



**Australian Government**

**Department of Agriculture, Fisheries and Forestry**  
Australian Quarantine and Inspection Service

**Cost Recovery Impact Statement**

**Amendment to Charges for the Dairy Exports Programme**

**Purpose of Cost Recovery Impact Statement**

This proposal involves the amendment of the current charging arrangements for the delivery of audit, inspection and certification services for the Dairy Exports Programme (the Programme). This Cost Recovery Impact Statement (CRIS) highlights the rationale for the amendments to the charges and demonstrates compliance with the *Australian Government Cost Recovery Guidelines*. To effect the changes to the charges, amendments will be required to the *Export Control (Fees) Orders 2001* and *Export Inspection (Registration Establishment Charges) Regulations 1985* and the *Export Inspection (Service Charge) Regulations 1985*.

**Initial Policy Review**

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**Organisational Objectives**

The Australian Quarantine and Inspection Service (AQIS) is one of the business units within the Australian Government Department of Agriculture, Fisheries and Forestry (the Department). The Department is responsible for a wide range of issues including:

- Quarantine, export inspection and certification based on monitoring of food safety standards, which are essential for the maintenance of Australia's highly favourable animal and plant health status, and support Australia's position in global trade.

The role of the Department is to assist the Government to achieve its policy objectives and administer legislation in these areas by contributing to the following Outcome identified in the Department's Corporate Plan 2003-2006:

- Australian agricultural, fisheries, food and forestry industries that are based on sustainable management of and access to natural resources, are more competitive, self-reliant and innovative, have increased access to markets, are protected from diseases and are underpinned by scientific advice and economic research.

AQIS is an Output Group of the Department and contributes to the achievement of the Department's Outcome by meeting the following Output objective:

- To protect Australia's animal, plant and human health status and maintain market access through delivery of quarantine and export services.

AQIS provides the following performance information for the provision of effective export inspection services:

- Number of consignments in AQIS export markets where facilitation of release of cargoes is attributed to AQIS involvement.
- Rate of rejections of export consignments.
- Level of awareness of AQIS export services.

AQIS has a vital role in developing and delivering audit and inspection processes in relation to foods and food products prepared for export from Australia. These audit and inspection processes are delivered in order to mitigate food safety risks and maintain markets for the export of these products.

AQIS has the further function of certifying the export status of foods and food products for export. Maintaining access for Australian agricultural products to hundreds of overseas markets is an essential function. Export inspection, auditing and certification services contribute to the annual generation of an estimated \$21 billion in exports by the meat, grain, horticulture, fish, dairy, organic and live animal export industries.

The primary function of the Programme is to deliver audit and inspection services with respect to the export of milk and milk products from Australia. The Programme also issues certification in relation to the exported product's compliance with domestic and international standards and/or requirements at the request of the exporting client. A further function of the Programme is to provide an administrative, management and verification role in relation to the review of Export Establishments registered with AQIS and the maintenance of appropriate records for those Export Establishments. These functions are integral to the acceptance of products produced at those establishments by overseas import authorities.

Services provided by the Programme consist of the:

- inspection of milk and milk products at export registered establishments.
- audit and inspection of export registered establishments undertaking the preparation of milk and milk products for export to assess the hygiene of food preparation and storage areas and their compliance with importing country requirements.
- issue of export documentation for milk and milk products to certify compliance with domestic and importing country requirements.
- administration and maintenance of records for establishments registered with AQIS for export.
- communication of information in relation to known requirements for export of milk and milk products.

### **Should cost recovery be introduced?**

The major rationale for developing and implementing cost recovery is the improvement of equity in relation to access and the delivery of the Programmes services and is consistent with the 'beneficiary pays' principle. The operation of this principle is such that the users of government products or services, or those individuals or groups that have created a need for regulation should pay for the costs associated to the delivery of those regulatory functions. Cost recovery arrangements also provide an important means of improving the efficiency with which Australian Government products and services are provided and consumed.

The beneficiaries of the Programme's activities are participants in the Australian Dairy Export Industry. Exports of milk and milk products are required to meet food safety standards under the *Export Control (Milk and Milk Products) Orders 2005* to be eligible for export from Australia. In addition, international markets set strict guidelines and requirements in relation to the import of products into and across their borders. The Programme's regulatory involvement requires the delivery of inspection, audit and certification services to the Dairy Export Industry to ensure that products meet the relevant the export and import conditions prior to the product's export from Australia.

The costs incurred by the Programme in delivery of its regulatory activities are accurately identifiable. A separate budget is maintained for the Programme and monthly financial reporting provides opportunity for ongoing detailed review and analysis of revenues and expenses. The Programme also participates in regular activity analysis through AQIS' Activity Cost Analysis (ACA) surveys. These surveys are conducted quarterly and provide detail of the resources directed by the Programme toward the range of services it provides. The Programme's participation in the surveys allows for the accurate identification of costs involved in the delivery of particular services. The ability to accurately identify costs together with the ability to accurately identify resources directed towards the Programme's services provides a reliable basis for the determination of cost recovery charges.

The Programme has operated in a cost recovery environment since its inception in 1996. This experience, coupled with additional guidance from the *Australian Government Cost Recovery Guidelines*, provides a sound framework for the Programme's cost recovery policies and practices.

### **Mechanisms, including consultation, for monitoring ongoing efficiency and effectiveness of cost recovery arrangements**

Regular consultation with the Dairy Export Industry regarding the Programme's administration of cost recovery arrangements and the delivery of its regulatory responsibilities occurs through the Dairy Exports Industry Consultative Committee (DEICC). The DEICC comprises representatives from key industry sectors and is the principal consultative forum for AQIS and the Dairy Export Industry to consult on all issues arising from the management of Australia's export strategies for milk and milk products. Face to face meetings of the full Committee are scheduled twice per year.

More frequent and detailed consultation regarding the Programme's cost recovery activity occurs through the DEICC Charging Sub-Committee. Consultation through this forum provides additional opportunity for the Programme to keep industry participants abreast of the Programme's ongoing financial position and strategies. This forum also provides AQIS with a valuable opportunity to receive information on the changing dynamics and challenges facing the industry for consideration in the review of charges and associated recovery structures.

Details regarding the outcome of consultation are provided in the section "Outcomes of consultation with stakeholders".

### **Future cost recovery review arrangements**

Charges are reviewed on a regular basis as part of the routine governance of AQIS and the financial position of the Programme is also reported at all DEICC meetings. Any changes or potential changes to charges and charging arrangements are underpinned by expert industry consultation, experienced financial advice and are consistent with the *Australian Government Cost Recovery Guidelines*.

Domestic structural adjustment within the Dairy Export Industry, the drought and international exchange rates have, and will continue to have, a substantial impact on export activity. As a result, long-term forecasts regarding the level of industry activity are difficult to achieve with a desirable degree of certainty. In order to ensure that charging arrangements maintain the viability of the Programme, and remain responsive to export activity cost recovery arrangements are reviewed annually. This approach, which is strongly supported by the Dairy Export Industry, has been taken on the basis of the close alignment of recovery of costs with the level of industry activity and a

further review is planned for the 2008/2009 financial year with a view to implement further amendments if necessary.

In addition to this, the Programme will continue to monitor its performance against budget on a monthly basis and report on its financial position through established Governance processes including the AQIS Financial Analysis sub-Committee (FAsC) and the AQIS Leadership and Governance Committee (ALGC).

## **Design and Implementation**

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### **Who should pay cost recovery charges?**

Consistent with the 'beneficiary pays' principle the users of government products or services, or those individuals or groups that have created a need for regulation, should pay cost recovery charges or levies.

Services provided by the Programme that are included in its current cost recovery arrangements are:

- the physical inspection of milk and milk products produced at Export Establishments registered with AQIS to ensure that those products comply with relevant Export Control Orders and ensure their fitness for human consumption;
- the provision of inspection and auditing services to Export Establishments registered with AQIS to ensure and attest to the compliance of production premises and processes with the importing countries essential requirements;
- the provision of export certification services to certify compliance with importing country requirements.

These costs are recovered from the businesses and individuals who require the use of the Programme's services and have thus created the need for regulation. In the Dairy Export Industry these clients include:

- occupiers of Export Establishments registered with AQIS to process milk and milk products
- occupiers of Export Establishments registered with AQIS to store milk and milk products for export
- freight forwarders, agents, processors and exporters who request documentation to confirm that exported product complies with Australian export requirements and importing country requirements.

### **Should cost recovery charges be imposed using fees or levies?**

The costs of services provided by Programme are best recovered through the imposition of fees.

The Programme provides audit, inspection, documentation and administrative services to its individual clients in order to facilitate the export of their products. The costs of providing these services are easily identifiable through the Programme's budget, ongoing financial reporting and effort analysis surveys. Consumption of the Programme's services by particular clients is also easily identified as services are provided at the request of the client. Given the ability to accurately trace costs to the service provided and the ability to identify the consumption of services, fees are considered the most appropriate and effective mechanism for the recovery of costs.

## What are the legal requirements for the imposition of charges?

### Export Control Act 1982

Subsection 25(1) of the *Export Control Act 1982* ("the Act") provides that the Governor-General may make regulations, not inconsistent with the Act, prescribing matters required or permitted by the Act or necessary or convenient to be prescribed for the carrying out or giving effect to the Act.

Paragraph 25(2)(d) of the Act allows regulations to be made for the imposition of charges in connection with the performance of services by authorised officers and the remission of charges so imposed. Paragraph 25(2)(g) of the Act provides that the Governor-General may make regulations empowering the Minister to make orders, not inconsistent with the regulations, with respect to any matter for or in relation to which provision may be made by the regulations.

### Export Control (Fees) Orders 2001

The *Export Control (Fees) Orders 2001* details the fees imposed for the performance of services by authorised officers to approve auditors (Part 8) and the provision of documentation services (Part 5).

### Export Inspection (Establishment Registration Charges) Act 1985

The *Export Inspection (Establishment Registration Charges) Act 1985* imposes charges in relation to the registration of export establishments. These export establishments must be registered with AQIS for operations associated with the preparation of a prescribed commodity.

### Export Inspection (Establishment Registration Charges) Regulations 1985

Specific charges relating to the registration of export establishments for prescribed commodities are contained in the *Export Inspection (Establishment Registration Charges) Regulations 1985*. Regulation 4 specifies prescribed commodities to include dairy products. Regulation 6A provides for rates of charge for dairy establishments with the specific charges contained in Schedule 1A.

### Export Inspection (Service Charge) Act 1985

The *Export Inspection (Service Charge) Act 1985* imposes charges on the provision of dairy export services

### Export Inspection (Service Charge) Regulations 1985

Specific rates of charges are contained in Regulation 5 of the *Export Inspection (Service Charge) Regulations 1985*

The Programme is proposing to amend the fees provided under these Parts and associated Schedules.

It is proposed to remove the charges currently included in the *Export Inspection (Establishment Registration Charges) Act 1985* (for registration of export establishments) and charges previously included in the *Export Inspection (Service Charge) Regulations 1985* (for services provided by authorised officers relating to the provision of an export inspection service including audits and issue exemptions from the Export Control Orders). Services that are recovered through these

charges are provided at the request of the client and are deemed more appropriately as a fee-for-service rather than a levy or tax. It is proposed that these charges are to be incorporated into the *Export Control (Fees) Orders 2001* to more accurately reflect the charges as a fee-for-service.

### Which issues should the proposed legislation address?

The legislation will be amended to accommodate the proposed cost recovery structure so that the Programme will be able to recover its costs in 2007/2008. In accordance with AQIS policy, and at the Dairy Export Industry's request, the cost recovery arrangements will be reviewed annually. Cost recovery arrangements will be reviewed in consideration of changes within the Dairy Export Industry to assess the ongoing relevance of recovery arrangements and to introduce further amendments if necessary.

The existing and proposed fees, as reflected in the *Export Control (Fees) Orders 2001*, the *Export Inspection (Establishment Registration Charges) Regulations 1985* and the *Export Inspection (Service Charge) Regulations 1985*, are listed at **Appendix A**.

### Which costs should the charges include?

Charges applied by the Programme reflect the recovery of the costs of regulation. The Programme, together with the Dairy Export Industry, seeks to meet the commitment to recover the direct and indirect costs associated with managing the export inspection, administration, audit and certification services in a manner that is fair and equitable across the various sectors of the industry.

The total costs that will be incurred by the Programme as a result of its regulatory activities in 2007/2008 are estimated at \$1,908,184. These costs are included in the Programme's cost recovery charges and are summarised in the categories listed below. The projected costs for 2007/2008 incurred against these categories are also provided.

- Employee Expenses	\$927,884
- Supplier Expenses	\$407,502
- Electronic Documentation System (EXDOC)	\$330,287
- Establishment Registration System (ER)	\$16,379
- AQIS Overheads	\$161,670
- Departmental Overheads	\$54,732
- Depreciation and Amortisation	\$9,731
- <b>Total Costs of Regulatory Activities</b>	<b>\$1,908,184</b>

Direct costs, including Employee Expenses, Supplier Expenses, EXDOC and ER are attributed to the cost of providing the relevant service. Indirect costs, including AQIS Overheads, Departmental Overheads and Depreciation and Amortisation are allocated according to Activity Based Costing methodology. AQIS undertakes quarterly activity reporting from all staff providing services for the Programme. Analysis of the results allows for the effective identification and allocation of direct and indirect costs for each of the Programme's services. Programme services are organised into the following elements of service delivery;

- **Registration** – relating to administration and implementation of policy objectives to support the ongoing eligibility of Export Establishments registered with AQIS for export into overseas markets. These costs are responsive to the number of Export Establishments, the volume of

exports from those establishments and the degree of compliance required importing countries to maintain access to their markets.

- **Exemptions** - in relation to the issue of exemptions from export legislation. These costs arise from requests from registered establishments or exporters for exemption from export legislation that must be assessed to determine potential impact on food safety and market access.
- **Fee-for-service** – relating to inspection of product and audit for compliance with food safety and importing country requirements to support eligibility of the products export into overseas markets.
- **Documentation** – in relation to the issuance of export permits and the provision of export documentation to facilitate the entry of eligible products into desired markets.

Further details regarding the Programme's costs in relation to the provision of particular services are provided at **Appendix B**.

All Programme costs are assessed against the results of the activity analysis to obtain the total cost of providing a particular service delivery element. Effort analysis results are not applied to EXDOC or ER with those costs being wholly attributed to *Electronic Documentation Fees and Registration Fees* as applicable. This process ensures that the total costs for each element of service delivery, upon which cost recovery charges are to be based, accurately reflects the cost of undertaking the particular activity

In November 2001, the Federal Government initiated a 40% contribution towards the cost of AQIS export charges (the Government Export Contribution). In accordance with this policy the costs of the services provided by the Programme are now met through:

- 60% cost recovery from industry
- 40% cost recovered by way of a contribution from the Federal Government

The Government Export Contribution is calculated against revenues received by AQIS from industry. For every \$0.60 received from Industry a Government contribution of \$0.40 applies. Taken together these revenues recover the cost of each dollar of service provided by the Programme. As such, the costs included in the charges represent 60% of the total costs incurred by the Programme in the delivery of its regulatory activities.

### **How should the charges be structured?**

The current fee structure represents cost recovery arrangements that were appropriate to activities when the Programme was established in July 1996. Since the formation of the Programme fees for the recovery of the its costs have been reviewed in July and November 2001. The review conducted in July 2001 resulted in a 1% increase to all fees to cover additional costs incurred by the Programme in relation to the implementation of EXDOC, AQIS' electronic export documentation system. The review conducted in November 2001 was undertaken as a result of the introduction of the Government Contribution and resulted in a 40% reduction of all charges recovered from industry.

Since the last amendments to the Programme's charging arrangements in 2001 there have been significant changes in external factors that influence the activities of the Dairy Export Industry. These changes, which have arisen primarily from drought and the domestic deregulation of the

dairy industry, have caused a notable reduction in industry participation. In more recent times the Dairy Export Industry has been the subject of increased scrutiny and review from importing countries. These factors have resulted in significant changes to the nature of services that are provided by the Programme, an increase in demand for the Programme's services and subsequently, an increase in the costs associated with the delivery of those regulatory activities.

In response to the increases in the Programme's costs, and in the face of changing industry conditions, a comprehensive review of the Dairy Export Programme's charges and charging structure was undertaken. This review was undertaken in consultation with the Dairy Export Industry Consultative Committee (DEICC) Charging Sub-Committee to ensure the outcomes were favourable to Government and Industry regulatory objectives and supports this proposal.

The principles for setting charges and recovery structures for the Programme are such that;

- Fees reflect the actual cost of providing the particular service
- Fees are set to ensure that individuals or firms using a particular service are those charged for that service
- Fees are set so as to encourage best practice within the Dairy Export industry, and through this, encourage the most efficient use of Programme resources

The Government Export Contribution is applied to the Programme's charges in a manner that meets the charging principles and is incorporated into the charging structure under the following conditions;

- That 100% cost recovery should be applied to services where the client is able to minimise their consumption of those services including: These services include:
  - Some documentation charges, specifically manual export documentation and replacement certificates
  - Fee for service charges for audit and inspection
  - Exemptions from export legislation

This approach encourages the implementation of best practice processes by the client and encourages increased compliance with export legislation and relevant importing country requirements.

- That the 40% export contribution is applied to the remainder of the Programme's services and associated costs where the service is a function that is required to enable exports. This applies to:
  - Electronic export documentation
  - Establishment registration

Charges for the recovery of the Programme's costs are structured into four categories corresponding with the Programme's service delivery elements;

- Establishment Registration Charges – for the recovery of administrative costs required to maintain the eligibility of Registered Establishment to export to desired markets
- Fee-for-service Charges – for the recovery of inspection costs
- Export Documentation Charges – for the recovery of documentation costs
- Exemption charges – for the recovery of costs associated with the issue of exemptions

Full cost recovery is applied to fee for service and to encourage efficient audit practices, compliance with export legislation and importing country requirements.

Full cost recovery is applied to exemption services to discourage applications ensuring that only applications that are fully considered and justified are submitted.

The use of electronic documentation provides efficiencies for the Dairy Export Industry and enhanced traceability of export documentation for AQIS and importing countries. The Government Export Contribution is applied to Electronic Export Documentation to reduce costs passed to the client to encourage its use in favour of manual documentation.

Importing countries require that establishments used in the preparation of milk and milk products, and the products produced at those establishments, meet prescribed hygiene and quality requirements. The Programme provides an essential function in monitoring and assessing compliance with these conditions and costs relating to this function are recovered through Establishment Registration charges. The Government Export Contribution is applied to these charges as the services are an essential function that is required to enable exports from those establishments.

Detail regarding the application of the Government 40% export contribution is provided at **Appendix C**.

#### **Amendments to charges**

Since 1 July 2001 the Programme has incurred an 87% increase in the costs of the delivery of its regulatory activities. This increase in costs is partly attributed to successive increases in employee expenses as a result of salary increases of 4% per annum payable to staff in accordance with the Agriculture Fisheries and Forestry Collective Agreements 2003-2006 and 2006-2009. The increased regulatory involvement has required the engagement of an additional three staff in the Programme. The additional staff have been utilised in;

- The development, systematic implementation and maintenance of documented procedures with the increased rigour that is required to ensure that Importing Countries accept the Australian dairy export inspection system.
- The development, implementation, maintenance of the Dairy Export Program Operations Manual (DEPOM) which is a key component in order to substantiate and demonstrate the effectiveness of the Australian Dairy Export Inspection System to Importing Countries.

The Programme's supplier expenses, with specific emphasis on those related to travel, accommodation and information technology and communications, have also incurred a substantial increase due to the increased regulatory involvement over the period and the engagement of additional staff to undertake those functions.

Details of the increases in the Programme's costs since the last review of fees in 2001 are provided at **Appendix D**.

Comprehensive cost modelling and analysis has been undertaken by the Programme and AQIS Finance in an effort to calculate the precise charges for the efficient and effective recovery of costs. Revenues are modelled so as to recover 60% of costs reflecting that the situation that a Government Export Contribution will be received to cover the remaining costs. At the request of the Dairy

Export Industry, the cost modelling has also endeavoured to create a recovery structure that encourages sound industry practices.

As previously identified, the Government Export Contribution has only been applied to registration and electronic documentation fees. The Government Export Contribution has not been applied to fee for service, manual export documentation, replacement certificates and exemptions in line with the principles for the use and application of the Government Export Contribution and a clear policy position of the Dairy Export Industry. As a consequence, the application of the Government Contribution has been significantly amended since it was first applied in 2001. This has resulted in a situation where some fees have experienced a greater increase than others.

#### **a) Establishment Registration Charges**

The requirement to register facilities with AQIS for export is to ensure that the premises construction and equipment is suitable for the preparation of prescribed goods for export as food and to confer responsibility on occupiers to meet all of the requirements of Export Control Orders relating to the products they wish to prepare for export. This is an essential service in order to satisfy importing authorities that particular standards are met prior to the export of goods to their respective countries and to maintain the highly favourable export status of Australian foods. Export registration is initiated by occupiers who request the service to enable their milk and milk products to be exported.

Charges for Registration have not been reviewed since the introduction of the Government Export Contribution in 2001. Since the last revision of Registration charges the overall number of Export Establishments from which these costs can be recovered have reduced, particularly during 2006/2007. These reductions are directly attributable to effects of drought, milk supply, greater competition in international trade with the changes to the value of the Australian dollar and increasing requirements of importing countries arising from the scrutiny of the importing country reviews. The increases in Establishment Registration charges under this proposal reflect the actual increase in costs and the decrease in the number of industry participants.

Establishments are categorised on the basis of the volume of output which directly correlates to the size and complexity of operations undertaken at those Establishments. Those establishments that are larger in the size and complexity of their operations require additional effort from the Programme to ascertain and attest to their compliance with domestic and international requirements. This differentiation is reflected by the various rates for Registration.

Charges for the recovery of Registration services already exist within the Programme's current charging structure. This proposal seeks to amend the rates for those charges.

The current and proposed charges are provided in the table below;

Description	Current Charge with Govt Cont applied	Proposed Charge with Govt Cont applied	% Difference
<b>REGISTRATION</b>			
<b>Registration - Dairy</b>			
Corporation/Co-operative exporting > 2000tns	2,550.00	2,654.00	4.08%
Corporation/Co-operative exporting < 2000tns	1,410.00	1,468.00	4.11%
Storage establishment - Dairy	600.00	625.00	4.17%
Application transfer registration - Dairy	300.00	300.00	0.00%
Co-op exporting <200 Tonnes Multicommodity	1,410	1,468.00	4.11%
Storage establishment - Multicommodity (dairy)	600	625.00	4.17%

Detail of the method applied to calculate for the proposed Registration charges is provided at **Appendix E**.

### b) Fee-for-Service (FFS)

AQIS provides inspection services to export establishments for registration purposes and to ensure milk and milk products comply with the *Export Control (Milk and Milk Products) Orders 2005* for export as milk and milk products for human consumption.

Costs associated to the delivery of inspection services are determined by the amount of resources/effort directed toward the delivery of FFS activities as a percentage of overall costs. This effort is identified through regular activity analysis, through the ACA survey, with the resulting percentage applied to the total cost. The Dairy Export Industry has advised that the cost modelling resulted in the additional benefit of delivering a fee that is comparable to commercial and State Regulatory Authority fees, confirming that this is a sound outcome for the Dairy Export Industry.

Charges for the recovery services identified as a Fee-for-Service already exist within the Programme's current charging structure. This proposal seeks to amend the rates for those charges.

The current and proposed charges are provided in the table below;

<b>FEE FOR SERVICE</b>			
FFS - Min charge 1/2 hour	30.00	67.00	123.33%

Detail of the method applied to calculate for the proposed Registration charges is provided at **Appendix F**.

#### *Approved Arrangements Fee for Service*

The implementation of the *Export Control (Milk and Milk Products) Orders* has required establishments to have an approved arrangement as a condition of registration. The initial approval has occurred by a one-off audit by AQIS staff. In 2006-07 the majority of audits were completed however, the limited resources available to audit has led to a residual number of audits (25-30) to be performed in 2007-08. For equity reasons it is proposed to introduce a new charge that will allow the Programme to maintain the rate at \$30 per quarter hour rate for completion of these audits.

<b>FEE FOR SERVICE - APPROVED ARRANGEMENTS</b>			
FFS - Min charge 1/2 hour	30.00	30.00	0.00%

### c) Export Documentation

AQIS provides Export Documentation to facilitate the entry of product into overseas markets. Export Documentation is delivered both electronically, through the AQIS export documentation system (EXDOC), and manually, by Programme staff through direct liaison with the client. Costs relating to the delivery of export certification fall into three sub-categories;

#### *Electronic documentation*

In most circumstances Electronic Export Documentation is delivered to clients via direct interaction with the EXDOC system, requiring no additional involvement from Programme staff. In some circumstances however Programme staff are required to intervene in the process to review and authorise information submitted by the client. To differentiate between the two services, and ensure appropriate recovery of the additional effort provided where the Programme is required to intervene, charges for the recovery of Electronic Documentation services are broken into two categories;

- Electronic Documents that are issued from the EXDOC system without intervention by the Programme and,
- Electronic Documents that are issued from the EXDOC system but require the intervention of the Programme to review and authorise the document.

Separate charges that recognise the difference in effort required to deliver Electronic Documentation services already exist within the Programmes charging structure. This proposal seeks to amend the rates for those charges.

The current and proposed charges are provided in the table below;

<b>DOCUMENTATION</b>			
<b>Electronic documentation</b>			
EXDOC Electronic Certificate requiring AQIS intervention	9.00	15.00	66.67%
EXDOC Electronic Certificate	6.00	6.00	0.00%

#### *Manual documentation*

Since 2001 electronic documentation delivered through the EXDOC system has become the primary mechanism adopted by the Dairy Export Industry for issuance of export documentation. The Programme continues to provide Manual Documentation services to clients where the client elects not to utilise the Electronic Documentation services provided by the Programme. Manual Documentation services require the direct involvement of AQIS staff to ensure compliance with domestic and importing country requirements. The physical review of such requirements requires a significantly higher labour-intensive effort for to perform the physical checks of information that would otherwise be automatically checked through the EXDOC system. The issuance of manual documentation has eliminated any economies of scale that may have existed for Manual Export

Permits and Manual Certificates of Condition and level of effort required to deliver any form of manual documentation is now consistent for all manual documentation services.

Charges for the recovery of Manual Documentation services already exist within the Programme's current charging structure. This proposal seeks to amend structure of the recovery of Manual Documentation services to a single rate reflecting the consistency of effort required to deliver those services.

The current and proposed charges are provided in the table below;

DOCUMENTATION			
<b>Manual Documentation</b>			
Export Permit / Certificate as to Condition	25.00	113.00	352.00%
Any other document (letterhead statements etc)	50.00	113.00	126.00%

### *Replacement documentation*

AQIS provides export certification to facilitate the entry of product into overseas markets. At the client's request, certificates may need to be replaced to correct errors or amend information. On occasion the requirement for a replacement certificate unavoidable and may result from the direction of foreign import officials. This circumstance makes the provision of replacement documentation crucial to the acceptance of the product by foreign import officials and precludes any option for AQIS to issue a 'new' certificate.

The provision of a replacement certificate requires extensive liaison with AQIS officials in remote locations or overseas posts and liaison with foreign government officials to negotiate entry of product. These activities result in significant time spent co-ordinating the information and representations required to negotiate and produce appropriate replacement documents. This additional time and effort attracts a substantially higher cost than other forms of documentation.

Charges for the recovery of Replacement Documentation services already exist within the Programmes current charging structure. This proposal seeks amend the rates for those charges.

The current and proposed charges are provided in the table below;

DOCUMENTATION			
<b>Replacement Certificate</b>			
Replacement Certificate	150.00	301.00	100.67%

Detail of the method applied to calculate for the proposed Documentation charges is provided at **Appendix G**.

### **d) Exemptions**

On occasion registered establishments may request that some sections of the export legislation not apply for a given timeframe or set of conditions. To act on this request an application for exemption is received from the establishment which is then assessed and processed by AQIS. Each application must be assessed to ensure that approval will not jeopardise market access for the client

and more broadly for the Dairy Export Industry. In addition, food safety requirements must not be jeopardised by the issue of exemptions.

Charges for the recovery of Exemption services already exist within the Programme's current charging structure. This proposal seeks to amend the structure for the recovery of Exemption service costs and to amend the rates for the recovery of those services.

The costs of providing Exemption services are recovered through three separate charges. Each charge comprises a base rate, calculated from the costs of providing exemption services and a forecasted number of applications. The base rate is set so as to fully recover the costs of providing Exemption services. For secondary, tertiary and subsequent applications, an additional pecuniary charge is applied to deter vexatious use of the exemption provisions. The additional charges are not within the scope of this Cost Recovery Impact Statement and are discussed only for the information of the reader.

Under the current charging structure a Government Export Contribution is applied to Exemption charges. The new proposal seeks to remove the Government Export Contribution and bring Exemption charges into line with the principles for the application of the Government Export Contribution. These principles are outlined under the section "***How should the charges be structured?***"

The current and proposed charges are provided in the table below. The table provides the base rate and the final rates for "Second" and "Third/Next" which includes the additional pecuniary charge;

EXEMPTIONS	Current Cost Recovery Rate	Final Rate	Proposed Cost Recovery Rate	Proposed Final Rate	
Exemptions - First app - commence 12 months	90.00	170.00	170.00	170.00	88.89%
Second app - within 12 months	90.00	284.00	170.00	284.00	89.33%
Third/next app - within 12 months	90.00	567.00	170.00	567.00	89.00%

Detail of the method applied to calculate for the proposed Exemption charges is provided at **Appendix H**.

### **How should costs be calculated and allocated?**

The AQIS Fees and Charges Policy states that Programmes should ideally endeavour to fully recover their costs in the year they are incurred. Charges are set so as to allow for the full recovery of costs and are also set at a level to avoid sustained over or under recoveries in future years. Cost recovery outcomes are fully detailed in the AQIS Report to Clients, which is produced annually and is available on the AQIS website.

The AQIS Report to Clients provides the following information to clients:

- Current year results;
- Accumulated results taking into consideration prior years; and
- Details of any funds held in industry liability accounts.

Stringent budgeting and financial reporting arrangements within AQIS coupled with effective mechanisms to employ Activity Based Costing analysis ensure that charges have been formulated to properly reflect the costs of providing the activity.

Details of the calculation of charges for the categories of Programme services are provided at;

- Appendix E for Registration charges
- Appendix F for Fee-for-Service charges
- Appendix G for Documentation charges
- Appendix H for Exemption charges.

As part of AQIS' cost recovery arrangements over and under-recoveries are managed through Industry Equalisation Accounts (IEA) held for each of the AQIS cost recovered Programmes. The principle purpose of the IEA is to enable AQIS and Industry to manage any unforeseen downturns or in the recovery of expenditure for each industry. As agreed with the relevant industry the IEAs should ideally hold between 5% and 10% in reserves.

Successive deficits incurred by the Dairy Export Programme in 2005/2006 and 2006/2007 have depleted all reserves held in the Dairy IEA. At the request of the Dairy Export Industry Consultative Committee (DEICC) Charging Sub-committee the Government Export Contribution has been applied in a manner which allows for the generation of a surplus in 2007/2008 that will be sufficient to restore reserves to 10%. This surplus is primarily derived from the completion of Approved Arrangements activities in 2007/2008. Approved Arrangements activities are a non-recurrent activity that will no longer be conducted after the 2007/2008 financial year.

Details of the costs and revenues arising from the Programme's proposal outlined in this CRIS are provided at **Appendix I**.

In accordance with AQIS policy for fees and charges, and to ensure that the Programme's charging structure does not include an inherent over-recovery the Programme is committed to review costs and associated fees and charges on an annual basis. This approach is essential for the Programme to remain responsive to the vagaries of overseas demand, environmental and climatic changes faced by the Dairy Export Industry if it is to remain viable in the future.

Further details are available in the AQIS Fees and Charging Policy ([link below](#))

[AQIS Fees and Charges Policy](#)

### **Outcomes of Consultation with Stakeholders**

AQIS has consulted extensively with the Dairy Export Industry Consultative Committee (DEICC) regarding the proposed increase in charges. DEICC consists of representatives of export registered establishments (small, medium and large; processing and storage), exporters (small and large), State Regulatory Authorities, Dairy Australia and AQIS. Membership is not capped to ensure that all interested parties are able to contribute to the consultative process.

Specific consultation on the changes to the charges has been undertaken through the DEICC Charging Sub-Committee. The sub-committee findings have been presented to the full membership of DEICC and AQIS has obtained unquestioned endorsement and support for the proposed increase in charges.

The Dairy Export Programme will further notify its clients of the revised charging arrangements through the established process of writing to each known client and by updating the 'Fees and Charging Guidelines' on the AQIS website.

The Programme policy on transparency and of forewarning industry of changes has placed it in a good position for managing any future charging reviews. The AQIS Finance area has ensured consistent policy application in the development of the charging structure across various Programmes.

**Certification**

I certify that this CRIS applies the *Australian Government Cost Recovery Guidelines*.

STEPHEN HUNTER



Executive Director  
AQIS  
Date: \_\_\_\_\_



APPENDIX A

<b>DAIRY EXPORTS PROPOSED FEES AND CHARGES</b>			
Description	Current Charge with Govt Cont applied	Proposed Charge with Govt Cont applied	% Difference
<b>REGISTRATION</b>			
<b>Registration - Dairy</b>			
Corporation/Co-operative exporting > 2000tns	2,550.00	2,654.00	4.08%
Corporation/Co-operative exporting < 2000tns	1,410.00	1,468.00	4.11%
Storage establishment - Dairy	600.00	625.00	4.17%
Application transfer registration - Dairy	300.00	300.00	0.00%
Co-op exporting <200 Tonnes Multicommodity	1,410	1,468.00	4.11%
Storage establishment - Multicommodity (dairy)	600	625.00	4.17%
<b>FEE FOR SERVICE</b>			
FFS - Min charge 1/2 hour	30.00	67.00	123.33%
<b>FEE FOR SERVICE - APPROVED ARRANGEMENTS</b>			
FFS - Min charge 1/2 hour	30.00	30.00	0.00%
<b>EXEMPTIONS*</b>			
Exemptions - First app - commence 12 months	90.00	170.00	88.89%
Second app - within 12 months	150.00	284.00	89.33%
Third/next app - within 12 months	300.00	567.00	89.00%
<b>DOCUMENTATION</b>			
<b>Electronic documentation</b>			
EXDOC Electronic Certificate requiring AQIS intervention	9.00	15.00	66.67%
EXDOC Electronic Certificate	6.00	6.00	0.00%
<b>Manual Documentation</b>			
Export Permit / Certificate as to Condition	25.00	113.00	352.00%
Any other document (letterhead statements etc)	50.00	113.00	126.00%
<b>Replacement Certificate</b>			
Replacement Certificate	150.00	301.00	100.67%

**Notes:**

- Exemption rates listed in the table above include additional pecuniary charge for the "Second app – within 12 months" and "Third/next app – within 12 months" charges. Exemption rates are further discussed under the heading "*Amendments to charges*".

APPENDIX B

# Cost Allocation

	Budget 2007-2008	Registration 57.72%	FFS 11.95%	Exemptions 0.26%	Documentation 30.07%
<b>Activity Cost Assessment Analysis (%)</b>					
<b>Employee Expenses</b>					
Employee Expenses	927,884	535,602	110,882	2,389	279,011
<b>Supplier Expenses</b>					
Consultancy Services	403	233	48	1	121
General Office Supplies	7,859	4,537	939	20	2,363
Governance	944	545	113	2	284
HR Services	131	76	16	0	40
IT Comms and Office Equipment	87,119	50,288	10,411	224	26,196
Legal	3,002	1,733	359	8	903
Memberships and Conferences	4,347	2,509	519	11	1,307
Official Hospitality	1,853	1,069	221	5	557
Other Administrative	28,879	16,670	3,451	74	8,684
Property and Accomodation	53,461	30,859	6,389	138	16,075
Purchase of Publications	692	400	83	2	208
AQIS Overheads	161,670	93,320	19,320	416	48,613
<i>Electronic Documentation System</i>	330,287	-	-	-	330,287
<i>Establishment Registration System</i>	16,379	16,379	-	-	-
Technical and Field	56,816	32,796	6,790	146	17,084
Temporary and Contract Staff	2,181	1,259	261	6	656
Travel	133,473	98,037	20,296	-	-
Vehicles	26,341	21,823	4,518	-	-
<b>Other Expenses</b>					
Departmental Overheads	54,732	31,593	6,540	141	16,458
Depreciation & Amortisation	1,017	587	122	3	306
Write Down of Assets	8,714	5,030	1,041	22	2,620
<b>Totals</b>	<b>1,908,184</b>	<b>945,344</b>	<b>192,318</b>	<b>3,609</b>	<b>751,773</b>
<b>FTEs</b>	<b>9.2</b>	<b>5.3</b>	<b>1.1</b>	<b>0.0</b>	<b>2.8</b>

APPENDIX C

<b>DAIRY EXPORTS PROPOSED FEES AND CHARGES</b>			
Description	Proposed Charge at Full Cost Recovery	Proposed Charge with Govt Cont applied	% of Cost Contributed by Government
<b>REGISTRATION</b>			
<b>Registration - Dairy</b>			
Corporation/Co-operative exporting > 2000tns	5,897.00	2,654.00	54.99%
Corporation/Co-operative exporting < 2000tns	3,261.00	1,468.00	54.98%
Storage establishment - Dairy	1,388.00	625.00	54.97%
Application transfer registration - Dairy	458.00	300.00	34.50%
Co-op exporting <200 Tonnes Multicommodity	3,261	1,468.00	54.98%
Storage establishment - Multicommodity (dairy)	1,388	625.00	54.97%
<b>FEE FOR SERVICE</b>			
FFS - Min charge 1/2 hour	67.00	67.00	0.00%
<b>EXEMPTIONS</b>			
Exemptions - First app - commence 12 months	170.00	170.00	0.00%
Second app - within 12 months	284.00	284.00	0.00%
Third/next app - within 12 months	567.00	567.00	0.00%
<b>DOCUMENTATION</b>			
<b>Electronic documentation</b>			
EXDOC EX28 RFP Health Certificate	29.00	15.00	48.28%
EXDOC EX222 RFP Health Certificate	12.00	6.00	50.00%
<b>Manual Documentation</b>			
Export Permit / Certificate as to Condition	113.00	113.00	0.00%
Any other document (letterhead statements etc)	113.00	113.00	0.00%
<b>Replacement Certificate</b>			
Replacement Certificate	301.00	301.00	0.00%

**Notes:**

- The Government Export Contribution is applied to Programme services where the service is an essential function that is required to enable exports.

APPENDIX D

<b>DAIRY EXPORTS</b>			
<b>Cost Increases 2001-2007</b>			
	2001/2002	2007/2008	% Increase
<b>Employee Expenses</b>			
Employee Expenses	392,467	846,685	116%
<b>Supplier Expenses</b>			
Consultancy Services	-	408	100%
General Office Supplies	14,232	7,854	-45%
Governance	843	880	4%
HR Services	7,845	1,687	-79%
IT Comms and Office Equipment	47,890	76,456	60%
Legal	1,042	2,745	163%
Memberships and Conferences	414	4,344	949%
Official Hospitality	991	1,848	87%
Other Administrative	30,238	29,842	-1%
Property and Accommodation	47,786	49,214	3%
Public Relations and Marketing	341	-	-100%
Purchase of Publications	1,152	696	-40%
AQIS Overheads	501,090	718,643	43%
<i>Electronic Documentation System</i>	386,427	393,356	2%
<i>Establishment Registration System</i>	11,247	27,445	144%
Technical & Field	667	56,796	8419%
Temporary & Contract Staff	615	2,184	255%
Travel	32,592	148,608	356%
Vehicles	5,255	26,340	401%
<b>Other Expenses</b>			
Departmental Overheads	-	56,062	100%
Depreciation & Amortisation	1,075	2,938	173%
Write Down of Assets	2,260	5,523	144%
<b>Total Costs</b>	<b>1,088,795</b>	<b>2,039,752</b>	<b>87%</b>

**Notes:**

- Technical and Field – the increase in Technical and Field Costs results from a change in the accounting approach for services provided on behalf of the Dairy Export Programme in locations where there is no Dairy Export Programme presence. Services in these locations are provided by other AQIS Export Programmes and costs are recovered from the Dairy Export Programme. This arrangement was previously recognised as an adjustment to Dairy Export Programme revenues, the accounting approach has been revised for the 2007/2008 financial year and these services are now correctly recognised as a Technical and Field expense.
- Memberships and Conferences – the increase in Memberships and Conferences Costs results from a change in the accounting approach for staff attendance at conferences. These costs were previously allocated to Employee Expenses, the accounting approach has been revised for the 2007/2008 financial year and costs are now correctly recognised as a Memberships and Conferences expense.

APPENDIX E

<b>Registration Costs</b>			
<b>Costs</b>			
Registration Costs			945,344
<b>Rates</b>			
2007-2008 Projected Revenue at full charge			
Category	No of Est	Rate	Revenue
SPDR1 - Corporation/Co-operative exporting>2000tns	47	4,250	199,750
SPDR2 - Corporation/Co-operative exporting<2000tns	112	2,350	263,200
SPDR3 - Storage establishment - Dairy	164	1,000	164,000
SPDR4 - Application transfer registration - Dairy	7	330	2,310
SDPR2M - Co-op exporting < 200 Tonnes Multicommodity	7	2,350	16,450
SDPR3M - Storage Establishment Multicommodity	-	1,000	-
<b>Dairy Estab Sub-total</b>	<b>337</b>		<b>645,710</b>
SPFR01Ma - Storage establishment multi commodity	45	1,556	70,008
SPFR05Ma - Single line processing - Land Establishment Multi Commodity	3	2,100	6,300
SPFR06Ma - Multi line processing - Land Establishment Multi Commodity	2	2,408	4,816
<b>Multicommodity establishment subtotal</b>	<b>50</b>		<b>81,125</b>
<b>Total Establishments</b>	<b>387</b>		<b>726,835</b>
Increase required to meet 2007-2008 Registration Costs			
2006-2007 Registration Costs to be recovered	895,858		
2006-2007 Projected Revenue @ current rate (excl Multicommodity)	645,710		
Additional revenue required	250,148		
% increase on projected revenue	38.74%		
2007-2008 projected revenue with Government Export Contribution applied			
Category	No of Est	Required Rate (incl Govt Export Contribution)	Revenue
SPDR1 - Corporation/Co-operative exporting>2000tns	47	5,896.45	277,133
SPDR2 - Corporation/Co-operative exporting<2000tns	112	3,260.39	365,164
SPDR3 - Storage establishment - Dairy	164	1,387.40	227,533
SPDR4 - Application transfer registration - Dairy	7	457.84	3,205
SDPR2M - Co-op exporting < 200 Tonnes Multicommodity	7	3,260.39	22,823
SDPR3M - Storage Establishment Multicommodity	-	1,387.40	-
<b>Dairy Estab Sub-total</b>	<b>337</b>		<b>895,858</b>
SPFR01M - Storage establishment multi commodity	45	949.00	42,705
SPFR05M - Single line processing - Land Establishment Multi Commodity	3	1,281.00	3,843
SPFR06M - Multi line processing - Land Establishment Multi Commodity	2	1,469.00	2,938
<b>Multicommodity establishment subtotal</b>	<b>50</b>		<b>49,486</b>
<b>Incl. Govt Cont on Multicommodity Estabs</b>			<b>32,991</b>
<b>Totals</b>	<b>387</b>		<b>945,344</b>

**Notes:**

- Costs of Registration services are recovered from the current volume of clients with an Export Registration
- The increase required is calculated on total cost and applied equally to the individual charges
- Registration charges are initially calculated for full cost recovery. Rates charged to industry are calculated following the application of the Government Export Contribution as provided in Appendix C.

**APPENDIX F**

<b>Fee For Service Costs</b>	
Fee For Service Costs	192,318
<b>Required Fee For Service Rate</b>	
Fee For Service Costs	192,318
Full Time Equivalent Employees undertaking Fee For Service	1.10
Annual Hours available per Full Time Equivalent	1,650
Total FFS Hours available for recovery of costs	1,814
Direct Chargeable FFS Hours (60%)	726
Cost per Hour	265.04
<b>Cost per Quarter Hour</b>	<b>66.26</b>

**Notes:**

- Costs for Fee-for-Service services are calculated from the number of hours available over which those costs can be recovered.
- Full Time Equivalent Employees undertaking Fee For Service activity is derived from Cost Allocation analysis
- Annual Hours available per FTE take into account Annual Leave entitlements
- Direct chargeable hours represent actual time spent with the client. (Remaining hours reflect time spent on the preparation of reports and include time required to travel to and from the client's place of work).

APPENDIX G

<b>Documentation</b>	
<b>Costs</b>	
<b>Documentation</b>	<b>Budget 06/07</b>
Electronic Documentation Systems Costs (EXDOC)	330,287
General Documentation Costs	421,487
<b>Total</b>	<b>751,773</b>
<b>Documentation Rate</b>	
<b>Effort directed to Documentation activities by FTEs delivering Documentation Services</b>	
Electronic Documentation requiring Programme intervention	30%
Manual Documentation	35%
Replacement Documentation	35%
<b>Electronic Documentation</b>	
Electronic Documentation Costs	330,287
No of Electronic certificates issued	29,624
<b>Cost per electronic document</b>	<b>11.15</b>
<b>Cost per Autoclear permit</b>	<b>11.15</b>
Electronic Documentation Effort	126,446
No of AQIS Authorised permits	7,209
Additional cost per AQIS Authorised permit	17.54
<b>Total cost per AQIS authorised permit</b>	<b>28.69</b>
<b>Manual Documentation</b>	
Manual Documentation Effort	147,520
No of manual documents issued	1,315
<b>Cost per manual document</b>	<b>112.18</b>
<b>Replacement Documentation</b>	
Replacement Documentation effort	147,520
No of replacement documents issued	491
<b>Cost per replacement document</b>	<b>300.45</b>

**Notes:**

- Charges for Electronic Export Documentation are calculated by taking cost of EXDOC system over the total number of electronic documents issued.
- General Documentation costs are derived from Cost Allocation analysis.
- Effort directed to Documentation activities by FTEs delivering Documentation services is taken from Activity Cost Assessment information. This data is used to allocate General Documentation costs to specific documentation activities.

**APPENDIX H**

<b>Exemptions</b>					
<b>Costs</b>					
Exemption Costs	3,609				
<b>Rates</b>					
2007-2008 Projected Revenue at full charge					
Category	No of Exm	Base Rate	Base Rate Revenue	Proposed Rate (incl. deterrent charge)	Total Revenue
Exemptions -First app - commence 12 months	11	90	1020	90	1,020
Second app - within 12 months	7	90	630	150	1,050
Third/next app - within 12 mth	3	90	270	300	900
<b>Total</b>	<b>21</b>		<b>1920</b>		<b>2,970</b>
Increase required to meet 2007-2008 Exemption Costs					
2006-2007 Exemption Costs to be recovered	3,609				
2006-2007 Projected Revenue @ current base rate	1,920				
Additional revenue required	1,690				
% increase on projected revenue	88.02%				
2007-2008 projected revenue with increase applied					
Category	No of Exm	Required Base Rate	Base Rate Revenue	Proposed Rate (incl. deterrent charge)	Total Revenue
Exemptions -First app - commence 12 months	11	170	1,926	170	1926
Second app - within 12 months	7	170	1,190	286	2002
Third/next app - within 12 mth	3	170	510	570	1710
<b>Total</b>	<b>21</b>		<b>3,626</b>		<b>5,638</b>

**Notes:**

- Costs of Exemption services are recovered from the clients requesting Exemption services
- The increase required is calculated on total cost and applied equally to the individual charges
- Exemption costs are derived from Cost Allocation Analysis

**APPENDIX I**

<b>DAIRY EXPORTS FEES AND CHARGES 2007/2008</b>						
Description	07/08 Projected Expenditure	Current Charge with Govt Cont applied		Proposed Charge with Govt Cont applied		Balance
		(a)	(b)	(c)	(c)-(a)	
<b>REGISTRATION</b>	<b>945,281</b>					<b>189,421</b>
Registration - Dairy Corporation/Co-operative exporting > 2000tns Corporation/Co-operative exporting < 2000tns Storage establishment - Dairy Application transfer registration - Dairy Co-op exporting <200 Tonnes Multicommodity Storage establishment - Multicommodity (dairy)	862,805	2,550.00 1,410.00 600.00 300.00 1,410 600	5,897.00 3,261.00 1,388.00 458.00 3,261.00 1,388.00	2,654.00 1,468.00 625.00 300.00 1,468.00 625.00	(c)-(a) 4.08% 4.11% 4.17% 0.00% 4.11% 4.17%	673,383 207,897 274,027 170,833 3,500 17,127
Registration - Multicommodity Establishments Storage establishment multi commodity (fish) Single line processing - Land Establishment Multi Commodity Multi line processing - Land Establishment Multi Commodity	82,477	949 1,281 1,469	949 1,281 1,469	949.00 1,281.00 1,469.00	0.00% 0.00% 0.00%	82,477 71,175 6,405 4,897
<b>FEE FOR SERVICE</b>	<b>190,383</b>					<b>135,684</b>
FFS 1/4 hour - (Min charge 1/2 hour)		30.00	67.00	67.00	123.33%	326,067
<b>EXEMPTIONS</b>	<b>5,607</b>					<b>3,942</b>
Exemptions - First app - commence 12 months Second app - within 12 months Third/next app - within 12 months		90.00 150.00 300.00	170.00 284.00 567.00	170.00 284.00 567.00	88.89% 89.33% 89.00%	3,400 3,313 2,835
<b>DOCUMENTATION</b>	<b>751,773</b>					<b>146,578</b>
Electronic documentation EXDOC EX28 RFP Health Certificate EXDOC EX222 RFP Health Certificate	456,733	9.00 6.00	29.00 12.00	15.00 6.00	66.67% 0.00%	52,358 180,225 224,150
Manual Documentation EX222 Any other document (letterhead statements etc)	147,520	25.00 50.00	113.00 113.00	113.00 113.00	352.00% 126.00%	100,138 247,658 151,043 96,615
Replacement Certificate Replacement Certificate	147,520	150.00	301.00	301.00	100.67%	98,798 246,318 246,318
<b>Total</b>	<b>1,893,044</b>					<b>96,783</b>
<b>APPROVED ARRANGEMENTS</b>	<b>15,140</b>					<b>124,860</b>
FFS Approved Arrangement		30.00		30.00	0.00%	140,000
<b>Grand Total</b>	<b>1,908,184</b>					<b>221,643</b>
						<b>2,129,827</b>