



Department of Agriculture and Water Resources.

Food Importer Research.

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1. Executive summary

1.1. Introduction

The Department of Agriculture and Water Resources (the Department) has powers under the *Imported Food Control Act 1992* to operate a food safety inspection program known as the Imported Food Inspection Scheme (IFIS). The IFIS allows the Department to monitor food compliance with the Australian New Zealand Food Standards Code (the Food Standards Code), and involves risk-based monitoring of imported food upon its arrival at Australia's borders. In the 1 January to 30 June 2015 period, over 13,000 lines of imported food were inspected under the IFIS.

The Department is currently developing a program of proposed reforms to the management of imported food, with the ultimate goal of providing greater assurance to the public that imported food is safe through the implementation of a range of legislative and non-legislative measures. These proposed reforms require the development of a Regulation Impact Statement (RIS) to assess the costs and benefits of each proposed measure.

1.2. Objectives of the research

The objectives of the research project were to:

- ▶ Establish a database of food importer information that enables segmentation by specific criteria such as demographics, size/turnover, food types, source countries, use of food safety systems or other systems for compliance, costs of compliance, and state or territory food business registration/licence;
- ▶ Provide a summary report of the research analysis including food importer segmentation, national footprint, costs of compliance, extent of food safety systems, and key statistical conclusions and relevance;
- ▶ Obtain sufficient information regarding the type and level of involvement of importers in the food recall process, their ability to trace imported food back one step to the supplier and forward one step to the customer, and how food importers understand and meet their food recall obligations; and
- ▶ Understand importer consideration of, and interest in, entering into a Food Import Compliance Agreement (FICA) with the Department, and the perceived barriers and benefits of doing so.

1.3. Methodology

Following a scoping session with the Department, Colmar Brunton developed the draft questionnaire. To ensure the survey was asking questions of food importers that were both relevant and asked in an appropriate context, the Department circulated the draft questionnaire within the Department's Imported Food Consultative Committee (comprising a range of members, including food importers, nationally) for feedback. This feedback was received and reflected in a revised draft survey instrument.

A series of nine cognitive interviews were conducted from 6 – 9 April 2016 with food importers ranging from small importers (one to two consignments per annum) through to very large food importers (thousands of consignments imported per annum). Feedback obtained through these interviews was used in further refining the questionnaire, with the Department subsequently approving the final survey instrument in light of these findings.

Due to a limitation of the Department's statutory authority to use and disclose collected information, administrative data relating to food importations as collected by the Department of Immigration and Border Protection was not able to be used in undertaking the survey. In the absence of any alternate list of those importing food into Australia, the online survey had to be conducted on a self-select basis.

The online self-select¹ survey was promoted via a number of channels (including government websites, the Department's Import Clearance Advice Notice, Integrated Cargo System Notices, and Imported Food Industry Advice Notices), in partnership with key industry consultation and stakeholder groups and via the Department's social media channels.

The survey was undertaken from 18 April 2016 to 3 May 2016 and a total of 41 surveys were completed during this period.

The final questionnaire can be found in Appendix B: Questionnaire.

This report presents the results from the survey. Given the very small number of completed surveys achieved, these findings should be viewed as representative of the experiences of this small number of respondents only.

Given the small number of respondents, minor additional analysis of findings by demographic factors has been possible for only some questions. Other results are presented at the overall sample level only.

1.4. Key findings

1.4.1. Lack of robust sampling frame poses a key challenge for meaningful engagement with food importers

While the Department developed a detailed promotion strategy to encourage food importers to engage and complete the survey, the fact that only 41 food importers responded is clearly disappointing and does not provide for the development of the food importers database originally

¹ Given the self-select nature of the survey and the small number of respondents, it must be noted that the findings should only be read as indicative of the broader sector, as opposed to being representative of all Australian food importers.

envisioned. In survey topics where there is not a clear and tangible direct benefit for the participant, the willingness of people to give of their time – when under time pressures within their respective roles – can prove problematic.

The original plan for the survey included using importer contact details collected by the Department of Immigration and Border Protection for imported food activities; however, legal advice deemed this was not possible due to limited statutory authority to use and disclose this information. This sample frame would have provided access to multiple thousands of food importers, proving significantly greater scope for (although not guaranteeing) a higher number of food importers responding to the survey.

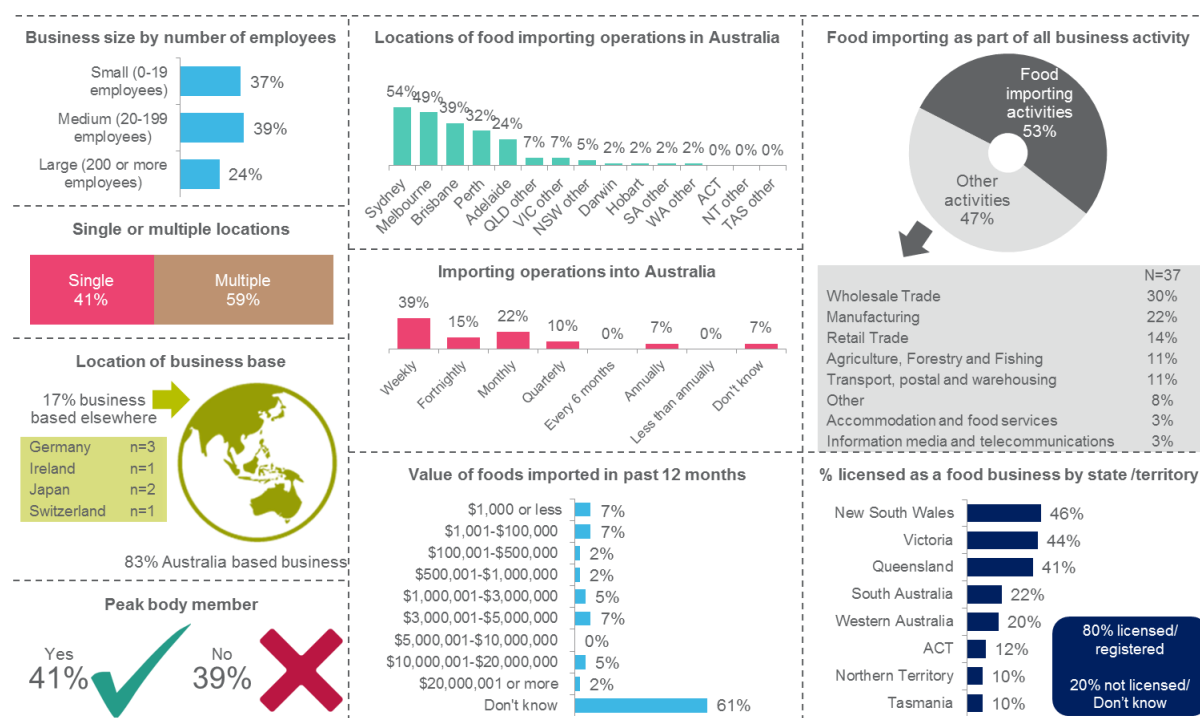
Respondents from a mixture of business sizes were surveyed, with 37% from small businesses (0-19 employees), 39% from medium-sized businesses (20-199 employees) and 24% from large businesses (200 or more employees). The majority (83%) of respondents were from Australian-based businesses, with the bulk of food importing operations in NSW (56% with operations in this state), Victoria (54%) and Queensland (44%). A total of 80% of respondents' businesses were licensed and/or registered as a food business with a state or federal authority or council.

Also part of the survey, respondents were asked if they would like to provide their details to the Department, to potentially be invited to participate in further consultation or research about food importer requirements. A total of 33 respondents provided their names, contact phone number and email addresses to participate in any possible follow-up activity.

1.4.2. Sample profile

The following figure provides an overview of the 41 respondents to the survey.

Figure 1. Sample profile



1.4.3. Types of food imported in the past three years

Section A of the questionnaire was designed to capture demographic information from the sample, and responses from this section can be found at Appendix A.

Respondents were asked what types of foods they had imported over the past three years. A broad range of food types were identified, with the most common being dairy (46% dairy products), spices and condiments (41%), vegetables (41%), seafood (39%), fruits (37%) and sauces (32%).

1.4.4. Importation of high-risk food

Respondents were asked about importation of foodstuffs that present a higher risk of food safety issues. Between 2% (1 respondent) and 12% (5 respondents) indicated they had imported these respective food types in the past three years. Given the small sample sizes, there were no discernible patterns of those more or less likely to be importing such foods, with these importers ranging from smaller to larger businesses by employee numbers.

Table 1: Types of high-risk food imported

	%	n
Beef and beef products	7%	3
Raw pork	5%	2
Raw or frozen bivalve molluscs	10%	4
Ready-to-eat minimally processed finfish	12%	5
Raw milk cheese	10%	4
Raw ready-to-eat fresh or frozen vegetables	5%	2
Raw ready-to-eat fresh or frozen fruit	10%	4
Raw ready-to-eat nuts	10%	4
Semi-dried tomatoes	2%	1

QB2A. Has your business imported any of the following higher risk food types in the past three years (1 April 2013 – 31 March 2016)? Base: All respondents (n=41)

1.4.5. Frequency, quantity & value of food imports into Australia

Respondents were asked to indicate the frequency of their food importing activity. The most common response was 'weekly' (39%), followed by 'monthly' (22%) or 'fortnightly' (15%). Businesses where food importing made a large proportion of their business (e.g. 70%+) were more likely to be importing on a more regular basis, as were medium and larger businesses (those employing 20 or more staff).

Respondents were asked approximately how many consignments of food their business imported over the 12 months to 31 March 2016. Close to a third of respondents indicated they didn't know how many consignments had been imported (32%), while 20% said they imported 20 or fewer consignments over this period. Just 5% of respondents indicated they imported more than 2000 consignments over this period. Those businesses employing 20-199 employees were observed to be most commonly importing between 200 and 1000 consignments a year, while respondents from larger companies (200+ employees) were largely unable to put a specific number on the volume of consignments.

Around three in five respondents (61%) were unable to put an approximate Australian dollar value of their total imports for the 12 months ending 31 March 2016. There were no clear relationships between business size and dollar values of goods imported.

1.4.6. Time taken to ensure imports comply with the Food Standards Code

One of the aims of the survey was to explore the impact of the current food safety legislation on those importing food into Australia. To this end, respondents were asked the average number of hours per week it took their business to ensure food imported into Australia was compliant with the Food Standards Code and related food legislation (including any hours attributed to customs brokers and any other consultants/experts).

Average weekly hours reported varied from zero (one respondent) to 200 hours (one respondent). An average weekly time of one hour was the most common response (6 respondents), followed by 20 hours (3 respondents). Across those able to give an estimated number of hours per week, the average time taken was 21 hours per week, while the median was 8 hours per week. When looked at by business size, responses across the groups followed a similar pattern with the majority in the 0-20 hour per week range. The highest estimate given (200 hours) was by a respondent from a large business (200 or more employees).

In addition to asking for this estimate of average hours, respondents were asked what proportion of these average hours per week were undertaken by staff at a range of levels. Management and administrative staff had the highest average 'share' of this workload at 34% and 28% respectively.

1.4.7. Overall knowledge of imported food legislation

Respondents were asked to rate their company's overall knowledge of the Food Standards Code and imported food legislation on a scale of 0 to 10, where 0 was 'No knowledge at all' and 10 was 'Very knowledgeable'.

Overall, respondents rated their company's knowledge of the code and imported food legislation quite highly, with 61% providing a rating of 9 or higher out of 10. Encouragingly, just 4% indicated a low level of knowledge in this regard. Larger businesses (those with 20-199 employees or 200+ employees) were generally more likely to self-assess their knowledge as higher than smaller businesses.

Respondents were also asked how confident they were in their company's ability to comply with the Food Standards Code and imported food legislation on a 0-10 scale, where 0 was 'Not at all confident' and 10 was 'Very confident'. Two thirds of respondents indicated they were 'very confident' in their company's ability to comply, while a further 24% said they were confident. No respondents indicated a lack of confidence in their company's ability to comply. Again, larger businesses were generally more likely to rate their confidence as very high.

1.4.8. Importance of information sources in helping to comply

Respondents were asked to rate the importance of a range of information sources in helping them meet their obligations under the Food Standards Code and imported food legislation. The Food Standards Australia New Zealand website was rated the most important source of information (mean rating of 7.5/10), followed by an Imported Food Notice (IFN) (7.0/10), Customs agents/brokers

(6.9/10) and the Department of Agriculture and Water Resources food inspection officers (6.6/10) and the Department of Agriculture and Water Resources website (6.3/10). Larger importing businesses (those with more than 200 employees) were generally more likely to rate both their internal legal team; their suppliers, manufacturers or producers; and peak bodies as important sources of information over smaller businesses.

In addition to asking about which information sources were most important, respondents were also asked which channels they would prefer to receive information about any changes to food importing regulations. The results were broadly similar to the previous question, with a Food Import Notice from the Department of Agriculture and Water Resources (71%), the Food Standards Australia New Zealand website (59%) and the Department of Agriculture & Water Resources website (59%) emerging as the most preferred channels overall. These findings were broadly consistent by size of the importing business.

1.4.9. Food Import Compliance Agreements

Respondents were asked if they had heard of a Food Import Compliance Agreement (FICA) prior to the survey. Some 41% of respondents said they had heard of a FICA previously, while 54% indicated they had not heard of such agreements prior to the survey. Larger businesses, businesses with their headquarters in Australia and those where food importing makes up a larger proportion of their overall business were generally more aware of FICAs than other groups.

Some 15% of survey respondents (6 businesses) indicated their business operates under a Food Import Compliance Agreement, 61% said they did not and a further 24% were unsure. Of the six businesses with a FICA, the majority of these were medium to large businesses (20-199 or 200+ employees), had headquarters in Australia and where food importing made up 70% or more of their overall business.

Those who indicated they were not currently operating under a FICA were asked what the main barriers were to them seeking a FICA for their food importing activities. The most common barrier identified was 'not knowing enough about what a FICA is and how they work' (24%), followed by the agreement being 'too expensive/not worth the implementation and/or maintenance cost' (12%). Some 16% could not identify any specific barriers to them seeking a FICA.

Currently, any food importing business entering into a FICA needs to ensure all foods they import meet the conditions of the agreement. Those currently without a FICA were asked if they would be more likely, less likely or equally as likely to apply for a FICA if their business could apply for part of its food importing activities to be covered only.

Some 28% of those without a FICA currently said they would be more likely to apply for a FICA if this change was made, 24% said they would be equally as likely, while just 4% said they would be less likely. Some 44% of respondents said they didn't know how such a change would affect their likelihood to apply for a FICA into the future, likely reflecting the limited awareness of FICAs overall and what value they could potentially provide for the business.

Those respondents who indicated they had a FICA in place were asked how long it took them (in hours) to originally establish the FICA within their business. Of the six respondents who indicated they had a FICA in place, the time taken to originally establish this ranged from 10 hours to 300 hours. As the total number of this particular group was very small, it is difficult to identify patterns; however

respondents from medium and large businesses reported slightly longer hours taken to establish the FICA.

These respondents were also asked what proportion of hours taken to initially establish the FICA was undertaken by staff at a range of levels. Internal specialist/experts had the highest average 'share' of this workload at 88%, suggesting this task commonly required the assignment of dedicated internal resources to establish.

Those with a FICA were asked to provide an estimate of the hours it takes their business to maintain the FICA on an annual basis. Of the four food importers able to provide such an estimate, average time ranged from 10 hours to 200 hours, while the other two said they didn't know. While the total number of this particular group was again too small to identify patterns, in this sample respondents from medium and large businesses recorded longer hours taken to maintain the FICA than those from smaller businesses.

These respondents were also asked what proportion of these hours to maintain the FICA annually was undertaken by staff at a range of levels. Internal specialist/experts had the highest average 'share' of this workload again at 52%.

1.4.10. Volume of IFIS inspections

Respondents not currently on a FICA were asked approximately how many consignments of imported food were subject to IFIS inspection over the 12 months to 31 March 2016. Numbers of consignments referred for IFIS inspection (only, e.g. without concurrent quarantine inspection) ranged from 0 to 200 consignments. Medium businesses (20-199 employees) more commonly said between 21 and 50 consignments were referred to IFIS inspection only over this period. Some 43% of respondents said they didn't know how many consignments had been referred.

Similarly, respondents were asked how many consignments had been referred to a joint IFIS and quarantine inspection in the 12 months to 31 March 2016. Numbers of consignments referred for joint IFIS and quarantine inspection only ranged from 0 to 400 consignments. Those businesses reporting higher volume of referrals were medium or larger sized businesses by employee numbers (and this is broadly consistent with these groups reporting higher volumes of consignments imported overall as reported above). Some 43% of respondents said they didn't know how many consignments had been referred for joint inspection.

1.4.11. Time taken to manage the IFIS inspection

In relation to the most recent consignment referred for IFIS inspection, respondents were asked to estimate the number of staff hours it took to manage this process. These estimates ranged from one hour through to 60 hours, while 57% did not know how many staff hours were required in managing this process. In this sample, respondents in small, medium and large businesses recorded a similar number of staff hours taken to manage the most recent IFIS inspection, with most falling into the 0-20 hours range. One respondent in a medium-sized business (20-199 employees) recorded the highest estimated hours (60 hours).

Time taken to manage IFIS inspection was also looked at by the number of consignments in the past 12 months subject to inspection. Unfortunately, many of the respondents indicated that they did not know the hours or consignment estimates. Most consignment quantities fell mostly within the 0-50 range, though as there are little data for the other groups a pattern cannot be ascertained.

Table 2: Time taken in hours to manage IFIS inspection for last consignment of food subject to inspection

Estimated hours to manage IFIS	<i>n</i>	%
1	6	17%
2	3	9%
4	1	3%
5	1	3%
6	1	3%
8	1	3%
16	1	3%
60	1	3%
Don't know	20	57%

QE3. For this most recent consignment of food subject to IFIS inspection, please indicate the estimated number of staff hours it took to manage the IFIS inspection process. Base: Those without a FICA (n=35)

These respondents were also asked what proportion of these hours to manage the latest consignment referred for IFIS inspection were undertaken by staff at a range of levels. Administration (37%) and management (28%) were the staff levels most commonly managing this process.

1.4.12. Delay at last IFIS inspection

To explore the impact of IFIS inspections on food importers, respondents were asked how long the most recent consignment of food referred for IFIS inspection was delayed at the point of entry (in hours). The delays caused ranged from 6 hours to 192 hours, with the most common delays cited being either 24 hours (11%) or 48 hours (11%). Some 51% of respondents asked this question didn't know how many hours the latest consignment referred for IFIS inspection was delayed. By business size, hours delayed were again fairly consistent across the groups, with the majority falling into the 21-50 hours range. Of note, the business reporting a 192 hour delay (8 days) was a small business (0-19 employees).

1.4.13. Number of suppliers

Respondents were asked how many individual suppliers they had sourced food to import from over the 12 months to 31 March 2016. These ranged from just one supplier through to 400 suppliers. Medium to larger sized businesses (20-199 and 200+ employees) were observed to indicate higher numbers of individual suppliers used over the past 12 months.

Table 3: Number of individual suppliers used in 12 months to 31 March 2016

Number of individual suppliers	%	N
1	10%	4
3	12%	5
5	5%	2
6	5%	2
18	2%	1
20	12%	5

30	5%	2
50	2%	1
55	2%	1
75	2%	1
150	2%	1
200	2%	1
250	2%	1
400	2%	1
Don't know	32%	13

QF0A. Approximately how many individual suppliers have you sourced food (to import) from over the past 12 months (1 April 2015 – 31 March 2016)? Base: All respondents (n=41)

1.4.14. Number of suppliers with safety management system certification

Across all respondents, 20 food importers were able to identify both how many individual suppliers they had used in the past 12 months, and how many of these that have specific food safety management certification (such as BRC global Standards, SQF, HACCP, ISO 9000, ISO 22000 etc.). The proportion of suppliers with food safety management certification ranged from 0% (albeit this was an importer sourcing food from one specific supplier who was not certified) through to 100%. Across this group, the average proportion of suppliers with food safety management certification was 89%., reflecting the fact that among both smaller and larger sized businesses most are sourcing food for import from suppliers with food safety management certification.

Table 4: Proportion of suppliers with food safety management system certification

Number of suppliers used in past 12 months	Number of these suppliers with food safety management certification	% with food safety management certification
1	0	0%
30	15	50%
3	2	67%
30	25	83%
75	65	87%
250	240	96%
1	1	100%
1	1	100%
3	3	100%
3	3	100%
3	3	100%
3	3	100%
5	5	100%
6	6	100%
18	18	100%
20	20	100%
20	20	100%
50	50	100%
150	150	100%

200	200	100%
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QF0B. Among the [INSERT NUMBER FROM QF0A ABOVE] individual suppliers you have sourced food for import from over the past 12 months (1 April 2015 – 31 March 2016), please indicate the number of suppliers that have specific food safety management system certification (e.g. BRC Global Standards, SQF, HACCP, ISO 9000, ISO 22000, etc.) Base: Those who identified both total suppliers and number of certified suppliers (n=20)

Those respondents who indicated that either all of their suppliers did not have food safety management system certification or didn't know if their suppliers held such accreditation were asked how they assure themselves that the food they are importing is compliant with the Food Standards Code and relevant food legislation. The majority of these said they relied on manufacturer or supplier declarations for this assurance (82%), while a further 53% said they achieved this through verification checks and testing.

1.4.15. Food safety management systems accepted

Respondents were asked to indicate which food safety management systems they accept as the basis of assurance from their suppliers. HACCP (92%), ISO 9000 (75%) and ISO 22000 (71%) were the most commonly identified systems accepted.

1.4.16. Number of suppliers of high risk foods with and without certification

Those importing higher risk foods were asked both how many suppliers they dealt with in the provision of these foods for import over the past three years, and also how many of these either had or did not have food safety management system certification.

Across all higher risk food types, the only products being sourced from suppliers without food safety management certification were raw or frozen bivalve molluscs (5 suppliers without certification out of 25 suppliers of these products in total) and raw ready to eat nuts (5 suppliers out of 83 suppliers of these products in total).

Table 5: Number of suppliers with and without certification imported from in last three years by high-risk food type

	Total number of suppliers with food safety management system certification	Total number of suppliers without food safety management system certification
Beef and beef products	2	0
Raw pork	20	0
Raw or frozen bivalve molluscs	20	5
Ready-to-eat minimally processed finfish	206	0
Raw milk cheese	4	0
Raw ready-to-eat fresh or frozen vegetables	2	0
Raw ready-to-eat fresh or frozen fruit	3	0
Raw ready-to-eat nuts	78	5

QF3A. For the following food types that you have imported over the past three years (1 April 2013 – 31 March 2016), please indicate the number of suppliers: with food safety management system certification (including any of those systems mentioned in the previous question); and without food safety management system certification.

Base: Respondents who indicated their business imported a high-risk food product in past three years & who knew if certified or not (n=14)

Across the 41 respondents to the survey, there were only two businesses that indicated importing a high risk food from a supplier without food safety management system certification – one importing raw or frozen bivalve molluscs, and one importing ready to eat nuts. Both of these businesses employed between 20 and 199 employees and indicated that food importing accounted for more than 70% of their total business operations.

1.4.17. Time taken to ensure suppliers comply with regulations

Respondents were asked about the process of taking on a new supplier of foods for import into Australia. Specifically, food importers were asked how many hours it took for them to be assured that the most recently engaged supplier's food product/s would meet the Food Standards Code and relevant food legislation. Estimated hours ranged from one hour to 120 hours, while a quarter of respondents couldn't provide an estimate. Among those providing an estimate, the majority fell within the 1-20 hour range, and there were few notable differences observed by business size or other importer characteristics.

1.4.18. Time taken to maintain food safety management system records

Those respondents with at least one supplier holding food safety management system accreditation were asked approximately how many hours it takes annually to maintain food safety management system assurance records for all accredited suppliers (including all relevant aspects such as certification checks, verifications, internal audits etc.). Estimates of time taken for this process ranged from one hour to 2080 hours (this was a business with 200+ employees who didn't know the exact volume of consignments imported over the preceding 12 months). Larger businesses were more commonly observed providing larger time estimates, as were businesses that identified food importing making up 70% of more off their total business operations.

1.4.19. Traceability – documented food recall systems

Respondents were asked if they have a documented food recall system in place. Some 73% of survey respondents said they had such a system in place, 15% said they did not and 12% were unsure. In percentage terms, similar levels of medium and large businesses recorded having a documented food recall system in place (81% and 80% respectively), with fewer respondents (at 60%) from small businesses reporting having such a system in place. Similarly, those businesses that reported food importing being 20% or less of their total business operations were generally less likely to have such a system in place.

Those with a food recall system in place were asked how easy or difficult it was for them to establish this system. Most respondents described this process as 'neither easy nor difficult' (47%), followed by 'difficult' (23%).

Those with a documented food recall system in place were asked to estimate how long it took (in hours) to initially establish the system. Estimates on the length of time for this process ranged from two hours through to 180 hours, while half of those with a food recall system in place didn't know how long it took to establish. By business size, responses in this sample showed a slight tendency for larger businesses to take longer to establish the food recall system than small businesses.

These respondents were also asked what were the main barriers or challenges of establishing a documented food recall system. While the range of answers given varied, the most common themes were the challenge of dealing with multiple stakeholders at the federal and state level, and the lack of a template companies could access and use for this purpose.

1.4.20. Time taken to maintain documented food recall system

Those with an established food recall system in place were asked how much time (in hours) it takes to maintain the system on an annual basis. Responses ranged from one hour to 60 hours per annum, while 27% indicated they didn't know. Responses again showed a slight tendency for larger businesses to report more hours to maintain their food recall system annually than smaller businesses, as did businesses where food importing made up a larger proportion of their overall business.

1.4.21. Food recall system functionality

Respondents were asked if their food recall system had the ability to identify the immediate supplier of a specific consignment of food into Australia, and also if it could identify the immediate customer/s of a specific consignment of food imported into Australia. Encouragingly, nearly all of those with food recall systems in place said their system allows for both of these functions (100% for identifying suppliers, and 97% for identifying customers).

Those with a food recall system in place were asked approximately how long it would take them (in hours) for their business to identify the immediate supplier of a specific consignment of food imported into Australia. Encouragingly, most indicated this would take only one hour (77%). No major differences were apparent in hours required to identify the immediate supplier of a consignment of food imported into Australia by business size, with the majority of respondents indicating an estimate in the 0-20 hours range (and obviously, that majority of these taking only 1 hour as per above).





Similarly, those with a food recall system in place were also asked approximately how long it would take them (in hours) for their business to identify the immediate customer/s of a specific consignment of food imported into Australia. Two thirds of these respondents suggested they would be able to provide this information within one hour.

Those without a documented food recall system in place were asked how easy or difficult they thought it would be to establish such a system for their food importing activities. Across the 11 respondents, most thought such a task would be 'neither easy nor difficult' or they 'don't know'.

Those currently without a documented food recall system were asked the main reason they currently don't have one. Most replied that they 'didn't know' (45%), followed by 'don't import sufficient volume to warrant it' (18%).

1.5. Conclusions

As noted above, the limited number of the respondents to the survey (41 in total) means any conclusions emerging from these findings are not applicable to all food importers (as would have been the case with a larger and more representative sample size). However, based on the findings we make the following observations for the Department's consideration.

-  **The ability to accurately estimate hours spent is a challenge for many** – The high proportion of ‘don’t know’ responses to hours spent undertaking specific food import tasks makes modelling of hours and the associated cost impact on a business importing food quite challenging. Given the limitations of this survey, we suggest an alternate approach may be required in terms of engaging a small number of small, medium and larger importers in a qualitative process (e.g. on a case study or exemplar basis) to provide more complete data for modelling purposes.
-  **Broadly speaking, the compliance effort required by food operators reflects the size of the business and the volume of food importing activity** – Hours reported for undertaking key compliance activities were generally higher both for medium and larger businesses and those where food importing makes up a major part of their overall business activities.
-  **Four in five respondents were licensed and/or registered as a food business at the state & territory level** – One of the objectives of the study was to build a database of food importers that could be used as a future channel to engage the sector on potential reforms. While the low response rate has not allowed this intention to be realised, the fact that 80% of respondents indicated being licensed and/or regulated as food businesses at the state and territory level indicates this may be a worthy of exploration as an alternate means of engaging with Australian food importers.
-  **Self-rated knowledge of food safety regulation governing food importing and confidence in ability to comply are both high** – At least among the 41 respondents to this survey, there was little evidence that food importers are lacking knowledge of the regulations governing their activities or have difficulty in complying with these. Given the self-select nature of the survey and the channels through which it was promoted, we would suggest this is more likely reflective of more frequent food importers than those doing this on a smaller or less frequent scale.
-  **The most preferred information channels for regulatory reform updates are Food Import Notices from the Department of Agriculture & Water Resources, the Food Standards Australia New Zealand Website and the Department of Agriculture & Water Resources Website.** These channels should be leveraged through any subsequent engagement activities or in communicating potential or actual regulatory reform.
-  **Awareness of Food Import Compliance Agreements (FICAs) was reasonably low** – More than half of respondents indicated they had not heard of a FICA, and among these one of the main barriers to not considering establishing one is a lack of knowledge about what they are. We believe better promotion of FICAs may serve to stimulate growth in those entering into such arrangements.
-  **The proposed reform to FICAs not covering all import activities is likely to stimulate greater take-up of these arrangements** – The findings showed that at least a quarter of

those not currently on a FICA would be more likely to apply for one if an importer could apply for only part of its importing activities.

- ▶ **The majority of importers source foods from suppliers that have food safety management system accreditation** - The overall proportion of suppliers with food safety management systems in place was high, and only a small proportion of suppliers of higher risk foods were identified not to have such systems in place. Together, these findings provide a reasonable level of assurance that food safety risk is being managed appropriately by survey respondents.
- ▶ **Traceability appears strong for those with documented food recall systems** – Those that have invested in developing a documented food recall system have the ability to readily trace one step forward or back in their supply chain, with the majority confident they could provide such information within one hour if needed.
- ▶ **Examine barriers to ensuring all importers meet their traceability obligations** – The key challenges identified by those who had established a food recall system were the challenge of dealing with multiple stakeholders at the federal and state level and the lack of a template companies could access and use for this purpose. We would encourage further discussion with smaller food importers about how food safety risks are appropriately managed and how they can potentially meet their traceability obligations within their operations.

2. Introduction

Colmar Brunton Social Research (CBSR) was approached by the Department of Agriculture and Water Resources (the Department) to conduct research into food importer compliance, awareness and import behaviour. This report presents the findings of this research.

2.1. Background

The Department of Agriculture and Water Resources has powers under the *Imported Food Control Act 1992* to operate a food safety inspection program known as the Imported Food Inspection Scheme (IFIS). The IFIS allows the Department to monitor food compliance with Australian New Zealand Food Standards Code (the Food Standards Code), and involves risk-based monitoring of imported food upon its arrival at Australia's borders. In the 1 January to 30 June 2015 period, over 13,000 lines of imported food were inspected under the IFIS.

Despite the scheme being designed to place greater risk management efforts on frequently imported and/or higher risk foods, recent food safety issues with imported food, such as the *hepatitis A* outbreak linked to frozen berries incident in February 2015, have revealed that the current system has limited ability to hold importers accountable for the safety of imported food and to identify and respond to imported food issues.

The Department is currently developing a program of proposed reforms to the management of imported food, with the ultimate goal of providing greater assurance to the public that imported food is safe through the implementation of a range of legislative and non-legislative measures. These proposed reforms require the development of a Regulation Impact Statement (RIS) to assess the costs and benefits of each proposed measure.

As such, the cost benefit analysis required access to, and analysis of, specific types of food importer information that are not currently available. The Department sought a suitably qualified service provider to undertake an online survey of food importers and to use the data to develop a robust database of food importer information.

2.2. Objectives of the research

The objectives of the research project were to:

- ▶ Establish a database of food importer information that enables segmentation by specific criteria such as demographics, size/turnover, food types, source countries, use of food safety systems or other systems for compliance, costs of compliance, and state or territory food business registration/licence;

- ▶ Provide a summary report of the research analysis including food importer segmentation, national footprint, costs of compliance, extent of food safety systems, and key statistical conclusions and relevance;
- ▶ Obtain sufficient information regarding the type and level of involvement of importers in the food recall process, their ability to trace imported food back one step to the supplier and forward one step to the customer, and how food importers understand and meet their food recall obligations; and
- ▶ Understand importer consideration of, and interest in, entering into a Food Import Compliance Agreement (FICA) with the Department, and the perceived barriers and benefits of doing so.

3. Methodology

The following approach was used for this research project:

- ▶ Stage 1: Project scoping meeting;
- ▶ Stage 2: Survey design and cognitive testing with food importers;
- ▶ Stage 3: Quantitative data collection; and
- ▶ Stage 4: Data processing, analysis and reporting.

Each of these stages is discussed briefly below.

3.1. Stage 1: Project scoping meeting

An initial project scoping meeting was held on 4 March 2016 between members of the Colmar Brunton Social Research (CBSR) team and the Imported Food Reform team within the Department. The scoping meeting allowed Colmar Brunton to develop a more detailed contextual understanding of potential food importation reforms and how the findings of the study would inform this process.

At the meeting, the ability to access a sample frame for the survey was discussed, with the most accurate and up to date sample frame identified as the importation records collected by the Department of Immigration and Border Protection (consisting of importer contact details). However, legal advice deemed this was not possible due to limited statutory authority to access and disclose this information.

3.2. Stage 2: Survey design and cognitive testing

Following the project planning meetings, Colmar Brunton developed the draft questionnaire which was provided to the Department's project team for feedback prior to finalisation. The final questionnaire can be found at Appendix B.

Industry Consultation

To ensure the survey was asking questions of food importers that were both relevant and asked in an appropriate context, the Department circulated the draft questionnaire to members of the Department's Imported Food Consultative Committee (comprising a range of members, including food importers, nationally) for feedback. This feedback was received and reflected in a revised draft survey instrument.

Cognitive interviews

To ensure the revised survey was eliciting the data as intended from participants, a series of nine cognitive interviews were conducted from 6 – 9 April 2016 with food importers employers ranging from small importers (one to two consignments per annum) through to very large food importers (thousands of consignments imported per annum). These interviews involved asking respondents not only to answer each of the proposed survey questions, but to describe the mental processes used at arriving at their response. These interviews showed responses were congruent with our intent (or guidance on amendments required to obtain

the data that was needed), providing assurance that the survey questions were being interpreted and answered in accordance with their intended meaning.

Feedback obtained through these interviews was used in further refining the questionnaire, with the Department subsequently approving the final survey instrument in light of these findings.

3.3. Stage 3: Quantitative data collection

As noted above, the lack of an available and accessible sample of those importing food to Australia meant that the online survey had to be conducted on a self-select basis.

The online self-select² survey was promoted via a number of channels:

- ▶ Promotional messages encouraging food importers to complete the survey were included on a number of websites including the Department's own website, the Integrated Cargo System home page and business.gov.au;
- ▶ Similar messages were included in Departmental notices including an Imported Food Industry Advice Notice, and an Import Clearance Industry Advice Notice;
- ▶ The Department provided promotional material to be used by key stakeholder groups including the Imported Food Consultative Committee, the Food and Beverage Importers Association, the Horticulture Imports Committee; the Retailers and Manufacturers Liaison Committee, the Department of Agriculture and Water Resources Cargo Consultative Committee, state and territory food regulators, and the Department of Immigration and Border Protection customs broker network;
- ▶ A printed postcard promoting the survey was handed to importers during imported food inspections; and
- ▶ Promotion of the survey via the Department's social media channels.

The survey was undertaken from 18 April 2016 to 3 May 2016 and a total of 41 surveys were completed during this period.

The final questionnaire can be found at Appendix B.

3.4. Stage 4: Data processing, analysis and reporting

This report presents the results from the survey. Given the very small number of completed surveys achieved, these findings should be viewed as representative of the experiences of this small number of respondents only.

Given the small number of respondents, no additional analysis of findings by demographic factors on a statistical basis has been possible. However, commentary has been provided on a descriptive basis where patterns in responses are evident.

² Given the self-select nature of the survey and the small number of respondents, it must be noted that the findings should only be read as indicative of the broader sector, as opposed to being representative of all Australian food importers.

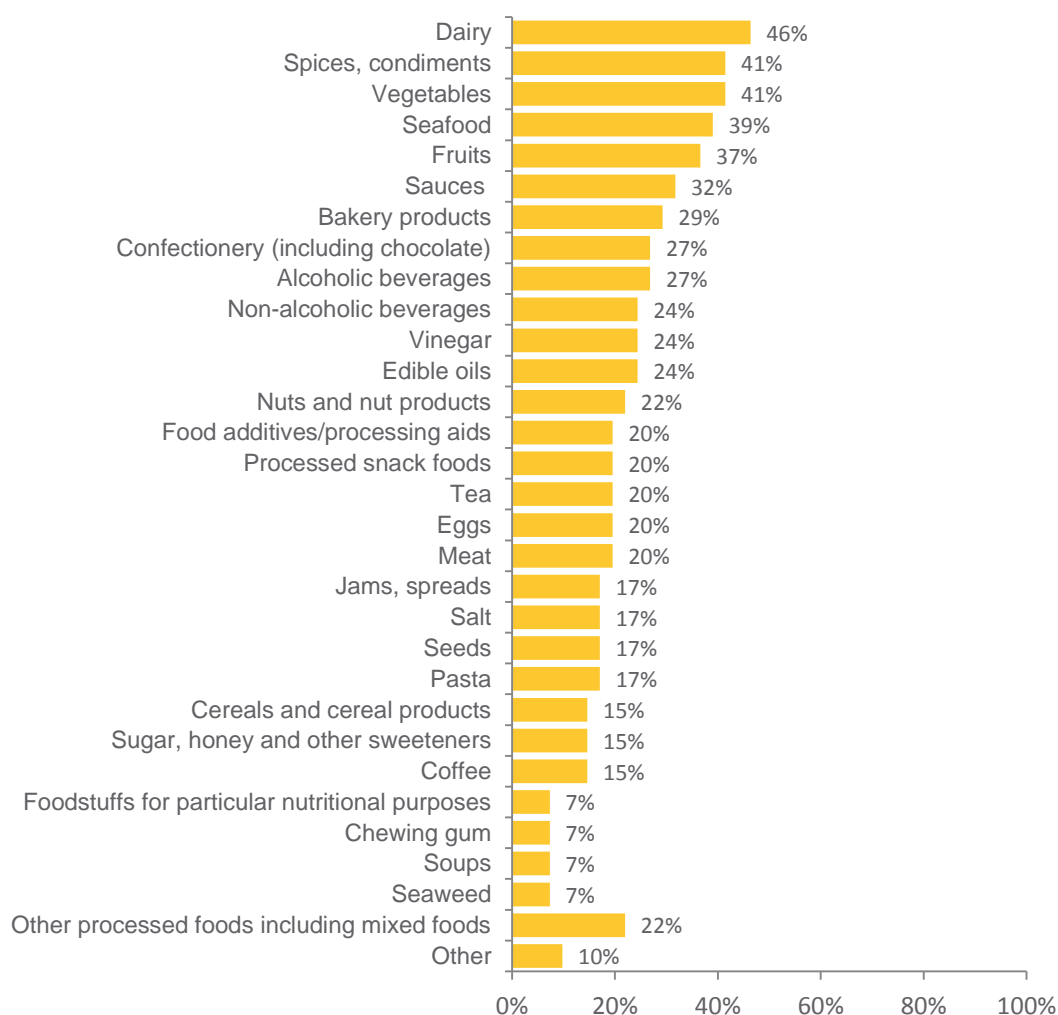
4. Quantitative findings

4.1. Food importing activities

4.1.1. Types of food imported in the past three years (1 April 2013 – 31 March 2016)

Respondents were asked what types of foods they had imported over the past three years. A broad range of food types were identified, with the most common being dairy (46% having imported dairy products over this period), spices and condiments (41%), vegetables (41%), seafood (39%), fruits (37%) and sauces (32%).

Figure 2. Types of food imported



QB1. Which of the following types of foods did your business import in the past 3 years (1 April 2013 – 31 March 2016)?
Please select all that apply Base: All respondents (n=41)

4.1.2. Importation of high-risk food

Respondents were asked about importation of food types that present a higher risk of food safety issues. Between 2% and 12% of respondents indicated they had imported these respective food types in the past three years. Given the small sample sizes, there were no discernible patterns of those more or less likely to be importing such foods, with these importers ranging from smaller to larger businesses by employee numbers.

Table 6: Types of high-risk food imported

	%	n
Beef and beef products	7%	3
Raw pork	5%	2
Raw or frozen bivalve molluscs	10%	4
Ready-to-eat minimally processed finfish	12%	5
Raw milk cheese	10%	4
Raw ready-to-eat fresh or frozen vegetables	5%	2
Raw ready-to-eat fresh or frozen fruit	10%	4
Raw ready-to-eat nuts	10%	4
Semi-dried tomatoes	2%	1

QB2A. Has your business imported any of the following higher risk food types in the past three years (1 April 2013 – 31 March 2016)? Base: All respondents (n=41)

Respondents who indicated they had imported raw vegetables, fruit and/or nuts were asked to specify the exact types of food imported. The verbatim responses for each category are listed below.

Raw ready-to-eat fresh or frozen vegetables (n=2):

- ▶ Frozen peas and beans
- ▶ Mixed frozen vegetables, packed in plastic bags

Raw ready-to-eat fresh or frozen fruit (n=4):

- ▶ Frozen strawberries
- ▶ Frozen raspberries, red currants, black currants, and blueberries
- ▶ Various frozen fruit purees
- ▶ Frozen raspberries

Raw ready-to-eat nuts (n=4):

- ▶ Peanuts, peanut butter, cashews, hazelnuts, almonds, brazil nuts, and walnuts
- ▶ Walnuts, cashews, pistachios, pine nuts, and almonds
- ▶ Peanut, pistachio, watermelon seed, and sunflower seeds
- ▶ Raw and cooked chestnuts

4.1.3. Location of high-risk imported foods

Those respondents indicating they had imported one of the higher risk foods over the past three years were asked to identify which country or countries they had imported these products from.

Table 7: Countries from which higher-risk food have been imported

	Country	# of selections
Food type		
Beef or beef products (n=3)	Japan	1
	New Zealand	1
	Taiwan	1
Raw pork (n=2)		
	Canada	1
	Denmark	1
	Italy	1
	Netherlands	1
	United Kingdom	1
	United States	1
Raw or frozen bivalve molluscs (n=4)		
	Chile	1
	China	1
	Italy	1
	Japan	2
	Myanmar	1
	New Zealand	1
	Peru	1
	Taiwan	1
	Thailand	2
Ready-to-eat minimally processed finfish (n=5)		
	Belgium	1
	Denmark	2
	Estonia	1
	Ireland	1
	Japan	1
	Malta	1
	Morocco	1
	New Zealand	1
	Norway	1
	Poland	1
	Slovenia	1
	South Africa	1

	Sweden	2
	Taiwan	1
	United Kingdom	1
Raw milk cheese (n=4)		
	Austria	1
	Canada	1
	Colombia	1
	France	4
	Greece	1
	Ireland	2
	Italy	2
	Malaysia	1
	Netherlands	1
	Poland	1
	Singapore	1
	Spain	2
	United Kingdom	1
	United States	1
Raw ready-to-eat fresh or frozen vegetables (n=2)		
	China	2
	Japan	1
	Spain	1
	United States	1
Raw ready-to-eat fresh or frozen fruit (n=4)		
	Belgium	1
	China	1
	France	2
	Greece	1
	Netherlands	1
	Poland	1
	Serbia	1
Raw ready-to-eat nuts (n=4)		
	Argentina	1
	Bolivia	2
	Brazil	2
	Canada	1
	Chile	1
	China	2
	France	1
	Greece	1
	India	2

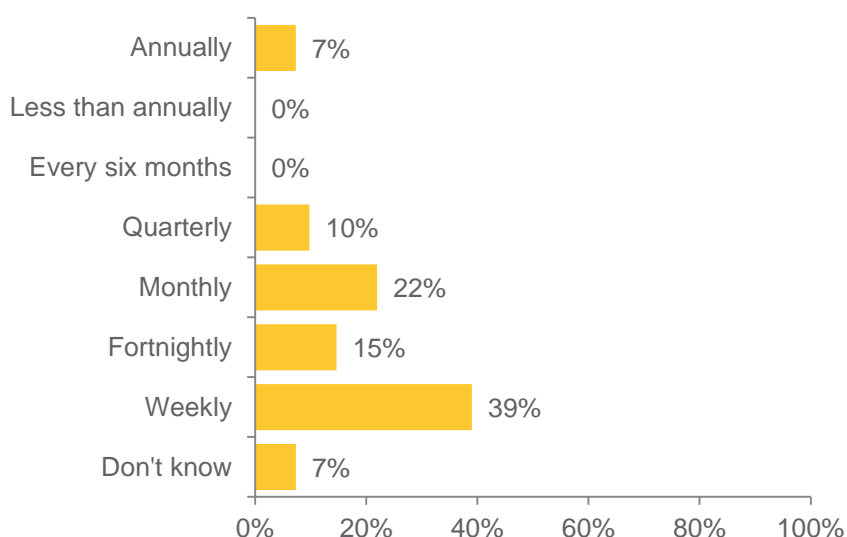
	Indonesia	1
	Italy	1
	Malaysia	1
	Mexico	1
	New Zealand	1
	Peru	1
	Philippines	1
	Taiwan	2
	Thailand	1
	Turkey	1
	United States	2
	Vietnam	2
Semi-dried tomatoes (n=1)		
	Italy	1

QB2B. Which country or countries do you import the following foods from? Base: Respondents who indicated their business imported a high-risk food product in past three years (n=14)

4.1.4. Frequency of food imports into Australia

Respondents were asked to indicate the frequency of their food importing activity. The most common response was 'weekly' (39%), followed by 'monthly' (22%) or 'fortnightly' (15%). Businesses where food importing made a large proportion of their business (e.g. 70%+) were more likely to be importing on a more regular basis, as were medium and larger businesses (those employing 20 or more staff).

Figure 3. Frequency of food imports in past 12 months



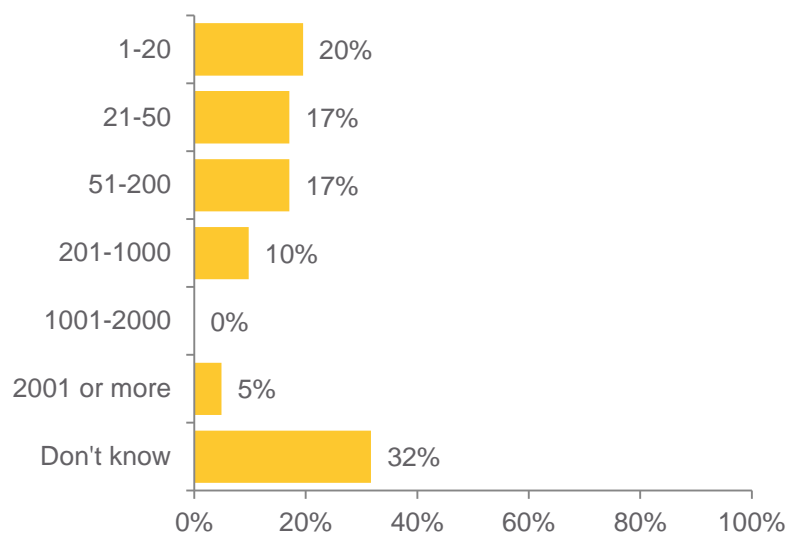
QB3. Over the past 12 months (1 April 2015 – 31 March 2016) how frequently have you imported foods into Australia? Base: All respondents (n=41)

4.1.5. Quantity & value of imports into Australia

Respondents were asked approximately how many consignments of food their business imported over the 12 months to 31 March 2016. Close to a third of respondents indicated they didn't know how many consignments had been imported (32%), while 20% said they imported 20 or fewer consignments over this period. Just 5% of respondents indicated they imported more than 2000 consignments over this period.

Those businesses employing 20-199 employees were observed to be most commonly importing between 200 and 1000 consignments a year, while respondents from larger companies (200+ employees) were largely unable to put a specific number on the volume of consignments.

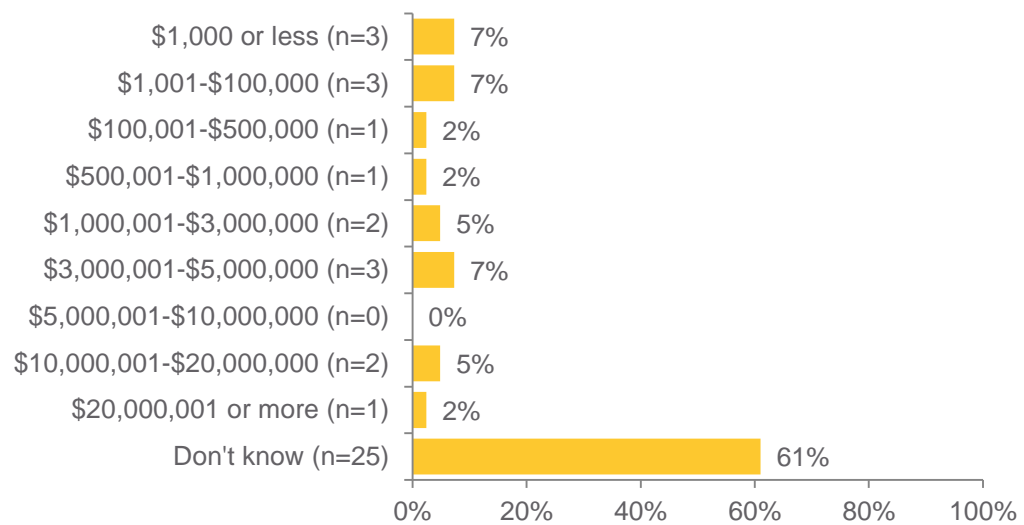
Figure 4. Number of consignments in past 12 months



QB4. Over the past 12 months (1 April 2015 – 31 March 2016) approximately how many consignments of food has your business imported into Australia? Base: All respondents (n=41)

Around three in five respondents (61%) were unable to put an approximate Australian dollar value of their total imports for the 12 months ending 31 March 2016. There was no clear relationship between business size and dollar values of goods imported.

Figure 5. Value of foods imported in past 12 months



QB5A. Over the past 12 months (1 April 2015 – 31 March 2016) what was the approximate total Australian dollar value of all foods you imported into Australia? Base: All respondents (n=41)

4.1.6. Time taken to ensure imports comply with the Food Standards Code

One of the aims of the survey was to explore the impost of the current food safety legislation on those importing food into Australia. To this end, respondents were asked the average number of hours - per week – it took their business to ensure food imported into Australia was compliant with the Food Standards Code and related food legislation (including any hours billed to brokers and any other consultants/experts).

Average weekly hours reported varied from zero (one respondent) to 200 hours (one respondent). An average weekly time of one hour was the most common response (six respondents), followed by 20 hours (three respondents). Across those able to give an estimated number of hours per week, the average was 21 hours per week, while the median was eight hours per week. When looked at by business size, responses across the groups followed a similar pattern with the majority in the 0-20 hour per week range. The highest estimate given (200 hours) was by a respondent from a large business (200 or more employees).

Table 8: Average hours per week spent ensuring compliance with Food Standard Code and related legislation

Hours	%	N
0	2%	1
1	15%	6
2	5%	2
4	2%	1
5	5%	2
8	2%	1
10	2%	1
15	2%	1
16	5%	2
20	7%	3

40	5%	2
45	2%	1
50	2%	1
200	2%	1
Don't know	39%	16

QB5B. Over the past 12 months (1 April 2015 – 31 March 2016), what was the estimated average time (in hours) per week it took your business to ensure food imported into Australia was compliant with the Food Standards Code and related food legislation? Please include hours billed to Brokers and other external consultants/experts. Base: All respondents (n=41)

Table 9: Average hours per week spent ensuring compliance with Food Standard Code and related legislation by business size (number of employees)

Hours	Small (0-19)	Medium (20-199)	Large (200 or more)
0-20	12	4	4
21-50	1	3	0
51-200	0	0	1
Don't know	2	9	5

QB5B. Over the past 12 months (1 April 2015 – 31 March 2016), what was the estimated average time (in hours) per week it took your business to ensure food imported into Australia was compliant with the Food Standards Code and related food legislation? Please include hours billed to Brokers and other external consultants/experts. Base: All respondents (n=41); QA3. How many employees does your business have?

In addition to asking for this estimate of average hours, respondents were asked what proportion of these average hours per week was undertaken by staff at a range of levels. Management and administrative staff had the highest average 'share' of this workload at 34% and 28% respectively.

Figure 6. Average proportion of time taken to ensure compliance by staff type



QB5C. In percentage terms, approximately what proportion of this work is undertaken by the following staff levels? [For example, if all the work is undertaken by administrative staff, please allocate 100% against this level]. Base: All respondents providing an estimate at QB5B (n=25)

Respondents who provided a portion of this average workload being undertaken by an 'External consultant/expert (other than brokers)' were asked to specify exactly what type of external consultant or expert they used. The responses were (n=3):

- ▶ Researchers and plant pathologists
- ▶ Australian Government – DAF
- ▶ Customs broker

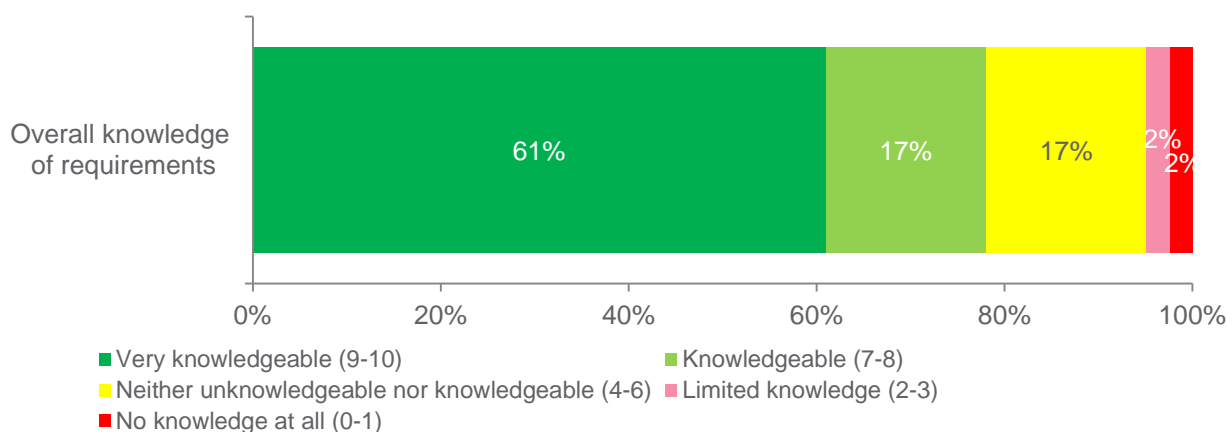
4.2. Knowledge of food importing legislation

4.2.1. Overall knowledge of imported food legislation

Respondents were asked to rate their company's overall knowledge of the Food Standards Code and imported food legislation on a scale of 0 to 10, where 0 was 'No knowledge at all' and 10 was 'Very knowledgeable'.

Overall, respondents rated their company's knowledge of the code and imported food legislation quite highly, with 61% proving a rating of 9 or higher out of 10. Just 4% indicated a low level of knowledge in this regard. Larger businesses (those with 20-199 employees or 200+ employees) were generally more likely to self-assess their knowledge as higher than smaller businesses.

Figure 7. Company's knowledge of the Food Standards Code and food importing legislation requirements



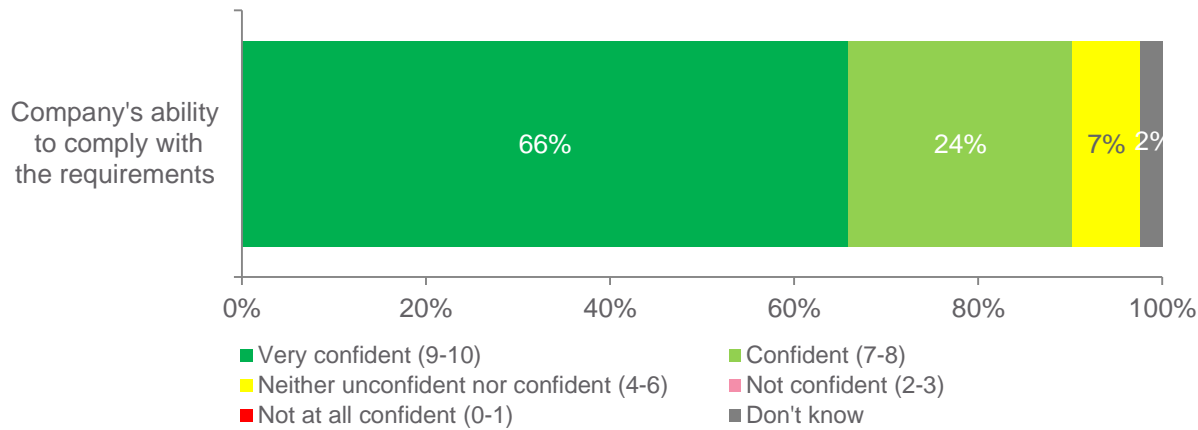
QC1. On a scale of 0 to 10, where 0 is 'No knowledge at all' and 10 is 'Very knowledgeable', how do you rate your company's overall knowledge of requirements of the Food Standards Code and imported food legislation including the requirements and obligations these place on your food importing activities? Base: All respondents (n=41)

4.2.2. Confidence in ability to comply with imported food legislation

Respondents were also asked how confident they were in their company's ability to comply with the Food Standards Code and imported food legislation on a 0-10 scale, where 0 was 'Not at all confident' and 10 was 'Very confident'. Two thirds of respondents indicated they were 'very confident' in their company's ability to comply, while a further 24% said they were confident. No respondents indicated a lack of confidence in their

company's ability to comply. Again, larger businesses were generally more likely to rate their confidence as very high.

Figure 8. Company's confidence in ability to comply with Food Standards Code



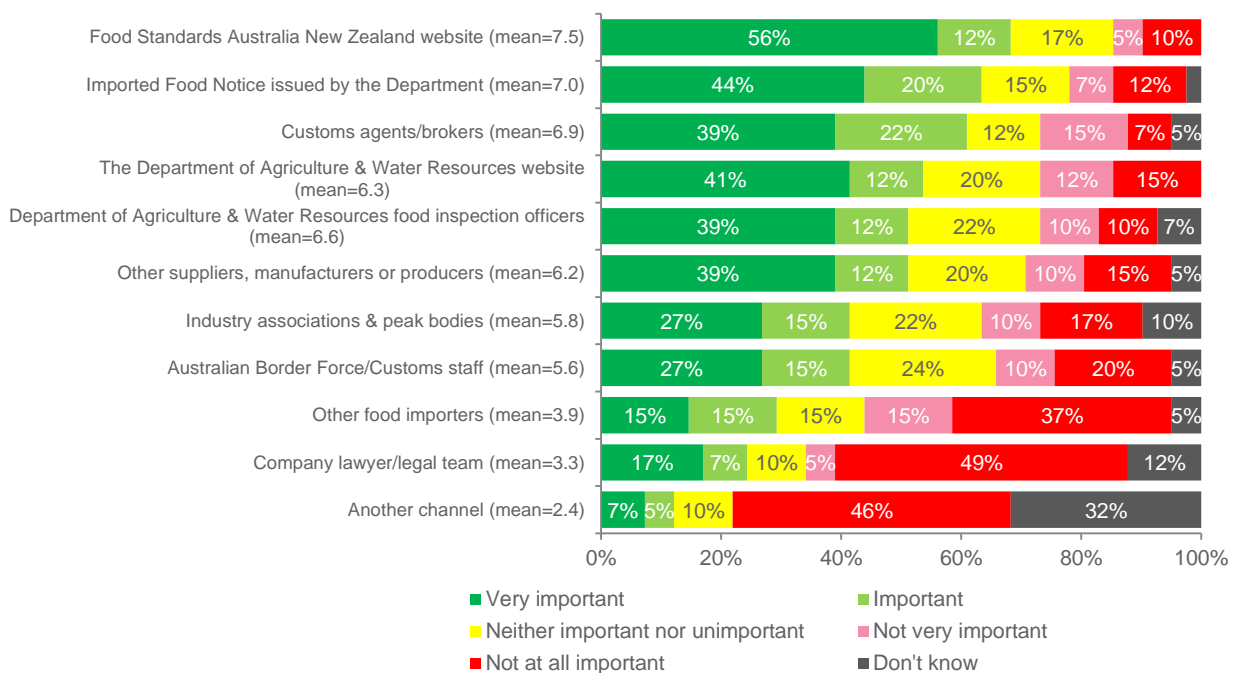
QC2. On a scale of 0 to 10, where 0 is 'Not at all confident' and 10 is 'Very confident', how confident are you in your company's ability to comply with the requirements of the Food Standards Code and imported food legislation? Base: All respondents (n=41)

4.2.3. Importance of information sources in helping to comply

Respondents were asked to rate the importance of a range of information sources in helping them meet their obligations under the Food Standards Code and imported food legislation. The Food Standards Australia New Zealand website was rated the most important source of information (mean rating of 7.5/10), followed by an Imported Food Notice (IFN) (7.0/10), Customs agents/brokers (6.9/10) and the Department of Agriculture & Water Resources food inspection officers (6.6/10) and the Department of Agriculture & Water Resources website (6.3/10).

Larger importing businesses (those with more than 200 employees) were generally more likely to rate both their internal legal team; their suppliers, manufacturers or producers; and peak bodies as important sources of information over smaller businesses.

Figure 9. Importance of information sources in helping with imported food legislation compliance

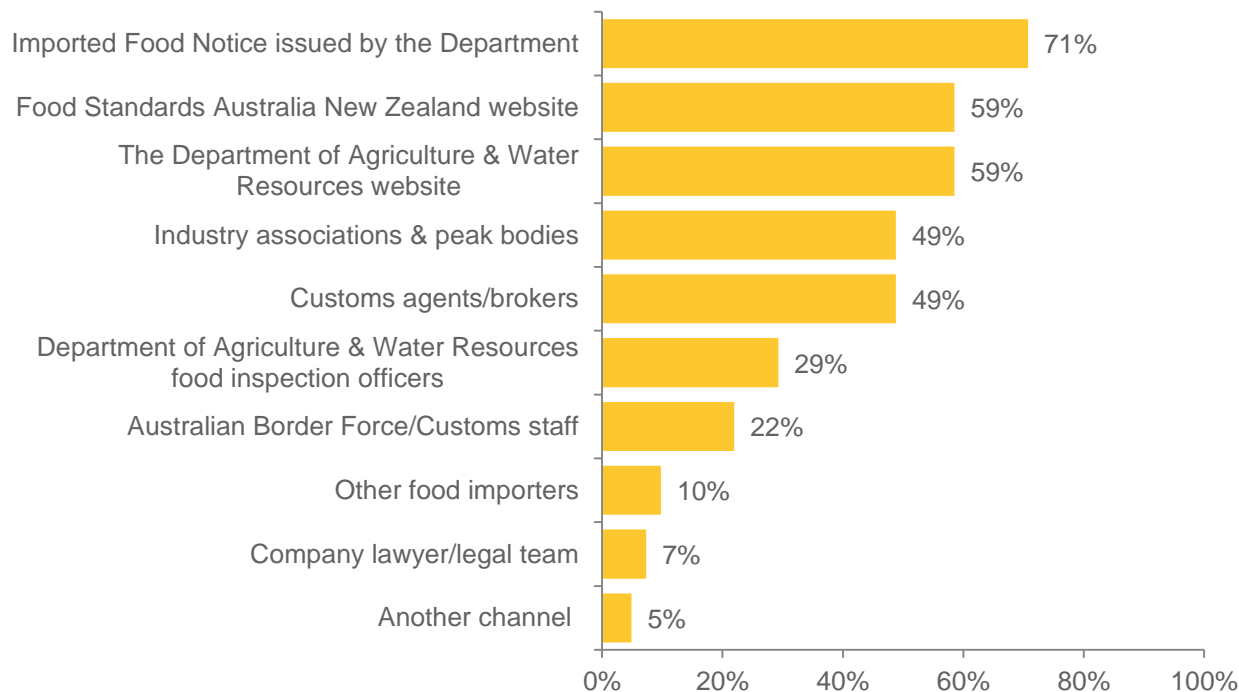


QC3. On a scale of 0 to 10, where 0 is 'Not at all important' and 10 is 'Very important', how important are the following sources of information in helping you to meet your business' obligations under the Food Standards Code and imported food legislation? Base: All respondents (n=41). Note: for ease of reading, figures below 3% are not shown.

4.2.4. Preferred channels through which to receive information

In addition to asking about which information sources were most important, respondents were also asked which channels through which they would prefer to receive information on any changes to food importing regulations. The results were broadly similar to the previous question, with Food Import Notices from the Department of Agriculture & Water Resources (71%), the Food Standards Australia New Zealand Website (59%) and the Department of Agriculture & Water Resources Website (59%) emerging as the most preferred channels overall. These findings were broadly consistent by size of the importing business.

Figure 10. Preferred channels through which to receive information about changes to food importing regulations



QC4. Through which of the following channels would you most prefer to receive information about any changes to food importing regulations? Select all that apply. Base: All respondents (n=41)

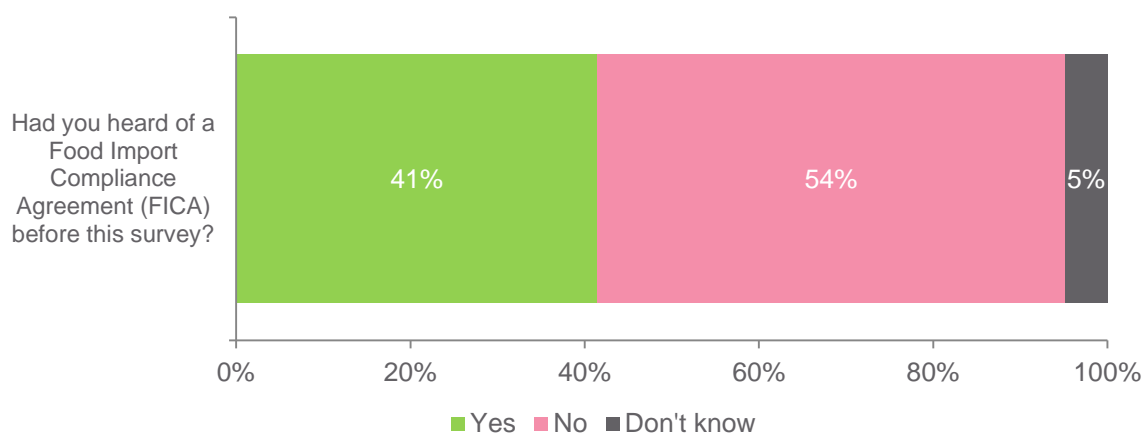
The two respondents who selected 'another channel' both gave the response of 'email' when asked to specify.

4.3. Food Import Compliance Agreement (FICA) participation

4.3.1. Awareness of Food Import Compliance Agreements

Respondents were asked if they had heard of a Food Import Compliance Agreement (FICA) prior to the survey. Some 41% of respondents said they had heard of a FICA previously, while 54% indicated they had not heard of such agreements prior to the survey. Larger businesses, businesses with their headquarters in Australia and those where food importing makes up a larger proportion of their overall business were generally more aware of FICAs than other groups.

Figure 11. Awareness of Food Import Compliance Agreements before the survey

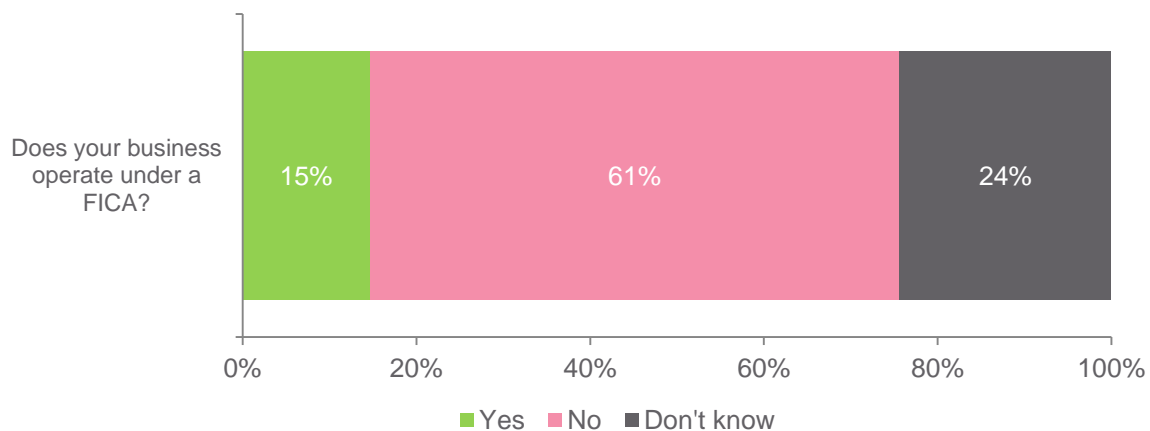


QD1. Had you heard of a Food Import Compliance Agreement (otherwise known as a FICA) before this survey? Base: All respondents (n=41)

4.3.2. Use of Food Import Compliance Agreements

Some 15% of survey respondents (6 businesses) indicated their business operates under a Food Import Compliance Agreement, 61% said they did not and a further 24% were unsure. Of the six businesses with a FICA, the majority of these were medium to large businesses (20-199 or 200+ employees), had headquarters in Australia and where food importing made up 70% or more of their overall business.

Figure 12. Use of Food Import Compliance Agreements

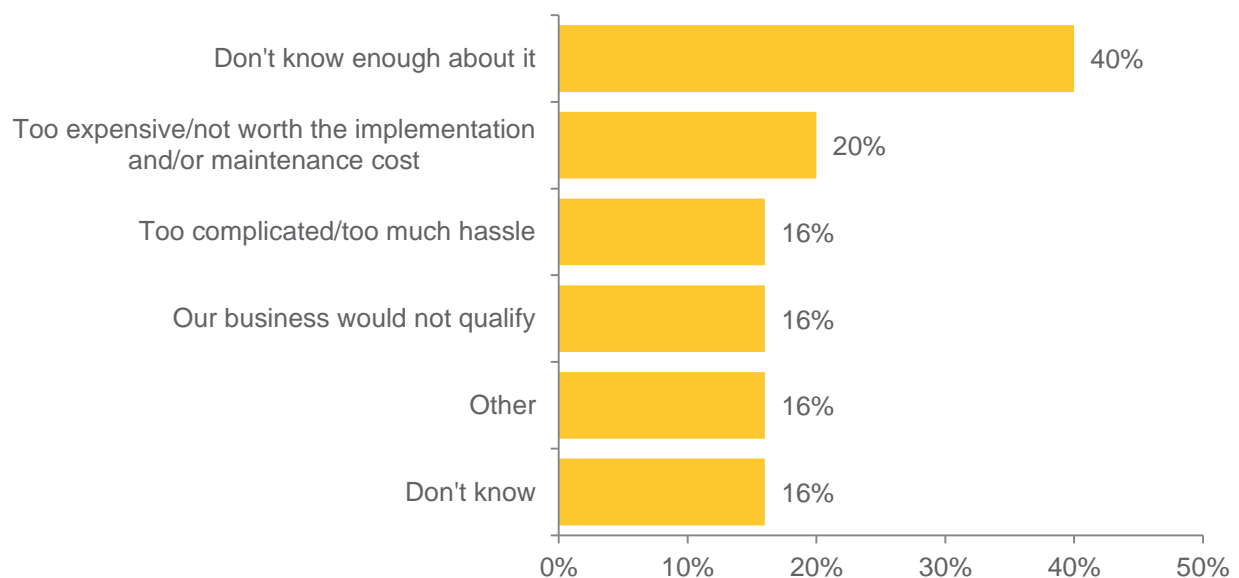


QD2. Does your business operate under a Food Import Compliance Agreement? Base: All respondents (n=41)

4.3.3. Barriers to establishing a FICA

Those who indicated they were not currently operating under a FICA were asked what the main barriers were to them seeking a FICA for their food importing activities. The most common barrier identified was 'not knowing enough about what a FICA is and how they work' (40%), followed by the agreement being 'too expensive/not worth the implementation and/or maintenance cost' (20%). Some 16% could not identify any specific barriers to them seeking a FICA.

Figure 13. Barriers to establishing a Food Import Compliance Agreement



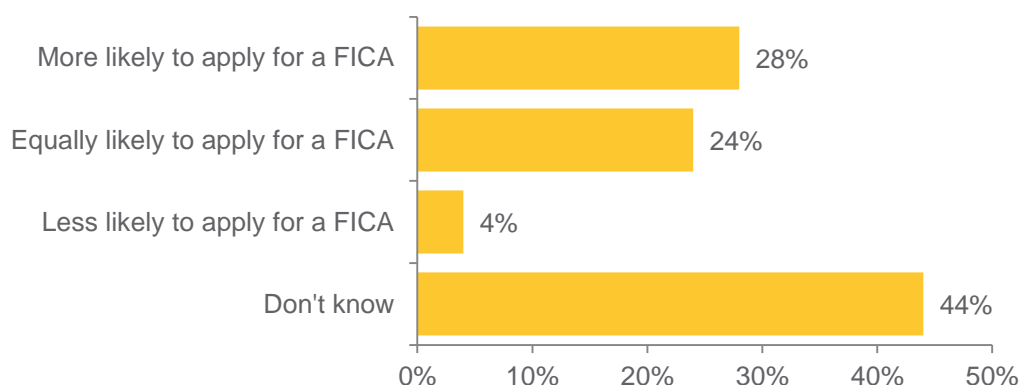
QD3. Does your business operate under a Food Import Compliance Agreement? Please select all that apply. Base: Respondents who don't currently have a FICA (n=25)

4.3.4. Likelihood of establishing a FICA if part-imports could be covered

Currently, any food importing business entering into a FICA needs to ensure all foods they import meet the conditions of the agreement. Those currently without a FICA were asked if they would be more likely, less likely or equally as likely to apply for a FICA if their business could apply for part of its importing activities to be covered only.

Some 28% of those without a FICA currently said they would be more likely to apply for a FICA if this change was made, 24% said they would be equally as likely, while just 4% said they would be less likely. A further 44% of respondents said they didn't know how such a change would affect their likelihood to apply for a FICA into the future, likely reflecting the limited awareness of FICAs overall and what value they could potentially provide for the business.

Figure 14. Likelihood of applying for a Food Import Compliance Agreement if they could apply for it to cover part of its food importing activities



QD4. Currently those entering into a FICA need to ensure that all food types they import meet the conditions of the agreement. Would you be more likely, less likely or equally as likely to apply for a FICA if your business could apply for part of its importing activities to be covered only (e.g. a specific category or type of food)? Base: Those currently without a FICA (n=25)

4.3.5. Time taken to establish a FICA

Those respondents who indicated they had a FICA in place were asked how long it took them (in hours) to originally establish the FICA within their business. Of the six respondents who indicated they had a FICA in place, the time taken to originally establish this ranged from 10 hours to 300 hours. As the total number of this particular group was very small, it is difficult to identify patterns; however respondents from medium and large businesses reported slightly longer hours taken to establish the FICA.

Table 10: Time in hours taken to establish the FICA

Hours	n
10	1
50	1
80	1
150	1
300	1

Don't know	1
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QD5A. Can you provide an estimate of the time it took your business to originally establish the FICA? Base: Respondents with a FICA in place (n=6)

As the total number of this particular group was very small, it is difficult to identify patterns; however it is noted that respondents from medium and large businesses reported longer hours taken to establish the FICA. No differences were apparent by whether Australian-based or not or by import locations.

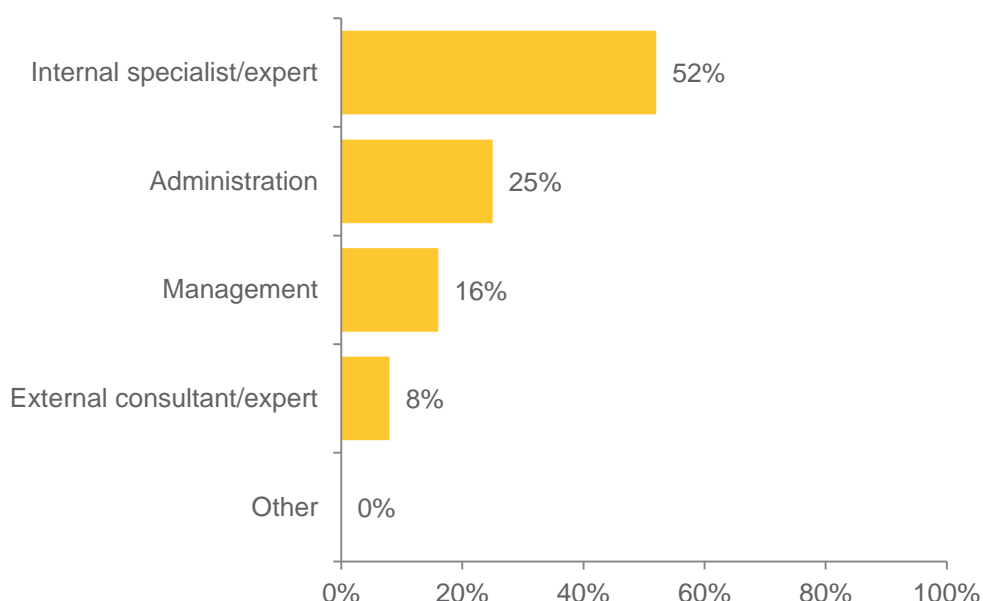
Table 11: Time in hours taken to establish the FICA by business size (number of employees)

Hours	Small (0-19)	Medium (20-199)	Large (200 or more)
0-20	1	0	0
21-50	0	1	2
51-200	0	0	0
201 or more	0	1	0
Don't know	0	1	0

QD5A. Can you provide an estimate of the time it took your business to originally establish the FICA? Base: Respondents with a FICA in place (n=6); QA3. How many employees does your business have? Proportion of FICA establishment work undertaken by each staff type

These respondents were also asked what proportion of hours taken to initially establish the FICA was undertaken by staff at a range of levels. Internal specialist/experts had the highest average 'share' of this workload at 52%, suggesting this task commonly required the assignment of dedicated internal resources to establish.

Figure 15. Proportion of time taken in FICA establishment by staff type



QD5B. In percentage terms, approximately what proportion of this work was undertaken by the following staff levels? [For example, if all the work is undertaken by administrative staff, please allocate 100% against this level]? Base: Respondents giving an answer of 'Yes' at QD2 (n=6)

Respondents who provided an answer against 'External consultant/expert' were asked to specify. The responses were (n=2):

- ▶▶▶ Food technologist
- ▶▶▶ DAWR Biologicals and Quarantine Department knowledgeable persons

4.3.6. Time taken to maintain the FICA

Those with a FICA were asked to provide an estimate of the hours it takes their business to maintain the FICA on an annual basis. Of the four food importers able to provide such an estimate, average time ranged from 10 hours to 200 hours, while the other two said they didn't know. While the total number of this particular group was again too small to identify patterns, in this sample respondents from medium and large businesses recorded longer hours taken to maintain the FICA than those from smaller businesses.

Table 12: Time taken in hours to maintain the Food Import Compliance Agreement annually

Hours annually	n
10	1
100	1
120	1
200	1
Don't know	2

QD6A. Can you provide an estimate of the time in hours it takes your business to maintain the FICA on an annual basis?
Base: Respondents with a FICA currently in place (n=6)

Table 13: Time taken in hours to maintain the Food Import Compliance Agreement annually by business size (number of employees)

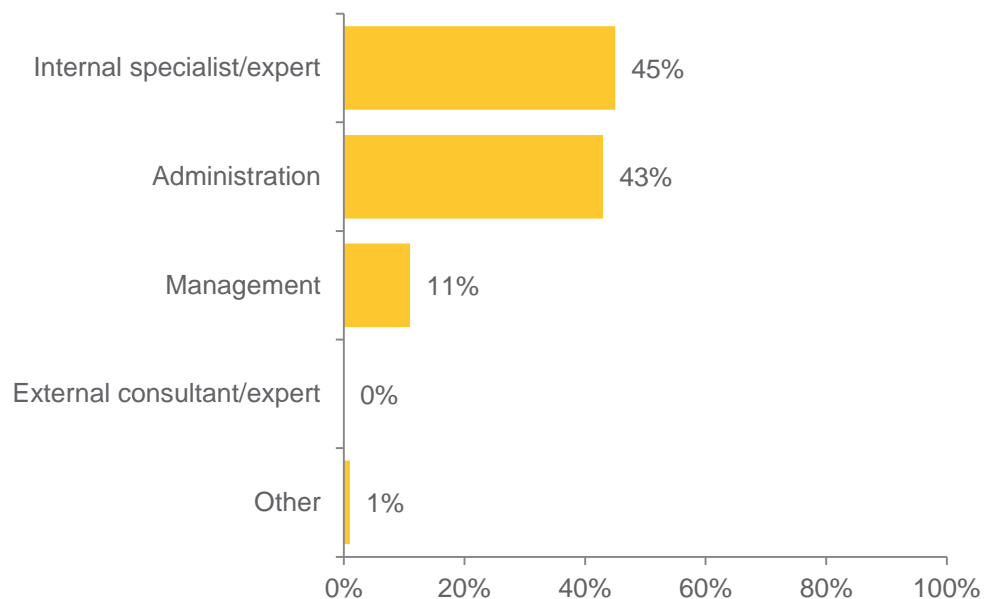
Hours	Small (0-19)	Medium (20-199)	Large (200 or more)
0-20	1	0	0
21-50	0	0	0
51-200	0	1	2
Don't know	0	2	0

QD6A. Can you provide an estimate of the time in hours it takes your business to maintain the FICA on an annual basis?
Base: Respondents with a FICA currently in place (n=6); QA3. How many employees does your business have?

4.3.7. Proportion of FICA maintenance work undertaken by each staff type

These respondents were also asked what proportion of these hours to maintain the FICA annually were undertaken by staff at a range of levels. Internal specialist/experts had the highest average 'share' of this workload at 45%, followed by administration staff at 43%.

Figure 16. Proportion of time taken in FICA maintenance by staff type



QD6B. In percentage terms, approximately what proportion of this work was undertaken by the following staff levels? [For example, if all the work is undertaken by administrative staff, please allocate 100% against this level] Base: Respondents with a FICA currently in place (n=4)

4.4. Cost of complying with IFIS

4.4.1. Quantity of consignments subject to inspection

Respondents not currently on a FICA were asked approximately how many consignments of imported food were subject to IFIS inspection over the 12 months to 31 March 2016. Numbers of consignments referred for IFIS inspection (only, e.g. without concurrent quarantine inspection) ranged from 0 to 200 consignments. Medium businesses (20-199 employees) more commonly said between 21 and 50 consignments were referred to IFIS inspection only over this period. Some 43% of respondents said they didn't know how many consignments had been referred.

Table 14: Quantity of consignments subject to Imported Food Inspection Scheme only

Number of consignments	%	n
0	9%	3
1	9%	3
2	3%	1
5	3%	1
10	3%	1
11	3%	1
12	6%	2
15	3%	1
24	3%	1
25	3%	1

30	3%	1
35	3%	1
40	3%	1
50	3%	1
200	3%	1
Don't know	43%	15

QE1. In the 12 months (1 April 2015 – 31 March 2016), approximately how many consignments of imported food were subject to the following inspection types? Base: Respondents not currently on a FICA (n=35)

Similarly, respondents were asked how many consignments had been referred to a joint IFIS and quarantine inspection in the 12 months to 31 March 2016. Numbers of consignments referred for joint IFIS and quarantine inspection only ranged from 0 to 400 consignments. Those businesses reporting higher volume of referrals were medium or larger sized businesses by employee numbers (and this is broadly consistent with these groups reporting higher volumes of consignments imported overall as reported earlier). Some 43% of respondents said they didn't know how many consignments had been referred for joint inspection.

Table 15: Quantity of consignments subject to joint Imported Food Inspection Scheme and quarantine inspection

Number of consignments	%	n=
0	34%	12
2	3%	1
3	3%	1
5	3%	1
15	6%	2
40	3%	1
50	3%	1
400	3%	1
Don't know	43%	15

QE1. In the 12 months (1 April 2015 – 31 March 2016), approximately how many consignments of imported food were subject to the following inspection types? Base: Respondents not currently on a FICA (n=35)

4.4.2. Types of food inspected

Respondents were asked to indicate what type of food was most recently referred for IFIS inspection. The food types mentioned are reflected in Table 16 below.

Table 16: Food types inspected at most recent consignment

Response
Food ingredient source of iron
Cheese
Sesame seeds
Rice noodles
Nuts
Gelatine
Turmeric

Flavour
Olive oil
balsamic vinegar, red wine vinegar & white wine vinegar
Cheeses (soft, blue and goat)
Mostly cheese, rice, spices, ham
Seafood
Cheese and dairy
Confectionary
Prune juice concentrate for Fenhexamid
Cheese
Flavoured sauces and syrups for food, e.g. chocolate sauce, caramel sauce etc.
Zaatar
Seasonings for smallgoods production and condiments
Protein powder containing whey
Salmon
Drinks, flavoured teas/waters, alcohol, canned/ dried vegetables and fruits, cereal products, biscuits, rice, flour, fish, sugar, salt, coffee, tea, confectionery, chocolate, cocoa powder, sauces, seasonings, soups, ice pops, pasta, tapioca, cakes, breads, olive oil, vinegar, anchovies, sardines
Chocolate
Frozen Fruits and vegetables
Fresh fruits
Pomace Olive Oil
Processed sauces and food items.
Spices
Meat
Raw Fish
Spanish mackerel, fish fillets, squid, octopus
Fish

QE2. For the most recent consignment of food subjected to IFIS inspection (may or may not have included testing), what type of food (or foods) was inspected? Please be as specific as possible. Base: Those without a FICA (n=35)

4.4.3. Time taken to manage the IFIS inspection

In relation to the most recent consignment referred for IFIS inspection, respondents were asked to estimate the number of staff hours it took to manage this process. These estimates ranged from one hour through to 60 hours, while 57% did not know how many staff hours were required in managing this process. In this sample, respondents in small, medium and large businesses recorded a similar number of staff hours taken to manage the most recent IFIS inspection, with most falling into the 0-20 hours range. One respondent in a medium-sized business (20-199 employees) recorded the highest estimated hours (60 hours).

Time taken to manage IFIS inspection was also looked at by the number of consignments in the past 12 months subject to inspection. Unfortunately, many of the respondents indicated that they did not know the hours or consignment estimates. Most consignment quantities fell mostly within the 0-50 range, though as there are little data for the other groups a pattern cannot be ascertained.

Table 17: Time taken in hours to manage IFIS inspection for last consignment of food subject to inspection

Estimated hours to manage IFIS	<i>n</i>	%
1	6	17%
2	3	9%
4	1	3%
5	1	3%
6	1	3%
8	1	3%
16	1	3%
60	1	3%
Don't know	20	57%

QE3. For this most recent consignment of food subject to IFIS inspection, please indicate the estimated number of staff hours it took to manage the IFIS inspection process. Base: Those without a FICA (*n*=35)

Table 18: Time taken in hours to manage IFIS inspection for last consignment of food subject to inspection by business size (number of employees)

Hours	Small (0-19)	Medium (20-199)	Large (200 or more)
0-20	5	8	1
21-50	0	0	0
51-200	0	1	0
Don't know	9	4	7

QE3. For this most recent consignment of food subject to IFIS inspection, please indicate the estimated number of staff hours it took to manage the IFIS inspection process. Base: Those without a FICA (*n*=35); QA3. How many employees does your business have?

Table 19: Time taken in hours to manage IFIS inspection for last consignment of food subject to inspection by number of consignments of food subject to IFIS

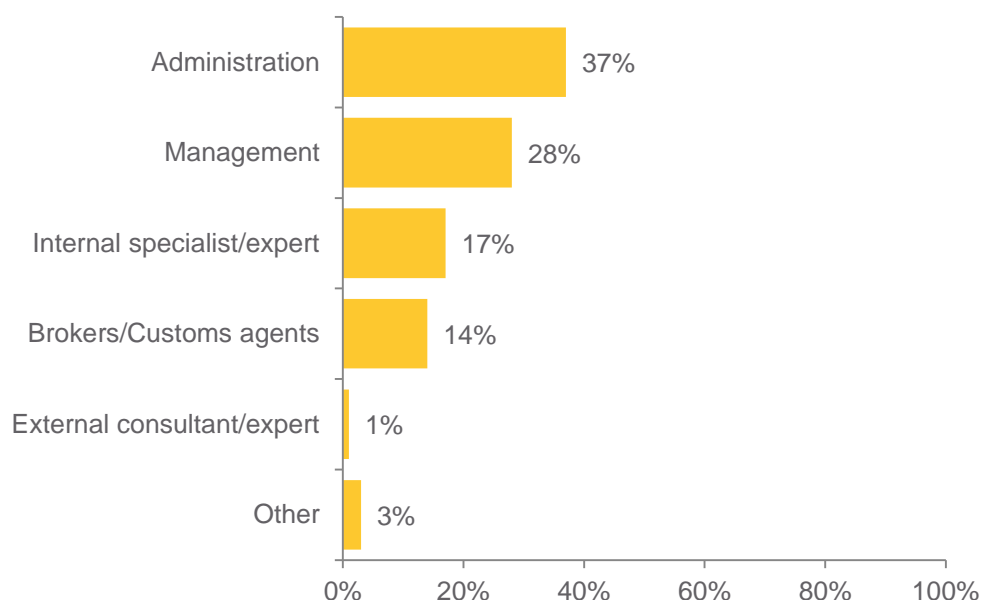
Hours	0-20 consignments	21-50 consignments	51-200 consignments	Don't know
0-20	7	6	1	0
21-50	0	0	0	0
51-200	0	0	0	1
Don't know	6	0	0	14

QE3. For this most recent consignment of food subject to IFIS inspection, please indicate the estimated number of staff hours it took to manage the IFIS inspection process. Base: Those without a FICA (*n*=35); QA3. How many employees does your business have? QE1. In the 12 months (1 April 2015 – 31 March 2016), approximately how many consignments of imported food were subject to the following inspection types?

4.4.4. Proportion IFIS management work undertaken by each staff type

These respondents were also asked what proportion of these hours taken to manage the latest consignment referred for IFIS inspection was undertaken by staff at a range of levels. Administration (37%) and management (28%) were the staff levels most commonly managing this process.

Figure 17. Proportion of time taken by staff type to manage IFIS inspection for last consignment of food subject to inspection



QE4. In percentage terms, approximately what proportion of this work was undertaken by the following staff levels? [For example, if all the work was undertaken by administrative staff, please allocate 100% against this level]. Base: Those not on an FICA (n=35)

Respondents who provided a portion against 'External consultant/expert' were asked to specify what type of specialist they used. Only one respondent selected this option, and gave a response of 'Broker'.

4.4.5. Delay at last IFIS inspection

To explore the impact of IFIS inspections on food importers, respondents were asked how long the most recent consignment of food referred for IFIS inspection was delayed at the point of entry (in hours). The delays caused ranged from 6 hours to 192 hours, with the most common delays cited being either 24 hours (11%) or 48 hours (11%). Some 51% of respondents asked this question didn't know how many hours the latest consignment referred for IFIS inspection was delayed. By business size, hours delayed were again fairly consistent across the groups, with the majority falling into the 21-50 hours range. Of note, the business reporting a 192 hour delay (8 days) was a small business (0-19 employees).

Table 20: Hours delay caused by most recent IFIS referral

Hours delayed	%	n
6	3%	1
24	11%	4
36	3%	1
45	3%	1
48	11%	4
96	3%	1
150	6%	2
160	6%	2

192	3%	1
Don't know	51%	18

QE6. For the most recent consignment of food that was referred for IFIS inspection (may or may not have included testing), how long was the consignment delayed at point of entry (or held within an approved premises)? Base: Respondents not currently on a FICA (n=35)

Table 21: Hours delay caused by most recent IFIS referral by business size (number of employees)

Hours	Small (0-19)	Medium (20-199)	Large (200 or more)
0-20	0	1	0
21-50	5	4	1
51-200	3	2	1
Don't know	6	6	6

QE6. For the most recent consignment of food that was referred for IFIS inspection (may or may not have included testing), how long was the consignment delayed at point of entry (or held within an approved premises)? Base: Respondents not currently on a FICA (n=35); QA3. How many employees does your business have?

4.5. Supplier assurance

4.5.1. Number of suppliers

Respondents were asked how many individual suppliers they had sourced food to import from over the 12 months to 31 March 2016. These ranged from just one supplier through to 400 suppliers. Medium to larger sized businesses (20-199 and 200+ employees) were observed to indicate higher numbers of individual suppliers used over the past 12 months.

Table 22: Number of individual suppliers used in the 12 months to 31 March 2016

Number of individual suppliers	%	n
1	10%	4
3	12%	5
5	5%	2
6	5%	2
18	2%	1
20	12%	5
30	5%	2
50	2%	1
55	2%	1
75	2%	1
150	2%	1
200	2%	1
250	2%	1
400	2%	1
Don't know	32%	13

QF0A. Approximately how many individual suppliers have you sourced food (to import) from over the past 12 months (1 April 2015 – 31 March 2016)? Base: All respondents (n=41)

4.5.2. Number of suppliers with safety management system certification

Across all respondents, 20 food importers were able to identify both how many individual suppliers they had used in the past 12 months, and how many of these that have specific food safety management certification (such as BRC global Standards, SQF, HACCP, ISO 9000, ISO 22000 etc.). The proportion of suppliers with food safety management certification ranged from 0% (albeit this was an importer sourcing food from one specific supplier who was not certified) through to 100%. Across this group, the average proportion of suppliers with food safety management certification was 89%., reflecting the fact that among both smaller and larger sized businesses most are sourcing food for import from suppliers with food safety management certification.

Table 23: Proportion of suppliers with food safety management system certification

Number of suppliers used in past 12 months	Number of these suppliers with food safety management certification	% with food safety management certification
1	0	0%
30	15	50%
3	2	67%
30	25	83%
75	65	87%
250	240	96%
1	1	100%
1	1	100%
3	3	100%
3	3	100%
3	3	100%
3	3	100%
5	5	100%
6	6	100%
18	18	100%
20	20	100%
20	20	100%
50	50	100%
150	150	100%
200	200	100%

QF0B. Among the [INSERT NUMBER FROM QF0A ABOVE] individual suppliers you have sourced food for import from over the past 12 months (1 April 2015 – 31 March 2016), please indicate the number of suppliers that have specific food safety management system certification (e.g. BRC Global Standards, SQF, HACCP, ISO 9000, ISO 22000, etc.) Base: Those who identified both total suppliers and number of certified suppliers (n=20)

When looking at those who indicated they had at least one supplier with safety management system certification, medium and large businesses by employee size indicated a slightly higher number of suppliers with certification, though it is important to note that these numbers closely resembled the numbers provided for total suppliers (at QF0A).

Table 24: Number of individual suppliers used in the 12 months to 31 March 2016 by business size (number of employees)

Suppliers with certification	Small (0-19)	Medium (20-199)	Large (200 or more)
0-20	8	6	4
21-50	1	0	1
51-200	0	2	2
201 or more	0	1	0
Don't know	6	7	3

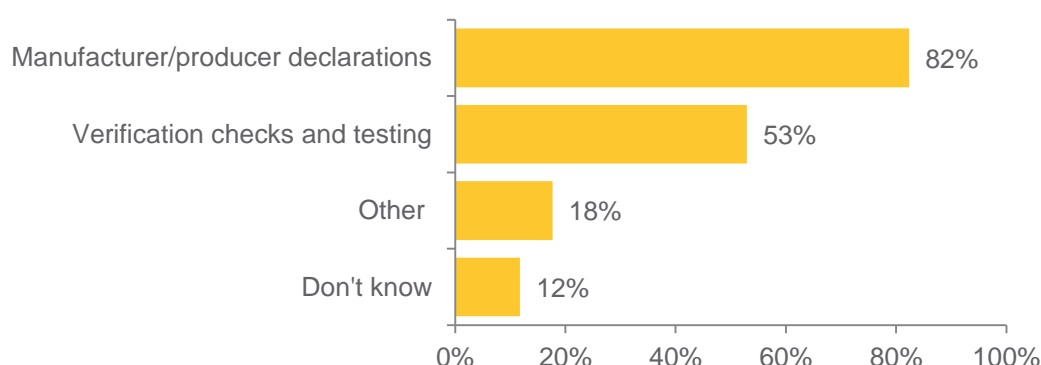
QF0B. Among the [INSERT NUMBER FROM QF0A ABOVE] individual suppliers you have sourced food for import from over the past 12 months (1 April 2015 – 31 March 2016), please indicate the number of suppliers that have specific food safety management system certification (e.g. BRC Global Standards, SQF, HACCP, ISO 9000, ISO 22000, etc.) Base: Those who identified both total suppliers and number of certified suppliers (n=20); QA3. How many employees does your business have?

4.5.3. Assurance that food imports comply with regulations

Those respondents who indicated that either all of their suppliers did not have food safety management system certification or didn't know if their suppliers held such accreditation were asked how they assure themselves that the food they are importing is compliant with the Food Standards Code and relevant food legislation. The majority of these said they relied on manufacturer or supplier declarations for this assurance (82%), while a further 53% said they achieved this through verification checks and testing. For the 18% (or 3 cases) identifying other ways of achieving such assurance, they cited the following:

- ▶ Import permit
- ▶ DAWR preclearance; and
- ▶ Official health certificates.

Figure 18. Obtaining assurance that food imports comply with the Food Standards Code

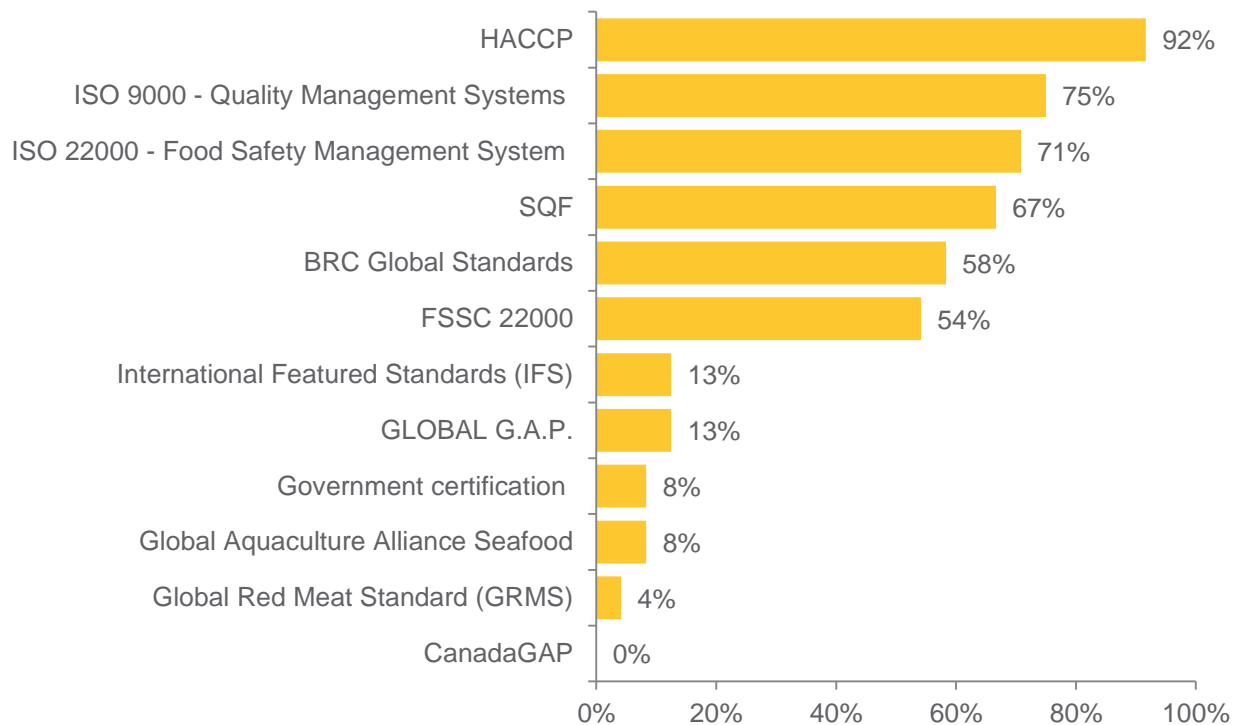


QF0C. How do you obtain assurance that the food you are importing is compliant with the Food Standards Code and relevant food legislation? Please select all that apply. Base: Respondents not providing a number of suppliers at QF0B (n=17)

4.5.4. Food safety management systems accepted

Respondents were asked to indicate which food safety management systems they accept as the basis of assurance from their suppliers. HACCP (92%), ISO 9000 (75%) and ISO 22000 (71%) were the most commonly identified systems accepted.

Figure 19. Food safety management systems accepted as the basis of assurance from suppliers



QF2. What food safety management systems do you accept as the basis of assurance from suppliers? Please select all that apply. Base: Respondents who did provide a number of suppliers at QF0B (n=24)

4.5.5. Number of suppliers with and without certification

Those importing higher risk foods were asked both how many suppliers they dealt with in the provision of these foods for import over the past three years, and also how many of these either had or did not have food safety management system certification.

Across all higher risk food types, the only products being sourced from suppliers without food safety management certification were raw or frozen bivalve molluscs (5 suppliers without certification out of 25 suppliers of these products in total) and raw ready to eat nuts (5 suppliers out of 83 suppliers of these products in total).

Table 25: Number of suppliers with and without certification imported from in last three years by higher-risk food type

	Total number of suppliers with food safety management system certification	Total number of suppliers without food safety management system certification
Beef and beef products	2	0
Raw pork	20	0
Raw or frozen bivalve molluscs	20	5
Ready-to-eat minimally processed finfish	206	0
Raw milk cheese	4	0
Raw ready-to-eat fresh or frozen vegetables	2	0
Raw ready-to-eat fresh or frozen fruit	3	0
Raw ready-to-eat nuts	78	5
Semi-dried tomatoes	0	0

QF3A. For the following food types that you have imported over the past three years (1 April 2013 – 31 March 2016), please indicate the number of suppliers: with food safety management system certification (including any of those systems mentioned in the previous question); and without food safety management system certification. Base: Respondents who indicated their business imported a high-risk food product in past three years (n=14)

Across the 41 respondents to the survey, there were only two businesses that indicated importing a high risk food from a supplier without food safety management system certification – one importing raw or frozen bivalve molluscs, and one importing ready to eat nuts. Both of these businesses employed between 20 and 199 employees and indicated that food importing accounted for more than 70% of their total business operations.

4.5.6. Time taken to ensure suppliers comply with regulations

Respondents were asked about the process of taking on a new supplier of foods for import into Australia. Specifically, food importers were asked how many hours it took for them to be assured that the most recently engaged supplier's food product/s would meet the Food Standards Code and relevant food legislation. Estimated hours ranged from one hour to 120 hours, while a quarter of respondents couldn't provide an estimate. Among those providing an estimate, the majority fell within the 1-20 hour range, and there were few notable differences observed by business size or other importer characteristics.

Table 26: Time taken in hours to ensure most recently engaged supplier's food would meet the Food Standards Code

Hours	%	n
1	17%	4
3	4%	1
5	8%	2
6	4%	1
8	4%	1
10	8%	2
12	4%	1
15	4%	1
20	8%	2
30	4%	1
38	4%	1
120	4%	1
Don't know	25%	6

QF4. For the most recently engaged new supplier, please estimate approximately how many hours it took for your business to be assured this supplier's food would meet the Food Standards Code and relevant food legislation? Base: Respondents who did provide a number of suppliers at QF0B (n=24)

Table 27: Time taken in hours to ensure most recently engaged supplier's food would meet the Food Standards Code by business size (number of employees)

Hours	Small (0-19)	Medium (20-199)	Large (200 or more)
0-20	6	6	3
21-50	1	0	1
51-200	0	0	1
Don't know	1	3	2

QF4. For the most recently engaged new supplier, please estimate approximately how many hours it took for your business to be assured this supplier's food would meet the Food Standards Code and relevant food legislation? Base: Respondents who did provide a number of suppliers at QF0B (n=24); QA3. How many employees does your business have?

4.5.7. Time taken to maintain food safety management system records

Those respondents with at least one supplier holding food safety management system accreditation were asked approximately how many hours it takes annually to maintain food safety management system assurance records for all accredited suppliers (including all relevant aspects such as certification checks, verifications, internal audits etc.). Estimates of time taken for this process ranged from one hour to 2080 hours (this was a business with 200+ employees who didn't know the exact volume of consignments imported over the preceding 12 months). Larger businesses were more commonly observed providing larger time estimates, as were businesses that identified food importing making up 70% of more off their total business operations.

Table 28: Hours taken to maintain food safety management system assurance records annually

Hours	%	n
1	4%	1
3	4%	1
8	4%	1
10	8%	2
20	4%	1
30	4%	1
38	4%	1
48	4%	1
50	4%	1
100	8%	2
160	4%	1
350	4%	1
400	4%	1
600	4%	1
1000	4%	1
2080	4%	1
Don't know	25%	6

QF5. Approximately how much time (in hours) does it take annually to maintain food safety management system assurance records (for all suppliers)? Please include the estimated time taken to conduct all relevant aspects, e.g. certification checks, verifications, internal audits etc. Base: Respondents who did provide a number of suppliers at QF0B (n=24)

Table 29: Hours taken to maintain food safety management system assurance records annually by business size (number of employees)

Hours	Small (0-19)	Medium (20-199)	Large (200 or more)
0-20 hours annually	2	3	1
21-50 hours annually	2	1	1
51-200 hours annually	2	0	1
201-1000 hours annually	0	3	1
1001 or more hours annually	0	0	1
Don't know	2	2	2

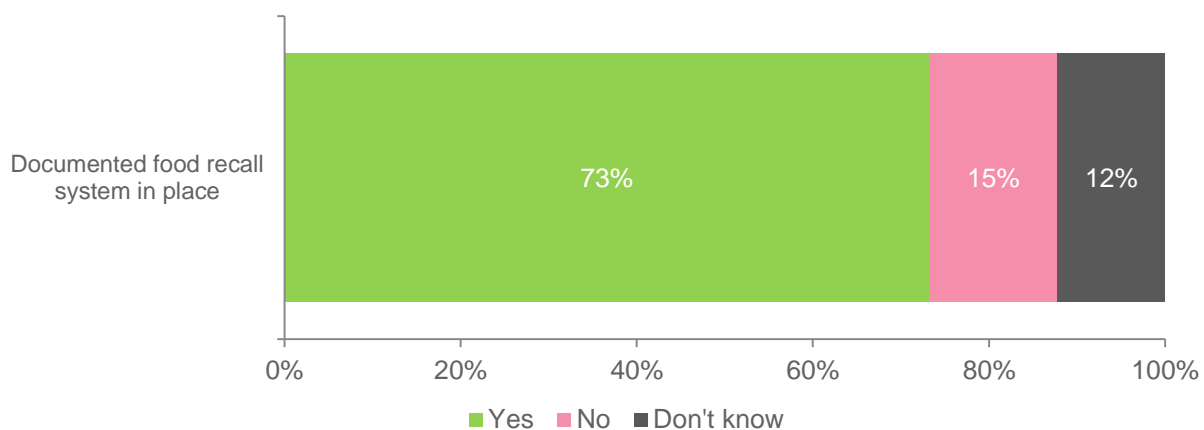
QF5. Approximately how much time (in hours) does it take annually to maintain food safety management system assurance records (for all suppliers)? Please include the estimated time taken to conduct all relevant aspects, e.g. certification checks, verifications, internal audits etc. Base: Respondents who did provide a number of suppliers at QF0B (n=24); QA3. How many employees does your business have?

4.6. Traceability

4.6.1. Existence of documented food recall system

Respondents were asked if they have a documented food recall system in place. Some 73% of survey respondents said they had such a system in place, 15% said they did not and 12% were unsure. In percentage terms, similar levels of medium and large businesses recorded having a documented food recall system in place (81% and 80% respectively), with fewer respondents (at 60%) from small businesses reporting having such a system in place. Similarly, those businesses that reported food importing being 20% or less of their total business operations were generally less likely to have such a system in place.

Figure 20. Documented food recall system in place



QG1. Does your business have a documented (e.g. written) food recall system in place? Base: All respondents (n=41)

Table 30: Businesses with a documented food recall system in place by business size (number of employees)

	Small (0-19)	Medium (20-199)	Large (200 or more)
Yes	60%	81%	80%
No	33%	0%	10%
Don't know	7%	19%	10%

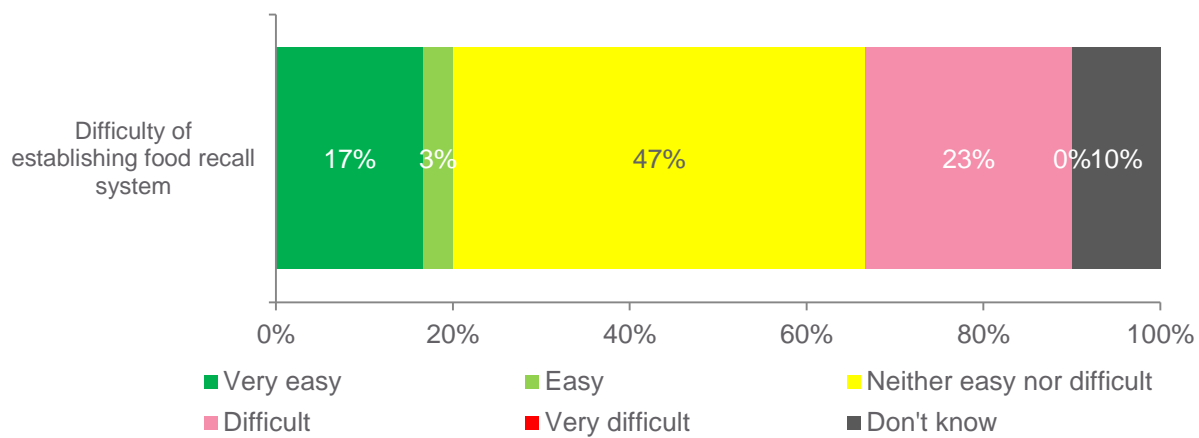
QG1. Does your business have a documented (e.g. written) food recall system in place? Base: All respondents (n=41);

QA3. How many employees does your business have?

4.6.2. Difficulty of establishing documented food recall system

Those with a food recall system in place were asked how easy or difficult it was for them to establish this system. Most respondents described this process as 'neither easy nor difficult' (47%), followed by 'difficult' (23%).

Figure 21. Difficulty of establishing the documented food recall system



QG2. How easy or difficult was it for your business to establish a documented food recall system? Base: Those who have a food recall system in place (n=30)

4.6.3. Time taken to establish documented food recall system

Those with a documented food recall system in place were asked to estimate how long it took (in hours) to initially establish the system. Estimates on the length of time for this process ranged from two hours through to 180 hours, while half of those with a food recall system in place didn't know how long it took to establish.

Table 31: Time taken to establish documented food recall system

Hours	%	n
2	7%	2
3	3%	1
5	7%	2
10	10%	3
24	7%	2
65	3%	1
100	7%	2
120	3%	1
180	3%	1
Don't know	50%	15

QG3A. Can you provide an estimate of the time in hours it took to initially establish the documented (e.g. written) food recall system? Base: Respondents with a documented food recall system in place (n=30)

By business size, responses in this sample showed a slight tendency for larger businesses to take longer to establish the food recall system than small businesses, though small and medium businesses did record estimates in the 51-200 hour range. No differences were apparent by whether Australian-based or not or by import locations.

Table 32: Time taken to establish documented food recall system in hours by business size (number of employees)

Hours	Small (0-19)	Medium (20-199)	Large (200 or more)
0-20	4	3	1
21-50	1	1	0
51-200	1	2	2
Don't know	3	7	5

QG3A. Can you provide an estimate of the time in hours it took to initially establish the documented (e.g. written) food recall system? Base: Respondents with a documented food recall system in place (n=30); QA3. How many employees does your business have?

These respondents were also asked what the main barriers or challenges of establishing a documented food recall system were. While the range of answers given varied, the most common themes were the challenge of dealing with multiple stakeholders at the federal and state level, and a perceived lack of guidance on the process of establishing such a system.

Table 33: Barriers or challenges associated with establishing a documented food recall system

Response
Time taken and complicated state and federal responsibilities.
There is nothing specific to the industry off the shelf, we had to write everything ourselves.
Language, Terms and Conditions required by different department. Rules change over time with little notification.
Nothing really, just ensuring that everything was covered so that it could be tested under a variety of conditions.
The time taken for a number of individual departments which then had to be collated into one procedure.
Finding a template that can be modified for our use
Working the system within the GMP requirements for medicines.
Ensure the recall covered all contingencies
Batch tracking.
Company red tape
Education
Reliance on 3rd parties (warehouse, contract manufacturers, suppliers), training and mock recall.
Understanding the key persons responsible, timeframe for reporting to the state department and FSANZ recalls, how to maintain communication lines with the government
Getting supplier buy in but once this was achieved, it was no issue at all. Suppliers welcome the structure and rigidity we apply to all our processes and controls.
Established by the Safety Health & Quality Manager so unable to comment further
Our food recall system has evolved over time and has been in place for approximately 25 years. Over time through internal audits we have ensured that our food recall system remains current. The estimated time for an internal audit of our food recall system is approximately 8 hours. This is an internal audit only not a mock recall.
Conducting a successful mock recall with other departments
Lack of knowledge
Lack of clear and easy to understand information from government bodies.
Traceability, Supplier Risk Assessment, language
Establishing a traceability system
GS1 interaction
Just making sure it was compliant with the process spelt out by FSANZ

A 3rd party manages our warehousing and distribution part of the business and they have a documented food recall system in place
Recall withdrawal systems are part of Woolworths Coles quality requirements which we must participate

QG3B. What were the main barriers or challenges associated with establishing a documented food recall system? Base: Respondents giving an answer of 'Yes' at QG1 (n=30). Nil and 'Don't know' responses are not shown.

4.6.4. Time taken to maintain documented food recall system

Those with an established food recall system in place were asked how much time (in hours) it takes to maintain the system on an annual basis. Responses ranged from one hour to 60 hours per annum, while 27% indicated they didn't know.

Table 34: Hours required annually to keep documented food recall system up to date

Hours	%	n
1	13%	4
2	3%	1
4	7%	2
8	7%	2
10	3%	1
15	10%	3
20	10%	3
25	3%	1
30	7%	2
34	3%	1
40	3%	1
60	3%	1
Don't know	27%	8

QG4. Approximately how much time does it take annually to keep your documented food recall system up to date?
Base: Respondents with a documented food recall system in place (n=30).

By business size, responses again showed a slight tendency for larger businesses to require more hours to maintain their food recall system annually than small businesses. No differences were apparent by whether Australian-based or not or by import locations within Australia.

Table 35: Hours required annually to keep documented food recall system up to date by business size (number of employees)

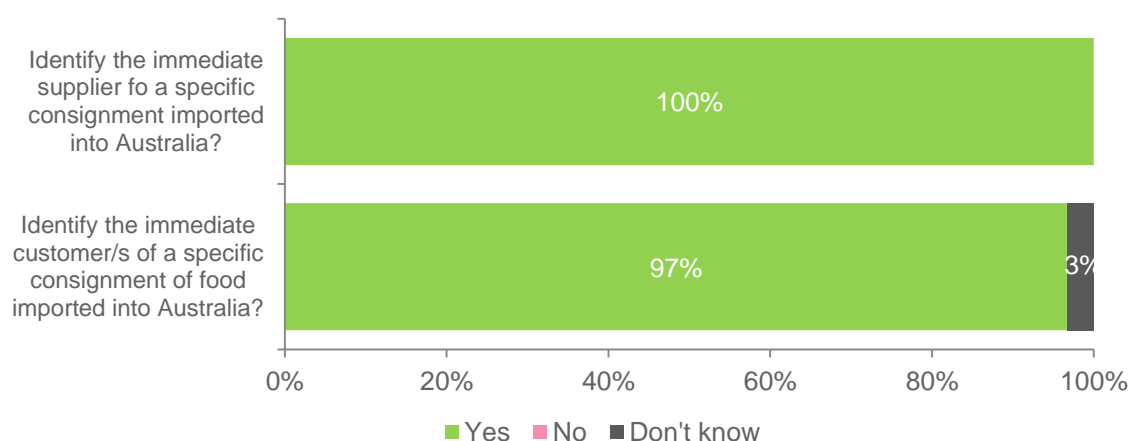
Hours	Small (0-19)	Medium (20-199)	Large (200 or more)
0-20	7	7	2
21-50	0	2	3
51-200	1	0	0
Don't know	1	4	3

QG4. Approximately how much time does it take annually to keep your documented food recall system up to date?
Base: Respondents with a documented food recall system in place (n=30); QA3. How many employees does your business have?

4.6.5. Food recall system functionality

Respondents were asked if their food recall system had the ability to identify the immediate supplier of a specific consignment of food into Australia, and also if it could identify the immediate customer/s of a specific consignment of food imported into Australia. Encouragingly, nearly all of those with food recall systems in place said their system allows for both of these functions (100% for identifying suppliers, and 97% for identifying customers).

Figure 22. Ability of food recall system to identify immediate supplier and customer/s of consignments imported into Australia



QG5. Does your food recall system have the ability to... Base: Respondents with a food recall system in place (n=30).

4.6.6. Estimated time required to identify suppliers of food imports

Those with a food recall system in place were asked approximately how long it would take them (in hours) for their business to identify the immediate supplier of a specific consignment of food imported into Australia. Encouragingly, most indicated this would take only one hour (77%).

Table 36: Estimated time required by business to identify the immediate supplier of a consignment of food imported into Australia

Hours	%	n
1	77%	23
2	7%	2
3	3%	1
4	3%	1
24	3%	1
Don't know	7%	2

QG6A. If requested, approximately how long would it take (in hours) for your business to identify the immediate supplier of a specific consignment of food imported into Australia? Base: Respondents with a food recall system in place (n=30).

No differences were apparent in hours required to identify the immediate supplier of a consignment of food imported into Australia by business size, with the majority of respondents indicating an estimate in the 0-20 hours range.

Table 37: Estimated time required by business to identify the immediate supplier of a consignment of food imported into Australia by business size (number of employees)

Hours	Small (0-19)	Medium (20-199)	Large (200 or more)
0-20	9	11	7
21-50	0	0	1
Don't know	0	2	0

QG6A. If requested, approximately how long would it take (in hours) for your business to identify the immediate supplier of a specific consignment of food imported into Australia? Base: Respondents with a food recall system in place (n=30); QA3. How many employees does your business have?

4.6.7. Estimated time required to identify customers of food imports

Similarly, those with a food recall system in place were also asked approximately how long it would take them (in hours) for their business to identify the immediate customer/s of a specific consignment of food imported into Australia. Two thirds of these respondents suggested they would be able to provide this information within one hour.

Table 38: Estimated time required by business to identify the immediate customer/s of a consignment of food imported into Australia

Hours	%	n
1	67%	20
2	7%	2
3	3%	1
4	3%	1
8	3%	1
10	3%	1
24	3%	1
Don't know	10%	3

QG6B. If requested, approximately how long would it take (in hours) for your business to identify the immediate customer/s of a specific consignment of food imported into Australia? Base: Respondents with a food recall system in place (n=30).

Similar to hours taken to identify the immediate supplier of a consignment of food, no differences were apparent in hours required to identify the immediate customer by business size, the majority of respondents again indicating an estimate in the 0-20 hours range.

Table 39: Estimated time required by business to identify the immediate supplier of a consignment of food imported into Australia by business size (number of employees)

Hours	Small (0-19)	Medium (20-199)	Large (200 or more)
0-20	9	10	7
21-50	0	1	0
Don't know	0	2	1

QG6B. If requested, approximately how long would it take (in hours) for your business to identify the immediate customer/s of a specific consignment of food imported into Australia? Base: Respondents with a food recall system in place (n=30); QA3. How many employees does your business have?

4.6.8. Difficulty of establishing food recall system

Those without a documented food recall system in place were asked how easy or difficult they thought it would be to establish such a system for their food importing activities. Across the 11 respondents, most thought such a task would be 'neither easy nor difficult' or they 'don't know'.

Table 40: Difficulty of establishing food recall system

	<i>n</i>
Very easy	1
Easy	1
Neither easy nor difficult	4
Difficult	0
Very difficult	0
Don't know	5

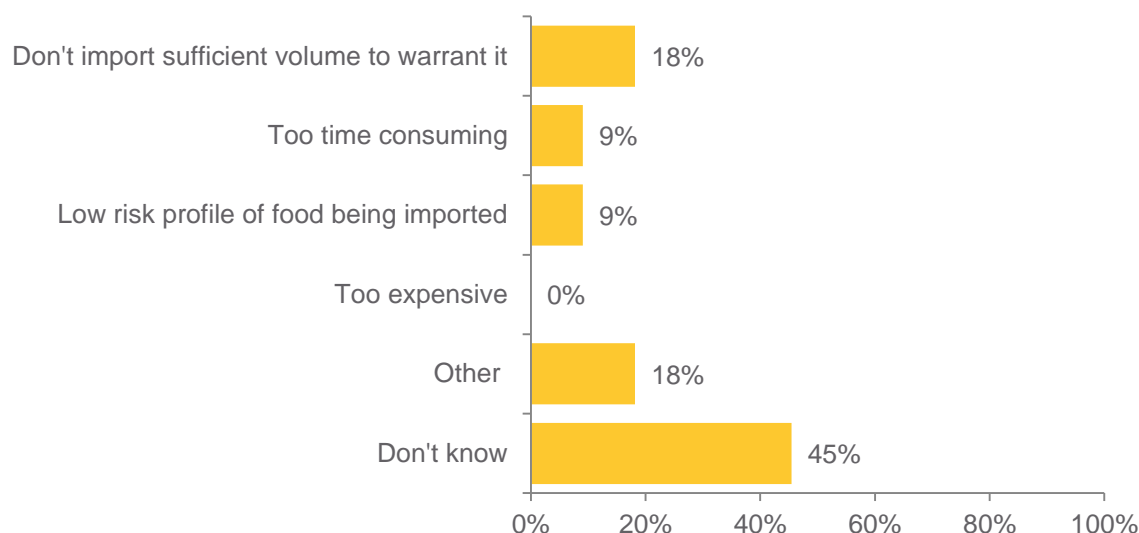
QG7. How easy or difficult would it be for your business to establish a documented (e.g. written) food recall system?

Base: Those without a documented food recall system (n=11).

4.6.9. Reasons for not establishing a food recall system

Those currently without a documented food recall system were asked the main reason they currently don't have one. Most replied that they 'didn't know' (45%), followed by 'don't import sufficient volume to warrant it' (18%).

Figure 23. Main reasons for not establishing a documented food recall system



QG8. What is the main reason your business does not have a documented (e.g. written) food recall system for the food you import? Base: Those without a documented food recall system (n=11).

5. Appendix A: Sample profile

5.1. Food importing as proportion of all business activity

Food importing as a proportion of all business activities of respondents ranged from a high of 100% of all business activity (4 businesses) through to a low of 0% (2 businesses). Across the broader sample, food importing made up an average of just over half of all business activity.

Those who indicated that food importing did not make up 100% of their business were asked the main industry sector of the other activities of their business. Wholesale trade was the most common non-food importing activity (30% of those where food importing does not make up 100% of the business activity), followed by manufacturing (22%), and retail trade (14%).

Table 41: Main business activity

Proportion of overall business that is food Importing (%)	Proportion of overall business that is not food importing (%)	Other business industry type
100	0	N/A
100	0	.N/A
100	0	.N/A
100	0	.N/A
98	2	Manufacturing
95	5	Agriculture, Forestry and Fishing
90	10	Wholesale Trade
90	10	Manufacturing
90	10	Manufacturing
90	10	Wholesale Trade
90	10	Transport, postal and warehousing
90	10	Agriculture, Forestry and Fishing
85	15	Wholesale Trade
80	20	Manufacturing
80	20	Retail Trade
70	30	Accommodation and food services
60	40	Manufacturing
60	40	Wholesale Trade
60	40	Wholesale Trade
50	50	Information media and telecommunications
40	60	Agriculture, Forestry and Fishing
40	60	Manufacturing
40	60	Manufacturing
40	60	Wholesale Trade

40	60	Manufacturing
40	60	Wholesale Trade
40	60	Wholesale Trade
30	70	Retail Trade
30	70	Retail Trade
30	70	Wholesale Trade
30	70	Retail Trade
30	70	Transport, postal and warehousing
20	80	Transport, postal and warehousing
20	80	Wholesale Trade
15	85	Wholesale Trade
10	90	Other
5	95	Retail Trade
2	98	Transport, postal and warehousing
1	99	Other
0	100	Agriculture, Forestry and Fishing
0	100	Other

QA1. Approximately what proportion of your overall business is food importing? Base: All respondents (n=41); QA2 What is the main industry sector of your business apart from food importing? Base: All respondents (n=41).

5.2. Employee size

Table 42: Number of employees

	%	n
None	5%	2
1-4	12%	5
5-19	20%	8
20 - 199	39%	16
200 or more	24%	10
Don't know	0%	0

QA3. How many employees does your business have? Base: All respondents (n=41)

Table 43: Business size by number of employees

	%	n
Small (0-19 employees)	37%	15
Medium (20-199 employees)	39%	16
Large (200 or more employees)	24 %	10

QA3. How many employees does your business have? Base: All respondents (n=41)

5.3. Business locations

Table 44: Single or multiple locations

	%	n
Single location	41%	17
Multiple locations	59%	24
Don't know	0%	0

QA4. Does your business operate in a single location or across multiple locations within Australia? Base: All respondents (n=41)

Table 45: Location of business base

	%	n
Yes - Australian based	83%	34
No - business based elsewhere	17%	7
Don't know	0%	0

QA5. Is this an Australian-based business? Base: All respondents (n=41)

Table 46: Locations of business based outside of Australia

Head office locations	n
Germany	3
Ireland	1
Japan	2
Switzerland	1

QA6. In which country is the head office of your business located? Base: Respondents in businesses based outside of Australia (n=7)

Table 47: Locations of food importing operations in Australia

	%	n
Sydney	54%	22
Melbourne	49%	20
Brisbane	39%	16
Perth	32%	13
Adelaide	24%	10
QLD other	7%	3
VIC other	7%	3
NSW other	5%	2
Darwin	2%	1
Hobart	2%	1
SA other	2%	1
WA other	2%	1
ACT	0%	0
NT other	0%	0
TAS other	0%	0

QA7. In which of the following Australian locations do you have food importing operations? Select all that apply. Base: All respondents (n=41)

5.4. State-based food licensing

Table 48: Proportion licensed as a food business by state or territory

Row %	Yes
New South Wales	46%
Victoria	44%
Queensland	41%
South Australia	22%
Western Australia	20%
Tasmania	10%
Northern Territory	10%
ACT	12%

QA8. Is your business licensed and/or registered as a food business with the state or territory government authority or local council in any of the following jurisdictions? Base: All respondents (n=41)

Table 49: Total licensed as a food business

	%
Licensed or registered	80%
Not licensed / Don't know	20%

QA8. Is your business licensed and/or registered as a food business with the state or territory government authority or local council in any of the following jurisdictions? Base: All respondents (n=41)

5.5. Peak body membership

Table 50: Membership to any Australian peak body or industry association

	%	n
Yes	41%	17
No	39%	16
Not sure	20%	8

QA9. Is your business a member of any Australian peak body or industry association covering food importing? Base: All respondents (n=41)

Table 51: Industry associations

Verbatim responses
AQIS / Imported foods compliance agreements
CBFCA FTA
FBIA
FBIA

FBIA IFCC
Food & Beverage Importers Association
Food & Beverage Importers Association
Food & Beverage Importers Association
Food and Beverage Importers Association Australian Olive Oil Association
HECCP
Our business uses a broker
Pork and Ausmeat
Seafood Importers Association of Australasia
Seafood Importer's Association of Australia (SIAA)
Seafood Importers Association of Australia Inc
SSIA
VFFMA

QA10. Which industry associations or peak bodies covering food importing is your business a member of? Base: Respondents who indicated membership of peak body or association (n=17)

6. Appendix B: Questionnaire

Food Importers Survey – Department of Agriculture & Water Resources

SURVEY INTRODUCTION

The Australian government – through the Department of Agriculture & Water Resources - is looking into the management of imported food to strengthen the ability to identify, respond to and manage food safety risks and seeks the input of Australian-based food importers to inform this work.

We have engaged Colmar Brunton - an independent research organisation that conducts projects on behalf of the Government and other organisations – to undertake this survey on our behalf. Your **contact details and any responses** you give in this survey will be **treated confidentially**. Your responses will not be personally linked to you or your organisation as they will be combined with all other responses and used only for research purposes or as required/authorised by law.

The survey is expected to take no longer than 20 minutes to complete, and this is your opportunity to ensure the voice of food importers is heard and considered.

For this survey, we are seeking input from those persons with primary responsibility for the business meeting its regulatory obligations for compliance with the Food Standards Code and imported food legislation.

The survey will ask for best estimates with regards to a number of time frames and some dollar values, as such larger organisations may need to engage with other departments or teams about information and experience to complete the survey.

Note that the responses you provide during the survey will be saved as you go. If you need to close the survey part-way through, just click on the survey link we emailed you and the survey should re-open at the point you were up to previously.

If you have any questions about the survey topic, please contact the Imported Food Reform Section at [foodimp@agriculture.gov.au] or call 1800 900 090.

If you experience any technical difficulties when undertaking the survey, please contact Colmar Brunton at [surveys@colmarbrunton.com].

Please click on “next” to enter the survey.

SECTION B: INDIVIDUAL PROJECT REQUIREMENTS

PART A. – About your business

QA1. Approximately what proportion of your overall business is food importing?

A	Food importing	[INSERT %]
B	Other activities	[INSERT %]
	TOTAL	[MUST ADD TO 100%]

IF QA1B=0, SKIP TO QA3 BELOW. OTHERWISE CONTINUE

QA2. What is the main industry sector of your business apart from food importing?

	Code
Agriculture, Forestry and Fishing	1
Mining	2
Manufacturing	3
Electricity, Gas, Water and waste services	4
Construction	5
Wholesale Trade	6
Retail Trade	7
Accommodation and food services	8
Transport, postal and warehousing	9
Information media and telecommunications	10
Finance and Insurance services	11
Rental, hiring and real estate services	12
Professional, scientific and technical services	13
Administration and support services	14
Public administration and safety	15
Education and training	16
Health care and social assistance	17
Arts and recreation services	18
Other – please SPECIFY	96

QA3. How many employees does your business have?

	Code
None	1
1 – 4	2
5 – 19	3

20 – 199	4
200 or more	5
Don't know	97

QA4. Does your business operate in a single location or across multiple locations within Australia?

	Code
Single location	1
Multiple locations	2
Don't know	97

QA5. Is this an Australian-based business?

	Code
Yes – Australian based	1
No – business based elsewhere	2
Don't know	97

IF QA5=2, CONTINUE TO QA6 BELOW. OTHERWISE SKIP TO QA7.

QA6. In which country is the head office of your business located?

OPEN TEXT BOX

QA7. In which of the following Australian locations do you have food importing operations? Please select all that apply.

	Code
Sydney	1
NSW other	2
Melbourne	3
VIC other	4
Brisbane	5
QLD other	6
Adelaide	7
SA other	8
Perth	9
WA other	10
Darwin	11
NT other	12
Hobart	13
TAS other	14
ACT	15

QA8. Is your business licensed and/or registered as a food business with the state or territory government authority or local council in any of the following jurisdictions?

	Yes	No	Don't know
New South Wales	1	2	97
Victoria	1	2	97
Queensland	1	2	97
South Australia	1	2	97
Western Australia	1	2	97
Tasmania	1	2	97
Northern Territory	1	2	97
ACT	1	2	97

QA9. Is your business a member of any Australian peak body or industry association covering food importing?

	Code
Yes	1
No	2
Not sure	3

IF QA9=1, CONTINUE TO QA10. OTHERWISE SKIP TP QB1 BELOW.

QA10. Which industry associations or peak bodies covering food importing is your business a member of?

OPEN TEXT BOX

PART B. Food importing activities

QB1. Which of the following types of foods did your business import in the past 3 years (1 April 2013 – 31 March 2016)? Please select all that apply.

Broad food classification	Sub classification	Code
Meat	Raw meat	1
	Cooked meat (chilled, frozen, sliced, diced, marinated or flavoured)	2
	Retorted/canned meat	3
	Processed/manufactured meat	4
	Offal product (e.g. Pâté)	5
	Other meat products (not listed above)	6
Seafood	Fish (whole or filleted), fresh, chilled, frozen	7
	Fish dried, salted or in brine, smoked	8
	Crustaceans	9
	Molluscs	10
	Aquatic invertebrates (other than crustaceans and molluscs listed above)	11
	Retorted/canned seafood	59
	Other seafood products (not listed above)	12
Dairy	Milk (including dried, evaporated and condensed and ambient stable)	13

Broad food classification	Sub classification	Code
	Cream (including ambient stable)	14
	Buttermilk, curdled milk and cream, yoghurt and other fermented or acidified milk and cream	15
	Whey	16
	Butter and other fats and oils derived from milk; dairy spreads	17
	Cheese and curd	18
	Products with more than 10% dairy content	57
	Other dairy products (not listed above)	64
Eggs	Egg and egg products	20
	Products with more than 10% egg content	58
Edible oils		21
Vegetables	Fresh or chilled vegetables	22
	Frozen vegetables	23
	Preserved vegetables (e.g. Pickled)	24
	Dried vegetables	25
	Canned/retorted vegetables	26
	Processed vegetables	56
	Other vegetables (not listed above)	27
Fruits	Fresh fruit	28
	Frozen fruit	29
	Preserved fruit	30
	Dried fruit	31
	Canned/retorted fruit	32
	Processed fruit	33
	Other fruits (not listed above)	34
Pasta	Dried pasta (wheat)	60
	Dried pasta (egg)	61
	Fresh pasta (wheat)	62
	Fresh pasta (egg)	63
Nuts and nut products		35
Seaweed		36
Coffee		37
Tea		38
Seeds		39
Spices, condiments		40
Sugar, honey and other sweeteners		41
Salt		42
Vinegar		43
Jams, spreads		44
Alcoholic beverages		45
Non-alcoholic beverages		46
Confectionery (including chocolate)		47
Cereals and cereal products		48
Processed snack foods (including chips, fruit bars, etc.)		65
Bakery products		49
Soups		50
Sauces (including vegetable based, hot sauces, flavourings)		51
Chewing gum		52
Foodstuffs intended for particular nutritional purposes	Includes infant formula and food for infants, formulated meal replacements and formulated supplementary foods, formulated supplementary sports foods, food for	53

Broad food classification	Sub classification	Code
	special medical purposes	
Other processed foods including mixed foods		54
Food additives/processing aids		55
Any other food not mentioned above	SPECIFY	96

QB2A. Has your business imported any of the following higher risk food types in the past three years (1 April 2013 – 31 March 2016)?

	Food description	Yes	No	Don't know
A	Beef and beef products	1	2	97
B	Raw pork	1	2	97
C	Raw or frozen bivalve molluscs (e.g. clams, cockles, mussels, oysters, pipi and scallops) that may be eaten without being cooked	1	2	97
D	Ready-to-eat minimally processed finfish (e.g. cold smoked salmon)	1	2	97
E	Raw milk cheese (i.e. cheese with no form of heat treatment)	1	2	97
F	Raw ready-to-eat* fresh or frozen vegetables (e.g. snow peas). If yes, please specify	1 [SPECIFY]	2	97
G	Raw ready-to-eat* fresh or frozen fruit (e.g. frozen berries). If yes, please specify	1 [SPECIFY]	2	97
H	Raw ready-to-eat* nuts (i.e. shelled and unroasted). If yes, please specify	1 [SPECIFY]	2	97
I	Semi-dried tomatoes (excluding those in hermetically sealed packages)	1	2	97

* **Ready-to-eat** is food that is ordinarily consumed in the same condition as that in which it is sold or distributed, in this instance it includes fruits, vegetables or nuts that are intended to be eaten without being cooked. It excludes whole fruits, vegetables and nuts in the shell intended to be peeled or hulled before being consumed.

IF YES TO ANY OF QB2A A, B, C, D, E, F, G, H, OR I, CONTINUE TO QB2B BELOW. OTHERWISE SKIP TO QB3.

QB2B. Which country or countries do you import the following foods from?
[TABLE BELOW TO SHOW ALL FOODS INDICATED AT QB2]

Food type	Country	Don't know
Food Type 1	[DROP DOWN LIST OF ALL COUNTRIES – SELECT AS MANY AS APPLY FOR THIS FOOD]	97
Food Type 2	[DROP DOWN LIST OF ALL COUNTRIES – SELECT AS MANY AS APPLY FOR THIS FOOD]	97
Food Type 3	[DROP DOWN LIST OF ALL COUNTRIES – SELECT AS MANY AS APPLY FOR THIS FOOD]	97
Food Type 4	[DROP DOWN LIST OF ALL COUNTRIES – SELECT AS MANY AS APPLY FOR THIS FOOD]	97
Food Type 5	[DROP DOWN LIST OF ALL COUNTRIES – SELECT AS MANY AS APPLY FOR THIS FOOD]	97

QB3. Over the past 12 months (1 April 2015 – 31 March 2016) how frequently have you imported foods into Australia?

Weekly	Fortnightly	Monthly	Quarterly	Every 6 months	Annually	Less than annually	Don't know
1	2	3	4	5	6	7	97

QB4. Over the past 12 months (1 April 2015 – 31 March 2016), approximately how many consignments of food has your business imported into Australia?

Estimated number of consignments of food imported into Australia	Don't know
[ENTER NUMBER]	99999999

QB5A. Over the past 12 months (1 April 2015 – 31 March 2016), what was the approximate total Australian dollar value of all foods you imported into Australia?

Total value of food imports into Australia (in Australian dollars)	Don't know
[ENTER NUMBER]	99999999

QB5B. Over the past 12 months (1 April 2015 – 31 March 2016), what was the estimated **average time (in hours) per week** it took your business to ensure food imported into Australia was compliant with the Food Standards Code and related food legislation? Please include hours billed to Brokers and other external consultants/experts.

NOTE: This excludes time taken to ensure compliance with biosecurity or quarantine requirements.

Average hours per week	Don't know
[ENTER NUMBER]	99999999

IF QB5B=DON'T KNOW, SKIP TO QC1 BELOW. OTHERWISE CONTINUE.

QB5C. At the previous question you indicated that it took on average [INSERT AVERAGE HOURS FROM QB5B HERE] hours per week to ensure food imported into Australia was compliant with the Food Standards Code and related food legislation (excluding for compliance with quarantine/biosecurity requirements).

In percentage terms, approximately what proportion of this work is undertaken by the following staff levels? [For example, if all the work is undertaken by administrative staff, please allocate 100% against this level]

CODE		Proportion
1	Management	[INSERT % BETWEEN 0% AND 100%]
2	Administration	[INSERT % BETWEEN 0% AND 100%]
3	Internal specialist/expert	[INSERT % BETWEEN 0% AND 100%]
4	Brokers/Customs agents	[INSERT % BETWEEN 0% AND 100%]
5	External consultant/expert (other than Brokers)	[INSERT % BETWEEN 0% AND 100%]
6	Other	[INSERT % BETWEEN 0% AND 100%]
9	TOTAL	[MUST EQUAL 100%]

IF QB5C (5)=MORE THAN 0%, CONTINUE TO QB5D. OTHERWISE SKIP TO QB6 BELOW.

QB5D. What type of external consultant/expert did you/do you use?

OPEN TEXT BOX

PART C. Knowledge of food importing regulations

QC1. On a scale of 0 to 10, where 0 is 'No knowledge at all' and 10 is 'Very knowledgeable', how do you rate your company's overall knowledge of requirements of the Food Standards Code and imported food legislation including the requirements and obligations these place on your food importing activities?

NOTE: This excludes knowledge of biosecurity or quarantine requirements.

No knowledge at all										Very knowledgeable	Don't know
0	1	2	3	4	5	6	7	8	9	10	97

QC2. On a scale of 0 to 10, where 0 is 'Not at all confident' and 10 is 'Very confident', how confident are you in your company's ability to comply with the requirements of the Food Standards Code and imported food legislation?

NOTE: This excludes compliance with biosecurity or quarantine matters.

Not at all confident										Very confident	Don't know
0	1	2	3	4	5	6	7	8	9	10	97

QC3. On a scale of 0 to 10, where 0 is 'Not at all important' and 10 is 'Very important', how important are the following sources of information in helping you to meet your business' obligations under the Food Standards Code and imported food legislation? [RANDOMISE ORDER]

CODE		Importance Rating 0-10	Don't know
1	The Department of Agriculture & Water Resources website (www.agriculture.gov.au)	0-10	98
2	Customs agents/brokers	0-10	98
3	Industry associations & peak bodies	0-10	98
4	Company lawyer/legal team	0-10	98
5	Australian Border Force/Customs staff	0-10	98
6	Imported Food Notice issued by Department of Agriculture & Water Resources	0-10	98
7	Department of Agriculture & Water Resources food inspection officers	0-10	98
8	Other food importers	0-10	98
9	Food Standards Australia New Zealand (FSANZ) website (www.foodstandards.gov.au)	0-10	98
10	Suppliers, manufacturers or producers	0-10	98
11	Another channel	0-10	98

QC4. Through which of the following channels would you most prefer to receive information about any changes to food importing regulations? Select all that apply.

CODE	
1	The Department of Agriculture & Water Resources website (www.agriculture.gov.au)
2	Customs agents/brokers
3	Industry associations & peak bodies
4	Company lawyer/legal team
5	Australian Border Force/Customs staff
6	Imported Food Notice issued by Department of Agriculture & Water Resources
7	Department of Agriculture & Water Resources food inspection officers
8	Other food importers
9	Food Standards Australia New Zealand (FSANZ) website (www.foodstandards.gov.au)
10	Another channel [SPECIFY]
11	None of these
97	Don't know

Part D – Food Import Compliance Agreement Participation

Food Import Compliance Agreements (FICAs) offer food importers an alternative regulatory arrangement to inspection and testing of their products under the Imported Food Inspection Scheme (IFIS) by recognising an importer's existing documented food safety management system. This provides these businesses with a streamlined process for importing food, which should represent a substantial cost saving.

QD1. Had you heard of a Food Import Compliance Agreement (otherwise known as a FICA) before this survey?

Yes	1
No	2
Don't know	97

QD2. Does your business operate under a Food Import Compliance Agreement (FICA)?

Yes	1
No	2
Don't know	97

IF QD2 = 2, CONTINUE TO QD3. IF QD2=1 SKIP TO QD5A BELOW. IF QD2=97, GO TO QD1 BELOW.

QD3. What are the main barriers to you seeking a FICA for your food importing activities? Please select all that apply. [RANDOMISE ORDER EXCEPT OTHER & DON'T KNOW]

CODE	
1	Don't know enough about it
2	Too expensive/not worth the implementation and/or maintenance cost
3	Too complicated/too much hassle
4	Our business would not qualify
5	Other (PLEASE SPECIFY)

97	Don't know
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QD4. Currently those entering into a FICA need to ensure that all food types they import meet the conditions of the agreement.

Would you be more likely, less likely or equally as likely to apply for a FICA if your business could apply for part of its importing activities to be covered only (e.g. a specific category or type of food)?

CODE	
1	More likely to apply for a FICA
2	Equally likely to apply for a FICA
3	Less likely to apply for a FICA
97	Don't know

NOW GO TO QE1 BELOW.

QD5A. Can you provide an estimate of the time it took your business to originally establish the FICA?

CODE		Time [HOURS]	Don't know
1	FICA establishment hours estimate	[ENTER AMOUNT]	99999999

IF QD5A=DON'T KNOW, SKIP TO QD6A BELOW. OTHERWISE CONTINUE.

QD5B. At the previous question you indicated that it took [INSERT ESTIMATE HOURS FROM QD5A HERE] hours to establish the FICA.

In percentage terms, approximately what proportion of this work was undertaken by the following staff levels? [For example, if all the work is undertaken by administrative staff, please allocate 100% against this level]

CODE		Proportion
1	Management	[INSERT % BETWEEN 0% AND 100%]
2	Administration	[INSERT % BETWEEN 0% AND 100%]
3	Internal specialist/expert	[INSERT % BETWEEN 0% AND 100%]
4	External consultant/expert	[INSERT % BETWEEN 0% AND 100%]
96	Other	[INSERT % BETWEEN 0% AND 100%]
	TOTAL	[MUST EQUAL 100%]

IF QD5B (4)=MORE THAN 0%, CONTINUE TO QD5C. OTHERWISE SKIP TO QD6A BELOW.

QD5C. What type of external consultant/expert did you use when establishing the FICA?

OPEN TEXT BOX

QD6A. Can you provide an estimate of the time in hours it takes your business to maintain the FICA on an annual basis?

CODE		Time [HOURS]	Don't know
1	FICA maintenance annual hours estimate	[ENTER	99999999

		AMOUNT]	
--	--	---------	--

IF QD6A=DON'T KNOW, SKIP TO QF1 BELOW.

QD6B. At the previous question you indicated that it took [INSERT ESTIMATE HOURS FROM QD6A HERE] hours to maintain the FICA on an annual basis.

In percentage terms, approximately what proportion of this work was undertaken by the following staff levels? [For example, if all the work is undertaken by administrative staff, please allocate 100% against this level]

CODE		Proportion
1	Management	[INSERT % BETWEEN 0% AND 100%]
2	Administration	[INSERT % BETWEEN 0% AND 100%]
3	Internal specialist/expert	[INSERT % BETWEEN 0% AND 100%]
4	External consultant/expert	[INSERT % BETWEEN 0% AND 100%]
96	Other	[INSERT % BETWEEN 0% AND 100%]
	TOTAL	[MUST EQUAL 100%]

IF QD6B(4)=MORE THAN 0%, CONTINUE TO QD6C. OTHERWISE SKIP TO QF1 BELOW.

QD6C. What type of external consultant/expert do you use?

OPEN TEXT BOX

NOW GO TO QF1 BELOW.

PART E. Cost of complying with IFIS

QE1. In the 12 months (1 April 2015 – 31 March 2016), **approximately** how many consignments of imported food were subject to the following inspection types?

Please type a number for each option; if one doesn't apply to your company please enter 0.

Number of consignments through...	Number of consignments	Don't know
Imported Food Inspection Scheme (IFIS) only	[ENTER NUMBER]	97
Joint IFIS and Quarantine inspection	[ENTER NUMBER]	97
Quarantine inspection only	[ENTER NUMBER]	97

QE2. For the most recent consignment of food subjected to IFIS inspection (may or may not have included testing), what type of food (or foods) was inspected? Please be as specific as possible.

OPEN TEXT

QE3. For this most recent consignment of food subject to IFIS inspection, please indicate the estimated number of staff hours it took to manage the IFIS inspection process:

NOTE: This excludes hours required for biosecurity or quarantine purposes.

Estimated number of hours	[ENTER HOURS]
Don't know	9999999

IF QE3= DON'T KNOW, SKIP TO QE6 BELOW. OTHERWISE CONTINUE.

QE4. At the previous question you indicated it took [INSERT ESTIMATE HOURS FROM QE3 HERE] hours to manage the IFIS inspection process for the latest consignment of food.

In percentage terms, approximately what proportion of this work was undertaken by the following staff levels? [For example, if all the work was undertaken by administrative staff, please allocate 100% against this level]

CODE		Proportion
1	Management	[INSERT % BETWEEN 0% AND 100%]
2	Administration	[INSERT % BETWEEN 0% AND 100%]
3	Internal specialist/expert	[INSERT % BETWEEN 0% AND 100%]
4	Brokers/Customs agents	[INSERT % BETWEEN 0% AND 100%]
5	External consultant/expert	[INSERT % BETWEEN 0% AND 100%]
96	Other	[INSERT % BETWEEN 0% AND 100%]
	TOTAL	[MUST EQUAL 100%]

IF QE4(5)=MORE THAN 0%, CONTINUE TO QE5. OTHERWISE SKIP TO QE6 BELOW.

QE5. What type of external consultant/expert did you use?

OPEN TEXT BOX

QE6. For the most recent consignment of food that was referred for IFIS inspection (may or may not have included testing), how long was the consignment delayed at point of entry (or held within an approved premises)?

NOTE: This excludes hours delayed for biosecurity or quarantine purposes.

Estimated number of hours	[ENTER HOURS]
Don't know	9999999

PART F – Supplier assurance

QF0A. Approximately how many individual suppliers have you sourced food (to import) from over the past 12 months (1 April 2015 – 31 March 2016)?

Number of suppliers	[ENTER NUMBER]
Don't know	9999999

QF0B. Among the [INSERT NUMBER FROM QF0A ABOVE] individual suppliers you have sourced food for import from over the past 12 months (1 April 2015 – 31 March 2016), please indicate the number of suppliers that have specific food safety management system certification (e.g. BRC Global Standards, SQF, HACCP, ISO 9000, ISO 22000, etc.)

Number of suppliers with formal assurance accreditation	[ENTER NUMBER]
Don't know	9999999

IF QFOB=0 OR DON'T KNOW, CONTINUE TO QF0C BELOW. OTHERWISE SKIP TO QF2 BELOW.

QF0C. How do you obtain assurance that the food you are importing is compliant with the Australian Food Standards Code and relevant food legislation? Please select all that apply.

CODE	
1	Manufacturer/producer declarations
2	Verification checks and testing
96	Other (SPECIFY)
97	Don't know

NOW GO TO QG1 BELOW.

QF2. What food safety management systems do you accept as the basis of assurance from suppliers? Please select all that apply.

CODE	
1	Company proprietary standard (SPECIFY)
2	GLOBALG.A.P.
3	BRC Global Standards
4	SQF
5	HACCP
6	ISO 9000 – Quality Management Systems (manufacturing and service industries)
7	ISO 22000 – Food Safety Management System (food chain, farm to fork)
8	FSSC 22000
9	Global Aquaculture Alliance Seafood
10	International Featured Standards (IFS)
11	Global Red Meat Standard (GRMS)
12	CanadaGAP
13	Government certification (SPECIFY)
96	Other (SPECIFY)
97	Don't know

IF ANY OF B2 A,B,C,D,E,F,G,H OR I =1, CONTINUE TO QF3A. OTHERWISE SKIP TO QF4.

QF3A. For the following food types that you have imported over the past three years (1 April 2013 – 31 March 2016), please indicate the number of suppliers:

- with food safety management system certification (including any of those systems mentioned in the previous question); and
- without food safety management system certification.

INSERT ALL FOODS IDENTIFIED AT QB2 BELOW.

Please type a number for each option; if one doesn't apply to your company please enter 0.

	Food description	Number of suppliers	Number of suppliers	Total number of	Don't know
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		with food safety management system certification	without food safety management system certification	suppliers [AUTO ADD COLUMNS A & B]	
A	Food Type 1	[ENTER NUMBER]	[ENTER NUMBER]	[TOTAL NUMBER]	97
B	Food Type 2	[ENTER NUMBER]	[ENTER NUMBER]	[TOTAL NUMBER]	97
C	Food Type 3	[ENTER NUMBER]	[ENTER NUMBER]	[TOTAL NUMBER]	97
D	Food Type 4	[ENTER NUMBER]	[ENTER NUMBER]	[TOTAL NUMBER]	97
E	Food Type 5	[ENTER NUMBER]	[ENTER NUMBER]	[TOTAL NUMBER]	97
F	Food Type 6	[ENTER NUMBER]	[ENTER NUMBER]	[TOTAL NUMBER]	97
G	Food Type 7	[ENTER NUMBER]	[ENTER NUMBER]	[TOTAL NUMBER]	97
H	Food Type 8	[ENTER NUMBER]	[ENTER NUMBER]	[TOTAL NUMBER]	97
I	Food Type 9	[ENTER NUMBER]	[ENTER NUMBER]	[TOTAL NUMBER]	97

QF4. For the most recently engaged new supplier, please estimate approximately how many hours it took for your business to be assured this supplier's food would meet the Australian Food Standards Code and relevant food legislation?

Estimated number of hours	[ENTER HOURS]
Don't know	99999

QF5. Approximately how much time (in hours) does it take annually to maintain food safety management system assurance records (for all suppliers)? Please include the estimated time taken to conduct all relevant aspects, e.g. certification checks, verifications, internal audits etc.

	TIME [HOURS]	Don't know
Food safety management system assurance annual time estimate	[ENTER AMOUNT]	99999999

G. Traceability

QG1. Does your business have a documented (e.g. written) food recall system in place?

Yes	1
No	2
Don't know	97

IF QG1=1, GO TO QG2 BELOW. IF QG1= 2 OR 97, GO TO QG7 BELOW.

QG2. How easy or difficult was it for your business to establish a documented (e.g. written) food recall system?

	Very difficult	Difficult	Neither easy nor difficult	Easy	Very easy	Don't know
How easy or difficult to establish food recall system	1	2	3	4	5	97

QG3A Can you provide an estimate of the time in hours it took to initially establish the documented (e.g. written) food recall system?

	TIME [HOURS]	Don't know
Food recall system establishment time estimate	[ENTER AMOUNT]	99999999

QG3B. What were the main barriers or challenges associated with establishing a documented food recall system?

OPEN TEXT

QG4. Approximately how much time does it take annually to keep your documented (e.g. written) food recall system up to date?

	TIME [HOURS]	Don't know
Food recall system annual time estimate	[ENTER AMOUNT]	99999999

QG5. Does your food recall system have the ability to:

		Yes	No	Don't know
A	Identify the immediate supplier of a specific consignment of food imported into Australia?	1	2	97
B	Identify the immediate customer/s of a specific consignment of food imported into Australia	1	2	97

QG6A. If requested, approximately how long would it take (in hours) for your business to identify the immediate supplier of a specific consignment of food imported into Australia?

	TIME [HOURS]	Don't know
Approximate time in hours	[ENTER HOURS]	99999999

QG6B. If requested, approximately how long would it take (in hours) for your business to identify the immediate customer/s of a specific consignment of food imported into Australia?

	TIME [HOURS]	Don't know
Approximate time in hours	[ENTER HOURS]	99999999

NOW GO TO SECTION H BELOW.

QG7. How easy or difficult would it be for your business to establish a documented (e.g. written) food recall system?

	Very difficult	Difficult	Neither easy nor difficult	Easy	Very easy	Don't know
How easy or difficult to establish food recall system	1	2	3	4	5	97

QG8. What is the main reason your business does not have a documented (e.g. written) food recall system for the food you import?

CODE	
1	Don't import sufficient volume to warrant it
2	Low risk profile of food being imported
3	Too expensive
4	Too time consuming
5	Other [SPECIFY]
97	Don't know

Part H – FURTHER INDUSTRY CONSULTATION AND/OR RESEARCH

QH1. As part of the Department of Agriculture and Water Resources efforts to improve communications with food importers, we are keen to communicate directly when considering changes to regulations. Would you like to provide your contact details to the Department of Agriculture and Water Resources so you can be invited to participate in further consultation or research about possible changes to imported food requirements? If you agree, participation is voluntary and you are under no obligation to participate in the future.

Are you willing to be recontacted by the Department of Agriculture and Water Resources into the future?

Code		Instructions
1	Yes	CONTINUE
2	No	GO TO CLOSING SCRIPT

QH2. Thank you for your willingness to potentially engage in future consultation or research with the Department of Agriculture and Water Resources. Please record your name and contact details below in order for us to contact you if such opportunities arise. This information will be separated from your responses to the survey to ensure your confidentiality.

Name	
Best phone contact no. (incl. area code if landline)	
Email address	

CONCLUSION

Thank you, you have completed the survey.

As this is market research, it is carried out in compliance with the *Privacy Act 1988* and the information you provide will be used only for research purposes or as required/authorised by law. The research project is being conducted on behalf of the Department of Agriculture and Water Resources. The department's Privacy Policy can be accessed at

<http://www.agriculture.gov.au/about/commitment/privacy>

For questions about the Market Research Industry as a whole, you can call the Market and Social Research Society's Survey Line on 1300 364 830.

Thank you for sharing your views.

Please click "SUBMIT" to send your responses.