

**Consultation document submission template**

**A review of cost recovery for selected services provided by the Ministry for Primary Industries**

We would like your feedback on the proposals in the consultation document: *A review of cost recovery for selected services provided by the Ministry for Primary Industries.*

Please feel free to use this template to prepare your submission (for one or more proposal). Once complete, please either email to [costrecovery@mpi.govt.nz](mailto:costrecovery@mpi.govt.nz), or mail to:

*Consultation: Cost Recovery Proposals targeting 1 July 2018*

*Cost Recovery Directorate*

*Ministry for Primary Industries*

*PO Box 2526*

*Wellington 6140*

Written submissions on the proposals close at 5pm on Wednesday 21 March 2018. Late submissions will not be accepted without prior written agreement from MPI.

**Official Information Act**

Please note that your submission is official information and may be the subject of requests for information under the Official Information Act 1982 (OIA). The OIA specifies that information is to be made available to requesters unless there are sufficient grounds for withholding it, as set out in the OIA.

Submitters may wish to indicate grounds for withholding specific information contained in their submission, such as the information is commercially sensitive or they wish personal information to be withheld. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

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| **Contact details** | |
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| **Name:** |  |
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| **Title:** |  |
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| **Postal address:** |  |
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| **Phone number:** |  |
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| **Email address:** |  |
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| **Are you submitting:** | | | | |
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| **- as an individual?** | | | **Yes**  **No** | |
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| **In which region are you located?** | Northland | Auckland | | Waikato |
| Bay of Plenty | Gisborne | | Hawke’s Bay |
| Taranaki | Manawatu-Wanganui | | Wellington |
| Marlborough | Tasman-Nelson | | West Coast |
| Canterbury | Otago | | Southland |
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| **- as a business?** | | | **Yes**  **No** | |
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| **What is the name of your business?** |  | | | |
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| **How many people work in your business (full time/ part time)?**  **(including owner-operators)** | 0 - 5 | 6 - 9 | | 10 -19 |
| 20 - 49 | 50 - 99 | | 100+ |
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| **In which region(s) do you operate?** | Northland | Auckland | | Waikato |
| Bay of Plenty | Gisborne | | Hawke’s Bay |
| Taranaki | Manawatu-Wanganui | | Wellington |
| Marlborough | Tasman-Nelson | | West Coast |
| Canterbury | Otago | | Southland |
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| **- on behalf of an organisation?** | | **Yes**  **No** |
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| **What is the name of your organisation?** |  | |
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| **How many members do you represent?** |  | |
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| **Additional details** | | | | |
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| **What industry are you (or your members) primarily involved in?** | Agriculture | | Aquaculture | |
| Fishing | | Seafood Processing | |
| Meat & Meat Product Manufacturing | | Dairy Product Manufacturing | |
| Other Food Manufacturing | | Other (non-food) Manufacturing | |
| Food Product wholesaling and retailing | | Food & Beverage Services  (e.g. cafes & restaurants) | |
| Transport, warehousing & related services | | | |
| Other: |  | |  |
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**Questions for submitters**

**Proposal 1: Changes to the Biosecurity System Entry Levy**

Proposal: increase the maximum cap for the levy, described in the Levy Order, from $18 to $25 and increase the BSEL rate to fully recover costs, including JBMS.

1. What impact will increasing the maximum cap for the levy and the BSEL rate have on you or your business?

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| Significant negative impact | Negative impact | No impact | Positive impact | Significant positive impact | Don’t know |

1. Please describe any impact and quantify this if possible.

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1. Are there any other issues associated with increasing the maximum cap for the levy and the BSEL rate that you think MPI should be aware of?

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1. Are there any other issues with the way the levy is operating generally that you think MPI should be aware of?

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**PROPOSAL 2:** **Extend the Border Clearance Levy period**

Proposal: amend the levy order to change the levy period from 12 months to *up to* 36 months to provide greater flexibility to manage the financial performance of the memorandum account over a longer period of time.

1. What is your preference for the Border Clearance levy period?

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| 12-month levy period  (status quo) | Up to 36-month levy period | No preference |

1. Please describe the reasons for your preference.

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1. What impact will extending the levy period from 12 months to *up to* 36 months have on you or your business?

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| Significant negative impact | Negative impact | No impact | Positive impact | Significant positive impact | Don’t know |

1. Please describe any impact.

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1. Are there any other issues associated with the extension of the levy period that you think MPI should be aware of?

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**Proposal 3: Align biosecurity inspection rates for all jurisdictions**

Proposal: align MPI border inspection rates for imports of live animals and animal products or material for all jurisdictions to ensure equitable treatment between all countries that export to New Zealand.

1. What impact will aligning the inspection rates for all jurisdictions have on you or your business?

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| Significant negative impact | Negative impact | No impact | Positive impact | Significant positive impact | Don’t know |

1. Please describe any impact and quantify this if possible.

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1. Are there any other issues associated with aligning inspection rates for all jurisdictions that you think MPI should be aware of?

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**Proposal 4: Update Animal Product Act levies for red meat, dairy, and fish processors**

Proposal: update levies for red meat, dairy products and fish processing, to recover current costs relating to domestic and export standards.

1. What impact will updating the levies have on you or your business?

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| Significant negative impact | Negative impact | No impact | Positive impact | Significant positive impact | Don’t know |

1. Please describe any impact and quantify this if possible.

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1. Would you prefer updating the levies from 1 July 2018, 1 July 2019, 1 January 2019, or splitting the updating (50% on 1 July 2018 and 50% on 1 July 2019)? Please rank the options from 1 to 4 with 1 being most preferred and 4 being least preferred.

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| Updating on  1 July 2018 | | | Updating on  1 July 2019 | | | | Updating on  1 January 2019 | | | Splitting the update between 2018 and 2019 | | |

1. What are the reasons for your views? Please describe any impact and quantify this if possible.

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1. Do you agree with the proposal to consolidate levies for deer, horses, and ostriches and emus, in a *Deer and other large species* levy category?

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| Agree | Disagree | No preference |

1. What are the reasons for your views?

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1. Are there any other issues associated with the various options of updating levy rates that you would like us to be aware of?

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1. Are there any other issues with the way the levies are operating generally that you think MPI should be aware of?

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**Proposal 5: New charges under the Food Act**

Proposal: introduce new charges relating to industry-developed templates for food control plans, and other approvals services, to ensure consistent and equitable recovery of costs of services under the Food Act.

1. Do you agree that MPI should charge for approving templates for food control plans (FCPs) that are developed by third parties (e.g. industry organisations) under s40?

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| Agree | Disagree | No preference |

1. What are the reasons for your views?

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1. What impact will the proposed new charges for approvals, renewals and amendments of food control plans developed from s39/40 templates have on you or your business?

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| Significant negative impact | Negative impact | No impact | Positive impact | Significant positive impact | Don’t know |

1. Please describe any impact and quantify this if possible.

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1. What impact will any of the other proposed new charges for approval-related services\* have on you or your business?

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| Significant negative impact | Negative impact | No impact | Positive impact | Significant positive impact | Don’t know |

(\* relating to laboratories, recognised agencies or persons, custom food control plans and approvals under s291 – see Table 15.)

1. Please describe any impact and quantify this if possible.

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1. Are there any other issues associated with introducing these charges that you think MPI should be aware of?

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1. Are there any other issues with the way fees charged by MPI under the Food Act are operating generally that you think MPI should be aware of?

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**Proposal 6: Update rates for circuit verifications**

Proposal: raise ordinary-time circuit verification rates from $165.00 per hour (including the basic charge) to $204.56 per hour, to address ongoing under-recovery of these costs (overtime and penal rates to be adjusted accordingly).

1. What impact will the proposed increase in charges for circuit verifications have on you or your business?

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| Significant negative impact | Negative impact | No impact | Positive impact | Significant positive impact | Don’t know |

1. Please describe any impact and quantify this if possible.

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1. What scope do you have to organise alternative ways of working to minimise the impact of the increased charges?

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1. Are there any other issues associated with the proposed verification charges that you think MPI should be aware of?

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1. Are there any other issues with the way verification charges are operating generally that you think MPI should be aware of?

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**Proposal 7: Introduce a targeted rate for storage premises and fish processors**

Proposal: add an additional $23.60 to the basic charge component of circuit verification rates for coolstores and other storage premises, and processors of fish, for two years only, to recover an historic non-recovery of this charge (resulting in the hourly rate rising from $165.00 to $228.16 per hour).

1. What impact will the proposed targeted rate have on you or your business?

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| Significant negative impact | Negative impact | No impact | Positive impact | Significant positive impact | Don’t know |

1. Please describe any impact and quantify this if possible.

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1. Are there any other issues associated with the proposed targeted rate that you think MPI should be aware of?

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