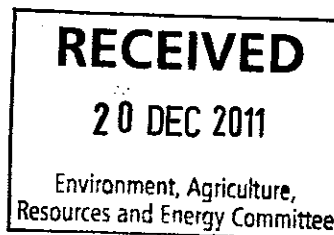


13 December 2011



The Research Director
Environment, Agriculture, Resources and Energy Committee
Parliament House
George Street
BRISBANE QLD 4000

earec@parliament.qld.gov.au

Dear Sir/Madam,

Re: Biosecurity Bill 2011

BSES is the principal research organisation supporting the Australian sugar industry. BSES has worked closely with state and federal governments on biosecurity issues. One of the key priority areas of the BSES strategic plan is to support an effective biosecurity capability for the Australian sugar industry. BSES provides technical advice on quarantine and biosecurity issues to the organizations that represent the growing and milling sectors of the Australian sugar industry and provides technical and support services to DEEDI to assist them in managing state quarantine and biosecurity regulations that apply to sugarcane. The sugar industry has provided extensive funding and support for biosecurity issues through their funding of BSES for over 110 years.

BSES believes that the draft Biosecurity Bill 2011 provides the broad powers required to meet the needs of the Australian sugar industry. BSES would like to work with DEEDI and the sugar industry representative groups to ensure that the subordinate legislation developed under the new Biosecurity Bill will maintain the legislative controls that support the management of endemic and exotic threats to the industry.

BSES has provided inspectors under the Plant Protection Act to assist DEEDI manage regulations as they apply to sugarcane. BSES would continue to offer its staff to provide suitable people as inspectors under the new Biosecurity Bill. The draft Bill allows in s247e for inspectors to be appointed from "a person or member of a class of persons prescribed under a regulation". We believe that this provision should allow the Chief executive to appoint suitable BSES staff as inspectors.

The section in the Bill on general biosecurity obligations (Chapter 2) has good intents but we believe it would be difficult to enforce because of its general nature. Many biosecurity matters (diseases, pests or contaminants) are difficult to identify and if the person from an industry or the general public cannot identify the risk then they could not be expected to discharge their obligation. Once a biosecurity threat has been identified by suitable trained specialists, and a management plan or code of practice is developed, the specific obligations under the program or code of practice are defined and the general biosecurity obligation no longer applies.

Legislation has been pivotal in the management of endemic sugarcane diseases and responding to incursions of exotic diseases. BSES supports the maintenance of a strong legislative base to assist industry manage biosecurity issues in the future. We believe that the draft Biosecurity Act 2011 will provide the basis for management of biosecurity threats in Queensland.

Yours sincerely

A handwritten signature in black ink, consisting of a large, stylized loop followed by a series of smaller, connected strokes.

ES Wallis
Chief Executive Officer