

Quarantine Review Submission

Revitalising confidence in AQIS and BA.

By Gary Orr, Rural Conservation Service/Mount Yaven Alpacas

Background information

Qualifications

Diploma of Applied Science (Agriculture) Wagga Agricultural College 1975, 1976, 1977

Certificate of Agriculture. Yanco Agricultural College 1974

Stage 1 Woolclassing. Stage 1 Meat Inspection 1974

Quarantine Experience

1980 to 1990 Authorised Quarantine Officer (AQIS)

1992 to 2003 Authorised Quarantine Officer (CSIRO)

2003 to 2004 CSIRO Quarantine Manager (Quarantine Authorisation revoked 24/2/2003)

Nominated for Quarantine award 1999 (group award), 2000 (individual award).

Other experience

1990 to present Director Rural Conservation Service. Seed collection, tree planting and direct seeding. Biosecurity advisor and lobbyist.

1999 to present. Owner/Manager Mount Yaven Alpaca Stud, Adelong.

Founding member Wildcare Inc. (Rescue, rehabilitation and release of native animals).

Quarantine Lobbying 2004 to present

- Various correspondences (verbal and written) to AQIS management regarding inspection errors and detrimental effects to CSIRO research of poor inspection standards.
- Various letters to Ministers of Agriculture, Fisheries and Forestry. Warren Truss and Peter McGuaran. (Warning of imminent pest and disease incursion)
- Letter to Bill Heffernan
- Letters to editor of The Land, Tumut and Adelong Times and the Weekly Times
- Emails to AQIS Public Relations manager (regarding false information to public).

The main subjects of my lobbying included;

- warnings of pest and disease incursion through poor AQIS service/inspection standards,
- lack of accountability and transparency
- unnecessary changes to Section 9AA of Quarantine Act,
- revocation of CSIRO Quarantine staff authorisations and resultant increased risks, costs and dismantling of a practical shared responsibility and safe import system,
- poor science application,
- inefficiency leading to unnecessary costs,
- misleading and inaccurate statements by senior AQIS/BA management,
- inspection over-servicing e.g. quarantine approved premises (QAPs),
- lack of experience and appropriate qualifications of front line inspectors,
- poor communications and inadequate AQIS documentation.
- request for an independent public review of AQIS,
- request for independent third party auditing of all AQIS work by industry representatives e.g. horse industry audit horse industry inspections and import procedures,

C1 Risk

The current quarantine/biosecurity system is not appropriate to maintain Australian biosecurity at an ALOP. Changes need to occur. Since the introduction of the Nairn Review recommendations and “increased quarantine intervention” (IQI), incursions in Australia have increased. Maybe it is a case of quantity over quality. In many cases it is AQIS staff and management that have increased the risk to Australian agriculture and the environment.

Many IQI inspectors do not have appropriate qualifications/experience. It would seem that AQIS management prefers these people over fully qualified and experienced staff to do a given job. AQIS charges on a fee for service basis and the time taken to complete a job is used to charge importers. An unqualified/inexperienced person takes much longer to do a given job than a qualified/experienced person. AQIS has the monopoly on quarantine inspection and regulation irrespective of compliance agreements. It is my experience that on many occasions a job that could be completed in a very short time could take hours or days to complete. Low risk items can take as long or longer to complete as high risk items. Many new quarantine officers have the ability to waste other biosecurity professional’s time and take them away from high risk items. As a senior AQIS officer (name withheld) once said “if we hire monkeys we only have to feed them peanuts”. So AQIS management has decided that they can hire more people if they are not fully qualified because wages can be lowered. At the same time the inspection costs and therefore revenue is increased.

The employment of new quarantine officers is carried out by external employment agencies. They place people in jobs and get their funding irrespective of the persons ability or capacity. The staff these employment agencies hire on behalf of AQIS should be thoroughly screened for ability and capacity by professional biosecurity persons.

Recent job advertisements for quarantine staff in NSW simply state qualifications/experience in agriculture, horticulture etc as “desirable”. Qualifications and experience are not essential requirements as it has been in the past. In NSW we have AQIS front line officers from diverse backgrounds including modeling, electrical, plumbing, security, airport trolley collection, check out operators, retail staff. Furthermore, no senior NSW staff have any qualifications or extensive experience in applied science or people management or agricultural/environmental protection.

AQIS jobs are listed on the AQIS web site but employment companies only advertise quarantine jobs in city newspapers. AQIS inspection jobs should be advertised in country newspapers to give people with experience with plants and animals a fair chance of viewing the vacancies. There are too many city based persons taking jobs that have a huge affect on country people. Country people understand the ramifications of pest and disease incursion and would do a better job in biosecurity than their city cousins particularly if AQIS continues to hire inexperienced or unqualified personnel.

The current system of recruitment has created two types of officer; those officers with adequate qualifications and experience to maintain an ALOP and those without the required knowledge. However, I accept some IQI staff without qualifications and experience have the capacity to do a good job and are competent.

Some staff have brought AQIS into disrepute including those that have been sacked for misuse of official equipment. Some have increased the risk of incursion and some plainly should be sacked for incompetence. People with less than one year experience in AQIS carry out inspections of imported research items, some high risk items. These items were once only inspected by

professional biosecurity staff. AQIS has lost the respect of many Australian scientific institutions such as universities because it is so obvious the non-professional AQIS staff do not understand the materials they are suppose to have under control.

The AQIS manages for consistency they have difficulty attaining and this idea should be adjusted. There will never be consistency while AQIS has two types of inspector. Those with expertise and those without qualifications and experience will never be consistent in their work practices. Different states also do the job in differing ways. Inconsistency is human nature and AQIS management would be better focusing on the job rather than consistency. AQIS officers are different and have different views and interpretations of the Import Conditions database (ICON), work instructions, standard operation procedures, Quarantine Act and all the documentation (some unnecessary) that these people must be familiar with.

Senior AQIS administrators and the previous government have opted for quantity over quality. I have received many parcels that require thorough inspection, including herbarium specimens, with inspection charges up to \$160 per box and yet the box has never been opened. Senior AQIS officers (names withheld) have said to me, “do a quick and dirty”, “you cannot trust CSIRO” and in regard to a specific question on changes to Section 9AA of the Quarantine Act a senior AQIS officer (now working for Biosecurity Australia) stated “I do not know the rhyme and verse”. Other derogatory quotations withheld. One senior AQIS officer in regard to widespread spillage of untreated African soil, live plants and weed seeds between Canberra and Perth using the private courier DHL stated “it is not our responsibility to ensure security on freight; it is their (DHL) responsibility”. Of course had AQIS done its job properly they would have supervised repackaging of this high risk job after they cut through all the highly secure packaging. The parcel should have been irradiated prior to inspection but the AQIS officers involved chose to ignore my requests to do this. We went to so much trouble to ensure the high risk contents arrived to Australia safely and yet amateur AQIS officers with the blessing of head office staff made the parcel very insecure as it traveled across Australia.

The issues paper asks about the Eminent Scientists Group (ESG). The role of the Eminent Scientist group is not well understood by the general public or stakeholders. These people are extremely competent scientists and very busy people and I doubt whether they really have the time and resources to thoroughly scrutinize the import risk analysis process or the background science. Their role is one of perception that Biosecurity Australia’s (BA) Import Risk Analysis processes are thoroughly and scientifically scrutinized.

Real scientific analysis requires peer group scrutiny and any scientific revelation should be published and any scientific statement/opinion should be referenced. The IRA process and outcomes needs to be properly scrutinized by specialist independent scientists.

There should be more accountability, responsibility and transparency of AQIS and BA officers. The recent Equine Influenza Inquiry proves that AQIS and BA processes are flawed and requires an overhaul of all systems and staffing, not just systems affecting horse importation. A number of senior AQIS and BA officers have contributed to the import of that disease as the inquiry transcripts indicate. It seems that some of those people have now been promoted or moved sideways. Those people should be either sacked or jailed not promoted. Where is the accountability? Those people have cost Australians millions of dollars, particularly in rural communities. The incursion could have been prevented had AQIS, BA or the previous government taken account of my previous timely warnings of imminent incursion or those of the Horse Industry.

AQIS staff and inspection processes should be subject to independent random auditing. AQIS bureaucrats hide behind their powers, public relations propaganda and within the unaccountable bureaucracy. They cover up mistakes, corruption and use propaganda to give the public the impression they all do a good job. They would not stand up to any real independent scrutiny. The rural public has lost confidence in AQIS and BA. All AQIS staff, from the Director to the newest officer should be open to scrutiny. I challenge AQIS and their staff to be open to audit by independent third party audit. A proper independent audit process would help AQIS meet its documented service standards and reduce risk to Australian agriculture and the environment.

Furthermore, agricultural industries are required to contribute to the cost of incursion and they should be given a more practical hands-on role in the prevention of exotic pest or disease incursion. Independent auditors should be external to AQIS and BA. They should be given robust legal quarantine powers with appropriate safeguards. They should have a stake in the industries that are adversely affected by incorrect and bad decisions and actions by AQIS and BA.

C2 Legislative framework

The re-writing of Section 9AA of the Quarantine Act (appointment of officers responsible for animal and plant quarantine) around 2003 was not necessary. Prior to the re-writing of the Section, part 3, basically stated “The Director may appoint a person to be either or both a quarantine officer (animals) or (plants)”. Of course the Director would only appoint people requiring such appointment, e.g AQIS officers, CSIRO Quarantine personnel, and could revoke any such appointment at any time if it was not in the national interest.

The previous appointment process meant that in an emergency situation e.g. an Equine Influenza outbreak the Director could appoint the security guard stationed on the gate at the Eastern Creek as a Quarantine Officer under the Act. The re-written Section 9 meant that not only was the security guard on duty but also an authorised AQIS officer had to be stationed with him. This simply meant that two persons had to be on guard at the Station gate.

The re-written section now only allows quarantine authorisation of Police Officers, State Officers, Commonwealth Protection Officers and Officers subject to the Commonwealth Public Service Act and persons in prescribed organisations that are under Commonwealth authority. So it would seem that the State government tea lady or bus driver could be appointed but any staff from the CSIRO Quarantine Unit or The Australian Animal Health Laboratory or for that matter many other competent experts in exotic pest or disease regulation and control would not be allowed to be appointed as an authorised quarantine officer.

Any person with common sense or scientific background would think that the previous Section 9AA that served well for Australia’s past quarantine needs would also serve well for present and future biosecurity needs. It is my view that specific AQIS officers through their ignorance and bias deliberately had this Section amended to deliberately exclude CSIRO Quarantine officers from authorisation and also prevent them from authority in the future, unless that organisation was prescribed. The people responsible for the amendment have now moved into other jobs outside AQIS having done a great disservice to Australia’s research capacity, to Australian’s generally and to AQIS staff.

The staff at CSIRO Quarantine Unit were authorised under the Act prior to this unnecessary amendment for about forty plus years. No weed, pest or disease incursion was ever recorded as a

result of imported goods handled by these authorised people and yet the whole of modern agriculture in Australia was based on imports these people handled from 1929 until 1988. The authorisations of CSIRO Quarantine staff were revoked by the AQIS Director in 2003 following the re-writing of Section 9AA.

The Quarantine Unit was responsible for the importation of all crop and pasture plants into Australia until 1988. After that time genetic resource centres took on the role of germplasm import. Agriculture in Australia would not have been modernised to the same degree as it is today without the CSIRO Quarantine Unit (formerly known as the Plant Introduction and Quarantine Unit). After 1988 the Unit performed Quarantine on most Commonwealth scientific imports for all CSIRO Divisions across Australia under the direct supervision of AQIS personnel. This meant most of these imports were brought into a centralized centre, were thoroughly scrutinized, inspected, and all requirements including documentation, treatments, post entry work etc were met and it was easy for AQIS to monitor these imports.

The imports were handled by highly experienced and qualified personnel. The cost of Australian research to Australian taxpayers was reduced and Australian research had a chance to compete with the powerhouses of research in Europe, USA and Japan.

When the authorisations were revoked the costs of CSIRO imports dramatically increased. That is a direct cost to the Australian taxpayer and prevents Australia to a degree to compete scientifically with other modern countries. Instead of goods being imported through one centralized Unit imported goods were brought in all over the country and goods were inspected and dealt with by a range of AQIS officers. Many articles were not handled properly and goods went missing and were damaged. Packaging on some high risk items were made insecure by amateur AQIS officers. The CSIRO Quarantine staff were constantly taken away from high risk items and duties and were constantly spending time on low risk items such as DNA being “quarantined” for trivial reasons such as addressed to a PO Box rather than the Street address.

After revocation of authorisations up to 50% of all goods subject to quarantine were missed by AQIS officers contrary to the public assertions of 100% inspections. This simply created even more work for the CSIRO staff. To add insult to injury AQIS would often levy their charges on items they missed once CSIRO reported the missed parcels.

Goods were and are still inspected by inspectors with little experience and with no idea of what they are handling or what they are looking for. Many AQIS officers would seize flour samples imported by the Grain Quality Research Laboratory because it looked like the white powder made famous by American anthrax scares. Inspection of herbarium specimens were, and without doubt are still, not handled correctly. AQIS officers treat herbarium specimens like they were hot potatoes. The items are passed from inspector to inspector until they end up with AQIS nursery stock people whom have little time to inspect them correctly but always find time to charge for inspections not done properly. Many herbarium specimen imports are not inspected at all and yet they receive an inspection charge and regardless of the compliance agreement now in place. AQIS has lost the respect of Australian scientists who could see that authorised amateurs were carrying out quarantine on their imports and yet had to pay much higher costs.

This re-writing of the Section 9AA did no-one any favours. It created more work for NSW AQIS staff that were already overwhelmed by general imported goods. It increased costs, it reduced research competition, it increased the risks associated with research materials and it took CSIRO Quarantine staff away from important high risk areas such as post- entry quarantine and onto trivial or financial issues.

The documentation of goods is appalling. Lazy AQIS officers often write CSIRO on AIMS entries meaning that AQIS revenue collectors were always asking the Quarantine Unit for money even though the goods were no longer handled by the Unit. Goods imported through South Australia were often charged to CSIRO in Canberra. The same thing happened at all large research organisations such as universities.

So in essence while AQIS and others talk about “shared responsibility” this re-writing of Section 9AA meant CSIRO quarantine responsibilities were removed and they basically became revenue collectors for AQIS. After one year of this intolerable situation I resigned from my job as the Manager of the CSIRO Quarantine Unit. I was no longer prepared to simply be an AQIS revenue collector. I could no longer accept all the mistakes made by AQIS staff and I no longer wanted AQIS staff in Sydney with little or no experience to waste my time. AQIS prevented me from contributing to practical Australian biosecurity after a 22 year career in agricultural protection. A profession I deliberately chose to follow unlike many officers in AQIS.

It seems that AQIS revenue collection is a higher priority than biosecurity because to this day the only positive about the re-writing of the Section is that AQIS has increased its revenue from CSIRO.

I call on the review panel to recommend to the current government that either Section 9AA be amended back to the former wording and authorise the CSIRO staff OR prescribe CSIRO under the section and authorise the Quarantine staff at the CSIRO Quarantine Unit. The Unit could still work under a Compliance agreement in order to restrict their role to that of CSIRO Quarantine

The staff at the CSIRO Quarantine Unit have always done a better job of biosecurity than AQISs own officers. They can do it for half the cost. They can document imports in a meaningful way for trace back purposes and they have access to Australian experts in every field of pests, weeds and diseases. AQIS holds the monopoly on import biosecurity and everyone knows monopolies are inefficient. That inefficiency increases pest and disease risk

Compliance agreements

How many have worked in Australia? I know the CSIRO one has worked but also know that AQIS has had trouble with other CA's working effectively. The CA at CSIRO Quarantine Unit once again takes away responsibility from the quarantine staff and hands it to CSIRO PI management. CA's are used by AQIS as another way to levy more fees and conveniently add even more red tape and useless bureaucracy to the job. There needs to be a genuine shared responsibility.

C3. Jurisdictional and institutional arrangements

The Australian Capital Territory (ACT) was placed under the jurisdiction and management of NSW around 2002/2003. The ACT however enjoyed an equal say in quarantine matters since 1908 without any problem. Successive senior inspectors (now called Regional Managers) within the ACT were able to contribute to national planning and policy on a wide range of quarantine matters. They were also able to directly inform national management about quarantine issues both by formal methods and informal methods particularly regarding diplomatic matters and CSIRO research.

The loss of jurisdictional autonomy has resulted in a number of problems for AQIS clients within the ACT. The NSW management is unable to view quarantine matters from an ACT perspective

as you would expect. The ACT AQIS staff are able to provide a better service than their NSW counterparts because of the size of the jurisdiction. They also provide a service closer to the AQIS service standards than the NSW officers. NSW officers have a different perspective to that of the ACT and because they are always too busy to provide a better service this affects the ACT AQIS clientele. For example goods being held by NSW staff present difficulties for ACT AQIS clients because they have to ring around to various NSW staff that delay processing, increase costs and further erode confidence in AQIS generally. ACT imports should be handled totally by ACT staff.

Many ACT clients feel they have to go through two sets of AQIS processing. In my experience ACT people were always ready and able to help with ACT problems however NSW representatives were never able to provide the same high standard. As far as consistency is concerned the ACT staff had to lower their standards in order to be consistent with NSW.

Furthermore, the NSW senior management quite obviously displayed clear bias towards the ACT management and ACT clients. Many decisions have been made by NSW directly to thwart progress and efficiency within the ACT. If NSW had been managed as well and as precisely as the ACT was managed in the past, with particular attention paid to security, documentation and surveillance, then EI would not have entered Australia.

Why was this decision made by AQIS management? Most people know that the main reason was to muzzle the former ACT Regional Manager. It worked. ACT was unable to contribute to National management issues through regional manager meetings. Any ACT problems are hand-balled to NSW and a solution is rarely found.

The ACT should be allowed to be managed directly by an ACT Regional Manager without having to kowtow to NSW. The practice of sending staff from NSW to ACT for routine jobs such as CA auditing, QAP inspections, airport inspections adds to cost to quarantine functions and is unnecessary and inefficient.

Other issues regarding institutional arrangements.

The separation of AQIS and BA was done for the wrong reasons; namely to give the impression to the public BA was independent and made decisions based on good science. The decision was doomed to failure particularly since BA is run by an administrator instead of a scientist. Communication has become very poor between the two organisations. The separation of the organisations has been used by both AQIS officials and BA officials to “pass the buck” and frustrate clients looking for honest answers and solutions to their quarantine problems.

The BA executive administrator simply transferred from AQIS to BA probably because of higher wages and less pressures. The EI inquiry has shown lack of communication between the two organisations under his questionable leadership. BA should be run by a scientist if it is to be a trusted scientific authority. The administrator should be subordinate to the Chief BA scientist and keep to simple administrative matters. Who is the government kidding by saying they are independent. Just be realistic. The two organisations should be working closely together. In the past the people making policy also provided operational management so most procedures, working instructions etc were executed in a seamless way. Therefore, the two main biosecurity organisations and possibly other similar groups within DAFF should be reunited under the same over-arching biosecurity organisation.

C4. Culture, efficiency and resourcing

In my view there have been many abuses of power and decisions are often made for the wrong reasons usually ignorance or bias. AQIS and BA are not, in my view, transparent and accountable as we often hear by their public relations people. They should be made accountable and all decisions should be transparent. Decisions should be made for good reason, documented and in the National interest within an ALOP. In this submission I have highlighted some of the decisions made through individual bias and ignorance and for reasons that leave questions about competence and concern for the national interest.

AQIS is a government monopoly. Monopolies are by nature inefficient. Monopolies are able to charge high rates for their inefficient services but if competition was allowed then few people would want the inefficient organisation to carry out work on their imported material. Compliance agreements and shared responsibilities was a good idea in theory but AQIS management has not been genuine in their execution. How many CA's have worked? Not many. Have the CA's simply added another tier of useless bureaucracy on organisations? Yes. Has AQIS staff used the CA system to enhance genuine sharing of responsibility or have they been used to extract even more revenue from clients to pay for their inefficient methods. Given that recently Sydney inspectors had to drive to Canberra to audit CA's one would think that this is just another way for AQIS staff to have a junket and increase the costs to importers and taxpayers.

AQIS and some of its staff have never embraced "shared responsibility". Misguided officers think they have the monopoly on caring for this country.

How efficient and honest are some of AQIS's practices? A sample of wheat grain was found to contain live insects. It took 3 months for AQIS to have the goods treated. When questioned about this I was firstly told they do not have the goods anymore, "Fedex has them". Fedex said they didn't and that AQIS has them. I rang AQIS back and they got very angry about me bothering them. I rang the fumigators whom stated AQIS has the goods. Finally AQIS found the goods in their possession and then said they would not release them because we had not paid the fumigators. I checked that assertion and found the fumigators were paid within seven days of them receiving the goods three months earlier. I questioned why AQIS was acting like a debt collector for the fumigators when obviously there was not only a conflict of interest doing that but it was not written in law that they should do it. This looked like corrupt behaviour and AQIS officers should not be seen to be acting on behalf of fumigators that reap millions of dollars in income from AQIS decisions. Finally I received the wheat samples and no dead insects or any evidence of insect activity was found. Upon contacting a senior NSW AQIS officer about this unprofessional and suspect behaviour I was told "thank you for your inquiry" and that was it. These incidences make clients question AQIS integrity and professionalism.

Staff at the CSIRO Quarantine Unit can provide quarantine services at a much higher level of security, consistency and at one half to a third of the cost as AQIS. Yet decisions made by senior AQIS management seem to favour inefficiency and less security putting their own job security and revenue streams ahead of the National interest. Anyone with a different approach or anyone whom questions some of the decisions made by AQIS management or some AQIS staff is reprimanded and circumstances changed to stamp out contrary views to their own even if it is not in the national interest. This is why previous AQIS management, now in elevated positions outside AQIS but still in the Department, did the following against all sense.

- Revoke quarantine authority of dedicated and experienced quarantine officers
- Made unnecessary changes to Section9AA of the Quarantine Act
- Removed ACT input into National quarantine affairs

- Make excuses for poor biosecurity
- Unwilling to bring import conditions up-to-date
- Make ad hoc decisions about import conditions
- Focus on revenue collection

C5. Communication and consultation

AQIS staff do not consult fairly. Their communication with clients and stakeholders is poor. In relation to the changing of Section 9AA the consultation process was simply a formality. They deliberately misinformed CSIRO about changes to Section 9AA and did not give CSIRO a fair chance to contest the changes because of their misinformation. When asked about Section 9AA the main senior AQIS person pushing the changes said “I don’t know the rhyme and verse” and you cannot be authorised because CSIRO is not subject to the Public Service Act. When the changes took place a senior officer said it was to be carried out with as little disruption as possible. There was much disruption and no-one actually helped to reduce disruption. Actions speak louder than words.

Unqualified/inexperienced officers are not able to communicate effectively to qualified officers or to scientists or qualified biosecurity professionals. Often AQIS officers would seek my guidance on many imported items and their import conditions. Communication to the general public is also poor. Often people are just told to visit the AQIS web site for information. The web site is extremely well presented and has all the information required. However it is often better to simply provide the information required in the first instance.

C6. Research

Many quarantine requirements have evolved from past years when AQIS (under a former name) ran the Plant Quarantine Research Station at Weston, ACT. Back then AQIS staff were directly involved in quarantine research, the staff were scientific not administrative and the policies were based on practical experiment. Much is said about quarantine being based on good sound science. Yet today the “science” is not properly published or referenced. AQIS staff often adds new conditions to import procedures in an ad hoc way. This creates problems for both AQIS clients and AQIS staff. Import permits end up with many conditions that are unnecessary and excessive to attain an ALOP.

Some of the science used by AQIS is out-dated. For example we were able to show AQIS that seed treatments for Barley seed actually killed imported barley seed out right. After much waste of our time they eventually changed the import conditions for all cereal seed. During the process of proving to AQIS their treatment was outdated I spoke to the Plant Pathologist that initially formulated the quarantine treatment. Basically the hot water treatment was lifted from old scientific text during 1970/80s. The text stated that the hardest disease to kill was *Ustilago nuda* but it could be killed by hot water treatment at around 42degC. The seed treatment was formulated by simply adding another 10degC to the treatment and includes a pre-soaking. This is not a very scientific way to approach quarantine import requirements. After that AQIS officers allowed the use of seed fungicides. The fungicide (BaytanC) was only available in large (and expensive) quantities and many importers purchased the material to use on their imported seed. Then AQIS, apparently because BA instructed them, decided to change the seed treatment fungicide and stopped the use of the former fungicide even though the former material was rigorously tested for efficacy by the Australian Pesticide and Veterinary Medicines Authority. AQIS and BA ignored that authority’s rigorous chemical registration process and an individual

decided that it was a good idea to use another chemical. This is not good science. The process simply showed AQIS and BA made some rules in an ad hoc way and in many instances decisions were more about revenue collection and complicating the import of material.

All quarantine conditions and treatments should be referenced so anyone can be absolutely confident of the science. There are too many changes made without reference and scrutiny and this does not instill confidence in people particularly if the people concerned change rules and write import conditions based on ignorance or bias.

Other instances show the science is questionable and often based on revenue collection rather than good biosecurity. E.g. DNA is a very low risk item even if imported in laboratory strains of E coli. The imported material is always destroyed in the laboratory. Laboratory strains of E coli are non-pathogenic. Advanced laboratory practices are not taken into account. DNA is immensely important to modern research and huge quantities are imported. Import rules for the material reflect AQIS's reluctance to lose revenue and BA's inability to provide AQIS with scrutinized sound science. A person walking through Sydney airport has millions of bits of DNA on themselves and their clothing but if you bring in one eppendorf tube of purified DNA some AQIS officers treat it like FMD. The cost to Australia of inappropriate import conditions based on questionable science is huge in relation to DNA imports.

Herbarium specimen import conditions have been re-written many times by both AQIS and BA officers. The rules are obviously written by people that have not had any experience with the inspection and other biosecurity arrangements of herbarium specimens or Australian herbariums. Once again the rules seem to be more about revenue than good science or reflection of risk.

Australia is losing ground in scientific research because import conditions do not necessarily reflect risk. One shipment of DNA imported by post was placed under quarantine because it was addressed to a PO Box instead of street address.

There are many examples on the import conditions database that do not reflect good science. The conditions reflect revenue collection, inefficiency, lack of understanding of the material at hand by both the policy makers and some operational staff.

C7. Review

AQIS and BA should be continually reviewed by independent auditors to ensure they meet their documented service charter and perform their functions to the highest possible level. It is important the people carrying out reviews and audits are independent as internal audits by AQIS staff are grossly flawed as the EI Inquiry discovered and AQIS clients already knew. Internal audits by AQIS staff have been a complete waste of time and effort as they simply check the boxes on documentation and get filed away with nothing achieved. Had meaningful independent audits been carried out on the Eastern Creek Quarantine Station, the horse importation process and those AQIS staff involved then the glaring problems would have been identified. Once identified AQIS would be bound to correct the shortcomings. The same process would have reduced or prevented all the pest and disease incursions Australia has encountered over the past ten years.

AQIS clients are unable to criticize AQIS or complain about their methods because of repercussions that could result to their business or operations. I have had first hand experience of individuals in AQIS abusing their powers even when the criticism is constructive. This is further reason that independent reviews should be carried out.

Major reviews such as the one currently being undertaken should be carried out roughly every 6 to 8 years. They should be part of the over-all system and not be necessarily instigated through political convenience or after major incursions.

A review system as outlined briefly above would help AQIS improve the (rural) public's stagnating confidence in this important organisation.

Recommendations for a better service and to regain public confidence in AQIS and BA

Section 9AA of the Quarantine Act should be re-written to previous wording and authorise specific CSIRO biosecurity professionals.

Unqualified people should have a ceiling on their advancement in AQIS unless they are prepared to do further studies in a field of biology.

An elite squad of highly qualified and experienced inspectors should be formed to attack new incursions in timely and effective manner. Practical arguments for this have not been put forward in this submission due to time constraints. The practice of inexperienced/unqualified people attending outbreaks should stop e.g. a qualified lab assistant dealt with WSMV at CSIRO.

All AQIS officers from Director to lowest inspector should be subject to random auditing by independent third party auditors. Senior decision makers in AQIS and BA should have some of their decisions vetted by independent persons to ensure their decisions are in the national interest.

AQIS should be made legally responsible for incursions that cost millions of dollars when it is found they contributed to the incursion. If industry has to foot the bill for incursions then industry should become part of the prevention process e.g. audit role.

Quarantine should be applied in a scientific manner by people that understand biosecurity science. Unqualified/inexperienced people should remain in administrative roles.

Documentation should be improved for tracking purposes and made to reduce costs to clients. Specific importers name should be on AIMS documentation not just the name of the importing organisation as is often the case for large organisations. End lazy documentation.

Science underpinning quarantine rules should be open and transparent. All import conditions should be referenced.

Thank you for giving me the opportunity to contribute to this review to improve Australian biosecurity. I have comments for all the questions presented in the issues paper. However as I provide full time care for my 21 month old twins and manage a rural business (dependent on absolute quality quarantine services) I have ran out of time. I am available to the panel for questioning if required.