

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

28 April 2008

Dear Sir

Quarantine and Biosecurity Review

The Tasmanian Freight Logistics Council (TFLC) has agreed to make a submission to the Quarantine and Biosecurity Review on behalf of its many industry members in Tasmania.

The TFLC is a public company managed and operated by industry members whose purpose is to bring shippers, service providers and other stakeholders in the logistic chain into a Tasmanian freight community, whose focus is on actions to improve supply-chain efficiency and performance. The Council's vision is of vibrant, efficient and competitive freight operations into and out of the State, continually improving logistic systems that support increased market competitiveness, new business and investment in more effective supply chains. The achievement of this vision relies on co-operative behaviour that subsequently contributes to significant growth. TasPorts is a member of the Council.

The TFLC's objectives are:-

- Initiate logistic-chain improvements,
- Be a conduit between the freight community and government,
- Facilitate better quality management of supply chains,
- Work collaboratively with the Tasmanian freight community, and.
- Act as a provider of logistic information and related topics.

The TFLC is aware of some of our members concerns about the Australian Quarantine and Inspection Service (AQIS) in Tasmania in particular and would like to bring those concerns to your attention. Whilst it is apparent that some of our members are experiencing difficulties with AQIS, the number is not great – although some of our members appeared to be reluctant to be critical of AQIS for fear of retribution.

The Legislative Framework

It is apparent that the current roles and responsibilities of the Commonwealth and the States are not well understood by many of our members that have to deal with AQIS. The TFLC understands that there is considerable confusion amongst our members on whom and what AQIS is, what AQIS actually do and what AQIS certification involves. It appeared that there are some people who are or who want to be involved in importing and or exporting, or who operate facilities that require AQIS certification to enable them to provide services to clients, but do not know or understand how AQIS is involved.

It also appears that the current roles and responsibilities of the Commonwealth and the States are not operating effectively – and this is particularly so in Tasmania. A lack of AQIS guidelines and the inconsistency in rulings and accountability between different AQIS representatives is particularly frustrating to our members. Most of the inconsistencies relate to compliance and audits. Some companies have more stringent controls required of them by AQIS than other companies who seem to get away without such controls.

A major frustration expressed by many of our members was not being able to speak to a single person in Tasmania who has responsibility and authority to talk to them on AQIS.

Jurisdictional and Institutional Arrangements

The division of roles and responsibilities between government, industry and individuals is not working well in practice. There appears to be little or no accountability within AQIS.

Very few AQIS staff are based in Tasmania visiting Tasmania as and when required. The separation of duties amongst AQIS staff further frustrates our members – AQIS staff dealing with fish can only do fish, those that do dairy can only do dairy and the same applies to meat and vegetables. Why do companies need to deal with a different AQIS representative for fish, dairy, meat and vegetables? In some instances our members need certification from four different areas of AQIS and consequently have to deal with four different people from AQIS. This is particularly cumbersome and difficult for those companies concerned.

The TFLC is aware of an instance when a company sold a business as a going concern that had for many years AQIS accreditation – however, at change-over that accreditation was suddenly void and the purchaser was forced to re-apply for accreditation albeit the business activity had not changed.

Overall TFLC believes the current arrangements are not very efficient or effective for those people who deal with more than one area of food.

Culture, Efficiency and Resourcing

A general comment by our members was that AQIS make it too hard for industry and needs to be more flexible than it currently is. This applies particularly to the export sector. A more critical comment was that it appeared to many of our members that AQIS don't see themselves as part of the value chain.

Many of our members believe that AQIS is a revenue-raising arm of the federal Government – with a frequent comment being that every time AQIS comes in, they charge money.

Our members believe that AQIS needs to ensure that new AQIS staff are experienced or receive an appropriate level of training – otherwise they could make it difficult for exporters.

Communication and Consultation

It is generally believed that there is not enough appropriate and effective communication between AQIS and industry. Many of our members believe that they would benefit if AQIS was able to produce laymen's manuals for the AQIS audit officers so that there is more uniform enforcement of the export orders.

If regulations change in other countries that impact on AQIS areas of responsibility, AQIS is not pro-active in advising local exporters of such changes. Similarly AQIS does not advise local exporters of any changed regulations etc.

If you want any further information on any of the above issues please contact the undersigned.

Yours sincerely

A handwritten signature in black ink that reads "Rob McGuire". The signature is written in a cursive style with a large initial 'R' and a distinct 'M'.

Rob McGuire
Chief Executive Officer