

12th October 2007

Mr Mike Woods
Lead Commissioner – Annual Review of Regulatory Burdens on Business
Productivity Commission
PO Box 80
Belconnen ACT 2616

Dear Mr Woods,

Re: Suggested terms of reference for ICA system review

I am writing to follow up from the roundtable discussion held by the Productivity Commission in Canberra on the 27th September 2007 where the Commission's draft research report on the regulatory burdens on businesses in the primary sector was discussed. In particular, we would like to provide further comment on the discussions relating to the Interstate Certification Assurance (ICA) scheme.

The Productivity Commission's draft report states that "a review of the Interstate Certification Assurance Scheme to develop national standards and procedures is planned and will address some concerns". At the roundtable meeting, it was established that Growcom, and other industry organisations, were unaware of this planned review.

As a result, it was suggested that Growcom provide advice to the Productivity Commission on possible terms of reference of a review. Generally Growcom would like to submit that any review of this nature must incorporate a meaningful stakeholder consultation process to ensure all the issues and concerns of industry, and those raised within the commission's draft report, are taken into consideration.

We have given the issue further consideration and believe that such a review should examine the overarching process and guidelines around interstate plant quarantine matters. This would include ICAs and other interstate processes to allow trade between states and quarantine restrictions.

In relation to terms of reference, Growcom suggests that the following should be included:

1. A national review of interstate quarantine structures and process should examine the system in terms of:
 - a) Efficiency and effectiveness;
 - b) Protocol development and review processes;
 - c) Consistency between jurisdictions;
 - d) Performance standards and reporting structures;
 - e) Transparency and accountability;
 - f) Membership and terms of reference of committees;
 - g) Dispute resolution processes;
 - h) Linking with international protocols;
 - i) Assessment of science and risk;
 - j) Communication channels and engagement between governments and with industry.

2. Make recommendations on how to reform the system to improve interstate quarantine processes and market access.

Growcom anticipates that the above feedback will be taken into consideration by the Productivity Commission when finalising the report. I can provide further feedback on Growcom's position in relation to this issue if requested.

Yours sincerely

Jan Davis
CEO