Submission re Export Phytosanitary Standards Consultation

Export Certification Standard
System Overview & Requirements

Page 17 Para 4.5 Cost Recovery Principle

The draft standard provides for cost recovery yet no detail of what the costs are have been provided. The schedule of costs referred to in the standard were to be available from a website address however this address was not provided.

Subsequent enquiries have directed us to the schedule of fees - MAF Cost Recovery Proposal (Plants) www.biosecurity.govt.nz/commercial-exports/plant-exports/fees
Additional to this will no doubt be recovery of the IVA fees resulting from additional audits / surveillance.

One of the key policy principles in reviewing the Standard is to minimise compliance costs. This standard does absolutely nothing to minimise compliance costs – rather it escalates them and even more alarmingly does not provide any benchmark upon which cost recovery can be measured or assessed.

With the integration of Forestry into the Standard we are concerned that there has been insufficient advice available on just what the cost implications will be for the Forestry sector. It would appear by implication that the Forestry sector will be subject to the costs currently incurred by the Plants sector as set out by the Plant Market Access Council. These costs are significantly greater than currently applicable to the Forestry sector and therefore we fail to see how the reviewed Standard is therefore able to meet one of your key policy principles.

The fee structure must be clearly set out and should be a paramount part of the consultation. This standard should not be promulgated until all Forestry stakeholders are advised of the cost recovery being sought, how it will be measured and controlled.

Technical requirements: Phytosanitary Documentation (Phyto Ecert)

Page 3 Para 2 Organisation Requirements

The Standard assumes that the “organisation” will only have one IVA. In the case of Customs Brokers/Freight Forwarders who complete Ecet documentation on behalf of a variety of exporter clientele it would be necessary for the Broker/Forwarder to register with the respective IVA through which the export client was approved.

The problem with this is that in registering with more than one IVA there is the distinct probability that different systems will need to be prepared to meet the different IVA’s requirements and the “organisation” will then be subject to double or triple the number of audits depending on how many IVA’s may be involved.

This will be an unacceptable burden on the Broker/Forwarder organisation and from a cost point of view – certainly not a means of minimising compliance costs which is a key policy principle.