



Feed Ingredients and Additives Association of Australia Inc

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Ms Norelle Laucher
Director (A/g) - Agricultural Export Regulation Review
Trade and Market Access Division
Department of Agriculture and Water Resources
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exportlegislation@agriculture.gov.au

Dear Ms Laucher,

On behalf of the Feed Ingredients and Additives Association of Australia (FIAAA), the national peak industry organisation representing suppliers of feed ingredients and additives in Australia, I provide comments on the *Exposure Draft Export Control Bill 2017* (Draft Bill) and the associated Regulatory Impact Statement (RIS).

Feed ingredients are nutritive component parts or constituents of any combination or mixture making up a feed. Ingredients may be of plant or animal (including aquatic) origin or other organic or inorganic substances. Feed additives are intentionally added components of feed not normally consumed as a feed ingredient, which affects the characteristics of feed or animals fed with it. It includes a pre-mix which consists only of feed additive components, micro-organisms, enzymes, phytobiotics, acidity regulators, trace elements, vitamins, preservatives, colouring agents, binders, dust suppressants, carriers, flavours and other products.

The Feed Ingredients and Additives industry's products are critical to maintaining and improving Australia's livestock productivity.

The industry also participates in export trade, so improved market access would be of benefit. Feed ingredients and additives are deemed non-prescribed goods (NPG), which may require Government Certificates to enable export. The Department of Agriculture and Water Resources (DAWR) works with FIAAA and its members to facilitate the process, in particular having developed a Letter of Exchange underpinning some arrangements between DAWR and FIAAA. Nevertheless it is pleasing that the RIS acknowledged that there were areas for improvement in the management of NPG exports.

It is noted that the Draft Bill will enable DAWR to increase the scope of products for which certification could be provided, and FIAAA would welcome the inclusion of feed ingredients and additives within the scope. It is also anticipated that the increased discretionary powers, within DAWR, will provide the means for our industry to respond rapidly to export market opportunities, in a diverse and constantly changing global environment.

The RIS included consultation questions, and a general response to questions 6 and 7 on the process of exporting is provided from the experience of FIAAA members exporting or attempting to export their products.

There has been an increase in demand from importing countries to require government certification. The requests are not consistent across the importing countries. The type of, and inclusions on, government certificates varies. Despite the willingness of DAWR to facilitate the process, achieving an outcome is time and resource intensive for both DAWR and the FIAAA member, and does not always result in issue of a government certificate. The current situation is therefore an impediment to trade.

The process of obtaining a government certificate for NPGs involves multiple steps and contact points and commences with an email request to DAWR. It cannot be achieved via completion of one form or an online application. For each export the FIAAA member must provide an individual request from the competent authority of the importing country for government certification. Over the course of weeks or months the DAWR and applicant determine the pathway to certification.



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Not all FIAAA members seeking to export have been successful in obtaining a government certificate and have stopped trying to export. Exclusion from overseas markets for just one product can cost a company many millions of dollars in turnover. (Confidential information provided separately).

The FIAAA commends DAWR for pursuing changes that will improve NPG export management. As the associated Rules are yet to be developed, the FIAAA support of the new legislation is cautious: the association would welcome any opportunity to work with DAWR to develop Rules that will facilitate market access and enable growth in export trade for its members.

Please do not hesitate to contact me should you require any additional information in respect of this issue.

Yours sincerely,

A handwritten signature in blue ink that reads 'Noelene Davis'. The signature is written in a cursive style and is positioned above a horizontal line.

Noelene Davis
Executive Manager

23 October 2017