

Australian Organic Limited (AOL)
2025/26 Federal Budget Submission

EXECUTIVE SUMMARY

The 2024/25 Federal Budget presents a critical opportunity for the Australian Government to invest in key areas that will enable the Australian organic industry to expand, enhance market access, and contribute to Australia's broader agricultural and sustainability goals building on the momentum generated by the introduction of the *National Organic Standard Bill 2024* and its subsequent inquiry; and the *Trading North* report, which outlines key recommendations for strengthening organic trade and regulation.

The Australian Organic industry is currently a \$2.8 billion industry employing approximately 22,000 FTEs in Australia, yet representing only 1% of the global \$220 billion export market, with the potential to double or even triple its share over time with the support of seed funding across three critical priority pillars:

- 1. **Domestic Regulation** Transition to a regulated domestic market to remove trade barriers, ensure a level playing field for domestic operators, increase consumer trust and move beyond being the final OECD country with domestic regulation.
 - Budget request: \$5,220,000 over four years
- 2. Market Access Acceleration Accelerate growth for Australia's organic export market by accelerating equivalency discussions, enhancing resources and funding targeted trade initiatives to assist organic operators to export their products, take advantage of key markets and contribute to Australia's goal to make agriculture a \$100 billion industry.
 - Budget request: \$5,300,000 over four years
- 3. **Organic Industry Data & Measurement** Implement data collection and reporting, sustainability reporting, and traceability to support industry growth and compliance with international standards.
 - Budget Request: \$2,325,000 over four years

With funding these pillars will provide long-term economic and trade benefits, improve consumer confidence in organic certification, support regulatory alignment and ensure the organic industry will grow and remain competitive globally, unlocking a greater portion of the \$220 billion global opportunity.

Pillar One: Domestic Regulation

Background & Rationale

The organic industry has been advocating for a domestic standard for the organic industry since the introduction of the National Standard for Biodynamic and Organic Produce was introduced for exported organic products in 1992. Over that time Australia has gone from being a world leader in organic regulation to a laggard and is now the last country in the OECD to be without a domestic standard for organic products. This budget is an opportunity for the government to invest in a domestic standard for the organic industry.

With 90% of consumers supporting the introduction of domestic organic regulation¹, domestic regulation will enhance consumer trust, prevent misleading claims, and provide certainty for organic operators. However, regulatory success hinges on appropriate funding to facilitate industry-wide education, compliance support, and ongoing standard updates.

Budget Request

To ensure the successful implementation of domestic regulation, the Australian Organic Industry is requesting an investment of \$5,220,000 over four years across the Department of Agriculture, Fisheries and Forestry (DAFF) and the Australian Competition and Consumer Commission (ACCC). This funding will be allocated across the following key areas:

• Education & Compliance Support

- Consumer Education Informing consumers about the benefits of certification and preventing misleading organic claims - ACCC
- Operator and Industry Groups Education Supporting organic businesses in adapting to the new regulatory framework - DAFF
- Certifier Education Ensuring certification bodies are equipped to maintain compliance under the new regulatory landscape - DAFF
- Regulatory Enforcement & Implementation Supporting oversight, standard updates, and harmonization with global frameworks and strengthening enforcement capacity to oversee compliance with domestic regulation - DAFF and ACCC

This funding will ensure that the domestic regulatory framework is properly implemented, helping to build consumer trust, prevent fraud, and support industry compliance.

Table 1: Domestic Regulation Budget Summary

	Activity	Recipient	Budget
			over 4 yrs
Modernise National Organic Standard	2FTE	DAFF	\$1,600,000
Domestic Regulation			
Education/Transition	2 FTE	ACCC	\$1,600,000
	Comms	ACCC	\$820,000
Implementation	2 FTE	DAFF	\$1,200,000
TOTAL			\$5,220,000

See **Appendix A** for annual breakdown.

Pillar Two: Strengthening Organic Market Access

¹ Australian Organic Limited 2022, Australian Shopper Deep Dive: Exploring "Trust" as a roadblock to purchasing Organic Products, Mobium Group.

Background & Rationale

The *Trading North* report (November 2024)² highlighted a significant opportunity to expand market access for Australian organic exports, particularly in Southeast Asia³. Currently, Australia holds only 1% of the \$220 billion global organic market, despite having the largest certified organic land area worldwide⁴ ⁵. Furthermore, our existing equivalency agreements cover only five trading partners, excluding major trading partners like the Usa, Canada, and South Korea.

Southeast Asia presents a growing premium market for Australian organic products with an expanding middle-class consumer base demanding high-quality, sustainably produced food. Strengthening market access and trade facilitation will unlock export opportunities and support the long-term growth of the Australian organic sector.

While domestic regulation lays the foundation for certification integrity, market access remains a key barrier to industry growth. Addressing these recommendations through targeted funding will reduce trade barriers, improve export certainty, and create opportunities for Australian organic businesses in key international markets.

AOL has consistently engaged with DAFF's Organic Exports team on these challenges, emphasising the need for dedicated funding to implement key recommendations. The Organic Exports team has identified key resourcing needs, particularly in:

- Improving engagement with organic export markets, including facilitating trade agreements and equivalency negotiations.
- Providing greater support for the National Standard Advisory Committee (NSAC) to ensure Australia's organic framework remains internationally relevant.
- Strengthening organic representation within DAFF to ensure organic trade and policy considerations are managed separately from broader food and agriculture policy.

To better address the specific regulatory and trade needs of the organic industry, AOL supports the recommendation for a separation of organics from the broader Food and Organics Division within DAFF, ensuring dedicated resources and a clear focus on organic market access and regulatory alignment. Strengthening Australia's competitiveness in organic trade requires increased investment in regulatory alignment, certification support, and trade facilitation efforts.

In its recommendations, the *Trading North* report specifically outlined the following investments to ensure the Australian Agricultural Sector was primed to make the most of the growing international organic opportunities:

• Significantly expand and improve information provided on the MICOR and Austrade websites to support Australian organic operators entering Southeast Asian markets.

² https://www.aph.gov.au/Parliamentary Business/Committees/House/Agriculture/AgricultureandSEAsia/Report

³ https://www.aph.gov.au/Parliamentary_Business/Committees/House/Agriculture/AgricultureandSEAsia

⁴ ACIL Allen, Mobium Group, & NielsenlQ. (2023). Australian Organic Market Report 2023. Australian Organic Limited.

⁵ Willer, Helga Jan Trávníček and Bernhard Schlatter (Eds.) (2024): The World of Organic Agriculture. Statistics and Emerging Trends 2024. Research Institute of Organic Agriculture FiBL, Frick, and IFOAM – Organics International, Bonn.

- **Establish a dedicated expert organic trade contact officer** for Southeast Asian markets to assist with market access challenges.
- **Provide ongoing funding** to improve resources available for the organic industry.
- **Develop dedicated grant programs** tailored to support organic operators entering Southeast Asian markets.
- Review the domestic regulatory framework to ensure alignment with international standards and competing jurisdictions.

Australian organic exports are projected to grow at an annualised rate of 29% up to the 2026/27 financial year⁶. However, our organic export reach has declined from 62 to 36 countries^{7 8}, reinforcing the need for targeted government investment to reverse this trend and expand market access.

The Australian organic industry is presenting a unified set of priorities to increase market access. Combined with domestic regulation, a total investment of \$5,300,000 over four years in market access expansion and trade facilitation will accelerate international trade opportunities for Australian organic exports.

To implement these measures, AOL is calling for two dedicated resources within the Organic Exports team at DAFF, as well as targeted funding to implement the Trading North report recommendations⁹.

Budget Request

AOL requests an investment of \$5,300,000 over four years to increase Australia's share of the \$220 billion global organic market to beyond merely 1%.

This funding will support:

- Accelerating equivalency negotiations with key trading partners to reduce certification burdens and improve market access¹⁰.
- **Expanding MICOR resources** to provide clearer, more accessible export requirements for organic operators¹¹.
- Appointing a dedicated Organic Trade Counsellor within DAFF's Trade and International Division to lead negotiations and market entry strategies¹².
- **Providing targeted export grants** to assist organic operators in navigating international trade requirements¹³.

⁶ ACIL Allen, Mobium Group, & NielsenIQ. (2023). Australian Organic Market Report 2023. Australian Organic Limited.

⁷ University of Melbourne, Euromonitor International, Mobium Group, NielsenIQ, & Ecovia Intelligence. (2021) Australian Organic Market Report 2021. Australian Organic Limited.

⁸ ACIL Allen, Mobium Group, & NielsenIQ. (2023). Australian Organic Market Report 2023. Australian Organic Limited.

⁹ https://www.aph.gov.au/Parliamentary Business/Committees/House/Agriculture/AgricultureandSEAsia/Report

¹⁰ https://www.aph.gov.au/Parliamentary_Business/Committees/House/Agriculture/AgricultureandSEAsia/Report

¹¹ https://www.aph.gov.au/Parliamentary_Business/Committees/House/Agriculture/AgricultureandSEAsia/Report

¹² https://www.aph.gov.au/Parliamentary_Business/Committees/House/Agriculture/AgricultureandSEAsia/Report

¹³ https://www.aph.gov.au/Parliamentary_Business/Committees/House/Agriculture/AgricultureandSEAsia/Report

Table 2: Strengthening Market Access Budget Summary

			Budget
Market Access	Activity	Recipient	Over 4 yrs
Accelerate priority organic equivalency			
negotiations	2FTE	DAFF	\$1,600,000
Accelerate Organic Trade into SEA			
Dedicated Expert Organic Counsellor for SEA	1 FTE	DAFF	\$1,200,000
MICOR expansion and updates	1FTE	DAFF	\$800,000
Expert content for each SEA Market	1FTE	DAFF	\$300,000
SEA Organic Operator Grant Program (Matched)	1 FTE	DAFF	\$600,000
	Grants x 10	DAFF	\$600,000
SEA Organic Education Program (Trade			
Promotion) - AOL	Trade Shows	AOL	\$150,000
SEA Organic Education Program (operator	Program		
education) - AOL	development	AOL	\$50,000
TOTAL			\$5,300,000

See **Appendix A** for annual breakdown.

Pillar Three: Organic Industry Data & Measurement

Background & Rationale

Australia has over 53 million hectares of certified organic farmland, constituting ~12.4% of the nation's arable farmland and an impressive ~60% of the world's organic agricultural land¹⁴ ¹⁵, yet lacks a consistent and government-supported data collection program to monitor industry growth, land use, environmental benefits and market opportunities. Compared to smaller agricultural sectors that receive significant investment in data infrastructure, organics remain underrepresented in national reporting frameworks.

Unlike Australia, which lacks a consistent government-supported data collection framework for organics, countries such as the United States and the European Union have made significant investments in organic programs¹⁷ ¹⁸. As a result, they have developed a comprehensive understanding of organic farming's economic contributions, market size, and environmental benefits.¹⁹ Without similar investments, Australia risks falling behind in its ability to measure and demonstrate the value of its organic sector on a national and global scale.

https://daff.ent.sirsidynix.net.au/client/en_AU/search/asset/1035603/0

¹⁴ ACIL Allen, Mobium Group, & NielsenIQ. (2023). Australian Organic Market Report 2023. Australian Organic Limited.

¹⁵ ABARES Insights. (2024). Snapshot of Australian Agriculture 2024.

¹⁶ Willer, Helga Jan Trávníček and Bernhard Schlatter (Eds.) (2024): The World of Organic Agriculture. Statistics and Emerging Trends 2024. Research Institute of Organic Agriculture FiBL, Frick, and IFOAM – Organics International, Bonn.

¹⁷ European Commission 2020, Farm to Fork Strategy: For a fair, healthy and environmentally-friendly food system, European Union.

¹⁸ Organic Trade Association 2022, Organic Trade Association Applauds Investment of up to \$300 Million in New Organic Transition Initiative, Media Release.

¹⁹ Rodale Institute 2014, *Regenerative Organic Agriculture and Climate Change: A Down-to-Earth Solution to Global Warming*, Research White Paper.

The *Trading North* report highlighted an opportunity to establish ongoing budgetary funding for organic industry data collection, sustainability measurement, and traceability. As international markets increasingly require robust sustainability credentials and compliance tracking, the organic industry is uniquely positioned to lead due to the annual audits and rigorous data capture embedded in its certification processes.

A well-structured investment in organic sector data infrastructure enables the government to deliver immediate benefits through a scalable system that advances sustainability reporting, trade competitiveness, and industry planning. Measuring the impact of organic farming on biodiversity, carbon storage, and market performance will accelerate policy alignment with sustainability targets and help showcase the role of organic agriculture in Australia's goal achieving a \$100 billion agricultural industry by 2030²⁰.

Budget Request

AOL requests \$2,325,000 over four years to fund DAFF to execute the following:

- Ongoing production of the Australian Organic Market Report to provide up-to-date data on industry trends, growth, and sustainability impacts.
- **Development and implementation of an API-based data transfer system** for certification bodies, ensuring streamlined and consistent data collection.
- Data analysis, industry benchmarking, and regulatory reporting for organics.

Organic Industry Data Recipient Budget **Activity** and Measurement Over 4 yrs Annual Industry Report DAFF \$800,000 Current cost Efficient data transfer - API | Development DAFF \$275,000 Implementation (x 5 certifiers) Certifiers \$250,000 Data Analysis and Management (DAFF) 2 FTE DAFF \$1,000,000 TOTAL \$2,325,000

Table 3: Organic Industry Data & Measurement Budget Summary

See **Appendix A** for annual breakdown.

ORGANIC INDUSTRY OVERVIEW

Australia is an agricultural export nation with over 72 per cent of all production exported²¹. As the organic sector continues to evolve, there is an increasing need to expand market scope and diversify trade access for organic products.

²⁰ https://www.agriculture.gov.au/agriculture-land/farm-food-drought/ag2030

 $^{^{21}\, \}text{Department of Agriculture Fisheries and Forestry 2023}, \textit{Snapshot of Australian Agriculture 2023}.$

Australia currently has over 53 million hectares of certified organic farmland²². This represents approximately 12.4 percent of arable farmland nationwide and about 60 per cent of the world's organic land mass. These figures underscore the organic sector's burgeoning significance within Australia's agriculture industry.

The Australian organic industry is currently worth a conservative total of \$2.6 billion inclusive of direct and indirect contributions to the economy, constituting roughly one per cent of the global organic industry's \$220 billion value. With 3,035 certified organic businesses, this sector supports over 22,000 full-time equivalent workers at any given time²³.

Domestically, there is a growing demand for organic products, with 35 per cent of surveyed shoppers increasing their household budget allocation for organic purchases from 2021 to 2022²⁴. Projections suggest that the domestic industry will more than double in the next five years, increasing to \$5.8 billion from the current \$2.6 billion total²⁵. In terms of trade, the largest export markets for raw organic products are the United States (48 per cent), Singapore (19 per cent), and Malaysia (7 per cent)²⁶. Australian organic exports are projected to grow at an annualised rate of 29 per cent up to the 2026/27 financial year²⁷.

Importantly for the organic industry and its future growth, the demographic most inclined to purchase organic products falls within the 18 to 39 age bracket²⁸, indicating a growing trend among younger generations towards prioritising origin and sustainability in their food choices.

Despite these positive domestic trends, one of the key challenges facing the sector is the devaluation of organic produce when sold into conventional streams due to limited market access. This is partly why the overall value of the industry at \$2.6 billion is considered conservative. Once organic produce is sold into the conventional stream, it is no longer classified as organic.

Greater collaboration between the government, relevant departments, and the organic industry is crucial to surpassing these projections and addressing the disparity where Australia contributes only about one per cent of the global industry's value, despite possessing 60 per cent of the world's organic farmland.

CONCLUSION

²² Australian Organic Limited 2023, *Australian Organic Market Report 2023*.

²³ Australian Organic Limited 2023, *Australian Organic Market Report 2023*.

²⁴ Australian Organic Limited 2023, *Australian Organic Market Report 2023*.

²⁵ Australian Organic Limited 2023, *Australian Organic Market Report 2023*.

²⁶ Australian Organic Limited 2023, *Australian Organic Market Report 2023*.

²⁷ Australian Organic Limited 2023, *Australian Organic Market Report 2023*.

²⁸ Australian Organic Limited 2023, *Australian Organic Market Report 2023*.

The 2024/25 Federal Budget presents a critical opportunity for the Australian Government to invest in Australia's organic industry, ensuring its long-term sustainability, competitiveness, and contribution to the broader agricultural sector. With the introduction of the *National Organic Standard Bill 2024* setting the groundwork for domestic regulation and the *Trading North* report reinforcing the need for stronger market access, it is imperative that funding is allocated to drive industry growth and support regulatory compliance.

Despite Australia having the largest certified organic land area globally, there is still no dedicated government funding for the sector. In contrast, the EU allocates 30% of agricultural funds to organics under its Farm to Fork Strategy, and the United States has invested over \$300 million USD into their organic industry. Without similar investment, Australia risks falling behind, losing valuable market opportunities, and facing increased trade barriers due to misalignment with international organic standards.

AOL's budget submission outlines targeted investments across three key pillars, with an additional fourth pillar pending adoption of current proposals):

- 1. Domestic Regulation Implementation
- 2. Market Access Implementation
- 3. Organic Industry Data & Measurement
- **4. Traceability** (additional funding requested if current FSANZ P1055 and Department of Health proposals to exempt certain genetically modified (GM) goods from mandatory labelling are adopted)

These investments will ensure that Australia's organic industry remains globally competitive, aligned with sustainability goals, and positioned for long-term growth. By supporting these initiatives, the Federal Government has the opportunity to strengthen consumer trust, improve export outcomes, and reinforce Australia's leadership in sustainable agriculture.

AOL urges the Government to act now to support an industry that continues to deliver worldclass organic products to Australian and global markets. Strategic investment today will secure the future of Australia's organic sector, ensuring its continued success and contribution to the national economy.

About AOL

Australian Organic Limited (AOL) is the peak industry body for the organic industry in Australia that strives to create a positive impact for humans, animals, and the environment, now and into the future. AOL is led by an experienced team committed to progressing the interests of the organic sector and delivering a world where organics is recognised for its environmental, social, and economic benefits

APPENDIX A: AUSTRALIAN ORGANIC BUDGET REQUEST

	Year 1		Year 2		Year 3		Year 4			
ORGANIC INDUSTRY BUDGET REQUEST 2025	Recipient	Activity	Budget	Activity	Budget	Activity	Budget	Activity	Budget	TOTAL
PILLAR 1: DOMESTIC REGULATION										
Modernise National Organic Standard	DAFF	2FTE	\$400,000	2FTE	\$400,000	2FTE	\$400,000	2FTE	\$400,000	\$1,600,000
Domestic Regulation										
Education/Transition	ACCC	2 FTE	\$400,000	2 FTE	\$400,000	2 FTE	\$400,000	2 FTE	\$400,000	\$1,600,000
		Comms	\$200,000	Comms	\$120,000	Comms	\$300,000	Comms	\$200,000	\$820,000
Implementation	DAFF	2 FTE	\$400,000	2 FTE	\$400,000	1 FTE	\$200,000	1 FTE	\$200,000	\$1,200,000
TOTAL										\$5,220,000
PILLAR 2: MARKET ACCESS										
Accelerate priority organic equivalency										
negotiations - DAFF	DAFF	2FTE	\$400,000	2FTE	\$400,000	2FTE	\$400,000	2FTE	\$400,000	\$1,600,000
Accelerate Organic Trade into SEA										
Dedicated Expert Organic Counsellor for SEA	DAFF	1 FTE	\$300,000	1 FTE	\$300,000	1 FTE	\$300,000	1 FTE	\$300,000	\$1,200,000
MICOR expansion and updates	DAFF	1FTE	\$200,000	1FTE	\$200,000	1FTE	\$200,000	1FTE	\$200,000	\$800,000
Expert content for each SEA Market	DAFF	1 FTE	\$150,000	1 FTE	\$150,000					\$300,000
SEA Organic Operator Grant Program (Matched)	DAFF	1 FTE	\$200,000	1 FTE	\$200,000	1 FTE	\$200,000			\$600,000
		Grants x 10	\$100,000	Grants x 20	\$200,000	Grants x 30	\$300,000			\$600,000
Promotion)	AOL	Trade Shows	\$75,000	Trade Shows	\$75,000					\$150,000
		Program								
SEA Organic Education Program (operator		development								
education)	AOL	and delivery	\$40,000	Program Delivery	\$10,000					\$50,000
TOTAL										\$5,300,000
PILLAR 3: INDUSTRY DATA & MEASUREMENT										
Annual Industry Report	DAFF	Current cost	\$500,000	Ongoing	\$100,000	Current cost	\$100,000	Current cost	\$100,000	\$800,000
Efficient data transfer - API	DAFF	Development	\$200,000		\$25,000		\$25,000		25,000	\$275,000
	Certifiers x	Implementation	\$250,000							\$250,000
Data Analysis and Management	DAFF	2 FTE	\$250,000	2 FTE	\$250,000	2 FTE	\$250,000	2 FTE	\$250,000	\$1,000,000
TOTAL										\$2,325,000
GRAND TOTAL										\$12,845,000

APPENDIX B: TRACEABILITY – ADDITIONAL FUNDING REQUESTED <u>IF</u> CURRENT FSANZ P1055 AND DEPARTMENT OF HEALTH PROPOSALS TO EXEMPT CERTAIN GENETICALLY MODIFIED (GM) GOODS FROM MANDATORY LABELLING ARE ADOPTED

Background & Rationale

Traceability is fundamental to maintaining the integrity of organic certification and consumer confidence. However, recent proposals by FSANZ P1055²¹ and the Department of Health²² seek to exempt certain genetically modified (GM) goods from mandatory labelling^{23 24}, which would have significant governance and financial implications for the Australian organic industry both domestically and internationally. The funding and support outlined below would be required by the industry should these changes be adopted.

Without clear traceability mechanisms, organic operators will face greater challenges in ensuring their inputs remain free from genetic modification (GM) and editing – a core requirement of the organic system. This increased risk of contamination threatens the viability of organic certification, market access, and consumer trust in Australian organic products. Given that organic production prohibits the use of GMs, a weakening of traceability standards directly impacts the industry's ability to comply with organic regulations and maintain export credibility.

Building on the challenges posed by the FSANZ and Department of Health Bill, high labor costs have already driven many seed production programs offshore, reducing domestic availability and increasing reliance on imported seed—bringing significant biosecurity risks. For organic producers, this shift limits access to certified organic (non-GM) seed, narrowing options and increasing vulnerability to regulatory uncertainty. With the Draft Gene Tech Amendment bill set to redefine key definitions for GM, existing derogations that currently allow the use of non-organic seed with GM-free declarations would no longer be considered reliable. To protect organic integrity, mitigate biosecurity risks, and support the development of seed varieties better suited to Australian soils, a dedicated, domestically funded seed program is critical. Such an initiative would be a foundation for securing a stable, traceable, and GM-free seed supply while fostering landrace varieties that enhance long-term resilience and sustainability within the organic sector.

Australia lags international competitors in developing robust traceability systems for organic inputs. The EU, the United States, and other major organic markets have already invested in enhanced electronic traceability frameworks to protect their organic industries. If Australia does not take similar action, local organic producers may face higher costs and regulatory uncertainty, jeopardising both domestic and international market access.

A proactive investment in traceability infrastructure would provide organic operators with the tools they need to verify the integrity of their inputs, reduce the risk of contamination, and ensure compliance with global organic certification standards. This investment aligns with broader agricultural and food safety goals, ensuring Australia's organic industry remains competitive in an increasingly regulated global marketplace.

Budget Request (if proposed GM changes adopted): \$19,050,000 over four years

- **Implement a national GM supply chain testing program** to ensure organic integrity by detecting upcoming gene modification contamination risks and verifying compliance with organic standards.
- Fund dedicated staff to monitor and communicate GMO deveopments, supporting regulatory oversight, communication and education to operators and compliance.
- Support organic seed production programs, safeguarding the availability and future of non-GM seed stock for organic farms.
- **Develop centralized digital certification systems,** improving accessibility, efficiency, and security of organic certification processes.

Table 5: Traceability Budget Request (should proposed changes to GM definitions be approved)

TRACEABILITY										
Supply Chain Testing (Min \$10K per operator)	TBC									
				Operator testing	\$3,000,000	Operator testing	\$4,000,000	Operator Testing	\$6,000,000	\$13,000,000
Monitoring and communicating GMO developments	TBC									
		2 FTE	\$400,000	2 FTE	\$400,000	2 FTE	\$400,000	2 FTE	\$400,000	\$1,600,000
		Comms	\$150,000	Comms	\$100,000	Comms	\$100,000	Comms	\$100,000	\$450,000
Organic Seed Production Program	TBC	Grants	\$500,000	Grants	\$500,000	Grants	\$750,000	Grants	\$750,000	\$2,500,000
Centralised Digital Certificates	TBC	Development	\$600,000	Implementation	\$300,000	Implementation	\$300,000	Implementation	\$300,000	\$1,500,000
TOTAL			·					·	·	\$19,050,000