



SUBMISSION TO THE NATIONAL BIOSECURITY REFORM

Context for response

Southern Queensland Landscapes is a community-driven, independent, not-for-profit organisation with a team of dedicated professionals stationed across three regional offices in Toowoomba, Roma and Charleville. As one of Queensland's 11 natural resource management organisations, we support local communities to actively shape a more sustainable future. Our team brings a wealth of knowledge and experience in sustainable agriculture, soil, water, biodiversity, planning and community engagement. Since 2018, we have been working with community organisations and landholders across our region to develop and implement a range of projects that deliver sustainable environmental outcomes, enabled by science and technology and supported by First Nations' knowledge, that improve the lives of people in regional communities, now and for the future.

We coordinate, connect, and engage with local communities, First Nations people, industry partners, and government agencies to learn from each other and work collaboratively. Our mission is to support landholders in understanding their landscapes, adapting to challenges and becoming excellent stewards of their country.

Spanning 314,398 km², our region covers the Queensland Murray Darling Basin (MDB) including the Paroo, Warrego, Nebine, Condamine Balonne, Moonie and Border Rivers catchments and the Bulloo Catchment west of the MDB. Within this area is 285,661 km² of prime agricultural land, interwoven with 61 National Parks, 56 nature refuges, 109 state forests and 262 unique primary regional ecosystems. These places are home to 1162 animal species, 4309 plant species, 991 fungi species and over 260,000 people within six bioregions. We acknowledge and respect the long held custodianship by the 28 Nations in our region.

Summary of Key Points

This submission responds to the National Biosecurity Reform Agenda Discussion Paper (2026). Southern Queensland Landscapes submits on behalf of landholders, First Nations, local government and community groups across the 314,398 km² Southern Queensland Region.

Overall position:

- Southern Queensland Landscapes strongly supports the reform agenda while urging for explicit recognition of community-based NRM organisations as a trusted, regionally embedded delivery tier within the national biosecurity system.



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Preparedness:

- NRM organisations can provide paddock-scale surveillance, data facilitation and absence-of-risk assurance; would serve well as delivery partners for the on-farm preparedness program from design stage.
- Data-sharing agreements would gain strength from being co-designed with, and sequenced after, trust-building investment through trusted regional intermediaries

Response:

- Trust between land managers and government is the core gap in emergency response — notification incentives must be reformed to address lack of reporting from those most likely to notice issues while they are still manageable.
- Integrated response arrangements are essential; land managers experience biosecurity as a collective set of pressures, not siloed threat categories.

Recovery:

- The fire ant response is the essential reference case: the cost of containment failure (\$45B over 30 years if uncontrolled) dwarfs investment in early, well-resourced recovery.
- Recovery triggers are best set by biological and social risk levels and private land manager obligations must be equitable relative to government's provision of support.
- The National Heritage Trust could be assessed as a recovery funding mechanism delivered through NRM organisations.

Workforce:

- NRM organisations are a natural regional workforce hub for biosecurity — field presence, community relationships and coordination capability are in place.
- Training is most effective when locally accessible, culturally appropriate and addressing regional and surge deployment.

Operational capability:

- Southern Queensland Landscapes can facilitate First Nations knowledge and citizen science integration into biosecurity surveillance now — this is a present-day capability.
- Technology adoption requires trust, training and support in the medium term before adoption is achievable in the long term.

Legislation, regulation and funding:

- Regulatory complexity must be assessed in the context of real capacity constraints on regional businesses and the interaction with other NRM regulatory systems.
- Cost-sharing principles must clarify government versus private sector roles and address the asymmetry between private costs and public biosecurity benefits.

NBS governance:

- NRM Regions Australia should be included in the NBS Implementation Committee; NRM organisations should be formally recognised as engagement intermediaries and monitoring partners.



1. About Southern Queensland Landscapes

Southern Queensland Landscapes is a community-driven, independent, not-for-profit natural resource management (NRM) organisation operating across the 314,398 km² Southern Queensland Region. Our region spans from the Toowoomba Range in the east to the Grey Range in the west, encompassing the Condamine, Balonne, Border Rivers, Maranoa, Paroo and Bulloo catchments and the lands of 28 First Nations.

We were established to coordinate landscape-scale investment, planning and action for the community of Southern Queensland — a term we use inclusively to encompass landholders, First Nations, local governments, industry and community groups. Our work is guided by the Flourishing Landscapes Healthy Communities (FLHC) Plan (2022), a community-developed strategic document that places biosecurity as a foundational enabling thread within an integrated pathway to landscape health, economic resilience and community wellbeing.

Our stakeholders include approximately 245,480 people across and the region is characterised by extensive dryland and irrigated agriculture, significant conservation values, and deep First Nations connection to Country. Agriculture, forestry and fishing dominate the regional economy, with grazing comprising 82.9% of land use. Managing the region's biosecurity, including pest plants and animals that cost Queensland more than \$700 million per year, is integral to our stakeholders' livelihoods and landscape health.

Southern Queensland Landscapes has established trusted relationships at the paddock scale with landholders, First Nations, and community organisations. We are a proven intermediary between Australian Government programs and on-ground outcomes — a capability that is directly material to the reforms proposed in this discussion paper.

Southern Queensland Landscapes is also the author of the Stronger Landscapes: An Emergency Preparedness and Response Plan for Biodiversity and Agricultural Natural Assets in Southern Queensland (Version 7.0, June 2024) — a 200-page, Australian Government-funded operational document delivered under the Natural Heritage Trust through the Commonwealth Regional Delivery Partners Panel. Stronger Landscapes provides the spatial analysis, asset-level risk assessment, and operational planning that directly demonstrates our understanding of the reform agenda. Key findings from this Plan are cited as supporting evidence throughout this submission.

2. Executive Summary

Southern Queensland Landscapes strongly supports the National Biosecurity Reform Agenda and the commitment of Agriculture Ministers to strengthen the sustainability and resilience of Australia's biosecurity system. The reforms proposed in this discussion paper address structural challenges that are directly experienced by our stakeholders and community.

We have five key points of feedback on the reforms:

- It would be of high value to the reform agenda to have NRM organisations explicitly recognised and resourced as a delivery tier within the national biosecurity system. The gap between national policy and paddock-scale action is not a communications problem — it is a structural one. Trusted regional intermediaries with existing relationships, First Nations partnerships, and community networks are the most effective and cost-efficient way to close it.

- Trust is the rate-limiting factor for biosecurity effectiveness. Data sharing, emergency response and on-farm preparedness all depend on land managers trusting the system. Building that trust requires routing engagement through entities that landholders already trust — including NRM organisations.
- Recovery reform needs to go further and faster, and be equitable. The fire ant response has demonstrated the escalating costs of containment failure. Recovery triggers need to go beyond budget exhaustion, and the burden placed on private land managers to achieve public biosecurity outcomes needs to be proportionate to what is expected of government.
- The medium-term reforms underinvest in the enabling conditions for behaviour change. Adoption of new practices does not happen automatically with awareness. Engagement, education and motivation must be explicitly funded in the medium-term (2027-28) reform agenda before adoption can be the long-term (2029-32) target.
- First Nations knowledge and citizen science represent an under-utilised and ready surveillance network. Southern Queensland Landscapes has existing connections to both, and can facilitate their integration into national biosecurity surveillance with appropriate recognition and resourcing.

3. Part 1 — Overall Reform Prioritisation and Sequencing

3.1 Do the proposed reform themes adequately address the strategic risks? (Q1.1)

The seven reform themes broadly address the six strategic risks identified by Agriculture Ministers. Southern Queensland Landscapes particularly endorses the attention given to social licence, operational capability, and workforce — risks that are highly material to our regional context. However, we note two structural omissions:

- The community and NRM sector is absent as a named stakeholder type within the reform architecture. The themes are framed primarily around government, industry and research organisations. The network of community-based NRM organisations that operate at the interface of all these sectors — and who hold trusted relationships with land managers, First Nations and local communities — is not named as a delivery vehicle in any theme.
- The interaction between biosecurity and broader land management pressures (drought, flood, fire, declining community capacity) is not adequately addressed. For our stakeholders, biosecurity is not experienced as a discrete risk category — it is experienced as part of an integrated set of landscape management pressures. Reforms that treat biosecurity in isolation from these co-occurring challenges will underperform.

The Stronger Landscapes EPR Plan documents that in the Southern Queensland Region, drought affects 52% of the landscape, flooding affects 32%, and higher fire-frequency areas cover 20%. These hazards compound directly with biosecurity threats: flooding spreads invasive weeds through river systems; drought weakens pastures and creates vectors for pest invasion; and post-fire landscapes create windows for new pest



and weed incursions. The EPR Plan explicitly models these compound scenarios while the Reform Agenda does not consider this practical reality.

Evidence: Stronger Landscapes EPR Plan (2024)

3.2 Reform prioritisation and sequencing (Q1.2 and Q1.3)

Southern Queensland Landscapes recommends the following sequencing logic, drawing on our on-ground experience:

- Establish funding and cost-sharing principles first (medium-term), as they are a prerequisite for meaningful agreement on all other reform themes.
- Trust-building and engagement infrastructure is needed prior to data-sharing and surveillance reforms. The proposed data-sharing agreements and citizen science integration will not deliver unless land managers trust the system.
- Workforce strategy can begin in parallel with preparedness reforms, rather than sequentially. The workforce needed to deliver the on-farm preparedness program will need to be built during the medium-term phase.
- Recovery framework development (medium-term) can explicitly draw on the lessons of the fire ant response before those lessons are lost.

3.3 Partnership opportunities (Q1.4)

The most significant partnership opportunity within the reform agenda is the formalisation of community-based NRM organisations as a named delivery tier. Southern Queensland Landscapes identifies the following specific partnership opportunities:

- NRM organisations and First Nations ranger groups: Southern Queensland Landscapes works alongside the 28 First Nations of our region and has existing relationships with ranger groups. Formalising these as biosecurity surveillance and early-detection partnerships would rapidly extend detection capability across landscapes that are currently under-monitored.
- NRM organisations and industry bodies: Southern Queensland Landscapes has established working relationships with locally and regionally operating agricultural industry groups. These relationships are the conduit through which biosecurity practice change programs reach land managers.
- NRM organisations and local government: Southern Queensland's regional councils are active partners in our FLHC Plan implementation. NRM organisations are the natural coordination point for local government engagement in biosecurity.
- Cross-border NRM partnerships: The Southern Queensland Region shares biosecurity challenges with adjacent NRM regions in New South Wales. Southern Queensland Landscapes already engages in cross-border collaboration for the Ramsar-listed Narran Lakes and Paroo River Wetlands.
- NRM organisations and the research sector: Southern Queensland Landscapes has existing partnerships with the SQNNSW Drought Hub (University of Southern Queensland), One Basin CRC and Net Zero CRC — research translation experience directly applicable to biosecurity workforce development and technology adoption.



The Stronger Landscapes EPR Plan confirms that Southern Queensland Landscapes is already formally recognised in several Local Government Biosecurity Plans as having key roles in early detection, landholder support, field days, funding opportunities, weed control in environmentally significant areas, and regional planning/funding support for pest management programs. The Plan also documents active participation in the Southern Downs Pest Management Advisory Committee, Queensland Dog Offensive Group, Toowoomba Regional Council Biosecurity Advisory Committee, and Invasive Species Queensland — demonstrating a functioning multi-stakeholder partnership network that the reform agenda could formalise, not recreate.

Evidence: Stronger Landscapes EPR Plan (2024)

3.4 Barriers and risks (Q1.5)

The most significant barrier is the expectation that land managers will participate in data sharing, surveillance, emergency response and preparedness programs without adequate support, incentive or trust. Our stakeholders have experienced significant erosion of trust with government — particularly following the removal of agricultural extension services from communities — and this is a material constraint on biosecurity reform delivery.

A related risk is that the reform agenda defaults to digital and technology-led solutions before the social and community infrastructure required for those tools to be adopted is in place. We highly recommend investment in trusted relationships before investment in platforms.

4. Part 2 — Proposed Reforms by Theme

4.1 Preparedness (Q2.1, 2.2, 2.3)

Southern Queensland Landscapes strongly supports the preparedness reform agenda and which is aligned with our business as usual. Specifically:

- Paddock-scale surveillance and assurance of absence of biosecurity risks is an area of established capability for Southern Queensland Landscapes. Our field presence, trusted relationships with landholders, and coordination role across 314,000 km² position us as a natural partner for regional application of the national preparedness framework.
- The national database uplift for cattle, sheep and goats (medium-term) is welcomed. Southern Queensland Landscapes can help address gaps in uptake and data quality in our region, given our existing relationships with land managers and industry groups.
- Regional NRM organisations are well placed to provide trading partner confidence around containment, control and traceability at the local and regional scale, leveraging existing partnerships with First Nations, local government and industry.
- On the proposed on-farm and business preparedness program (long-term), Southern Queensland Landscapes recommends explicitly including NRM organisations as delivery partners in the design from the outset.

The Stronger Landscapes EPR Plan provides a direct demonstration of preparedness capability: the Plan documents that during the 2023 Southern Queensland bushfires — which impacted 665,540 ha, six times greater than the 2019 Black Summer extent in SEQ — Southern Queensland Landscapes accessed GIS and satellite mapping technology (Sentinel/Copernicus, Queensland Statewide Imagery) to identify fire extent, assess cultural and environmental values within the impacted zone, and map impacts against FLHC Plan assets in real time. The Plan further documents that during the 2021-22 Balonne flooding, Southern Queensland Landscapes led the coordination of landholder engagement to assess flood impacts on biodiversity and agricultural assets, produced a hotspots map, and used this analysis to guide subsequent investment for on-ground repair actions. These are not aspirational future capabilities — they are documented operational responses already delivered.

Evidence: Stronger Landscapes EPR Plan (2024)

Effective data sharing for preparedness requires trust before it requires platforms. Paddock-scale data sharing is currently impeded by uncertainty about how data will be used and by a lack of confidence that government responses will be proportionate and supportive. Routing data collection through trusted regional entities — including NRM organisations — is an effective way to unlock this.

On the sequencing of data-sharing versus trust-building: the medium-term preparedness reforms will be most effective by explicitly including — as a co-equal priority alongside data-sharing agreement development — investment in trust-building through recognised regional intermediaries. The agreements themselves should be designed collaboratively with those intermediaries, and their implementation timed to follow, not precede, demonstrated trust-building progress.

4.2 Response (Q3.1, 3.2, 3.3)

The proposed response reforms are broadly supported. Southern Queensland Landscapes highlights the following:

- The most significant gap in emergency response is not technical — it is the level of trust, communication and cooperation of land managers who will be first responders in any biosecurity incursion. Many land managers currently fear regulatory consequences of disclosure more than the biosecurity threat itself. Reforms must explicitly address this dynamic.
- Integrated response arrangements are strongly supported. Land managers experience biosecurity threats as a collective set of pressures — not as separate animal, plant or environmental events.
- The inclusion of containment and impact management in emergency arrangements (medium-term) is welcomed. Southern Queensland Landscapes recommends this also explicitly address the transition point from active response to recovery, which is currently poorly defined and creates perverse incentives for all parties.

The Stronger Landscapes EPR Plan documents a specific example of effective response coordination: a large anthrax incident on a beef cattle property in the St George area in March 2017 was successfully contained — with the disease prevented in remaining livestock through vaccination and trade maintained at state and national level — demonstrating that rapid, coordinated response on private land, facilitated through trusted local networks, produces effective biosecurity outcomes. The Plan also

documents that response to animal and plant diseases is rated as carrying extreme risk with catastrophic consequences almost certain (moderate confidence) for the region's Species of National Environmental Significance, reinforcing the case for integrated, pre-positioned response capability.

Evidence: Stronger Landscapes EPR Plan (2024)

The proposals do not adequately address digital surveillance or early detection at the landscape scale. Given the size of the Southern Queensland Region and the low density of human occupation, technology-augmented surveillance — including remote sensing, acoustic monitoring and community-facilitated species observation — will be essential for effective detection. This could be addressed in the medium-term operational capability reforms.

4.3 Recovery (Q4.1, 4.2, 4.3, 4.4)

Recovery is the theme where Southern Queensland Landscapes has the strongest concerns about the adequacy of the proposed reforms.

The fire ant response is our reference case for future biosecurity recovery design. The cost of containment failure — measured in decades of eradication effort, billions of dollars, and incalculable environmental and agricultural damage — dwarfs any investment in early and well-resourced recovery. Recovery frameworks ought not be triggered by the exhaustion of response budgets. They are best activated by biological and social criteria, with adequate resourcing from the outset.

Southern Queensland Landscapes makes the following specific recommendations on recovery reform:

- A recovery framework aligned with the National Principles for Disaster Recovery needs to also include biological criteria (e.g. transition from eradication to management) and social criteria (e.g. community and economic impact thresholds) as independent triggers for recovery program activation.
- Equity needs to be built into recovery design. The current implicit expectation that private land managers will absorb biosecurity containment costs in pursuit of public benefit outcomes is unsustainable and inequitable.
- Recovery needs to be integrated into jurisdictional response planning from day one of any new biosecurity incursion, not treated as a post-response phase.
- The National Heritage Trust has potential as a funding mechanism for biosecurity recovery programs, delivered through NRM organisations with their established community relationships, First Nations partnerships and landscape-scale coordination capability.

The Stronger Landscapes EPR Plan provides direct regional evidence for the compound character of recovery needs. The Plan documents that the 2021-22 Balonne flooding produced weed transfers across riverine areas, topsoil loss, and increases in mosquito and sand-fly populations creating public health and biosecurity concerns — all recovery challenges that are simultaneously biosecurity, agricultural, environmental and community wellbeing issues. The Plan also documents that drought conditions (affecting 52% of the Southern Queensland landscape) create increased fire danger and weed

invasion windows that compound post-event recovery challenges. The EPR Plan's explicit framing of recovery as requiring integration with Local Government Disaster Management Plans and the Queensland Strategy for Disaster Resilience 2022-27 directly supports the submission's recommendation for alignment with disaster recovery frameworks.

Evidence: Stronger Landscapes EPR Plan (2024)

On alignment with disaster recovery (Q4.4): Southern Queensland Landscapes strongly endorses alignment with the Disaster Recovery Funding Arrangements. Our community has experienced the interaction between biosecurity threats and natural disasters directly — drought conditions that weaken native pastures and increase weed invasion, flood events that spread aquatic pests and weed propagules, and fire regimes that affect pest animal populations. A recovery framework that treats biosecurity as a standalone system will miss these compounding dynamics.

4.4 Workforce Capability and Capacity (Q5.1, 5.2)

Southern Queensland Landscapes welcomes the attention given to workforce capability and capacity, and endorses the intent to develop a national biosecurity workforce strategy. We make the following observations:

- Biosecurity impacts and recovery are felt at the local and regional scale. A workforce strategy that focuses exclusively on government and research institutions will miss the deployment context where most biosecurity work actually happens — on the land and in regional communities. NRM organisations are a natural fit for housing regional biosecurity workforce capability.
- Southern Queensland Landscapes is in a position to contribute directly to workforce capacity at the local and regional landscape scale — including field surveillance, community engagement, First Nations partnership facilitation, landholder training and knowledge extension.
- The workforce strategy needs to address regional and remote deployment explicitly, including surge capacity planning for incursion response in areas with low population density.
- Education and training pathways will serve best when locally accessible and culturally appropriate. For our stakeholders — including First Nations community members, ageing farmers, and volunteers — programs that require travel to metropolitan centres or are delivered only digitally will not achieve uptake.

The Stronger Landscapes EPR Plan documents that Southern Queensland Landscapes operates with a small but specialist GIS team with over 20 years of NRM experience, an extensive community and industry network, and working relationships with all relevant emergency management agencies including Local and District Disaster Coordination Centres, the Regional Bushfire Advisory Committee, Rural Fire Service, Queensland Parks and Wildlife Service, and all biosecurity advisory bodies active in the region. The Plan further documents that a previous NRM Landcare Program project — with a \$5.3 million investment — delivered 33 field days with 568 participants (50 of whom identified as First Peoples), 28,159 hectares of weed reduction, and 178,980 hectares of pest control and practice change across the Southern Queensland Region. This is a workforce model in operation.

4.5 Operational Capability and Capacity (Q6.1, 6.2, 6.3, 6.4)

This theme is highly material to Southern Queensland Landscapes' operations and our stakeholders' interests.

- First Nations knowledge, citizen science and frontline insights (medium-term data reform): Southern Queensland Landscapes is well connected with First Nations across the region and with community groups that have existing citizen science capability. We can facilitate resources to engage these stakeholders in biosecurity surveillance — this is a present-day organisational capability, not a future aspiration.
- Data sharing from the paddock scale is impeded by lack of trust and uncertainty about government responses. We recommend building trust through alignment with existing trusted entities — such as NRM organisations — that have a proven track record of connecting land managers and paddock-scale action to Australian Government outcome achievement.
- Research and innovation coordination: on-ground adoption is distinct from awareness, and coordinating the translation of research into practice at the landscape scale requires a network of regionally embedded intermediaries, not just a national coordination mechanism.
- The adoption of new technologies (long-term) is only achievable if the conditions for adoption are built in the medium term: trusted relationships, demonstrated value, adequate training and support, and aligned regulatory settings.

The Stronger Landscapes EPR Plan directly addresses the knowledge gaps that underpin the operational capability reforms. Table 9 of the Plan identifies the following specific gaps in the Southern Queensland Region that are directly relevant to the Reform Agenda's surveillance and data reforms:

(1) location data for Species of National Environmental Significance and Threatened Ecological Communities is patchy — a landscape approach was adopted because the species-level data does not exist at sufficient resolution;

(2) knowledge of groundwater system function, especially Great Artesian Basin springs, is limited;

(3) data on the distribution of weeds, pests and diseases at the scale required for predictive modelling is incomplete; and

(4) the impact of cluster fences on biodiversity and landscape health is unknown, despite significant investment in that tool.

These documented gaps make the case for the medium-term operational capability reforms, while also demonstrating that an NRM organisation operating in the region has the institutional knowledge to understand what data is missing and what is needed to fill the gaps.

Evidence: Stronger Landscapes EPR Plan (2024)

The EPR Plan also documents that Southern Queensland Landscapes maintains an ArcGIS Online spatial data platform — the Natural Resource Atlas — continuously updated with NRM, biodiversity, hazard and agricultural asset data, with over 20 years of GIS capability. The Atlas is available to stakeholders in multiple formats and is routinely



used for emergency planning and response. This is exactly the data infrastructure the Reform Agenda's operational capability reforms could be building on, not replicating.

Evidence: Stronger Landscapes EPR Plan (2024)

4.6 Legislation and Regulation (Q7.1, 7.2)

Southern Queensland Landscapes supports the simplification and alignment of regulations at different levels of governance. We make the following specific observations:

- Regulatory reform needs to recognise the real capacity constraints of small and medium agricultural enterprises operating in remote and regional areas, and design compliance pathways that are proportionate and supported.
- The greatest regulatory complexity experienced by our stakeholders occurs at the intersection of biosecurity, vegetation management, water legislation and land use regulation. Reforms that address biosecurity regulatory consistency in isolation will provide incomplete relief.
- Community and industry participation in regulatory design will work best when genuinely co-design, not post-design consultation. Rebuilding trust between policymakers and land managers — explicitly identified in our FLHC Plan as a regional priority — requires that land managers have genuine input into the objectives and design of legislation.

The Stronger Landscapes EPR Plan documents that Southern Queensland Landscapes has coordinated a review of 30 pieces of environmental legislation on behalf of the NRM organisations in Queensland — assessing the potential impact of each on NRM operations. This experience provides direct institutional knowledge of where biosecurity legislation intersects with and is complicated by other regulatory frameworks, including the Biosecurity Act 2014 (Qld), the Disaster Management Act 2003 (Qld), the Aboriginal Cultural Heritage Act 2003 (Qld), the Nature Conservation Act 1992 (Qld), and the Environment Protection and Biodiversity Conservation Act 1999 (Cwlth). This cross-legislative knowledge base is a resource the Reform Agenda could engage.

Evidence: Stronger Landscapes EPR Plan (2024)

4.7 Funding (Q8.1, 8.2, 8.3)

Southern Queensland Landscapes welcomes the commitment to develop national cost-sharing principles and assess alternative funding mechanisms. We offer the following:

- Clarity around the roles of Australian, jurisdictional and local governments in securing public benefit outcomes — and the corresponding expectation around the role of private businesses in investing in production risk mitigation — is essential before cost-sharing principles can be meaningfully negotiated.
- The National Heritage Trust and the National Landcare Program could act as mechanisms for directing biosecurity investment through NRM organisations — proven delivery vehicles with architecture directly applicable to biosecurity outcomes.
- Cost-sharing principles need to account for the asymmetry between private costs and public benefits in biosecurity. Land managers who contain biosecurity threats provide a public good for which they are not currently compensated.

The Stronger Landscapes EPR Plan is itself funded by the Australian Government's Natural Heritage Trust and was delivered by Southern Queensland Landscapes as a member of the Commonwealth Regional Delivery Partners Panel. The Plan's delivery demonstrates that the NHT architecture can support the production of sophisticated, spatially-grounded, multi-stakeholder biosecurity preparedness capability at the regional scale. The plan maps biosecurity risk across 314,000 km², integrates threat assessment using the National Emergency Risk Assessment Guidelines, and produces asset-level preparedness and response actions for 12 landscape types. This is the kind of outcome that cost-sharing principles and NHT funding mechanisms can deliver when channelled through NRM organisations.

Evidence: Stronger Landscapes EPR Plan (2024)

5. Part 3 — National Biosecurity Strategy Implementation (Q9.1–9.7)

5.1 Strategic alignment (Q9.1)

Southern Queensland Landscapes recommends that reform initiatives be organised under the NBS through a combination of national priorities and regionally delivered targeted initiatives. The current architecture — which operates primarily at the national and jurisdictional level — is appropriate for standard-setting, legislation, funding frameworks and research coordination. However, the translation of these national priorities into on-ground outcomes requires a regional delivery layer that is currently under-resourced and under-recognised.

We recommend the next NBS action plan explicitly include NRM organisations as a named delivery partner category within the governance and accountability framework, with associated activities, resourcing and reporting requirements.

5.2 Governance (Q9.2, 9.3)

Southern Queensland Landscapes' observation is that community-based NRM organisations are absent from the governance architecture as a distinct stakeholder type. The NIC includes industry peak bodies, government agencies and research organisations — but not the regional NRM sector that operates at the interface of all these, at the landscape scale.

We recommend that NRM Regions Australia, as the peak body for the NRM sector, be included in the NIC or an equivalent governance mechanism, with a mandate to represent the regional and community biosecurity delivery perspective.

5.3 Engagement (Q9.4, 9.5, 9.6)

Current NBS communication and engagement is primarily directed at peak bodies and government agencies. It does not consistently reach individual land managers, community groups and First Nations in regional and remote areas. Southern Queensland Landscapes recommends:

- NRM organisations should be formally recognised and resourced as engagement intermediaries within the NBS communication and engagement strategy — with funding to translate national biosecurity priorities into regionally appropriate formats and channels.
- First Nations engagement in NBS implementation be led by First Nations, supported by trusted intermediaries, and resourced adequately. The MERI Framework's call for culturally appropriate data collection and its evaluation criterion on First Nations engagement effectiveness both require structural support.
- Biosecurity stress test exercises (proposed long-term) would benefit from inclusion of NRM organisations as active participants, not only observers.

The Stronger Landscapes EPR Plan's First Peoples chapter provides a detailed publicly available framing of First Nations biosecurity engagement obligations for the Southern Queensland Region, noting that acute and chronic climate change impacts — including bushfires, heatwaves, droughts and floods — may widen health inequities for First Nations peoples whose health and wellbeing is underpinned by connection to Country and social relationships. The EPR Plan explicitly recommends a more meaningful and extensive First Nations risk assessment for the Region, acknowledges that the EPR Plan's development timeframe was insufficient for respectful co-design, and commits to learning from knowledge held by Traditional Owners under appropriate intellectual rights and cultural protocols. This is the level of nuance and respect that effective NBS engagement with First Nations requires — and it is completely achievable through trusted regional intermediaries with established relationships.

Evidence: Stronger Landscapes EPR Plan (2024)

5.4 Monitoring and reporting (Q9.7)

The MERI Framework relies heavily on activity-level data and governance body reporting. The measures that are most meaningful to our stakeholders — changes in landholder behaviour, community trust in the biosecurity system, on-ground detection capability, and First Nations participation in Country stewardship for biosecurity outcomes — are not well captured by current activity-level metrics.

We recommend the MERI Framework incorporate community-level and landscape-scale indicators, and that NRM organisations be recognised as data custodians and reporting partners for these indicators. The Southern Queensland Landscapes Natural Resource Atlas — our regional spatial data platform — is one example of the data infrastructure that already exists at the regional scale and could contribute to national monitoring.

The Stronger Landscapes EPR Plan's monitoring chapter confirms that Southern Queensland Landscapes has the data infrastructure to support national MERI requirements: the Natural Resource Atlas is maintained by a specialist GIS team with over 20 years of NRM experience, stores data in GIS and associated geodatabases, is continuously updated as new datasets become available, and is available via ArcGIS Online for real-time stakeholder access. The EPR Plan explicitly anticipates integration of EPR data into Local Disaster Management Plans as a monitoring outcome — a coordination function that demonstrates NRM organisations' capacity to work across planning frameworks as well as maintain independent data custodianship.

Evidence: Stronger Landscapes EPR Plan (2024)

6. Summary of Recommendations

Reform Theme	Southern Queensland Landscapes Recommendation
Preparedness (Q2.1–2.3)	Explicitly include NRM organisations as delivery partners for the on-farm preparedness program and national preparedness framework. Co-design data-sharing agreements with trusted regional intermediaries, sequenced after trust-building investment.
Response (Q3.1–3.3)	Address trust and social licence as preconditions for effective emergency response. Reform notification incentives to remove a motivation toward a lack of reporting dynamic. Ensure integrated response arrangements reflect land managers' experience of biosecurity as a collective set of threats.
Recovery (Q4.1–4.4)	Activate recovery triggers based on biological and social criteria, not budget exhaustion alone. Build equity into recovery design. Draw explicitly on fire ant lessons. Examine the National Heritage Trust as a funding mechanism for recovery programs delivered through NRM organisations.
Workforce (Q5.1–5.2)	Include NRM organisations as a regional workforce hub for biosecurity. Address regional, remote and surge deployment explicitly. Design training to be locally accessible and culturally appropriate.
Operational Capability (Q6.1–6.4)	Formally recognise NRM organisations as the facilitation layer for integrating First Nations knowledge and citizen science into surveillance. Build trust-based data governance before deploying data platforms. Include enabling conditions for technology adoption in medium-term reforms.
Legislation & Regulation (Q7.1–7.2)	Recognise real capacity constraints of regional businesses in compliance design. Address the interaction between biosecurity and other NRM regulatory systems. Ensure community participation is genuine co-design, not post-design consultation.
Funding (Q8.1–8.3)	Clarify government versus private sector roles before setting cost-sharing principles. Examine National Landcare Program and National Heritage Trust as delivery mechanisms through NRM organisations. Address the asymmetry between private costs and public benefits in biosecurity.
Partnerships (Q1.4)	Formalise NRM organisations, First Nations ranger groups, local governments and cross-border NRM networks as named delivery partners. Leverage existing research partnerships as a model for research translation into biosecurity practice.
NBS Governance (Q9.1–9.7)	Include NRM Regions Australia in NIC governance. Formally recognise and resource NRM organisations as engagement intermediaries, delivery partners and monitoring custodians for landscape-scale indicators within the NBS framework.

7. Closing

Southern Queensland Landscapes and the communities we serve are deeply invested in the success of the National Biosecurity Reform Agenda. Our region is one of Australia's most significant landscapes for agricultural production, biodiversity and First Nations cultural heritage — and it is a landscape that is acutely vulnerable to biosecurity threats amplified by drought, flood, fire and climate change.

We believe the proposed reforms can deliver transformative improvements to biosecurity outcomes — but only if the reforms invest in the trusted relationships, community infrastructure and regionally embedded capability that make national frameworks work in practice. Southern Queensland Landscapes stands ready to contribute to the design and delivery of these reforms, and we welcome the opportunity for further engagement with the National Biosecurity Committee.

Annex A — The Stronger Landscapes EPR Plan: A Case Study in NRM Operational Capability

The Stronger Landscapes: An Emergency Preparedness and Response Plan for Biodiversity and Agricultural Natural Assets in Southern Queensland (Version 7.0, June 2024) was funded by the Australian Government's Natural Heritage Trust and delivered by Southern Queensland Landscapes as a member of the Commonwealth Regional Delivery Partners Panel. It is cited as supporting evidence throughout this submission. This Annex summarises its key features and relevance to the National Biosecurity Reform Agenda.

Plan Overview

The EPR Plan is a 200-page operational document covering the 314,398 km² Southern Queensland Region. It maps and risk-assesses biodiversity and agricultural natural capital assets against five emergency scenario types: wildfire, flooding, drought and heatwave, pest plant and animal invasion, and outbreak of new plant and animal diseases. It employs the National Emergency Risk Assessment Guidelines (NERAG) as its risk assessment methodology — the same national framework that applies to biosecurity emergency preparedness.

Asset Coverage

The Plan covers two asset categories directly relevant to biosecurity reform:

- Biodiversity assets: including 16 priority Species of National Environmental Significance (SNES) under the Threatened Species Action Plan 2022-32 (including Critically Endangered species such as the Northern Hairy-nosed Wombat, Swift Parrot and Plains-wanderer); 14 Threatened Ecological Communities; Ramsar wetlands (including Currawinya Lakes); World Heritage Areas (Gondwana Rainforests); and Great Artesian Basin spring communities.
- Agricultural natural capital assets: including intensive cropping priority areas, grazing lands (covering 82.9% of land use), intensive animal production and forestry — the full scope of agricultural biosecurity exposure in the Southern Queensland Region.

Hazard Coverage and Spatial Analysis

The Plan maps seven spatially identified hazards (Table 5 of the EPR Plan):

- Drought (more than 30% of time): 52% of the Southern Queensland Region — 16.2 million hectares
- Floodplains and buffer zones: 32% of the region — 10.1 million hectares
- Higher fire frequency: 20% of the region — 6.2 million hectares
- Bare ground (top 20%): 20% of the region — 6.3 million hectares
- Severe winds: 19% of the region — 5.8 million hectares
- Bushfire prone vegetation: 1% of the region — 459,542 hectares

These hazards are spatially intersected with asset locations to produce priority EPR landscapes — a methodology directly applicable to the Reform Agenda's preparedness and surveillance priorities.

Demonstrated Operational Response Capability

The Plan documents two major recent operational responses:

- 2023 Southern Queensland Bushfires (665,540 ha — 6x the 2019 Black Summer SEQ extent): Southern Queensland Landscapes deployed GIS and satellite mapping to identify fire extent, assess cultural and environmental values, and map impacts against the FLHC Plan in real time.
- 2021-22 Balonne River Flooding: Southern Queensland Landscapes led landholder engagement to assess flood impacts on biodiversity and agricultural assets, produced a hotspot analysis, and used this to guide on-ground investment for recovery actions.

Partnership and Governance Network

The Plan documents formal or active operational relationships with: Local and District Disaster Management Groups across Southern Queensland; Queensland Fire and Emergency Services; Queensland Parks and Wildlife Service and Partnerships; Rural Fire Service; Regional Bushfire Advisory Committee; Department of Agriculture and Fisheries (Biosecurity Queensland); Southern Downs, Toowoomba Regional and Balonne Shire Councils; Southern Downs Pest Management Advisory Committee; Queensland Dog Offensive Group; and Invasive Species Queensland.

Identified Knowledge and Data Gaps Relevant to Reform Agenda

Table 9 of the EPR Plan identifies documented knowledge and data gaps that directly map to the Reform Agenda's operational capability and surveillance reforms:

- Location data for SNES and Threatened Ecological Communities is insufficient for a species-level approach across the region's large, sparsely monitored landscapes.
- Data on the distribution of weeds, pests and diseases at predictive modelling resolution is incomplete.
- Knowledge of groundwater system function, particularly Great Artesian Basin springs, is limited.
- Understanding of feral animal (pig, wild dog, cat) behaviour and movement at the landscape scale is insufficient for targeted, cost-effective prevention of new incursions.
- Data on climatic threats to identified assets (severe storms, heatwaves) is assessed with low to medium confidence.

These documented gaps provide the evidence base for the Reform Agenda's investment in surveillance infrastructure, data sharing, and citizen science integration — and identify Southern Queensland Landscapes as an organisation that understands what data is missing and has the institutional capacity to help fill it.