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3 June 2008

Secretariat  
Quarantine and Biosecurity Review  
GPO Box 858  
Canberra ACT 2601

Dear Sir/Madam

As a veterinarian with a long professional interest in the health of Australia's livestock and as a previous Chief Quarantine Officer (Animals) for South Australia, (an appointment associated with my position as Chief Veterinary Officer under the then system of state based input into quarantine management), I have been increasingly concerned over the continuing deterioration in both public and professional support for the broad activities encompassed by the quarantine function.

These concerns have been strengthened as result of my experience of the response to the 2007 incursion of equine influenza (EI) and its aftermath, where I have been engaged on a number of projects including an examination of the efficiency of the response, membership of a panel that examined future response arrangements and the preparation of a report reviewing the response from a national perspective. These tasks have provided numerous opportunities to examine information arising from the Commission of Inquiry into the EI outbreak and discuss the basis for the escape of the EI virus from quarantine with a wide range of colleagues.

Because this submission is made after the closure of the formal consultation period, comment is restricted to Item 4 viz, "governance and institutional arrangements to deliver biosecurity, quarantine and export certification services". I believe that the current organisational arrangements are at the core of concerns over current performance.

## **Governance and institutional arrangements**

In my view there are two primary issues that affect the ability to deliver the professional level of quarantine and biosecurity services appropriate to Australia's position as first world country with relatively disease free plant and animal industries.

The first of these is the organisational arrangement that separates quarantine operational delivery and biosecurity policy development. This has meant that despite some effort, the relationship between the responsible areas of the Department of Agriculture, Fisheries and Forestry (DAFF) is at many levels poor, resulting in poor

communications, differing priorities, questionable allocation of resources and a lack of responsiveness to external (community) concerns.

The second relates to the actual location of these units within a large and complex organisation with multiple functions and priorities that requires many levels of management. There is an evident change in the managers of these units over the last 10-15 years with a decrease in the number of staff with a science background in senior management positions. Such staff are now more likely to be found in lower section management positions or operational roles while employees with little or no qualification or experience in animal or plant health but with aptitude or interest in management, are increasingly appointed to senior positions. While the reasons for this move can be supported if the primary objective is to secure management outcomes such as the development of business plans etc required to support the Departments status and funding in a competitive public service environment, it also means that such senior manager's appreciation of the science behind biosecurity and its application to the management of diseases and pests is less than optimal.

It also appears that policies on the development of managers combined with a desire for personal advancement mean that many managers are frequently moved between departments and through and between middle level and senior positions for "career development". While this may achieve the desired management development outcome, it also means that career progression for professional plant and animal scientists within their area of interest or expertise is limited. This is likely to in turn affect the recruitment and retention of scientists with an interest in managing broad science-based functional areas.

While generalist managers can certainly gain an appreciation of disease processes and thus biosecurity, this on-the-job learning is not a substitute for the appreciation of risk an experienced science graduate will acquire. Arguments that such individuals do not make suitable senior managers cannot be sustained – given the opportunity, encouragements and training, most scientists interested in good science based outcomes for their organisation can become effective managers.

Reversing the drift towards "non-content management" cannot in my view be achieved in the relevant units as currently structured and while they are part of the organisation. A reversal requires creation of a new organisation that has a basis in science and that provides career opportunities for science professionals with strong animal and plant health credentials.

This would also ensure quarantine and import risk assessment activities are managed independently with minimal opportunity for political interference. It would also provide the basis for establishing better linkages between science-based risk assessment and regulation and thus better prioritisation of resources and expenditure.

These concerns were addressed by the 1996 Nairn review of quarantine with a proposal for an independent statutory authority that would combine the roles of Biosecurity Australia, AQIS and potentially some functions of the Product Integrity, Animal and Plant Health Division of DAFF.

It is uncertain whether a statutory authority continues to be the most effective model. In any case a new organisation should include the role of Director of Animal and Plant Quarantine to provide strong and unified leadership to drive organisational behaviour and cultural change. Such a person would be a public servant and have ultimate decision making power on risk policy and import permits and have appropriate security of tenure, with decisions subject to judicial review. This approach mirrors the approach taken in the regulation of many other organisations with significant regulatory functions such as essential services and appears a logical way to proceed.

A fundamental change such as proposed also provides an opportunity to rewrite the Quarantine Act 1908 as part of the establishment and to re-examine the way in which all the parties involved in the quarantine continuum are engaged and provided with real opportunity for involvement in the development of policy.

The above can only be achieved with a fundamental review of the way the functions should be managed and funded. It will prove futile to address the governance and institutional issues without addressing the chronic lack of resources applied to these important functions.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Geoff Neumann', written over a diagonal line that extends from the top left towards the bottom right.

Geoff Neumann