



19 December 2012

Committee Secretary
Senate Rural and Regional Affairs and Transport Legislation Committee
PO Box 6100
Parliament House
CANBERRA ACT 2600

**Inquiry into
the Biosecurity Bill 2012 and the Inspector-General of Biosecurity Bill 2012**

Dear Committee Secretary,

Thank you for the invitation to make a submission on the Biosecurity Bill 2012

Our comments on the draft biosecurity bill are as follows:

1. The Food & Beverage Importers Association (“FBIA”) is an industry association that represents importers into Australia of food and beverages, both retail ready and ingredients for further processing. Members range from large, multi-national companies to small, specialist importers (see attached list of members). Their imports include a wide range of commodities (eg cheese, nuts, vegetables, fruit, seafood, confectionery, oils) and in a range of formats (frozen, fresh, roasted, prepared, and canned).
2. Food imports are subject to biosecurity measures and controls, as well as being subject to the Imported Food Control Act. Many food products may only be imported under permits issued by the Director of Quarantine or a delegate which prescribe biosecurity measures. Indeed, permits to import food would be one of the major categories of permits issued. Our members regularly apply for, and hold, permits issued on behalf of the Director of Quarantine to import food products subject to biosecurity measures.
3. The Association supports the development of modern legislation to underpin the development of a robust, seamless biosecurity system that provides for a flexible, integrated approach along the biosecurity continuum. The Bills under inquiry provide the substantive framework for the reformed biosecurity system and so, in principle, we support the Bills.

Food & Beverage Importers Association

Email: fbia@fbia.org.au 181 Drummond Street,
Telephone: (03) 9639 3644 Carlton, Victoria 3053
Facsimile: (03) 9639 0638 ABN 53 932 472 760



4. The Association is a member of the Industry Working Group on Quarantine (“the IWGQ”) and supports the submission made by the IWGQ to this Inquiry. In particular, we note the concerns about provision of specific legislative instruments for the establishment of Biosecurity Zones, which would replace Quarantine Approved Premises (QAP) currently operating under Section 46A of the Quarantine Act.
5. We recognise that the practical arrangements that affect day to day operations will be detailed in subordinate regulations made under the Bills. Given the importance of the regulations to implementing a responsive, flexible biosecurity system, we trust the development of the regulations will be open to a sustained consultative process.

We appreciate the opportunity to present these comments to the Committee and, should you have any questions on our comments, please do not hesitate to contact me.

Yours faithfully,

Tony Beaver
Director



Members

A.Clouet (Australia)	AB Food & Beverages
APC Logistics	Arquilla Bulk Trading
Argentine Consulate-General	Barilla
Bon Food	Calendar Cheese
Canadian High Commission	Chung's Foods
CONGA Foods	Dried Fruit Specialist
EGTA	F Mayer Imports
Grocery Imports Australia	Fruitmark
Great Ocean	Guzzardi Fine Foods
GAF Foods	Global Resourcing
GB-Commtrade	Gibson Freight
Goodman Fielder	Hunt & Hunt
H.A. Bennett & Sons	Hormel Foods Australia
International Trade Management	Imports of France
Interaust Foods	Jenbray Foods
Juremont Pty Ltd	Kikkoman Australia
Kraft Foods	Langdon Ingredients
Lindt & Sprüngli	M G Kailis
Manassen Foods	Maven Voyage Seafoods
Maxwell Food Products	MWT Foods
National Starch & Chemical	Natural Ingredients
Nestle Australia Ltd	Nybor Holdings
OBM International Trade	Oregon Fruit Company
Oceanic Foods	Orange & Green
Oriental Merchants	Produce Marketing Australia
Riviana Foods	Geodis Wilson
Safcol Australia	Scalzo Food Industries
Simplot Australia	Steritech
Sunrider International	Tandem Imports
Trade Commission of Denmark	Unilever Australasia
USA Agriculture Office	USA Foods
Valcorp Holdings	Woolworths