



**Commonwealth Fisheries Association**

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4 September 2009

Committee Secretary  
Senate Rural and Regional Affairs and Transport References Committee  
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**Management of removal of fee rebate for AQIS export certification functions**

The Commonwealth Fisheries Association (CFA) welcomes the opportunity to provide the following comment on the Australian Government's management of the removal of the 40 per cent fee rebate for the Australian Quarantine and Inspection Service (AQIS) export certification functions.

Specific Issues

*(a) the level of industry support for the removal of the 40 per cent rebate prior to the implementation of comprehensive reform of AQIS's export inspection and certification services*

The CFA opposed the fee increase together with all State Seafood Industry Councils in a letter to the Minister for Agriculture Fisheries & Forestry on 21 November 2008. The CFA's position is for the reform process to be fully implemented prior to any review of fees and charges. Fees and charges should also be reviewed in accordance with the Australian Government Cost Recovery Policy Guidelines.

*(b) the adequacy of consultation by the Government in the development of industry work plans*

The CFA contends the Government failed to adequately consult the seafood industry on the initial development of the industry work plans as the makeup of the Seafood Export Consultative Committee, and Task Force, where these discussions took place, did not comprise representatives of the peak industry bodies at either state or national levels.

It was only through intense lobby efforts that CFA were later given a seat on the Seafood Task Force. CFA has not had sufficient time to consult its members on the development of the seafood work plan.

*(c) the capacity of the Government, including AQIS, to implement efficiency proposals*

The CFA questions the ability of AQIS to deliver efficiency proposals where a conflict of interest arises. For example, the use of third party service providers (non-government) in the certification process may present a possible threat to AQIS staff and job security.

A critical issue that has been overlooked through the entire process to date, across all industries, is the merger between AQIS and Biosecurity Australia and the resultant impact this may have on operations, fees and chargers.

*(d) the adequacy of government funding to implement industry work plans*

The adequacy of funding will not be known until the final reports are completed, discussed and assessed by the 'Seafood Export Consultative Committee'. The 'seed money' provided by the Australian Government is to investigate efficiency gains, not to fund the implementation of the work plans.

*(g) any other relevant matter.*

### **Cost Recovery Policy**

The CFA contends that the process for reviewing/amending AQIS fees and charges should be in accordance with the Australian Governments Cost Recovery Policy Guidelines, which the CFA believes are the correct 'legal instrument' for setting fees and charges for government agencies.

To allow an independent review, i.e. the Beale Review, to gazump the official government process of establishing a cost recovery policy is a dangerous precedent and one which should be opposed.

### **SECC Makeup**

SECC comprises 'skills based' representatives appointed through a public expression of interest process. Unlike other consultative committees, SECC does not comprise representatives from the various peak industry bodies, so the CFA is not privy to the discussions that occur within SECC meetings. This is a major concern as SECC is not accountable to industry for its decisions or performance.

Whilst AQIS have advised that it will review the future makeup of SECC, it is of concern to CFA that it is not represented on SECC and therefore cannot engage AQIS and/or industry on the implementation of the work plans if SECC becomes the custodians of the plans, and finance matters.

Yours sincerely



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Chief Executive Officer