

Inquiry into the Quarantine Amendment (Disallowing Permits) Bill 2011

We refer to your letter of 21st September 2011 inviting a submission that addresses all or some of the issues identified in the bill by 21st October 2011.

Dear Ms Radcliffe,

I have been contacted by the Australasian Paper Industry Association who have requested I attend to this matter with Canberra directly .

My name is Dean Mullins and I represent the firm of customs brokers Phoenix Freight system who deal with the paper industry and various other industries within the importing community . I would like to provide an official response to your amendment proposal on behalf of the Australasian Paper Industry Association and the other associated parties phoenix deal with including companies from the electronic , medical, pharmaceutical and Liquor industries. I would like to object to the amendments as set out within the Quarantine Amendment Bill 2011 and as attached to this objection .

As this is the initial draft and may undergo changes in future I request I'm included in any future discussion regarding this amendment proposal.

It is my understanding this bill is termed a Private members Bill. Generally less than 1% of these bills gain traction in parliament and eventuate in approval. However in saying that this bill has been structured to address Australia's primary produce industry but is worded to have a far reaching effect if approved on all importers at an import barrier control level.

The back ground of this Bill is to protect Australian Primary industry , Apple , Banana ,fruit growers and vegetable producers etc. Currently The Australian Quarantine and inspection service "AQIS" approve overseas producers to import their produce into Australia for a period of 3 years . The Bills intension is to assess each of these application as they fall due or otherwise thru parliament and may evaluate in cancelling these import approval to protect threatened local primary industry . This type of bill contravenes a number of global undertakings Australia is a signatory too therefore should not gain the required traction for approval. The negative impact this bill may have if approved on the remainder of the importing community is related to ALL import application such as Annual packing declaration and individual import application. This bill would potentially see all import applications directed to parliament for review and approval . This protocol is untenable and would grind the importing community to a halt awaiting import approval for all AQIS related import applications from parliament. This bill may allow parliament to determine what products could arrive into the country and those goods that would be refused entry into Australia depending on parliamentary decisions .

Currently all importing shipment are subject to Quarantine scrutiny in the form of a documentary packing declaration and annual packing declaration that is attended to within the Customs Brokers office and within multiple "AQIS" facilities throughout Australia. Other AQIS import approval's are handled generally thru state AQIS offices with little intervention from AQIS head office in Canberra. These import approvals take hours or at worst days to process. By proceeding with amendment to the Quarantine Amendment (Disallowing Permits) Bill 2011 potentially directing documentation and application to Parliament for assessment would cripple import trade and containerised shipping facilities into Australia Not to mention the knock-on effect to ALL containerised Exports .

Generally all container imported into Australia are re-exported with Australian Produce . By crippling the import function of containerised shipping the direct effect is to cripple the Export function of containerised shipping .

By Way of example of the far reaching effect introduction of the amendment may have when directing all import application and permits to parliament for assessment and approval which would grind the shipping industry to a halt within days or weeks at worst. This was evident with a change in reporting system in October 2005 when the Australian shipping industry was crippled over a period of 7-30days due to a software charge within the Australian Customs service cargo report platform . The reporting platform had been tested prior to introduction however failed historically on implementation crippling the shipping community . While the reporting platform was eventually corrected with temporary stoppage an ongoing programme of import approval through Parliament would see the cost to the importing community increase immeasurable .

Yours Sincerely

Dean Mullins