

Ben Furney Flour Mills have been supplying mixed container lots of packaged grain & flour products to Thailand for many years. Up until recently only prescribed grains have required phyto coverage and under the system at that time there were no issues with the other included products not required on the phyto. Over the last few months our customer in Thailand has requested all products in the container be included on the phyto certificate due to changes in Thai import requirements. As a number of the ordered products were not already included in MICoR (Thailand) there has been great difficulty and in some cases it has been impossible to get phyto inclusion. On these occasions the requested products have had to be excluded from the shipment losing immediate and future export sales and business opportunities.

The Thai requirement appears to source from varied interpretation in Thailand itself with some officers allowing products not listed in MICoR to pass as previous and others refusing entry of the complete container if all are not included on the phyto certificate. Our customer obviously wants to ensure this does not occur and is therefore requesting all are included but this has been refused by DAFF if products have not been requested by Thai authorities or are not already MICoR listed. Although the inconsistency seems to arise in Thailand itself the Thai government appears reluctant or completely against providing Australia with a documented request for inclusion of new products under the current arrangement. We have received support from DAFF at document issue level with several products added to MICoR however this has been a very difficult process and unacceptably extends any individual phyto issue where this has occurred.

It would be appreciated if a review of the MICoR / Phyto process is included in the regulation review whereby, if phyto inclusion of a product is requested by an importing customer and that product is not formally MICoR listed, that it can still be inspected for compliance and if acceptable included on the phyto based on that inspection or at the exporters risk. Obviously this would be in relation to products where similar products are already included in MICoR or by manufacturing process risk is limited, known or can be proven.

The alternative may be to have a rapid confirmation process in the MICoR / DAFF regulations whereby it is possible to have a system of approval already in place with the importing country authority. This would avoid the current responsibility resting with the exporter who has little direct influence with the importing country authority.

Your review of this submission will be appreciated.