



New Zealand Food Safety

Haumaru Kai Aotearoa

Recognising Variability in Charging for Animal Products and Wine Approvals

Updating charging practices for selected services

New Zealand Food Safety Discussion Paper No: 2019/08

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Requests for further copies should be directed to:

Publications Logistics Officer
Ministry for Primary Industries
PO Box 2526
WELLINGTON 6140

Email: brand@mpi.govt.nz

Telephone: 0800 00 83 33

Facsimile: 04-894 0300

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CONTENTS

- 1 Overview 1**
 - Submissions 1
 - Official Information Act 1982 2
 - Goods and Services Tax (GST) 2
 - Next steps 2

- 2 Cost recovery at MPI 2**

- 3 The food system 2**
 - MPI's services support the food system 2
 - MPI recovers a range of costs for providing services in the food system 3

- 4 Proposal: Recognise variability in the time taken for animal products and wine approvals 3**
 - What is MPI proposing to change? 3
 - Who will this proposal affect? 5
 - What options are there for setting the threshold? 5
 - What impact will this have on businesses that pay these fees and on MPI? 5
 - How and when will the changes take place? 7

- 5 Questions 7**

- 6 Appendix 1: MPI's Approach to cost recovery 9**
 - Guiding principles 9
 - Cost recovery guidance from the Treasury, Controller and Auditor-General 9
 - Ensuring cost recovery remains appropriate 9

- 7 Appendix 2: Affected Services 11**

1 OVERVIEW

Cost recovery plays an important role in making sure that the Ministry for Primary Industries (MPI) has sufficient funding to ensure the food New Zealand produces is suitable and safe for consumption and export. Cost recovery funds a wide range of services in the food system.¹ These services include verifying that businesses across the whole supply chain are following their food safety measures, providing official assurances that New Zealand's exporters meet overseas market access requirements, and undertaking research, audits and food testing.

A key principle for MPI's cost recovery is ensuring it is set at the right level; in other words that the right businesses pay the right amount for the right services.

In 2019, MPI replaced the variable charges of 51 food system services with fixed fees. The fixed fees were set to reflect the standard amount of time (either one hour or thirty minutes) it takes MPI to perform these services.

MPI subsequently identified that for 15 of these services the fixed fee does not always reflect the amount of time taken to perform the service. This means that in some instances businesses do not pay the full cost of the service they receive.

To correct this MPI is consulting on updating fees for these services to better reflect the typical cost of providing them. The consultation also proposes options to allow for higher charges in the small proportion that take significantly longer than the standard amount of time to process.

The proposed changes are for the following services:

- Registration of a Risk Management Programme (RMP)
- Registration of an amendment to an RMP
- Minor updates to an RMP
- Recognition of a person, agency or laboratory (Animal Products and Wine)
- Approval or recognition of a non-dairy or dairy maintenance compound
- Registration of a Wine Standards Management Plan (WSMP)
- Significant amendments to a WSMP.

SUBMISSIONS

We welcome submissions on the proposals contained in this document. All submissions must be received no later than 5pm on 16 December 2019.

You can return your submission by:

Email: costrecovery@mpi.govt.nz

Mail: Cost Recovery Directorate
Ministry for Primary Industries
PO Box 2526
Wellington 6140

We encourage you to make your submission using the template available on the MPI website at: www.mpi.govt.nz/consultations. Please include the following information:

- the title of this discussion document
- your name and title
- your organisation's name (if you are submitting on behalf of an organisation) and whether your submission represents the whole organisation or a section of it
- your contact details (such as phone number, address and/or email).

Providing a submission is optional and not a legal requirement.

¹ The food system includes the Food Act 2014, Animal Products Act 1999, Agricultural Compounds and Veterinary Medicines Act 1997 and Wine Act 2003.

OFFICIAL INFORMATION ACT 1982

Submissions are 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 is a good reason for withholding it.

Submitters may wish to indicate grounds for withholding specific information contained in their submissions, such as where they consider information is commercially sensitive or they wish personal information be withheld. We will consider these requests in accordance with the provisions of the OIA. Should we decide to withhold information on request, any such decision is reviewable by the Ombudsman.

GOODS AND SERVICES TAX (GST)

This document describes fees and charges on a GST-exclusive basis. We have taken this approach to ensure consistency and comparability within and between cost recovery regimes. This approach also means that regulated charges will still be valid in the event of any GST variations.

NEXT STEPS

All submissions received within the timeframe will be considered and used to inform final policy decisions in relation to this proposal. We aim to implement policy decisions from 1 July 2020.

We will undertake stakeholder engagement during the consultation period. If you would like to meet with us to discuss the contents of this document, or other matters related to cost recovery, please contact us by emailing costrecovery@mpi.govt.nz.

2 COST RECOVERY AT MPI

Cost recovery plays a significant role in ensuring that services critical to protecting New Zealand's food safety, biodiversity and the \$46.4 billion (2018/19) in annual primary industry exports are sufficiently funded. In 2018/19 approximately 30% (\$220 million) of MPI's departmental funding was from cost recovery through approximately 300 fees and levies authorised under ten Acts.

Given the scope and significance of cost recovery, we have an ongoing work programme to ensure the systems and processes that support it remain fit for purpose. As part of this cost recovery, settings are reviewed annually to ensure they are fair and effective.

The scope and diversity of services MPI provides across different sectors means that it is not practical to adopt a 'one-size-fits-all' approach to cost recovery settings. Instead, we take a principles-based approach, as described in MPI's cost recovery policy guidance.² Further information about MPI's approach to cost recovery is set out in Appendix 1.

3 THE FOOD SYSTEM

MPI'S SERVICES SUPPORT THE FOOD SYSTEM

New Zealand's food system is world leading and is based on international best practice science and risk assessment. In general terms the current legislative framework makes businesses responsible for the safety and suitability of their products, with MPI responsible for ensuring that this happens.

This system is critical for protecting and supporting the health of New Zealanders and to support New Zealand's exports. With around 80% of food produced in New Zealand being exported, there are both domestic and international consumers who expect food products to be safe to consume.

² <https://www.mpi.govt.nz/dmsdocument/30855-ministry-for-primary-industries-cost-recovery-policy-guidance>.

MPI RECOVERS A RANGE OF COSTS FOR PROVIDING SERVICES IN THE FOOD SYSTEM

The Animal Products Act 1999 and Wine Act 2003 (APA and Wine Act respectively) requires MPI to take all reasonable steps to recover the costs of administering the Acts that are not Crown funded. The Acts also require cost recovery to be aligned with the principles of equity, efficiency, justifiability and transparency. Both Acts provide flexibility in the types of fees, charges and levies that can be used.

Under the APA and Wine Act we currently recover the costs of a range of services through direct fees for approvals (such as listings, recognitions, registrations and exemptions). These services regulate how businesses operate in relevant markets (including approval of their premises, systems and supply chains) to minimise and manage risks to human or animal health arising from the production and processing of animal material and products. These fees were last updated on 1 July 2019.

4 PROPOSAL: RECOGNISE VARIABILITY IN THE TIME TAKEN FOR ANIMAL PRODUCTS AND WINE APPROVALS

What is the problem?

MPI has identified 15 fees (Table 1, below) where the fixed fee does not always accurately reflect the length of time it typically takes to provide the service. This means some customers are not paying the full cost of the service they receive, which is inequitable.

WHAT IS MPI PROPOSING TO CHANGE?

The services provided and base hourly rate of \$135 will remain the same. We only propose altering the fees set out in Table 1 to better reflect the typical time it takes to provide these services.

The objective of this proposal is to improve equity by ensuring charges accurately reflect service costs and incentivise efficient service delivery by MPI. MPI proposes:

- *Ensuring charges reflect costs:*
Changing fixed fees to match the typical amount of time it takes to provide the service, as set out in Table 1.
- *Incentivising efficiency:*
Introducing the ability to charge for any additional time taken by MPI to provide a service where it exceeds a regulated time threshold. MPI could only charge for additional time in specific circumstances.

Ensuring charges reflect costs

The first part of this proposal is to reset the fixed fee for the services specified in Table 1 to better reflect the typical time it takes to provide them.

For example, it typically takes MPI one hour and fifteen minutes to process a new application for a recognition and half an hour to renew a recognition. Under this proposal, the fixed fee for a new application would increase from \$135 (one hour at the base hourly rate) to \$168.75 (one hour and fifteen minutes) and decrease from \$135 to \$67.50 (half an hour) for a renewal. Where a service takes less than the regulated time, MPI has the ability to waive a portion of the fee.

Incentivising efficiency

The second part of this proposal is to enable higher rates of cost recovery in the rare instances where it takes significantly longer than normal to provide a service, while continuing to incentivise MPI's efficiency. It is proposed to charge a variable fee only when a time threshold above the normal level is reached. Where the processing time is more than normal but less than the threshold, only the fixed fee will be charged.

For example, it typically takes two hours to approve a new Risk Management Programme (RMP) application. If the time threshold is set at one hour above the time the fixed fee, and the application takes two-and-a-half hours to process the application, only \$270 would be charged (the fixed rate set at two hours). In contrast, if it took four hours to process, the applicant would be charged \$540 to process the application (four hours at the hourly rate).

The proposed changes affect services related to approvals, which can involve both technical and administrative work to approve. The services are provided at the request of the applicant, who benefits from being able to operate in the regulated industry.

The specific services covered in this consultation differ from the other approvals that were previously set as fixed fees, as they often take longer than the rate they were set at.³ The typical time taken to perform these services is shown in Table 1.

Table 1: Proposed changes to cost recovery provisions

Regulation reference	Application form code: service	Typical annual applications	Chargeable time under Regulations	Typical processing time per form (hours)	
		Total	Hours	New application	Renewal
Animal Products (Dairy Industry Fees, Charges, and Levies) Regulations 2015 Schedule 1, Part 1 (D)					
Animal Products (Fees, Charges, and Levies) Regulations 2007 Schedule 1, Part 1 (The Non-Dairy Regulations (ND))					
D Approval 2 ND Item 1	AP4: Application for registration of a Risk Management Programme (RMP)	130	1	3 Customised RMP 2 Template RMP	
D Approval 2 ND Item 1	AP5: Application for registration of an RMP under new operator	112	1	1	-
D Approval 2 ND Item 2	AP6: Application for registration of an amendment to an RMP	114	0.5	2.5 Customised RMP 1.5 Template RMP	
D Approval 5 ND Item 13 ND Item 14	AP7: Application for recognition of a person (APA)	89	1	1.25	0.5
D Approval 5 ND Item 13 ND Item 14	AP8: Application for recognition of an agency (APA)	-	1	1.25	0.5
D Approval 5 ND Item 13 ND Item 14	AP18: Application for recognition under the Recognised Laboratory Programme (RLP) as an animal products laboratory	11	1	1.25	0.5
D Approval 6 ND Item 3	AP50: Fee in relation to minor updates of an RMP	288	0.5	1 Technical 0.5 Non-Technical	
ND Item 44	AP65: Application for approval of maintenance compound (non-dairy)	836	0.5	1	0.5
D Maintenance Compounds	DPF15: Dairy maintenance compound approval or recognition	307	0.5	1	0.5
Wine Regulations 2006, Schedule 1, Part 1					
Item 3 Item 4	WA4: Application for registration of a Wine Standards Management Plan (WSMP)	10	1	2.5 Customised WSMP 1.5 Template WSMP	
Item 5	WA6: Application for registration of significant amendments to a WSMP	52	0.5	1	-
Item 9	WA7: Application for recognised person (Wine)	-	1	1.25	0.5
Item 9	WA8: Application for recognised agency (Wine)	-	1	1.25	0.5
Item 9	WL7: Application for recognised wine laboratory	-	1	1.25	0.5

Notes:

1. Some services, such as recognitions, last for multiple years, as such where there are low numbers of businesses, volumes can strongly vary.
2. For a more detailed explanation of the proposed changes, including specific regulation changes, see Appendix 2.
3. 'Application Code' refers to the code such as 'AP4' that each application form for an approval is identified by. Some Regulations may apply to multiple forms and some forms may be for multiple Regulations.
4. 'Form' refers to the document that a person or business fills out to apply for a service from MPI.

³ Of around 2,000 applications of these types per year, there are approximately six instances where processing time takes significantly longer than is standard.

WHO WILL THIS PROPOSAL AFFECT?

This proposal will affect applicants for some approvals (including renewals) under the APA and Wine Act. It will particularly affect businesses whose applications are more complex and take significantly longer to process than is typical. This is most likely to apply for new applications to register as a wine or animal product business or if a new premise or process is being added to a registration.

WHAT OPTIONS ARE THERE FOR SETTING THE THRESHOLD?

MPI is seeking feedback on where the regulated time threshold should be set. In setting the time threshold there is a trade-off between ensuring applicants pay the full cost of their applications (equity) and incentivising MPI to be efficient. In general, the lower the threshold is set, the more often MPI will be able to charge for additional hours.

For example, if the time threshold is set at two hours, applications taking two hours or more above the standard processing time would pay the full cost of the service. Applications taking less than two hours above the standard processing time would only pay the fixed fee and MPI would not be able to recover the additional cost of the service. This would incentivise MPI to complete the processing of applications within the set timeframe. Setting the time threshold at a lower level (such as half an hour) would be more equitable (as more customers would pay the full cost of services provided) but would provide less incentive for MPI to be efficient.

It is not possible to definitively estimate what the impact of different thresholds would be, as the volume of applications requiring significantly longer processing time is hard to predict. However, volumes are generally low and the overall impact is expected to be minimal, particularly given we are also proposing changes to fixed fees to better reflect the standard processing time.

Table 2: Summary of impacts for different threshold options

Option:	Amount of time potentially not charged	Potential unrecovered costs (maximum)
Status quo (only ever charge for one hour)	Any amount over the base rate	Variable – depends on processing time
Zero-hour threshold (fully variable)	None	None
Half-hour threshold	Up to half an hour	Up to \$67.50
One-hour threshold	Up to one hour	Up to \$135
Two-hour threshold	Up to two hours	Up to \$270

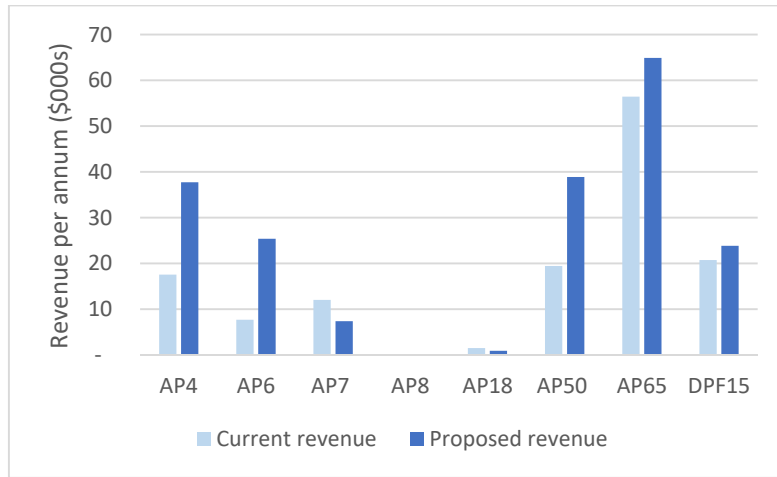
WHAT IMPACT WILL THIS HAVE ON BUSINESSES THAT PAY THESE FEES AND ON MPI?

The proposed changes are estimated to increase MPI's revenue by less than \$0.1 million per year. These services are forecast to cost approximately \$0.22 million in total in 2020/21.

On 1 July 2019 the base hourly rate for approval services was reduced to \$135. While the proposed changes represent an increase compared with current rates, these new fixed fees are more equitable as they better reflect the costs of providing the services. They are also lower than the amount a business would have paid for the same service before the 1 July 2019 changes.

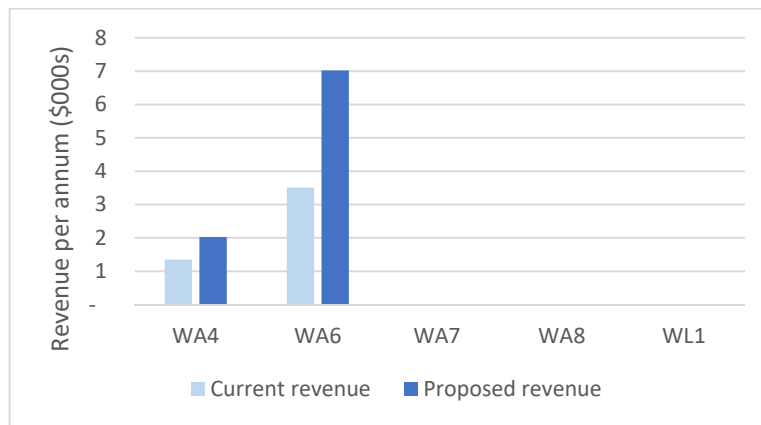
This proposal is not expected to have a material impact on industry or business-level profitability, drive behavioural change by those affected or have an influence on industry dynamics. The costs of providing these services have not increased.

Figure 1: Change in total revenue per APA Application (based on 2018/19 volumes)



Note: Some services, such as recognitions, last for multiple years. Many fall due at the same time, which means that volumes can vary significantly from year to year.

Figure 4: Change in total revenue per Wine Act Application (2018/2019 volumes)

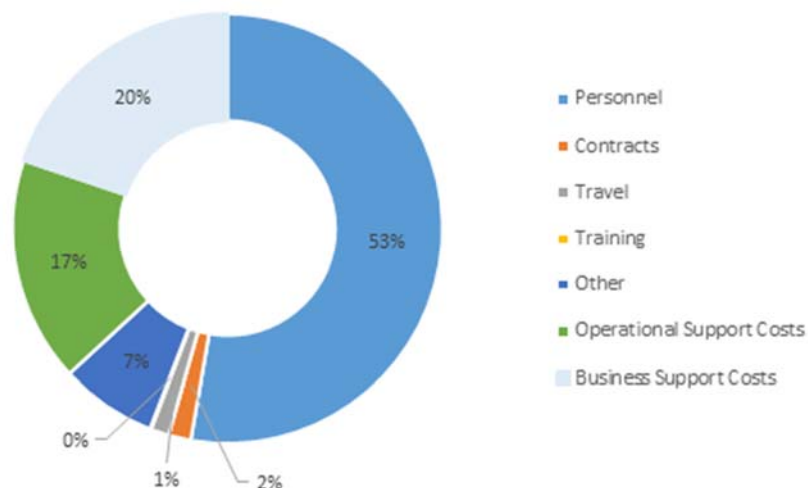


Note: Some services, such as recognitions, last for multiple years. Many fall due at the same time, which means that volumes can vary significantly from year to year.

What's driving MPI's costs?

The main cost drivers for approvals in the areas covered in this proposal are personnel and business support costs, as shown in the graph below.

Figure 5: Approvals and Related Services Cost Components



HOW AND WHEN WILL THE CHANGES TAKE PLACE?

Changes for the above proposals will be through amendments to the following regulations, with effect from 1 July 2020:

- Animal Products (Fees, Charges, and Levies) Regulations 2007
- Animal Products (Dairy Industry Fees, Charges, and Levies) Regulations 2015
- Wine Regulations 2006.

A table of the services and fees this proposal affects is set out in Appendix 2.

5 QUESTIONS

1. Do you agree with the proposal to update the rates charged for the services outlined in Appendix 2 to meet their actual costs?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Agree	Disagree	Other	No opinion

2. What are the reasons for your opinion? If 'other' which fees do you not support being updated?

3. What impact will the proposed changes in fixed fees have on you or your business?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Significant negative impact	Negative impact	No impact	Positive impact	Significant positive impact	Don't know

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

5. Do you agree with the proposal to introduce an ability for MPI to charge hourly rates for services currently charged at a fixed rate, in cases where the time to deliver the service exceeds a regulated threshold?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Agree	Disagree	No opinion

6. What are the reasons for your opinion?

7. After how many hours should businesses be billed for any additional time taken for MPI to process a form?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Status quo	Fully variable	Half an hour	1 Hour	Two hours	Other

8. What are the reasons for your opinion?

9. What impact will the proposed threshold have on you or your business?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Significant negative impact	Negative impact	No impact	Positive impact	Significant positive impact	Don't know

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

11. Are there any other issues with approval and related fees you think MPI should be aware of?

6 APPENDIX 1: MPI'S APPROACH TO COST RECOVERY

Cost recovery is an important part of MPI's funding arrangements. It involves charges (usually fees or levies) to recoup the costs of providing services to individuals, businesses or other entities. Cost recovery is only undertaken where there is a lawful authority provided for in legislation or in some cases on a contractual basis.

MPI recovers costs associated with activities and services that deliver outputs. Our charges do not generally seek to recover costs or reflect benefits associated with the wider outcomes a service may contribute to.

GUIDING PRINCIPLES

Four key principles guide our approach to cost recovery – equity, efficiency, justifiability and transparency. These four principles are the criteria that have been used to assess options in the proposals set out in this discussion document and are common features in most legislation that authorises us to recover costs. The principles, described below, are found in the four Acts within the food system:

- *Equity* – services should be funded from users that benefit from the service or users that create risks that the service is designed to manage ('risk exacerbators').
- *Efficiency* – costs should be charged to ensure that maximum benefits are delivered at minimum cost.
- *Justifiability* – charges should only recover the reasonable costs (including indirect costs) of providing the service.
- *Transparency* – costs should be identified and allocated to the service for the recovery period in which the service is provided.

COST RECOVERY GUIDANCE FROM THE TREASURY, CONTROLLER AND AUDITOR-GENERAL

When setting or reviewing charges, in addition to the four principles, we also apply the general guidance on cost recovery for public entities published by the Treasury and Controller and Auditor-General (CAG). That guidance requires consideration of:

- *Authority* – does the public entity have legal authority to charge a fee for the goods and services provided?
- *Effectiveness* – are resources allocated in a way that contributes to the outcomes being sought by the activity? Is the level of funding fit for purpose?
- *Simplicity* – is the cost recovery regime straightforward and understandable to relevant stakeholders?
- *Accountability* – public entities are accountable to Parliament and to the public. To be accountable, entities need to ensure that their processes for identifying costs and setting fees are transparent.
- *Consultation* – has the entity engaged in meaningful consultation with stakeholders and is there opportunity for stakeholders to contribute to the policy and design of the cost recovery activity?

Treasury's guidance encourages agencies to adopt an open-book approach throughout the different stages of the cost recovery process. This consultation document includes information about the costs of the proposal, thereby addressing Treasury's guidance to provide this information.

ENSURING COST RECOVERY REMAINS APPROPRIATE

Ongoing performance reporting

We recognise that performance reporting is a critical component of providing transparency to industry and other interested parties, as well as ensuring ongoing system efficiency. Together with Customs we have published the first two annual performance reports for the Border Clearance Levy.

To improve transparency we have worked with industry to create a framework for reporting on the performance of cost-recovered services for all sectors. We have published the first two reports based on the framework, for the Red Meat and Dairy sectors. Further reports covering cost recovery for other sectors will be released progressively over the coming year. We will continue to work closely with industry to ensure that the performance information produced in the reports is meaningful.

Ongoing monitoring and review

We monitor the financial performance of all of our cost recovered systems on an ongoing basis through the year. In line with best practice guidance, we generally review each cost recovery regime at least once every three years. This ensures that cost recovery regulatory settings remain appropriate. Reviews will consider both cost recovery policy settings and fee and levy rates.

Fees and levies may also be updated outside the review cycle if a material surplus or deficit accumulates in a memorandum account.⁴ However, we aim to set fees and levies at levels that ensure memorandum accounts trend towards zero over a three-year period.

⁴ Memorandum accounts record expenditure, revenue and the accumulated balance of surpluses and deficits from MPIs charges.

7 APPENDIX 2: AFFECTED SERVICES

Animal Products (Fees, Charges, and Levies) Regulations 2007					
Schedule 1 Part 1 Schedule of fees					
Service	Fee prior to 1 July 2019	Fee from 1 July 2019	Proposed fee from 1 July 2020	Place in Regulation	Form
				Schedule 1, Part 1	
Application under section 20 for registration of Risk Management Programme	\$155.00 per application	\$135 per application	\$270 for a Template RMP \$405 for a Customised RMP	Item 1	AP4 AP5
	Plus assessment charge on hourly basis after the first hour as specified in Part 2		Plus a variable charge after a threshold of X hours		
Application under section 25 for agreement to amendment of Risk Management Programme	\$77.50 per application	\$67.50 per application	\$202.50 for a Template RMP \$337.50 for a Customised RMP	Item 2	AP6
	Plus assessment charge on hourly basis after the first 30 minutes as specified in Part 2		Plus a variable charge after a threshold of X hours		
Application under section 107 for recognition	\$155.00 per application	\$135 per application	\$168.75 per new application	Item 13	AP7 AP8 AP18
	Plus assessment charge on hourly basis after the first hour as specified in Part 2		Plus a variable charge after a threshold of X hours		
Application under section 112D for renewal of recognition	\$155.00 per application	\$135 per application	\$67.50 per application	Item 14	AP7 AP8 AP18
	Plus assessment charge on hourly basis after the first hour as specified in Part 2		Plus a variable charge after a threshold of X hours		
Application under section 112E for substituted notice of recognition	\$77.50 per application	\$67.50 per application	\$67.50 per application	Item 16	AP7 AP8
	Plus assessment charge on hourly basis after the first 30 minutes as specified in Part 2		Plus a variable charge after a threshold of X hours		
Application under section 26 for agreement to minor amendments of Risk Management Programme	\$77.50 per application	\$135 per application	\$135 per application	Item 3	AP50
	Plus assessment charge on hourly basis after the first 30 minutes as specified in Part 2		Plus a variable charge after a threshold of X hours		
Application for approval of any maintenance compounds that is required to be undertaken under regulation 11(4) of the Animal Products Regulations 2000	\$77.50 per application	\$67.50 per application	\$135 per application	Item 44	AP65
	Plus assessment charge on hourly basis after the first 30 minutes as specified in Part 2		Plus a variable charge after a threshold of X hours		

Animal Products (Dairy Industry Fees, Charges, and Levies) Regulations 2015					
Schedule Part 1 Fixed fees, charges, and levies					
Service	Fee prior to 1 July 2019	Fee from 1 July 2019	Proposed fee from 1 July 2020	Place in Regulation	Form
				Schedule 1, Part 1	
Application for, evaluation of, and approval or variation of risk management programmes and quota compliance programmes	\$155 per application	\$135 per application	\$270 for a Template RMP \$405 for a Customised RMP \$337.50 for amendment to a Customised RMP \$202.50 for amendment to a Template RMP	<i>Approvals</i> Item 2	AP4 AP5 AP6
	Plus assessment charge on hourly basis after the first 30 minutes as specified in Part 2		Plus a variable charge after a threshold of X hours Additional hours can be waived		
Application for, evaluation of, and approval or variation of approval of laboratories under section 101	\$155 per application	\$135 per application	\$168.75 per new application \$67.50 per application for a renewal	<i>Approvals</i> Item 3	AP18
			Plus a variable charge after a threshold of X hours		
Application for, evaluation of and recognition, variation, or renewal of agency or person as recognised agency or person under Part 8 of the Act	\$155 per application	\$135 per application	\$168.75 per new application	<i>Approvals</i> Item 5	AP7 AP8
			Plus a variable charge after a threshold of X hours		
Application under section 26 for agreement to minor amendments of Risk Management Programme	\$77.50 per application	\$67.50 per application	\$67.50 per application for a renewal	<i>Approvals</i> Item 6	AP50
	Plus assessment charge on hourly basis after the first 30 minutes as specified in Part 2		Plus a variable charge after a threshold of X hours With a 30 minute waiver for when applications are not of a technical nature		
Application for approval of any maintenance compounds that is required to be undertaken under regulation 30(1) of the Animal Products (Dairy) Regulations 2005	\$77.50 per application	\$67.50 per application	\$135 per new application \$67.50 per application for a renewal	<i>Maintenance Compounds</i> Item 1	DPF15
	Plus assessment charge on hourly basis after the first 30 minutes as specified in Part 2		Plus a variable charge after a threshold of X hours		

Wine Regulations 2006					
Schedule 1 Part 1 Fees and charges					
Service	Fee prior to 1 July 2019	Fee from 1 July 2019	Proposed fee from 1 July 2020	Place in Regulation	Form
				Schedule 1, Part 1	
Application based solely on template approved by Director-General for registration of wine standards management plan in accordance with section 18 of the Act	\$155 per application	\$135 per application	\$202.50 for a Template WSMP	Item 3	WA4
	Plus assessment charge on hourly basis after the first hour, as specified in Part 2		Plus a variable charge after a threshold of X hours		
Application not based solely on template approved by Director-General for registration of wine standards management plan in accordance with section 18 of the Act	\$155 per application	\$135 per application	\$337.50 for a Customised WSMP	Item 4	WA4
	Plus assessment charge on hourly basis after the first hour, as specified in Part 2		Plus a variable charge after a threshold of X hours		
Application for registration of significant amendment to Wine Standards Management Plan under Section 22 of the Act	\$77.50 per application	\$67.50 per application	\$67.50 per application	Item 5	WA6
	Plus assessment charge on hourly basis after the first 30 minutes, as specified in Part 2		Plus a variable charge after a threshold of X hours		
Application for recognition of agency, person, or class of persons, under section 71, 73, or 75 of the Act	\$155 per application	\$135 per application	\$168.75 per new application \$67.50 per application for a renewal	Item 9	WA7 WA8 WL1
	Plus assessment charge on hourly basis after the first 30 minutes, as specified in Part 2		Plus a variable charge after a threshold of X hours		