

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

Dear Secretariat

Re: Quarantine and Biosecurity Review

Further to the issue paper dated 14 March 2008, we wish to raise several issues relating to Biosecurity policies in the International Cruise Line business and the impact of risk management on Australian produce sales and export market.

As with all risk management, this must be managed in a way as to minimise harm to Australia and its people, which extends to human health, agriculture, forestry, fisheries and the environment. At the same time we have to be very conscious of the impact of any controls, as they need to be tempered so as not to unnecessarily restrict trade with our nation or adversely affect our trade partners.

Significant operational enterprises that will be affected by tightening of current quarantine regulations are not limited to but include the following:

- Princess Cruises
- Cunard
- P&O Cruises
- P&O Australia
- Holland America Line
- Royal Caribbean Cruises Ltd

We have reviewed the issue paper and have been in consultation with some of our key clients, in particular Princess Cruises ("PC") who operate within the environment under review.

It has been an accepted practice worldwide for PC to ship "stores in – transit" to their vessels in ports all over the world. This practice allows them to maintain a consistent supply of products required to cater for the varying tastes of all of their guests, some of which are not available in Australia.

Just as PC brings in "stores in –transit" they also export from Australia stores to meet their vessels all over the world, and this is steadily increasing in volume.

This business is highly valued and we cannot afford to lose it if it becomes impractical for the vessels to continue this practice. They may very well make a point to buy and load externally, which would be devastating to our business and many other Australian suppliers, breeders and growers in the value chain.

PC is very conscious of food safety standards as their exposure is extremely high due to the nature of their business. We have found their practices to be of the highest standard and would pose a minimal if any Biosecurity risk to Australia. This is quite a valid point as the review document highlights the fact that the Australian

Government needs to take a pragmatic approach to setting standards that allows free trade while limiting risk rather than eliminating it completely.

PC is one of our key clients and the Australian economy is all the better for our involvement in servicing them, as they are a large consumer of Australian grown and produced products, as are all of the cruise businesses listed above.

As the ships operate throughout the world all year round, the potential volume of Australian produce that can be sold and exported is astonishing. We have been working very closely with these companies to increase their awareness of the quality of Australian produce and are successfully increasing business with them.

Given the current status of our agricultural and environmental issues, the support of clients such as PC are vital to the ongoing support and growth of our farming and agricultural industries.

We respectfully request the review board to consider the implications of the current stores – in transit arrangement as it adds much needed exposure to our local produce on the international market.

Kind regards

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