



ABN:75 266 051 838

Telephone: (08) 8410 7233
Facsimile: (08) 8211 7303

Level 1 / 67 South Terrace,
Adelaide, SA 5000
Postal Address: PO Box 6014
Halifax Street, SA 5000

Email: info@saff.com.au
Website: www.saff.com.au

24 February 2012

Impacts and Benefits of COAG Reforms
Productivity Commission
GPO Box 1428
CANBERRA CITY ACT 2601

Email: coagreporting@pc.gov.au

Dear Sir / Madam

The South Australian Farmers Federation (SAFF) is very concerned about the impact of COAG on Australia, and particularly on Australian agriculture. It appears to have added another layer of government and with it an associated level of bureaucracy and more red tape as well as the associated increased costs.

An example is the imposition of the Personal Properties Securities legislation. The aim of seeking to create a national system for the regulation and registration of security interests in personal property is admirable. However, for primary producers who want to ensure that they will maintain title of their products until fully paid for by having retention of title clauses in all their contracts, they will now have to register each of their contracts. It would appear that where for example a cereal grain producer sells to several grain traders each year, each and every contract needs registering, even where there may be more than one contract with the same trader. In trying to get this clarified from the National Service Centre of the Insolvency and Trustee Service Australia, SAFF was informed that their role is only "to provide a Register for the recording and searching of Personal Property Security Interests" and they could not and do not provide advice on how Personal Property Securities applies. This whole process will make it harder for primary producers to ensure that they can safeguard their ownership until paid.

In instances where COAG may have been able to make a difference, such as in the area of food labelling, COAG appears not to have become involved. There appears to still be no 'truth in labelling' provisions so that Australian produce is 100% produced in Australia, meaning that foodstuffs from overseas can still be labelled from Australia allowing consumers to think they are buying Australian products and creating unfair competition for Australian producers. As part of examining the impacts and benefits of COAG reforms on business regulation, the Productivity Commission should look at food labelling as part of food regulation.

.../2

While electricity is not being examined in this Inquiry, the changes within the electricity market are a good example of the interference of COAG. The establishment of the Australian Energy Market Operator (AEMO) by COAG and the redefining of costs and standards has all led to more red tape and increased costs that are being passed on to consumers.

Yours sincerely

Carol Vincent
CHIEF EXECUTIVE