



15 July 2008

Mr Roger Beale  
Chairman  
Quarantine and Biosecurity Review  
Department of Agriculture, Fisheries and Forestry  
GPO Box 858  
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Dear Roger

## **SUPPLEMENTARY INPUT - WESTERN AUSTRALIAN BIOSECURITY AGENCIES**

Thank you for the opportunity to meet with the Review Panel in Perth on 23 June 2008. As promised, please find below some supplementary comments and information.

### 1. Pest list integration

Further to data (Investigation Data Records 2007) provided earlier by Dr Shashi Sharma, the following summary of trends, pointers, issues is provided (see attached).

### 2. Regional differences in pest prevalence and risk

We discussed the marked improvement in Biosecurity Australia (BA) recognition of specific pest freedom for Western Australia (WA) in recent IRAs. Further collaborative work would still be beneficial in this area, including:

- greater emphasis of role of State's/Territories in providing evidence (to an agreed standard) for pest freedom, and regional difference in risk;
- BA consistently addressing regional differences for pest freedom with regard to import risk assessments, and export market access cases; and
- Routine entry into AQIS's ICON system of regional differences in pest freedom and associated import constraints (which has been slow even after BA has recognised pest freedoms).

Both the closer/full integration of BA and AQIS and modernisation of AQIS information systems will contribute substantially in this regard.

### 3. Better national coordination and border/post-border collaboration

In the context of discussion of a potential statutory model for national quarantine/biosecurity services, the Panel sought further advice regarding ways to ensure close border/post-border integration.

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There are a number of drivers for some form of a national statutory model, and there is merit in States/Territories being able to nominate a member(s) of the board of this entity (perhaps via relevant Ministerial Councils or individually to a selection panel).

There is also merit in some form of national review mechanism (either structural or functional) being put in place for Australia's collective biosecurity functions (i.e. AusBIOSEC plus human biosecurity). While it may seem more convenient to establish a National Biosecurity Council as the solution this would add to the substantial administrative infrastructure already in place – including Ministerial Councils, Standing Committees, National Biosecurity Committee, national quarantine/biosecurity authority (proposed), Animal Health Australia (AHA), Plant Health Australia (PHA).

We recommend a simpler approach: that the Minister for Agriculture, Fisheries and Forestry invite AHA, PHA and State/Territory Ministers (for biosecurity) to nominate senior representatives to join Federal authorities/agencies in an annual/bi-annual review of the functioning of the national border and post-border arrangements (from national, State/Territory, industry and community perspectives).

Further, we suggest the Minister for Agriculture, Fisheries and Forestry or Primary Industries Ministerial Council establish a process for more regular (say 3 yearly) external review of Australia's biosecurity arrangements (via tendered consultancy) with that report made available to appropriate parties.

#### 4. Domestic quarantine arrangements

The Panel reported some complaints about inconsistency and inefficiency of interstate quarantine arrangements. While it is WA's experience that unsubstantiated complaints about our quarantine restrictions are very rarely backed by substantiated cases for change, WA has long supported a national clearing mechanism to address inconsistent, inefficient and unjustifiable measures. The Domestic Quarantine and Market Access Working Group has proved incapable of resolving such issues. Plant Health Committee is currently developing a dispute resolutions process, based on the International Plant Protection Convention. As most issues are in relation to plant-related movements, it may prove beneficial for national plant industry organisations to have some involvement in any dispute resolution process via PHA.

Where nationally uniform post-border regulatory powers are required (e.g. serious exotic disease incursion) these can be achieved via referrals under the Quarantine Act. Following the UK Foot-and-Mouth Disease (FMD) outbreak, State/Territory governments supported amendments and processes that would enable the post-border application of the Quarantine Act in the event of a FMD outbreak. Based on previous experience, including genuine attempts to develop model legislation under a "uniform national animal and plant health legislation" initiative, broad post-border application of the Quarantine Act (or replacement legislation) seems unlikely. However, it has proved to be beneficial to establish national performance standards for critical legislation, with ongoing monitoring of progress of State/Territory regulatory reform in order to meet those standards.

#### 5. Operational border/post-border interface

The Panel sought further advice on improved functionality of the national border/post-border interface, for example, in relation to post-border leakage of wood pests in imported timber and wooden products. WA has had difficulty seeing why AQIS/PIAPH has been so reluctant to establish practical mechanisms to address this issue (except that to do so would recognise that significant leakage is occurring). It is

our view that a practical solution here lies in recognition that the border 'leaks'. Once this is recognised, importers/receivers can then be advised that they retain (shared) responsibility for any residual risk of pest presence. AQIS would continue to deal with detections in imported goods. Individuals would have responsibility for normal costs of treatment/destruction (under the Quarantine Act or relevant State/Territory law). State/Territory agencies would investigate other reports/detection. All governments would establish standing arrangements for cost-sharing for significant post-border responses (e.g. whole house fumigations).

#### 6. Comparative investments in biosecurity measures

We referred to domestic quarantine obligations imposed on the Gorgon Gas Development on Barrow Island (A Class Conservation Reserve) to demonstrate the large discrepancy that exists between this investment and other post-border biosecurity investments. While outside the Review panel's Terms of Reference, WA contends that it ought not be particularly difficult or costly to audit/estimate jurisdictional investments (including New Zealand) in pre-border, border and post-border biosecurity measures as a means of empirically establishing benchmarks in this regard. There would be a need to identify how best to benchmark this investment (e.g. cost/ha, cost/sectoral GVP, etc.).

#### 7. Zoonoses – clarification of comments at C2.3 in submission

The Panel sought clarification regarding section C2.3 in our submission. When the AusBIOSEC framework was originally proposed, consideration was given to whether the "Australian Biosecurity System" should include relevant aspects of human biosecurity (e.g. those human diseases that should be prevented from entry into Australia and eradicated if incursion occurred). After some consultation with health authorities, the decision was made to limit the AusBIOSEC framework to 'primary industries and the natural environment'.

We recommend that the Review reconsider if all biosecurity (human, primary industry, environment, etc.) should come together, with our preference being for a holistic approach to the Australian Biosecurity System (i.e. an expanded AusBIOSEC). Under this scenario, the National Biosecurity Council mooted by the Review Panel will be inclusive of relevant human biosecurity.

#### 8. Border filter not barrier

Panel discussion included reference to NAQS, exotic bee monitoring, etc.

WA's experience is that confusion exists within DAFF and PISC partners regarding responsibility for international border interception/detection where this cannot be achieved via inspection/clearance by quarantine staff:

- NAQS – Australian Government funding recognises the 'leaky border' principle and the surveillance/detection/response is required because of numerous, diverse potential entry points. Some confusion exists upon detection since eradication/containment action is then funded under national cost-sharing arrangements. Perhaps the best future option for State/Territories/industries is that improved NAQS funding for risk-based monitoring enables very early detection, thus leading to lower cost, more frequently successful eradication responses.

- Exotic bee surveillance (around 10 WA ports, Perth airport) – part AQIS funded (mainly northern WA ports) and DAFWA funded (mainly southern WA ports) – DAFWA coordinated delivery.
- Asian gypsy moth trapping (around ports) – DAFWA delivery funded by OCCPO.
- Torres Strait fruit fly monitoring – curiously, this program is jointly funded by PISC agencies, when all logic would have it funded/delivered under NAQS.
- Hazard Site Surveillance – biosecurity surveillance at high-risk sites (e.g. ports, major receival sites) – largely OCPPO funded with DAFWA delivery (and part-funding).

In closing, may I re-emphasise the critical issues raised by WA representatives:

- Strengthened science-based risk assessment (including addressing regional differences in pest status and risk).
- AQIS risk-based resource allocation including operational flexibility to aid improved responsiveness to changing risk profiles.
- A fully functional biosecurity continuum – based on better data and intelligence collection and sharing and clarity of roles/responsibilities.
- Recognition of a 'leaky border' as a basis for more functional 'shared responsibility' approaches (and a pathway to help move AQIS away from its current defensive culture).
- Sustainable science capability – including training, linkages/access to all existing national (and international) capability and better knowledge management systems.

Once again, thank you for the opportunity to meet with the Review Panel. Best wishes for your very important work.

Yours sincerely



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DEPUTY DIRECTOR GENERAL  
(BIOSECURITY AND RESEARCH)

Attachment: Post-Quarantine Detections – Lessons from the WA experience

Copy to: Chris Richardson, APB  
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## Post-Quarantine Detections - Lessons from the Western Australian Experience

The Department of Agriculture and Food (DAFWA) took responsibility for investigating post-quarantine incidents between November 2006 and October 2007. During this period:

- Total number Post-Quarantine Detections (PQD) investigated by DAFWA was 289.
- 9 (3.1%) incidents were detected by AQIS in post-border inspections at quarantine approved premises.
- 8 (2.8%) of the incidents were reported by Pest Control Operators (PCO's).
- The remaining 272 (94.1%) were reported by the owners (members of public).
- Number of these reported directly to DAFWA = 99 (34%), the remainder were passed on by AQIS.
- 187 of these incidents involved exotic organisms to Australia.

The reports were responsible for the detection of the major grain pests Khapra beetle and Karnal Bunt plus serious wood borer pests.

One hundred and fifteen (61.5%) of the 187 exotic pest cases involved imported timber products and clearly indicate that imported timber is a major biosecurity risk pathway. Further, in terms of pests not already present in Australia, timber was the pathway in over 90 per cent of the post quarantine detection cases clearly indicating that an appropriate level of protection (ALOP) is not being provided by the current risk mitigation measures being applied pre-border/border. The detection of cosmopolitan wood-boring pests in imported timber is a bio-indicator of failed phytosanitary measures.

In 2007, DAFWA detected 22 separate cases of Chinese auger beetle, *Heterobostrychus hammatipennis*, in imported willow-screen fencing. There was a recurrence of infestation in 2008 of this same product at the same time of the year by the same insect species involving the same importer. This indicates that there was no feedback loop by AQIS to rectify the deficiencies in the phytosanitary certificates brought to their attention in 2007. Of further concern was the failure of 'on-shore' fumigation measures paid for by the importer as his own risk-mitigation strategy. 'On-shore' methyl-bromide fumigations of two separate shipments proved in-effective. AQIS has implemented the Australian Fumigation Accreditation Scheme (AFAS) in some overseas countries with poor fumigation histories. AFAS requires the concentrations of fumigants and temperatures to be recorded during the fumigation process but AQIS does not require a similar recording of 'on-shore' fumigations – this needs to be required of both 'off-shore' and 'on-shore' fumigations for consistency and transparency.

This incident also highlights another feature of how AQIS deals with post quarantine detections. Following the discovery of Chinese auger beetles in 2007, DAFWA actively engaged the public in surveillance for these pests with 18 separate media reports. In comparison, AQIS did not make any media releases following the 2008 incident.

As above, the members of public are responsible for 94 per cent of all the post quarantine detections of exotic pests and are therefore the most effective component in the post-border phase of the quarantine continuum. The cost-recovery approach of AQIS to pass the cost of treatment on to the very people who have reported the suspect pest is a disincentive to the public participation and it is a flawed biosecurity strategy. It should be noted that the above figures are the result of very little publicity and that increased publicity would most likely result in the reporting of more incidents by member of public.