



**Animal Medicines Australia**

ABN 76 116 848 344 / ACN 116 848 34

15 National Circuit

Barton ACT 2600, Australia

**T** +61 2 6257 9022

**E** [enquiries@animalmedicines.org.au](mailto:enquiries@animalmedicines.org.au)

**W** [animalmedicines.org.au](http://animalmedicines.org.au)

12 June 2026

Biosecurity Strategy and Reform Division  
Department of Agriculture, Fisheries and Forestry

E-mail: [biosecurityreform@aff.gov.au](mailto:biosecurityreform@aff.gov.au)

Submission via Haveyoursay website:

<https://haveyoursay.agriculture.gov.au/nationalbiosecurityreform/survey?page=1>

Dear Biosecurity Strategy and Reform Division,

**RE: National biosecurity reform agenda discussion paper**

Thank you for the opportunity to provide comment on the draft National Biosecurity Reform Agenda (the Reform agenda).

Animal Medicines Australia (AMA) is the peak industry association representing the registrants and approval holders of veterinary medicines and animal health products in Australia. They are the local divisions of global innovators, manufacturers, formulators and registrants that supply essential veterinary medicines and animal health products that are critical to supporting Australia's \$40.5 billion livestock industry and 31.6 million pets. Our members represent approximately 80% of registered veterinary medicine sales in Australia.

AMA member companies play a vital role in Australia's biosecurity system as the developers and suppliers of vaccines, anti-infectives and other treatments that prevent, control and respond to animal disease. Ensuring timely access to these tools is fundamental to an effective biosecurity system. Healthy animals are much less susceptible to disease and infection, and good animal health is essential to good animal welfare. Strong biosecurity practices are key to a One Health approach to disease prevention and preparedness for both animals and people.

**In summary, AMA supports:**

- the prioritisation of biosecurity on the national agenda,
- a stronger focus on frontline activities that actively protect Australia's biosecurity,
- the development of a more strategic, nationally aligned approach to biosecurity preparedness, including a national biosecurity data strategy,

- strengthening workforce capability and sustainability beyond government to include veterinarians, animal health professionals, producers and industry stakeholders,
- greater collaboration and engagement with established industry bodies and networks to build strong partnerships and coordination across sectors, stakeholder groups and jurisdictions - locally, regionally and internationally,
- efforts to improve consistency and alignment across biosecurity legislation and regulatory frameworks to reduce Australia's supply chain vulnerabilities, including the review of current policy settings on access to SPF eggs in Australia,
- the development of a sustainably funded, national diagnostic system for notifiable, exotic and emergency animal diseases, similar to that in human medicine, and
- the development of funding models that are predictable and equitable, aligned with risk and benefit, and supportive of long-term system capability.

The proposed long-term reforms for delivery in 2029-32 are also supported, but AMA encourages the government to include this in earlier reform activities, noting the complex, lengthy regulatory process for animal health products.

AMA is pleased to provide the following comments on the National Biosecurity Reform Agenda discussion paper.

### **Importance of maintaining and strengthening Australia's biosecurity systems**

AMA supports the prioritisation of biosecurity on the national agenda with the development and implementation of the new National Biosecurity Strategy (NBS), the Implementation Plan and the Action Plan, to protect Australia from the harmful impacts of exotic and established exotic pests, weeds and diseases. Australia is unique because many of the world's most devastating and debilitating animal diseases are not present here. Strict biosecurity measures and systems help maintain this disease-free status, protecting animal health and welfare, public health, environmental health, food quality and safety, and give Australia a strong competitive advantage in global markets through competitive costs of production, the production of high-quality goods and industry sustainability.

Maintaining this position requires a strong, coordinated and adaptive biosecurity system that is capable of responding to increasing and evolving risks, including climate change, global trade and travel patterns, and supply chain disruptions. An outbreak of animal disease could have severe ramifications for the entire agricultural sector, as well as domestic animal health, food availability and safety, public health and our environment.

A strong and effective biosecurity system is reliant on the following core principles:

- Biosecurity policy and decision-making must be underpinned by science and risk assessment.
- Activities and regulatory responses must be proportionate to the risks posed.
- Effective communication, collaboration and coordination across all levels of the system is essential.
- State, territory and national systems must be aligned, while retaining flexibility to respond to local risks.
- The system must be agile and adaptable to respond to emerging threats and external shocks.

These principles should underpin all aspects of the proposed Reform agenda.

## **General comments**

AMA supports the Government's commitment to strengthening Australia's biosecurity system and recognises that the proposed reform themes broadly align with the key strategic risks facing the system, including workforce constraints, sustainable funding pressures, and regulatory inconsistencies.

However, it is unclear how the Reform agenda directly addresses and mitigates global risk factors and uncertainties, or social license concerns. Provisions that mitigate global risks and uncertainties should be embedded throughout the Reform agenda – and all aspects of the agenda should be viewed through a lens that considers social license risks.

The Reform agenda should be clearly aligned with the existing NBS and associated Implementation and Action Plans. The NBS and associated plans have been developed in consultation with industry and act as an agreed framework to guide actions to implement and strengthen Australia's biosecurity system. Any reform activities should be designed to deliver measurable outcomes that demonstrate genuine improvement to Australia's biosecurity and address the agreed priorities outlined in the NBS framework.

The reform agenda presents an important opportunity to refocus efforts on activities that deliver the greatest biosecurity benefit. In this context, AMA emphasises that biosecurity measures should be targeted to areas of greatest risk, be practical and implementable at the operational level, and designed to minimise unnecessary administrative burden.

Many stakeholders already implement strong biosecurity practices. Reforms should recognise and build on existing biosecurity systems, rather than duplicate them.

A key risk to reform success is the potential for increased administrative complexity without a corresponding improvement in biosecurity outcomes. Resources should be directed towards surveillance, detection, and response capability, rather than compliance-heavy processes that may divert effort from frontline activities.

AMA would encourage a stronger focus on frontline activities that actively protect Australia's biosecurity. There have been multiple consultations in recent years on the new Biosecurity Strategy, Implementation Plan and Action Plan, and now, the Reform Agenda and forthcoming Threat Assessment to support a National Biosecurity Preparedness framework. Participating in these consultations has required considerable resource investment by stakeholders, yet to date has resulted in few visible improvements to biosecurity. Resources need to be focused on realising the many strategies, programs and initiatives described in those documents to deliver tangible and meaningful improvements to Australia's biosecurity systems.

## **Preparedness and prevention**

AMA supports the development of a more strategic, nationally aligned approach to biosecurity preparedness. Nationally coordinated approaches to surveillance and data sharing that promote and value trust and transparency are essential.

Improved surveillance, threat assessment and traceability systems are essential components of preparedness. These systems must be:

- Risk-based and targeted, focusing on the highest priority threats,
- Supported by clear governance frameworks for data collection, sharing and use, and
- Developed in partnership with industry to ensure practicality and uptake.

A nationally coordinated, sustainably funded surveillance and diagnostic testing program will be critical to assist with early detection and containment of any disease outbreaks, and will inform the scope of Australia's biosecurity systems and capabilities. Creating a national biosecurity threat assessment will be a key component of developing a national preparedness framework. AMA welcomes the forthcoming release of the threat assessment in 2026.

AMA suggests that the development of a national biosecurity data strategy is prioritised for action to build and maintain trust among producers, veterinarians and other participants in the system, as well as public confidence. There are significant legal and ethical implications for data collection and sharing, and any expanded data-sharing arrangements will rely on trust and transparency. Stakeholders must have confidence in how data is collected, stored and used, and clarity on their roles and obligations within the system. Early consideration must also be given to the risks and opportunities associated with the use of artificial intelligence within a national surveillance system.

### **Response capability and regulatory agility**

A central component of an effective biosecurity system is the ability to respond rapidly and effectively to an incursion. AMA emphasises that access to veterinary medicines and vaccines is a critical enabler of response capability.

Regulatory settings are an important component of biosecurity that affect a company's ability to maintain business continuity and the capacity to develop and provide critically important veterinary medicines. A regulatory environment that is reliable, efficient and predictable is vital. Disruptions related to the COVID-19 pandemic illustrate the need for flexibility and adaptability in the biosecurity system to mitigate the impacts of external stressors when 'business as usual' may not be possible.

In the event of an exotic disease outbreak, Australia may need to rapidly source vaccines and treatments from international markets. To support this, the regulatory system must support:

- Streamlined import and approval pathways,
- Fast-tracked permit processes, and
- Risk-based flexibility in regulatory requirements during emergencies.

AMA notes that the Reform agenda includes proposed long-term reforms for delivery in 2029-32, including to consider supporting 'the adoption of new technologies within emergency response arrangements to improve eradication.' AMA supports this proposal but encourages the government to include this in earlier reform activities, noting the complex, lengthy regulatory process for animal health products. Creating incentives for investment and innovation, and enabling regulators to prepare guidance material and processes to assess innovative technologies, will facilitate more rapid access to these new technologies. Delays in accessing critical veterinary medicines could significantly impact the effectiveness of a response and increase the scale and cost of an outbreak.

### **Workforce and system capability**

AMA supports the focus on strengthening workforce capability and sustainability. Flexibility and adaptability are needed to ensure the biosecurity workforce is appropriately trained, resourced, connected and integrated to identify, detect and respond effectively and efficiently to both direct and indirect biosecurity threats. Investment in workforce capability should be aligned with operational needs and supported by sustainable funding arrangements.

The biosecurity workforce extends well beyond government agencies. Veterinarians, animal health professionals, producers and other industry stakeholders are all critical components of the

biosecurity system. In many cases, these groups are the first to identify unusual disease activity and initiate response actions.

Importantly, 75% of new and emerging human infectious diseases are zoonotic – meaning that they originate in animals. Declining numbers of veterinarians and support staff across all sectors, including livestock and companion animal clinical practice, research and academia, industry, government and pathology, poses significant challenges not just for biosecurity, but also for animal health outcomes, food security, production and trade.

Concurrently, Australia faces increasing biosecurity threats, including foot and mouth disease (FMD), lumpy skin disease (LSD), African swine fever (ASF) and high pathogenicity avian influenza (HPAI), as well as zoonotic threats from diseases such as Japanese encephalitis virus (JEV).

A robust, sustainable veterinary and animal health network is necessary for preventing, diagnosing and treating animal diseases and protecting human health and food security. Efforts to support and increase the number of veterinarians – particularly in rural and regional areas – are essential to protect Australia's agricultural production and trade sectors, and rural communities.

A national qualified veterinary nurse register, similar to that for registered veterinarians, as well as access to qualified veterinarians via telehealth services would provide valuable resources during management of natural disasters and disease outbreaks. These resources would provide first aid, triage and prioritisation functions, reducing pressure on veterinary services.

Meeting the challenges facing the sector in retaining and maintaining a sustainable workforce, as well as providing better support models for veterinary care will alleviate some of the pressure on veterinary services and support better access to animal health products for Australia's livestock, horses, pets and wildlife.

### **Operational capability, capacity and coordination**

AMA supports efforts to strengthen collaboration and emphasises the importance of engaging with established industry bodies and networks. These organisations play a critical role in disseminating trusted information and facilitating implementation of biosecurity measures, and can provide valuable insights into regional risks, implementation challenges, opportunities and resources.

Effective biosecurity depends on strong partnerships and coordination across sectors, stakeholder groups and jurisdictions – local, regional and international. Communication, transparency and trust are fundamental to ensuring meaningful stakeholder participation and compliance.

Assessing the operational capabilities of the national biosecurity system will be an important first step to identify capabilities and specific activities for prioritised reform and resourcing. Similarly, developing governance arrangements to support data sharing between jurisdictions and stakeholders within existing legislative arrangements is a critical step towards developing strong partnerships and building trust among stakeholders.

The priority must always be to keep exotic animal diseases out of Australia, rather than trying to control or eliminate a disease post-incursion. AMA supports efforts to protect Australia's biosecurity via engagement, monitoring and surveillance overseas to prevent exotic diseases and pathogens from entering Australia. The direct and indirect costs of an emergency animal disease response escalate dramatically once a disease is detected and subsequent eradication may not always be possible.

## **Legislation and regulatory frameworks**

AMA supports efforts to improve consistency and alignment across biosecurity legislation and regulatory frameworks to reduce Australia's supply chain vulnerabilities.

Regulatory settings are critically important to biosecurity. The ability of animal health companies to maintain business continuity and the capacity to develop and provide critically important veterinary medicines depends on a regulatory environment that is reliable, efficient and predictable.

Biosecurity policies must have the capability and flexibility to respond quickly to emerging threats and emergency situations. In the event of an exotic animal disease detection, it is critical that veterinary medicines, can be brought into Australia quickly and efficiently, including medicines that may not be routinely held in Australia and those that are not currently registered for use here.

Policies and regulatory settings should be risk-based and proportionate, minimise duplication and inefficiency, support timely access to veterinary medicines and technologies. Systemic agility is key to fast-track emergency approvals and permits, clear imported medicines quickly through Australian borders, supply effective distribution networks (especially to rural and remote areas) and embed risk-based flexibility in satisfying non-critical regulatory requirements.

Greater harmonisation between international and local jurisdictions and regulators would improve system efficiency and reduce unnecessary burden on stakeholders. For example, the ability to access and accept technical assessments and regulatory information held by other regulators could significantly improve access time to new veterinary medicines in an outbreak situation, thereby supporting rapid delivery of effective disease control and treatment.

As there is little alignment between international and Australian biosecurity policies and regulations, additional resources are required to maintain Australia-specific requirements. These impose significant barriers to registration of new technologies and can mean that new products are not considered viable for our relatively small market (especially compared with the EU and USA). Biosecurity requirements represent a significant barrier to the introduction of innovative immunobiological products into Australia.

For example, specific pathogen free (SPF) eggs are a critical component in the production of human and veterinary vaccines, quarantine monitoring, sentinel programs, diagnostics and biomedical research. Currently, despite a growing demand for vaccines, there is only one supplier of SPF eggs in Australia. There have been multiple examples of shortfalls in local SPF egg supplies, leading to vaccine supply disruptions and posing risks to many critical animal disease control programs.

The requirement to use only Australian-origin SPF eggs applies for both local vaccine production and overseas manufacturing sites of vaccines destined for the Australian market. The necessity to send Australian-produced SPF eggs to overseas production sites represents a significant cost to animal pharmaceutical manufacturers and means that Australia is exposed to significant supply chain vulnerabilities.

Animal Medicines Australia encourages the government to review the current policy settings on access to SPF eggs in Australia with a view to facilitating better access to Australian-equivalent SPF eggs produced overseas.

## **Funding and investment**

Sustainable funding is essential to maintaining an effective biosecurity system and must be prioritised by the Reform agenda. AMA supports the development of funding models that are

predictable and equitable, aligned with risk and benefit, and supportive of long-term system capability.

The agricultural sector is a multi-billion-dollar industry that is critical to Australia's economy. Outbreaks of animal diseases can have catastrophic and far-reaching impacts on animal welfare and agricultural industries, with severe ramifications for the entire agricultural trade sector, domestic animal health, food affordability, availability and safety, public health and the environment.

Investment should prioritise prevention and preparedness, which deliver the greatest overall benefit and reduce the likelihood of costly emergency responses. Research to quantify the value of various biosecurity activities may be helpful for justifying expenditure and to secure consistent, predictable funding – especially for core system elements. Existing emergency response arrangements and deeds (such as EADRAs) should be regularly reviewed to ensure that the costings and governance arrangement remain relevant and appropriate to enable effective responses to disease incursions.

AMA suggests that a sustainably funded, national diagnostic submission and testing system for notifiable, exotic and emergency animal diseases is prioritised, as it is in human medicine. Barriers to testing for vets and farmers, such as cost, convenience and administrative requirements, can strongly influence the number of pathology specimens sent for testing. This can be particularly important in the early stages of a disease outbreak, when opportunities for containment may be time-limited.

### **Concluding remarks**

Australia's biosecurity system is fundamental to protecting animal health, public health, food security, the environment and the national economy. The Reform agenda provides an important opportunity to strengthen the system in a way that is coordinated, efficient and resilient.

AMA emphasises that reforms will be most effective where they are:

- Science-based and risk-proportionate,
- Operationally practical and targeted,
- Supported by strong partnerships and communication, and
- Adaptive to changing risks and conditions.

Ensuring timely access to veterinary medicines and vaccines must remain a central consideration across all elements of the biosecurity system.

AMA welcomes continued engagement as the national biosecurity reform agenda progresses.

Yours sincerely,

*Unsigned for online submission*

Dr Katie Asplin

**Director Animal Health Policy & Engagement**