



November 23, 2022

Department of Agriculture, Fisheries and Forestry  
GPO Box 858  
Canberra ACT 2601  
Australia

Re: Sustainable Funding and Investment to Strengthen Biosecurity: Discussion Paper

To Whom it May Concern,

The California Citrus Quality Council (CCQC) represents the California citrus industry including more than 2,500 citrus growers and approximately 80 citrus packers, on technical and regulatory issues domestically and overseas. The total annual farmgate value of California citrus production is \$2.3 billion.

Last year, the California citrus industry exported \$33.7 million of citrus fruits to Australia, which are subject to phytosanitary standards that are supervised by USDA's Animal and Plant Health Inspection Service (APHIS) with the cooperation of citrus growers and packers. We consider our industry to be a partner along with APHIS and Australia's Department of Agriculture, Fisheries and Forestry (DAFF) in ensuring that there is no biosecurity risk from California citrus imports. Rather than create biosecurity risk, the California citrus industry has demonstrated that it is a valued partner in minimizing risk when exporting fresh citrus.

The California Department of Food and Agriculture and APHIS have extensive pest detection programs in place for growing and ensuring that packing is conducted according to phytosanitary standards. Inspection and verification programs have proven to be important steps in ensuring minimal biosecurity risk. Under the current program, imports are inspected at the port of arrival in Australia by biosecurity inspection officials. Unfortunately, this part of the process has not been conducted in the most efficient manner because of a lack of inspection resources. This has resulted in significant delays at the port that has caused losses from decay and diminished fruit quality. These losses could be prevented if DAFF would reinstate its Offshore Preclearance Inspection (OPI) program.

This is a relevant point to consider since the OPI program is completely funded by commercial interests. This program is a practical way to ensure that there are no delays at the port, biosecurity risks remain offshore and the costs of implementing the program are covered by the participants.

As DAFF considers options for sustainable funding of biosecurity it should be mindful that user fees that exceed cost recovery can be a significant disincentive for importers and exporters.

Unreasonable costs to importers and exporters can discourage trade and function as a nontariff trade barrier.

CCQC appreciates this opportunity to comment on this important matter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "JRCranney Jr". The signature is written in a cursive, flowing style.

James R. Cranney, Jr.  
President

cc: CCQC Board of Directors