

Industry Update: ToBRFV, the PCA Food Security Foundation, and Building Codes

Protected Cropping Australia | Chair's update | September 2026

Summary

More than a year after eradication of tomato brown rugose fruit virus (ToBRFV) was determined to be no longer technically feasible, growers still lack a clear account of the management arrangements that followed. The National Management Group (NMG) agreed on 29 May 2025 that eradication was no longer technically feasible, and all remaining eradication activities under the Emergency Plant Pest Response Deed (EPPRD) were formally stood down on 22 September 2025. PCA has been advised that the proposed national management plan was abandoned without being implemented, and management instead moved to individually controlled state-by-state arrangements, with no clear national plan. This change and its implications have not been communicated clearly or transparently to growers. State-led arrangements can respond to local circumstances, but clearer communication, consistency and practical coordination are still needed. PCA will continue working with the Department of Agriculture, Fisheries and Forestry (DAFF), Plant Health Australia (PHA), state governments and growers towards proportionate biosecurity, workable market access and reliable, affordable fresh produce.

PCA has used the past year to strengthen the sector's position. The most significant step is the formation of the PCA Food Security Foundation, a separately governed charity intended, once endorsement is confirmed, to receive tax-deductible gifts and fund the research, plant health capability, skills and market development that protected cropping needs. Growers will be asked to support it, but the Foundation is expected to be most attractive to industry suppliers, corporations, philanthropic bodies and high-net-worth families, and most of its funding is expected to come from those who back the industry and national food security rather than from growers themselves. Together with our re-application to PHA and the EPPRD voluntary payment mechanisms the Minister has asked DAFF to discuss with us, the Foundation is central to PCA's proposed constructive pathway to full PHA membership and EPPRD participation, so that protected cropping can become a contributing participant in the national biosecurity system with a seat at the table when decisions affecting our growers are made. Our goal is for protected cropping to be recognised as a category under the Deed, covering non-levied crops grown under protected cropping methods and structures, subject to agreed Deed arrangements. Greenlife Industry Australia's EPPRD participation for production nurseries is a relevant precedent, although PCA's arrangements remain to be agreed. The contribution we propose is proportionate: the same biosecurity levy rate capsicum growers already pay, 0.025% of sales, or \$25 for every \$100,000 sold.

The past year has also been one of the most active in PCA's history. PCA has lodged more than a dozen formal letters, submissions and applications with governments and agencies, met

officials in Canberra on 18 June 2026 after the Minister directed her advisers to engage, and followed up in writing. Progress has been slower than growers need: DAFF's most recent reply, 63 days after PCA's July letter, was an interim note, and PCA's detailed response of 14 September 2026 is still awaiting a reply. Administrative requirements and delayed responses have slowed progress, and PCA remains committed to working collaboratively with DAFF, PHA and its members on a workable outcome. In Queensland, a Right to Information request for the ToBRFV test results and communications behind that state's restrictions was declined for processing 301 days after it was lodged.

This update also reports on PCA's advocacy with the Australian Building Codes Board (ABCB) on the National Construction Code (NCC) for high-technology glasshouses.

1. ToBRFV: where things stand

From eradication to national management: progress update needed

ToBRFV was first detected in South Australia's Northern Adelaide Plains in August 2024, followed by Victoria in January 2025 and a separate detection in New South Wales in July 2025 that could not be linked to the South Australian or Victorian sites. After the NMG's decision of 29 May 2025, industry was told that eradication had ended, and that a national management approach would follow.

Twelve months after the eradication response was stood down, growers still have not received a finalised national management framework. The information available to growers does not explain what replaced the response, who is leading it, how decisions are being made, or how industry can contribute. Changes communicated to growers have been state-based, most notably New South Wales' revised ToBRFV Control Order of June 2026, which NSW describes as a transition from emergency response to long-term management and part of the broader shift towards a nationally consistent management approach.

The cost to growers

The financial impact has been severe. By March 2025, losses to the Australian tomato industry already exceeded \$30 million, tens of thousands of productive plants and millions of kilograms of edible fruit had been destroyed, and approximately 750 workers had been stood down. The restrictions continue today. One Victorian site remains unable to access the Queensland market and is reportedly unable to direct up to 20,000 trays a week into that state. The issue is not that the produce cannot be sold; it is that the grower cannot compete in Queensland or access the full range of market opportunities available to others.

More than a year after the move away from eradication, PCA is seeking the evidence underpinning these restrictions and a proportionate review of their continuing need and market impacts. Clear explanations are also important to maintaining trust. Growers are telling us that reporting a suspected incursion can create significant commercial consequences without clear information about the process that follows. Addressing that uncertainty would support the early reporting on which effective biosecurity depends.

State-based controls

Each jurisdiction is running its own controls. South Australia has been certified free since 3 October 2025, New South Wales recognises the pest as no longer present, and Queensland, Western Australia, Tasmania, the Northern Territory and the ACT remain free. Victoria still lists one affected property and has published no update on its situation since May 2025. The table below draws on state and territory government websites as at 25 September 2026, together with arrangements as best understood by PCA between June and July 2026.

Jurisdiction	Status	Current arrangements
Queensland	Free	Movement Control Order reissued 16 March 2026 restricting all ToBRFV carriers into the state. Recognises Area Freedom Certificates issued by NSW and South Australia. At least one Victorian site remains unable to access the Queensland market.
New South Wales	Recognised as absent (pest no longer present)	Revised Control Order (June 2026) with two entry pathways: Area Freedom Certificate, or testing and inspection. Seed testing, crop inspection within six weeks of harvest, labelling, traceability and two-year record keeping. Soil, vehicles, used equipment and coverings no longer regulated; Plant Health Certificates and Plant Health Assurance Certificates no longer required.
Western Australia	Free	Own import requirements on all host fruit, seed and nursery stock from any state where the virus is known to occur.
Tasmania	Free	Emergency General Biosecurity Direction preventing movement of host material from affected states.
Northern Territory	Free	Control Notice (NT Gazette G18, 4 September 2025) restricts tomato, capsicum and chilli plants, seedlings, rootstock and tissue culture (not fruit or seed) from any jurisdiction with a detection. Entry requires an Area Freedom Certificate, a plant health or interstate assurance certificate, or a permit.
ACT	Free	ACT Government confirms the Territory remains completely free (page updated 27 July 2026). No ToBRFV control declaration is currently in force.
South Australia	Free (Area Freedom)	Last detection March 2025. Control orders on the four affected properties were not renewed after 29 August 2025, as PIRSA moved from regulatory

Jurisdiction	Status	Current arrangements
	Certificate issued 3 October 2025)	containment to industry-led biosecurity; each business completed destruction, disposal and decontamination. Freedom was based on more than 200,000 samples across 109 properties. Market access protocols remain, and growers needing sampling for interstate trade lodge an Intent to Export form with PIRSA.
Victoria	One affected property; rest of state free	Detected January 2025 in seedlings moved without authorisation from an infected SA property; replacement seedlings from a NSW nursery also tested positive in May 2025. Managed under property-level quarantine and decontamination. Agriculture Victoria's situation page has not been updated since 30 May 2025 and gives no current status for the property. Entry into Victoria (Condition 52) requires an Area Freedom Certificate, origin from a property not under official control, or a permit.

Key dates

Date	Event
August 2024	ToBRFV detected in South Australia (Northern Adelaide Plains). PCA convenes an emergency meeting of growers and stakeholders.
September 2024	PCA applies for Plant Industry Membership of PHA and to join the EPPRD.
27 November 2024	PCA presents to PHA members seeking EPPRD membership, or interim observer status.
January 2025	PCA's membership application is not supported by existing PHA members at that time.
14 January 2025	ToBRFV detected at a glasshouse in northern Victoria, in seedlings moved from an infected South Australian property (announced 17 January).
17 March 2025	PCA signs a Tripartite Cost Agreement with TG Public Affairs and Hamilton Locke, capping legal and advocacy costs at \$177,000 (excl. GST).

Date	Event
29 May 2025	NMG agrees eradication of ToBRFV is no longer technically feasible.
July 2025	NSW confirms a separate detection not linked to the SA or Victorian sites.
22 September 2025	All remaining eradication activities under the EPPRD formally stood down.
16 March 2026	Queensland reissues its Movement Control Order restricting all ToBRFV carriers into the state.
12 May 2026	PCA writes to Minister Collins on its PHA re-application and critical infrastructure recognition.
Late May 2026	Minister Collins replies (ref MC26-001309), asking DAFF to discuss EPPRD voluntary payment mechanisms with PCA.
29 June 2026	PCA writes to the Department of Home Affairs seeking to expand the definition of critical food and grocery assets under the SOCI Act.
9 July 2026	NSW notifies its revised ToBRFV Control Order (June 2026), replacing the 2024 Order.
10 July 2026	PCA writes to DAFF (Stephen Quilkey, David Gavin) and PHA (Lucy Tran-Nguyen) seeking a meaningful update to growers and a group meeting in Canberra.
11 September 2026	DAFF advises it has followed up with the relevant committee and will respond further.
18 September 2026	Summary released of PCA's webinar with Achmea and Hagelunie on Canada's ToBRFV experience.

What PCA is doing

PCA has formally represented affected protected cropping growers throughout the outbreak, but it remains outside the EPPRD and NMG decision-making structures. Since the eradication response was stood down, our advocacy has focused on three requests: an explanation of what occurred after the last public announcement to move to management and form a national management plan; a clear update on current management arrangements and who is coordinating them; and a date by which industry can expect meaningful communication. An interim briefing note would help growers while the national arrangements are clarified.

The level of activity behind that effort has been sustained. Since the first detection in August 2024, PCA has lodged more than a dozen formal letters, submissions and applications with ministers, departments and agencies across the Commonwealth, Victoria and Queensland,

funded a capped legal and advocacy program, met officials in Canberra, pursued a Right to Information request in Queensland, and begun forming the Foundation and the PHA pathway described in Parts 2 and 3. All of this has been done by a volunteer board and a small part-time team. The table below summarises the main actions.

Date	PCA action	Directed to
August 2024	Emergency meeting of growers and stakeholders convened on detection in South Australia	Industry
September 2024	Application for Plant Industry Membership of PHA and to join the EPPRD	PHA
27 November 2024	Presentation seeking EPPRD membership or interim observer status	PHA members
17 March 2025	Tripartite Cost Agreement signed; legal and advocacy program capped at \$177,000	TG Public Affairs, Hamilton Locke
2 April 2025	Letter on the ToBRFV outbreak and response	Hon Ros Spence MP, Victorian Minister for Agriculture
4 April 2025	Letter on the ToBRFV response	Justine Saunders, DAFF
17 April 2025	Letter on the ToBRFV response	Hon Julie Collins MP
29 April 2025	Formal request to amend the EPPRD	Hon Julie Collins MP
2024–25	Letters on the response, representation and Queensland's stance	Hon David Littleproud MP; Beth Jones, CEO Agriculture Victoria; NFF Horticulture Council; DAFF and Minister Collins (joint letter on Queensland)
19 August 2025	Right to Information application for ToBRFV test results and communications	Queensland Department of Primary Industries
22–23 September 2025	Resubmitted and clarified RTI scope (digitally held records only)	Queensland Department of Primary Industries
12 May 2026	Letter on PHA re-application and critical infrastructure	Hon Julie Collins MP

Date	PCA action	Directed to
18 June 2026	Meeting in Canberra with Stephen Quilkey, arranged following the Minister's direction	DAFF and the Minister's office
29 June 2026	Request to expand critical food and grocery assets under the SOCI Act	Department of Home Affairs
10 July 2026	Letter seeking a grower update and a group meeting in Canberra	DAFF (Stephen Quilkey, David Gavin) and PHA (Lucy Tran-Nguyen)
16 July 2026	Confidential briefing on the Foundation	Hort Innovation
August–September 2026	Foundation board paper, Board consideration and two rounds of confidential grower review	PCA Board and growers
14 September 2026	Reply setting out the growers' position in full	DAFF (David Gavin)
18 September 2026	Webinar and media release on Canada's ToBRFV experience	Industry, with Achmea and Hagelunie

Earlier in the response, PCA engaged TG Public Affairs and Hamilton Locke under a Tripartite Cost Agreement signed on 17 March 2025. Legal and advocacy costs were capped at \$177,000 (excluding GST), made up of \$60,000 for the lobbyist, \$77,000 for Hamilton Locke and a \$40,000 contingency, funded by contributing growers and industry members.

Slow progress, continued engagement

PCA's correspondence over the past four months shows that progress remains slow. On 12 May 2026 PCA wrote to Minister Collins. Her office responded through her policy adviser, Stephen Quilkey, directing her Horticulture and Biosecurity advisers to meet with PCA, and the Minister's formal reply (ref MC26-001309) asked her department to contact PCA about funding arrangements under the EPPRD, particularly voluntary payment mechanisms. On 18 June 2026 PCA met Stephen Quilkey in Canberra. PCA agreed to keep that discussion confidential and will continue to respect that. It can say that commitments were made and that, more than three months later, PCA is still seeking a timetable for their implementation.

On 10 July 2026 PCA put its requests in writing to Mr Quilkey, David Gavin (DAFF) and Lucy Tran-Nguyen (PHA), seeking a meaningful update for growers and a group meeting in Canberra. The next written reply came 63 days later, on 11 September 2026, when Mr Gavin advised that he had followed up progress with the relevant committee and would reach out again the following week, and asked whether PCA had any news to share, including on state trade. This points to a need for clearer two-way information: government is seeking updates on state trade, while industry has been seeking an update on the national framework for more than a year. PCA replied in full on 14 September 2026, copying Mr Quilkey and Ms Tran-Nguyen. The follow-up



flagged for the following week had not been received at the time of writing, and PCA is still awaiting a response from DAFF and PHA.

PCA has written, met, followed up, briefed the Minister's office and brought forward practical solutions. Growers continue to experience administrative delays across multiple jurisdictions, committees and agencies, and PCA appreciates the efforts of the officials it works with. Industry was told that eradication had ended and a national management approach would follow. Growers still need visibility of that framework and of who is leading it, and PCA will keep working constructively until they have it. PCA's objective is to support government-grower collaboration on proportionate biosecurity, transparent decisions, investment and food security.

PCA's response to DAFF

PCA's reply to Mr Gavin, sent by email on 14 September 2026, is a restated account for this update, reproduced verbatim. No response had been received at the time of writing.

From: Andrew Tout, Chair, Protected Cropping Australia Limited <chair@protectedcropping.net.au>

To: David Gavin, Assistant Secretary, Biosecurity Response and Reform, Department of Agriculture, Fisheries and Forestry

Cc: Stephen Quilkey, Department of Agriculture, Fisheries and Forestry; Lucy Tran-Nguyen, Plant Health Australia

Sent: Monday, 14 September 2026, 2:32 PM

Subject: RE: ToBRFV Industry Update Request and Ongoing PCA Initiatives [SEC=OFFICIAL]

Hi David,

Yes, what growers need now is firstly an explanation of what occurred after the last public announcement to move to management and form a national management plan as well as a clear update on current management arrangements, who is coordinating them, and when industry can expect meaningful communication. Even an interim explanation or briefing note would be preferable to continued silence.

The frustration from growers is not difficult to understand. Industry was told eradication had ended, a National Management Group had been established, and a national management approach would follow. Almost 12 months later, growers still have zero visibility on what replaced the response, who is leading it, how decisions are being made, or how industry can contribute.

What was expected to be a coordinated national framework now appears to be a patchwork of state-based arrangements, with zero communication on how or why that transition occurred.

Meanwhile, the impact on growers continues. One Victorian site remains locked out of the Queensland market. The issue is not that the produce cannot be sold, but that grower is prevented from competing in Queensland and therefore from accessing the full range of market opportunities available to others reportedly being unable to direct up to 20,000 trays per week into Queensland.

More than a year after the move away from eradication, these restrictions are becoming increasingly difficult to justify and risk being seen as barriers to fair and open competition rather than proportionate biosecurity measures.



Just as importantly, trust needs to be rebuilt. We are hearing growing concern that reporting a suspected incursion can create significant commercial consequences, without confidence in what follows. Whether justified or not, that perception undermines the early reporting (or even reporting at all) that effective biosecurity relies upon.

I appreciate your efforts personally and look forward to hearing the outcome of the committee's discussions.

Regards

Andrew Tout

Chair, Protected Cropping Australia Limited

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Queensland's Right to Information request

On 19 August 2025 PCA lodged a Right to Information application with the Queensland Department of Primary Industries for all ToBRFV test results and internal and interstate communications on the virus and the response, particularly trade restrictions and positive results or results reported as false positives, from July 2024. PCA narrowed the scope on 26 August 2025. On 22 September 2025 the Department issued a notice under section 41 of the Right to Information Act 2009 (Qld), estimating that around 7,700 pages were responsive and that processing would take about 2,246.5 hours. PCA resubmitted the request the same day and clarified it on 23 September 2025, limiting it to records already held digitally and pointing to the Department's own commitments to digital record keeping and transparent information sharing in the Queensland Biosecurity Strategy 2024–2029.

The Department then took almost nine months to decide, and on 16 June 2026, 301 days after the application was received, it declined to process the request on the grounds that the narrowed scope would not reduce the processing time. Following the extended process, PCA decided not to pursue a further review. The outcome leaves the requested evidence inaccessible to growers. PCA continues to seek a clear explanation of the basis for Queensland's restrictions and how they are reviewed, consistent with the Act's objectives of openness and accountability.

Lessons from Canada

On 18 September 2026 Achmea Farm Insurance released a summary of PCA's recent webinar, hosted in partnership with Achmea and Hagelunie, featuring Guido van het Hof, President of Great Northern Hydroponics in Ontario. His business experienced a serious ToBRFV outbreak across a 28-hectare facility, with clean-up costs estimated at close to \$3 million before the production gap from replanting. Some previously strong Canadian growers were moved into special credit arrangements after two or three affected crops.

Great Northern responded by testing seed, requiring propagators to test plants at several stages, and building an in-house qPCR laboratory for around \$35,000 to \$40,000. That cut the cost per sample from about \$80 to around \$6 and delivered same-day results, compared with

two to three weeks or longer through overwhelmed external laboratories in 2020. The message for Australian growers is that prevention and testing speed are business risk tools, not just compliance obligations.

2. The PCA Food Security Foundation

Why the new direction

The Foundation began as the concept of a voluntary industry fund to support research, biosecurity, industry development and other strategic priorities. Legal, governance and tax advice changed the design. PCA itself cannot become a deductible gift recipient, because advocacy, representation and member services are not eligible purposes. The Collective Industry Fund instrument explored with Hort Innovation was also found to be unsuitable for this structure, because it is built around a single product class collected at first point of sale, whereas protected cropping is a production system spanning many crops.

The preferred structure is therefore a separately governed charitable foundation operating alongside PCA. PCA continues as the peak body for advocacy, representation and member services, while the Foundation attracts and deploys funding for public-benefit work. The model is well established: the Crawford Fund, the Foundation for Rural and Regional Renewal and the McGarvie Smith Institute all operate this way. It matters because deductibility can help build a standing source of funding rather than a one-off subscription, and a credible, independently governed vehicle gives government, research and philanthropic funders the confidence to support the sector.

What it will fund

The Foundation exists to fund the research, plant health capability, skills and knowledge that Australian protected cropping needs to keep producing reliable, affordable fresh food, and that is not adequately covered by existing funding sources. Following grower feedback it now has five priority areas, chosen because they fall outside or between existing levy programs:

- Glasshouse energy, the largest and most volatile cost in protected cropping.
- Automation and artificial intelligence, including climate control, crop monitoring, yield prediction and robotics.
- Controlled-environment workforce and training, including pathways, accreditation and practical training.
- Plant health capability: surveillance, diagnostics, preparedness and response for ToBRFV in tomato, cucumber green mottle mosaic virus (CGMMV) in cucurbits, and future pest incursions we have not named yet.
- Market research and market development, covering domestic market models and the identification and development of new export markets.

Two commitments are firm: The Foundation will not substitute for levy investment, and everything it funds will be published and made available to every grower, whether they contribute or not.

Who is expected to contribute

The Foundation's strongest appeal will be to organisations and individuals who want to support Australian protected cropping and national food security but are not growers themselves.

Because gifts are intended to be tax-deductible once endorsement is confirmed and everything the Foundation funds will be published for the whole sector, it is expected to be most attractive to industry suppliers, corporations, philanthropic bodies and high-net-worth families. Growers will be asked for their support, but PCA expects most of the Foundation's funding to come from these supporters of the industry and food security rather than from growers themselves.

How contributions will work

Contributions are voluntary gifts made through a pledge, intended to be tax-deductible once endorsement is confirmed, rather than a levy or fee. For growers who choose to contribute, the draft tiers are expressed as a recognised contribution target, **with Platinum at 0.50% of turnover, Gold at 0.25% and Silver at 0.10%**, plus a fixed-amount Supporter tier. A key concern in grower review came from businesses in levied crops, which already contribute well over \$100,000 a year through the statutory vegetable levy. The model now deducts a business's statutory levy from its recognised target, so a levied grower is never asked to contribute more in total than an unleveled business of the same size, subject to a minimum pledge that is still to be set. The worked examples below use the Platinum target and turnover as the base.

Business	Platinum target (0.50%)	Statutory levy already paid	Pledge sought
\$20m turnover, no levy	\$100,000	Nil	\$100,000
\$20m turnover, pays \$100,000 levy	\$100,000	\$100,000	Minimum pledge only
\$5m turnover, pays \$10,000 levy	\$25,000	\$10,000	\$15,000
\$5m turnover, no levy	\$25,000	Nil	\$25,000

The contribution base itself is voluntary and still open for discussion. Turnover can place a disproportionate burden on high-turnover, capital-heavy, thin-margin glasshouses, so turnover net of statutory levies, hectares under cover and self-selected bands are all being tested with growers before anything is fixed. For scale, the July 2026 board paper illustrated that a sector of around \$2 billion contributing 0.5% would raise about \$10 million a year. That figure is illustrative only.

Governance

The Foundation will have its own board. The draft board has nine seats with an independent majority: two PCA nominees, two working grower directors, an independent chair, a research and science seat, a plant health seat, and two seats for finance and public policy. Three appointment options are being tested with growers: PCA appoints all nine directors; members

elect the two grower director seats; or the membership ratifies the board at the AGM. Levied vegetable crops will be represented on the research and plant health committee from the outset, donations will sit in a ring-fenced gift fund with its own ledger and audit, and anything involving PCA will be approved by directors with no PCA connection.

Progress and next steps

The PCA Board has resolved to establish the Foundation and has committed \$15,000 to do so. Hamilton Locke, who acted for the industry through the ToBRFV outbreak, has agreed to complete the legal formation for a fixed fee of \$15,000, with payment deferred until after the next conference. The draft strategy and grower briefing pack have been through the Board and two rounds of confidential grower review, and the revised drafts went to Hamilton Locke on 25 September 2026 for advice on the levy offset, restricted-purpose gifts, in-kind founding contributions, board appointment and contributor recognition.

We are working to a staged implementation sequence across six phases: formation; charity registration and endorsement; governance and consultation; a quiet soft launch with founding contributors and a first funded program; a public launch at the next PCA conference; and then scale. Endorsement is the critical path, because no tax-deductible gift can be receipted until it is confirmed. Formation work is under way, no funds have yet been raised and no programs committed, and members will be consulted through an information forum before the public launch.

3. A pathway to PHA membership and a seat at the table

Why representation matters

PCA first applied for Plant Industry Membership of PHA and to join the EPPRD in September 2024, and presented to PHA members on 27 November 2024 seeking membership or interim observer status. The existing membership did not support the application in January 2025, and as a result the decisions that shaped the ToBRFV response, including the 29 May 2025 decision to end eradication, were made without PCA representation except through relentless targeted lobbying by PCA with the assistance of TG public Affairs. That outcome has helped PCA understand how the system works, what members need to see, and our re-application is being built to meet those expectations. Full membership, together with EPPRD participation, would provide representation in biosecurity decision-making and a place in the cost-sharing framework. Eligibility for Owner Reimbursement Costs would depend on the Deed's requirements for defined costs, losses and response activities, rather than follow automatically from membership – it is clear however that re-imbursement wouldn't cover anywhere near the level of individual commercial damage inflicted on the glasshouses impacted by the virus hence taking the additional precaution of implementing the Foundation strategy.

PCA represents a production system rather than a single commodity: tomatoes, capsicums, cucumbers and leafy greens under glass, berries under tunnels, and netted permanent tree crops. Greenlife Industry Australia provides a relevant similar precedent, as an EPPRD signatory representing production nurseries, including propagation of seedlings under protected

cropping structures for tomatoes, capsicums, cucumbers, flowers and other crops. In tomatoes alone, PCA's growers produce nearly 40% of Australia's output, valued at approximately \$370 million at the farmgate in 2022/23 (RaboResearch data). These are among the most capital-intensive food production assets in Australia, at up to \$35 million per hectare, and the Two Wells and Virginia region in South Australia alone has more than 1,000 hectares under cover generating more than \$355 million in annual farmgate value.

Our goal: protected cropping recognised as a category under the Deed

PCA proposes recognition of protected cropping as a category under the EPPRD, rather than one crop at a time through a single-crop levy, such as for tomatoes. Greenlife Industry Australia's nursery representation is a relevant precedent for a multi-crop sector; it does not establish that PCA's arrangements are agreed. Protected cropping produces many different crops and continues to expand as new crops move under cover. PCA is seeking coverage for any crop grown using protected cropping methods or structures that is not currently levied, with the scope and eligibility to be agreed under the Deed as the sector evolves, rather than addressing coverage only after an incursion.

Working with the system

The path to membership has been slow and requires coordination across PHA's existing members, the Deed's signatories, DAFF and the states. PCA appreciates the efforts of those involved. We are committed to collaborating with PHA, its members, DAFF and Hort Innovation to find a workable pathway, and we will continue working towards agreement on recognition of protected cropping as a category under the Deed.

How the Foundation strengthens our case

PCA's re-application is built around the practical requirements of membership: sound governance, financial sustainability and the capacity to contribute to EPPRD cost-sharing. The Foundation shows that the sector can organise collective, transparent and well-governed funding for biosecurity preparedness, surveillance, diagnostics and research. This positions PCA as a practical contributor to shared biosecurity objectives, bringing investment and capability alongside its request for representation.

The boundary needs to be clear. Foundation gifts can only fund eligible charitable activities such as research, education and preparedness. PCA's own PHA subscription and any EPPRD levy or cost-sharing contribution would sit with PCA and participating growers under a separate mechanism, not in the Foundation's gift fund.

A proportionate levy proposal

PCA has told the Minister that the sector is not seeking special treatment and is willing to contribute on the same basis as other horticultural industries. In her reply (ref MC26-001309), Minister Collins acknowledged PCA's reasons for pursuing membership, noted that membership decisions are made collectively by PHA members, and asked DAFF to contact PCA to discuss funding aspects of the EPPRD arrangements, particularly voluntary payment mechanisms, with David Gavin as the point of contact. PHA can advise on membership and

Deed signatory requirements, and Hort Innovation on eligible biosecurity activities within research and development programs.

Our objective is that any contribution is proportionate. PCA proposes that protected cropping pay only the biosecurity components of the levy capsicum growers already pay, and not the research and development component. Capsicums fall under the national vegetable levy of 0.51% of the sale price, made up of 0.485% for research and development through Hort Innovation, 0.015% for biosecurity activity through PHA, and 0.01% for emergency plant pest responses under the EPPRD. The two biosecurity components, which are what fund PHA membership and EPPRD cost-sharing, total 0.025% of the sale price, or \$25 for every \$100,000 of produce sold. The table below shows what that means for a grower.

Annual sales	PHA biosecurity activity (0.015%)	EPPR emergency response (0.01%)	Total biosecurity levy (0.025%)
\$1 million	\$150	\$100	\$250
\$5 million	\$750	\$500	\$1,250
\$20 million	\$3,000	\$2,000	\$5,000

The vegetable industry's own experience shows how far a small standing levy goes. Its EPPR levy sat at zero until 1 October 2018, when it was activated to repay the Commonwealth for underwriting the industry's share of the tomato potato psyllid response. It was then kept active, and the reserves built up were enough to cover the vegetable industry's share of the Varroa mite response, of up to \$800,000, with no additional cost to growers. Tomatoes, by contrast, are expressly excluded from the vegetable levy, so glasshouse tomato growers currently have no levy-funded seat at the PHA table and no levy-funded reserves to draw on when an incursion like ToBRFV occurs. A protected cropping category under the Deed is intended to address that gap for tomatoes and other non-levied crops grown under cover, subject to agreed coverage and contribution arrangements.

Next steps

- Finalise the formation of the PCA Food Security Foundation – targeting 1 November 2026.
- Lodge PCA's re-application for Plant Industry Membership of PHA, supported by the Foundation's governance and funding model.
- Work with PHA, its members and DAFF towards recognition of protected cropping as a category under the EPPRD, covering all non-levied crops grown under protected cropping methods and structures.
- Meet DAFF on EPPRD voluntary payment mechanisms, as offered in the Minister's reply.
- Secure the requested group meeting in Canberra with DAFF and PHA, and a formal ToBRFV update to members.
- Continue engagement with the Cyber and Infrastructure Security Centre, following PCA's 29 June 2026 letter seeking recognition of large-scale protected cropping as critical food infrastructure under the Security of Critical Infrastructure Act 2018.

4. National Construction Code and the ABCB

Background

Growers across the country continue to face frustration with compliance on new glasshouse builds. PCA's efforts to secure a discrete NCC classification for protected cropping structures were de-prioritised by the ABCB in 2019 and 2022, and concessions promised to PCA in 2023 and 2024 were again de-prioritised, not helped by a change of government. While the NCC sets the rules, states interpret farm buildings differently: Queensland and South Australia provide some concessions, and state governments, fire authorities and councils often apply the code differently, so there is no one-size-fits-all outcome.

Fire and egress are the main points of contention, along with unnecessary planning rules and water requirements for fire safety. An ABCB-funded fire and egress literature review in 2024 was of limited assistance, and staff turnover at the ABCB has made continuity difficult. The politicisation of the NCC and a lack of funding have been a setback, but also an opportunity.

Work under way

PCA has formed an NCC Sub-Committee to guide this work. In April 2026 the Sub-Committee agreed to focus first on concessions for high-technology glasshouses, and PCA has been reviewing overseas literature supplied by Achmea and Hagelunie to support consultation. The ABCB has indicated it will help, but has advised that PCA's case should focus on how red and green tape is affecting the economy, employment and productivity, and national food security outcomes. At the Board meeting on 18 August 2026, circulation of the full literature review to directors was still awaiting documentation from the ABCB, with only an Executive Summary having been received.

PCA's NCC Sub-Committee:

Julie Krieger (PCA, Chair)
Rudi van der Voort (industry advisor)
Jack Mooney (Provenance Propagation)
Folco Faber (Apex Greenhouses)
Merjin Kuiper (Van der Hoeven Australia)
GertJan Prins (Achmea Farm Insurance)
Wim van Esch (Hagelunie)

Discussions with the ABCB

A meeting with the ABCB was planned for late September 2026 to hear directly from growers and suppliers, with representatives including Apex Greenhouses, Rijk Zwaan and Jack Mooney invited to join online.

Meeting date: 24 September 2026

Attendees: Thomas Hannaford (ABCB), Folco Faber, Rudi van der Voort, Jack Mooney, Julie Krieger

Meeting Summary:

Industry participants set out the practical and financial burden of current building classification and fire compliance for commercial glasshouses. Greenhouses are generally classified as Class 8 (or 7B for research), but classification and occupancy assumptions vary by jurisdiction and certifier, even for near-identical structures. Because economical glasshouses are 50,000–100,000m², every build exceeds the 18,000m² threshold and triggers the stricter fire regime. The result is repeated performance solutions (about \$5,000 and 1–2 months each), fire engineer reports of \$30,000–\$60,000+, hydrant infrastructure of \$340,000–\$400,000, and potentially \$1.5 million for sprinklers. That adds up to roughly 10% of total build cost, including metropolitan-spec requirements in locations hundreds of kilometres from a metro fire appliance. Participants stressed that fire load in modern glasshouses is extremely low (a view shared by insurer Achmea) and that occupancy is falling with automation. They also pointed to the same performance solutions being repeated nationally as a clear case for standardisation. It was noted that PCA's Proposals for Change in 2019, 2022, and 2023, recognised the significant technical work undertaken in fire and egress. Despite this work being undertaken, the proposals for change were all deprioritised or rejected. It was confirmed during the meeting that no further work will be required in regard to submitting a new proposal for change. It was noted that the previous proposals for change included sufficient data to develop a concession framework for the sector.

The ABCB is focused on housing and an internal modernisation program, and that the Protected Cropping project has been on hold for about nine months. Thomas suggested the ABCB is sympathetic but cannot initiate new work without a top-down mandate. He advised PCA to pursue concessions within Class 8 rather than a new classification, since the Building Codes Committee has already settled on Class 8. He also recommended lobbying Agriculture and Building Ministers, as the Building Ministers' Meeting sets the ABCB's work program. Advocacy efforts should address the time and cost impacts of the Code, and their direct impacts on productivity, food security, cost of living, and employment. The Queensland 2023 farm building concessions were identified as a useful precedent. The ABCB committed to:

- raising an Industry Guidance Document internally (a lower bar than a code change, though still about six months of staff time)
- putting the case to the ABCB CEO when the opportunity arises
- advising on how to target any future Proposal for Change
- informally reviewing PCA's ministerial argument before it goes forward

Thomas also agreed to undertake a glasshouse tour near Melbourne to aid in better understanding the technical issues pertaining to classifying impacted structures.

Next steps

Action	Owner	Timing
Promote PCA's NCC work more actively and let growers know PCA is here to help	PCA	Ongoing
Continue to advocate for a concession focused on the high-technology sector (commenced May 2026)	NCC Sub-Committee	Ongoing

Action	Owner	Timing
Draft correspondence to each States' building and agriculture minister/s, stating PCA's position and seeking inclusion of concessions in the NCC workplan.	PCA	End October 2026
Draft correspondence to Federal Housing minister (Clare O'Neil), and Federal Agriculture minister (Julie Collins).	PCA	Mid-November 2026
Develop explanatory notes and communication material on concessions, with ABCB funding support	PCA	End January 2027
Consider an advocacy campaign (incl. social media) in states and selected local government areas	PCA	Mid-November 2026
Explore a certified PCA fire and egress consultant members can use for new builds	PCA	January 2027

5. Key dates ahead

- 13 October 2026: next PCA Board meeting.
- 20 October 2026: PCA AGM, 12pm, online.
- Next PCA conference (26-28 July 2027, Gold Coast): public launch of the PCA Food Security Foundation.

Thank you for supporting the PCA

Regards,



Andrew Tout

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