



21 October 2011

Jeanette Radcliffe, Committee Secretary  
Senate Rural Affairs and Transport Legislation Committee  
P O Box 6100  
Parliament House  
Canberra ACT 2600

By email- [Lauren.McDougall@aph.gov.au](mailto:Lauren.McDougall@aph.gov.au)

Dear Ms Radcliffe

We refer to your inquiry into the proposed Quarantine Amendment (Disallowing Permits) Bill 2011.

Over 8 million households in Australia own pets, one of the highest rates of pet ownership in the world. The petcare market is estimated to represent consumer expenditure of over \$6B and employ some 47,627 Australians.

The Pet Food Industry Association of Australia represents all major manufacturers and marketers of petfood in Australia. Our industry contributes significantly to the Australian economy having sales at retail level estimated at \$1.693B in 2009. Additionally Australia is a significant exporter of petfoods with export (FOB values) of \$263M in 2009. There is also a significant proportion of imported products estimated at \$195 M in 2009 (customs value).

All imported products are subject to import permits granted following rigorous and stringent biosecurity guidelines established to safeguard Australia's unique disease status. These products form an important and significant component of the Australian pet market. Many products also provide varieties and specialist diets not otherwise available locally.

An efficient and effective import permit system operated by AQIS is key to the future of these markets and pet owners in Australia.

We believe the proposed Bill is unwarranted, unworkable, risks exposure to confidential data and will add unnecessary delays, continuity and costs to importers and the pet owning public. We suggest to the Committee that it recommend that the Bill is not passed.

Unwarranted- Currently biological import permit applications are assessed by scientifically qualified and experienced officers on the basis of quarantine risk and guidelines established by government. If guidelines are lacking then government should review these and not override individual assessments conducted to comply with established guidelines and scientific principles.

Unworkable- Australia is signatory to World Trade Organisation guidelines and adopts science, sanitary and phytosanitary measures to protect human, animal and plant life and health. Import Risk Assessments are used as the basis to define risk. Further scrutiny by government is unnecessary in individual assessments as these are already conducted under strict scientifically based guidelines. Australia must maintain its adherence to WTO principles in order to fairly access export markets.



Import Permit delays- It is likely that the requirements of the bill will introduce further delays in assessing and approving Import Permits. The approval system is already arduous and time consuming and adding further parliamentary approvals will further exacerbate this position.

Commercial in confidence data- Import Permit applications require full disclosure of processes and treatments, many of which are provided as commercial in confidence to AQIS. Releasing such information to others undermines the commercial in confidence agreements established between the applicant and AQIS.

Risk of continuity- Importers of petfood establish their businesses assuming continuity and a reasonable background of understanding of requirements. Imposing parliamentary review without clear and concise guidelines, imposes uncertainty of continuity and hence substantially increases business risk.

Many of these factors will add cost to products many of which there are no alternatives available from domestic manufacturers. The pet owning public would bear the cost, inconvenience and potential health risks to their pets.

We urge the Committee to reject the Bill and that it not be passed.

Yours faithfully

John Aird  
Executive Manager