

SUBMISSION TO THE QUARANTINE AND BIOSECURITY REVIEW.

Submission by: Peter Pedersen.

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Introduction:

Thank you for the opportunity to contribute to this review.

I am currently on secondment from AQIS, and working with the Commonwealth Department of Environment, Water, Heritage and the Arts – *Australian Antarctic Division*.

I have been employed with AQIS for the past 18 years, and up until my recent secondment, was principally based in Cairns and working within AQIS's "*Northern Australia Quarantine Strategy- NAQS*". During my employment with the agency I have been posted to a number of locations including the Torres Strait, where I was the Operations Coordinator for a two year period, followed by a 12 month placement in East Timor, where I was responsible for a project that established a quarantine service for the new country. In between these postings I have been responsible for the delivery of NAQS operational activities throughout Cape York Peninsula and have also worked on the programs projects across the Northern Territory, northern Western Australia and Papua New Guinea.

Having worked "across the quarantine continuum"; pre border in overseas counties, at the border in Torres Strait and beyond the border for many years in northern Australia, I believe has given me a broad understanding and insight into the particular quarantine risks facing the region (especially Cape York Peninsula and Torres Strait), and as an operationally focused member of the NAQS team, an ability to understand in what practical ways AQIS's roles and responsibilities can be best discharged in this high risk region of the country.

Below, I have proposed two areas where I believe the NAQS program may be able to improve its current operations, to more thoroughly and efficiently address the risks faced in the region.

Item three is less NAQS specific and relates to the AQIS organisation as a whole.

ITEM ONE:

THE DISENGAGEMENT OF AQIS (NAQS) FROM STAKEHOLDERS IN CAPE YORK PENINSULA AND THE GULF.

Currently, the area of responsibility deemed to fall under the NAQS program is defined on the mainland, as the coastal strip of land 20 km inland from the sea, from an area north of Cairns around the top of Australia to Broome in the west. There seems very little practical relevance or scientific background to this arbitrary 20 km figure, and (in my view) in recent times, a strict adherence to this policy and a subsequent withdrawal of NAQS activity beyond this margin, has resulted in a deterioration in the awareness of local stakeholders in relation to important quarantine issues, a disengagement by AQIS/NAQS of a targeted and strategically important community in northern Australia, and an abandonment of a number of Aboriginal communities, that were once (and for many years previously), regularly in contact with NAQS staff.

Where community awareness programs have been maintained to a limited degree, engagement activity has been restricted to occasions when scientific surveys in a particular area are taking place. While on the face of it, this would appear to be an efficient and prudent stance, there are significant issues that can harm AQIS's reputation when this approach is adopted. It is unrealistic in most communities to expect to be able to make contact with the various groups within a community (Health Workers, Councillors, Schools, Rangers, Traditional Owners), during one short visit to a location. Even more so, if the AQIS staff on the ground are busy trying to undertake complex logistical activities such as a large scale survey program in a remote area.

What usually results, is that any community engagement activity is given only passing consideration and the ability for Officers to access important stakeholders is limited. AQIS can be easily seen then, as only interested in the community for its own purposes. This approach is viewed as selfish and disrespectful in Indigenous communities, and the agency not only damages its reputation, but misses the opportunity of developing and maintaining worthwhile and long-lasting relationships. This approach is born from a lack of any real understanding as to how these communities operate, and follows the example of countless failed government programs in Indigenous communities.

My view is that it is far better to take the time to genuinely engage with the wider community, which due to the nature of these places may well involve a number of visits over some time. Building relationships and understanding, and accepting that this activity when done properly, will likely take some time and require regular interaction, is a fact of life when working in these communities. Expecting for example, the school to be operating and able to take in visitors, the clinic to have time for discussions and the council to be sitting all in one afternoon that happens to coincide with the start or end of a survey program is highly ambitious, places regional AQIS field Officers (who understand the workings of these communities and are

conscious of how poorly this is perceived by local people) under unnecessary pressure and is considered by the community as a visit “on AQIS’s terms”.

Until recent times, NAQS in Cape York Peninsula was viewed as a model program by many other state and commonwealth agencies, and enjoyed widespread community acceptance and respect amongst indigenous and non indigenous communities as well as others involved in natural resource management and indigenous issues in the region. My opinion is that as a result of this new approach, this is no longer the case, and much of the work of the last 15 years has been lost.

The Situation in Cape York Peninsula Indigenous Communities

At a time when the Commonwealth Government is so focused on engagement with Indigenous communities, the NAQS program in Far North Queensland has withdrawn or reduced contact from many very important, influential and strategic indigenous (and non indigenous) communities, that had previously had a very high level of NAQS interaction and quarantine awareness, due to the fact that their community centres or townships, happen to lay outside the 20 km strip of coastal land. This is despite the fact that the traditional lands belonging to these groups often extend vast distances along the coast and even to offshore islands.

As a result, at no time in the past 15 years has NAQS had less involvement in Cape York Peninsula indigenous communities in this high risk area of the mainland, than it has in the previous two. (compare operational plans prior to 2006 to those since that time).

Very few government departments either state or federal had the level of contact, or acceptance within the communities or enjoyed such a long history of involvement with the Indigenous communities in Cape York Peninsula, than did NAQS. Up until two years ago, the program could boast of having a regular presence (2-3 visits/dry season), to every Cape York Peninsula Indigenous community north of Cooktown. These visits included sessions delivered on quarantine awareness to schools, councils, local health clinics and ranger groups and had been in continuous operation for many years. Importantly, the level and type of engagement was at the request of the communities themselves.

My experience in Cape York indigenous townships over the past 18 years has been that the community’s first priority is for outside visitors such as AQIS Officers to engage primarily the local school, followed usually by genuine practical involvement with Ranger groups.

As an example, a visit to an indigenous Cape York school to take part in a sports day may seem from the outside as an indiscriminate use of NAQS resources. However, taking part in a high profile community event and being seen to have an interest in the community outside a narrow focus of the programs core business is important to Indigenous communities. The presence of a Quarantine Officer in the township is seen as more than a “what’s in it for me” visit by another government department, and demonstrates instead a long term commitment and more genuine relationship with the local people.

The rationale for this level of interaction and engagement is based largely on the recommendations of the Nairn review (and others), that identified Cape York Peninsula as a high risk part of the country deserving of special attention and a high profile AQIS presence. The review recommended a partnership approach and a “continuum of quarantine” beyond the border and into areas where exotic pests and diseases may have become established. The review’s fundamental underlying theme was to encourage the community to take a shared responsibility approach to quarantine by “...encouraging community ownership of quarantine issues..”.

A community member who has had a visit by a Quarantine Officer to his or her class for every year of their schooling, is familiar with quarantine principles and how they can effect their way of life, has seen officers working closely with other community members such as Rangers and is comfortable and accepting of their role in the community, is much less likely to breach regulations relating to quarantine when undertaking visits to Torres Strait, and to report issues of quarantine concern that they may encounter. An understanding and acceptance of quarantine principles, and a respectful relationship with the agency, also facilitates NAQS access to important traditional lands to undertake survey and surveillance work.

It is a great shame that these relationships have been let lapse and the trust developed over so many years has been diminished. It takes a great deal of time and patience to rebuild such relationships in Indigenous communities, who are so overwhelmed with transitory government programs and service providers.

As an example, Hopevale community is an important Aboriginal settlement at the base of Cape York Peninsula. The local indigenous community has strong ties not only to a number of other Indigenous communities in the region, but also includes residents who retain traditional ownership of huge swathes of coastal land extending hundreds of kilometres up the east coast, which include a number of important anchorages for itinerate vessels. These areas have long been of interest to AQIS, as they represent landing places where overseas vessels could land illegally and potentially introduce exotic pests and diseases. These locations are also regular anchorages for vessels that have visited Torres Strait, and could be carrying items of quarantine concern from that region. Because the township itself lies on the border of the 20 km margin, AQIS visits to this community were cancelled, after a continuous 15 year involvement that had resulted in an excellent community Ranger partnership, a long term association with the local school and health clinic, and very good relations with the community council. This long standing relationship allowed AQIS access to important traditional lands to conduct vessel surveillance and scientific surveys, as well as maintain a high level of quarantine awareness amongst the community. In terms of developing and maintaining relationships (as suggested in the Nairn review), few could have been more important that this one for NAQS, yet it has now been more than two years since any contact has been made with Hopevale.

A similar situation exists with Coen, a community that lies well beyond the 20 km margin, but whose community members retain ownership of vast areas of coastal lands. Visits to some other communities have been maintained, but with much less frequency than previous years, and with limited interaction beyond short focused surveys with little genuine community engagement.

Other Aboriginal communities and rural townships with significant Aboriginal populations that have been withdrawn from the NAQS engagement strategy include Wujal-Wujal, Laura, Burketown, Karumba, Lakeland, Cooktown and Normanton. Communities where NAQS contact has been reduced in recent years include Kowanyama, Pormpuraaw and Lockhart River.

The Situation in Cape York Peninsula Non-Indigenous Communities

The same withdrawal of contact has extended to National Park Rangers, commercial Tourism Operators, Health Workers and Primary Producers in the region. The lands under the control of these groups cover huge and strategically significant coastal areas of Cape York Peninsula, and the nature of these groups activities regularly brings them into contact with issues of quarantine concern, be it potential illegal landings or suspected exotic pest or disease outbreaks. Again, due to the fact that their ranger bases, clinics or homesteads are outside the 20 km coastal margin- contact has been withdrawn.

This reduced interaction and loss of familiarity with NAQS objectives amongst these important groups has had a flow on effect in relation to land access issues. It was noted in previous years, that the regular extension visits carried out by NAQS Officers to cattle stations, ranger bases and the like helped foster an understanding of quarantine objectives, an appreciation of the risks and a willingness for cooperation in relation to animal and plant survey activity. Sadly, this high level of interaction and resultant cooperation has diminished in recent times.

During a period when the risks to the region have never been so high – with recent foreign fishing vessel landings, increasing numbers of tourists in the area, and more and more pests and diseases of concern in the countries to our north- AQIS is dismantling a successful and long standing community awareness project, at the time and in a location when it is most needed.

The Current Situation.

Much of the programs attention in the past two years has been to focus on communities who have been exposed to potential risks associated with foreign fishing vessel landings, and in developing commercial relationships with indigenous councils. My view is that this is to be applauded, especially the expansion of NAQS activity in some Northern Territory communities. These townships are crying out for worthwhile employment opportunities for their residents, and the ability for NAQS to pay real wages to groups such as community Rangers is an excellent way of providing such incentives. Clearly, illegal foreign fishing vessels represent a significant quarantine risk. However, the Commonwealth government provided significant additional funds to allow these new initiatives to take place, and it is disappointing that it seems these latter activities were adopted in place of - and not in addition to, previous long standing and successful programs.

The primary argument presented for the cancellation of extension programs in Cape York Peninsula, is that they fall under the responsibility of the state government.

However my view is that this stance is inconsistent with the recommendations of the Nairn review, which placed considerable importance on

- The Continuum of quarantine including post border activity
- Engendering a community ownership of quarantine
- And a partnership approach not only with local inhabitants, but also with other government and non government agencies.

While it is understandable that AQIS is reluctant to take responsibility for areas that lie outside its jurisdiction, and the organisation should not be the stand in agency for state government responsibilities, Cape York Peninsula represents a unique region both culturally and in a practical national quarantine security sense. In my opinion, the entire region is important to AQIS, not just the coastal strip.

The application of the 20 km coastal margin approach and structuring engagement visits as an “add on” to survey programs, is a solution that may appear as a neat fit when taking a clinical view of the issues from an outside perspective. However I believe on the ground realities dictate a more considered and holistic approach to commonwealth quarantine security responsibilities in the area.

The “20 km coastal margin” view also assumes that only those few residents who live in the thin coastal margin, will have cultural links to Torres Strait or will ever be in a position to sight and report any issues of relevance to AQIS such an exotic pest outbreak or illegal landing. The reality is that the vast majority of peninsula and gulf residents have much to offer and are vital contacts for AQIS. This is the very reason they were identified as key targets and received the attention they did, for such a long time.

In my view, no other region in Australia is a sustained, well considered, well resourced, culturally appropriate and coordinated program of ongoing and widespread community engagement more important or relevant to AQIS, than in Cape York Peninsula and the Gulf.

The regions geographical proximity to Torres Strait and PNG, the large numbers of tourists transiting down through the area from these high risk zones, recent illegal foreign fishing vessel activity and the close cultural links with the indigenous communities of the mainland and those in Torres Strait will continue to make this entire area, not just the coastal fringe, of prime importance to AQIS well into the future, and the agency can ill afford not to have the cooperation and respect of all its residents.

PROPOSAL FOR CONSIDERATION.

1/ Re establish a widespread and practical community engagement program in Cape York Peninsula and the Gulf, and discontinue the “20 km coastal margin” approach to determining jurisdictions that is currently in place. Instead divide responsibilities (education and surveillance) in NAQS areas between AQIS and other state agencies based on particular pests and disease status.

AQIS/NAQS to take responsibility (education and surveillance) for exotic pests and diseases that appear on the NAQS target list (Foot and mouth disease, Screw worm fly, rabies, papaya fruit fly, exotic weeds etc). State Governments to take responsibility for endemic pests and diseases (cattle ticks, domestic weeds, domestic fruit flies etc).

In this way, NAQS targeted public engagement and survey activities would be directed to stakeholders and locations based on the risk of incursion or exposure, and not whether or not residents reside within a thin coastal strip of land.

Of course, if an exotic pest or disease was found, then the current arrangements would come into effect, and the states would take over responsibility for eradication or containment. This segregation of responsibility would fit the “continuum of quarantine” rationale and provide all agencies with clear areas of responsibility. This approach would stand up to outside scrutiny by stakeholders and the general public as a considered and practical approach to quarantine issues in this region, reflecting cultural, geographical, scientific and practical realities and less on arbitrary boundaries placed on a map.

2/ If this activity is deemed outside the responsibility of AQIS/NAQS, then consideration should be given to providing a physical presence for DAFF's Product Integrity and Animal and Plant Health Division in northern Australia (who have a role to play in education, monitoring and surveillance, emergency preparedness and coordination). Little can be expected from public awareness campaigns in remote rural and indigenous communities with simple publication runs of materials and no “on the ground” representatives to drive projects. The disadvantage with this approach is that there would be multiple DAFF representatives in some communities, dealing with very similar issues and causing confusion and frustration amongst stakeholders.

A single AQIS officer visiting a community is able to attend to a number of objectives ranging from educational visits, pest and disease surveys, border security issues etc. Splitting this activity between two different groups within DAFF and having different representatives from the same department interact with communities on very similar issues is a less resource efficient approach. Hence, a preference for proposal 1 above.

ITEM TWO:

CLEARANCE OF TORRES STRAIT FLIGHTS.

At present, aircraft Pilots are required by legislation to advise AQIS if they intend to travel between the Torres Strait Protected and Special Quarantine Zones (TSPZ/ SQZ), or from either of these two zones back to the mainland. Quarantine “clearance” of these aircraft can take a number of forms ranging from pre clearance of the aircraft passengers and cargo in Torres Strait before arrival back to the mainland, or clearance on arrival. However, the clearance regime does not in my view match the potential risks associated with these arrivals. Depending on whether or not an unscheduled uncleared aircraft arrives during hours or after hours (and hence depending if the clearance will result in the payment of overtime to an on call Quarantine Officer or not), may well decide the level of clearance that the aircraft is subject to.

A regular “in hours” clearance of a Torres Strait aircraft into an airport like Cairns would result in the passengers being questioned by an officer, the possibility of a detector dog or X-ray screening of any baggage, and a random search of luggage, cargo and the aircraft interior. This level of clearance would generally match the level of attention that a similar sized aircraft arriving from a destination such as PNG may receive. However, an aircraft arriving out of hours may well only result in an AQIS officer talking to the aircraft Pilot by mobile phone, asking if there is any quarantine risk material (QRM) onboard and not visiting the aircraft at all. This procedure is referred to as “phone clearance”. Not only does this form of clearance place the onus on the Pilot to know what is in his or hers passengers luggage and cargo (*it is unreasonable to expect a Pilot to know what the contents of his or her passengers luggage is*), but creates a sense amongst both the commercial airlines operating in the region, as well as local inhabitants who fly to and from Torres Strait, that quarantine integrity is only an “in hours” concern. This approach to flight clearances also has a negative impact on staff, who find the procedures confusing and inconsistent. While the number of flights that are cleared by “phone clearance” is not great, it remains difficult to justify to stakeholders, why these clearances are conducted “when funds allow”, and not as part of a scientifically based inspection regime.

By way of example and comparison:

A light aircraft with a Pilot and passengers departs Daru (regional capital of the Western Province of PNG – with a very similar pest and disease status to many of the northern Torres Strait Islands), en route to Cairns. No matter what time of the day or night, the aircraft will be processed through the regular Customs and AQIS formalities, which in all likelihood in Cairns would result in 100% x-ray screening of the luggage, inspection of the aircraft interior, questioning of passengers and aircrew and any follow up activities such as shoe cleaning, treatment of quarantine items and disposal of any high risk material. An appropriate level of intervention based on the risk profile of the aircraft.

By comparison, an after hours aircraft arriving in Cairns from Saibai Island - an Island only a few kilometres off the PNG coastline with a number of very serious pests and diseases not found on the mainland (*including seasonal incursions of the Papaya fruit fly – considered the worlds worst horticultural pest*), where for one

reason or another the local Islander Officer has been unable to “pre clear” the aircraft, may well be subject to a simple mobile phone conversation from a quarantine officer, enquiring of the Pilot if any QRM is on board (including in passengers luggage). If the Pilot advises that there is nothing of quarantine concern, the aircraft, its passengers and crew will not undergo any physical quarantine screening whatsoever.

In fact under current arrangements, even if the Pilot confirms that there may be items of quarantine concern on board, AQIS Officers are directed to ask the Pilot to secure these items in a place such as the airline company’s staff fridge, where they can be collected by Officers the next working day. Apart from being a less than ideal situation from a quarantine security point of view, this situation potentially casts AQIS in an unprofessional light.

Two aircraft with very similar risk profiles, but treated very differently in terms of quarantine clearance.

While there are times when out of hours inspections of such aircraft are conducted, incurring overtime costs, the application of these procedures is not consistent and when resources are limited the inspection regime is relaxed.

I believe this situation demonstrates an inconsistent approach to risk management.

PROPOSAL FOR CONSIDERATION:

- 1/ That AQIS conduct a comprehensive risk analysis of aircraft arriving from Torres Strait, and that a consistent and scientifically based approach be taken towards their clearance.
- 2/ That all aircraft departing Torres Strait for mainland Australia be either pre cleared (involving an actual inspection of cargo and baggage) or cleared on arrival (again involving an actual inspection regime) and not “phone cleared”.
- 3/ That additional infrastructure be placed at Horn Island, such as x-ray facilities and a permanent AQIS presence at the airport for all mainland departures, to facilitate thorough and efficient passenger and baggage screening.
- 4/ That consideration be given to making the current arrangements whereby aircraft arriving from Torres Strait are asked to undertake disinsection procedures on a voluntary basis, mandatory under amended legislation.

ITEM THREE:

PROVISION OF AN “ELECTRONIC STAFF SUGGESTION BOX”

Based on my previous involvement with AQIS, primarily as an operational officer in a regional centre, by far and away its greatest strength lies in the commitment of its staff. I think we are particularly blessed in the Far North region, with a staff made up of high numbers of Indigenous employees, and those with strong agricultural / environmental / industry backgrounds. AQIS Officers are on the whole- extremely committed to quarantine.

It is sometimes a frustrating process however, especially for those staff at a lower level, and perhaps from a smaller region, to raise issues of concern that could very well improve quarantine integrity. Few people in the organisation have a better view of operations, than those on the front line. On occasion, it can prove difficult to have concerns relating to operational aspects considered in any thorough way and staff can sometimes feel powerless to highlight a potential problem in the system.

PROPOSAL FOR CONSIDERATION.

1/ Introduce a web based “national electronic staff suggestion box”, whereby staff are able to submit a suggestion relating to operational efficiency or procedural issues, without fear or favour, to a panel in head office. This panel should include some senior managers, as well as representatives from the regions, who could consider any proposals or suggestions based on their merits. Staff should be kept up to date with the proposals path through the process (perhaps with an electronically issued “receipt number”), and be provided with written feedback as to any outcome. This would provide a sense that at least the issues have been considered, even if the suggestions are not taken up.

***Note- there should also be options for a faxed submission, for those Officers without access to the intranet.*