

**IGAB Review Submission** – Andrew Boundy – Blue Ribbon Group.

Following on from the meeting on the 14<sup>th</sup> July 2016 in Brisbane, I would like to submit the following thoughts:

**Industry Involvement:** During the meeting I ask for **Meaningful Industry Involvement**. By this I am asking for Government Committees or Review Panels not to:

- 1) Deliver a “Draft” document for review a day or even a week prior to its actual release or implementation. We do need time to read, digest & reply.
- 2) Call meetings, debating the tabled document, agreeing that there is merit in the positions raised, and then releasing the document without the agreed changes.
- 3) Reviews happening concurrently such as the CRIS & Legislation Review last year.

We do take exception to being used as “Industry Consultation” and not actual having a voice.

It should also be understood that “Industry” is normally happy to help, but we have to pay our way as well, so dedicating some time to Government reviews is fine but it is a finite resource.

**Shared Responsibility:** I would like to clarify how much Industry is expected to **share** the responsibility for Biosecurity.

**Exports:** Below is how our company is sharing the responsibility in the export process:

- 1) **Contract Farmers** to grow the crops required. We provide agronomic & financial support to some of our growers, depending on their location and the crop grown under contract.
- 2) **Review Country requirements** for prospective markets: This information is available through the MICOR system which the department maintains but the Department does not provide the information within. This task falls to the Exporter, who must supply a relevant import permit or a letter from the Import country if an Import Permit is not required. This information may change without notification if a different Import Permit is supplied by a different Exporter.
- 3) **Crop Inspections**, are carried out where required by the importing country, under State Government legislation as they no longer provide the staff to undertake this requirement. Costs involved – Auditing by State Government \$5-600, Staff training, Staff time in crop inspection, staff time to process required documentation,
- 4) **Registered Export Establishment:** Product is moved from farm to a Registered Export Establishment. Our company has a number of grading facilities registered (2173, 1252 & 6853).  
Costs involved – Application \$600, Registration \$3000 per annum, Auditing \$5 - 600
- 5) **Product sold & Shipment booked**
- 6) **Container & Goods** Inspected by AO: Our company employs a number of Authorised Officers  
Costs involved – Training Authorised Officer - \$250 application + \$1750 Learning & Assessment + \$250 AAO Approval (+\$2000 if your staff member requires additional Learning & Assessment), AO Annual Registration \$750, AO Annual Auditing \$5 - 600, Staff wages, Super & Insurance while performing the tasks of an AO.
- 7) **Container Packed**
- 8) **Phytosanitary paperwork completed & submitted by Company AO:**

Costs involved – Staff wages, Super & Insurance while acting as an AO

**9) Container returned to port**

**10) Documentation** staff forward AO Inspection Documentation for Review and Phytosanitary Certificate Authorisation:

Costs involved in the Electronic Phytosanitary process:

Access to electronic system: \$ 850 per annum

Request RFP: Company fills in electronic portal & forwards to DAWR – Staff training & time involved in inputting information

RFP Accept: Fee for service charge \$16/15 mins

RFP Documentation Processed: Fee for service charge \$16/15 min

RFP Authorised & Phytosanitary sent electronically: Fee for service charge \$38 per document

Phytosanitary Certificate printed: Printing costs borne by company

**11) Container sails on vessel.**

Out of all of these steps from contracting the farmer to the goods being exported, our company either carries out or pays for (under “Fee for service”) everything except the maintenance of the MiCOR system.

Blue Ribbon is also involved in a number of Industry Associations along with my involvement as an Industry representative on the GPPEICC (Grains & Plant Product Export Industry Consultative Committee) with DAWR.

**Imports:** Below is how our company is sharing the responsibility in the export process:

Through our domestic company we maintain a Quarantine Approved Premise. Costs include Application \$180 + Assessment \$30 - 50/15 min + \$2900 per annum, Staff annual audit \$50/15 min Facility Annual Audit \$50/15 mins.

**Industry Partnering**

In the past a lot of changes have been dropped onto Industry without meaningful consultation or warning. Government departments must be weary of overloading industry with all of the responsibility for Importing or exporting or they might find people looking to cut corners to save money, and that is definitely not in the country’s interests.

A successful example of Industry partnering would be the take up of the Authorised Officer program. However this originally was funded through the DAWR Industry Fund (the funds held by DAWR from excess charges to exporters) so was supplied at no cost to those undergoing training and assessment. The introduction of the new fees will impact on the number of AOs staying in the program and the number of new applicants starting off in the process.

Best regards  
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