



**Unilever Australasia Submission
To the Senate Standing Committees on Rural Affairs and
Transport, 21 October 2011
In response to:
Quarantine Amendments (Disallowing Permits) Bill 2011**

1. ABOUT UNILEVER

Unilever works to create a better future every day. We help people feel good, look good and get more out of life with brands and services that are good for them and good for others. In a history that now spans three centuries, Unilever has grown into one of the world's most successful consumer goods companies. No matter who you are, or where in the world you are, the chances are that our products are a familiar part of your daily routine. In fact, two billion times a day, someone somewhere chooses a Unilever product.

Our proud history in Australia and New Zealand began with the first ever soap production factory in Sydney in 1899, followed by the commencement of production in New Zealand in 1919. The Unilever of today employs more than 1800 people throughout our offices and manufacturing sites across Australia and New Zealand and generates sales of more than \$1 billion each year.

Our portfolio includes some of the Australia's best-known household names, including: Flora, Lipton, Bushells, Dove, Rexona, Sunsilk, Vaseline, Omo, Continental and Streets. More than 70% of the products we sell in Australia and New Zealand are manufactured in our factories at North Rocks and Minto in NSW, Tatura in Victoria and Petone in New Zealand. This means that we import 30% of products and in addition to this we import a significant number of raw materials not available in Australia to support this local production. We also have an important growing business in exporting locally manufactured products to the Asian region.

Unilever Australia Limited is an active member of the Australian Food and Grocery Council and the Food and Beverage Importers Association and we have participated in the development of these industry submissions in addition to this company submission, as this is an issue that is of high importance to our business.

2. SUMMARY

Unilever Australasia welcomes the opportunity to make a submission to the Senate Standing Committees on Rural Affairs and Transport in response to the inquiry into the Quarantine Amendment (Disallowing Permits) Bill 2011.

Unilever strongly supports the need for Australia, as a trading nation, requiring a sound biosecurity system to preserve our favourable pest and disease status. This is integral to Australia's agricultural and food sector and to minimising the risk of harm to the country's environment and biodiversity.

A robust and efficient Biosecurity framework has been proposed by industry as a key element of the National Food Plan currently under development to support an efficient, profitable and sustainable food industry into the future.

The stated purpose of the Bill is "to ensure that any decision to allow the importation, introduction, bringing in of or removal of a thing – defined under the Quarantine Act 1908 as an animal, plant, substance or thing – is thoroughly scrutinised". Its aim is "to protect Australia's agricultural sector from disease by further scrutiny of import risk analyses and quarantine determinations'. (Senator Xenophon, second reading speech, 25 August 2011).

We strongly believe this proposed Bill will not achieve the above stated outcomes. Rather, it is unsound and unworkable, and will interfere with the rigorous scientific grounds for risk assessment undertaken by Biosecurity Australia and risk management by the Australian Quarantine and Inspection Service (AQIS).

Through the new intervention proposed under this Bill, there are the following potential effects:

- The scientific basis for decision making will be compromised;
- An additional and complex step will be added to the permit process and will impose significant extra workload on the department with administrative burden, resulting in significant delays for the issuing of all permits;
- Commercially confidential information will be disclosed through publically releasing the names of permit holders and the commodities they are applying for permits for;
- The very detailed and thorough framework the Parliament has put in place for implementing the appropriate level of protection will be significantly weakened;
- A negative impact on the export market when the reputation of the Australian regulator (AQIS also play a role in certifying exports) is weakened.

3. CONCLUSION

Unilever Australasia, as both a local manufacturer and an importer of products and raw materials, strongly supports a robust Biosecurity framework based on sound scientific risk assessment and the implementation of appropriate risk management conditions to preserve Australia's favourable quarantine status, while promoting trade.

The passing of this Bill will only detract from the current Biosecurity framework which has been built upon by the Nairn Review in 1990 and also in the Beale review in 2009 and would result in unworkable, cumbersome and untimely regulation.

The Quarantine Amendments (Disallowing Permits) Bill 2011 should be rejected.

Parliament has put in place a very detailed Biosecurity Framework and to impose an additional political step in an administrative regulatory process that has been set up to implement this framework is unnecessary and, as demonstrated in this submission, has potential to do significant harm.