



23 September 2015

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

Dear Sirs

We wish to formally comment on the above review. PFIAA represents manufacturers and exporters of petfood products. We believe our membership include 95% of the volume of prepared petfood marketed in Australia.

We respond to your scripted questions as follows:

1. Petfood is increasingly facing competitive pressure from other export suppliers in its traditional markets. New opportunities are becoming increasingly difficult with stringent market access requirements; China being one example. Despite efforts marketing our countries advantages these barriers are increasing despite the quality and safety of Australian products.
2. Export regulations where some petfood products are “prescribed” and others “nonprescribed” goods adds un-necessarily to export processes. All petfood should belong to a single category as “non-prescribed” goods.
3. Our current Letter of Exchange (obligation on our industry association to manage its quality program on which export certification is based) is somewhat “clunky”. For example it sunsets annually requiring a new agreement to be signed. The tenure of the agreement could be lengthened or indeed a better solution devised with which to manage obligations of both government and the industry.
4. The current Export Register (ER) requires our members to apply for listing of specific markets if they wish to export to designed markets. These include markets where there are defined market requirements most of which are included as standard practice under our industry standard AS5812 against which our exporters are certified. These should not require specific identification within ER. Separate ER listing should be reserved for markets where designated checklists and audits are conducted. (currently China, EU and South Africa).
5. Communications required under international treaties- SPS process: Technical market access has been compromised for petfood products in recent times due to the affects of Avian Influenza. Markets impose blanket bans on poultry products despite the lack of risk due to petfood being thermally processed and meeting OIE guidelines. While it is difficult to predict individual market reaction, one solution is to regionalise outbreaks and hence declare freedom (except for the designated region or at worst state). SPS advise should clearly enumerate the zone and region affected, not Australia as a whole.
6. Communications to industry- we believe there should be better liaison between Dept Agriculture (as responsible authority for technical market access) and Dept Trade (responsible for trade promotion). Efforts of overseas staff could be better co-ordinated so that outcomes are better managed. Industry is better able to capitalise on outcomes when it is a part of such processes.

We would be pleased to elaborate further on these issues.

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We appreciate being asked to contribute early in the consultation process and the professional process adopted in developing better regulations for the future.

Yours faithfully

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