



BOARD OF AIRLINE REPRESENTATIVES OF AUSTRALIA
SUBMISSION TO THE QUARANTINE AND BIOSECURITY REVIEW
APRIL 2008

Introduction

The Board of Airline Representatives of Australia Inc. (BARA) is the industry association representing the interests of international airlines operating to and from Australia. BARA has been established as an incorporated body for eighteen years. Prior to that BARA operated for many years as an unincorporated body.

BARA aims to establish a recognised means of communication between member airlines and statutory and other organisations whose interests and actions influence or affect member airlines and the aviation industry. Its purpose is to act on issues affecting the aviation industry in Australia and to provide a single concerted voice on policy and other matters when dealing with the Federal and State governments and other aviation industry stakeholders.

BARA's membership currently comprises 38 scheduled airlines. Those airlines are involved in the carriage of passengers and freight into and out of Australia. In this context there are a number of concerns that BARA members have about AQIS procedures. Those concerns are set out below and address matters related to:

- (a) passenger processing,
- (b) disinsection,
- (c) pratique,
- (d) catering facilities and aircraft provisions and waste, and
- (e) freight processing.

BARA notes, however, that a review undertaken by Ernst & Young titled "Australian Quarantine and Inspection Service Review of Quarantine Border Security Strategies and Policies" (August 2007) may be released publicly in the near future. BARA, therefore, reserves the right to lodge a supplementary submission to this review should the Ernst & Young report raise any matters that are relevant.

Passenger Processing

BARA's member airlines have complained that there are now significant delays at the secondary – quarantine and customs – inwards screening points at Australian airports. The delays are especially acute at peak times. As a result of the delays, which come at the end of long distance flights, passengers are experiencing frustration that has led to unruly behaviour in long queues. Passenger frustration is heightened when the

delays result in missed domestic connections. BARA believes that urgent attention needs to be given to reducing queuing times.

There are a number of considerations to be addressed in pursuing this objective. These include the balance between the efficiency and effectiveness of AQIS border activities, available airport infrastructure and the basis upon which risk assessment is incorporated into the inspection process.

The Nairn Report of 1996 included the recommendation that:

“Quarantine Australia use risk analysis based on comprehensive detection databases and information systems to target resource allocation to increase the efficiency and effectiveness of border activities”.

The Government’s response to the Nairn Report recognised the need to balance “the need for timely clearance of passengers and goods without jeopardising quarantine security”. Unfortunately, the “risk analysis” approach envisaged by the Nairn Report does not appear to have been developed to its full potential. Other factors seemingly have intervened to reduce the optimum application of risk analysis, including:

- (a) In 2001 the outbreak of foot and mouth disease (FMD) in the United Kingdom resulted in the introduction of the Improved Quarantine Inspection (IQI) arrangements, incorporating deployment of additional x-ray machines at airports and additional inspection infrastructure and staff.
- (b) At the same time that IQI was introduced the Government introduced the requirement that 81% of arriving passengers be inspected.
- (c) Further subsequent concerns about heightened quarantine risks such as avian flu and the more recent outbreak of FMD apparently have resulted in intervention rates higher than the established 81% target.

The above factors have been imposed within the framework of airports’ privatisation and physical constraints on infrastructure and space available in international terminals where IQI occurs.

No one solution seems likely to unilaterally result in major inroads into queue times for secondary screening. A combination of the following options probably would be required:

- (a) increasing AQIS resources available for screening at airports,
- (b) undertaking appropriate infrastructure investment at airports to provide the space necessary for secondary screening,
- (c) revising the 81% inspection requirement and
- (d) only inspecting passengers in accordance with genuine risk assessment procedures.

A related problem with current AQIS inspection arrangements is the lack of performance standards for passenger processing. The aviation industry has encouraged AQIS to develop such standards, but without success. BARA maintains that, in the same way that AQIS has developed performance measures for the level of inspections and the quantity of quarantinable goods seized, there should be established performance standards for the rate of passenger processing.

Disinsection

The Nairn Report, at Recommendation 67, recommended that disinsection of aircraft be discontinued. The recommendation was not accepted by the Government, but the Government noted that further scientific assessment of the requirement for disinsection should be investigated. BARA understands that the further scientific assessment was undertaken.

BARA maintains that the need to continue disinsection should be reviewed at regular and appropriate intervals. Further, research into the use of non chemical alternatives also should be undertaken.

Pratique

The Quarantine Act and Quarantine Regulations provide that all international aircraft arriving in Australia must obtain radio pratique in the event that:

- (a) any passenger is ill or had died during the flight,
- (b) a live animal is on board the aircraft or had died during the flight, or
- (c) the aircraft has not been disinsected in accordance with approved procedures.

This form of pratique is commonly referred to as pratique by exception. However, during the SARS outbreak all aircraft had to report the status of all passengers and crew prior to arrival. This latter form of pratique is commonly referred to as positive pratique. BARA maintains that the pratique requirements should be in accordance with pratique by exception procedures. As the time immediately prior to landing is the busiest period of the flight for both the flight and cabin crews, positive pratique merely adds to crew workloads for little, if any, identifiable bio-security benefit.

Catering Facilities and Aircraft Provisions and Waste

Some BARA members operate their own catering facilities in Australia. Those members have reported that the various State offices of AQIS adopt different approaches for quarantine compliance associated with the facilities. BARA maintains that each State AQIS office should have in place a Compliance Agreement with each catering facility. However, this is not the case. Such agreements should be established with each airline catering facility as a matter of urgency to ensure uniformity of quarantine compliance across the country and clarity regarding compliance requirements.

BARA members also have reported problems related to the re-use of "dry goods" carried on aircraft. These items include biscuits, nuts and other packaged snacks. Such items, if not opened or consumed on board the aircraft, may be removed from the aircraft to restock other international aircraft. As it does not present any quarantine risk, there should be a formal recognition and acceptance of the practice. BARA believes that AQIS should issue a formal notice to that effect.

The disposal of galley waste from aircraft results in a high cost impost on airlines. This matter was considered by the Nairn Report. Recommendation 79 of the Report

stated that "galley waste and other refuse from international aircraft may be disposed of at a municipal or other commercial waste disposal facility under standard waste control measures". The Government responded that further scientific assessment was required before a final decision could be made in relation to the recommendation. However, the aviation industry has not been advised whether the proposed scientific assessment ever occurred and aircraft galley waste is still being treated as quarantinable waste. BARA maintains that, in the event that the suggested scientific assessment of disposal of aircraft galley waste has not occurred, it should be undertaken as a priority and the treatment of aircraft galley waste should be reconsidered.

Freight Processing

BARA understands that AQIS is considering the application of quarantine import requirements to goods that transit Australia en-route to a foreign destination. This procedure would result in considerable disruption to the freight operations of BARA members, particularly BARA's Australian-based members, Qantas and Virgin Blue. These airlines carry produce and goods from New Zealand and Pacific Islands to markets beyond Australia. However, such a practice also would affect foreign carriers which operate through Australia to ports beyond Australia, such as New Zealand.

BARA maintains that AQIS, similarly, should adopt a "risk analysis" approach to freight processing procedures in the same way as such an approach should be adopted for passenger processing procedures. A Compliance Agreement for freight operators, similar to that proposed for catering facility operators, is recommended. A Compliance Agreement would promote uniformity of freight processing procedures across Australia and provide an auditable basis for minimising risk to Australia.

Concluding Remarks

BARA maintains that AQIS has an important role to play in ensuring Australia avoids unacceptable bio-security risks. However, this important role must be balanced against the need to facilitate expected growth in trade and tourism. The appropriate balance of these objectives would be promoted through AQIS adopting the following operational procedures:

- (a) adoption of a genuine "risk assessment" approach to both passenger processing and freight processing procedures,
- (b) implementation of Compliance Agreements with airlines and catering facilities to promote uniformity of compliance procedures and an auditable basis for minimising bio-security risk, and
- (c) regularly reviewing compliance procedures and their scientific underpinnings to ensure that they are flexible enough to avoid, firstly, unnecessary constraints on the movement of people and freight across Australia's border and, secondly, unnecessary additional costs on airlines and other transport operators.