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I, Phillip Widders, am an employee of the Australian Quarantine and Inspection Service, holding the position of Chief Quarantine Officer (Animals) NSW since 1997. Since 2004, I have also held the position of Manager, Scientific and Veterinary Services for AQIS NSW, with responsibility for regional management of the following programs: Live Animal Import, Live Animal Export, Post Entry Animal Quarantine, Post Entry Plant Quarantine, and Operational Science. While my experience in this capacity has formed a significant basis for the following submission, the views expressed here are my own and do not necessarily reflect those of AQIS.

I have framed my submission in response to specific questions raised in the Quarantine and Biosecurity Review Issues Paper.

#### C4. Culture, Efficiency and Resourcing

*Q. To what extent and under what conditions is it appropriate to use private facilities in the quarantine and biosecurity system? Are the current monitoring, auditing and supervision arrangements for public and private quarantine facilities effective?*

##### **Post Arrival Quarantine**

I believe public facilities should be retained for the provision of post arrival quarantine for companion animals and horses. I accept that private facilities have been established and operate for conducting post arrival quarantine for horses (Sandown), laboratory animals, zoo animals and fertile eggs. I am aware that previous reviews have recommended privatisation of horse and companion animal quarantine. Indeed, there is a powerful argument that can be mounted to claim that AQIS should not be managing a kennel/cattery for housing dogs and cats. AQIS can be, and has been, the target of owner complaints regarding failure of provision of adequate care for family pets and valuable show animals. However, a decision between private or government-managed quarantine facilities should be based on the question as to why PAQ is required. A period of PAQ is included in import conditions to permit observation of animals for evidence of clinical signs that may indicate the presence of diseases of quarantine concern. If this period of observation is not required to manage quarantine risks, a PAQ period should not be included in the import conditions. If observation during PAQ is considered necessary, then, in my view, the care of dogs and cats during this period should be provided by AQIS employees. As with family pets, carers who are familiar with an animal's behaviour will be the first to notice signs of ill-health. This is particularly relevant to dogs and cats, as fever will not be a consistent feature of diseases of quarantine concern (in contrast to horses). A veterinary inspection at the start and conclusion of the PAQ period will only identify problems that are manifest at those inspections. While AQIS employees may be no more observant of animals

under their care than privately-employed kennel/cattery attendants, they will have a different imperative with respect to quarantine issues than will private employees. In addition, AQIS will be held accountable for any quarantine failures, regardless of whether PAQ is managed privately or publically. Therefore, if the import conditions continue to mandate a period of post arrival quarantine for the purpose of monitoring the health of dogs and cats post-arrival, I believe it appropriate that sufficient, and well-qualified, animal attendants are employed by AQIS to provide care during this period. If, however, the PAQ period is designed merely to provide sufficient time for AQIS to review health certification accompanying imported animals, I see no reason for PAQ not to be privatised.

If PAQ continues to be managed by AQIS, it is essential that sufficient animal attendants are employed to care for animals in PAQ. Current budgetary constraints too often limit employment of sufficient staff to provide animal-to-attendant ratios that would be expected by owners and the community generally. While RSPCA and private boarding kennels run approximately 35 animals per attendant, ECQS ratios often exceed 60 animals per attendant. Such ratios may compromise animal care, as well as the detection of clinical signs of diseases of quarantine concern. They also contribute to increased stress on staff, leading in turn to high levels of unplanned staff leave, exacerbating the animal-to-attendant ratio.

Similar constraints have restricted employment of AQIS Veterinary Officers. I strongly believe that the veterinary inspections required immediately after arrival and just prior to release from PAQ must be conducted by an AQIS Veterinary Officer rather than by a private veterinarian. It is essential that the scope of these veterinary inspections be defined by consultation between AQIS and Biosecurity Australia, to ensure that relevant quarantine risks are addressed. However, once defined, sufficient Veterinary Officers must be employed by AQIS to complete these inspections within the required timeframe post arrival and pre-release from quarantine.

### **Quarantine Approved Premises**

With respect to Quarantine Approved Premises, I don't believe the current monitoring, auditing and supervision arrangements are sufficient and effective for a range of premise types. For laboratory animal, zoo, insectary, private plant quarantine facilities, and research establishments using imported biologicals in vivo, the regular 6 monthly inspections conducted by QAP officers should be complemented by annual inspections with scientific (entomologist or plant pathologist) or veterinary officers to ensure effective auditing of procedures against relevant quarantine risks. Such inspections have been implemented in the past in NSW, but workload has contributed to their decline in recent years. To this end, it is critical that AQIS employ sufficient, qualified technical experts to contribute to these inspections.

*Q. Are the current import and export certification processes, the auditing of those processes in their application, and the surveillance of their operation, appropriate? Can the administration of import and export certification arrangements be streamlined?*

A significant effort has recently commenced within AQIS to develop and document Standard Operating Procedures (SOPs) and Work Instructions (WIs) to guide all aspects of quarantine and export service delivery. It is critical to the success of this effort, both in terms of the effectiveness of those procedures and their implementation by regional staff, that input from experienced and appropriately qualified staff, from both regional and national office, is canvassed. Equally critical is

that this input from AQIS staff is budgeted for, rather than imposed as an additional impost on already-stretched resources.

Once SOPs and WIs have been developed, regional staff will have responsibility for their implementation. Regional staff should also monitor and review the effectiveness of SOPs and WIs, and it is incumbent upon regional staff to provide comment on effectiveness to the relevant national Program Manager. Ultimate responsibility for the effectiveness of SOPs and WIs, however, must rest with the national Program Manager, who controls both the content of SOPs and WIs and the deployment of resources.

Once procedures have been developed, their implementation, and their effectiveness, must be audited on a regular basis. Auditing of the implementation of SOPs and WIs I believe can and should be conducted by AQIS, either by a dedicated unit within each region or by officers from other regions (including national office). Auditing of the effectiveness of SOPs and WIs, however, should be conducted by an appropriately qualified, independent agency. I believe Biosecurity Australia, as the agency that conducts risk analyses and develops import conditions, should have a critical role in the auditing of SOPs and WIs following their initial implementation, to ensure that the processes that were envisaged by the architects of the conditions are achieving the intended and appropriate risk mitigation. Subsequent audits may be conducted by external agencies, although such audits should ensure that the SOPs and WIs are still appropriate to a changing risk environment. Use of an independent agency (whether BA or external) to conduct such effectiveness audits will accomplish a number of goals, including providing assurance to AQIS as well as the general public that procedures are appropriate and effective.

I believe that current systems within AQIS, particularly IT systems, do not adequately support consistent and effective decision-making by AQIS officers on the ground, nor do they promote efficient use of limited staff resources. The current focus within AQIS on development of SOPs and WIs should go a long way to address those deficiencies. However, regional officers will continue to receive directions and advice by a range of channels, and unless such information can be marshalled for future recall and use, it is possible that out-of-date information will be relied upon by regional officers. This is particularly relevant for regional Animal Programs staff, who may provide services across Live Animal Export, Live Animal Import and Post Entry Animal Quarantine Programs, involving a range of animal species and commodities including companion animals, livestock, horses, genetic material and fertile eggs. The availability of effective, accurate and accessible systems that record current advice/directions would greatly enhance efficiency, consistency of decision-making, and reduce the risk of mistakes occurring.

On a related theme, available systems are often inflexible or not effectively integrated to support optimum efficiency. For example, management of the import and quarantine of a dog or cat involves at present four separate IT applications, with the prospect of a fifth system under review. These systems include the permit issuing system, the kennel management system, the invoicing system, and the payment receival system. A booking system for quarantine space has been proposed for some time but not yet developed. Integration amongst these systems is limited, often resulting in multiple data entry. Additional systems are regularly used: the AQIS Intranet for accessing Work Instructions, and spreadsheets to record details of animals on quarantine hold. The inflexibility of some of the IT systems contribute to inefficiency: for example, the inability to perform a simple sort function on data reports results in Veterinary Officers sorting manually through hard copy lists of more than 100 animals to manage the PAQ veterinary inspections.

The current process for import of companion animals (particularly dogs) is inefficient and as a result generates significant workload for regional AQIS officers and considerable angst for importers. Between 5% and 10% of companion animals (mostly dogs) imported to ECQS have documentation discrepancies that are revealed during PAQ. Resolution of these discrepancies, based on enquiries to overseas authorities, or retesting and occasionally treatment of animals during PAQ, consumes significant AQIS staff time and causes distress and additional cost to owners. Where issues cannot be resolved, some animals have been exported or, rarely, euthanased. The impact on AQIS of many of these problems, and distress to owners, could be avoided, or at least minimised, by requiring that Health Certificates must be pre-cleared by AQIS before animals can be accepted by airlines for carriage to Australia. Such pre-clearance may be based on electronic or FAX submission of Health Certificates once they have been completed overseas, with verification of the original Health Certificate on arrival in Australia. While staffing structures may have to be re-arranged to ensure pre-clearance can be effected within an appropriate timeframe, significant benefits will accrue from implementing such a process for companion animal imports.

Export certification processes for live animal exports (including exports of genetic material) are not consistent across all AQIS regions. Most offices rely on a database designed over 10 years ago for generation of Export Permits and official Health Certificates. This database is managed separately in each regional office. There is no national integration of this process, and an attempt in recent years to standardise this function was shelved due to cost. As a result, Health Certificates issued for the same commodity destined for the same market may have a different look depending on which regional office issued the certificate. A national system would support the production of consistent documentation, as well as maintaining centrally-accessible records for export consignments. This would allow greater oversight of the program as a whole and more efficient use of regional staff.

Integration of information for issuing documentation for exports of live animals, particularly livestock, could also be enhanced. There may be 3 or more separate sets of legislation/regulations that relate to export of livestock (Export Control Act and Orders, Australian Meat and Livestock Industry Act and Orders/Regulations, and Australian Maritime Safety Authority Regulations). In order to ensure that all relevant regulations are addressed for individual export consignments, it would be extremely useful for officers issuing the Export Permit and official Health Certificate to be provided with a single reference document that integrated all relevant regulations, conditions and risks that must be addressed before such documentation is issued. The current Consignment Risk Management Plan would be an appropriate focus for such integration, but its current format doesn't address all the above items.

*Q. Are the requisite skills and disciplines available to deliver optimal quarantine and biosecurity systems? If not, what are the highest priority areas? Is the education and training of personnel with these skills adequate? If not, what are the highest priority areas?*

The contribution of scientific staff (entomologists and plant pathologists), in training and supporting the Quarantine inspectorate through provision of diagnostic services and technical advice, is greatly valued by regional staff and regional program managers. For too long, however, the regional OSP staff have had trouble in keeping up with the workload. The significant increase in recruitment of Quarantine Officers as part of the Increased Quarantine Intervention was not matched by an increase in recruitment of scientific staff in the Operational Science Program (OSP). This was despite the

increase in training load, diagnostic samples and requests for advice that followed the increase in inspection capacity and intervention rates in line with the growth in size of the Quarantine Inspectorate. While recruitment of scientists within the OSP program is currently limited by budgetary constraints, the limited availability in Australia of suitably qualified scientists (taxonomic entomologists and plant pathologists) should also be a cause for concern for succession planning within AQIS. This dearth of expertise in turn drives salary levels, which may lead to AQIS becoming uncompetitive in attracting suitably qualified individuals. I believe a significant increase in regional OSP staff numbers is warranted, to support effective decision-making based on scientific advice and testing in the regions.

It is important also to ensure that an appropriate career structure exists within AQIS regional offices for scientific staff. This applies equally to veterinary staff. Although such staff are recruited largely on the basis of technical skill, their role within AQIS in providing advice and services to a range of programs provides them with an unique insight to regional operations that should be tapped by AQIS Regional Management, by providing scientific and veterinary staff with management opportunities.

I believe significant opportunities exist for AQIS to establish formal links with Universities to support development of relevant scientific skills for the future. Such links could also support development or adaptation of improved diagnostic techniques that will improve the detection of pests and diseases of quarantine concern. The volume of material that passes through AQIS's control represents a wealth of opportunity that, if effectively harnessed through links with Universities, could support research with significant benefits for AQIS and the Australian community. Such links, if effectively negotiated with Universities and industry, could be a huge benefit to AQIS, by assisting in development of future staff and enhancing import protocols, at minimal cost to AQIS.

## C5. Communication and Consultation

*Q. Are the various industry consultative arrangements with AQIS appropriate and effective?*

To be optimally effective, I believe that industry consultative forums should include representation from both national and regional AQIS offices. This will promote effective communication amongst all relevant sectors, and will support engagement of regional staff for delivery of a consistent and unified AQIS agenda.

Communication and consultation between AQIS Regional Offices and State Departments of Agriculture/Primary Industries could also be enhanced, to support more effective interaction for export and inspection services, as well as investigation of post-border breaches.

I would be happy to discuss the content of this submission in more detail with the review panel.

Yours sincerely

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