



28 November 2022

Department of Agriculture, Fisheries and Forestry
18 Marcus Clarke St
CANBERRA ACT 2601

Department of Agriculture, Fisheries and Forestry Discussion Paper – Sustainable funding and investment to strengthen biosecurity

Cruise Lines International Association (CLIA) Australasia welcomes the opportunity to comment on the Department's discussion paper on improving sustainable funding and investment for biosecurity.

CLIA Australasia is the regional office of CLIA, the world's largest cruise industry trade association. CLIA represents 95% of the world's ocean-going cruise capacity and serves as a non-governmental consultative organisation to the International Maritime Organization (IMO), an agency of the United Nations.

The cruise industry's contribution to the Australian economy is significant. In a normal year, the industry makes an overall contribution of over A\$5bn to the Australian economy and supports over 18,000 jobs¹. Cruise delivers significant international visitation to Australia and facilitates the dispersal of visitation to many regional areas, driving economic activity in remote and regional Australia.

1. Cruise industry commitment

CLIA acknowledges the importance of Australia having a robust national biosecurity system that is able to prevent and respond to incursions of pests and diseases species. We also acknowledge the shared role between government, industry and other stakeholders to minimise biosecurity risks.

The cruise industry is strongly committed to protecting Australia from biosecurity threats and has long engaged with the Department and predecessor biosecurity agencies including Biosecurity Australia and the Australian Quarantine and Inspection Service to ensure stringent protection measures for both passenger movements and maritime operations. CLIA is also a key collaborator on maritime industry standards at the global level through the IMO and contributes to the development of international standards and practices on matters such as biosecurity.

Cruise operators follow practices that effectively reduce the risk of cruise vessels carrying pest species, such as the deployment of on-board environmental officers, and the implementation of biosecurity risk management plans and safe food sourcing and storage processes. Working in conjunction with the Department's Traveller Biosecurity unit, cruise lines make quarantine announcements onboard their

¹ Based on findings by AEC Group Pty Limited. AEC's Economic Impact Assessment of Cruise Tourism in Australia is available at www.cruising.org.au.



ships to reinforce traveller education and raise awareness of the prohibition on removing any food from the ship. Cruise ships are also subject to strict maintenance requirements and follow strict biofouling risk management practices which includes regular cleaning of the ship's hull and the use of anti-fouling paint, and which are audited by jurisdictions to which cruise ships sail (for example New Zealand).

2. Comments on Funding Options

Cruise ship operators pay a considerable amount in fees and charges relating to biosecurity both directly to the Department and through remittance of the Passenger Movement Charge (PMC).

Each time a cruise ship arrives in Australia it pays the Department a vessel arrival charge of close to \$1000. Cruise operators also pay for a range of other biosecurity inspections and assessments undertaken by the Department such as seasonal pest assessments, crew change assessments, ship sanitation certificate assessments, cruise vessel health reporting assessments and routine vessel inspections.

We estimate there are over 600,000 international arrivals/departures in and from Australia by cruise ships in a normal year. For each cruise traveller departing Australia, cruise operators remit \$60 to the Australian government by way of the PMC, meaning that the cruise sector alone currently contributes at least \$36 million in PMC revenue each year.

The PMC was introduced by the government as a cost recovery measure to recoup the notional cost of Customs, Immigration and Quarantine processing of inward and outbound passengers and the cost of issuing short term visitor visas. Regrettably, due to a policy shift by government, the significant revenue from the PMC (estimated to exceed A\$1 billion annually) is now used as a general revenue raising source. However, while the discussion paper does not mention this, we understand the Department does receive a portion of PMC revenue for its biosecurity work.

While it is extremely disappointing that the PMC is not hypothecated for traveller processing costs consistent with its original public rationale, this does not detract from the fact that international cruise travellers are already paying a significant charge meant for this purpose. It would be disingenuous to suggest that international travellers do not contribute to biosecurity just because the revenue raised for that purpose does not make its way into the Department's budget.

The PMC is one of the highest departure taxes in the world and CLIA does not support a further increase in it.

To ensure that the Department continues to receive funding from international travellers, government should create a fixed biosecurity allocation from the existing PMC charge.



3. Co-investment opportunities

As cruise operations are logistically complex and touch a number of different sections within the Department, we believe a partnership approach between the Department and industry will yield the best results in terms of managing biosecurity risk and being prepared to respond to threats.

One initiative we have suggested in past submissions is a voluntary cruise accreditation scheme, along the lines of a similar scheme introduced by the Ministry of Primary Industries (MPI) in New Zealand in 2016. The scheme, which was developed in conjunction with CLIA and the major cruise lines, has been successful in significantly reducing the risk of passengers bringing prohibited food and plant items into New Zealand, as well as enabling MPI to reduce its costs of passenger clearances for accredited cruise ships.

Under the New Zealand scheme, cruise ships are accredited by MPI after demonstrating to MPI's satisfaction that they have processes in place (for example, for the safe sourcing and storage of food) that effectively limit the risk of a pest species being introduced to New Zealand. In addition, accredited ships make passenger announcements before arrival into New Zealand and display MPI-provided collateral onboard to remind passengers that food cannot be taken off the ship. This messaging was developed specifically by MPI for cruise passengers and is displayed before the vessel's arrival into New Zealand at relevant areas such as restaurants and at the gangway before passengers disembark.

To ensure the ongoing success of the scheme, CLIA also engages with MPI regularly, both in formal stakeholder meetings (held 1-2 times per year) and on ad hoc issues as they arise.

We believe a similar scheme in Australia would represent a positive co-investment to strengthen biosecurity through the cruise traveller pathway.

Please contact me if you require any further information from us.

A handwritten signature in black ink, appearing to read "Joel Katz", with a stylized, cursive-like script.

Joel Katz
Managing Director
CLIA Australasia