



AFPA Submission to:

***DAFF consultation on plant market
access prioritisation and communication***

December 2024

About the Australian Fresh Produce Alliance

The Australian Fresh Produce Alliance (AFPA) is made up of Australia's key fresh produce growers and suppliers. The members include:

- Costa Group
- Perfection Fresh
- Montague
- Pinata Farms
- Fresh Select
- Mackay's Marketing
- Driscoll's
- Australian Produce Partners
- Premier Fresh Australia
- Rugby Farming
- Fresh Produce Group.

These businesses represent:

- half the industry turnover of the Australian fresh produce (fruit and vegetables) sector - \$10 billion total
- a quarter of the volume of fresh produce grown in Australia - 1 million of the 3.9 million tonne total
- more than a third of fresh produce exports - \$410 million of the \$1.2 billion export total
- more than 1,000 growers through commercial arrangements, and
- more than 15,000 direct employees through peak harvest, and up to 25,000 employees in the grower network.

The key issues the AFPA is focusing on include:

- packaging and the role it plays in product shelf life and reducing food waste landfill,
- labour and the need for both a permanent and temporary supply of workers,
- market access to key export markets for Australian produce,
- product integrity both within and outside of the supply chain,
- pollination and research into alternative sources, and
- water security, including clear direction as to the allocation and trading of water rights.

The AFPA's aim therefore is to become the first-choice fresh produce group that retailers and government go to for discussion and outcomes on issues involving the growing and supply of fresh produce.

Products grown by AFPA Member companies include:

| | | | | |
|---------------|-------------------|-------------|-------------|--------------|
| Apples | Blueberries | Fioretto | Onions | Salad leaf |
| Apricots | Broccoli | Green Beans | Oranges | Spinach |
| Asparagus | Broccolini | Herbs | Peaches | Strawberries |
| Avocado | Brussel Sprouts | Lemons | Pears | Sweet Corn |
| Baby Broccoli | Butternut Pumpkin | Lettuce | Pineapples | Table grapes |
| Baby Corn | Cabbage | Mandarins | Plums | Tomatoes |
| Bananas | Cauliflower | Mango | Potatoes | Water Cress |
| Beetroot | Celery | Mushrooms | Cucumber | Wombok |
| Blackberries | Cherries | Nectarines | Raspberries | |

Summary

The Australian Fresh Produce Alliance (AFPA) welcomes the Department of Agriculture, Fisheries and Forestry's (DAFF) consultation on plant market access prioritisation and communication. Effective market access is crucial for the growth and sustainability of Australia's fresh produce industry. The AFPA supports reforms that enhance processes, increase collaboration, and improve communication, ensuring benefits for both industry and government.

The fresh produce industry's growth hinges on greater access to international markets. Fresh produce exports account for less than 2% of Australia's total agricultural export value, highlighting significant untapped potential. Enhanced export opportunities would drive economic growth, regional prosperity, job creation, and innovation. However, market access for fresh produce is uniquely complex, requiring product-specific protocols that can take over a decade to secure. Streamlining processes, strategic government engagement, and long-term investments are essential to expedite market access and unlock the industry's full potential.

Key Challenges in the Current Prioritisation Process and Industry Engagement

The market access prioritisation process faces several challenges which continues to impact the achievement of timely and commercially relevant market access outcomes:

1. **Incomplete and Outdated Applications within the "Pool":** Many applications have been found to lack accurate data, are not commercially viable pathways, and/or present questionable economic valuations.
2. **Insufficient Rigor in Assessment:** The IMAAP process lacks appropriate rigour to validate applications comprehensively, specifically with respect to economic analysis of a market opportunity and suitability of technical data packages.
3. **Lack of Transparency and Communication:** Stakeholders perceive the process as opaque, with limited feedback and collaboration opportunities, leading to mistrust and inefficiencies.
4. **Insufficient Consideration of Trading Partner Acceptance:** There is no criteria in DAFF's prioritisation framework that allows for adequate consideration of the likelihood of a trading partners accepting the proposed market access pathway and supporting information (data).

These challenges have the potential to reduce negotiation readiness, waste resources on low-quality applications, and delay more viable and valuable opportunities.

Proposed Solutions

To address these issues, AFPA recommends:

1. **Reforming IMAAP:** amending its purpose and introducing third-party validation of technical data and economic analysis, ensuring consistency and quality. Using technical experts and an independent economist engaged by Hort Innovation is proposed. Greater emphasis should also be placed on assessing the commercial viability of the proposed pathway.
2. **Regular Pool Reviews:** Conduct a comprehensive review of the market access pool every four years (at a maximum) to maintain application relevance and quality.
3. **Expand DAFF's assessment criteria** to better consider the likelihood of success of an application and more stringently apply the existing DAFF criteria related to the industry's ability to meet the technical requirements of the market, such as data quality and quantity.
4. **Enhanced Engagement:** During DAFF's priority selection process, invite applicants to provide updated information (e.g. new market intelligence), facilitate collective meetings with applicants, and provide clear decision rationales.
5. **Hosting annual industry updates** on market access negotiations and provide greater access by PIBs to the list of applications in each countries pool as well as access by levy payers the PIB applications.

By adopting these reforms, DAFF and relevant parties can strengthen the prioritisation process, enhance its responsiveness to industry needs, and position Australian fresh produce for global success.

The AFPA would welcome the opportunity to further discuss and develop its proposed reforms to the plant market access prioritisation process and DAFF's engagement and communication.

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1. Introduction

The Australian Fresh Produce Alliance (AFPA) welcomes the opportunity to provide feedback to the Department of Agriculture, Fisheries and Forestry's (DAFF) consultation on plant market access prioritisation and communication. Securing effective market access for Australian fresh produce is vital to the industry's viability and growth. The AFPA acknowledges DAFF's commitment to streamlining processes and fostering a more collaborative approach with industry stakeholders, and we offer this submission to support enhancements that will deliver tangible benefits for both the industry and DAFF.

2. Importance of new and improved fresh produce market access

The future growth of the fresh produce industry is dependent on securing greater market access into key export markets. Domestically, Australia's market is fully saturated, 97% of fresh produce consumed in Australia is grown locally. Unless greater market access is achieved, the industry's growth will remain largely tied to Australia's population growth.

There is great potential to grow Australia's export of fresh produce. Australian produce is highly sought after around the world. The broader agriculture industry has demonstrated how exponential growth is achievable when export opportunities are created. In 2022/23, the value of Australia's total agricultural exports reached \$79.9 billion, a rise of \$12.5 billion (+18.6 per cent) from the year before – fresh produce was less than 2% of this total export value (\$1.55 billion), demonstrating that there is significant untapped potential to grow fresh produce trade.

Improved export opportunities for the fresh produce industry will:

- support economic growth and the ongoing prosperity of Australia, especially regional communities,
- increase the number of local, full-time, secure jobs supported by the industry, and
- drive innovation and support domestic resilience, innovation, price stability and more through increased production and efficiency gains

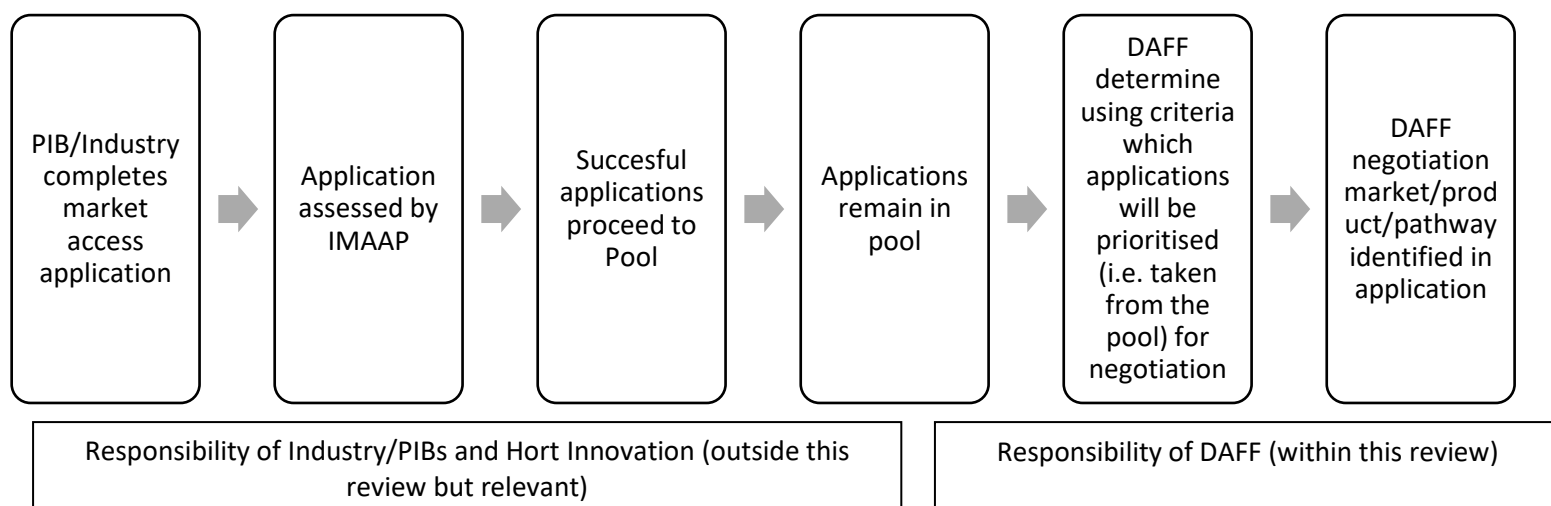
More than 100 different products are grown across Australia, a major strength of our national fresh produce industry. The challenge is that each product often needs a specific technical market access protocol to be agreed with our trade partners. In some instances, market access is required at a varietal level (e.g. specific variety of table grapes) adding to complexity. This differs for beef or grain where a single technical market access protocol will allow these products to be exported to an international market.

From a standing start, gaining new market access for fresh produce can take more than 10 years, however, this can be hastened through a more concentrated effort on finding efficiencies and refining processes, long-term investments by both government and industry in capacity building, and by government raising fresh produce trade and market access during high-level political engagements with existing and potential trading partners countries.

3. Plant market access prioritisation and communication

DAFF plays a critical role in facilitating market access for Australian fresh produce by managing and negotiating market access with trading partners. This process is essential for enabling Australian producers and exporters to reach new markets and expand their consumer base, growing and safeguarding the domestic industry. However, the existing market access prioritisation system has significant flaws.

At a high level, the current market access prioritisation process is outlined below. Understanding that this review asks **only** about DAFF's role in the market access, it is important to consider the whole process in order to improve outcomes – even if DAFF made changes to their prioritisation framework, without improvements to industry's part of the process, there would be no overall improvement in process.



The current system for prioritising market access applications is supported by the International Market Access Assessment Panel (IMAAP). IMAAP evaluates applications submitted by Peak Industry Bodies (PIBs). Despite the intent of this well-structured process, several shortcomings have been identified that create significant challenges that create unnecessary issues and hindering DAFF's decisions making. Likewise, there is a lack of transparency around DAFF's decision-making process, and an opportunity to improve industry engagement as part of the process to create greater industry alignment and understanding of government decisions.

There is also an opportunity to expand and improve DAFF's prioritisation principles and criteria (see Appendix 2), so that the criteria better matches the principles and a more appropriate level of consideration can be given to the respective trading partner's response to a request.

Key Challenges with the Existing System

1. Incomplete and Inaccurate Applications

Many applications within the market access pool are outdated, incomplete, or contain inaccuracies. These deficiencies impair DAFF's ability to make well-informed decisions. The challenges include:

- Outdated Applications: Some applications no longer reflect viable commercial opportunities due to changes in market conditions or exporter priorities, and/or have information that is no longer relevant or permissible.
- Incomplete Technical Data: Essential data for host countries to assess a market access request is lacking or not of the quality and quantity required.
- Incorrect Pathways: Proposed trade pathways may not align with market realities, rendering them impractical or unfeasible.
- Inconsistent Economic Analysis: Some applications have been found to provide an inaccurate or overstated valuation of market opportunities, undermining the prioritisation process.

2. Insufficient Rigour in the IMAAP Process

The challenges outlined above are largely attributable to the IMAAP process lacking robust mechanisms to scrutinise applications for technical and commercial viability. This is largely due to:

- Limited expertise on the panel to assess the completeness and quality of technical data.
- Minimal interrogation of the commercial viability of proposed pathways.
- Inconsistent methodologies across industries for assessing potential trade value, leading to unreliable comparisons.

3. Lack of Transparency and Communication

Industry stakeholders often perceive the prioritisation process as opaque and unfairly subjective. DAFF has established prioritisation criteria but has not effectively communicated how these criteria are applied in decision-making. The lack of feedback mechanisms for unprioritised applications and the absence of collaborative forums further exacerbate industry dissatisfaction. This has led to:

- Mistrust among stakeholders regarding DAFF's decision-making.
- Missed opportunities for strategic collaboration across industries.
- Competition among PIBs rather than a unified, sector-wide approach to market access.

There is also no prescribed means for levy payers or representative bodies to view applications currently in market pools for possible negotiation, or any kind of regular update to industry of all commodities in market pools (e.g. a periodically released overview of all country pools and commodities in pools). This is a significant deficiency in the market access application process that must be remedied by both DAFF and Hort Innovation.

Implications of Current Challenges

The inefficiencies in the market access prioritisation process have significant implications for Australia's horticulture export strategy:

1. **Reduced Readiness for Negotiation:** Poor-quality applications and outdated data reduce DAFF's preparedness to seize negotiation opportunities with trading partners.
2. **Inefficient Resource Allocation:** Time and resources are spent on applications that lack the necessary foundation for progressing to negotiation or are not commercially viable.
3. **Missed Economic Opportunities:** Inadequate prioritisation can delay or prevent high-value market opportunities from being pursued.
4. **Erosion of Trust:** The lack of transparency and effective communication undermines industry confidence in the prioritisation process, creating barriers to collaboration.

4. Insufficient Consideration of Trading Partner Acceptance

A principle of DAFF's prioritisation process is to "Take into account practical considerations that could impede the successful negotiation of the market access request, including resourcing". However, a seemingly overlooked but critical piece of DAFF's consideration of any request is a trading partners' likelihood of accepting the proposed market access pathway based on market intelligence and the application's supporting information. While existing criteria largely considers the domestic and technical components of the application, external factors—including political and cultural dynamics—are not adequately assessed.

This oversight can result in:

- Resources being directed toward applications with a low probability of success.
- Delays in pursuing opportunities that are more closely aligned with a trading partner's priorities.
- Missed opportunities to align applications with partner-specific requirements, creating unnecessary roadblocks during negotiations.

DAFF should also more stringently assess its existing criteria, that Industry can meet the technical requirements of the importing country, such as provision of efficacy data for end-point treatments, evidence of pest freedom, phytosanitary measures, and maximum residue limits. Implications of this challenge include reduced efficiency in negotiations, wasted resources on unfeasible pathways, and weakened trade relationships with potential partners.

4. Improving Plant market access prioritisation and communication

To address these challenges, DAFF should collaborate with Hort Innovation and industry to improve the process for market access prioritisation and communication. Table 1 below proposes changes to the market access prioritisation process that aim to enhance the integrity of the application process, improve the quality of data used for decision-making, and foster greater transparency and collaboration between DAFF and industry stakeholders.

The changes (outlined in Table 1) are based on the following recommendations:

1. Reforming IMAAP's purpose and committee

IMAAP should focus on validating applications based on three key criteria: commercial viability, technical data quality, and economic trade value. To ensure robust validation:

- Third-party experts should be engaged to assess technical data completeness and quality. Technical experts in programs such as the Fresh and Secure Trade Alliance (FASTA) have the expertise required to evaluate data effectively.
- An independent economist, potentially engaged through Hort Innovation, could ensure consistent and credible economic analysis of potential trade value. A common methodology will enable accurate comparisons across applications.

Third-party validation adds significant value by providing objective, expert assessments, reducing the burden on IMAAP members, and ensuring consistency across submissions. Leveraging external expertise also enhances the credibility of the process and mitigates the risks of biased or incomplete internal evaluations.

IMAAP should also provide a decision brief upon granting or denying an application to DAFF and the Applicant that summarises external advice, industry input, and other relevant information - the current evaluation Table could be adapted.

2. Regular review of the Market Access Pool

Applications in the market access pool must be periodically reviewed to maintain their relevance and currency. A maximum of a four-year review cycle is proposed, starting with a comprehensive review of all applications in January 2025. During these reviews, IMAAP should reassess each application to determine:

- If the commercial opportunity still exists or has evolved.
- Whether the technical data remains of appropriate quality to support negotiation.

This regular review process ensures that the pool is populated with high-quality, actionable applications, enabling DAFF to seize timely opportunities with trading partners.

3. Proposed additional criteria for DAFF's assessment

DAFF must expand its criteria for priority section to better align to its principles and more stringently apply the existing criteria related to the industry's ability to meet the technical requirements of the market, such as data quality and quantity. Suggest adding the following criteria or similar:

Criteria: Likelihood of success

Description: The proposed market access pathway is evaluated for alignment with the trading partner's regulatory framework, import policies, and strategic priorities. This includes evidence that:

- The trading partner is receptive to similar requests or commodities from other countries; this includes providing explicit feedback to industry on "novel" applications whereby a requested pathway is considered a novel treatment option.
- Available data and technical evidence meet the partner's expectations and import conditions.
- Whether the proposed pathway will conflict with the trading partner's economic, agricultural, or political goals.

This will also ensure the applicants and IMMAP better consider the feasibility of acceptance by the trading partner, as well as streamline negotiations, reduce delays, and focus efforts on opportunities with a higher probability of success. This is also critical to industry to ensure that industry is able to best invest R&D funds to create market access applications that will create market access outcomes for industry.

4. Enhanced engagement and communication during negotiating priority selection

At the priority selection phase, DAFF should enhance collaboration and transparency by:

- Hosting collective meetings with applicants (i.e. PIB for applications under consideration within the pool) to discuss applications and encourage consensus-building across industries.
- Inviting applicants to present updated information, including market intelligence and third-party analyses, to provide contemporary insights that can inform DAFF's decisions.
- Communicating selection outcomes clearly, with a concise rationale for decisions provided in a communique to all stakeholders.

Additionally, DAFF should host an annual forum to update industry stakeholders on the status of market access negotiations and provide an overview of all applications in the pool. This should occur outside of the current Horticulture Industry Export Consultative Committee (HIECC) process. Participants should be provided with an overview of the Pool – that is an overview of applications for market access for all industries. This initiative would foster greater industry alignment and mutual understanding of DAFF's strategic approach.

By implementing these reforms, DAFF and relevant parties will strengthen the market access prioritisation process, increase its responsiveness to industry needs, and position Australian fresh produce for greater success in international markets.

Table 1: Revised Market Access Prioritisation Process

| | Proposed Process | Required changes to current process |
|----------------------------------|---|---|
| Application to the Pool | <p>Peak Industry Bodies (PIB) submit an application to International Market Access Assessment Panel (IMAAP).</p> <p>IMAAP determine whether each application's:</p> <ol style="list-style-type: none"> 1. pathway is commercially viable 2. technical data supports the pathway and is deemed of appropriate quality 3. Economic analysis on the value of the opportunity is completed by a 3rd party <p>Each component can be supported by:</p> <ol style="list-style-type: none"> 1. Letters of support from growers/those that intend to use the proposed pathway 2. An assessment on data could be undertaken by technical experts at FASTA who can produce a recommendation on the quality of the data 3. Hort Innovation could retain suitable economist to model the potential value of trade; this can be drawn on by PIBs seeking to put an application into the Pool. <p>If both the above criteria are satisfied, the commodity can enter a market's Pool to await consideration for negotiation.</p> | <p>The role of the IMAAP panel could be changed to: <i>Confirming that the relevant criteria have been met.</i></p> <p>This is because supporting evidence to the application has now been gather, verified and has a recommendation attached by third party agencies and experts.</p> <p>A decision brief, including a summary of external advice sought, should be submitted by IMAAP with each application to submitted to the Pool and shared with DAFF, or in the case of rejections, used as a means for feedback to the PIB.</p> |
| The Pool | <p>Applications within the Pool are reviewed every four years by IMAAP. For each application, IMAAP should consider:</p> <ol style="list-style-type: none"> 1. if the commercial opportunity remains 2. whether the data is still of an appropriate quality and quantity to support a negotiation <p>This should be a new process moving forward with the Pool at January 2025 to be reviewed in its entirety according to the above.</p> | <p>A new activity proposed to address currency of information in the pool.</p> |
| Selection for negotiation | <p>At the point of priority selection for negotiation:</p> <p>DAFF invite relevant Applicants to meet to discuss their applications and provide any additional information to support the decision-making process, e.g. third-party economic analysis, market intelligence, etc.</p> <p>Applicants collectively meet with DAFF to discuss their applications and proposal.</p> <p>DAFF use existing principals and criteria (see appendix 1), in addition to other recommended criteria regarding a country's likelihood of accepting a request and associated data.</p> <p>DAFF advise industry of their decision with a brief communique on the outcome.</p> | <p>The meeting of Applicants provides an opportunity for industry to reach a consensus or, at minimum, for each applicant to be aware of the information available to DAFF in making their decision.</p> <p>Providing Applicants with an opportunity to present additional information will support DAFF to make better decisions with contemporary advice and intelligence from industry.</p> <p>This also supports greater industry understanding of the strategic intent employed by DAFF in selecting negotiation priorities.</p> |

Appendix 1: AFPA Survey Response

Department of Agriculture, Fisheries and Forestry - Consultation on plant market access prioritisation and communication

1. Which industry sector is most relevant to you?
 1. Horticulture
 - ~~2. Grains~~
2. What commodity group and/or organisation do you belong to?

Australian Fresh Produce Alliance

| HORTICULTURE Process questions |
|--|
| <p>3. Are you familiar with the horticulture International Market Access Assessment Panel (IMAAP) application process for market access?</p> <ul style="list-style-type: none"> <input type="radio"/> Yes, I have made an application. <input checked="" type="radio"/> Yes, but I have not made an application. <input type="radio"/> No. |
| <p>4. In your opinion, is there any information you feel the department should consider that is not captured in the current International Market Access Assessment Panel (IMAAP) application form?</p> <ul style="list-style-type: none"> <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not sure <p><i>If yes, please specify</i></p> <p>The commercial viability of a pathway is inadequately captured, and beyond this, information that is captured needs to be better verified, preferably by third-party providers, including the technical data to support a pathway and the potential economic value of trade.</p> |
| <p>5. Do you think the horticulture industry should collectively prioritise market access requests and provide ranked priorities to the department to consider?</p> <ul style="list-style-type: none"> <input type="radio"/> Yes <input checked="" type="radio"/> No, the current process is preferred (where unranked, eligible requests are provided for the department to prioritise). – See submission for proposed improvements to existing process <input type="radio"/> Not sure |
| <p>6. Please rate your level of understanding about the department's process for determining plant market access priorities (prioritisation process):</p> <ul style="list-style-type: none"> <input type="radio"/> Good understanding <input checked="" type="radio"/> Some understanding <input type="radio"/> Little to no understanding |
| <p>7. Do you consider the department's market access prioritisation process to be transparent?</p> <ul style="list-style-type: none"> <input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A |
| <p>8. What do you think is the most important factor for the department to consider when deciding market access priorities?</p> <p>The commercial and technical viability of proposed pathways.</p> |
| <p>9. What, if anything, would you like to understand better about the department's market access prioritisation and negotiation processes? (select all that apply)</p> <ul style="list-style-type: none"> <input type="radio"/> Nothing, I have a good understanding. <input checked="" type="radio"/> The criteria used to decide priorities. <input checked="" type="radio"/> Timing around when decision making process begins for deciding new priorities. <input checked="" type="radio"/> How the department negotiates with trading partners. |

- Why market access negotiations can take a long time.
- Other – please specify






10. What, if anything, would you recommend the department could do differently in its approach to prioritising commodities for market access?

- Support changes to the IMAAP process as agreed by industry and Hort Innovation
- Support and participate in a review (2025) of all current applications in the pool, and support and participate in regular (maximum of a 4 year period) reviews of applications in the pool
- Expand the existing priority assessment criteria to incorporate a criteria that enables DAFF to make an assessment of the likelihood of success of an application
- Improve engagement with stakeholders on prioritisation selection by:
 - Creating an opportunity for applicant industry to meet with DAFF and discuss their application ahead of prioritisation
 - Provide clear feedback to industry on rationale for selected priorities
 - Host an annual meeting with all stakeholders to provide an update on all applications in the pool, with a focus on those under active negotiation.

Communication questions

4. How do you currently receive information about the department's decisions on market access priorities?
 - ✓ Directly from the department
 - Peak industry body
 - Other – please specify
5. Are you satisfied with the frequency of communication you receive about the status of market access requests relevant to you?
 - Yes
 - ✓ No
 - N/A
6. When provided updates, are you satisfied with the level of detail you receive about the status of market access requests relevant to you?
 - Yes
 - ✓ No
 - N/A
7. What, if anything, would you recommend the department could do differently in communicating information about plant market access requests?
 - Provide communiques on the outcomes of selection and prioritisation decisions, including the rationale behind them.
 - Host an annual industry forum summarising current market access negotiations and all applications in the pool, and provide participants with a document overviewing applications in each pool.
8. Do you have an interest in receiving information about current market access negotiations across the broader plant sector as a whole, for all trading partners?
 - ✓ Yes
 - No
 - N/A

Appendix 2: DAFF's National Prioritisation Principles & Criteria (as presented to industry at Hort Innovation 2024)

| National Prioritisation Principles & Criteria | | |
|---|---|--|
| PRINCIPLES | Take into account Australia's national interest, including alignment with broader Australian Government interests and the national trade policy agenda (portfolio priorities and overall bilateral relationship). |  |
| | Meet the department's strategic objective to assist industry to grow to a \$100 billion agriculture sector by 2030. |  |
| | Deliver tangible benefits that add value to the Australian community. |  |
| | Identify and address challenges or barriers that could inhibit Australia's market access and trade potential. |  |
| | Take into account practical considerations that could impede the successful negotiation of the market access request, including resourcing. |  |
| CRITERIA | Broadly supported | The submission is broadly supported by growers, exporters, industry bodies, states and territories, and recognised as a priority in, for example, the industry's export strategy. |
| | Inclusive | The opportunity is available to the majority of growers/producers and does not unduly exclude areas based on, for example, regional limitations. |
| | Market potential is verifiable | Evidence-based analysis is used to support justification of the market access request and its anticipated market potential. This includes factors such as export value, consumer interest, size of market in target country, and cost to domestic market to realise the opportunity. |
| | Export ready | Industry (including growers and exporters) is able to meet the operational requirements related to preparing goods for export. Any issues concerning the ability to meet requirements are, or can be, addressed and there is clear industry commitment and capacity to export. |
| | Technically competent | Industry can meet the technical requirements of the importing country, such as provision of efficacy data for end point treatments, evidence of pest freedom, phytosanitary measures and maximum residue limits. |
| | Clearly defined export pathway | A clear technical and operational position is available to support the preferred export pathway and meet proposed import conditions, taking into consideration the varying degrees of detail required for each trading partner. |