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Mr Roger Beale AO
Chairman
Quarantine and Biosecurity Review Panel
Department of Agriculture, Fisheries and Forestry
GPO Box 858
CANBERRA ACT 2601

Dear Mr Beale

On behalf of Melbourne Airport I would like to take the opportunity to make a submission in relation to the Quarantine and Biosecurity Review currently being undertaken by the Quarantine and Biosecurity Review Panel.

In particular I would like to address intervention and resourcing levels as they affect the processing of incoming international passengers at Melbourne Airport.

Melbourne Airport has long had a co-operative working relationship with Australian Quarantine and Inspection Service (AQIS) staff located at the airport, indeed their recent approach to working with their industry partners on the ground has resulted in responsive decision making that has a tangible positive effect for the travelling public. There remain however a number of areas which would benefit from greater policy certainty.

Melbourne Airport appreciates that risk levels are determined through science and evidence based approaches that are intended to protect the Australian environment and citizens from the entry and spread of exotic pests and diseases. To that end, we have always supported and will continue to support the intervention rates determined by AQIS. We would however submit that it is imperative that intervention levels be established with a greater focus on practical probability as opposed to theoretical possibility.

At present the AQIS intervention rate is set at 81%, however the requirement to screen 100% of passengers arriving from countries of increased quarantine risk means that in practice the number of interventions, expressed as a percentage, is significantly higher than the 81% target.

At Melbourne Airport, the current AQIS intervention process is demonstrably the least efficient component of passenger processing and also attracts the highest number of passenger complaints. Intervention rates already consume considerable resources and invariably extend passenger and freight processing times. Target rates that do not accurately reflect quarantine and biosecurity risks serve to exacerbate an already under-

resourced process and further delay the processing of passengers and cargo. AQIS practices which result in stated targets being routinely exceeded have a similar affect.

Intervention rates should be determined following a thorough risk analysis that strikes a balance between resource investment and biosecurity returns. Intervention levels above those determined by AQIS to provide an appropriate level of protection will not necessarily yield results that represent value for investment.

Melbourne Airport submits that whatever the quantum of the AQIS intervention target, those flights attracting a 100% level of intervention should be included when calculating outcomes against that target.

In practise this would mean that those flights in which 100% of passengers are screened would be offset by fewer interventions on flights originating from countries of comparatively lower risk.

It is important that whatever the intervention target and the manner in which it is calculated and measured, that appropriate resourcing is provided to respond to growing passenger numbers and to not only preserve but seek to improve the quality of passenger facilitation at Australian airports.

With the economic benefit of tourism to Australia worth \$38.9billion in the 2006/07 financial year, it is in the collective interest of both the public and private sectors to protect and enhance Australia's attractiveness as a premier tourist destination. First impressions of a country are incredibly important and it is incumbent on all participants operating at the border to balance essential national security objectives with efficient and courteous passenger facilitation.

Continual improvement of operating procedures remains paramount as Tourism Australia's Tourism Forecasting Committee predicts that international travel to Australia will increase by 4.4% from 2007 to 5.94 million visitors in 2008.

In addition to the compliance and enforcement work conducted by AQIS at the border, AQIS should also prioritise the improvement of passenger and trade facilitation through Australia's ports and airports in particular.

Through their payment of the passenger movement charge, travellers are entitled to expect a particular level of service when arriving in Australia. Given the number of government agencies and private sector partners who operate in the arrivals environment, there are great benefits to working cooperatively in developing industry and service level key performance indicators. Melbourne Airport would welcome the opportunity to work with AQIS and other border protection agencies to establish these benchmarks. Such an initiative would clearly articulate the commitment of government and industry to provide flexible and responsive services to arriving international passengers and establish a framework through which tangible outcomes can be delivered.

As a key private sector partner at the border, Melbourne Airport understands that it has a role to play in achieving positive outcomes. To that end, Melbourne Airport will be undertaking significant development works in the coming years to improve passenger experience and to ensure that the first impression that international tourists have of Australia and Melbourne in particular, is welcoming and professional.

We are upgrading our baggage system to minimise disruptions during peak times and to ensure that passengers receive their luggage in a timely fashion post disembarkation. We will also be expanding the number of counters available for passenger processing in the international arrivals hall and extending the size of the hall to create more space for improved passenger flow during peak arrival times.

If appropriately resourced by government agencies and AQIS in particular, this initiative has the capacity to dramatically improve passenger facilitation times whilst maintaining a high level of security and an appropriate level of intervention on targeted routes.

Government agency officials located on airport demonstrate a willingness to be flexible and responsive in dealing with increasing passenger numbers and peak arrival times however without the provision of additional resourcing and a more practical and demonstrable commitment to passenger facilitation as an AQIS priority, neither capital works or goodwill will secure favourable outcomes for Australian trade or tourism.

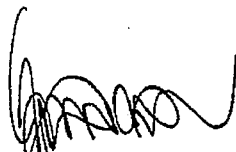
For your consideration please find to follow a number of recommendations emanating from the substance of this submission:

Recommendations:

1. That the present intervention rate of 81% be reconsidered to ensure that it is based on a more practical and strategic assessment of probable risk.
2. That passengers screened on a flight with a 100% intervention level should be included when calculating the 81% general intervention target.
3. That AQIS recognise the importance of timely passenger and cargo facilitation to the state and national economies.
4. That AQIS devise and implement formal practical strategies to improve the timeliness of passenger facilitation at Australian Airports including by increasing the quantum and flexibility of budgets for staff and equipment.
5. That AQIS continue to work collaboratively with aviation partners in improving service levels at Australian Airports.
6. That AQIS work with aviation partners, and airports in particular to develop and industry and service level key performance indicators.

I thank you in advance for taking the time to consider this submission and encourage you to contact Government Relations Manager, Carly Phillips on (03) 9297 1804 should you have any questions.

Yours sincerely



John Nahyna
General Manager Operations