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# **Export assurance reform for non-prescribed goods**

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COUNCIL

## PREFACE

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, beverage and grocery manufacturing sector.

With an annual turnover in the 2022-23 financial year of \$162 billion, Australia's food and grocery manufacturing sector makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity. Each business in the sector has contributed towards an industry-wide \$4.2 billion capital investment in 2022-23.

Food, beverage and grocery manufacturing together forms Australia's largest manufacturing sector, representing over 32% of total manufacturing turnover in Australia. The industry makes a large contribution to rural and regional Australia economies, with almost 40 per cent of its 281,000 employees being in rural and regional Australia.

It is essential to the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

The industry has a clear view, outlined in *Sustaining Australia: Food and Grocery Manufacturing 2030*, of its role in the expansion of domestic manufacturing, jobs growth, higher exports and enhancing the sovereign capability of the entire sector.

*This submission has been prepared by the AFGC and reflects the collective views of the membership.*

## OVERVIEW

AFGC recognises DAFF's high-level intent to modernise export assurance arrangements for non-prescribed goods and to maintain confidence in Australia's export system and market access settings. However, industry is not yet in a position to assess the full impact or net benefit of the proposed framework, as key elements (including scope application, process design, data requirements and transitional arrangements) require further detail. DAFF have also indicated cost recovery modelling is underway and they plan to consult on the nature and timing of proposed fees and charges later in 2026. Consistent with this, AFGC members have indicated they will need to undertake whole-of-business analysis to understand resourcing, systems and administrative implications and to provide comprehensive, evidence-based feedback.

This submission represents AFGC members across food, beverage and grocery manufacturing who export non-prescribed goods, including businesses with mixed export portfolios spanning multiple commodity categories and regulatory regimes. The submission focuses on implementation feasibility, regulatory certainty (including scope/definitions and treatment of mixed portfolios), systems integration to avoid duplication, and communication and change management to support compliance.

Members have also highlighted the difficulty of planning for transition against the indicative timing of proposed changes, particularly in the current operating environment. Exporters will require adequate lead time, clear guidance and a sequenced transition pathway to avoid unintended impacts.

## GENERAL COMMENTS

Industry members are operating in an environment of significant operational pressure, costs and heightened supply chain uncertainty. Recent disruptions linked to the ongoing Middle East conflict are placing additional strain on industry supply chains and increasing compliance considerations for manufacturers. In this context, introducing new regulatory steps and related system/process changes will require careful sequencing, adequate lead time, and practical guidance to avoid unintended impacts on trade continuity.

Members have noted that the proposed implementation pathway and indicative timeframes are challenging in the current operating environment. DAFF materials indicate reforms are expected to commence in early 2027, with proposed export permits for all 'prescribed general products' to go live from around April 2027, and a phased introduction of licensing requirements through to 2029. While AFGC recognises the intent to phase implementation, members emphasise that planning for system integration, resourcing, and exporter readiness will need to start well in advance, particularly for businesses in earlier tranches and for those with mixed export portfolios and complex supply chains.

AFGC members also consider that additional detail is needed to enable comprehensive, evidence-based feedback. Many businesses will need to undertake whole-of-business consultation across export operations, compliance, supply chain, finance, procurement and IT teams, and to complete internal business impact assessments to understand administrative burden, systems changes, and resourcing implications. The current level of detail in the consultation materials limits the ability to fully quantify impacts and test proposed processes against real operational models.

Accordingly, AFGC encourages DAFF to provide further information and to clearly articulate further formal opportunities for industry consultation prior to finalising the framework, as additional details and supporting material become available. Central to this is also understanding the costs to affected businesses through proposed fees and charges. This would support more informed and complete industry feedback. Notwithstanding these constraints, AFGC has outlined below the key expected high-level impacts and the areas where further information and consideration will be critical to support practical implementation and compliance.

## ISSUES

### PRACTICAL IMPLEMENTATION AND OPERATIONAL READINESS

#### Operational impacts

DAFF's consultation materials propose new requirements for exporters of general products, including:

- an export licence requirement, and
- an export permit for each consignment, with government certificates continuing where applicable.

AFGC members emphasise that introducing an additional regulatory step per shipment (permit prior to export) can have significant operational implications, including:

- **Administrative uplift and resourcing:** increased staff time to prepare applications, manage exceptions/queries, and ensure documentary completeness across high-volume export operations.
- **Process and lead-time impacts:** permit before export workflows can affect production scheduling, warehouse release, freight cut-offs, and shipment handover arrangements.
- **System changes and integration costs:** exporters will likely need to update internal systems, processes, and compliance controls to capture new data fields and maintain audit records.
- **Scale and implementation risk:** Members are particularly concerned about the scale and concentration of change created by introducing a per-consignment permit requirement across the general products cohort. If the requirement for export permits is introduced across all prescribed general goods at one, this will create a significant spike in permit volumes, driving system congestion, increased exceptions handling, and delays at critical points in export workflows (including cut-off times and shipment release). A staged transition approach, supported by early systems testing, clear service standards, and contingency arrangements will be important to reduce implementation risk and protect trade continuity.

AFGC notes DAFF's stated intent to build licence applications into the Export Service and that legislation may allow up to 120 days to consider a complete export licence application. Even where DAFF aims to process applications faster, members highlight the need for:

- early visibility of final requirements, data elements, and workflow steps
- a well-resourced onboarding period (including testing and contingency arrangements) so exporters can maintain trade continuity

- practical transitional guidance (including worked examples) that reflects real export operating models.

**AFGC recommends** DAFF publish (well ahead of commencement):

- an “exporter readiness” package (plain-English) mapping end-to-end steps for common export scenarios
- a transition plan that includes systems testing, “grace period” approaches for early-stage issues, and service standards for query resolution
- guidance targeted at both exporters and intermediaries (e.g. brokers/freight forwarders), recognising varied operating models.

AFGC also notes the timing for the licensing requirement implementation is commencing after the permit requirements. DAFF is encouraged to ensure implementation sequencing and system design to avoid re-work and disruption to already-live permit workflows when licence requirements commence.

### Systems integration and data duplication

AFGC strongly supports an implementation approach that leverages existing systems and data wherever possible, minimising the need for exporters to enter the same information multiple times across different government platforms.

DAFF’s consultation materials indicate an intention to streamline licensing via the Export Service.

**AFGC recommends** DAFF also prioritise:

- system linkages that reduce duplication between export permits/certificates workflows and existing export data sources used by exporters and intermediaries
- re-use of existing exporter information (business structure, key personnel) once provided for licensing, rather than repeated entry across transactions.

For exporters, the operational objective should be a “enter once, use many times” model, supported by:

- consistent data standards
- pre-populated fields from validated exporter profiles
- clear API or upload options for higher-volume exporters to reduce manual re-keying.

## REGULATORY CERTAINTY

### Clarity on scope, definitions and classification approach

DAFF’s consultation materials indicate that seven groups of NPGs would be defined in legislation as general products.

For members with diverse portfolios, unambiguous definitions and consistent classification approaches are essential to:

- determine whether a given product is in scope or out of scope
- assess impacts across mixed export portfolios, including products that sit near general product category boundaries
- provide meaningful, evidence-based feedback on implementation impacts, costs, and timing.

Where definitions are unclear or inconsistently applied, members foresee risks including:

- inconsistent regulatory expectations across commodities, markets, and operational contexts
- increased compliance costs (including repeated re-work of classifications and documentation)
- shipment delays due to uncertainty about whether a permit, licence, or certificate pathway applies
- reduced confidence in the regulatory model and potential unintended impacts on market access outcomes.

### Scope of complex / grey-area products - scope and classification

AFGC members export products that do not always fit neatly within a single category. An example of this includes “therapeutic-adjacent” goods that may not be within the reform proposal where they fall under other regulatory frameworks (e.g., therapeutic goods) but may still be exported by some members as “other foods” depending on product presentation, end use, and importing-country requirements. DAFF’s materials indicate goods regulated under other frameworks (including therapeutic goods) are proposed to be excluded from the general products framework.

Members seek clearer guidance on how products will be treated under the reform where:

- tariff classification (e.g., vitamin/provitamin-related codes) does not align with how products are regulated or accepted in the importing market, and/or
- product end use (including whether goods are for human consumption) changes the expected assurance pathway.

### **AFGC recommends DAFF:**

- publish a clear “scope test” (decision-tree) that exporters can apply at product and consignment level
- provide an authoritative list of included and excluded examples for each general product category (with rationale)
- ensure consistent treatment across markets while recognising that importing-country requirements drive assurance needs for many NPG exporters
- criteria DAFF will use to determine the appropriate pathway where products fall outside clear categories
- worked examples showing how the framework will apply to products at the margins of categories
- an approach for consistent decision-making (including escalation/decision review pathways), to avoid inconsistent treatment across exporters and markets.

AFGC notes that clear guidance in this area will be critical to ensuring exporters can confidently determine scope, comply with requirements, and avoid shipment disruption.

## Treatment of mixed portfolios and regulatory interactions

Many AFGC members manage export portfolios that include:

- products captured under the proposed general products framework (including food and beverages), and
- products regulated by already existing prescribed goods (such as dairy, seafood, meat etc.)
- products regulated under other frameworks (e.g., where DAFF has indicated exports regulated by other agencies i.e. therapeutic goods and are proposed to be excluded from the general products framework).

Members need clarity on how the reform will operate in practice where exporters:

- export multiple product types under different regulatory regimes
- ship mixed consignments (or consolidated freight) with varying documentary pathways
- rely on different parties for export execution (internal export teams vs third-party intermediaries).

AFGC highlights the importance of alignment to avoid duplication or conflicting obligations across:

- DAFF export requirements (licences, permits, certificates)
- importing-country requirements (which can vary by destination and product presentation)
- Customs export declaration processes (including broker-managed and self-managed lodgement models)
- other regulatory frameworks where relevant.

**AFGC recommends** DAFF clearly articulate:

- how general products requirements interface with existing export assurance or exclusion pathways for goods regulated elsewhere
- how exporters should manage mixed portfolios without duplicative data entry, duplicative audits, or inconsistent accountability expectations.

## COMMUNICATION AND CHANGE MANAGEMENT

### Communication reach

AFGC notes that DAFF may not have full visibility of exporter-to-market relationships or the operational arrangements used to lodge export documentation. DAFF's consultation materials also acknowledge exporter accountability is tied to the entity named on export documentation (e.g., permits/certificates), and that freight forwarders/brokers may be the exporter where documentation is in their name.

This has practical implications for communication and change management. **AFGC recommends** DAFF adopt a multi-channel approach that recognises:

- **Customs brokers / freight forwarders:** where used, these intermediaries can be effective dissemination points for system changes, documentary requirements, and timing impacts (while noting they are not always the exporter).
- **Self-lodging exporters:** some members manage export declarations and related processes internally; targeted guidance is needed for in-house export/compliance teams.
- **Proactive, targeted communications:** reliance on passive guidance alone risks uneven uptake, particularly for smaller exporters or infrequent exporters.

**AFGC recommends DAFF:**

- coordinates communications and implementation planning with Customs-related stakeholders (where appropriate) to ensure exporters receive consistent messages through the channels they actually use
- provides clear, role-specific guidance (exporter vs agent vs broker) aligned to the exporter accountability approach described in the consultation materials.

### Communicating the rationale and expected benefits

Members have indicated that the policy rationale and intended benefits of the proposed framework are not yet well understood at an industry level. Strengthening the communication of the “why” is important to support informed engagement, increase confidence in the proposed approach, and enable practical readiness planning across different exporter operating models.

To support informed engagement and practical readiness, DAFF is encouraged to strengthen communications that clearly articulate:

- the high-level purpose of the reform and the outcomes DAFF is seeking to achieve
- the expected benefits for exporters and industry (including how the model will assist exporters to meet importing-country requirements and support trade continuity)
- how the proposed arrangements will be implemented in a way that is proportionate, avoids unnecessary duplication, and supports diverse exporter operating models.

**AFGC recommends** that DAFF complement technical materials with timely plain-English summaries, sector-relevant examples, and fit-for-purpose guidance products (e.g., decision tools, worked examples and visual explainers) to ensure exporters can readily understand obligations and benefits across mixed portfolios.

## CONCLUSION

AFGC recognises DAFF’s objective to maintain confidence in Australia’s export systems and safeguard market access for exporters of non-prescribed goods. However, industry is not yet able to fully assess impacts or benefits of the proposed general products framework due to the current level of detail available on scope application, process design, and transitional arrangements. Further implementation detail will assist exporters to undertake whole-of-business impact assessment and readiness planning, including resourcing and systems changes.

AFGC's high-level feedback and priority implementation themes are:

1. prioritise practical implementation guidance that reflects real exporter workflows and supports transition to any new permit/licensing steps;
2. ensure clear, unambiguous definitions and classifications so exporters can determine scope consistently and provide meaningful feedback;
3. provide explicit clarity on mixed portfolios and regulatory interactions, avoiding duplication or conflicting obligations;
4. adopt proactive, targeted communications that reflect exporter operating models, including where brokers/freight forwarders are involved and where exporters self-lodge documentation, including clearer articulation of the "why" and expected benefits for industry; and
5. design for systems integration and reduced data duplication, leveraging existing platforms and exporter profile information wherever possible.

The AFGC also understands the department is undertaking cost recovery modelling and plan to consult on the nature and timing of proposed fees and charges later in 2026. This information is critical to fully understand the impacts of these reforms across the 'prescribed general product' sectors.

AFGC looks forward to continued engagement with DAFF to support workable implementation settings that strengthen assurance outcomes while maintaining efficient export operations for Australian food, beverage and grocery manufacturers.



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CELEBRATING  
**30**  
YEARS  
1995-2025

# STATE OF THE INDUSTRY

## 2023-24



The figures on this page exclude the fresh food sector and are based on 2023-24 ABS data.

1: This is total number of employees, head count basis and does not include seasonal employees.

2: Gross fixed capital formation for food, beverage and tobacco manufacturing subsector is taken as indicator of capital investment.