

As background, Premium Grain Handlers (PGH) is an Australian company, which has been exporting grain in containers for the past 22 years.

PGH is committed to maintaining Australia's high bio-security and export standards, targeting the high value niche international markets for Australian grain. In the interest of ensuring this occurs in an efficient manner, so that our grain industry remains internationally competitive, we would like to propose an addition to the current Authorised Officer (AO) program.

The current AO training process involves a complicated application; a complex personal and on-line training program, followed by an intensive assessment. In our experience the entire process takes at least five months to complete and costs in excess of \$6000 per person. This is a significant investment in an AO, who in addition must also have a high level of computer literacy and an understanding of Australian legislation to be deemed competent.

The high competency requirement for an operator to achieve AO status makes it difficult to train enough operators in a timely manner, particularly given many are not proficient in computer or administrative processes. As a result, the requirement to have sufficient numbers of AO qualified staff so that at least one is always present in a continuous 15 hour per day grain loading operation, is difficult to cost effectively achieve.

To help improve this situation, we propose the introduction of a practical based, low cost two-day grain sampling, grain/container inspection course. This course would be specifically designed to qualify front line operators in those organisations that have existing administrative and fully qualified AO support staff. For example, the inspection requirements for the job would be first determined by an on-site AO, who would instruct the newly qualified operator to perform this task, before the AO then analysed the results and completed the necessary documentation.

We believe that the introduction of this fast, practical course and qualification would allow us to train sufficient numbers of operators at a low cost, to help us uphold the important sampling and inspection applications of bio-security, while allowing AOs to ensure that the broader regulatory and legislative requirements are satisfied.

We trust you will give due consideration to this proposal and we look forward to working with you so that we can together improve the efficiency and effectiveness of our export industry.

Best regards,

John Orr
Manager