



Australian Government  
Department of Agriculture,  
Water and the Environment

# Cost recovery implementation statement: grain exports 2021–22



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### Cataloguing data

This publication (and any material sourced from it) should be attributed as: DAWE 2021, *Cost recovery implementation statement: grain exports 2021–22*, Department of Agriculture, Water and the Environment, Canberra, June. CC BY 4.0.

ISBN 978-1-76003-401-6

This publication is available at <https://www.agriculture.gov.au/fees/cost-recovery-2021-22-budget>

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# 1 Introduction

## 1.1 Purpose of this CRIS

This cost recovery implementation statement (CRIS) provides information on how the department implements cost recovery for the grain cost recovery arrangement. It also reports financial and non-financial performance information, contains financial forecasts for 2021–22 and three forward years and details the cost base and pricing structure. It includes updates on the impacts of the Busting Congestion for Agricultural Exporters package and the More Efficient and Sustainable Export Regulation measure announced in the 2020–21 Budget.

The government is investing in modernising and reforming export regulatory services which will impact the cost of delivering those services (known as the cost base) over time. Agriculture and food exporters and producers will be assisted through the modernisation and reform process with a freeze in fees and charges in 2020–21, and stepped increases from 2021–22 to 2023–24. The Australian Government has committed \$71.1 million to improve the financial sustainability of export certification services by supporting a stepped return to full cost recovery and to enable reforms to be rolled out while maintaining existing systems.

The key purpose of this CRIS is to:

- update the grain cost recovery arrangement cost base
- describe the fees and charges for 2021–22 through to 2024–25.

From 2021, the CRIS will be updated annually as described in [section 2](#).

## 1.2 Summary of grain exports regulatory reforms

These reforms are an opportunity for government and industry to work in partnership to lower the cost base of export arrangements. While possible efficiency measures have been identified, the cost reduction of these measures needs to be monitored as measures are implemented and will only be achieved with ongoing efforts from the department and industry. This will require an iterative approach to managing the cost base over the forward estimates. The department will work with industry to achieve these outcomes.

Table 1 shows the impact to expected cost recovered revenue. A permanent reduction in the cost base of \$1.1 million from 2021–22 has been identified since the 2020–21 CRIS. This includes the total additional cost reduction from revised activity and some removed depreciation elements.

**Table 1 Grain export cost recovery arrangement cost base adjustments**

Cost base	Unit	2021–22	2022–23	2023–24	2024–25
2020–21 CRIS starting expense	\$	16,410,556	16,721,532	17,145,016	17,485,532
Cost reductions identified previously	\$	(544,223)	(583,987)	(1,090,281)	(1,110,407)
2020–21 CRIS expense	\$	15,866,333	16,137,545	16,054,735	16,375,125
Additional cost reductions	\$	(991,243)	(1,007,692)	(1,029,353)	(1,051,229)
Depreciation adjustment	\$	(268,377)	(113,452)	(115,546)	(117,680)
2021–22 CRIS expense	\$	14,606,713	15,016,400	14,909,836	15,206,216
Cost recovered revenue	\$	11,569,523	13,701,993	14,794,959	15,061,572
Appropriation funding	\$	3,037,190	1,314,407	n/a	n/a
<b>Total revenue</b>	<b>\$</b>	<b>14,606,713</b>	<b>15,016,400</b>	<b>14,794,959</b>	<b>15,061,572</b>
Appropriation funding as % of expenses	%	21	9	n/a	n/a

n/a Not applicable.

### 1.3 Path to full cost recovery

The More Efficient and Sustainable Export Regulation measure, which is part of the Busting Congestion for Agriculture Exporters package, provides investment of \$71.1 million over 3 years from 2020–21 to 2022–23 to maintain essential export regulatory services across all export cost recovered arrangements while prices will undergo stepped increases.

2020–21 prices were frozen at the 2019–20 prices. From 2021–22, prices will be increased to return all arrangements to full cost recovery in 2023–24.

### 1.4 Reforms: Busting congestion for all agricultural exporters

In the 2020–21 Budget, the Australian Government announced the Busting Congestion for Agricultural Exporters package which includes reforms to slash unnecessary red tape to get products to export markets faster and support jobs in rural and remote Australia.

The package, worth over \$328.4 million over 4 years from 2020–21, includes the following measures that are relevant to this CRIS:

- Digital Services to Take Farmers to Markets measure – this measure will invest \$222.2 million to modernise Australia’s agricultural export systems. The focus will be on helping exporters experience faster and more cost-effective services by transitioning our systems online and providing a single portal for transactions between exporters and government.
- Harmonised and streamlined plant export regulation measure will invest \$10 million to simplify processes for plant product exports, making it easier, cheaper and quicker for plant exporters to get their produce into overseas markets. It will also harmonise regulation for plant industries and streamline plant export audit intervention, making the rules easier to navigate and more consistent. Projected cost reduction for both plant arrangements will amount to \$2.6 million, over 3 years to 2023–24.

## 2 CRIS updates

In accordance with the Australian Government Charging Framework, the grain exports CRIS will be updated annually to report on financial and non-financial performance and revised 4-year forecasts. This annual update will provide an opportunity to measure progress of the reforms as they become quantifiable and to account for any external factors, for example, projected demand for activity.

The department will also report in-year financial performance within the CRIS, periodically reporting performance against the CRIS and explaining any variances. This will provide transparency in reporting for all exporters.

There may be other significant developments warranting a broader review of the cost base or charges. These could include:

- changes to the regulatory settings of the arrangement – for example, through a government policy change or the introduction of new systems or infrastructure
- changes to demand for regulatory activity – for example, due to a large part of industry changing its business model or significant change in terms of trade
- significant changes to financial inputs – for example, changes to the bond rate impacting departmental leave provisions, changes to the department's Comcare premiums or a change to accounting standards.

Where a CRIS update reveals that the existing fee or charge structure no longer meets the financial or regulatory requirements of the arrangement, the department may propose revised fees and charges. In this circumstance, the CRIS update will be the first step in consultation on changes to prices, followed by opportunities for stakeholder engagement.

## 3 Policy and statutory authority to cost recover

Under the Australian Government Charging Framework, cost recovery requires both policy approval and statutory authority. This chapter provides information on government approval of regulatory charging for export regulatory activities and the legislation that enables the department to collect fees and charges.

### 3.1 Why cost recovery is appropriate

Cost recovery (regulatory charging) falls within the Australian Government Charging Framework. The type of charge is determined by the characteristics of the activities as described in the Charging Framework. This provides the overarching framework under which government entities must design, implement and review cost recovery.

Under the Charging Framework, regulatory charging is appropriate because plant export certification activity is provided to a clearly identifiable group – individuals and organisations that participate in the plant export supply chain.

There are additional benefits to funding export certification through regulatory charging. When a business pays for the activities it receives, the government has an obligation to justify the prices it charges. Regulatory charging also raises awareness of regulated entities of how much a regulated activity costs.

For these reasons, the government has determined regulatory charging to be the most appropriate mechanism for funding plant export certification. Regulatory charging of plant export certification activities is consistent with the Charging Framework.

### 3.2 Who will pay the regulatory charges

The department cost recovers regulatory charges in this CRIS from participants in the grain export supply chain, including exporters, producers, third party authorised officers and operators of storage and preparation facilities. Additional information on services provided and the entities are outlined in [section 4.1](#).

### 3.3 Government policy approval to cost recover the regulatory activity

Policy authority for regulatory charging for export certification activities was reaffirmed in the 2020–21 Budget when the government announced the Busting Congestion for Agricultural Exporters package. The package sets out a period of partial cost recovery from 2020–21 to 2022–23 before a return to full cost recovery by 2023–24, while a series of reforms to improve efficiency and lower costs are implemented.

## **3.4 Statutory authority to charge**

### **3.4.1 New legislative framework**

The *Export Control Act 2020* commenced on 28 March 2021, consolidating export functions from the *Export Control Act 1982* and *Australian Meat and Live-stock Industry Act 1997* into a new legislative framework. The new legislation supports existing policy, while providing flexibility for different approaches to the regulation of exports in the future.

### **3.4.2 Cost recovery charges**

Cost recovery charges are imposed under these Acts:

- *Export Charges (Imposition – General) Act 2015*
- *Export Charges (Imposition – Customs) Act 2015*
- *Export Charges (Imposition – Excise) Act 2015.*

Details of specific price points and charges payable are included in these regulations:

- *Export Charges (Imposition – General) Regulations 2021*
- *Export Charges (Imposition – Customs) Regulations 2021.*

### **3.4.3 Cost recovery fees**

Section 399 of the *Export Control Act 2020* provides that the rules may prescribe fees that may be charged in relation to fee-bearing activities carried out by, or on behalf of, the Commonwealth in the performance of functions or the exercise of powers under the Act. The specific fees and price points are set out in the *Export Control (Fees and Payments) Rules 2021*.

## 4 Cost recovery arrangement for grain exports

This section describes the grain exports cost recovery arrangement cost base.

### 4.1 Description of the regulatory activity

Plant export is regulated in accordance with the export legislative framework (see [section 3.4](#)). Plant export certification activity undertaken by the department involves inspection, audit and certification activities with respect to the export of grain and horticulture products. Grain and horticulture products specified in the legislation are:

- prescribed grain
- prescribed hay and straw
- fresh fruit
- fresh vegetables
- other plants or plant products for which a phytosanitary certificate or any other official certificate is required by an importing country authority (e.g. timber products, nuts, nursery stock, tissue cultures, cotton and other grains and seeds not listed here).

The grain and horticulture exports cost recovery arrangements are separate. Our Plant Export Operations branch undertakes export certification activities under both cost recovery arrangements.

Exporters of plants and plant products must obtain an export permit prior to the departure of prescribed goods from Australia. To certify a product's compliance with Australia's export requirements and the importing country requirements, the department undertakes a range of activities, including:

- developing, implementing and monitoring of operational policy and systems that ensure compliance with Australian export controls and any importing country requirements. These activities serve to maintain the eligibility of commodities for export from Australia and to protect and promote Australia's reputation for premium agricultural goods, while maintaining existing and seeking increased market access opportunities
- providing inspection, auditing, and enforcement activities to ensure that the production, storage, handling and transportation of grain and horticulture products intended for export comply with the conditions of the Australian export controls and any additional requirements imposed by an importing country
- issuing permits, phytosanitary certification, and other documentation necessary to confirm compliance with Australian export controls and any additional importing country requirements
- providing support through the department overseas counsellors relating to detained consignments, government certification and other issues that result in goods being held at the border

- providing scientific and technical advice to improve, maintain or restore market access to demonstrate adherence to export requirements
- enforcing regulation of certified organic goods exported from Australia.

For more information, see [Export goods controlled by the department](#).

Plant export certification occurs across both the grain and horticulture cost recovery arrangements.

## 4.2 Cost base

Table 2 shows the grain arrangement cost base for 2021–22. See Table 3 for an overview by cost type for 2021–22.

A detailed description of cost activities and methodology for attributing costs to these activities, see [Appendix A](#).

### 4.2.1 Cost base assumptions

The cost base has been modelled to reflect the full costs of the delivery of regulatory services to support the grain industry. The 2018–19 departmental budget has been used as the starting point for determining the cost base in this CRIS. To project the cost base over the next 4 years, adjustments have been applied to capture expected changes to the costs including:

- inflation of 1.65% per annum, in line with the Department of Finance’s inflation estimate
- increases in employee expenses of 2% per annum, reflecting reasonable estimates of wage increments in line with the Australian Public Service Workplace Bargaining Policy 2018
  - a new Australian Public Service Workplace Relations Policy was released in November 2020 providing that employee salary increases are to be capped at 1.7%. Modelling has not been updated to reflect the revised policy
  - the former Department of Environment and Energy Enterprise Agreement 2016–19, which applies to the department through to 2022, provides for 2% annual increases until the end of the agreement, with the last increase applying in November 2021
  - the CRIS will be updated for 2022–23 to reflect either the November 2020 policy or a revised enterprise agreement, whichever applies at the time
- additional depreciation from new assets anticipated to be recognised over the period
- adjustments for future fee-related activities to reflect expected changes in volume.

### 4.2.2 Projected cost base

The cost base for 2021–22 for the grain exports cost recovery arrangement is \$14.607 million (Table 2), made up of:

- \$10.862 million in levy-related activities
- \$3.745 million in fee-related activities.

**Table 2 Cost base for grain exports cost recovery arrangement, 2021–22**

Charge type	Activity group	Activity	Expense (\$)	Cost recovery charge
<b>Charge</b>	Program management and administration	Workforce and business administration	10,861,728	Annual registration, export documentation, throughput, application and organic certification
		Business system administration		
		Stakeholder engagement		
		Policy and instructional material		
		Business improvement		
	Assurance	Risk management		
		Verification		
		Surveillance		
	Incident management	Incident management		
		Investigative support		
		Corrective action		
<b>Fee for service</b>	Intervention	Assessment	2,443,116	Assessment
		Inspection	291,376	Inspection
		Audit	1,010,493	Audit
<b>Total cost base</b>	–	–	<b>14,606,713</b>	–

Table 3 provides a breakdown of direct and indirect costs for the grain exports cost recovery arrangement in 2021–22.

**Table 3 Cost type breakdown for grain exports cost recovery arrangement, 2021–22**

Expenses	Forecast (\$)
<b>Direct</b>	<b>9,605,841</b>
Employee	8,243,593
Operating	1,318,384
Other	43,863
<b>Indirect</b>	<b>5,000,872</b>
Assurance and Legal	334,673
Corporate Strategy and Governance	567,249
Finance & Business Support	787,337
Information Services	1,907,329
Property	1,404,284
<b>Total</b>	<b>14,606,713</b>

For more information on how expenses are allocated see [Appendix A](#).

## 4.3 Changes to the cost base

This CRIS includes adjustments to the grain exports cost base since 2015–16, when the previous CRIS was implemented.

#### **4.3.1 Expanded cost recovery measure from the 2018–19 Budget**

Expanded cost recovery activities announced in the 2018–19 Budget were implemented from 1 July 2019. This provided authority for additional cost recovery regulatory activities including enforcement, scientific and technical advice, and support for detained consignments which increased the cost base by \$1.0 million indexed annually from 1 July 2019. Charges recover for:

- enforcement activities that are directly related to regulatory function to ensure industry compliance with international import conditions (\$0.429 million indexed annually from 1 July 2019)
- scientific and technical advice related to supporting industry to improve, maintain or restore market access (\$0.5 million indexed annually from 1 July 2019)
- the cost of the department’s overseas counsellor network assisting industry to meet export requirements for detained consignments or during trade disruptions (\$0.1 million indexed annually from 1 July 2019).

#### **4.3.2 Reductions to the cost base since the 2020–21 CRIS**

The 2020–21 grain exports CRIS was used as a starting position for the proposed 2021–22 CRIS cost base. These reductions to the cost base are:

- The staffing profile of the authorised officer program is being implemented more efficiently than previously modelled and requires fewer staff to support grain Authorised Officers, lowering the cost of the program.
- Inspection volumes have decreased as industry continues to adopt the use of third-party authorised officers to undertake inspections under the Authorised Officer program. This has decreased the inspection capability and capacity required to be maintained in the department, which has reduced the cost of grain inspection allocated to the arrangement.
- The export grain and plant product industry’s use of the department’s client contact group is lower than previously modelled. All export arrangement cost bases have been reduced to reflect usage.
- The number of annual establishment registrations were reduced to match current demand and proportionately lowered the number of audits to match, along with the expense for this fee-for-service activity.
- Cost reductions implemented in the 2019–20 internal budget have permanently reduced resourcing against some functions. Fewer officers who are working on maintaining, improving and restoring market access have been allocated to the grain arrangement than was estimated in the previous CRIS, reducing the expense base.
- Following the department’s future department review, a number of structural changes were made to the department that saw some efficiencies created in management lines and oversight. By consolidating operations and integration coordination within the plant exports business structure some efficiencies have been gained and have reduced the expense to the grain arrangement from the service delivery division.
- Corporate and indirect expenses have been reduced in line with the reduction in direct expense. Depreciation expense has also been adjusted to reflect the timing of planned project rollouts.

In line with the government's charging framework and the department's cost allocation policy, inflation and depreciation expenses have been adjusted in the cost base to reflect increased employee and supplier expenses in line with the Australian Public Service Workplace Bargaining Policy 2018 and government inflation estimates. Cost recovery of these activities is considered appropriate because industry directly benefits from having a system in place that allows the department to manage and respond to market access issues, including ensuring compliance with overseas country requirements.

Table 4 outlines the changes to the forecast cost base for 2021–22.

**Table 4 Changes to cost base for grain exports, 2021–22**

Adjustment to cost base	Impact on cost base	Unit	Forecast
<b>Total baseline expense, 2020–21 CRIS</b>	<b>n/a</b>	<b>\$</b>	<b>15,866,333</b>
Additional cost reduction – revised activity levels:			
Efficiency gains in Authorised Officer program management	Decrease	\$	(252,802)
Reduction to inspection volumes – transition to Authorised Officer program	Decrease	\$	(308,000)
Reduction to audit volume – reduced demand in establishment registrations	Decrease	\$	(58,000)
Reduction in general enquiry hotline usage	Decrease	\$	(91,000)
Reduction in market access facilitation capacity	Decrease	\$	(91,000)
Efficiency gains in combining operations management and coordination	Decrease	\$	(55,000)
Reduction in corporate and indirect expense	Decrease	\$	(135,441)
Total cost reduction due to revised activity levels	Decrease	\$	(991,243)
Depreciation adjustment	Decrease	\$	(268,377)
Total adjustments to cost base	Decrease	\$	(1,259,620)
<b>Adjusted cost base</b>	<b>n/a</b>	<b>\$</b>	<b>14,606,713</b>
Change in expense	Decrease	%	(7.9)

n/a Not applicable.

## 4.4 Reforms from 2020–21

### 4.4.1 New export control legislation

As noted at [section 3.4](#), the *Export Control Act 2020* commenced on 28 March 2021, consolidating export functions from the *Export Control Act 1982* into a new legislative framework. No changes to the cost base have been identified at this time as a result of the implementation of the new legislative framework, but changes to the department's regulatory approach could affect cost recovery. Any impacts will be reviewed when or if changes are implemented.

## 5 Design of regulatory charges

This CRIS provides for a mix of regulatory fees-for-service and levies (charges), implemented in the CRIS as charges under the Export Charging Regulations.

Fees for services are used where the regulation is provided directly to an individual or organisation, such as inspections of goods, audit of registered premises or assessment of export certification. These are the intervention activities described at [Appendix A](#).

Cost recovery levies (charges) are imposed when regulation is imposed on an industry sector rather than directly to a specific individual or organisation. These charges recover the costs of maintaining regulatory infrastructure and integrity through the program management and administration, assurance and incident management activities described at [Appendix A](#).

### 5.1 Changes to regulatory fees and charges

No changes to the types of fees and charges or charge points were proposed as part of this CRIS.

Most fees and charges increase to meet the total expense and is consistent with the government's stepped increases to full cost recovery as outlined in the More Efficient and Sustainable Export Regulation measure. The fees and charges take into account the government's appropriation.

### 5.2 Grain exports fees and charges

The amount payable for 2021–22 to 2024–25 is shown in Table 5 to Table 8.

**Table 5 Fees, charges and volumes for grain exports cost recovery arrangement, 2021–22**

Type of charge	Cost recovery charges	Unit	Price (\$)	Estimated volume (units)	Estimated total revenue (\$)
<b>Charges</b>	Establishment registration – simple	Annual	2,906	478	1,389,068
	Establishment registration – complex	Annual	5,812	15	87,180
	Authorised Officer approval	Annual	727	1,000	727,000
	Export volume – grain and related products rate	Per tonne (or part thereof)	0.11	40,859,547	4,494,550
	Phytosanitary certificate	Per certificate	34	55,414	1,884,076
	Establishment application (one-off)	Per application	581	23	13,363
<b>Fees – audit and inspection</b>	Audit	Per quarter hour	35	22,868	800,380
	Inspection	Per quarter hour	35	6,594	230,790
	Additional inspection	Per quarter hour	73	–	–
<b>Fees – documentation</b>	Document electronic	Per document	12	109,523	1,314,276
	Manual document	Per document	97	1	97
	Replacement certificate	Per replacement	533	45	23,985

Type of charge	Cost recovery charges	Unit	Price (\$)	Estimated volume (units)	Estimated total revenue (\$)
<b>Fees – Authorised Officer</b>	Authorised Officer application fee	Per application	242	219	52,998
	Authorised Officer approval	Per approval	242	650	157,300
	Authorised Officer learning and assessment	Per person delivered training	1,695	228	386,460
	Additional Authorised Officer learning and assessment	Per person delivered additional training	1,937	–	–
<b>Organics a</b>	Organic certifying organisation	Annual	8,000	1	8,000
<b>Total</b>	–	–	–	–	<b>11,569,523</b>

a Organic certifiers support a small number of exporters in all of the export arrangements (excluding Live Animal Exports) and therefore the expense has been reflected in each CRIS.

Note: Prices have been rounded. The annual charge will be rounded upwards to the nearest dollar, with the exception of throughput, which will be rounded upwards to the nearest cent.

**Table 6 Fees, charges and volumes for grain exports cost recovery arrangement, 2022–23**

Type of charge	Cost recovery charges	Unit	Price (\$)	Estimated volume (units)	Estimated total revenue (\$)
<b>Charges</b>	Establishment registration – simple	Annual	3,492	478	1,669,176
	Establishment registration – complex	Annual	6,985	15	104,775
	Authorised Officer approval	Annual	873	1,000	873,000
	Export volume – grain and related products rate	Per tonne (or part thereof)	0.13	40,859,547	5,311,741
	Phytosanitary certificate	Per certificate	40	55,414	2,216,560
	Establishment application (one-off)	Per application	698	23	16,054
<b>Fees – audit and inspection</b>	Audit	Per quarter hour	42	22,616	949,872
	Inspection	Per quarter hour	42	6,594	276,948
	Additional inspection	Per quarter hour	87	–	–
<b>Fees – documentation</b>	Document electronic	Per document	14	109,523	1,533,322
	Manual document	Per document	116	1	116
	Replacement certificate	Per replacement	552	45	24,840
<b>Fees – Authorised Officer</b>	Authorised Officer application fee	Per application	291	219	63,729
	Authorised Officer approval	Per approval	291	650	189,150
	Authorised Officer learning and assessment	Per person delivered training	2,037	228	464,436

Type of charge	Cost recovery charges	Unit	Price (\$)	Estimated volume (units)	Estimated total revenue (\$)
	Additional Authorised Officer learning and assessment	Per person delivered additional training	2,328	–	–
<b>Organics a</b>	Organic certifying organisation	Annual	8,274	1	8,274
<b>Total</b>	–	–	–	–	<b>13,701,993</b>

**a** Organic certifiers support a small number of exporters in all of the export arrangements (excluding Live Animal Exports) and therefore the expense has been reflected in each CRIS.

Note: Prices have been rounded. The annual charge will be rounded upwards to the nearest dollar, with the exception of throughput, which will be rounded upwards to the nearest cent.

**Table 7 Fees, charges and volumes for grain exports cost recovery arrangement, 2023–24**

Type of charge	Cost recovery charges	Unit	Price (\$)	Estimated volume (units)	Estimated total revenue (\$)
<b>Charges</b>	Establishment registration – simple	Annual	3,855	478	1,842,690
	Establishment registration – complex	Annual	7,709	15	115,635
	Authorised Officer approval	Annual	964	1,000	964,000
	Export volume – grain and related products rate	Per tonne (or part thereof)	0.14	40,859,547	5,720,337
	Phytosanitary certificate	Per certificate	44	55,414	2,438,216
	Establishment application (one-off)	Per application	771	23	17,733
<b>Fees – audit and inspection</b>	Audit	Per quarter hour	46	20,104	924,784
	Inspection	Per quarter hour	46	6,594	303,324
	Additional inspection	Per quarter hour	96	–	–
<b>Fees – documentation</b>	Document electronic	Per document	15	109,523	1,642,845
	Manual document	Per document	128	1	128
	Replacement certificate	Per replacement	563	45	25,335
<b>Fees – Authorised Officer</b>	Authorised Officer application fee	Per application	321	219	70,299
	Authorised Officer approval	Per approval	321	650	208,650
	Authorised Officer learning and assessment	Per person delivered training	2,248	228	512,544
	Additional Authorised Officer learning and assessment	Per person delivered additional training	2,570	–	–
<b>Organics a</b>	Organic certifying organisation	Annual	8,439	1	8,439

Type of charge	Cost recovery charges	Unit	Price (\$)	Estimated volume (units)	Estimated total revenue (\$)
<b>Total</b>	–	–	–	–	<b>14,794,959</b>

**a** Organic certifiers support a small number of exporters in all of the export arrangements (excluding Live Animal Exports) and therefore the expense has been reflected in each CRIS.

Note: Prices have been rounded. The annual charge will be rounded upwards to the nearest dollar, with the exception of throughput, which will be rounded upwards to the nearest cent.

**Table 8 Fees, charges and volumes for grain exports cost recovery arrangement, 2024–25**

Type of charge	Cost recovery charges	Unit	Price (\$)	Estimated volume (units)	Estimated total revenue (\$)
<b>Charges</b>	Establishment registration – simple	Annual	3,931	478	1,879,018
	Establishment registration – complex	Annual	7,862	15	117,930
	Authorised Officer approval	Annual	983	1,000	983,000
	Export volume – grain and related products rate	Per tonne (or part thereof)	0.14	40,859,547	5,720,337
	Phytosanitary certificate	Per certificate	45	55,414	2,493,630
<b>Fees – audit and inspection</b>	Establishment application (one-off)	Per application	786	26	18,078
	Audit	Per quarter hour	47	20,104	944,888
	Inspection	Per quarter hour	47	6,594	309,918
	Additional inspection	Per quarter hour	98	–	–
<b>Fees – documentation</b>	Document electronic	Per document	16	109,523	1,752,368
	Manual document	Per document	131	1	131
	Replacement certificate	Per replacement	574	45	25,830
<b>Fees – Authorised Officer</b>	Authorised Officer application fee	Per application	328	219	71,832
	Authorised Officer approval	Per approval	328	650	213,200
	Authorised Officer learning and assessment	Per person delivered training	2,293	228	522,804
	Additional Authorised Officer learning and assessment	Per person delivered additional training	2,621	–	–
<b>Organics a</b>	Organic certifying organisation	Annual	8,608	1	8,608
<b>Total</b>	–	–	–	–	<b>15,061,572</b>

**a** Organic certifiers support a small number of exporters in all of the export arrangements (excluding Live Animal Exports) and therefore the expense has been reflected in each CRIS.

Note: Prices have been rounded. The annual charge will be rounded upwards to the nearest dollar, with the exception of throughput, which will be rounded upwards to the nearest cent.

## 6 Stakeholder engagement

Stakeholder engagement plays an important role in the development and management of cost recovery arrangements. The department's stakeholders have a unique insight into how the department's regulatory activities impact on their business and help the department design efficient cost recovery frameworks for these activities.

### 6.1 Stakeholder engagement strategy

#### 6.1.1 Purpose

This stakeholder engagement strategy for the cost recovery of grain exports regulatory activities outlines the engagement principles, method and approach. The purpose of the strategy is to work with industry to update the CRIS as needed and provide information on the performance of the cost recovery arrangement.

This strategy helps the department to plan, design, undertake and evaluate stakeholder engagement activities.

It has been designed to meet the requirements of the:

- Australian Government Charging Framework
- Australian Government Guide to Regulation
- APS Framework for Engagement and Participation.

#### 6.1.2 Principles

The department's principles for engagement are to listen and engage meaningfully.

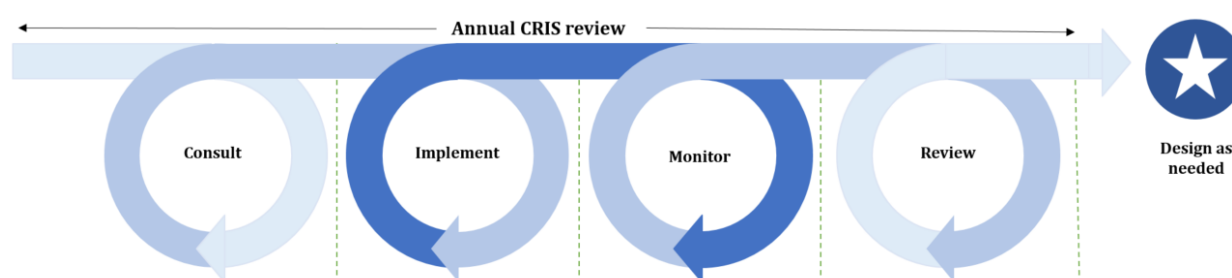
The department will achieve this by:

- clearly explaining the objective and context of stakeholder engagement
- being honest about what is on the table, that is, what is yet to be decided and what has already been decided
- providing sufficient time for stakeholders to engage in consultation processes
- ensuring information that is essential to participant's roles is made available to them
- providing feedback on how feedback has been taken into consideration.

#### 6.1.3 Method

The department plans to consult on, implement, monitor and review regulatory charging through annual CRIS reviews.

The department will also design revised fees and charges in the CRIS documents as needed.

**Figure 1 Engagement process**


Throughout this process, the department will use 2 different levels of engagement:

- 1) share – when government needs to tell the public about a government initiative
- 2) consult – when government gathers feedback from specific industry groups about a problem or a solution.

### 6.1.4 Approach

The department's engagement approach is outlined in Table 9.

**Table 9 The department's approach to stakeholder engagement for regulatory charging**

Category	Consult annually	Implement annually	Monitor annually	Review annually	Design as needed
<b>Objective</b>	Public consultation to seek feedback on annual updates to the proposed cost base, fees and charges in the draft CRIS.	Publish public information to prepare stakeholders for upcoming changes to regulatory charging.	Publish information on prior year financial and non-financial performance of regulatory charging.	Consultation to seek feedback on regulatory charging performance and stakeholder engagement.	Targeted consultation to seek advice and input on behalf of their industries to develop volume, expense and pricing models.
<b>Level of engagement</b>	Consult	Share	Share	Consult	Consult
<b>Timing</b>	Annually in first quarter of the year.	Annually in June.	Annually in October.	As needed or for the Portfolio Charging Review in 2023.	As needed.
<b>Stakeholders</b>	Industry Consultative Committees (ICCs). All industry participants. Peak industry bodies.	All industry participants. Peak industry bodies.	Industry consultative committees (ICCs). All industry participants. Peak industry bodies.	Industry consultative committees (ICCs). All industry participants. Peak industry bodies.	Industry consultative committees (ICCs). Peak industry bodies.
<b>Method</b>	Online – Have Your Say. Face to face.	Industry advice notices (IANs). Online – department website.	Online – department website.	Online – Have Your Say.	Face to face. Teleconference.

## **6.2 Industry engagement**

### **6.2.1 Summary CRIS related industry engagement activities**

The department has been formally engaging with industry on charging arrangements since 2018, including regular engagement on the CRIS with the Grain and Plant Products Exports Industry Consultative Committee (GPPEICC).

A CRIS was released for public submissions between October 2019 and January 2020, supported by meetings with the GPPEICC and 13 public meetings with export stakeholders. The department received 8 submissions on the grain arrangement. Outcomes of this engagement informed government consideration of export cost recovery generally, including the Busting Congestion for Agricultural Exporters package.

In February 2021, the grain exports CRIS was published to provide stakeholders with a description of the impact of the Busting Congestion package and the intention to freeze fees and charges in 2020–21, followed by stepped increases from 2021–22 to achieve full cost recovery by 2023–24.

A 2021–22 CRIS was released seeking public submissions between 14 May and 10 June 2021, supported by engagement with industry consultative committees and targeted discussions with industry stakeholders through virtual presentations and feedback sessions. The department received 3 submissions from the grain export industry.

As part of the ongoing development of streamlined cost recovery arrangements for export certification, the department will continue to engage with industry stakeholders on an ongoing basis.

A summary of key themes from stakeholder feedback across all consultations since 2018 is provided at [Appendix B](#).

## 7 Risk assessment

A charging risk assessment (CRA) is required for any regulatory charging policy proposal, such as a CRIS. It helps to identify and analyse regulatory charging risks. The Minister for Agriculture, Drought and Emergency Management must agree to release the final CRIS given the CRA indicates that it is medium risk.

The CRA has identified 2 implementation categories that are considered high risk:

- the percentage change in annual cost recovery revenue is greater than 10%
- the introduction of new cost recoverable activities.

The remaining implementation categories are considered low to medium risk:

- the total annual cost recovery revenue is greater than \$10 million but less than \$20 million
- change in the level of existing cost recovery charges
- the imposition of the cost recovery charges does not involve an Act of parliament
- the proposal including no involvement with other Commonwealth, state or local government entities
- the expected impact of cost recovery on payers
- stakeholder sensitivity about the proposed changes.

In addition to the CRA, the department has also considered a number of risks associated with cost recovering grain exports certification activities and how the department will manage these risks (Table 10).

**Table 10 Risks – grain exports cost recovery arrangement**

Risk	Management
The cost of export certification affects industry competitiveness.	The department is implementing a range of reforms to deliver efficiencies in export certification processes.
The fee and charge structure does not support future regulatory reforms.	The CRIS will be reviewed annually which will provide an assessment as to whether fees and charges should be revised.
Changes to government policy and activities.	Regular assessments of the arrangement will inform whether a cost recovery review is required.
Importing countries change export certification requirements – the cost of providing certification no longer reflects forecast effort.	Regular assessments of the arrangement will inform whether a cost recovery review is required.
Deficit occurs. For example, unfavourable farming conditions.	The department will engage with industry to discuss options to reduce expenses through adjustments to services or service standards.
Significant surplus occurs. For example, entry to a new market or favourable farming conditions.	Subject to approval, collection of revenue in surplus of expense may be managed through remittance, or investment initiatives directly benefiting activities within the arrangement. An alternative approach may be agreed with industry within policy guidelines.

<b>Risk</b>	<b>Management</b>
Changing events impact actual revenue versus forecast revenue.	The department will update the CRIS annually to monitor changes in activity and effort and assess the need for consequential changes in the cost and price.

## 8 Financial estimates

### 8.1 Financial estimates

The financial estimates of the grain exports cost recovery arrangement is provided at Table 11. There will be no change to the cost recovery reserve and the reserve deficit is intended to be carried forward until a government decision is taken to address it.

**Table 11 Financial estimates for grain exports cost recovery arrangement**

Finance element	2021–22 (\$)	2022–23 (\$)	2023–24 (\$)	2024–25 (\$)
Revenue = X	11,569,523	13,701,993	14,794,959	15,061,572
Expenses = Y	14,606,713	15,016,400	14,909,836	15,206,216
<b>Balance = X – Y</b>	<b>(3,037,189)</b>	<b>(1,314,407)</b>	<b>(114,877)</b>	<b>(144,645)</b>
Appropriation funding	3,037,189	1,314,407	n/a	n/a
Balance after appropriation	–	–	(114,877)	(144,645)
Forecast opening cost recovery reserve balance	(1,214,549)	(1,214,549)	(1,214,549)	(1,329,426)
Transfer	–	–	(114,877)	(144,645)
<b>Forecast closing cost recovery reserve balance</b>	<b>(1,214,549)</b>	<b>(1,214,549)</b>	<b>(1,329,426)</b>	<b>(1,474,071)</b>

n/a Not applicable.

### 8.2 Cost recovery reserve

A cost recovery reserve is maintained for each of the agriculture and food exports charging arrangements. The department's policy is to maintain a balance of between zero and five per cent of annual program expenditure in the reserve for each arrangement. Close management of the financial performance of arrangements may lead to more frequent adjustments to charges, including to reduce a reserve surplus.

At the time of CRIS release, the grain exports reserve is in deficit. Fees and charges have not been modelled to recover this deficit. The More Efficient and Sustainable Export Regulation measure provides investment of \$71.1 million over 3 years from 2020–21 to 2022–23 to maintain essential export regulatory services across all export cost recovery arrangements while prices are gradually increased. This is intended to maintain the deficit at its current level until the government makes a decision to address the deficit.

## 9 Financial and non-financial performance

Both the Australian National Audit Office's report on the application of cost recovery principles and the independent review of the cost of export certification make recommendations about improving the department's performance reporting.

The department is committed to consulting with industry stakeholders on performance indicators to assist in evaluating the performance of the department's regulatory arrangements. The department will use the benchmarking framework provided by the independent review to engage with industry on development of financial and non-financial Key Performance Indicators (KPIs).

This section presents information on the financial and non-financial performance of the grain exports cost recovery arrangement. This is intended to provide an overview of the department's performance in recovering forecasted costs and meeting regulatory objectives.

### 9.1 Financial performance

The financial performance for the grain exports cost recovery arrangement is provided in Table 12.

**Table 12 Financial performance for grain exports cost recovery arrangement, 2017–18 to 2020–21**

Finance element	2017–18 (\$)	2018–19 (\$)	2019–20 (\$)	2020–21 f (\$)
Revenue = X	15,128,807	11,641,099	10,110,020	12,243,179
Expenses = Y	17,353,875	14,337,997	12,848,167	12,895,689
<b>Balance = X – Y</b>	<b>(2,225,068)</b>	<b>(2,696,898)</b>	<b>(2,738,147)</b>	<b>(652,510)</b>
Remissions, Rebates & Adjustments = Z	(290,495)	n/a	n/a	652,510
Net Balance = Balance + Z	(2,515,563)	(2,696,898)	(2,738,147)	–
<b>Cost recovery reserve balance</b>	<b>4,220,496</b>	<b>1,523,598</b>	<b>(1,214,549)</b>	<b>(1,214,549)</b>

n/a Not applicable. f Forecast.

Note: Annual revenue has varied due to climate conditions, which resulted in favourable crop returns in 2016–17 and poor returns in 2018–19. Inspection revenue continues to reduce as industry increases their use of third-party authorised officer to undertake inspections under the Authorised Officer program. This has decreased the inspection capability and capacity required to be maintained in the department, which has reduced the cost of grain inspection allocated to the arrangement. This has been partly offset by increased spending in program management and administration, including information services costs associated with the department's service delivery modernisation program, corporate costs and property costs. From 1 July 2019, \$1.032 million for regulatory activities for enforcement, scientific and technical advice and detained consignments was added to the arrangement, indexed and ongoing.

### 9.2 Non-financial performance

Over the life of this CRIS, the department intends to consult with industry stakeholders on non-financial performance indicators to assist in evaluating performance of the cost recovery

arrangements administered. This CRIS will be updated as performance indicators are refined and further developed.

## 10 Key dates and events

Regular reviews of financial performance are undertaken and regular stakeholder engagement activities are conducted throughout the CRIS cycle in line with the stakeholder engagement strategy documented in [Section 6](#). Key forward dates for regulatory charging for grain exports certification activities are documented in Table 13.

**Table 13 Key forward dates and events**

Key forward events schedule	Next scheduled update
Annual CRIS update to forward estimates	May 2021
2021–22 CRIS published	June 2021
Updated fees and charges implemented	1 July 2021
Annual CRIS updates to financial and non-financial performance for 2020–21	October 2021
Annual CRIS update to forward estimates	February 2022
Updated fees and charges implemented	1 July 2022
Annual CRIS updates to financial and non-financial performance for 2021–22	October 2022
Portfolio charging review to be undertaken	2023
Annual CRIS update to forward estimates	February 2023
Updated fees and charges implemented	1 July 2023
Annual CRIS updates to financial and non-financial performance for 2022–23	October 2023
Portfolio charging review outcomes to be brought forward in Budget	2024–25

# 11 CRIS approval and change register

Table 14 tracks the changes to the CRIS as a result of changes to the regulatory charging activity.

**Table 14 CRIS approval and change register**

Date of CRIS Change	CRIS Change	Approver	Basis for change
11/06/2021	Certification of the CRIS	Secretary, Department of Agriculture, Water and the Environment	New regulatory charging activity and revalidation of cost model
15/06/2021	Approval of CRIS	Minister for Agriculture, Drought and Emergency Management	New regulatory charging activity and revalidation of cost model

# Appendix A: Cost recovery model

## Outputs and business processes of the regulatory charging activity

The key policy objectives for the department's cost recovery arrangements are to:

- safeguard Australia's animal and plant health status, to maintain overseas markets and protect the economy and environment from the impact of exotic pests and diseases. This will be achieved through risk assessment, inspection and certification, and the implementation of emergency response arrangements for Australian agricultural, food and fibre industries
- support more sustainable, productive, internationally competitive, and profitable Australian agricultural, food and fibre industries through policies and initiatives that promote better resource management practices, innovation, self-reliance and improved market access.

Our cost recovery arrangements describe how the department uses resources (such as people, IT, property and equipment) to undertake business processes (regulatory activities), which enable the department to provide the outputs that meet the department's policy objectives (Figure A1).

**Figure A1 Outputs and business processes of the department's regulatory charging activity**

Resources	Business processes (regulatory activity)	Outputs
<ul style="list-style-type: none"> <li>• Human resources</li> <li>• Information system resources</li> <li>• Properties</li> <li>• Equipment</li> <li>• Telecommunication systems</li> <li>• Other tangible resources such as fleet vehicles and equipment</li> <li>• Other intangible resources such as intellectual property</li> </ul>	<ul style="list-style-type: none"> <li>• Workforce and business management</li> <li>• Business systems administration</li> <li>• Stakeholder engagement</li> <li>• Policy and instructional material</li> <li>• Business improvement</li> <li>• Risk management</li> <li>• Verification</li> <li>• Incident management</li> <li>• Investigation support</li> <li>• Corrective action</li> <li>• Inspection</li> <li>• Assessment</li> <li>• Audit</li> </ul>	<ul style="list-style-type: none"> <li>• Annual registration</li> <li>• Export documentation</li> <li>• Licence</li> <li>• Application</li> <li>• Inspection</li> <li>• Assessment</li> <li>• Audit</li> </ul>

The processes listed in Figure A2 are described below and are grouped into 4 categories of activities:

- 1) Program management and administration – administrative activities that support and deliver the department's export certification commitments.
- 2) Assurance – activities that mitigate risks to collective user groups by assessing departmental controls of systems and processes to ensure they operate in accordance with their intended design.

- 3) Incident management – activities that respond to incidents concerning alleged breaches of Australian regulation or international import conditions.
- 4) Intervention – activities provided directly to an individual, business or organisation to meet export certification requirements.

## Costs of regulatory charging activity

### Cost allocation process

To determine the cost of regulatory activities, the department uses an activity-based costing (ABC) system. The ABC cost allocation methodology reflects costs incurred through usage of regulatory activities. This provides a transparent allocation of costs that is also efficient and effective to administer.

The 2 expense categories are:

- 1) Direct expenses – these can be directly attributed to the provision of an activity, for example, inspections. They comprise of staff salaries and supplier costs including direct capital expenses.
- 2) Indirect expenses – these are not directly linked to an activity provided by us. Indirect expenses include corporate employee salaries and overheads such as information technology, finance, human resources costs, and indirect capital expenses.

The cost allocation process apportions the costs of support functions (indirect expense) and direct expense to the processes/activities defined below under [Description of cost model activities](#). The department includes indirect expenses in the cost base to reflect the systems and processes that exist to help with efficient administration, which the cost-recovered arrangements benefit from. This is the same methodology employed for allocation of indirect costs to appropriated activities, in line with the department's cost allocation policy.

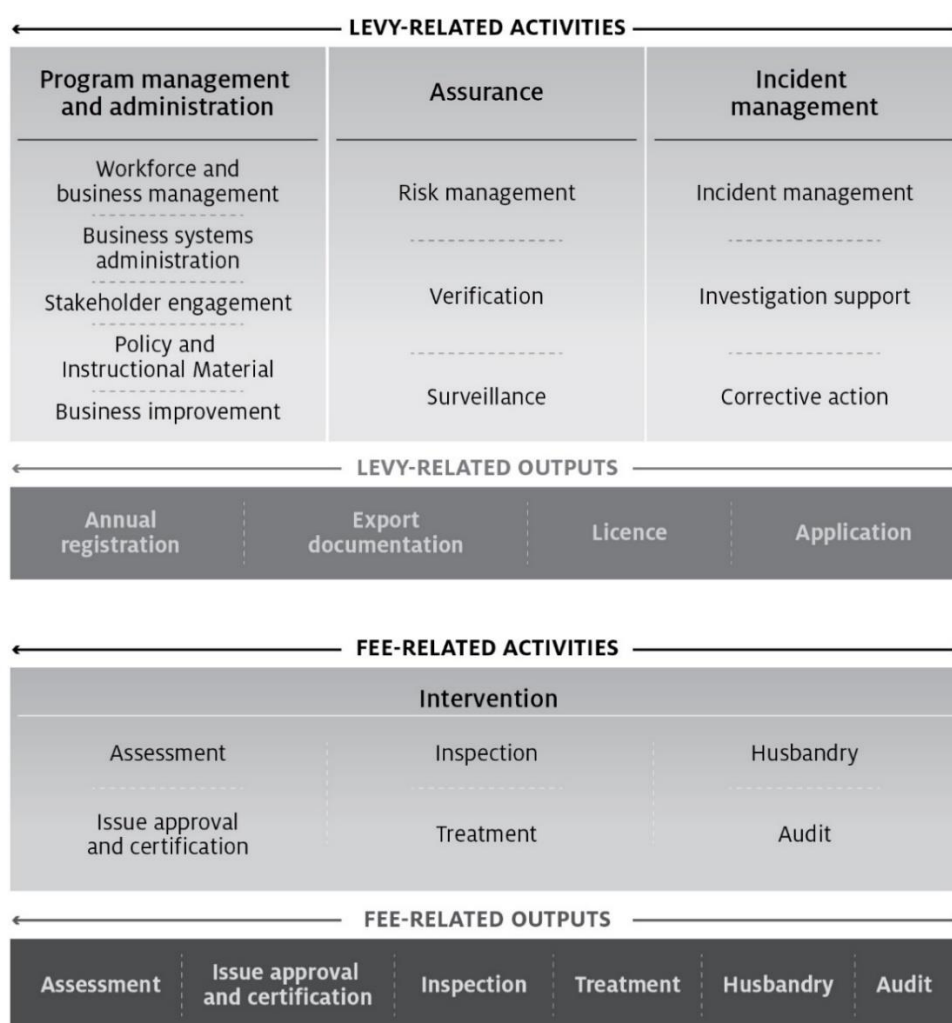
The ABC system allocates costs in a staged approach:

- 1) Indirect costs such as property, finance, information technology, human resources and divisional executives are allocated to direct cost centres using a cost driver which estimates the relative usage of each of the corporate services. Cost drivers for corporate services include:
  - a) Workpoints – distributes costs based on space occupied, with the workpoint count reflecting the space where a person may be able to work.
  - b) FTE – distributes costs based on each program's full-time equivalent staff numbers.
  - c) PC count/IT assets – distributes costs based on the number of IT assets in a program.
  - d) Transactions – distributes costs based on the number of transactions incurred over a period. This driver is used to allocate expenses related to the functions of accounts receivable and accounts payable.
  - e) Headcount – allocates costs based on the number of staff that a program area has as a proportion of the number of staff that are on the department's total staff.
  - f) Custom drivers – allocate costs to specific cost centres, primarily based on usage for shared program resources.

Cost drivers are reviewed on an annual basis, or as required. Changes to cost drivers are substantiated through effort or other data.

- 3) Direct costs (including the indirect costs allocated in step 1) are allocated to the activity and cost-recovered arrangements that best reflects the activity undertaken. Time recording systems allow the accurate allocation of effort to specific activities and arrangements, particularly to intervention activities. The primary variable used in the allocation of costs to activities is effort. As a result, cost estimates vary with changes in activity. If actual activity levels change during a financial year, the costs allocated to arrangements would require adjustment to align with that effort. The department monitors this throughout the year and adjusts where necessary. For example, auditors undertake audits across multiple arrangements. The department forecasts the number of audits and average time for an audit for each arrangement. The associated costs are allocated to the arrangements and audit function based on total audit hours.
- 4) Activity/arrangement costs (from step 2) are allocated to charge points which identify the cost associated with that charge. The department uses a combination of cost recovery fees and charges. Figure A2 shows how the department categorises cost-recovered charge and fee activities and outputs.

**Figure A2 Categories of activities**



## **Description of cost model activities**

This section provides details of the cost model activities undertaken in the department's cost recovery arrangements.

### **Program management and administration activities**

#### **Workforce and business management**

This activity comprises 4 categories:

- 1) Workforce management activities include staff supervision, allocating workforce resources, managing employee performance, leave, training and other conditions, managing Work, Health and Safety requirements, recruitment and termination.
- 2) Business management activities include business planning and continuity; requesting legal advice; procurement and contracts; program and project administration, assurance, design and management; management of fixtures, facilities, equipment, supplies and logistics.
- 3) Financial management activities include billing and accounting, budgeting, charges and payments, collections and receivables, debt management, financial accounts, reporting and policy development.
- 4) Information management activities include data management, information and records management, and information sharing and collaboration.

#### **Business systems administration**

Includes developing, acquiring, testing, implementing and supporting applications and business systems. It encompasses technical support and maintenance of all business systems including information and communications technology.

#### **Stakeholder engagement**

Involves proactive engagement with any person, business, or organisation including any associated travel. This includes, engaging with peak industry bodies, secretariat support and attendance at industry consultative committee meetings, consultation on new standards and requirements, publishing website content and other information.

#### **Policy and instructional material**

Includes developing, maintaining and communicating the department's policy and instructional material, such as operational and corporate policies, scientific advice, departmental guidelines and work instructions, and associated training development and delivery. Examples include responding to changes in importing country requirements developing or revising policy processes and instructional material.

#### **Business improvement**

Includes assessment, monitoring and development of initiatives to improve performance. Examples include adjustments to improve program and service delivery, business performance reports against KPIs and similar activities.

## **Assurance activities**

### **Risk management**

Involves assessing and managing the risks posed to Australia's ability to maintain market access. This includes communicating results of risk analysis, modelling and forecasting to operational areas and the collection, receipt and use of reliable compliance data to meet the department's compliance objectives. This work also includes any associated travel and client assistance work.

### **Verification**

Includes assurance activities to provide stakeholders and the departmental executive with confidence that departmental controls of its systems and processes are operating in accordance with their intended design and associated documentation. This includes assurance activities provided to trading partners.

### **Surveillance**

Includes formal and informal monitoring to detect issues that may affect onshore production for export, such as changes in Australia's pest or disease status or food safety concerns. Surveillance differs from an inspection because it is not done for a specific client.

## **Incident management activities**

### **Incident management**

The coordination and management of any incident, including post-border detection and export incidents. This includes all associated preparatory work and post work, travel and client assistance in relation to an incident.

### **Investigation Support**

Involves providing support for enforcement activities relating to an alleged breach of portfolio legislation, including any related client assistance and travel. This also includes enforcement activities that ensure compliance with Australian regulation and international import conditions such as investigations and engagement with clients about compliance.

### **Corrective action**

Includes actions taken in response to non-compliance or contravention of legislation that is not required to be reported to enforcement officers. Corrective action activities includes all preparatory work and post work, travel and client assistance in relation to the enforcement process.

## **Intervention activities**

### **Assessment**

Involves assessing information to determine if it meets Australian standards and legislation, international conventions and importing country conditions. This includes all preparatory work (such as confirming importing country or export requirements) and post work (such as assessment report preparation), travel and client assistance in relation to the assessment. Examples include assessments of licences, permits, registrations or accreditations.

### **Issue approvals and certification**

Includes issuing of a decision in relation to an assessment for cargo, vessels, plants, animals, food, biological and genetic material. This includes the work from the end of the assessment period to the completion of the decision notification process to support issuance of appropriate export documentation.

### **Inspection**

Involves the physical examination and supervision of an export consignment of plants or plant products to determine compliance with Australian standards and legislation, international conventions and importing country conditions.

### **Treatments**

Includes the physical treatment of cargo, vessels, plants, animals, food, biological and genetic material, other conveyances or premises to prevent an adverse biosecurity outcome from occurring and to meet relevant importing country requirements.

### **Husbandry**

Includes activities relating to the care of plants and animals that the department is responsible for, including transport of plants and animals, housing, daily monitoring, feeding, cleaning of facilities, administering of medication, bookings and client assistance.

### **Audit**

Includes the systematic and functionally independent examination of industry systems and processes to determine whether activities and related results comply with legislative or documented requirements. This includes all preparatory work and post work, travel and client assistance in relation to the audit.

# Appendix B: Summary of grain export stakeholder feedback

The key themes of feedback are covered in Table B1.

**Table B1 Stakeholder feedback summary**

Key theme	Department response
<p><b>1) Opposition to full cost recovery</b></p> <p>The government has endorsed the goal of making agriculture a \$100 billion industry by 2030. Survey respondents have the view that full cost recovery is a hindrance to achieving this goal, and that the CRIS is a strong disincentive to export and will have a significant negative effect on Australian international competitiveness.</p>	<p>The Australian Government's policy on cost recovery is articulated in the Australian Government Charging Framework.</p> <p>A strong regulatory system underpins Australia's reputation as a high-quality supplier that enables our exporters to meet importing country requirements.</p>
<p><b>2) Cost allocation</b></p> <p>Concerns in relation to the way in which costs have been allocated to charge points</p>	<p>Stakeholders asked for more detailed information about costs allocation to charge points. The department has provided additional detail on this request and will continue to refine the provision of information through the department's regular stakeholder forums / consultative committees and the annual CRIS reviews.</p>
<p><b>3) Concern with the increase in the cost base and whether the department is looking at finding efficiencies</b></p> <p>Stakeholders were concerned that cost base seem to be growing when exporters were doing less. There was an expectation that departmental regulatory cost would reduce not increase. The department should be looking to find efficiencies to drive their cost down.</p>	<p>Regulatory fees and charges for the exporter sector have not increased in a long time, and most export programs have been under-recovering. The last time fees and charges were increased, for some agricultural exports, was in 2018, some prices have stayed the same as far back as 2009, and they are no longer reflective of the true regulatory cost.</p> <p>The government is now seeking to apply a stepped return to full cost recovery by 2023–24 for its regulatory activities, a stepped return eases the impact for agriculture and food exporters.</p> <p>Even with increased fees and charges, the cost of regulatory services is less than one per cent of export value in most cases.</p>
<p><b>4) Impact of price increases on smaller operators</b></p> <p>Stakeholders raised concerns about the impact of price increases on smaller operators, being concerned that they are bearing a disproportionate proportion of the cost increases compared to larger operators with higher throughput.</p>	<p>The cost to regulate small versus large operators is not directly related to the size of the entity as the regulatory support activities are developed and implemented to support both, regardless of size. Most CRIS already have a mix of annual and throughput-base charges where appropriate, including by providing price differentiation on annual charges for different types or sizes of operators, per consignment charges or charging by volume of exports (e.g. tonnage or per head).</p> <p>The department will continue to engage with industry on the best approach to pricing over the next few years, through the annual CRIS review cycle, incorporating reforms and further cost reductions as they are identified.</p>

# Appendix C: Additional fees and charges that may apply

## Organics – application and audit

The prices for application for and audit of organic certifying entity are as indicated in Table C1

**Table C1 Organics fees and charge**

Type of charge	Cost recovery charges	Unit	Price (\$) 2021–22	Price (\$) 2022–23	Price (\$) 2023–24	Price (\$) 2024–25
Charge	Application charge for organic goods certification operations	Per application	640	662	675	689
Fees	Assessment of applications or approvals	Per quarter hr	35	37	38	39
	Audit fee for organic good certification operations	Per quarter hr	35	37	38	39

## Tariff rate quota certificates

The prices for TRQ certificates for goods other than prescribed meat, prescribed meat products, prescribed milk and prescribed milk products are as indicated in Table C2.

**Table C2 TRQ certificate fees and charge**

Type of charge	Cost recovery charges	Unit	Price (\$) 2020–21	Price (\$) 2022–23	Price (\$) 2023–24	Price (\$) 2024–25
Charge	TRQ Certificate	Per document	40	44	45	46
Fee	TRQ Certificate electronic	Per document	15	17	17	17
	TRQ Certificate, manual	Per document	36	40	41	41
	Replacement TRQ Certificate	Per document	500	552	563	574

## Outside ordinary hours (OOH)

The additional fees payable for fee-bearing activity for certain goods by Commonwealth authorised officers outside ordinary hours of duty are as indicated in Table C3.

**Table C3 Outside ordinary hours fees for goods other than prescribed livestock, prescribed live animals, prescribed reproductive material and prescribed meat and prescribed meat products**

Type of charge	Time of service	Unit	Price (\$) 2021–22	Price (\$) 2022–23	Price (\$) 2023–24	Price (\$) 2024–25
Fee – OOH	On a weekday, immediately before or after a fee bearing activity	Per quarter hour	15	15	15	15
	On a weekday, in any other case	Any period up to 30 minutes	30	30	30	30

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Type of charge	Time of service	Unit	Price (\$) 2021–22	Price (\$) 2022–23	Price (\$) 2023–24	Price (\$) 2024–25
		Per quarter hour after first 30 minutes	15	15	15	15
	Saturday, Sunday or a departmental holiday	Any period up to 30 minutes	40	40	40	40
		Per quarter hour after first 30 minutes	20	20	20	20