



Australian Government

Department of Agriculture, Fisheries and Forestry

# APEC Export Certification Workshop 2012

Experience, Knowledge  
and Confidence



**Greg Read**

1 May, 2012

---

**What Impact Should Experience, Knowledge, Confidence have with a trading partner when determining certification requirements**

**What do we mean by Experience, Knowledge and Confidence?**

**Align to performance characteristics which in this case relate to an exporting countries export inspection and certification systems.**

**We as regulators need to consider two elements carefully when we are determining certification requirements and imposing these obligations on exporting countries**

**1 - Firstly the Standard required by the importing country to ensure the protection of its consumers, animal and plant life in meetings is Appropriate Level of Protection. Effectively this should already be established within the importing countries national system. This standard is also in many cases combined with "other requirements" i.e. labelling.**

**2 - The second element is how as an importing country do we assure ourselves effectively and efficiently that these requirements are being adhered to by the exporting country?**

**Examples would include a long history in the trade of food products between an importing and exporting country**

- **in country audits**
- **border inspections**
- **monitoring of imported product in commerce**
- **review of 3rd party audits either commercial or official**



**International guidance could be lacking as to how to implement the concept of Experience, Knowledge and Confidence particularly with regard to how its application by an importing country is objectively applied and transparently communicated to the exporting country**

**Such guidance might assist an importing country weigh up performance risk *visa viz* the level of assurance required.**

**An area of concern for developing economies particularly when feeling disadvantaged by decisions of importing countries.**

## Such guidance might address the following

- where there is low risk to ALOP from imported product then assurance required will also be low with limited consideration of Experience, Knowledge and Confidence.
- where there is a risk to ALOP - and the corresponding appropriate measures determined through an appropriate risk assessment process (hopefully more outcomes expressed than prescriptive) - it then brings us to the point of assurance.
- In this context Experience, Knowledge and Confidence will be important in determining how the importing country has the appropriate levels of confidence that its expressed import standards are being met by the exporting country.
- Can range from detailed certificates, prescriptive in country systems, high levels of border inspections, high level of in country reviews.....to bilateral agreements i.e. mutual recognition arrangements with no certification requirements.

**Internationally we still overcomplicate the establishment of importing arrangements by not effectively separating the standard required from prescriptive measures where we have embed within these prescriptive measures holistic performance characteristics ie one prescriptive standard globally set to the level of the poorest export performer.**

**As APEC economies and regulators in these economies we would have more effective and efficient movement of international product more consistently meeting the ALOPs we prescribe by expressing our requirements more in terms of outcomes based standards and meeting our regulatory obligations regarding assurance confidence through the application of regulatory tools (certificates, audits, border testing, systems recognition of the exporting country etc) that are tailored based performance characteristics that are informed through Experience, Knowledge and Confidence**

## **Use of Experience, Knowledge and Confidence in CCFICS texts**

**CAC/GL 47/2003 GUIDELINES FOR FOOD IMPORT CONTROL SYSTEMS** – *Annex (2006) Principles and Guidelines for Imported Food based on Risk*

**CAC/GL 26-1997 – Guidelines For The Design, Operation, Assessment And Accreditation Of Food Import And Export Inspection And Certification Systems** - *Annex (2010) Principles and Guidelines for the Conduct of Assessments of Foreign Official Inspection and Certification Systems*

**CAC/GL53-2003 (revised 2008) GUIDELINES ON THE JUDGEMENT OF EQUIVALENCE OF SANITARY MEASURES ASSOCIATED WITH FOOD INSPECTION AND CERTIFICATION SYSTEMS** – *Annex (2008) Additional Guidance to Assist Exporting and Importing Countries in Undertaking and Equivalence Determination*