



Australian Government
**Department of Agriculture,
Fisheries and Forestry**

Cost recovery implementation statement: fish and egg exports 2026–27



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Cataloguing data

This publication (and any material sourced from it) should be attributed as: DAFF 2026, *Cost recovery implementation statement: fish and egg exports 2026–27*, Department of Agriculture, Fisheries and Forestry, Canberra, June. CC BY 4.0.

This publication is available at agriculture.gov.au/about/fees/cost-recovery

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Acknowledgement of Country

We acknowledge the continuous connection of First Nations Traditional Owners and Custodians to the lands, seas and waters of Australia. We recognise their care for and cultivation of Country. We pay respect to Elders past and present, and recognise their knowledge and contribution to the productivity, innovation and sustainability of Australia's agriculture, fisheries and forestry industries.

Contents

Summary	1
Introduction.....	3
Purpose.....	3
About the department.....	3
Australian Government Charging Framework.....	3
Description of the regulatory activity.....	4
Payers of regulatory fees and charges	5
Government policy approval to cost recover.....	5
Statutory authority to apply fees and charges	7
1 CRIS updates.....	8
1.1 Phased return to full cost recovery	8
1.2 Transition of regulatory activities into cost recovery.....	9
1.3 Regulatory prices 2026–27 to 2029–30.....	13
2 Risk assessment	17
2.1 Charging Risk Assessment	17
2.2 Revenue variability	17
2.3 Accumulated results	18
3 Stakeholder consultation.....	19
3.1 Principles	19
3.2 Methodology	19
4 Cost recovery model for fish and egg exports.....	21
4.1 Cost base assumptions	21
4.2 Modelled cost base.....	21
5 Design of regulatory charges	24
5.1 Fish and egg export fees and charges	24
6 Financial estimates.....	26
6.1 Financial estimates	26
7 Financial and non-financial performance	28
7.1 Financial performance.....	28
7.2 Summary financial performance 2024–25	28
7.3 Non-financial performance.....	28
8 Review process	32
9 CRIS approval and change register	34
Appendix A: Cost recovery model	35

Regulatory charging activity outputs and business processes	35
Costs of regulatory charging activity	36
Description of cost model activities	38
Appendix B: Summary of stakeholder feedback.....	42

Tables

Table 1 Government decisions impacting regulatory charging for agricultural export activities.....	6
Table 2 Reduction in government supplementation across dairy, fish and egg, meat, horticulture and grain and plant products exports cost recovery arrangements.....	9
Table 3 Schedule for phasing additional regulatory activities into cost recovery arrangement	9
Table 4 Fees and levy-based charges for fish and egg exports regulatory activities, 2025–26 to 2029–30.....	13
Table 5 Cost base for fish and egg exports cost recovery arrangement, 2026–27	23
Table 6 Cost type breakdown for fish and egg exports cost recovery arrangement, 2026–27	23
Table 7 Fees, charges and volumes for fish and egg exports cost recovery arrangement, 2026–27 ...	24
Table 8 Financial estimates for fish and egg exports cost recovery arrangement, 2025–26 to 2029–30	26
Table 9 Financial performance for fish and egg exports cost recovery arrangement, 2021–22 to 2024–25.....	28
Table 10 Summary of financial position for fish and egg exports cost recovery arrangement, 2024–25	28
Table 11 CRIS approval and change register	34
Table B1 Stakeholder feedback for the 2026–27 CRIS.....	42

Figures

Figure 1 Example intervention activity process for regulated entities	22
Figure 2 Annual CRIS review process	33
Figure A1 Regulatory charging activity outputs and business processes.....	35
Figure A2 Category of activities.....	38

Summary

The Department of Agriculture, Fisheries and Forestry performs a range of regulatory activities in support of businesses and individuals who export agricultural products to global markets. Where demand for a government activity is created by identifiable individuals or groups, the Australian Government Charging Framework (Charging Framework) provides that the non-government sector may be charged for some or all of the efficient costs of that activity. We therefore impose fees and levy-based charges on the fish and egg export industries to recover the cost to the department for performing our regulatory activities. We refer to the framework of fees and charges as the fish and egg exports cost recovery arrangement. This cost recovery implementation statement (CRIS) provides information on how we propose to implement cost recovery for the arrangement.

Australia's trading environment is changing faster than ever, and the requirements for exporting agricultural products to overseas markets are becoming more complex. This has increased the costs of providing export regulatory services and means that our previous cost model no longer generates the revenue to match expenses incurred in delivering those export regulatory services.

To address the revenue gap, the government committed \$142.1 million to sustain the delivery of export regulatory services until 30 June 2026. The measure included funding to develop an ongoing sustainable trade funding model to ensure we are appropriately resourced to carry out trade and export activities into the future.

In the 2025–26 Mid-Year Economic and Fiscal Outlook (MYEFO), the government announced plans to return to full cost recovery and provided \$48.7 million in supplementation over 3 years to support a phased transition to full cost recovery. This announcement included adding 5 existing and one new activity, deemed consistent with the Charging Framework, into the exports cost recovery arrangements.

On 31 March 2026, in recognition of the disruptions being experienced by farmers and producers due to the conflict in the Middle East, the government announced a further decision to defer revised cost recovery arrangements for export regulatory services until 1 July 2027 by providing additional \$8.2 million in 2026–27. The objective remains to return to full cost recovery by 2029–30.

This CRIS provides information on how the department implements cost recovery charging for the fish and egg exports arrangement. It provides details of the fees and levy-based charges applying in 2026–27, noting that these are unchanged from 2025–26. This CRIS also presents a forecast of activity for each of the cost recoverable services covered by the fish and egg exports arrangement.

We also provide an overview of the proposed changes intended to come into effect from 1 July 2027 and in the following 2 financial years. While not a part of the CRIS applying to the 2026–27 financial year, the future pricing provides visibility of modelled prices and how the fish and egg exports arrangement is expected to return to full cost recovery. Included in this is the implementation of charging for activities that have previously been funded through appropriation.

Expenses for the fish and egg exports arrangement are forecast to increase by \$1.45 million or 26.9% over the next 4 years. Revenue is forecast to increase by \$3.00 million or 77.6% over the same period. These forecasts are underpinned by assumptions including a 3% annual increase in employee

cost and a 2.7% annual increase in supplier cost. To establish prices and expected revenue, we modelled stable export volumes and activities to 30 June 2030.

Stakeholders were consulted on the prices and the underlying assumptions such as the estimates of activity in [section 5](#). A summary of stakeholder feedback and how key issues have been considered is included at [Appendix B](#).

Introduction

Purpose

This cost recovery implementation statement (CRIS) provides information on how the Department of Agriculture, Fisheries and Forestry implements cost recovery charging for fish and egg exports cost recovery arrangement. It reports actual financial and non-financial performance information for the fish and egg exports cost recovery arrangement and contains financial and demand forecasts for 2026–27 to 2029–30. This CRIS also describes the proposed fees and levy-based charges for 2026–27 to 2029–30 and how supplementation provided by the government through the 2025–26 Mid-Year Economic and Fiscal Outlook (MYEFO) measure will be used to support the phased transition to full cost recovery.

About the department

Our department is the lead government agency for the agricultural sector (agriculture, fisheries and forestry) in Australia.

Our purpose is to work together to safeguard and grow sustainable agriculture, fisheries and forestry for all Australians. To achieve our purpose, we focus on 3 strategic objectives:

- **Sector growth** – support Australia’s agricultural sector, including the food and fibre industries, to be increasingly prosperous and internationally competitive in an ever-changing world.
- **Sector resilience and sustainability** – increase the contribution agriculture, fisheries and forestry make to a healthy, sustainable and low-emissions environment.
- **National biosecurity** – strengthen our national biosecurity system to provide a risk-based approach and an appropriate level of protection to Australia’s people, our environment and economy.

As a regulator, we enforce laws and administer export controls relating to agricultural products exported from Australia. This allows us to provide government-to-government assurances, instil greater confidence among Australia’s trading partners, thereby strengthening Australia’s position as a trusted source of premium agricultural products.

We continue to improve our regulatory practice in accordance with the principles of regulator best practice and improving regulator performance, capability and culture as required under the Department of Finance’s Resource Management Guide – Regulator Performance (RMG 128). Effective and efficient regulation enhances Australia’s economy, supports business and benefits the wider community.

Australian Government Charging Framework

The [Australian Government Charging Framework](#) applies across government. It ensures a consistent approach to policy development and helps determine when it is appropriate to charge for a government activity. The framework consists of:

- the Australian Government Charging Policy (Charging Policy)

- the Australian Government Cost Recovery Policy (Cost Recovery Policy).

The government's default policy position is that the full cost of an activity should be recovered from those creating the effort. The government decides as part of the policy approval for specific cost recovery whether it is full or partial cost recovery.

The Cost Recovery Policy supports consistent, transparent and accountable charging for government activities to ensure public resources are used properly. The Cost Recovery Policy describes how the Australian Government charges the non-government sector some or all of the efficient costs of specific government activities. In this context, efficiency means delivering government activities at the lowest possible cost while still achieving policy objectives and meeting legislative requirements.

Consistent with the Charging Framework, cost recovery for fish and egg exports activities is implemented through fees and levy-based charges. The type of charge is determined by the characteristics of the activities:

- **Fees** – charged when regulation is provided directly to an individual or organisation for the delivery of regulatory activities such as inspections of goods, audit of registered premises, or assessment of export certification.
- **Levy-based charges** – applied when regulation affects an entire industry sector rather than a specific individual or organisation. These charges recover the costs of maintaining regulatory infrastructure and integrity, including program management and administration, assurance and incident management activities.

Description of the regulatory activity

Fish and egg exports are regulated in accordance with the *Export Control Act 2020* (Export Control Act) and associated legislative framework.

The primary function of our fish and egg export program is to provide regulatory oversight of the seafood and egg export industries, and assurances to overseas government authorities through export certification. Export certification provides assurance that seafood and egg products have been manufactured, sourced and exported consistent with Australia's export legislation and in accordance with importing country requirements.

To certify a product's compliance with Australia's export requirements and the importing country requirements, we undertake 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, verifying, and enforcement activities to ensure that the production, storage, handling and transportation of fish and egg products intended for export comply with the conditions of Australian export controls and any additional requirements imposed by an importing country

- issuing permits, export certification and other documentation necessary to confirm compliance with the Australian export controls and any additional importing country requirements
- managing quota allocation and quota certification to enable exporters to access tariff rate concessions offered under trade agreements
- providing support through our overseas counsellors including assistance with detained consignments, government certification and other issues which result in goods being held at the border
- managing the National Residue Survey (NRS) which supports Australia’s primary producers and agricultural industries by confirming Australia’s status as a producer of clean food and facilitating access to export markets
- enforcing regulation of certified organic goods exported from Australia.

The full range of activities are described in [Description of cost model activities](#) using the categories in our cost model activity framework ([Appendix A](#)).

The Department of Finance was consulted in the assessment of these activities against the Charging Framework and confirmed that inclusion of activities described in the CRIS is consistent with the framework.

Payers of regulatory fees and charges

This CRIS outlines the regulatory charges that we cost recover from participants in the fish and egg exports supply chain, including exporters, producers, manufacturers and operators of vessels and storage facilities. For details of the fees and levy-based charges and prices for 2026–27 to 2029–30, see [CRIS updates](#). The government will continue to provide supplementation funding for a portion of the regulatory activities within the arrangement from 2026–27 to 2028–29, with the objective to return to full cost recovery by 2029–30.

Government policy approval to cost recover

Under the Charging Framework, cost recovery for export regulatory services requires policy approval and legislative authority. This section provides information on government approval of regulatory charging for export regulatory activities and the legislation that enables us to collect fees and levy-based charges.

Regulatory charging is appropriate because exports regulatory activities are provided to a clearly identifiable individual, organisation, or group participating in the agriculture, food and fibre export supply chain. If it were not for the business activities of these entities, the regulatory activities would not be required.

For these reasons, the government has determined regulatory charging to be the most appropriate mechanism for funding exports regulatory activities. Regulatory charging of export regulatory activities is consistent with the Charging Framework. This has been reaffirmed in various measures, including in the 2025–26 MYEFO when the government announced the *Securing the future of agricultural trade* measure.

Table 1 describes key government approvals for continued and expanded regulatory charging for agricultural exports since 2015.

Table 1 Government decisions impacting regulatory charging for agricultural export activities

Date	Government decision	Details
2026–27	Securing the future of agricultural trade	In March 2026, in recognition of the disruptions being experienced by farmers and producers due to the conflict in the Middle East, a further decision of government deferred the revised cost recovery arrangement for export regulatory services until 1 July 2027 by providing additional \$8.2 million in 2026–27. The timeline for achieving full cost recovery of these export regulatory services was confirmed to remain 1 July 2029.
2025–26	Securing the future of agricultural trade	In the 2025–26 MYEFO, the government committed to providing \$147.5 million over 4 years from 2025–26 (and \$32.7 million per year ongoing) for the department to sustain agricultural export regulatory and trade functions. This included \$65.8 million over 3 years from 2026–27 (and \$25.2 million per year ongoing) to continue export regulatory services while we commence a phased transition to full cost recovery over 3 years from 2026–27 for most agricultural exports cost recovery arrangements. The measure also includes the introduction of cost recovery for 5 existing export regulatory services and an ongoing regulatory efficiency program.
2024–25	Enabling agricultural exports into the future	The government invested an additional \$46.6 million as part of the 2024–25 MYEFO to continue to sustain the delivery of the department’s export regulatory services through 2025–26. This funding supported significant lead time for consultation and engagement on the design and implementation of a fit for purpose sustainable funding model.
2023–24	Securing the future of agricultural trade	In the 2023–24 MYEFO, the government committed \$91.8 million over 2 years to ensure Australia’s regulatory export and trade system remains able to meet the needs of both our exporters and the expectations of our trading partners, while supporting industry to achieve its goals now and into the future. \$3.7 million over 3 years was also provided for the development of an ongoing sustainable funding model to support our export regulatory and trade activities.
2020–21	Busting congestion for agricultural exporters	Policy authority for export regulatory charging was reaffirmed in the 2020–21 Budget when the then government announced the Busting Congestion for Agricultural Exporters package. The package consisted of reforms for the Australian agricultural sector as part of the Economic Recovery Plan to rebuild the economy and recover from the COVID-19 recession. This included \$71.1 million to improve the financial sustainability of export certification services, supporting a stepped return to full cost recovery, and enabling reforms to be rolled out while maintaining existing systems.
2020	Introduction of the <i>Export Control Act 2020</i>	The <i>Export Control Act 2020</i> and related rules and charging regulations for exported commodities, set out the overarching legislative framework for the regulation of exported goods, including food and agricultural products, from Australian territory. A fundamental aspect of this framework is the recovery of costs from exporters for regulatory activities carried out by the department.
2018–19	Expanded cost recovery	In the May 2018 Budget, the government confirmed continuing cost recovery from industry through the Expanded Cost Recovery measure, which commenced on 1 July 2019, and included: <ul style="list-style-type: none"> enforcement activities to support compliance with Australian regulation and international import conditions. Activities that will be cost recovered include investigations and engagement with clients about compliance but does not include the costs of infringement notice schemes or undertaking litigation. provision of scientific and technical advice to improve or maintain existing export markets. Examples include the provision of scientific or technical advice to re-open or maintain market access following a pest or disease

Cost recovery implementation statement: fish and egg exports 2026–27

Date	Government decision	Details
		<p>incursion or change in import conditions; and improving existing market access by seeking to reduce import requirements or simplify certification processes.</p> <ul style="list-style-type: none"> services provided by overseas counsellors relating to detained consignments, government certification and other issues which result in goods being held at the border.
2015	Department of Agriculture and Water Resources – Comprehensive review of cost recovery	Over the period 2014–15, we redesigned our cost recovery arrangements as part of a funding strategy for our biosecurity and export certification activities. The review sought to streamline existing frameworks to address inequities, ensure all costs are recovered and reduce the complexity of our fees and levy-based charges. Outcomes of the review were implemented 1 December 2015.

Statutory authority to apply fees and charges

Section 399 of the Export Control Act provides that 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 Export Control Act. The specific fees and price points are set out in the [Export Control \(Fees and Payments\) Rules 2021](#).

Cost recovery charges are imposed under the:

- *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 the:

- [Export Charges \(Imposition—General\) Regulations 2021](#)
- [Export Charges \(Imposition—Customs\) Regulations 2021](#)

It is intended that legislative instruments will be updated to reflect new prices for the cost recovery arrangement from 1 July 2026.

1 CRIS updates

Since the regulatory prices were last set in 2020–21, the rate of change in Australia’s export trade landscape has accelerated. The complexity of market access requirements (the requirements we must meet to get agricultural products into overseas markets) has grown, patterns of demand for Australian agricultural exports have changed, and inflation has continued to increase the costs of delivering services. These changes meant that our previous cost model no longer reflected the real cost of delivering export services. By 2023–24, a revenue gap emerged that required government supplementation to maintain essential trade and export services needed to support agricultural sector exports.

To address the revenue gap, the government committed \$142.1 million to sustain the delivery of export regulatory services until 30 June 2026 (see Table 1). As part of the 2023–24 Budget measure, we received government authority to develop an ongoing sustainable funding model to support our export regulatory and trade activities. We have reviewed export fees and levy-based charges in detail, including consideration of future costs, expected volumes of regulatory activity and limited structural or pricing reforms.

In MYEFO 2025–26, the government announced an additional \$48.7 million in supplementation funding to support a phased return to full cost recovery over the next 3 years (2026–27 to 2028–29) for all exports arrangements. The decision also allowed for cost recover 5 existing regulatory activities and a new regulatory efficiency program that fall within the scope of the Charging Framework. These include regulatory activities in maintenance of market access.

On 31 March 2026, in recognition of the disruptions being experienced by farmers and producers due to the conflict in the Middle East, the government announced a further decision to defer revised cost recovery arrangements for export regulatory services until 1 July 2027 by providing additional \$8.2 million in 2026–27. The objective remains to return to full cost recovery by 2029–30. Therefore, the prices presented in this CRIS for 2026–27 are unchanged from 2025–26.

1.1 Phased return to full cost recovery

The MYEFO 2025–26 announcement provided a phased reduction in government supplementation across the exports cost recovery arrangements. The supplementation will cease at the end of 2028–29 when the exports cost recovery arrangements are modelled to return to full cost recovery. An updated decision to provide additional government supplementation in 2026–27 means that prices will be unchanged in 2026–27.

The supplementation means that the meat, dairy, fish and egg, horticulture, and grain and plant products exports arrangements will return to full cost recovery by 2029–30 with stepped increases in pricing after 2026–27.

Table 2 shows the supplementation provided by the government as a proportion of the cost recovery revenue gap that existed as of the 2025–26 budget. Supplementation will be provided in full in 2026–27 and reduce from 1 July 2027. The phasing schedule aims to reduce potential impact on export businesses from sudden increases in regulatory prices and to provide time to adapt. It also considers the current supply chain uncertainties due to conflict in the Middle East.

Consequently, the indicative prices over the phasing years provided in Table 4 reflect the reductions in government supplementation provided as the arrangements return to full cost recovery.

Table 2 Reduction in government supplementation across dairy, fish and egg, meat, horticulture and grain and plant products exports cost recovery arrangements

Financial year	Proportion of 2025–26 revenue gap funded by government supplementation ^a (%)
2026–27	100
2027–28	50
2028–29	25
2029–30	0

^a Revenue gap in the context of 2025–26 budget

1.2 Transition of regulatory activities into cost recovery

We have completed a review of the activities that we undertake to deliver our agricultural trade and export regulatory and non-regulatory services. Through this review, we identified 4 existing regulatory activities relevant to the fish and egg exports arrangement that have been funded through government appropriation and that are within the scope of current policy authority for export cost recovery and the Charging Framework. To ensure ongoing sustainability of essential regulatory services, we will transition the funding mechanism of the identified activities in [Section 1.2](#) into cost recovery. This will occur in a phased manner over 3 years in the schedule specified in Table 3.

Table 3 Schedule for phasing additional regulatory activities into cost recovery arrangement

Financial year	Proportion of cost funded through cost recovery (%)	Proportion of cost funded through appropriation (%)
2026–27	0	100
2027–28	50	50
2028–29	75	25
2029–30	100	0

Relevant to the fish and egg arrangement, the regulatory activities to be transitioned into cost recovery are:

- [Manual of Importing Country Requirements sustainment](#)
- [Fit-and-proper-person assessment](#)
- [Market maintenance](#)
- [Non-compliance investigation and triage](#)

In addition, we will introduce a new and ongoing [regulatory efficiency program](#) into the cost recovery arrangement. Regulatory efficiency programs (such as the Dairy Export Assurance Program) are necessary to improve regulatory efficiencies and reduce the cost of exports arrangements that

benefit the sector. The program is therefore deemed appropriate for cost recovery in accordance with the Charging Framework. We will work with industry on program design and governance prior to phasing this work into cost recovery from the 2027–28 financial year.

The costs associated with each of the activities detailed below are included in the proposed fees and levy-based charges presented in Table 4 from 2027–28.

Manual of Importing Country Requirements sustainment

The Manual of Importing Country Requirements (Micor) is a departmental system capturing known trading partner requirements that exporters and the department must meet so that agricultural products exported will be accepted by overseas countries. This system requires ongoing maintenance and user support services.

The maintenance and existence of Micor is critical for ensuring that Australian exports meet the requirements of both the Export Control Act and importing country regulations. The service directly supports industry participants to understand importing country requirements and their obligations. The digital platform is like other digital and web-based information management resource services that exist for the agricultural export industry. Because this service supports efficient decision-making and improves compliance with importing country requirements and the Export Control Act, cost recovering this work is consistent with the Charging Framework and the export CRIS structure.

The forecast cost for sustainment of the Micor system is \$1.16 million in 2029–30 which supports all 7 of the department's exports arrangements. We have attributed \$0.11 million to the fish and egg exports arrangement based on an assessment of the effort required for the department to manage information, including infrastructure, security, content updates, licences and usage volume related to the export of prescribed fish and prescribed fish products and prescribed egg and prescribed egg products. There will be no increase to cost recovery within the fish and egg exports arrangement in 2026–27 to fund this work. In 2027–28, \$52,533 will be included in cost recovery, increasing to \$80,909 in 2028–29 and \$110,881 in 2029–30.

As Micor benefits and is used by establishments and exporters, the costs have been equally apportioned to the fish and egg establishments pricing pool and the fish and egg exporters pricing pool. The establishments pricing pool drives costs to the application and annual registration charges for fish and egg establishments. The exporters pricing pool drives costs to documentation charges associated with export activity.

Fit and proper person assessment

We undertake fit-and-proper-person (FPP) assessments to determine the integrity of certain Australian export supply chain participants. The assessments inform decision-makers when considering different permissions under the Export Control Act, including establishment registrations, export licences, approved arrangements and when approving individual persons such as authorised officers and when details are updated (such as new persons in management or control).

This activity relates to our direct intervention services in administering the Export Control Act. Similar activities such as technical assessments undertaken to assess an application under the Export Control

Act are currently funded through cost recovery. Cost recovering this work is consistent with the Charging Framework and the export CRIS structure.

The forecast cost for FPP assessments across all exports arrangements is \$1.38 million in 2029–30. We have attributed \$0.09 million to the fish and egg exports arrangement based on an assessment of the effort required in conducting FPP assessments for participants involved in the export of prescribed fish and prescribed fish products and prescribed egg and prescribed egg products. There will be no increase to cost recovery within the fish and egg exports arrangement in 2026–27 to fund this work. In 2027–28, \$52,542 will be included in cost recovery, increasing to \$72,395 in 2028–29 and \$93,257 in 2029–30.

The costs associated with this work have been apportioned 80% to the assessment price pool, 14% to the fish and egg exporter levy pricing pool, and 6% to the fish and egg establishment pricing pool. The assessment pricing pool includes the consideration and assessment of information submitted to, requested, or collected by us when considering an application made under the Export Control Act and the costs of issuing documentation. The establishments pricing pool drives costs to the application and annual registration charges for fish and egg establishments. The exporters pricing pool drives costs to documentation charges associated with export activity.

Market maintenance

Our market maintenance work helps exporters and industry clarify and meet importing country requirements and facilitates exports and certification. This work enables the release of detained or distressed consignments, supports and coordinates trading partner system and listing audits, and addresses trade suspensions resulting from increasingly complex or changed importing country requirements. In the last 5 years, market maintenance activities have expanded due to increasing complexity in trading partner requirements and additional audits that we have needed to facilitate to keep markets open.

This activity falls within the scope of current policy authority for cost recovery following decisions of government in the 2018–19 Budget. Some of the costs are not currently included within the expense base for the fish and egg exports arrangement but will now be transitioned into cost recovery.

The forecast cost for the market maintenance activities that are not currently being cost recovered is \$0.82 million in 2029–30 within the meat, dairy, fish and egg, and non-prescribed goods arrangements. We have attributed \$0.13 million to the fish and egg exports arrangement based on an assessment of the effort performed by the department in supporting market access across the export supply chain in meeting importing country requirements, including the implementation of systems and regulations, provision of assurance, facilitation of trading partner audits, and resolution of trade suspensions. There will be no increase to cost recovery within the fish and egg exports arrangement in 2026–27 to fund this work. In 2027–28, \$108,501 will be included in cost recovery, increasing to \$118,981 in 2028–29 and \$130,010 in 2029–30.

We have assigned 65% of these costs to the exporters pricing pool with the remainder to the establishment pricing pool. The exporters pricing pool drives costs to documentation charges associated with export activity. The establishments pricing pool drives costs to the application and annual registration charges for fish and egg establishments.

Non-compliance investigation and triage

Under the Export Control Act, we administer direct intervention activities that include investigation and triage related to reported non-compliances with the Act. Our Compliance and Enforcement Division oversees non-compliances and non-compliance trends. They triage and prioritise responses to non-compliances and associated reporting.

Included in the cost recoverable activities are investigations and engagement with clients about compliance and associated case triage. Policy authority for cost recovery of these activities was included in the decision of government in the 2018–19 Budget. Activities to issue fines and penalties or those associated with prosecutions are not cost recoverable under the Charging Framework and are therefore not included.

The forecast cost associated with the work is \$0.78 million in 2029–30 across all 7 exports arrangements. We have attributed \$0.13 million to the fish and egg exports arrangement based on an assessment of the effort performed by the department in undertaking these activities related to preparing and exporting prescribed fish and prescribed fish products and prescribed egg and prescribed egg products. There will be no increase to cost recovery in 2026–27 to fund this work. In 2027–28, \$75,410 will be included in cost recovery, increasing to \$102,681 in 2028–29 and \$131,422 in 2029–30.

These costs have been allocated only to the fish and egg establishments pricing pool which drives costs to the application and annual registration charges for fish and egg establishments.

Regulatory efficiency program

This program represents an activity that would be new to cost recovery arrangements. The program is aimed at ensuring the regulatory system is contemporary, efficient and effective. Historically, we undertook short-term and ad-hoc activities to implement improvements to regulatory systems through specifically provided funding. Ongoing capability and capacity do not exist under the current funding arrangements, and this is intended to provide ongoing support to drive regulatory efficiency, in partnership with the sector.

The scope of activities under this function could include:

- developing approaches that use data and analytics to support a risk-based, digitally enabled regulatory system that simplifies compliance for exporters, focuses regulatory effort on higher risk activities, and could support reductions in compliance requirements such as audit frequency recognising industry processes and alternative verification technologies that achieve equivalent regulatory outcomes and reduce regulatory burdens on businesses
- simplifying regulatory systems, making them easier for businesses to navigate
- streamlining processes for regulated entities and the department in delivering export services to businesses, and corporate functions related to cost recovery
- automating more processes, including export certifications.

The increasing complexity in the export regulatory system and the requirements of trading partners heighten the need to maintain a strong and responsive export regulatory system to support exporters. For example, our previous work within the Dairy Export Assurance Program helped raise

exporter awareness and streamlined audit arrangement through a risk-based approach. This has resulted in reduced audit frequency and cost for industry while also ensuring regulation was effective in meeting export requirements. Without stable and sustainable investment, it would not be possible to keep pace with the growing demand for this activity.

The decision of government in the 2025–26 Budget provided policy authority to include \$2.49 million into cost recovery across the dairy, fish and egg, meat, horticulture and grain and plant products exports arrangements. Cost recovery would commence in 2027–28 with 50% of the final planned revenue, increasing to 75% in 2028–29 and 100% from 2029–30.

We have split this across those 5 exports arrangements and will phase in these new costs over 3 years. This will result in \$234,544 being included in cost recovery for the fish and egg exports arrangement in 2027–28, increasing to \$389,540 in 2028–29 and \$498,022 in 2029–30. These costs would be allocated only to the fish and egg exporters pricing pool.

Throughout 2026–27, we will work closely with industry consultative committees to design the structure, scope and priorities of the program for the fish and egg exports arrangement, including the principles that will guide investment. This collaborative design process will ensure the program delivers benefits for government and industry, while maintaining the integrity and effectiveness of the regulatory system.

1.3 Regulatory prices 2026–27 to 2029–30

Table 4 shows the regulatory prices from 2026–27 to 2029–30, taking into consideration the proposed pathway for sustainable funding of export regulatory services described in [section 1.1](#) and [section 1.2](#).

Starting from 1 July 2030, prices would be adjusted utilising an indexation mechanism based on the wage price index (WPI). Alongside these adjustments, annual cost base reviews will take place to monitor performance of the arrangement and to inform any future actions, including any adjustments to regulatory pricing. Importantly, the prices for 2027–28 to 2029–30 reflect current modelling of costs and export activity. Changes to the costs, underlying assumptions about inflation, or export activity may warrant future prices to be revisited. Changes to prices would require legislative amendments which may impact how quickly any revised price modelling can be completed and implemented.

Table 4 Fees and levy-based charges for fish and egg exports regulatory activities, 2025–26 to 2029–30

Type of charge	Cost recovery charges	Unit	Current 2025–26 (\$)	Proposed 2026–27 (\$)	Proposed 2027–28 (\$)	Proposed 2028–29 (\$)	Proposed 2029–30 (\$)
Levy-based charge	Storage establishment – fish	Annual	2,106	2,106	3,124.29	3,699.97	4,004.50
	Storage establishment – fish – part year	Annual	1,053	1,053	1,562.14	1,849.98	2,002.25
	Vessel (preparation direct export)	Annual	2,807	2,807	4,164.24	4,931.53	5,337.43

Cost recovery implementation statement: fish and egg exports 2026–27

Type of charge	Cost recovery charges	Unit	Current 2025–26 (\$)	Proposed 2026–27 (\$)	Proposed 2027–28 (\$)	Proposed 2028–29 (\$)	Proposed 2029–30 (\$)
	Vessel (preparation direct export) – part year	Annual	1,403.50	1,403.50	2,082.12	2,465.77	2,668.72
	Land establishment – live only	Annual	1,404	1,404	2,082.86	2,466.64	2,669.67
	Land establishment – live only – part year	Annual	702	702	1,041.43	1,233.32	1,334.83
	Land establishment – processing	Annual	2,807	2,807	4,164.24	4,931.53	5,337.43
	Land establishment – processing – part year	Annual	1,403.50	1,403.50	2,082.12	2,465.77	2,668.72
	Egg establishment	Annual	2,106	2,106	3,124.29	3,699.97	4,004.50
	Egg establishment – part year	Annual	1,053	1,053	1,562.14	1,849.98	2,002.25
	Registration application – fish	Per application	689	689	1,022.14	1,210.48	1,310.11
	Registration application – egg	Per application	689	689	2,044.28	2,420.96	2,620.21
Fee	Audit – fish or egg	Per quarter hour	57	57	75.91	88.44	94.09
	Assessment – fish or egg	Per quarter hour	57	57	75.91	88.44	94.09
	Export document – manually-issued – fish	Per document	115	115	182.81	248.33	288.31
	Export document – manually-issued – egg	Per document	115	115	182.81	248.33	288.31
	Export document – manually-issued permit	Per document	115	115	182.81	248.33	288.31
	Replacement export document – fish	Per document	574	574	890.19	1,209.26	1,403.94
	Replacement export document – egg	Per document	574	574	890.19	1,209.26	1,403.94
	Application for exemption – fish	Per quarter hour	57	57	75.91	88.44	94.09
Fee/levy-based charge	Export document – electronically-issued – fish (including fee and levy-based charge) ^a	Per document	38	38	42.33	50.88	55.91
	– Levy-based charge		31	31	31.20	35.76	38.36
	– Fee		7	7	11.13	15.12	17.55
	Export document – electronically-issued	Per document	38	38	42.33	50.88	55.91

Cost recovery implementation statement: fish and egg exports 2026–27

Type of charge	Cost recovery charges	Unit	Current 2025–26 (\$)	Proposed 2026–27 (\$)	Proposed 2027–28 (\$)	Proposed 2028–29 (\$)	Proposed 2029–30 (\$)
	– egg (including fee and levy-based charge) ^a						
	– Levy-based charge		31	31	31.20	35.76	38.36
	– Fee		7	7	11.13	15.12	17.55
	Export document – electronically-issued permit – fish (including fee and levy-based charge) ^a	Per document	38	38	42.33	50.88	55.91
	– Levy-based charge		31	31	31.20	35.76	38.36
	– Fee		7	7	11.13	15.12	17.55
	Export document – electronically-issued permit – egg (including fee and levy-based charge) ^a	Per document	38	38	42.33	50.88	55.91
	– Levy-based charge		31	31	31.20	35.76	38.36
	– Fee		7	7	11.13	15.12	17.55
Outside ordinary hours (OOH) fee	Weekday continuous	Per quarter hour	15	15	23.50	24.16	24.84
	Weekday non-continuous (up to 30 minutes)	Any period up to 30 minutes	30	30	47.00	48.32	49.68
	Weekday non-continuous (after 30 minutes)	Per quarter hour	15	15	23.50	24.16	24.84
	Weekend and public holiday non-continuous (up to 30 minute)	Any period up to 30 minutes	40	40	62.67	64.43	66.24
	Weekend and public holiday non-continuous (after 30 minutes)	Per quarter hour	20	20	31.33	32.22	33.12
Organics ^b	Organic certifying body	Annual	8,608	8,608	8,455.25	8,588.96	8,863.99
	Organic certifying body – part year	Annual	4,304	4,304	4,227.63	4,294.48	4,432.00
	Application charge for organic goods certification operation	Per application	689	689	384.32	390.39	402.90
	Audit fee for organic good certification operations	Per quarter hour	39	39	49.96	50.75	52.38

Cost recovery implementation statement: fish and egg exports 2026–27

Type of charge	Cost recovery charges	Unit	Current 2025–26 (\$)	Proposed 2026–27 (\$)	Proposed 2027–28 (\$)	Proposed 2028–29 (\$)	Proposed 2029–30 (\$)
	Assessment of applications or approvals	Per quarter hour	39	39	49.88	50.68	52.31

Note: Modelled prices have been rounded to the nearest cent. **a** Export documentation attracts both a fee and a levy-based charge and this CRIS shows the total price followed by each component separately. **b** Organic certifiers support a small number of exporters in each of the exports arrangements (excluding live animal exports) and therefore the prices have been reflected in each CRIS.

2 Risk assessment

2.1 Charging Risk Assessment

In accordance with the [Australian Government Charging Policy](#), we have undertaken a Charging Risk Assessment (CRA), involving the ongoing assessment and management of risk at each phase of the cost recovery process. The CRA applies to the 2026–27 financial year and for the fish and egg exports cost recovery arrangement the implementation risk has been rated as medium, which is based on an assessment of each component, including:

- a low-risk rating for the expected percentage change in total annual revenue (less than 10% in 2026–27)
- a low-risk rating for the expected change in total value of annual revenue (less than \$10 million in 2026–27)
- a low-risk rating for the highest percentage increase in price a payer may experience (less than 5% in 2026–27)
- The assessment of the type of charges was considered not applicable as there will be no changes to fees or levies in 2026–27
- The assessment of changes to regulatory charges was considered not applicable as there is no change to the value or structure of regulatory charges in 2026–27
- a low-risk rating for legislative changes due to the level of change in legislative arrangements which only requires a change to subordinate legislation to specify the value of fees and charges
- a low-risk rating for the level of impact of cost recovery on payers as regulatory charges will not be changing in 2026–27
- a low-risk rating for the level of complexity in working with other government entities to deliver the regulatory functions
- a medium-risk rating for consultation as the CRIS was consulted with stakeholders and issues raised have been addressed for the 2026–27 CRIS.

2.2 Revenue variability

In line with the Charging Framework, complexity, materiality and sensitivity are considered in assessing and managing the risk associated with the cost recovery process. Variation in revenue from cost-recovered activities may arise due to complexity of the processes (activities) within arrangements and factors beyond our control. This includes changing demand for regulatory services where fluctuations will contribute to variability in the revenue stream. For example, demand for commodities, overseas economic factors and climatic events can all impact regulatory effort, costs and volumes of activities. Challenges of projecting revenue from fees and levy-based charges may translate into risk of further revenue gap over the forward years.

2.3 Accumulated results

Regulatory charging is set to recover reasonable costs. However, several factors including volume variances and changes in expenses based on risk profiles – can affect the difference between revenue and expenses. The differences that may be accumulated within an arrangement at the end of a financial year are referred to as accumulated results.

Accumulated results help keep revenue, expenses and forecast volumes aligned, and we have been recording these amounts since the start of the arrangement. We do not use any excess amounts we collect to subsidise shortfalls in other arrangements or our non-cost recovered functions.

Under-recoveries result from the arrangement not recovering the full costs of regulatory activities. This results in the arrangement operating at a loss and adversely impacts the accumulated result for the arrangement at the end of the year. Ongoing under-recovery will lead to the need for further review of the regulatory charging arrangement to ensure its return to sustainable recovery for all regulatory costs. This excludes any accumulated deficits, which are not factored into future price setting, consistent with the Cost Recovery Framework.

3 Stakeholder consultation

Stakeholder engagement plays an important role in the development and management of cost recovery arrangements. We acknowledge that our stakeholders have unique insights into how our regulatory activities impact their businesses and help us design efficient cost recovery frameworks for these activities. The purpose of our stakeholder engagement 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 us to plan, design, undertake and evaluate stakeholder engagement activities in a transparent and accountable way.

Our stakeholder engagement is designed to meet the requirements of the:

- [Australian Government Charging Framework](#)
- [Australian Government Guide to Regulation](#)
- [Australian Public Service Framework for Engagement and Participation](#).

3.1 Principles

Our principles for engagement are to listen, be genuine and be transparent. We will achieve this by:

- engaging with a diverse group of stakeholders to ensure a clear explanation of the objectives and context
- communicating what aspects are in scope and out of scope for consultation
- providing sufficient time for stakeholders to engage in consultation processes
- communicating challenges and outcomes
- explaining how stakeholder feedback has been considered.

3.2 Methodology

Throughout 2024 and 2025, the department held more than 98 engagement sessions across 12 different industry consultation groups, including providing policy position papers and conducting online public consultation. Sixteen of these sessions were for or included the fish and egg export industries.

From February to April 2024, we sought feedback from stakeholders across the export supply chain, including peak industry bodies, primary producers, packers and exporters through our Have Your Say platform. We also provided additional updates through the regular industry consultative meetings and industry briefings during 2024 and 2025. The government considered the feedback received when deciding on a future sustainable funding model for agricultural trade and export functions.

On 30 October 2025, we held an industry briefing to share information on the cost base analysis of our exports cost recovery arrangements. Preliminary feedback from industry indicated they would like to receive further details of the cost base. Industry engaged on our proposed options to achieve financial sustainability and sought assurance that productivity and efficiency are incorporated into

the pricing model. Some stakeholders expressed concern that the increasing prices of export regulatory services would contribute to elevated input costs and affect viability of export businesses.

On 12 December 2025, the government announced the decision to introduce a new cost recovery arrangement for export regulatory functions from 1 July 2026, including a phased return to cost recovery over the next 3 years for most export arrangements. We held an industry briefing on that day to provide industry with information about the decision and further background can be found in [Export cost recovery reform for sustainable trade funding](#).

We held a 7-week formal industry consultation process from 29 January 2026 to 20 March 2026. We invited stakeholders to provide comments on the impact of proposed changes to cost recovery arrangements. During the consultation period, the fish and egg export industries provided written submissions through our Have Your Say platform as well as feedback through an all-industry live webinar, face-to-face meetings (including in regional centres) and targeted industry meetings.

We have consulted with industry stakeholders on:

- the new proposed price structure for export regulatory services including tables comparing current and proposed fees and levy-based charges over the full phasing timeframe
- the rationale and explanation of the changes including the drivers of change to the cost base, and description of activities being transitioned from appropriation funded to cost recovery set out in consultation papers or fact sheets
- how proposed fees may impact businesses.

We have addressed comments received as part of the consultation process for the finalisation of this CRIS. A summary of our responses is included in [Appendix B](#).

4 Cost recovery model for fish and egg exports

This section describes the fish and egg exports cost recovery model and additional financial information associated with audit, inspection and certification activities for fish and egg exports.

4.1 Cost base assumptions

The 2025–26 budget was used as the starting point for determining the cost base applied in this CRIS. The cost base was modelled to reflect the full cost of delivering regulatory services to support the fish and egg export industries. We have identified that the key cost driver for permit and assessment-based activities is complexity, which determines the amount of time and effort spent on a regulatory output. We also note that employee-related costs are the largest part of our regulatory activity cost. External suppliers and operating support for our export IT systems are the other major direct costs.

Compared to the previous financial model developed in 2020–21, new assumptions made in the current financial modelling were:

- 3% annual increase in employee related expenses in line with public sector wage settings in recent years
- 2.7% annual increase in supplier cost to account for inflation, which is within the anticipated range of headline inflation.

4.2 Modelled cost base

In preparing this CRIS, we reviewed the cost base for the fish and egg exports arrangement fees and levy-based charges, including consideration of future costs, the expected volume of regulatory activity, [Phased return to full cost recovery](#) and [Transition of regulatory activities into cost recovery](#). The cost bases used in our modelling to establish pricing are represented in Table 5, Figures in **Error! Not a valid bookmark self-reference.** are sourced from modelling based on the 2025–26 budget with updates as part of the mid-year budget process. This modelling has been used to establish the cost base and for determining future prices.

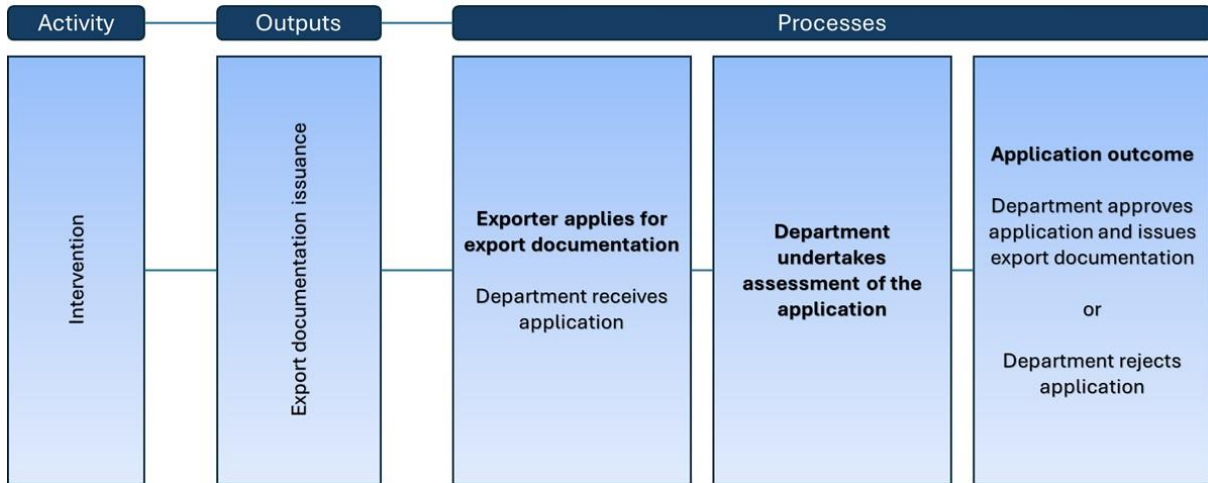
Table 6 and Table 7. We allocate employee, supplier, system and corporate costs to each type of regulatory activity (see [Appendix A](#)).

Direct costs

Direct costs are primarily the costs for employees who provide regulatory activities. In addition to the employee costs, it also includes supplier costs, such as direct capital expenses. Direct costs are allocated to the regulatory activity, which best reflects the activity undertaken.

Figure 1 provides an example of the connection between the activity of intervention and output of export documentation for an exported good.

Figure 1 Example intervention activity process for regulated entities



Indirect costs

Indirect costs are enabling costs, which cannot be attributed to a specific activity or output. These include information and communications technology, maintenance, office accommodation, and costs for finance and corporate services needed for regulatory staff to do their job. We include indirect expenses in the cost base to reflect the systems and processes which exist to support efficient administration and benefit the cost-recovered arrangements. Indirect costs are allocated to cost recovered and appropriated activities using cost drivers, such as headcount and full-time equivalents (FTE), in line with our cost allocation policy.

Capital costs

Capital costs included in the operating costs of business processes are depreciation of property, plant and equipment (including furniture, IT hardware and infrastructure), amortisation of IT systems and software, non-capital software development costs, and accommodation.

Table 5 shows the fish and egg exports arrangement cost base for 2026–27.

The cost base of \$5.6 million comprises:

- \$4.3 million in levy-based charge-related activities
- \$1.4 million in fee-related activities.

A description of cost activities and the methodology for attributing costs to these activities are provided in [Appendix A](#).

Table 5 Cost base for fish and egg exports cost recovery arrangement, 2026–27

Charge type	Activity	Expense (\$)	Cost recovery charges
Levy-based charge	<ul style="list-style-type: none"> • Program management and administration <ul style="list-style-type: none"> – Workforce and business administration – Business system administration – Stakeholder engagement – Policy and instructional material – Business improvement • Assurance <ul style="list-style-type: none"> – Risk management – Verification – Surveillance • Incident management <ul style="list-style-type: none"> – Incident management – Investigative support – Corrective action 	4,261,551	Annual registration, export documentation, throughput, application and management of approved arrangements
Fee-for-service	Intervention – assessment	760,098	Assessment
	Intervention – export documentation issuance	44,134	Documentation
	Intervention – audit	550,331	Audit
	Total cost base	5,616,114	–

Figures in **Error! Not a valid bookmark self-reference.** are sourced from modelling based on the 2025–26 budget with updates as part of the mid-year budget process. This modelling has been used to establish the cost base and for determining future prices.

Table 6 Cost type breakdown for fish and egg exports cost recovery arrangement, 2026–27

Category	Expense	Forecast (\$)
Direct	Employee	3,120,385
	Operating	931,076
	Other	236,982
	Subtotal	4,288,443
Indirect	Digital Services	414,595
	Finance and Investment	327,075
	Legal	70,450
	People, Property & Security	477,928
	Strategy Performance and Engagement	37,622
	Subtotal	1,327,670
Total	–	5,616,114

5 Design of regulatory charges

This CRIS includes a mix of fees and levy-based charges for regulatory activities. These charges are made under the [Export Control \(Fees and Payments\) Rules 2021](#), the [Export Charges \(Imposition—General\) Regulations 2021](#) and [Export Charges \(Imposition—Customs\) Regulations 2021](#).

Fees are charged when regulation is provided directly to an individual or organisation for delivery of regulatory activities, such as inspection of goods, audit of registered premises, or assessment of export certification (see [Direct intervention activities](#)).

Levy-based charges are applied 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 program management and administration, assurance, and incident management activities (see [Program management and administration activities](#)).

5.1 Fish and egg export fees and charges

Fees and levy-based charges are legislated in the Export Control (Fees and Payments) Rules 2021, the Export Charges (Imposition—General) Regulations 2021 and the Export Charges (Imposition—Customs) Regulations 2021.

The prices set between 2026–27 and 2029–30 are derived from financial modelling methodology described in [Cost recovery model for fish and egg exports](#). The prices, modelled revenue and volume for 2026–27 are shown in Table 7.

We have not included outside ordinary hour fees in this table as these volumes are not typically forecast.

Table 7 Fees, charges and volumes for fish and egg exports cost recovery arrangement, 2026–27

Type of charge	Cost recovery charges	Unit	Modelled revenue (\$)	Modelled volume (unit)	2026–27 price (\$)
Levy-based charge	Storage establishment – fish	Annual	301,158	143	2,106
	Storage establishment – fish – part year	Annual	4,212	4	1,053
	Vessel (preparation direct export)	Annual	283,507	101	2,807
	Land establishment – live only	Annual	62,797	44.7272	1,404
	Land establishment – live only – part year	Annual	2,106	3	702
	Land establishment – processing	Annual	450,909	161	2,807
	Land establishment – processing – part year	Annual	2,807	2	1,403.50
	Egg establishment	Annual	126,360	60	2,106

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Cost recovery implementation statement: fish and egg exports 2026–27

Type of charge	Cost recovery charges	Unit	Modelled revenue (\$)	Modelled volume (unit)	2026–27 price (\$)
	Registration application – fish	Per application	17,225	25	689
	Registration application – egg	Per application	689	1	689
Fee	Audit – fish or egg	Per quarter hour	376,941	6,613	57
	Export document – manually-issued – fish	Per document	1,150	10	115
	Export document – manually-issued – egg	Per document	690	6	115
	Export document – manually-issued permit	Per document	3,220	28	115
	Replacement export document – fish	Per document	72,324	126	574
	Replacement export document – egg	Per document	2,296	4	574
	Application for exemption – fish	Per quarter hour	228	4	57
Fee/levy-based charge	Export document – electronically-issued – fish (including fee and levy-based charge) ^a	Per document	1,187,766	31,257	38
	– Levy-based charge				31
	– Fee				7
	Export document – electronically-issued – egg (including fee and levy-based charge) ^a	Per document	9,082	239	38
	– Levy-based charge				31
	– Fee				7
	Export document – electronically-issued permit – fish (including fee and levy charge) ^a	Per document	1,279,156	33,662	38
	– Levy-based charge				31
	– Fee				7
	Export document – electronically-issued permit – egg (including fee and charge) ^a	Per document	9,120	240	38
	– Levy-based charge				31
	– Fee				7
	Total		4,193,743		

Note: ^a Export documentation attracts both a fee and a levy-based charge and this CRIS shows the total price followed by each component separately. Volumes and revenue for the separate components are not presented here.

6 Financial estimates

6.1 Financial estimates

The financial estimates of the fish and egg exports cost recovery arrangement are provided in Table 8.

Table 8 Financial estimates for fish and egg exports cost recovery arrangement, 2025–26 to 2029–30

Finance element	2025–26 (\$)	2026–27 (\$)	2027–28 (\$)	2028–29 (\$)	2029–30 (\$)
Revenue = X	3,860,269	4,193,743	5,251,974	6,280,767	6,855,608
Expenses = Y	5,402,269	5,616,114	5,915,889	6,499,854	6,855,608
Balance = X - Y	(1,542,000)	(1,422,371)	(663,915)	(219,087)	0
Appropriation funding ^a	1,542,000	1,422,371	663,915	219,087	0
Balance after appropriation	0	0	0	0	0
Forecast opening balance	(801,164)	(801,164)	(801,164)	(801,164)	(801,164)
Transfer	0	0	0	0	0
Forecast closing balance	(801,164)	(801,164)	(801,164)	(801,164)	(801,164)

Note: Numbers in brackets are negative. a. Appropriation allocated from 2025–26 to 2028–29 is notional until financial results are finalised and published in the department's annual report.

Notable movements between 2025–26 and forward estimates from 2026–27 are due to:

- inflation where employee related expenses increase by 3% per annum and supplier costs increase by 2.7%
- updates to the department's cost base to incorporate ongoing operational expenses (e.g. maintaining security of ICT systems through the CapSTAR program)
- change of funding mechanism, from appropriation to cost recovery, for existing regulatory activities described in [section 1.2](#)
- inclusion of the new regulatory efficiency program described in [section 1.2](#) in cost recovery arrangement from 2027–28
- regulatory prices remaining unchanged for 2026–27 through continued full supplementation for the cost recovery revenue gap that existed as of the 2025–26 budget
- \$80,000 addition to the cost base for activities within the National Residue Survey, including \$50,000 for additional testing to cover requirements for China and the European Union
- \$75,000 increase in travel expenses when compared to the 2024–25 Budget to support increased levels of regulatory work and importing country reviews
- \$75,000 addition to the cost base to maintain the risk-based digital platform supporting the approach for audits of low-risk commodities. The total cost of the platform is \$150,000 per

annum, split equally between the dairy exports arrangement and fish and egg exports arrangement

- Expected uplift in revenue through adjustments in price and volume as cost recovery for additional regulatory activities are phased into the arrangement and phased reduction of revenue gap commencing in 2027–28, as described in [CRIS updates](#).

7 Financial and non-financial performance

This section provides an overview of our performance in recovering forecast costs and meeting regulatory objectives.

7.1 Financial performance

The financial performance for fish and egg exports cost recovery arrangement is provided in Table 9.

Table 9 Financial performance for fish and egg exports cost recovery arrangement, 2021–22 to 2024–25

Finance element	2021–22 (\$)	2022–23 (\$)	2023–24 (\$)	2024–25 (\$)
Revenue = X	3,563,906	3,866,257	4,030,657	4,280,464
Expenses = Y	3,818,425	3,896,911	4,635,248	5,507,782
Balance = X – Y	(254,520)	(30,654)	(604,592)	(1,227,317)
Remissions, rebates and adjustments = Z	254,520	17,021	604,592	1,227,317
Net balance = balance + Z	1	(13,633)	0	0
Balance	(814,797)	(801,164)	(801,164)	(801,164)

7.2 Summary financial performance 2024–25

The fish and egg exports 2024–25 CRIS forecast a surplus of \$34,534. Actual expenditure totalled \$5.5 million with cost recovery from participants returning \$4.3 million, resulting in a deficit of \$1.2 million (Table 10).

Table 10 Summary of financial position for fish and egg exports cost recovery arrangement, 2024–25

Category	Actual (\$)	CRIS (\$)	Variance (\$)	Variance (%)
Revenue	4,280,464	4,125,710	154,754	4
Expenses	5,507,782	4,091,176	1,416,606	35
Net surplus/(Deficit)	(1,227,317)	34,534	(1,261,851)	<-100
Appropriation	1,227,317	n/a	n/a	n/a
Balance	(801,164)	n/a	n/a	n/a

n/a Not applicable

7.3 Non-financial performance

Our [Annual report 2024–25](#) provides comprehensive information on performance measures and performance results. Rather than duplicating information from the *Annual report 2024–25*, this section highlights the key objectives and performance results relevant to exports cost recovery arrangements. Non-financial performance measures are given as high-level objectives and are not reported at a level specific to each arrangement.

For a complete picture of our performance, see Annual report 2024–25, Part 1: Annual performance statements – Our performance measures.

Objective 1 Sector growth

Support Australia’s agricultural sector, including the food and fibre industries, to be increasingly prosperous and internationally competitive in an ever-changing world.

Key activity 1.1 Support sector productivity growth and innovation

Measure SG–01	Greater growth in average agricultural productivity (adjusted for climate and weather effects) for the past 10 years, compared with average annual market sector productivity growth over the same period
Measure type	Quantitative effectiveness measure
Target	Greater than 0% difference over past 10 years
Sources	<i>Corporate Plan 2024–25</i>
	<i>Portfolio Budget Statements 2024–25</i> Programs: 1.1, 1.3, 1.4, 1.5, 1.6, 1.7, 1.8, 1.9, 1.10, 1.12.
Result	Achieved – agricultural productivity growth was sustained at a higher rate (0.80%) than the average annual market sector growth rate (0.19%)
Tolerances	Achieved– average annual growth in the agricultural productivity (climate-adjusted) series exceeds average annual market sector productivity growth over the same period. Partially achieved– not applicable. Not achieved– average annual growth in the agricultural productivity (climate-adjusted) series is lower than average annual market sector productivity growth over the same period.
Measure SG–02	Equal or reduced cost of levies administration compared with levies disbursed
Measure type	Quantitative effectiveness and regulatory measure
Target	Cost is less than or equal to 1.2% of levies disbursed
Sources	<i>Corporate Plan 2024–25</i>
	<i>Portfolio Budget Statements 2023–24</i> Programs: 1.1, 1.3, 1.4, 1.5, 1.6, 1.7, 1.8, 1.9, 1.10, 1.12.
Result	Achieved – Cost was \$6.94 million or 1.10% of levies disbursed
Tolerances	Achieved – levies administration cost is less than or equal to 1.2% of levies disbursed Partially achieved – not applicable Not achieved – levies administration cost is more than 1.2% of levies disbursed

Key activity 1.2 Regulate exports and enable, improve and protect access to international markets

Measure SG-04	Grow access to a diverse range of international markets for Australian exporters of agricultural, fisheries and forestry products
Measure type	Qualitative output
Target	Each year, the department can qualitatively describe the impact of technical market access achievements and how these achievements grow access for Australian agricultural, fishery and forestry (AFF) producers. Achievements may include opening, improving, maintaining or restoring access
Sources	<i>Corporate Plan 2024–25</i> <i>Portfolio Budget Statements 2024–25</i> Program: 1.13
Result	Achieved – technical market access was either opened, improved, restored or maintained across 79 export pathways: opened 10 new export pathways, improved 44 export pathways, maintained 17 export pathways and restored 8 export pathways
Tolerances	Achieved – the department provides examples of opening, improving, maintaining and restoring technical market access for different markets and different commodities. Examples of market access changes have been implemented and are available to agricultural exporters. Partially achieved – the department provides examples of opening, improving, maintaining or restoring access but not all 4. Alternatively, if the examples do not demonstrate that clear benefits have been achieved for different markets and commodities (i.e. examples are all focused on a single market or commodity, or the achievements are not of value to Australian exporters). Examples of market access changes have been implemented and are available to AFF exporters. Not achieved – the department cannot provide any examples of opening, improving, maintaining or restoring access to any markets or commodities.
Measure SG-05	Significant representation of Australian interests on multilateral standard-setting bodies.
Measure type	Quantitative proxy
Target	At least one meeting, with in-person attendance, to each of the multilateral trade standard-setting bodies (WTO, OECD, WOH, IPPC, and Codex).
Sources	<i>Corporate Plan 2024–25</i> <i>Portfolio Budget Statements 2024–25</i> Program: 1.13
Result	Achieved – representatives of the department attended 7 meetings with the WTO, 12 with the OECD, 8 with the WOH, 15 related to the IPPC and 6 with CODEX
Tolerances	Achieved – there is evidence the department has represented in-person at each of the multilateral trade standard-setting bodies WTO, OECD, WOH, FAO (IPPC and Codex) Partially achieved – there is evidence the department has represented in-person at least one, but not all, of the WTO, OECD, WOH, FAO (IPPC and Codex) Not achieved – the department does not participate in-person at any of the WTO, OECD, WOH, FAO (IPPC and Codex)
Measure SG-06	Effective delivery of regulatory responsibilities for relevant export applications under the Export Control Act 2020.
Measure type	Quantitative, effectiveness and regulatory
Target	Establish a baseline

Cost recovery implementation statement: fish and egg exports 2026–27

Sources	<i>Corporate Plan 2024–25</i>
	<i>Portfolio Budget Statements 2024–25</i> Program: 1.13
Result	Achieved – 99.83% of all relevant export applications were completed within the requisite consideration period. This sets the baseline
Tolerances	Achieved – over 95% of all relevant export applications are completed within the requisite consideration period specified by the Export Control Act 2020 Partially achieved – over 85% of all relevant export applications are completed within the requisite consideration period specified by the Export Control Act 2020 Not achieved – under 85% of all relevant export applications are completed within the requisite consideration period specified by the Export Control Act 2020
Measure SG-07	Increase in the number of electronic certificates issued for export
Measure type	Quantitative efficiency and regulatory
Target	Plus 2% from the final 2023–24 eCert number is
Sources	<i>Corporate Plan 2024–25</i>
	<i>Portfolio Budget Statements 2024–25</i> Program: 1.13
Result	Achieved – 12.5% increase in the number of electronic certificates issued for export (84,180 in 2024–25 compared with 74,661 in 2023–24)
Tolerances	Achieved – 2% or more increase Partially achieved – 1–1.99% increase Not achieved – Less than 1% increase

8 Review process

We continue to consider and be guided by the Australian Government policies outlined in the [Australian Government Charging Framework section](#), as we analyse, design and, as appropriate, implement a new funding model for our export regulatory and non-regulatory trade services. We review all cost recovery arrangements and update our CRISs annually. Figure 2 outlines the annual CRIS review process.

Updates to CRISs may result from:

- changes in cost inputs (increasing or decreasing)
- changes in operating environment
- stakeholder feedback
- policy changes
- internal monitoring and evaluation.

This ensures charging activity remains aligned with government policy priorities, relevant legislation and the minimum efficient cost of departmental effort.

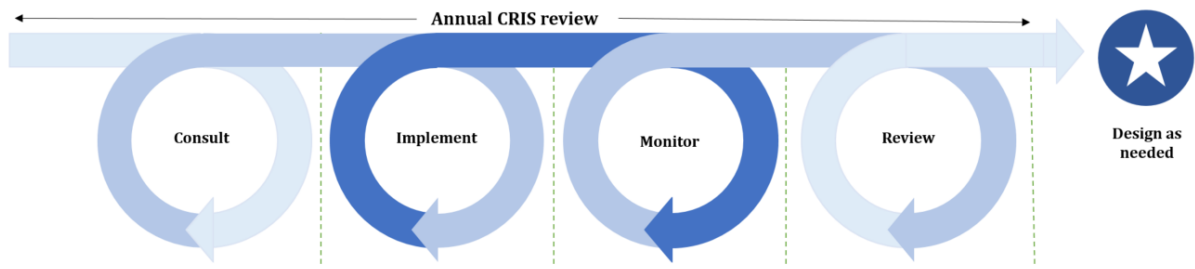
We are working with the Department of Finance to conduct a portfolio charging review (PCR). A PCR is a periodic review required under the Charging Framework and administered by the Department of Finance. PCRs are generally conducted every 5 years and are intended to provide assurance that an entity's charging activities remain appropriate, transparent and consistent with government policy.

The PCR considers whether activities that fall within the scope of the Charging Framework are being charged appropriately, whether charging arrangements remain fit for purpose, and whether governance, transparency and financial management practices support sound cost recovery outcomes. Where relevant, a PCR may also consider whether any chargeable activities are not currently subject to charging and, if so, whether the department has the authority to bring forward charging proposals through the Budget process. The PCR outcomes may inform future CRIS development.

For exports cost recovery arrangements, the current PCR has been scoped to avoid duplicating the work undertaken in developing the sustainable funding model for export regulatory activities. It complemented the work on sustainable funding by providing high-level assurance that export charging activities are appropriately classified, governed and aligned with the Charging Framework.

To ensure transparency and accountability in the CRIS development process, we will seek feedback from affected parties through stakeholder consultation prior to implementation of future CRISs.

Figure 2 Annual CRIS review process



9 CRIS approval and change register

Table 11 tracks the changes to the CRIS as a result of changes to the regulatory charging activity.

Table 11 CRIS approval and change register

Date of change	CRIS change	Approver	Basis for change
8 May 2026	Certification of the CRIS	Secretary, Department of Agriculture, Fisheries and Forestry	Confirmation of regulatory charging activity and validation of cost model
21 May 2026	Approval of CRIS	Minister for Agriculture, Fisheries and Forestry	

Appendix A: Cost recovery model

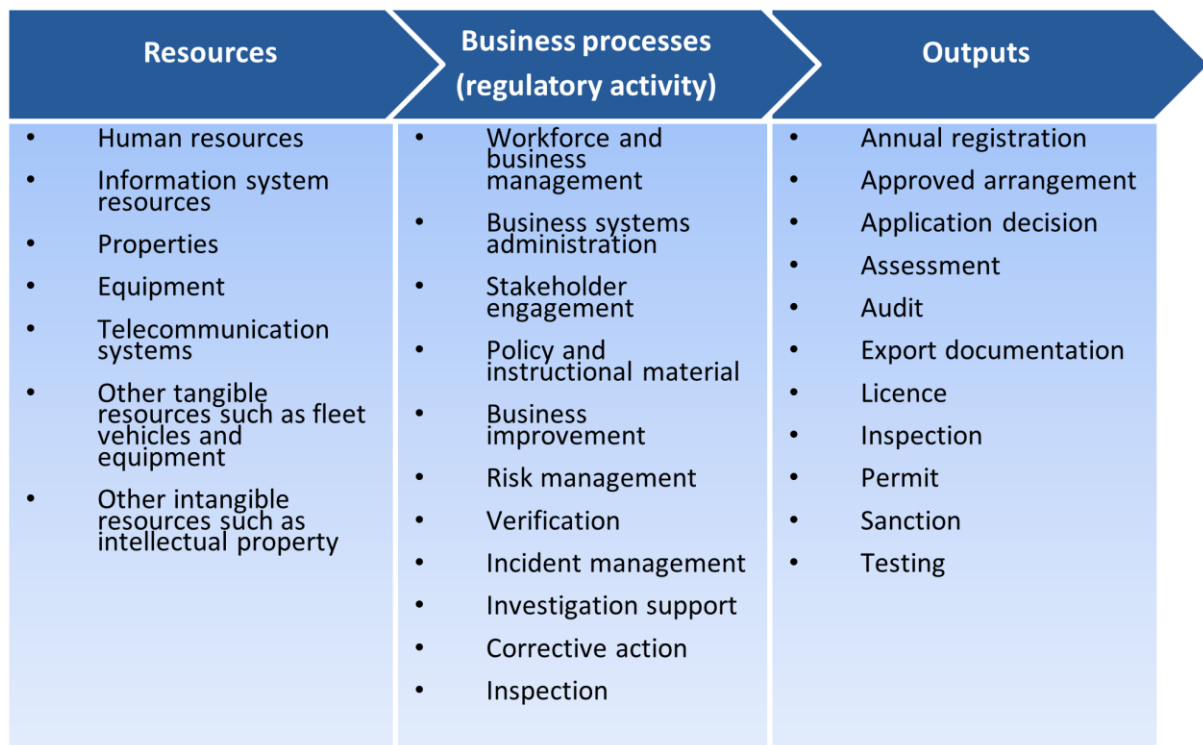
Regulatory charging activity outputs and business processes

The key policy objectives of our 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, 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 we use resources (such as people, IT, property and equipment) to undertake business processes (regulatory activities). These processes enable us to provide outputs that meet our policy objectives (Figure A1).

Figure A1 Regulatory charging activity outputs and business processes



The processes listed in Figure A1 are grouped into 4 categories:

- 1) **Direct regulatory intervention** – activities provided directly to an individual, business or organisation to meet export regulatory activity requirements.

- 2) **Program management and administration** – administrative activities that support and deliver our export regulatory commitments.
- 3) **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.
- 4) **Incident management** – activities that respond to incidents concerning alleged breaches of Australian regulation or international import conditions.

Costs of regulatory charging activity

Cost allocation process

To determine the cost of regulatory activities, we use an activity-based costing (ABC) system endorsed by the Department of Finance. The ABC system allows for complex cost allocation calculations while also being efficient and effective to administer.

The 2 expense categories are:

- 1) **Direct expenses** – these can be directly attributed to the provision of an activity (e.g. inspections). They comprise staff salaries and supplier costs, including direct capital expenses.
- 2) **Indirect expenses** – these are not directly linked to an activity we provide. They 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 expenses) and direct expense to the processes and activities defined in [Description of cost model activities](#). We include indirect expenses in the cost base to reflect the systems and processes that exist to help with efficient administration, which benefit the cost-recovered arrangements. This methodology for allocation of indirect costs to cost recovery arrangement is consistent with our cost allocation policy. This methodology is also used for the allocation of indirect costs into functions funded by government appropriation.

The ABC system allocates costs in a staged approach.

Stage 1 Cost base by cost centre

Cost centre managers in regulatory areas set budgets in accordance with the resources required to perform their function. Indirect costs such as property, finance, information technology, human resources and divisional executives are then allocated to these direct cost centres using a cost driver, which estimates the relative usage of each of the corporate services. Cost drivers for corporate services include:

- **Work points** – distributes costs based on space occupied, with the work point count reflecting the space where a person may be able to work.
- **Full-time-equivalent (FTE)** – distributes costs based on each program's full-time equivalent staff numbers.
- **IT assets** – distributes costs based on the number of IT assets (including PCs, laptops, tablets and printers) in a program.

- **Transactions** – distributes costs based on the number of transactions incurred over a period, and is used to allocate expenses related to the functions of accounts receivable and accounts payable.
- **Headcount** – allocates costs based on the number of staff that a program area has as a proportion of the total number of staff in the department.
- **Custom drivers** – allocate costs to specific cost centres, primarily based on usage for shared program resources.

Cost drivers are reviewed annually, or as required. Changes to cost drivers are substantiated through effort analysis or other supporting data.

Stage 2 Allocation of costs to activities and programs

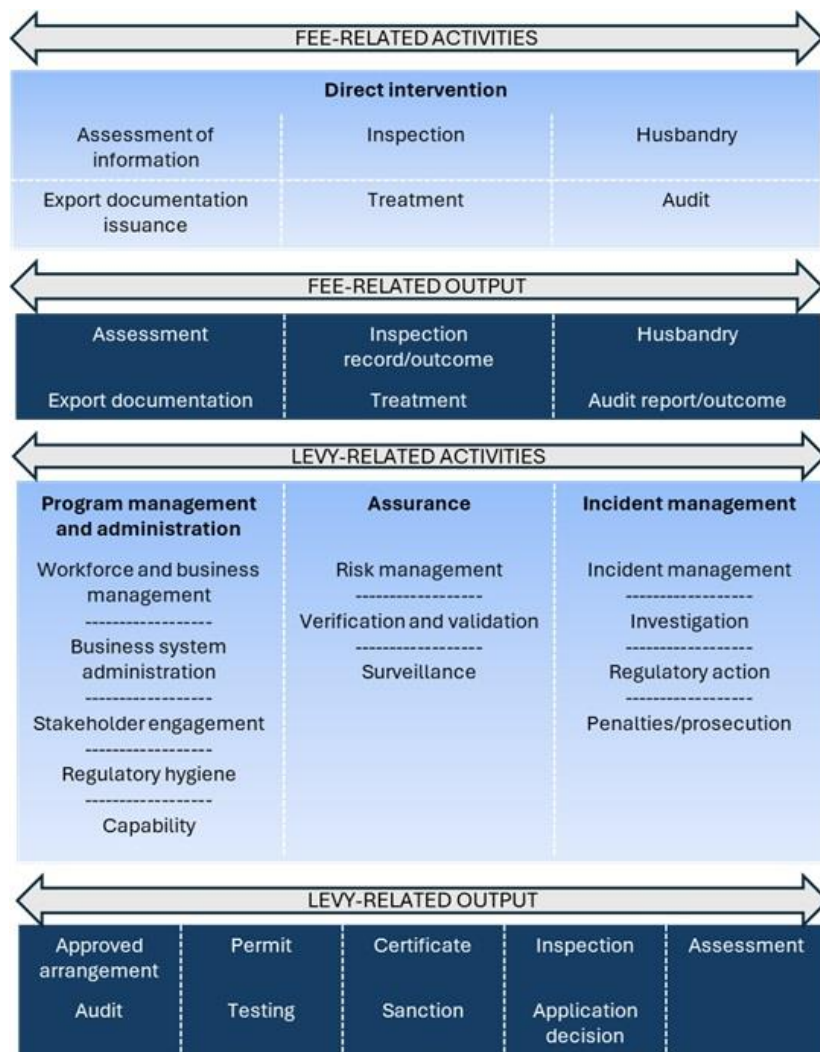
Direct cost centres (including the indirect costs allocated in Stage 1) are allocated to the activity and cost-recovered arrangements that best reflect the activity undertaken. For example, food safety auditors undertake audits across multiple arrangements. Time-recording systems allow the accurate allocation of effort to specific activities and arrangements, particularly to intervention activities.

Volumetric forecasts are then applied to estimate the total amount of activity within each arrangement. For example, in the case of food safety audits this includes the number of audits and average time for an audit of each arrangement. The associated costs are allocated to the arrangements and audit function based on total audit hours.

Stage 3 Allocation of costs to regulatory services (charge points)

Activity and arrangement costs (from Stage 2) are allocated to charge points, which identifies the cost associated with that charge. We use a combination of cost recovery fees and levy-based charges. Figure A2 shows the categorisation of cost-recovered levy-based charge and fee activities and outputs.

Figure A2 Category of activities



Description of cost model activities

This section details the cost model activities undertaken in our cost recovery arrangements.

Direct intervention activities

Assessment of information

Assessment of information we received for consideration of an application made under the Export Control Act.

Export documentation issuance

Involves the systems and processes for issuance of an export document (including government certificates, export permits, tariff rate certificates) under the Export Control Act.

Inspections

Examination (or supervision of), whether physical or otherwise, of a good, conveyance, place or process to determine compliance with Export Control Act, subordinate legislation, relevant policies, and importing country requirements.

Treatment

Includes the physical treatment of cargo, vessels, plants, animals, food, biological and genetic material, other conveyances or premises, to ensure requirements of the Export Control Act, subordinate legislation, relevant policies, and importing country requirements are satisfied.

Husbandry

Includes activities relating to the care of plants and animals, such as, transport, housing, daily monitoring, feeding, cleaning of facilities, administering of medication, bookings and client assistance.

Audit

The examination of a legislative permission holder's systems, process or performance under Part 1, Chapter 9 of the Export Control Act to determine whether activities and related results comply with legislation, policies and importing country requirements.

Program management and administration activities

Workforce and business management

This activity has 4 categories:

- 1) **Workforce management** – 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** – 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** – billing and accounting, budgeting, charges and payments, collections and receivables, debt management, financial accounts, reporting and policy development.
- 4) **Information management** – 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, communication technology and system changes necessary to meet importing country requirements.

Stakeholder engagement

Involves engagement with any person, business, organisation (including peak industry bodies) or country competent authority for the purpose of administering and delivering export regulatory systems and services – including any associated travel, secretariat support and attendance at industry consultative committee meetings, country competent authority meetings, publishing website content and other information.

Capability

Includes development, delivery, review and validation of training and assessment programs to support regulatory capability uplift, legislative and importing country requirement compliance.

Regulatory hygiene

Includes activities to review, develop and maintain a contemporary and fit-for-purpose export regulatory framework and system including:

- export control legislation
- regulatory, operational, and corporate policies
- scientific and technical advice
- instructional material such as guidelines; work instructions and templates
- initiatives to monitor and improve regulatory system performance.

Assurance activities

Risk management

Involves identifying, assessing, and managing risks posed to Australia's agricultural export system, trade, and market access, including regulatory risk exploration, risk assessment and compliance monitoring. This includes communication of risk analysis results, modelling and forecasting to operational areas and the collection, receipt and use of data, information, and intelligence to meet compliance objectives. This work also includes associated travel and client assistance, such as assessment of risks associated with cargo, vessels, plants, animals, food, biological and genetic material.

Verification and validation

Includes activities providing confidence and assurance that controls Australia's industry and regulatory systems and processes are operating in accordance with their intended design and associated documentation and are addressing, controlling or mitigating identified risk.

Surveillance

Oversight and delivery of national or targeted monitoring and detection programs necessary to underpin Australia's pest, disease, or food safety status, and ensure Australian exports comply with importing country requirements, to maintain market access.

Incident management activities

Incident management

Includes coordination and management of any incident, such as food safety, domestic pest or disease outbreak or post-export matter. This activity falls within the objects of the Export Control Act and is for the purpose of maintaining market access. This includes all associated pre- and post-work, trading partner engagement, travel and client assistance in relation to an incident, whether there is an alleged non-conformance or otherwise.

This definition does not include work associated with the consideration or decision on any application, which may be made under the Export Control Act in relation to the incident (this work effort is accounted for in the 'intervention' category).

Investigation

Includes investigation support for enforcement activities relating to an alleged breach of portfolio legislation, including any related client assistance and travel.

Regulatory action

Includes all activities taken in response to alleged non-conformance and non-compliance with or in contravention of export legislation or procedures, including follow-up, investigation, briefing, decision-making and implementing regulatory action or sanctioning.

This definition does not include those activities carried out under the penalties and prosecutions definition.

Penalties and prosecutions

Activities carried out to manage or deliver civil and criminal penalties and prosecutions (unless covered by cost recovered incident management).

Appendix B: Summary of stakeholder feedback

Table B1 Stakeholder feedback for the 2026–27 CRIS

Key theme	Stakeholder feedback	Department response
Consultation	<p>Stakeholders conveyed that the initial consultation period was too short given the complexity of information, and requested a longer period of time to provide submissions.</p> <p>Stakeholders commented that they would have liked further consultation in the lead up to the decision of government.</p>	<p>The department recognises the importance of providing industry with clear information and the genuine opportunity to comment on how cost recovery arrangements are implemented. The department extended the submission timeframe by an additional 2 weeks until Friday 20 March 2026.</p> <p>Budget decisions are made by government through Cabinet. The Australian Government has made the decision to return to full cost recovery. That decision was compliant with the Budget Process Operational Rules (BPORs), which include several requirements related to the impacts of government decisions.</p> <p>Consultation focused on implementation of that decision. The draft cost recovery implementation statement (CRIS) consultation offered the opportunity for industry to provide feedback on the cost modelling, assumptions and fees and levy-based charges.</p>
Independent audit	<p>Stakeholders requested an independent audit of the departments export regulatory cost base.</p>	<p>The department is held accountable through various mechanisms for proper use of financial resources. The department considers these mechanisms are sufficient to ensure the proper use of financial resources without additional audits required.</p> <ul style="list-style-type: none"> • Parliament: The department is accountable to Parliament and accounts for its performance, the expenditure of public funds and how decisions are made. • Budget Process Operational Rules: BPORs are mandatory rules that outline the major administrative and operational arrangements for managing the budget and its related processes. • Australian National Audit Office (ANAO): The ANAO examines and reports on the department's actions and whether public resources are being used economically, efficiently, effectively and ethically. • Australian Government Charging Framework: The department applies this framework to all activities that deliver goods, services or regulation to an individual or organisation in the non-government sector. • Portfolio Charging Review: The department must examine all activities in-scope of the Charging Framework within the portfolio at least every 5 years, in accordance with the published schedule of Portfolio Charging Reviews (PCR) or at other times agreed by the Finance Minister. • Industry consultative committees (ICCs): The department regularly engages with industry on significant operational and financial developments affecting specific arrangements through established ICCs. This provides an opportunity for industry feedback. <p>The department is committed to ongoing discussions with industry to improve understanding of departmental expenses, and enhancing financial and non-financial reporting and monitoring.</p>

Cost recovery implementation statement: fish and egg exports 2026–27

Key theme	Stakeholder feedback	Department response
Timing	Stakeholders raised concerns about impacts from the current Middle East conflict, and whether the timing of the implementation could be extended to accommodate the current global uncertainty regarding access to farm inputs and supply chains.	<p>The department notes that the Australian Government made the decision to provide additional supplementation to defer the phased return to full cost recovery by 12 months, until 1 July 2027. This decision recognised the disruptions being experienced by Australia’s farmers and producers due to the conflict in the Middle East.</p> <p>As a result of this decision, the 2025–26 export CRIS prices will largely stay in place, and full cost recovery is still scheduled to be in place from 1 July 2029.</p>
Efficiency	Stakeholders provided feedback that the review focus has been on revenue and had an insufficient look at cost base, delivery costs and operational efficiency.	<p>The department is required under the Australian Government Charging Framework to recover the efficient cost of delivering regulatory services whilst meeting regulatory requirements and service standards. Internal budgets are set according to this standard and monitored by the department’s Finance and Investment Division and internal governance.</p> <p>Improvements and efficiencies have been realised from digital and assurance reform projects. At the same time, factors such as wage growth and increasing regulatory complexity have driven an increase in the cost of providing services and therefore no overall direct reduction in program cost has been observed.</p> <p>The department has also been making capital investments in its enabling capability from appropriation funding, that drive efficiencies into regulatory activities. Efficiencies include implementing flexible working arrangements at regional offices, investing in ICT security uplifts, and converting contractors performing enabling activities to APS employees.</p> <p>Current pricing reflects a reassessment of the true cost of service delivery, and that previous systemic under- (or over-) recovery should not continue.</p>
Efficiency	Stakeholders queried the methodology of allocating costs and indirect costs (corporate overheads).	<p>Cost allocations for direct and indirect costs are based on approved cost drivers—such as full-time equivalent staff (FTE), headcount, work points, IT assets, transactions, or custom drivers—that are designed to fairly reflect usage while remaining efficient to administer. These drivers are reviewed at least annually, with any changes requiring evidence, and Chief Financial Officer (CFO) approval. The overall approach balances accuracy, transparency, and administrative efficiency in reporting the net cost of delivering government outcomes and programs.</p>
Regulatory reform	Stakeholders raised concerns about the department’s ability to implement effective reform and concerns the department is adding layers of complexity to compliance requirements.	<p>The department works to deliver an efficient service while ensuring effectiveness in meeting our regulatory obligations and service standards.</p> <p>Some examples of regulatory efficiencies that the department has delivered include:</p> <ul style="list-style-type: none"> • creating an export facilitator service for the dairy, egg and seafood industries, which provides tailored assistance to industry looking to become export registered that: <ul style="list-style-type: none"> – significantly reduces the time it takes for new entrants to achieve export registration – enables companies to export their products much quicker than previously experienced • developing and implementing a new audit approach for low-risk export establishments, which will streamline audits and use information to assess compliance with export and importing country requirements and result in benefits such as:

Cost recovery implementation statement: fish and egg exports 2026–27

Key theme	Stakeholder feedback	Department response
		<ul style="list-style-type: none"> – reduced regulatory burden and greater efficiency through removal of onsite auditing – increased industry time savings through less burdensome regulatory requirements – a regulatory system for trading partners that is risk-based and maintains the robust food safety assurances by using technology, information and data. <p>The department is committed to continuing to work with industry to make regulatory service improvements that meet their needs and regulatory requirements.</p>
Regulatory reform	Stakeholder raised potential improvements to the National Residue Survey for sampling.	The department appreciates industry feedback on the National Residue Survey and will consider this information.
Price structure	Stakeholders sought further transparency on how fees and levies are calculated, and why they are different.	Further information on pricing pools and charge points, and the difference between fees and levies were communicated through in-location and industry meetings, and information published on the Have Your Say page.
Price structure	Stakeholders raised concerns around cross-subsidisation of fish and egg in the one arrangement, and would like greater scrutiny of costs.	The fish and egg arrangement is allocated based on usage charges for each commodity using these drivers.
Price structure	Stakeholders queried whether there could be adjustments from shared levy-based charges to individual fees, with Fit and Proper Persons assessment as an example.	<p>A key principle for determining whether a fee for service or a levy-based charge is applied is whether the activity is directly attributable to a specific entity, or whether the demand is created by a wider group.</p> <p>Some activities are classified as levy-based charges because they are integral to the ongoing operation, assurance and integrity of Australia’s export regulatory system under the <i>Export Control Act 2020</i>, and their delivery supports the collective ability of Australian exporters to access and maintain international markets. While these activities result in an outcome for an individual entity (such as a registration, approval or certificate), they are not a standalone service delivered on request. Instead, they are the regulatory outputs of broader, system wide activities including regulatory system management, assurance, compliance oversight and market maintenance, which must be delivered consistently regardless of individual demand. As such, the costs of these activities are appropriately recovered through levy-based charges that distribute costs across the benefiting export cohort.</p> <p>The department has re-examined where certain services and functions can be more directly attributed to individual entities or smaller groups of individuals which has resulted in updates to some of the fees and levy-based charges.</p>
Rationale for charging	Stakeholders raised concerns that there were significant cost increases and wanted to understand why these costs would be increasing in this way.	<p>The cost of providing export regulatory services has been greater than cost recovery revenue since the 2017-18 financial year. Government has supplemented the revenue from industry across all export arrangements to ensure export regulatory services continue to be delivered, and this will continue for another 12 months. Since the last substantial CRIS update in 2020–21 there has continued to be increases in the complexity of importing country requirements, cost base pressures such as supplier cost and wages, and increases in export volume and demand for services.</p> <p>In developing the CRIS, the fees and levy-based charges for the fish and egg arrangement have been calculated based on the effort required across the arrangement and allocated to the relevant charge point, such as certification, documentation,</p>

Cost recovery implementation statement: fish and egg exports 2026–27

Key theme	Stakeholder feedback	Department response
Rationale for charging	Stakeholders queried why market access activities are to be fully funded by exporters, when industry consider these public good activities.	<p>registration and audit. The increase in prices reflects the cost of delivering these services and/or the relative under recovery in recent years. The other factor in prices being different between exports arrangements is the difference in activity volumes. Each fee or levy-based charge is determined by dividing the cost of providing that service within an arrangement by the number of times the activity is charged. Where a cost is fixed or relatively inelastic, a smaller volume of activity would be reflected in a higher fee or levy-based charge. This emphasises the importance of reasonable activity volumes within the CRIS.</p> <p>These cost increases are being phased in with supplementation from government over a 2-year period, with supplementation continuing for 2026–27, and phasing in 2027–28 and 2028–29 to support industry with the transition.</p>
Impact of price increase	Stakeholders gave feedback that with significant cost increases, particularly certification costs, along with existing compliance burdens, this would negatively impact on businesses. In particular, the seafood industry noted the 2025 SafeFish issues paper on contaminant monitoring, and how this would reduce export competitiveness. The egg industry also noted impacts from avian influenza, importing country policy changes and supply chain disruptions.	<p>The department acknowledges that there are broad industry concerns about rising costs and notes the feedback from industry that significant fee increases could undermine export competitiveness. The department acknowledges this could also affect market behaviour.</p> <p>The department notes that economic and geo-strategic factors may impact on export markets and therefore cost model assumptions. The department will continue to review and monitor impacts after implementation.</p>
Impact of price increases	Stakeholders raised concerns that the small-scale organics sector would be disproportionately impacted compared with larger commodity sectors. Stakeholders raised that the public benefits of organic agriculture to areas such as emissions reduction and biodiversity should be recognised through an offset in prices.	<p>The department acknowledges there are specific organic sector concerns about rising costs, noting the price changes in the export CRIS apply to all users of the department’s export regulatory services. The development of the costing model has determined the cost of delivering the regulatory services which includes effort that does not vary by the size or nature of the organisation.</p> <p>The department will continue to monitor impacts after implementation.</p> <p>The department confirms the default position of the Australian Government Charging Framework is to charge for regulatory activities where demand is created by an identifiable group, unless government decides otherwise. As exporters and operators create the demand for export regulatory services the department is obliged to cost recover for these services.</p>