

Issue of Quarantine and Biosecurity Review

First issue: Needing a permit to import certain goods is unnecessary, because it is Quarantine's Duty to maintain low risk. E.g. Quarantine set a law stating that fish can only be imported without heads, otherwise a permit is required to import fish with heads. Their theory is that fish heads are infected easier. What is the difference between fish with or without heads? A permit cannot reduce the risk; it is to make the importer more costly for permit and inspection by Quarantine.

ALOP is not applied in a consistent way because this term does not specify what is an appropriate level of protection, up to what degree do you consider is an appropriate level of protection? ALOP can only be viewed as personal opinion only, because there is no definite degree for the word "appropriate". If a permit can allow fish with heads to pass than ALOP is not about maintaining a low risk but about revenue. ALOP does not apply to safety e.g. Glass—fully documentation complies with Quarantine completely and under the industrial notice that Quarantine insists to inspect and charge which found nothing during the inspection and cause the importer time and money wasted.

Exporters, consumers and the economy should be considered when developing Quarantine and Biosecurity arrangements. Especially the matter in finance involved which is not economically.

So far there are no benefits to Australia's current approach to Quarantine and Biosecurity. E.g. Equine Influenza is an exotic disease of horses, this disease is not supposed to be present in Australia but yet, it has not been prevented (during the Melbourne Cup, suddenly horses seemed to have caught the disease). Again, ALOP did not help prevent the spread of this disease. How did this disease even come to exist in Australia? Another issue is using gamma radiation to treat medicine. Such as Linzhi (*Ganoderma Lucidum*) has no threat for human external and internal use, this kind of herb has been used for over thousands of generations in the East and has not caused any medical problems or death to anyone. But Quarantine insisted that a permit is to be required when importing this kind of herb and an additional treatment of gamma radiation is required. Gamma Radiation has been known to cause death to people if used in high doses and even low doses can cause cancer and birth defects. Furthermore, gamma radiation also destroys the herb's medicinal properties. How can this be safe and be used as a way of treating human consumption?

Australian risk assessment has no risk analysis. There is no risk management to reduce risk and measuring. This is not sufficiently timed, it also causes the product to be more expensive plus revenue rising by AQIS and permit fee charges on goods imported. The eminent Scientist Group is not appropriate; this group is not consulted by Quarantine.

The Biosecurity and Quarantine framework is inadequate to manage and analyse risks to the environment. They do not have sufficient skills/ability to assess risks. If they did, equine influenza would never have entered Australia.

There is also no threat to Australian marine life from ships' hulls and Biosecurity is not required for the framework either. The pollution of ship engines in water are not under Quarantine or Biosecurity concern.

Risks are also not analysed, not specified and there no low-risk guidelines. Import policy determines and the permit conditions do not reduce the risk of the import risk goods, it is only raising revenue purpose. Goods been further processed overseas which comply with international standards are not necessary to go through Quarantine, Compared to raw materials which have not been processed yet.

There is no adequate auditing and verification. It should be applied to the goods and products of itself and its properties of itself, to determine whether it affects the risk to humans, animals, plant-life and health. The Quarantine and Biosecurity Continuum monitoring ensures the system function should be pre-border and border only, post-border is too late.

The Biosecurity should be open for free consulting and specify goods which actually contains the risk with no personal opinion and political system. The Quarantine that is only to carry its own duty and no charges should be received and it should act on pre-border and border not post-border. It ensures that the system functions and be prevented.

It is inadequate of sharing pest and diseases between those bodies.

For the current cost-sharing arrangement—we need more detail on it. Where the current cost sharing coming from? Is it from Budget of Commonwealth or the cost sharing from the Quarantine itself by collecting from importer/exporter? It should not be broadened to cover other exotic pests and weeds.

The arrangement for incursion for the environmental impact is unnecessary.

Inspection is not necessarily required. Inspection depends on what sort of products; if goods are well-processed and there is no risk to humans, animals, plant-life and health, then no inspection should be required; such as canned foods.

The current roles and responsibilities of the Commonwealth and the states and territories are not operating effectively enough.

The current legislation framework is very complicated, especially Quarantine Act 1908, which is under Commonwealth control, but it acts as an independent body which has no law in the Commonwealth to override the Quarantine function effectively, under the Quarantine Act of the Commonwealth which have been overpowered by Quarantine using the Quarantine Act. There is no guideline within the Quarantine Act.

The current Quarantine Act is not one body to do the work in Australia and the function has no guideline.

The human health aspect of the act has nothing to do with Quarantine and it should act as a separate issue.

The Commonwealth does need to consider the draft registration framework to override the Quarantine which is inadequate. So far, there are a lot of incorrect decisions implemented by Quarantine on its policy.

The import permit shouldn't be used to restrict a product for a particular reason in Australia. There is no free of pests or diseases.

There are no other models for jurisdiction and it should be implemented.

The division of roles and responsibility between the government, industry and individuals are not appropriate. They are not working well in practice. The only way is revenue rising which is well in practice.

The measurement to ensure their effectiveness is the guideline must be provided well and understandable and not using the body which has limited knowledge and get the benefits out from the Commonwealth body.

Other administrative model could be considered to implement Quarantine and biological policy, shall be open to public and every single Australian has the right to comment not only concerned by some industrial body such as ARCCC. The policy must be clear and public not one person to make a decision e.g. industrial notice from AQIS.

There is some appropriate interaction between Biosecurity Australia, AQIS and the product integrity. They should act as one body under one umbrella, by not using outside body to take as their decision e.g. Lab-testing.

The current approach which Quarantine roll into every division; Quarantine and AQIS should only do their own duty, Biosecurity must run on their guideline.

The quarantine and Biosecurity function be integrated within the Department of Agriculture and must not exist as a separate agency. The reasons is concerning their cost of recovery beyond the government control and flying the government flag, increase the cost of import and export charges as they suppose to do so.

They shouldn't have any regulatory agencies deal with both import and export.

The current decisions making role of the director of animal and plant Quarantine is not appropriate. It should be under control by the Department of Agriculture, fisheries and forestry.

The ultimate decision making power on the risk policy and import permit should be prime minister and minister to get the information from the public, not only the

government body and internal decision. If it is a risk policy, all Australians should be responsible not just Quarantine.

Wider consumers and economic interest should be incorporated into such decisions must address to the whole nation not just internal party; the reason is every single Australian must have a right and responsibility.

Conflict results from AQIS join responsibility of facilitation conflict interest between the industrial bodies.

The regulator should not also be the facilitator.

The resources (is that fund?) should be from the Commonwealth Budget and handled by the Commonwealth not the Quarantine using the cost recovery as their own running fund and call that public money but Quarantine use.

The emphasis on the screen of international area consistent with risk and return is limited. Sufficient development of, and reliance on pre-border intelligence is only when the cargo arrives here Australia.

The arrangement to the cost recovery of aspects of Quarantine and Biosecurity are not appropriately reflected the balance between public interest and private benefits, there is no public interest nor private benefits except the Quarantine itself which the Quarantine Act enriches its own body. There are alternatives which could provide improvement incentives and resources to a better reflect the balance of national interest is the budget provide from the Commonwealth.

The cost-recovery does not have a good impact on the ability on the Quarantine staff to deliver public good outcomes. It only increases the inflation rate, there is no benefit to the whole nation but only creates more burden to the importers, exporters and public individuals. This cost recovery should be abolished.

The cost recovery is not limited to Quarantine, due to the cost recovery, the charges immeasurable. E.g. thirty-three dollars per entry plus fifteen dollars per full container, seven dollars for attention, three dollars seventy per LCL, twenty-seven dollars for document represent, fourteen dollars for shipment from air freight, thirty-five fifty per quarter hour inspection, minimum eighty dollars per one entry, eighty dollars for tail-gate, permit application fee, AQIS approve premises fee, accreditation fee, certification fee, force on training fee, inspection fee (this is unlimited), food inspection fee etc.....

This cost recovery is not minimizing the cost to the importer, it is a great pressure.

So far, the Quarantine is like a private organization and it only concerns about its own benefits.

If want to extend the private facility system, all Quarantine and Biosecurity system must not exist and shouldn't be controlled by Quarantine.

The current import and export certificate arrangement must be flexible.

The requisite skills and discipline are never available to deliver optimal Quarantine and Biosecurity system. No one can ever not make a mistake.

The Australian ALOP (very low but not zero) is not understood in the relevant community.

The mechanism could be adopted to improve communication of this policy setting is simple and understandable.

The Various consultative arrangements are not appropriate with AQIS and not effective.

With the industrial through the consultative committee there is a limit of knowledge which is only take part of the advice and it must concern to the whole nation interest.

Due to this review many of the unnecessary issue has been brought into previous issues which are not relevant to the AQIS and Biosecurity.