



Australian Government

**Department of Sustainability, Environment,
Water, Population and Communities**

**Wildlife Trade Permits - Cost Recovery under the
*Environment Protection and Biodiversity Conservation Act 1999***

COST RECOVERY IMPACT STATEMENT

(July 2013 – June 2018)

Version Control

Version	Author	Date	Comments
0.1	The Department of Sustainability, Environment, Water, Population and Communities	May 2013	
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1.0			

Glossary of terms

Cost Recovery Guidelines	Australian Government document outlining the policy principles and criteria for cost recovery activities
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CRIS	Cost Recovery Impact Statement
Consultation Paper	The EPBC Act Cost Recovery Consultation Paper (September 2011)
EPBC Act draft CRIS	Draft Cost Recovery Impact Statement - <i>Environment Protection and Biodiversity Conservation Act 1999</i> (May 2012)
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
Fee Point	The point in the application process that a fee is charged
'Free-rider' effect	Where a party can avoid costs by waiting for another party to pay a fee and seek approval first (i.e. 'free riding' on the approval of others)
The department	The Department of Sustainability, Environment, Water, Population and Communities
SER	Specimen export record

Staffing classifications

APS 4	Permit Officer
APS 5 / 6	Senior Permit Officer
EL 1	Permit Team Manager
EL 2	Section Manager (Director)

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1 OVERVIEW

1.1 Purpose of this document

The purpose of this Cost Recovery Impact Statement (CRIS) is to document wildlife trade permit cost recovery arrangements under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), and transparently demonstrate compliance with the *Australian Government Cost Recovery Guidelines* (Cost Recovery Guidelines). This CRIS also demonstrates that the fees are only partially recovering the cost of issuing wildlife trade permits to avoid creating an incentive to bypass the regulations and encourage illegal wildlife trade if full costs were recovered.

1.2 Background to cost recovery for wildlife trade permits under the EPBC Act

In 2011 the Government's response to the independent review of the EPBC Act committed to investigate potential cost recovery under the EPBC Act. A stocktake of all regulatory functions was completed, and it was proposed that new cost recovery for environmental impact assessments and some strategic assessments, as well as an increase to existing fees for wildlife trade, was appropriate because:

- the activities deliver a clear benefit for a particular beneficiary;
- charging for these activities does not deliver a 'free ride' for other applicants;
- charging for these activities is consistent with policy goals under the EPBC Act; and
- it is efficient to implement cost recovery arrangements on a 'fee for service' basis, as the Department of Sustainability, Environment, Water, Population and Communities (the department) can measure and attribute costs of relevant services to individual applicants and recover them at statutory decision points.

Consultation on these cost recovery proposals took place through the *Consultation Paper on Cost Recovery under the EPBC Act (2011)*. Government subsequently agreed to new cost recovery for environmental impact assessments and some strategic assessments, and an increase to existing fees for wildlife trade. These decisions were outlined in the 2012-13 Budget.

This CRIS outlines cost recovery arrangements for the amended wildlife trade permit fees. A separate CRIS is required to detail cost recovery arrangements for environmental impact assessments and strategic assessments once they commence.

In response to the outcomes of consultation in 2011, the following changes were made to the wildlife trade permit cost recovery arrangements, as was reflected in the draft EPBC Act CRIS released in May 2012, and now in this final wildlife trade CRIS:

- Fees will increase to double the current level, as opposed to full cost recovery of the services which was initially proposed in the 2011 consultation paper;
- Annual fee indexation will be introduced to ensure that fees remain roughly proportionate to the costs of delivering the relevant services;
- Wildlife trade operations, captive breeding programs and aquaculture programs will not be cost recovered as it is not considered efficient; and
- The proposed business improvement charge will not proceed.

1.3 Australian Government Cost Recovery Policy

In December 2002, the Australian Government adopted a formal cost recovery policy to improve the consistency, transparency and accountability of its cost recovery arrangements and promote the efficient allocation of resources. The underlying principle of the policy is that agencies set charges to recover all the costs of a product or service where it is efficient and effective to do so, where the beneficiaries are a narrow and identifiable group, and where charging is consistent with Australian Government policy objectives. The Cost Recovery Policy is administered by the Department of Finance and Deregulation and is detailed in the Cost Recovery Guidelines.

The Cost Recovery Guidelines apply to all *Financial Management and Accountability Act 1997* (FMA Act) agencies and to relevant *Commonwealth Authorities and Companies Act 1997* (CAC Act) bodies. In line with the policy, individual portfolio ministers are ultimately responsible for ensuring agencies' implementation and compliance with the Cost Recovery Guidelines.

2 POLICY REVIEW – ANALYSIS OF ACTIVITIES

Currently, fees are imposed for the following types of wildlife trade permits:

- Single use permits
- Multiple consignment authority (formerly known as multiple use permits)
- Testing permits
- Facility assessments
- Import/export of regulated species (as required under section 303 FG under the EPBC Act – 'Household pet permits')
- Personal baggage permits
- Exceptional circumstances permits

Under the existing charging regime, the fees for wildlife trade regulatory activities do not fully recover the cost of delivering the services. Fees for most of the wildlife trade activities have not increased since the *Wildlife Protection (Regulation of Exports and Imports) Act 1982* was subsumed by the EPBC Act in 2001, and in some cases have not increased since 1993.

The department's 2011 consultation paper outlined the full cost of delivering the range of wildlife trade regulatory functions under the EPBC Act and sought stakeholder feedback on the impact of full cost recovery for these activities. Several stakeholders noted in their submissions that full cost recovery would have a significant impact across the board for industries that rely on these regulated activities, as most of these industries already operate at small profit margins. Noting other significant cost pressures, full cost recovery would have had the potential of reducing and/or prohibiting sales.

The department gave thorough consideration to the range of verbal and written stakeholder feedback received during the consultation period. As a result of this feedback, full cost recovery of most wildlife trade regulatory activities has not been pursued at this time. The department considers full cost recovery for these activities does not meet the requirements of the Cost Recovery Guidelines at this time, as it may stifle industry innovation, be inconsistent with policy objectives, and not be an efficient or effective charging arrangement.

Wildlife trade fee increases

Fees have been increased to better reflect the cost of providing the related services. The majority of fees for wildlife trade permits documented in this CRIS increased to approximately double the previous levels. This is considered to be the maximum fee increase that will not have a significant impact on the viability of relevant stakeholders.

While fee increases may appear to be large as a percentage, the actual fee increase has been minimised. Existing fees were set on a nominal basis, rather than reflecting the actual cost of providing the service. Fees have not been reviewed in over 10 years, and the increases documented in this CRIS maintain partial cost recovery and consistency with policy goals, including that of not resulting in a disincentive to comply with the requirements of the EPBC Act.

2.1 Policy authority

Policy authority to cost recover the wildlife trade related regulatory activities has recently been confirmed by Government in the 2012-13 Budget context.

Government authority for partial cost recovery of wildlife trade related regulatory activities was recently confirmed by the Minister for Finance and Deregulation. The cost recovery arrangements for wildlife trade regulatory activities will continue to operate on a partial cost recovery basis, and Government will continue to meet the remaining costs.

2.2 Legal requirements for the imposition of charges

The EPBC Act provides the legal authority to charge fees for permit applications, subject to the exemptions outlined in Regulation 18.04(f) of the Environment Protection and Biodiversity Conservation Regulations 2000 (EPBC Regulations). Exemptions include Commonwealth and state governments and agencies. The EPBC Regulations provide for the establishment of fees for the application of wildlife trade permits. Schedule 11 of the EPBC Regulations outlines the fee levels for permit applications.

The authority to index fees is provided under the Environment Protection and Biodiversity Conservation Amendment (Fees for Wildlife Trade Permits) Regulation 2013.

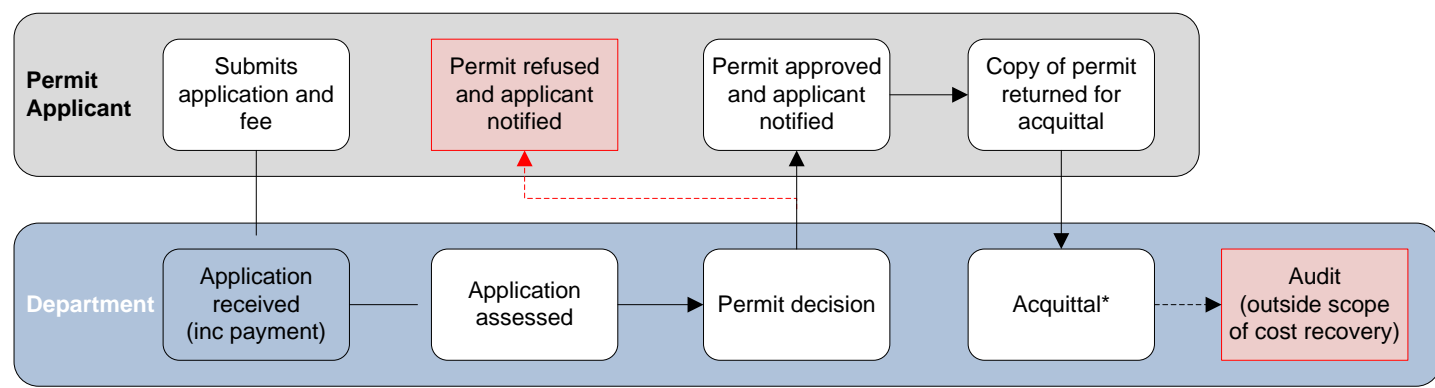
2.3 Description of activities

The services provided by the department relate to regulating the international trade of wildlife and wildlife products, including Australian native species and species listed on the Appendices to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Fees are currently charged for applications to obtain a permit related to international trade in wildlife and wildlife products.

The department also conducts regulatory wildlife trade activities which are not subject to cost recovery, including assessment of programs for the sustainable management of species regulated by the wildlife trade provisions of the EPBC Act; and monitoring, compliance, investigation and enforcement activities related to the regulation of wildlife trade. These activities contribute towards the protection of wildlife that may be adversely affected by trade and ensure that any commercial utilisation of Australian native wildlife for export purposes is

managed in an ecologically sustainable way. These activities are not covered in detail in this CRIS because costs are not recovered for these services.

The key steps in the application assessment and decision-making process for wildlife trade permits are shown in figure 2.1.



* An acquittal generally involves data entry of permit activity documentation and quality checking of permit conditions.

Figure 2.1 – Wildlife trade permit assessment process

Table 2.1 below provides descriptions of the types of tasks undertaken by the department in providing the wildlife trade permits service. More detailed descriptions of each particular task are provided in Section 3.

Table 2.1 – Wildlife trade permit process tasks

Permit type	Permit processing tasks
<ul style="list-style-type: none"> - Single use permits - Multiple consignment authorities - Testing permits - Personal baggage permits 	<p>Preparation and processing (permit officer): data entry, permit fee processing, prepare permit recommendation and mail out permit, or advice if refused.</p> <p>Quality assurance and approval (senior permit officer/permit team manager): undertake quality assurance of the process/data checking, and approve the permit.</p>
<ul style="list-style-type: none"> - Import/export of regulated species ('Household pet permits') - Facility assessments - Exceptional circumstances permits 	<p>Preparation and liaison (senior permit officer): liaise with the applicant, assess information against standards and codes relevant to the application, prepare an assessment report for decision maker, prepare feedback to the applicant on the application, and notify the applicant of the outcome of assessment.</p> <p>Quality assurance and approval (permit team manager): assist with applicant liaison, quality assurance, and approve/sign permit approvals. Management of website publishing may be required during public consultation on some permits.</p>

2.4 Users and Stakeholders

The main users of wildlife trade permits are individuals and entities involved in the international trade in wildlife and wildlife products. Applicants can range from individuals and small family businesses, to medium sized retailers and large multinational enterprises. Stakeholders also include a range of government entities. Costs relating to wildlife trade permits issued to government entities are not recovered, and are met by the department.

2.5 Conclusion

The department determined that a fee for service remains an appropriate cost recovery charge mechanism for wildlife trade permits under the EPBC Act. The issuing of permits represents a regulatory activity, the beneficiaries of the activity fall within a narrow identifiable group, and there are no free rider effects. The partial recovery of the costs for wildlife trade permits has been approved by Government as required under the Cost Recovery Guidelines.

3 COST RECOVERY MODEL DESIGN

3.1 Cost components

Although costs for wildlife trade permits will continue to be partially recovered, the following information is provided to demonstrate the methodology for measuring the full cost of delivering the services. The costs for issuing wildlife trade permits consist of:

Table 3.1 – Types of costs for issuing wildlife trade permits

Cost	Description
<i>Direct costs - costs that can be directly attributed to wildlife trade permit processing.</i>	<i>Salary expenses for departmental employees who provide wildlife trade permit services. This includes the time required to: assess and process permit applications, including that of permit officers, senior permit officers and permit team managers; provide technical support for business systems required for issuing permits; and to provide specialist legal services and advice on wildlife trade.</i>
<i>Indirect costs - costs that are often referred to as 'overhead' costs.</i>	<i>Indirect costs include a component of accommodation and property expenses, IT costs, and human resources support costs.</i>
<i>Supplier costs - costs that can be attributed to processing but are not generated by the department.</i>	<i>Wildlife trade permits are required to be printed on security water-marked paper, which are set at a fixed cost rate per permit.</i>

3.2 Costs and fees for cost recovered activities

Please note: The costs outlined for each permit are based on efficient processing of low to moderate complexity permit applications. The additional processing costs of more complex permits vary from case to case and are difficult to predict, so are not captured in the baseline cost for each permit and are instead met through Budget funding. Such additional costs may arise due to the need for intervention or involvement from a section manager, or senior executive, in processing very complex permits. In this way, the additional costs associated with processing more complex permits are not cross-subsidised by low to moderate complexity permit applications.

Single use permits

A permit is required under the EPBC Act to:

- import or export a CITES-listed specimen;
- export a regulated Australian native specimen; or
- import live animals and plants that are listed on the live import list as requiring a permit before being permitted for import into Australia.

Single use permits are valid for a single, specified consignment within a period of up to six months of the permit being issued (in the case of CITES specimens) or up to three years (in the case of native specimens). In practice, permits for native specimens are not normally issued for a period longer than 12 months.

Activities and recoverable costs involved in assessing a single use permit application

A single use permit is estimated to take a minimum of one hour of staff time to assess and process. This includes a proportionate contribution from a permit officer (68%), senior permit officer (16%), and permit team manager (16%). The total recoverable cost of a single use permit includes direct costs, indirect costs and supplier costs. Executive oversight costs of a section manager are not included in the recoverable cost of the service (see text box at the start of section 3.2). An outline of how permits are processed and approved is at Figure 2.1 and Table 2.1.

Additional time may be required to assess the application depending on the complexity of the permit application. The complexity of a permit application is partly due to the number of species that are required to be included on the permit but, more importantly, due to the differences in sources of the specimens and differences in supporting documentation that must be reviewed and verified. This process may involve the need to seek clarification from other government agencies or other areas of the department, and/or the applicant regarding sourcing of specimens.

The cost of assessing the permit application is still incurred, regardless of the outcome of the application assessment (that is, if the permit is issued or refused), because the regulatory effort must be expended to make a legally valid decision. Therefore, fees are not refundable should a permit application be refused.

The cost and fee summary for single use permits is represented in the table below. The new fee for single use permit applications will be \$61 of the total cost of \$198.97. This represents a doubling of the previous fee, plus indexation. The balance of the costs, including additional costs incurred for processing complex permit applications, will be met by government.

Direct cost	Indirect cost	Supplier cost	Total cost	New fee	Fee point – Single use permits
\$145.42	\$47.42	\$6.13	\$198.97	\$61	The application fee must be paid at the time of making an application.

Multiple consignment authorities

Multiple consignment authorities are an alternative to single use permits. Multiple consignment authorities allow for a number of consignments of a particular specimen or specimens for a period of up to six months (in the case of CITES specimens) or up to three years (in the case of native specimens). There are significant benefits to industry in obtaining longer term permits, such as lower costs where multiple consignments are required, compared to single use permits. However, longer-term permits do result in ongoing administrative costs for the department associated with acquittals of such permits. It is at the applicant's discretion as to which type of permit application they choose. Comparative costs are known to the applicant at the time they submit their application.

Multiple consignment authorities allow the permit holder to export consignments at any time during the period for which the permit is issued. Unlike single use permits, where the timing and content of the consignment is known by the department when the permit is issued, multiple consignment authorities require the permit holder to notify the department of each consignment. This notification is essential to enable the department to track the export of relevant species and specimens, which is a fundamental component of wildlife trade regulation under the EPBC Act.

Activities and costs involved in assessing a multiple consignment authority application

There are two cost components to the multiple consignment authority assessment: costs related to processing and assessment of the initial permit application; and the cost associated with ongoing administration of the specimen export records over the period of the permit. Both costs are outlined below.

Assessment of the initial permit application: As for single use permits, the initial assessment and processing of a multiple consignment authority is estimated to take a minimum of one hour of staff time to assess and process. This includes a proportionate contribution from a permit officer (68%), senior permit officer (16%), and permit team manager (16%). The total cost of the initial assessment includes direct costs, indirect costs and supplier costs. Executive oversight costs of a section manager are not included in the cost of the service. Total cost for the initial assessment is \$198.97, of which \$153 is recovered in fees. An outline of how permits are processed and approved is at Figure 2.1 and Table 2.1.

Additional time may be required to assess the application depending on the number of species that are required to be included on the permit and the complexity of the permit application, however these costs are not included in the respective fees. Complexity is primarily driven by whether there are precedents to the application, for example, a repeat applicant with a wildlife trade business that is known to the department, or how frequently the applicant imports a species or specimen.

The cost of assessing the permit application is still incurred, regardless the outcome of the application assessment (that is, if the permit is issued or refused), because the regulatory effort must be expended to make a legally valid decision.

Ongoing administration of the permit: Once a permit is issued, the applicant is required to provide the department with a copy of a specimen export record (SER) for each consignment that the applicant exports. The department must review each SER and enter them into the department's database. SERs can vary in detail depending on the volume and content of the consignment. On average, each SER takes approximately 50 minutes to quality check against the permit and enter into the database, including a proportionate contribution from a permit officer (82%) and senior permit officer (18%).

The number of consignments, and corresponding SERs, that a permit holder undertakes varies greatly. Based on departmental experience, multiple consignment authority holders generally require processing of at least three SERs every six months under a multiple consignment authority. This correlates to a minimum cost of processing for the department of \$155.16 per six months. This 'base-cost' estimate is conservative however, as many multiple consignment authority holders can require processing of a much higher number of SERs.

The department also notes that at least three separate consignments within a six month period are required in order for the permit holder to benefit financially from having a multiple consignment authority rather than a single use permit (i.e. three single use permits would cost \$183 in application fees, whereas three or more consignments under a multiple consignment authority is \$153).

Costs for providing business system and legal services required for issuing permits are accounted for in the initial permit application, and are not counted again in the ongoing administration cost for the facility assessment.

Fee and cost summary for multiple consignment authorities: The fees and costs for multiple consignment authorities are outlined in Table 3.2. The total permit fee includes the cost of the initial application and the ongoing administration. The ongoing administration cost component only applies to permits of greater than six months duration, at a fee rate of \$153 every six months. Total costs for multiple consignment authority consist of direct, indirect and supplier costs. The fees outlined below represent a doubling of the previous multiple use permit fees, plus indexation. The balance of the costs, including additional costs incurred for complex permit applications, will be met by Government.

Table 3.2 – Cost and fees for multiple consignment authority (six month periods)

Permit length				Direct cost	Indirect cost	Supplier cost	Total cost	New fee	Fee point – Multiple consignment authority
Initial application)	6 months	(permit		\$145.42	\$47.42	\$6.13	\$198.97	\$153	Fee paid upon application
Each additional 6 months of permit duration (beyond initial 6 months)				\$118.50	\$36.66	\$0	\$155.16 *	\$153*	Cumulative fee (based on permit duration) paid upon application

**Where a permit holder submits three SERs per six month period, the ongoing administration cost component is almost fully recovered. However, if a person submits more than three SERs per six month period the ongoing administration cost to the department would outweigh the fee paid with each additional SER beyond the third. For example, five SERs submitted in a six month permit period would cost the department \$255 to process (five SERs at \$51 each), but the fee paid would remain at \$153.*

Table 3.3 – Fee summary for multiple consignment authority

		Duration of the multiple consignment authority					
		6 months	1 year	18 months	2 years	30 months	3 years
Fee Components	Application Fee	\$153	\$153	\$153	\$153	\$153	\$153
	Additional fee per 6 months	\$0	\$153	\$306	\$459	\$612	\$765
Total permit fee		\$153	\$306	\$459	\$612	\$765	\$918

Testing permits

Testing permits allow the importation of specimens into quarantine-approved facilities for conducting tests to assess potential impacts of the species on the Australian environment. A testing permit is only issued if it can be demonstrated that the information cannot be obtained without conducting the tests in Australia. A multiple use testing permit will allow multiple consignments of the species to be imported for testing over a period of six months.

A separate application to amend the live import list, and a report addressing the standard terms of reference, must be submitted for each proposed species before a testing permit can be issued. The cost of amending the live import list is not considered to be appropriate for cost recovery because of free-rider effects, and is not included in the costs for testing permits outlined below.

Applicants also need an import permit from the Department of Agriculture, Fisheries and Forestry prior to bringing the species into Australia. The costs of any additional import permits issued by the Department of Agriculture, Fisheries and Forestry are also not considered here, as these services are not provided by this department.

Activities and costs involved in assessing a testing permit application

A testing permit is estimated to take a minimum of one hour of staff time to assess and process. This includes a proportionate contribution from a permit officer (68%), senior permit officer (16%), and permit team manager (16%). The total cost of a testing permit includes direct costs, indirect costs and supplier costs. Executive oversight costs of a section manager are not included in the cost of the service. An outline of how permits are processed and approved is at Figure 2.1 and Table 2.1.

Additional time may be required to assess the application depending on the complexity of the permit application. Complexity is primarily driven by the information available about the species, the biological control mechanisms within the quarantine facility, and the tests that will be undertaken (to demonstrate that the testing can only be performed in Australia).

The cost of assessing the testing permit application is still incurred, regardless of the outcome of the application assessment (that is, if the permit is issued or refused), because the same regulatory effort must be expended to make a legally valid decision.

The cost and fee summary for testing permits is represented in the table below. Testing permits are similar to multiple consignment authorities in that they allow multiple consignments to be imported over a six month period. As such, it is considered appropriate and equitable that the current fee of \$153 for a testing permit (which is the same as the new fee for a six month multiple consignment authority) to be retained at this time, and therefore no increase in the current fee will be introduced from July 2013, other than the increased costs associated with indexation.

The applicants for testing permits are typically government entities. Government entities are exempt from testing permit fees as outlined in the regulations. In the period from 2008-09 to 2011-12, there were no applications for testing permits from non-government entities.

Direct cost	Indirect cost	Supplier cost	Total cost	New fee	Fee point – Testing permits
\$145.42	\$47.42	\$6.13	\$198.97	\$153	The application fee must be paid at the time of making an application.

Facility assessments

Facility assessments are required where the department determines that an animal welfare assessment is required prior to issuing a permit for the live import/export of the species. A facility assessment involves the department evaluating information to determine whether a recipient institution is suitably equipped to manage, confine and care for the animal(s) to be imported or exported, including meeting their behavioural and biological needs. Where the receiving facility has been the subject of a facility assessment by the department for the same species within the last five years, a new facility assessment may not be required.

Activities and costs involved in facility assessments

It is estimated that one day of staff time is required to undertake a facility assessment. This includes a proportionate contribution from a senior permit officer (90%), and a permit team manager (10%). The total cost of a facility assessment permit includes direct costs and indirect costs. Executive oversight costs of a section manager are not included in the cost of the service. An outline of how permits are processed and approved is at Figure 2.1 and Table 2.1.

A facility assessment is only undertaken in conjunction with an application for a single use permit or multiple consignment authority. Costs for providing business system and legal services required for issuing permits are accounted for in the initial single use permit or multiple consignment authority application, and are not counted again in the total cost for undertaking the facility assessment.

The cost and fee summary for facility assessments is represented in the table below. The new fee for a facility assessment will be \$306 compared to the total cost of \$517.64. This represents a doubling of the previous facility assessment fee, plus indexation. The remainder of costs will be met by government.

Direct cost	Indirect cost	Supplier cost	Total cost	New fee	Fee point – Facility assessments
\$407.09	\$110.55	\$0	\$517.64	\$306	The facility assessment fee should be paid at the time of making a permit application based on the applicant's self-assessment to determine whether an assessment by the department is required.*

** If the fee is not paid at the time of making the associated permit application, and the department determines during the permit application assessment that a facility assessment is required, the statutory clock on the permit assessment will stop pending receipt of the payment and the information required to undertake the assessment.*

Permits for import and export of regulated domestic species (section 303FG 'import and export of household pets')

Note: Permits for the import and export of general household or domestic pets (e.g. for dogs and cats) are the responsibility of the Department of Agriculture, Fisheries and Forestry.

Under the EPBC Act, a limited number of native and exotic birds and domesticated rabbit species require household pet permits for non-commercial import or export. Exports and imports of live native wildlife and domestic rabbits as household pets regulated under the EPBC Act are currently limited to:

<i>Sulphur-crested Cockatoo</i>	<i>Little Corella</i>	<i>Cockatiel</i>
<i>Galah</i>	<i>Long-billed Corella</i>	<i>Budgerigar</i>
<i>Domesticated rabbits</i>		

Imports of these species can only occur if the bird or rabbit is imported directly from New Zealand. The application is assessed prior to the granting of the permit and considers specific legislative criteria including species eligibility, location, legal source, residency criteria, welfare, length of time, and evidence of pet ownership.

Activities and costs involved in assessing a permit application for the import/export of domesticated species (section 303 FG of the EPBC Act)

Household pet permit applications vary in complexity, however it is estimated that one day of staff time on average is required to undertake this assessment (similar to the cost and regulatory effort required for a facility assessment). This includes a proportionate contribution from a senior permit officer (90%), and a permit team manager (10%). The total cost of a household pet permit includes direct costs, indirect costs and supplier costs. Executive oversight costs of a section manager are not included in the cost of the service. An outline of how permits are processed and approved is at Figure 2.1 and Table 2.1.

The cost and fee summary for household pet permit applications is represented in the table below. The new fee for household pet permit applications will be \$306 of the total cost of \$656.08. This represents a doubling of the previous household pet permit fee, plus indexation. The balance of the costs will be met by government.

Direct cost	Indirect cost	Supplier cost	Total cost	New fee	Fee point – Household pet permits
\$505.51	\$144.44	\$6.13	\$656.08	\$306	The application fee must be paid at the time of making an application.

Personal baggage permits

Personal baggage permits are most commonly obtained by manufacturers and wholesalers of CITES-listed wildlife products to include with products at the point of sale. The possession of a personal baggage permit allows an individual to travel to a foreign country with the relevant product without concern that their goods will be seized by Australian border control personnel. Personal baggage permits are not applicable to items that are not personally accompanied (e.g. if the item is exported via mail or freight). In these instances, a valid single use permit is required.

Activities and costs involved in assessing personal baggage permits

Personal baggage permits are usually applied for in bulk, and take approximately 10 minutes per permit to process. This includes a proportionate contribution from a permit officer (90%), senior permit officer (5%), and permit team manager (5%). The total cost of a personal baggage

permit includes direct costs, indirect costs and supplier costs. Executive oversight costs of a section manager are not included in the cost of the service. An outline of how permits are processed and approved is at Figure 2.1 and Table 2.1.

The cost and fee summary for personal baggage permits is represented in the table below. Supplier costs are lower than for other permits because they are apportioned over the total number of bulk permits (approximately 14,500 annually). The new fee for personal baggage permit applications will be \$2 of the total cost of \$11.17 per permit. This represents a doubling of the previous personal baggage permit fee, plus indexation. The balance of the costs will be met by government.

Direct cost	Indirect cost	Supplier cost	Total cost	New fee	Fee point – Personal baggage permits
\$8.30	\$2.44	\$0.43	\$11.17	\$2	The application fee must be paid at the time of making an application.

Exceptional circumstances permits

The EPBC Act prescribes the circumstances in which the Minister can issue a permit. The EPBC Act provides that the Minister can issue a permit in exceptional circumstances where:

- the applicant fails to meet prescribed conditions in the legislation;
- the export or import would not be contrary to the legislation; and
- the export or import of the specimen would not be contrary to CITES requirements.

In approving the issue of exceptional circumstances permits, the Minister must be satisfied that the export or import would neither adversely affect biodiversity, nor be contrary to the objects of the relevant part of the EPBC Act. The circumstances that justify the issue of exceptional circumstances permits must not be merely used to evade compliance with relevant legislative requirements. The Minister must also undertake public consultation on the proposal to issue exceptional circumstances permit before making a final decision.

Activities and costs involved in assessing an exceptional circumstances permit application

Exceptional circumstances permit applications vary in complexity, however the process for establishing whether exceptional circumstances exist; and the work required by the department is consistently longer than for a single use permit for example. A significant amount of dialogue with the applicant is always required to establish that exceptional circumstances exist. Further, these permits take longer than other, simpler permit processes due to additional requirements for public comment and analysis of comments received. It is estimated to take approximately one day per permit to complete the process.

An exceptional circumstances permit includes a proportionate contribution from a senior permit officer (90%), and a permit team manager (10%). The total cost of an exceptional circumstances permit includes direct, indirect and supplier costs. Executive oversight costs of a section manager are not included in the cost of the service. An outline of how permits are processed and approved is at Figure 2.1 and Table 2.1.

The cost and fee summary for exceptional circumstances permit applications is represented in the table below. The new fee for exceptional circumstances permit applications will be \$306 of the total cost of \$656.08. This represents a doubling of the previous exceptional circumstances permit fee, plus indexation. The balance of the costs will be met by government.

Direct cost	Indirect cost	Supplier cost	Total cost	New fee	Fee point – Exceptional circumstances permits
\$505.51	\$144.44	\$6.13	\$656.08	\$306	The application fee must be paid at the time of making an application.

Summary of wildlife trade fees

Table 3.4 - Summary of wildlife trade fees

Regulatory Activity	Current Fee	New Fee (2013-14)
Single use permits	\$30	\$61
Multiple consignment authority	\$75 per six months	\$153 per six months
Testing permits	\$150	\$153
Facility assessment	\$150	\$306
Import/export of regulated species (s303 FG) – Household pet permits	\$150	\$306
Personal baggage permits	\$1	\$2
Exceptional circumstances permits	\$150	\$306

Table 3.5 – Summary of fee rates for the CRIS period*

Regulatory Activity	2013-14	2014-15	2015-16	2016-17	2017-18
Single use permits	\$61	\$63	\$64	\$65	\$66
Multiple consignment authority (per 6 months)	\$153	\$156	\$159	\$163	\$166
Facility assessment	\$306	\$313	\$319	\$325	\$332
Import/Export of domesticated species (section 303 FG) - Household pet permits	\$306	\$313	\$319	\$325	\$332
Personal baggage permits (per permit)	\$2	\$2	\$2	\$2	\$2
Testing permits	\$153	\$156	\$159	\$163	\$166
Exceptional circumstances permits	\$306	\$313	\$319	\$325	\$332

Indexation rate applied

2.1%

2.0%

2.0%

2.0%

**Fees in Table 3.5 have been rounded to the nearest dollar for practical charging purposes. Refer to Appendix A for unrounded fee calculations.*

3.3 Changes in cost base

Fees are set at a level lower than the costs incurred by the department to deliver wildlife trade permit services. Fees set out in the EPBC regulations will be indexed on 1 July each year to maintain the proportion of fee revenue relative to the department's costs.

3.4 Volume and/or demand assumptions

Historical demand

The permit volumes for 2010-11 and 2011-12 (the two most recent financial years with complete data available) are outlined in Table 3.6. Permit applications have remained at similar volumes for almost all permits in these years. The department received an increase in applications for single use permits in 2011-12 when compared to 2010-11. The increase is considered to be within the range of normal fluctuation. Departmental staff noted that 2010-11 single use permits volumes were slightly lower than normal, and 2011-12 volumes slightly higher. Tables 3.8 and 3.9 demonstrate the historic volume, revenue and expenses for 2010-11 and 2011-12 permit activities respectively.

Table 3.6 – Historical permit application volume (2010-11 and 2011-12)

Regulatory Activity	2010-11			2011-12			Average volume (2010-11 and 2011-12)		
	<i>Total</i>	<i>Exempt</i>	<i>Subject to fees</i>	<i>Total</i>	<i>Exempt</i>	<i>Subject to fees</i>	<i>Total</i>	<i>Exempt</i>	<i>Subject to fees</i>
Single use permits	973	251	722	1475	105	1370	1224	178	1046
Multiple use (6 month)	382	19	363	403	7	396	393	13	380
Multiple use (12 month)	59	16	43	46	13	33	53	15	38
Multiple use (18 month)	2	0	2	1	0	1	2	0	2
Multiple use (24 month)	3	0	3	3	1	2	3	1	2
Multiple use (30 month)	0	0	0	4	0	4	2	0	2
Multiple use (36 month)	28	8	20	23	8	15	26	8	18
Facility assessment	36	14	22	46	23	23	41	19	22
Household pet permits	27	0	27	30	0	30	29	0	29
Personal baggage permits	15324	0	15324	13529	0	13529	14427	0	14427
Testing permits	15	15	0	11	11	0	13	13	0
Exceptional circumstances permits	8	1	7	23	1	22	16	1	15
	16857	324	16533	15594	169	15425	16226	249	15977

Projected demand

Future demand has been projected to be similar to the average of 2010-11 and 2011-12 volume of activities. Table 3.7 below provides a summary of the methodology used for calculating the projected expenses, revenue and outstanding balance for forward years (using 2014-15 as an example). Table 3.10 provides a summary of the 2013-14 projected volume of activities, fees, expenses and revenue in detail for each individual permit type.

Table 3.7 – Methodology used for calculating project expenses, revenue, and balance (2014-15 example)

Total permit expenses	(Direct expenses) + (indirect expenses) + (supplier expenses)
<i>Direct expenses</i>	<i>(2013-14 permit activity costs x indexation rate) x (permit volume)</i>
<i>Indirect expenses</i>	<i>(2013-14 permit activity costs x indexation rate) x (permit volume)</i>
<i>Supplier expenses</i>	<i>(2013-14 permit activity costs x indexation rate) x (permit volume)</i>
Total revenue	(2014-15 permit fee amounts) X (permit volume)
<i>Step 1</i>	<i>(2013-14 unrounded fee amounts x indexation rate) = new unrounded permit fee amounts for 2014-15</i>
<i>Step 2</i>	<i>Round 2014-15 unrounded fee amount to the nearest dollar = 2014-15 permit fee (Refer appendix A)</i>
Balance	(Total revenue) – (Total permit expenses)

The summary of projected expenses (direct, indirect and supplier), revenue and balance for the five year CRIS period is provided in Table 3.11. 2013-14 has been used as the baseline year for the introduction of new fees, with indexation rates applied from 1 July each year relative to the previous year. The same rate of indexation has been applied to the fees and departmental expenses (refer to Appendix A for indexed fee rate calculations and rounded fee rates).

Table 3.8 – 2010-11 historic permit application volume, revenue and expenses

Permit type	Fee	Permit Volume			Revenue	Expenses					Balance
		Permit applications	Fee exemptions	Volume (Cost recovered)		Direct	Indirect	Supplier	Individual Permit Cost	Total Permit Costs	
a) Single use permits	\$30	973	251	722		\$142.43	\$46.44	\$6.00	\$194.87		
b) Rev/Expense totals					\$21,660	\$138,584.39	\$45,186.12	\$5,838.00		\$189,608.51	-\$167,949
a) MUP (6 month)	\$75	382	19	363	\$27,225	\$142.43	\$46.44	\$6.00	\$194.87	\$74,440.34	-\$47,215
a) MUP (12 month)	\$150	59	16	43	\$6,450	\$258.49	\$82.35	\$6.00	\$346.84	\$20,463.56	-\$14,014
a) MUP (18 month)	\$225	2	0	2	\$450	\$374.55	\$118.26	\$6.00	\$498.81	\$997.62	-\$548
a) MUP (24 month)	\$300	3	0	3	\$900	\$490.61	\$154.17	\$6.00	\$650.78	\$1,952.34	-\$1,052
a) MUP (30 month)	\$375	0	0	0	\$0	\$606.67	\$190.08	\$6.00	\$802.75	\$0.00	\$0
a) MUP (36 month)	\$450	28	8	20	\$9,000	\$722.73	\$225.99	\$6.00	\$954.72	\$26,732.16	-\$17,732
b) Rev/Expense totals	Variable	474	43	431	\$44,025	\$92,116.54	\$29,625.48	\$2,844.00		\$124,586.02	-\$80,561
a) Facility assessment	\$150	36	14	22		\$398.72	\$108.28	\$0.00	\$507.00		
b) Rev/Expense totals					\$3,300	\$14,353.92	\$3,898.08	\$0.00		\$18,252.00	-\$14,952
a) Household pet permits	\$150	27	0	27		\$495.11	\$141.47	\$6.00	\$642.58		
b) Rev/Expense totals					\$4,050	\$13,367.97	\$3,819.69	\$162.00		\$17,349.66	-\$13,300
a) Personal baggage permits	\$1	15324	0	15324		\$8.13	\$2.39	\$0.42	\$10.94		
b) Rev/Expense totals					\$15,324	\$124,584.12	\$36,624.36	\$6,436.08		\$167,644.56	-\$152,321

a) Testing permits	\$150	15	15	0		\$142.43	\$46.44	\$6.00	\$194.87	
b) Rev/Expense totals					\$0	\$2,136.45	\$696.60	\$90.00	\$2,923.05	-\$2,923
a) Exceptional circumstances permits	\$150	8	1	7		\$495.11	\$141.47	\$6.00	\$642.58	
b) Rev/Expense totals					\$1,050	\$3,960.88	\$1,131.76	\$48.00	\$5,140.64	-\$4,091
		16857	324	16533	\$89,409	\$389,104	\$120,982	\$15,418	\$525,504	-\$436,095

Table note: Line A: Individual permit fees, costs, and volume of permits issued (taking into account permit fee exemptions).

Line B: Individual permit revenue, individual permit expenses, balance of unrecovered costs.

MUP = Multiple Use Permit (Now known as Multiple Consignment Authority)

Table 3.9 – 2011-12 historic permit application volume, revenue and expenses

Permit type	Fee	Permit Volume			Revenue	Expenses					Balance
		Permit applications	Fee exemptions	Volume (Cost recovered)		Direct	Indirect	Supplier	Individual Permit Cost	Total Permit Costs	
a) Single use permits	\$30	1475	105	1370		\$142.43	\$46.44	\$6.00	\$194.87		
b) Rev/Expense totals					\$41,100	\$210,084.25	\$68,499.00	\$8,850.00		\$287,433.25	-\$246,333
a) MUP (6 month)	\$75	403	7	396	\$29,700	\$142.43	\$46.44	\$6.00	\$194.87	\$78,532.61	-\$48,833
a) MUP (12 month)	\$150	46	13	33	\$4,950	\$258.49	\$82.35	\$6.00	\$346.84	\$15,954.64	-\$11,005
a) MUP (18 month)	\$225	1	0	1	\$225	\$374.55	\$118.26	\$6.00	\$498.81	\$498.81	-\$274

a) MUP (24 month)	\$300	3	1	2	\$600	\$490.61	\$154.17	\$6.00	\$650.78	\$1,952.34	-\$1,352
a) MUP (30 month)	\$375	4	0	4	\$1,500	\$606.67	\$190.08	\$6.00	\$802.75	\$3,211.00	-\$1,711
a) MUP (36 month)	\$450	23	8	15	\$6,750	\$722.73	\$225.99	\$6.00	\$954.72	\$21,958.56	-\$15,209
b) Rev/Expense totals	Variable	480	29	451	\$43,725	\$90,185.68	\$29,042.28	\$2,880.00		\$122,107.96	-\$78,383
a) Facility assessment	\$150	46	23	23		\$398.72	\$108.28	\$0.00	\$507.00		
b) Rev/Expense totals					\$3,450	\$18,341.12	\$4,980.88	\$0.00		\$23,322.00	-\$19,872
a) Household pet permits	\$150	30	0	30		\$495.11	\$141.47	\$6.00	\$642.58		
b) Rev/Expense totals					\$4,500	\$14,853.30	\$4,244.10	\$180.00		\$19,277.40	-\$14,777
a) Personal baggage permits	\$1	13529	0	13529		\$8.13	\$2.39	\$0.42	\$10.94		
b) Rev/Expense totals					\$13,529	\$109,990.77	\$32,334.31	\$5,682.18		\$148,007.26	-\$134,478
a) Testing permits	\$150	11	11	0		\$142.43	\$46.44	\$6.00	\$194.87		
b) Rev/Expense totals					\$0	\$1,566.73	\$510.84	\$66.00		\$2,143.57	-\$2,144
a) Exceptional circumstances permits	\$150	23	1	22		\$495.11	\$141.47	\$6.00	\$642.58		
b) Rev/Expense totals					\$3,300	\$11,387.53	\$3,253.81	\$138.00		\$14,779.34	-\$11,479
		15594	169	15425	\$109,604	\$456,409	\$142,865	\$17,796		\$617,071	-\$507,467

Table note: Line A: Individual permit fees, costs, and volume of permits issued (taking into account permit fee exemptions).

Line B: Individual permit revenue, individual permit expenses, balance of unrecovered costs.

MUP = Multiple use permit (Now known as Multiple Consignment Authority)

Table 3.10 – 2013-14 projected permit volume, revenue and expenses

Permit type	Fee	Permit Volume			Revenue	Expenses					Balance
		Permit applications	Fee exemptions	Volume (Cost recovered)		Individual				Total Permit Costs	
						Direct	Indirect	Supplier	Permit Cost		
a) Single use permits	\$61	1224	178	1046		\$145.42	\$47.42	\$6.13	\$198.97		
b) Rev/Expense totals					\$63,806	\$177,994.08	\$58,042.08	\$7,503.12		\$243,539.28	-\$179,733
a) MCA (6 month)	\$153	393	13	380	\$58,140	\$145.42	\$47.42	\$6.13	\$198.97	\$78,195.21	-\$20,055
a) MCA (12 month)	\$306	53	15	38	\$11,628	\$263.92	\$84.08	\$6.13	\$354.13	\$18,768.89	-\$7,129
a) MCA (18 month)	\$459	2	0	2	\$918	\$382.42	\$120.74	\$6.13	\$509.29	\$1,018.58	-\$100
a) MCA (24 month)	\$612	3	1	2	\$1,224	\$500.92	\$157.40	\$6.13	\$664.45	\$1,993.35	-\$768
a) MCA (30 month)	\$765	2	0	2	\$1,530	\$619.42	\$194.06	\$6.13	\$819.61	\$1,639.22	-\$108
a) MCA (36 month)	\$918	26	8	18	\$16,524	\$737.92	\$230.72	\$6.13	\$974.77	\$25,344.02	-\$8,804
b) Rev/Expense totals	Variable	479	37	442	\$89,964	\$93,830.18	\$30,192.82	\$2,936.27		\$126,959.27	-\$36,995
a) Facility assessment	\$306	41	19	22		\$407.09	\$110.55	\$0.00	\$517.64		
b) Rev/Expense totals					\$6,732	\$16,690.69	\$4,532.55	\$0.00		\$21,223.24	-\$14,491
a) Household pet permits	\$306	29	0	29		\$505.51	\$144.44	\$6.13	\$656.08	-	
b) Rev/Expense totals					\$8,874	\$14,659.79	\$4,188.76	\$177.77		\$19,026.32	-\$10,152
a) Personal baggage permits	\$2	14427	0	14427		\$8.30	\$2.44	\$0.43	\$11.17		
b) Rev/Expense totals					\$28,854	\$119,744.10	\$35,201.88	\$6,203.61		\$161,149.59	-\$132,296

a) Testing permits	\$153	13	13	0		\$145.42	\$47.42	\$6.13	\$198.97	
b) Rev/Expense totals					\$0	\$1,890.46	\$616.46	\$79.69	\$2,586.61	-\$2,587
a) Exceptional circumstances permits	\$306	16	1	15		\$505.51	\$144.44	\$6.13	\$656.08	
b) Rev/Expense totals					\$4,590	\$8,088.16	\$2,311.04	\$98.08	\$10,497.28	-\$5,907
		16229	248	15981	\$202,820	\$432,897	\$135,086	\$16,999	\$584,982	-\$382,162

Table note: Line A: Individual permit fees, costs, and volume of permits issued (taking into account permit fee exemptions).

Line B: Individual permit revenue, individual permit expenses, balance of unrecovered costs.

MCA = Multiple Consignment Authority (formerly Multiple Use Permit)

Table 3.11 – Projected volume / demand (2013-14 – 2017-18)

	2013-14	2014-15	2015-16	2016-17	2017-18
Total permit expenses	\$584,982	\$597,267	\$609,216	\$621,403	\$633,833
<i>Direct expenses</i>	<i>\$432,897</i>	<i>\$441,987</i>	<i>\$450,827</i>	<i>\$459,844</i>	<i>\$469,042</i>
<i>Indirect expenses</i>	<i>\$135,086</i>	<i>\$137,924</i>	<i>\$140,684</i>	<i>\$143,498</i>	<i>\$146,369</i>
<i>Supplier expenses</i>	<i>\$16,999</i>	<i>\$17,356</i>	<i>\$17,706</i>	<i>\$18,061</i>	<i>\$18,422</i>
Total cost recovery revenue	\$202,820	\$207,138	\$210,344	\$216,602	\$220,859
Balance	-\$382,162	-\$390,129	-\$398,872	-\$404,801	-\$412,974
<i>Indexation rate applied</i>		<i>2.1%</i>	<i>2.0%</i>	<i>2.0%</i>	<i>2.0%</i>

3.5 Fee exemptions

Exemptions

Existing fee exemptions will continue to apply for wildlife trade permits as already prescribed in section 18.04 of the EPBC regulations. The costs for wildlife trade exemptions are fully met by government.

Exemptions from permit fees apply where:

- The applicant is the Commonwealth, a Commonwealth agency, a state or territory government or an authority or agency of a state or territory, and the activity to be carried out is primarily for a non-commercial purpose;
- The applicant is an overseas CITES authority, and has agreed to accept seized wildlife specimens for repatriation;
- The applicant is a traditional owner of the Indigenous people's land where the activity is to be undertaken (excludes business entities that are not under the direct control of the applicant).

Permits sought by government entities are typically exempt from fees as they are consistent with the EPBC Act's policy objectives. In the three years from 2008-09 to 2010-11, 512 fee exemptions were issued for government agencies. These fee exemptions related to exhibitions (including travelling exhibitions), conservation breeding, research, testing and one instance of exceptional circumstances.

Any repatriation of CITES products is also consistent with the EPBC Act's policy objectives, and the department intends to retain this fee exemption.

4 ONGOING MONITORING

4.1 Monitoring mechanisms

Cost recovery revenue from multiple consignment authorities will be reported in the department's Annual Report in accordance with the Finance Minister's Orders. Internally, the department monitors this program on a monthly basis through management reporting and analysis.

4.2 Stakeholder consultation

As noted in Section 1.2, the wildlife trade permit cost recovery arrangements have undergone consultation as part of the EPBC Act cost recovery consultation process:

September 2011: a consultation paper was released by the department on cost recovery arrangements under the EPBC Act seeking stakeholder input. The public consultation period closed on 31 October 2011.

May 2012: a draft EPBC Act cost recovery impact statement was released for six weeks public consultation. The draft EPBC Act cost recovery impact statement outlined in more detail the proposed new fees for wildlife trade cost recovery, as well as new cost recovery for environmental assessments.

Please refer to Section 1.2 and Section 2 for more detail of how feedback from the consultation informed the development of this CRIS.

Stakeholders can access the above consultation documents at the links provided in Section 6: Cost Recovery links below.

4.3 Periodic review

Cost recovery arrangements are subject to periodic review no less frequently than every five years, in accordance with the Cost Recovery Guidelines.


The next scheduled review, in 2017-18, will:

- measure efficiencies to the system that have been gained by the reform of the EPBC Act, including updates to business systems and online permit services;
- review the costs of providing regulatory services;
- re-assess the efficiency, cost effectiveness and appropriateness of cost recovery; and
- re-evaluate whether fees, or administrative aspects of cost recovery, require amendment.

Any material amendments to the cost recovery arrangements that occur prior to the next scheduled periodic review may require preparation of a new or amended CRIS.

5 CERTIFICATION

I certify that this Cost Recovery Impact Statement complies with the Australian Government Cost Recovery Guidelines.


.....

Secretary - Dr Paul Grimes

Department of Sustainability, Environment, Water, Population and Communities

Date of Certification: 27 May 2013.....

6 COST RECOVERY LINKS

Cost Recovery Guidelines

The Australian Government Cost Recovery Guidelines and the accompanying Finance Circular can be found at:

<http://www.finance.gov.au/financial-framework/financial-management-policy-guidance/cost-recovery.html>

2011: Consultation Paper on Cost Recovery under the EPBC Act

The EPBC Act cost recovery consultation paper can be found at:

<http://www.environment.gov.au/epbc/publications/consultation-draft-cost-recovery-2011.html>

2012: Draft EPBC Act cost recovery impact statement

The draft EPBC Act cost recovery impact statement can be found at:

<http://www.environment.gov.au/epbc/publications/consultation-draft-cost-recovery.html>

Appendix A: Fee schedule for forward years (set fees and fee calculations)

Regulatory Activity	(Historic)	2013-14		2014-15		2015-16		2016-17		2017-18	
	Set fee	Indexed fee	Set fee (rounded)	Indexed fee	Set fee (rounded)	Indexed fee	Set fee (rounded)	Indexed fee	Set fee (rounded)	Indexed fee	Set fee (rounded)
Single use permits	\$30	\$61.26	\$61	\$62.55	\$63	\$63.80	\$64	\$65.07	\$65	\$66.37	\$66
MCA: 6 month (1 x 6 month fee)	\$75	\$153.15	\$153	\$156.37	\$156	\$159.49	\$159	\$162.68	\$163	\$165.94	\$166
MCA: 12 month (2 x 6 month fee)	\$150		\$306		\$312		\$318		\$326		\$332
MCA: 18 month (3 x 6 month fee)	\$225		\$459		\$468		\$477		\$489		\$498
MCA: 24 month (4 x 6 month fee)	\$300		\$612		\$624		\$636		\$652		\$664
MCA: 30 month (5 x 6 month fee)	\$375		\$765		\$780		\$795		\$815		\$830
MCA: 36 month (6 x 6 month fee)	\$450		\$918		\$936		\$954		\$978		\$996
Facility assessment	\$150	\$306.30	\$306	\$312.73	\$313	\$318.99	\$319	\$325.37	\$325	\$331.87	\$332
Import/Export of domesticated species (section 303 FG) - Household pet permits	\$150	\$306.30	\$306	\$312.73	\$313	\$318.99	\$319	\$325.37	\$325	\$331.87	\$332
Personal baggage permits (per permit)	\$1	\$2.04	\$2	\$2.08	\$2	\$2.13	\$2	\$2.17	\$2	\$2.21	\$2
Testing permits	\$150	\$153.15	\$153	\$156.37	\$156	\$159.49	\$159	\$162.68	\$163	\$165.94	\$166
Exceptional circumstances permits	\$150	\$306.30	\$306	\$312.73	\$313	\$318.99	\$319	\$325.37	\$325	\$331.87	\$332
Indexation rate applied for forward years				2.1%		2.0%		2.0%		2.0%	

Table note: MCA = Multiple Consignment Authority (formerly Multiple Use Permit)

Fees in this table that are chargeable under regulation are show rounded to the nearest dollar.