



August 2015

Via email: [costrecovery@agriculture.gov.au](mailto:costrecovery@agriculture.gov.au)

I am pleased to provide the following submission on behalf of the Australian Seed Federation on the Cost Recovery Implementation Statement Consultation Draft - Plant Export Certification 2015–16

The Australian Seed Federation is also pleased to confirm that it is interested in receiving any updates about this consultation.

All correspondence regarding this submission and the consultation process can be addressed to:

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If you have any questions do not hesitate to contact me.

Yours sincerely

Bill Fuller  
Chief Executive Officer  
Australian Seed Federation



**Australian Seed Federation**  
SOWING SEEDS

ABN 66 003 160 638

**Australian Seed Federation  
Submission  
Cost Recovery Implementation  
Statement Consultation Draft - Plant  
Export Certification 2015–16**

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The Australian Seed Federation (ASF) is the peak national body representing the interests of Australia's sowing seed industry.

The ASF membership is commercial, diverse and includes stakeholders from all sectors of the total seed supply chain. The ASF membership also covers a diversity of geography, climate, crops and cultivars. Members of the ASF regularly import and export seed for sowing.

The ASF also represents its members internationally, as a member of the International Seed Federation (ISF) and the Asia Pacific Seed Association (APSA).

For more information on the ASF and its membership please visit [www.asf.asn.au](http://www.asf.asn.au)

ASF shares the genuine concerns raised by its members relating to Cost Recovery Implementation Statement Consultation Draft - Plant Export Certification 2015–16 that:

- i. The grains industry went through extensive consultation regarding the initial introduction of cost recovery initiatives. After a short amount of time this has changed with significant increases in cost. Why have costs to be recovered increased in such a short amount of time?
- ii. The proposed introduction of a levy for Authorised Officers will discourage uptake and may see some cease which is in direct contrast to the direction that the Department of Agriculture is trying to achieve. This will be particularly true for smaller Export Establishments.

At the introduction it was clear that training would be subsidised for some time but there was no mention of a levy being introduced for administration. This has left those members who have pursued the Authorised Officers initiative being very cautious due to other unknown costs that may be introduced.

- iii. For most shipments, there is an increase in total cost. For small volumes such as trial seed, the cost per kilo is significant (in the case of using Department inspectors this can be a 250% increase on a 1kg shipment). High costs of exporting trial and sample seed will discourage breeding initiatives focussed on overseas opportunities.
- iv. Some members of the industry can absorb the higher costs of exporting if service levels improved. The opposite has occurred with delays and difficulty in obtaining inspections, the lack of availability of departmental staff for guidance and to address outstanding issues. The ASF encourages the Department of Agriculture to introduce a service agreement to industry.

*Ends*