



Ref: CSD/GAM1646/gam

1 August 2008

Quarantine and Biosecurity Review Secretariat
Department of Agriculture, Fisheries and Forestry
GPO Box 858
Canberra ACT 2601

SECOND SUBMISSION IN REGARD TO THE QUARANTINE AND BIOSECURITY REVIEW

Subsequent to our initial submission and our subsequent meeting with the Quarantine and Biosecurity Review Panel, ABB Grain Ltd would like to make an additional submission in respect to recommendations that the review panel may wish to consider.

Recommendation 1

That the Australian Government under take a comparison of Australia's current export inspection services against our international competitors, particularly in respect to how services are delivered and the requirements placed on industry to allow Australia to meet its international obligations.

Recommendation 2

The Australian Government reviews the effectiveness of AQIS Export Inspection Services relative to how the service has been delivered in the past and in comparison to other countries through mechanisms such as a review of the outturn status of grain cargoes internationally. Are the protocols implemented by AQIS now and in the past to manage risk in respect to our international obligations appropriate.

Recommendation 3

The Australian Government conducts a review of the current legislation and where necessary make amendments to enhance the ability of AQIS to deliver services through other mechanisms – ie pre-inspection or QA / licence arrangements.

Recommendation 4

Where AQIS seeks legal opinion in respect to the delivery of export programs, this information should be provided to industry.

Recommendation 5

That AQIS and Biosecurity Australia ensure the necessary resources with the appropriate expertise are available to ensure Import Risk Assessments and import / export operations are completely in a timely manner. It is important that staff have the expertise to undertake their roles.

Recommendation 6

The role of AQIS as a facilitator of the export grain trade be reiterated and expanded.

Recommendation 7

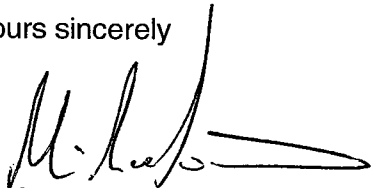
International delegations from AQIS and Biosecurity Australia should include industry representatives.

Recommendation 8

AQIS to be more consultative in its discussions with Industry and decisions should take into account the views of Industry (fits with facilitation role).

I trust this information is of assistance to you in your review of existing Quarantine and Biosecurity arrangements. If you require any further information or would like to discuss any of the issues raised, please contact Mr Geoff Masters (08 8304 5104).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Michael Iwaniw', with a long horizontal stroke extending to the right.

Michael Iwaniw
Managing Director