

21 September 2015

Agricultural Export Regulation Review

By email: biosecurityconsultation@agriculture.gov.au

Dear Sir/Madam,

Re: Agricultural Export Regulation Review

GrainGrowers is an independent and technically resourced, grain farmer representative organisation with 18,500 members across Australia. GrainGrowers' goal is a more efficient, sustainable and profitable grain production sector that benefits all Australia grain farmers and the wider grains industry.

Australian grain farmers generate annual exports of \$12.5 billion which represent 60 – 70% of total production. International competitiveness is therefore crucial for our entire industry, and the importance of our grain's reputation as safe, reliable and clean underpinning that competitiveness, cannot be understated.

GrainGrowers appreciates the opportunity to make this submission to the Department of Agriculture Export Regulation Review as it relates to exported grains. For continued market access our industry relies on robust and reliable export regulation that underpins the integrity of our farmers' product. GrainGrowers would like to reiterate the following industry messages, for the purpose of your review:

- Technical barriers to trade are increasing. Government to government engagement on such issues is crucial to their resolution and for the maintenance of our grain markets.
- Sound policy cannot be accompanied by inadequate resourcing of the departments that support industries capacity to effectively work with the regulation.
- Regulation must be updated to reflect new technologies, operational procedures and industry trends to ensure efficiencies can be captured, however care must be taken that this is not at the expense of the integrity of the systems/processes.
- Regulation and its enactment must be in the interest of long-term country to country relationships and the improved international competitiveness of Australian grains.
- Australian grain farmers already fund many functions that underpin the operation of export regulation (for example, the National Residue Survey, GRDC funded research for export protocols). Similarly, cost recovery of plant export certification is recovered via grain exporters. These contributions should be recognised when considering the apportionment of responsibilities within regulations.
- 22,000 Australian grain farmers rely on a robust system assuring the quality of their product to market. It is important that the review is undertaken with the long-term prosperity and competitiveness of the entire supply chain in mind.

GrainGrowers would welcome the opportunity to provide further input as useful to your review.

Yours sincerely

Dr Cheryl Kalisch Gordon,

Senior Economist and Manager, Trade & Market Access