



Michael Tull • National President

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Ms Jeanette Radcliffe Committee Secretary Senate Standing Committee on Rural Affairs and Transport PO Box 6100 Parliament House Canberra ACT 2600

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Dear Ms Radcliffe

Inquiry into biosecurity and quarantine arrangements

Please find attached a submission from the Community and Public Sector Union (PSU Group) to the Senate Inquiry into biosecurity and quarantine arrangements.

Scope

The Rural Affairs and Transport Committee is undertaking a wide ranging inquiry into biosecurity and quarantine arrangements. This CPSU submission is limited to those aspects of the Inquiry dealing with the reform of Australian Quarantine and Inspection Service export fees and charges – and in particular the reform of the Australian Meat Export Inspection System.

Introduction

The PSU Group of the Community and Public Sector Union (CPSU) represents workers in the Australian Public Service (APS), Commonwealth Government statutory agencies, the ACT Public Service, the Northern Territory Public Service, Telstra, the telecommunications sector, call centres, employment services and broadcasting including ABC and SBS.

As the principal union covering staff in the Australian Quarantine Inspection Service (AQIS), CPSU has considerable knowledge and experience of AQIS operations. The preparation of this CPSU submission has been guided by the experience and expertise of CPSU members working in Meat Inspection and Veterinarian roles in AQIS.

Background

Australian export meat Inspection arrangements are currently subject to substantial reform – in advance of the introduction of a revised fees and charges regime to operate from 1 July 2011.

The key element of that reform is the development and introduction of a new Australian Meat Export Inspection System that:

- makes fundamental changes to the role of AQIS employees in the inspection and verification of export meat;
- would make substantial reductions to the number of AQIS employed Meat inspectors; and
- introduces a new and untested arrangement whereby official AQIS meat inspection work would be carried out by employees of the export meat establishments acting as Authorised Government Officers.

CPSU has played a constructive and positive role in the reform process - facilitated by a substantial consultative process between CPSU and the Department of Agriculture, Forestry and Fisheries (DAFF).

However those consultations are yet to resolve a number of serious CPSU concerns about the proposed new model. CPSU believes it is important that this Committee is aware of these issues.

Market access guarantees

Australian exporters rely on Government to maintain access to export markets. A crucial element of that market access is the maintenance of inspection and verification arrangements that meet the requirements of the importing country. Continuing and secure market access is of crucial importance to the CPSU members (Meat inspectors and Veterinarians) deployed to export meat establishments.

CPSU understands and acknowledges that DAFF have undertaken substantial consultations with export markets around the proposed changes to Australian meat inspection arrangements.

CPSU has sought assurance from DAFF that the new meat inspection system arrangements have been approved by all our export markets. DAFF inform CPSU that such approvals have been secured.

However CPSU members – who work closely with the owners, managers and employees of export meat establishments - continue to hear from the meat export industry that not all markets are aware of or have accepted the new arrangements.

CPSU believes it would be of benefit to CPSU members and the meat export industry generally for the Department to provide additional assurances that the proposed new Australian Meat Export Inspection System has been accepted and agreed to by our trading partners.

Realisation of efficiencies to industry

The driving force behind revised meat inspection arrangements is to reduce the cost to industry of meat inspection.

While the reform process does carry the prospect of job losses for CPSU members CPSU understands the importance (and long term benefit to CPSU members) of an efficient regulatory regime.

CPSU understands that there is concern from some small and medium sized plants that the new Australian Meat Export Inspection System as currently designed may not deliver efficiencies or savings – or may in fact lead to a cost increase.

CPSU members employed at those establishments are concerned that the practical effect of the new Australian Meat Export Inspection System may be to place smaller plants at a competitive disadvantage to the larger establishments – ultimately leading to the consolidation of export meat processing to large scale plants, the closure of smaller plants and the loss of valuable and important jobs from some regional communities.

CPSU believes that:

- further analysis and modelling is required from DAFF to ensure that the introduction of a new Australian Meat Export Inspection System and the fees and charges regime does not disadvantage sections of the export meat industry.
- The implementation of the new system will require some flexibility and tailoring to the particular circumstances of establishments – while still seeking to achieve a consistent and high quality inspection system

AQIS Authorised Officers

A key element of the proposed new Australian Meat Export Inspection System is to replace the current AQIS employed Meat Inspectors with a new role – AQIS Authorised Officers (AAO's). These AAO's would be employed by the export meat establishment but act in an official government capacity carrying out inspection duties. AQIS employed meat inspectors and veterinarians would act to verify that AAO's were performing their duties correctly.

This is a major departure from the current tried and tested arrangements where inspection duties are performed by properly qualified Inspectors employed by government – whose role is to apply the inspection standards set by government.

The new Australian Meat Export Inspection System proposal is that the security and certainty that currently comes from having official duties performed by government employees will be provided in the new system. This will occur by having AQIS Meat Inspectors and Veterinarians monitor and verify the work of AAO's. CPSU believes that are substantial barriers to achieving that outcome:

o AAO's will not be independent of their employer.

- AQIS proposes to address the obvious conflict of interest and independence issues through seeking to apply the protections and standards of APS employees to those AAO's as if they were APS employees.
- CPSU doubts the effectiveness of that proposal and believes that consideration should be given to whether legislative or regulatory change would be required to provide AAO's with adequate protections.
- Reduced AQIS staffing numbers, and changes to the duties and responsibilities of Meat Inspectors and Veterinarians, may limit the ability of AQIS employees to meet the verification needs of the new system.
 CPSU believes that AQIS must do more work to ensure that AQIS staffing levels will be adequate to meet the verification demands on the new system.

CPSU is greatly concerned that unless these issues are addressed then the introduction of the AAO role will increase the risk of compromising the inspection standards required by our trading partners.

The CPSU thanks the Committee for the opportunity to comment on these issues.

Yours sincerely

Michael Tull CPSU National President