

21 September 2015

Agricultural Export Regulation Review
Australian Government Department of Agriculture
GPO Box 858
Canberra ACT 2601



Midway Limited

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Via email – biosecurityconsultation@agriculture.gov.au

RE: Submission – Agricultural Export Regulation Review

Midway Limited is a woodchip exporter based in Geelong (VIC), with joint venture operations in Portland (VIC) and Brisbane (QLD). Collectively, the Group exports over 2.5Mil tonnes of woodchips annually, with in excess of 70% exported into markets with Importing Country requirements (predominately China). The Group's exports to Japan have no such importing requirements.

The development of systems and ongoing compliance with the regulatory framework is onerous and any opportunity to improve efficiencies and reduce regulatory burden is welcome.

Specific examples where the current regulations can be improved are:-

- Woodchip is currently treated as grain under Export Control (Plant and Plant Products) Order 2011, including phytosanitary and registered establishment requirements. This includes the performance standard and treatment of product hygiene, site hygiene, rodent control, product sampling and vessel inspection.

Product based Export Controls should be developed for woodchips, specifying the minimum standard required for compliance with Importing Country requirements for woodchips, whilst keeping the regulatory burden to a minimum.

- Currently there is a requirement for officials from the Department of Agriculture to be heavily involved in development and monitoring of compliance against the Regulations.

Authorised Officers should be allowed to undertake site registration and compliance auditing, inspection and testing.

- We have experienced an inconsistent interpretation and application of the requirements of Export Controls between different Department of Agriculture regions. For example, the Brisbane North region interpretation of the requirement for grain Export Control, as it applies to woodchip (covering both phytosanitary and registered establishment requirements), has been inconsistent with the Geelong and Portland regions.



The application of product based Export Controls should assist in the development of a clear framework to evaluate and apply Export Controls consistently.

Midway supports the reform of the Export Control Act and related regulatory framework and support a proactive approach to process improvement and a reduction in unnecessary or inefficient regulations and controls.

Midway is a member of the Australian Forest Products Association (AFPA) and supports AFPA's submission in relation to the Review.

Thank you for the opportunity to provide comment. I can be contacted on (03) 5277 9255 to discuss this submission further if required.

Yours sincerely

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