Australian let alone Queensland wild harvest fisheries.

- e) Even if wild prawns or crabs or lobsters or bugs don’t die en masse, if they cannot be sold to a market for a profit they are as good as dead to a commercial operator, and surely with a new disease in the water the wild populations will become less resilient to stressors (it is well known that prawns infected with WSSV die quickly when stressed).
- f) The irony of this is not lost on an industry which has suffered greatly from the insistence on more and more marine parks with large no fishing areas that are supposed to “improve resilience”. Maybe after “increasing resilience” by locking fishers out of large tracts of ocean, by introducing exotic diseases the Federal Government is trying to reduce resilience back to normal to balance things out?

6. CONCLUDING REMARKS

QSIA would like to highlight what is at stake with respect to the Australian crustacean fisheries as a result of the failure of the biosecurity system. Table 2 provides an overview of the gross value of production (GVP)²⁰ of the crustacean fisheries on a national basis.

Table 2.
Wild-caught species by GVP

| | Prawn (\$m) | Rock Lobster and Lobster (\$m) | Crabs (\$m) | Other Crustaceans (\$m) |
|--------------------|--------------|--------------------------------|-------------|-------------------------|
| NSW | 19.0 | 12.0 | - | 9.0 |
| VIC | - | 24.0 | - | 5.0 |
| QLD | 63.0 | - | 29.0 | 18.0 |
| SA | 36.0 | 125.0 | - | 15.0 |
| WA | 37.0 | 386.0 | - | 7.0 |
| TAS | - | 89.0 | - | 5.0 |
| NT | - | - | 5.0 | 0.2 |
| Commonwealth | 107.0 | - | - | - |
| Totals | 262.0 | 636.0 | 34.0 | 59.2 |
| Grand Total | 991.2 | | | |

Source: Australian fisheries and aquaculture statistics²¹.

²⁰ The GVP is calculated by multiplying the weight of production by the landed unit value. The landed unit value is defined as the beach price for fish species caught in wild-catch fisheries and the farmgate price for fisheries and aquaculture products produced in aquaculture establishments. These prices broadly reflect the unit prices that fishers receive for their catch or that aquaculture farmers receive for their production. The unit landed value does not include any margins associated with the marketing (including freight) and services added when fisheries and aquaculture production are processed and on-sold. The use of landed value (beach price) in deriving GVP common across jurisdictions. This definition of GVP was sourced from the Australian fisheries and aquaculture statistics 2016, pg.14.

²¹ Australian fisheries and aquaculture statistics 2016. Research by the Australian Bureau of Agricultural and Resource Economics and Sciences (ABARES). Department of Agriculture and Water Resources and ABARES, pgs. 26, 30, 33, 37, 41, 44, 48 and 50.

A robust biosecurity system is reliant on the best-informed risk management logic which is established in the first instance to protect the community, industry and the environment. QSIA finds it difficult to understand how the IGB separates examining the operational policy and activities relevant to biosecurity from the economic and social impacts of the WSD outbreak. According to the IGB²² website it is stated that, 'The IGB may review the performance of functions and exercise of powers by the Director of Biosecurity. The IGB makes 'recommendations for overall system improvements'.

The failure of the biosecurity system has been referred to during Senate Estimates²³, by Dr Ben Diggles²⁴ and by the evidence provided by industry and scientific experts at a public hearing chaired by members of the Senate Rural and Regional Affairs and Transport References Committee²⁵. QSIA assumes that IGB will use multiple sources of evidence to unpack the failure of current biosecurity arrangements as they relate to the commercial seafood industry.

Without tight biosecurity at the border, it all seems to be one big experiment, with the livelihoods and sustainability of our fisheries for future generations at stake. It is vitally important that the Federal Government gets biosecurity right for the sake of future food security and the ongoing sustainability of the Australian seafood industry.

²² [IGB website](#)

²³ Senate Estimates (2017). Committee Hansard, Rural and Regional Affairs and Transport Legislation Committee. Estimates Tuesday 28th February 2017.

²⁴ Submission 1, 'Identifying and addressing the biosecurity risks to Australia associated with imported prawns and seafood products'. A submission to the Parliamentary Inquiry into the biosecurity risks associated with the importation of seafood and seafood products (including uncooked prawns and uncooked prawn meat) into Australia. Diggles, B 2017.

²⁵ Committee Hansard, Senate Rural and Regional Affairs and Transport References Committee biosecurity risks associated with the importation of seafood and seafood products into Australia (public) Monday, 10 April 2017, Brisbane.