

QBR SECRETARIAT ADDENDUM:

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SUBMISSION TO THE QUARANTINE AND BIOSECURITY REVIEW

General comments

Because of the very large number of items for discussion presented in the issues paper, it has been difficult to provide a succinct and cohesive submission. An attempt has been made therefore to supply a brief response to most of the issues in the document. Here I summarise the most important of these in slightly more detail.

Interface between AQIS and BA

The advice on quarantine policy being given to AQIS by BA is in many cases incorrect and in nearly all cases provided after excessive delay. The reasons for this are several.

Most of the staff of BA does not have a sufficiently critical scientific background to make the appropriate recommendations on quarantine policy to AQIS. Many are employed directly from university and have never worked in Academia. They therefore are referring to such documents as Wikipedia and the Australian Common Names list that are not scientifically rigorous documents. Under-qualified staff are unable to distinguish between primary and secondary sources.

Allied to this is the related issue that senior management in BA having responsibility to convey advice to AQIS do not have an appropriate scientific background to assess the recommendations by policy made by their junior staff. There is a tendency for a risk-averse culture to predominate.

The solution is to recruit to BA only those persons with at least five years experience in a scientific discipline with experience of writing and publishing scientific documents. The early training of personnel recruited should include a rotation of several weeks to AQIS so that a better understanding of the quarantine controls in operation result.

Import Risk Analyses

1. Delivery

Several scheduled and notified Import Risk Analyses (IRAs) are either extremely delayed or have been shelved completely. The reason for the delays are: numerous changes in the standardized format and contents required, an excessive amount of consultation both within and without government, a high turnover of staff and changing political imperatives.

A considerable number of IRAs that have been announced in recent years have been partially or nearly completed after considerable resources have been used, but have been, since BA because a prescribed agency, abandoned. They include several where it is vital to improve quarantine controls on imports and/or where local industry is requesting a review and revision so that currently unnecessarily restricted imports can be permitted. These IRAs include Ornamental Bulbs, Snow Peas, Edible Mushrooms, Guava Rust, Onions and so on.

The solution is to allow a more flexible delivery in format and content of IRA's and to retain staff to complete IRA's they have commenced on a part time or consultancy basis until completion. Efforts should be made to reduce consultation time by abandoning reviewing panels, using only web based methods for community consultation and reducing submission times and restricting the length of submissions allowed.

2. Risk Assessments

The risk assessment categories calculated by BA scientific staff has, in some cases, been rejected by senior management or by external panels, because of political expediency and/or to appease local industry. This is the case with Fire Blight on New Zealand apples and Moko disease of bananas. The quarantine controls imposed as a result in the final and draft IRAs as a result have caused in at least one case, of an appeal by the exporting body for a WTO decision. The original scientifically rigorous assessment of these two diseases concluded that the risk of them entering Australia on apples from New Zealand and bananas from the Philippines was negligible. An objective assessment of the pathways as described in the IRAs would support this position.

The solution is for decisions on risk assessments not to be influenced by protection Australian industry but rely on scientific evidence only. Statistical models are probably unsuited to providing a correct analysis of pathways because of the complexity of and variables in the importing process. Also they cannot easily be understood or more importantly checked by anyone but a specialist.

The solution is to exclude any person with an association with local industry from being involved with producing an IRA and to ensure senior management are not influenced by pressure perceived or actual from vested interests of any kind either in Australia or from overseas.

Research

1. The area of research where Australia has been gradually declining over the last probably twenty years is that of taxonomy that is describing the

fauna. Without knowledge of what species are present in Australia, correct assessments of what commodities are carrying species that are alien to Australian cannot be made. Overall the invertebrate fauna is probably at most 20% described. Research on risk analytical methods and treatment methods has progressed disproportionately to the amount of resources provided to taxonomic research. There is not a lack of personnel as a fair number of specialists are employed in other tasks but research money is required.

The solution is to allocate at least \$500,000 a year from AQIS to provide support for taxonomists to describe of new Australian species in groups that are intercepted at the border and to provide support to DEWHA to double the annual budget for grants to ABRS.

2. Without a detailed, that is complete species level, database of interceptions that can be searched both at a species, commodity, country, year etc level, success of inspections and control measures cannot be assessed. New Zealand quarantine authorities are able to maintain such a data base but in Australia, although some effort was put into this area in the past, the requirements and fields for the recording the data have now been so downgraded, that it is virtually useless both for modifying quarantine policies and for monitoring effectiveness.

The solution is for AQIS to upgrade their interception data base in consultation with BA scientific personnel i.e. those that actually write IRAs and not senior management and to allocate adequate budget to obtain and pay for identifications of their interceptions by specialists so that the data can be entered at species level to the data base.

Private consultants

Problems may and can emerge with the use of private consultants as security and auditing controls cannot be applied with the same rigour as with employed staff. The use of consultant veterinarians at AQIS's Eastern Creek facility may allegedly have been the cause of the the spread of horse flu from there.

It is suggested that instead of specialists of various kinds being used as consultants, that they be employed formally on a part time and/or temporary basis allowing for closer supervision by permanent employed staff.