

1. Are Australia's quarantine and biosecurity systems appropriate to maintain its ALOP (very low risk, but not zero)?

NOT ENTIRELY

2. Is ALOP understood and applied in a consistent way?

3. NOT ALWAYS

Is it achieved in a way that is not more trade restrictive than required?

APPLIED CORRECTLY AND IS NOT TRADE RESTRICTIVE

4. Should the wider implications – for exporters, consumers and the economy – be taken into account when developing quarantine and biosecurity arrangements, and if so, how?

YES BUT ONLY IF CONSISTENT WITH THE SPS AGREEMENT
CONSUMERS ARE NORMALLY NOT CONSIDERED.

5. What are the benefits of Australia's current approach to quarantine and biosecurity?

PROTECTION OF AUSTRALIA AGAINST EXOTIC SPECIES

6. Is it well understood in the Australian community that quarantine measures can only be applied to the extent that they are necessary to protect human, animal or plant life or health that they are not more trade restrictive than required, and that they may not be used as an industry protection mechanism?

IT DOES NOT SEEM TO BE

7. Do Australia's risk assessments (including import risk analyses) competently and comprehensively assess risk and risk management issues when providing advice on market access requests and import applications? Are they sufficiently timely?

NO IRAS ARE NOT TIMELY LARGELY DUE TO RESOURCE RESTRICTIONS, REPEATED CHANGES IN REQUIREMENTS, EXCESSIVE CONSULTATION AND CHANGING PRIORITIES BECAUSE OF POLITICAL ISSUES.

8. Is the role of the Eminent Scientists Group in the import risk analysis process understood and appropriate?

THE ESG MAY BE UNECESSARY AS IT ADDS AN ADDITIONAL LEVEL OF SCUTINY THAT ADDS LITTLE TO THE DOCUMENTS AND CAUSES DELAYS.

9. Is the quarantine and biosecurity framework adequate to analyse and manage risks to the environment? NO

10. Does Biosecurity Australia have the skills/ability to assess any such risks? NO THE RISKS TO THE ENVIRONMENT ARE GENERALLY NOT CONSIDERED AND THE SKILLS PRESENT IN BA DO NOT HAVE THE EXPERIENCE OR EXPERTISE TO MAKE SUCH ASSESSMENTS

11. Are risk analyses, import policy determinations and permit conditions sufficiently updated through monitoring of actual experience in the application of risk management measures? Do the appropriate feedback loops exist and are they effective?

NOT IN SOME AREAS SOME EXAMPLES ARE EDIBLE FUNGI, ORNAMENTAL BULBS, ONIONS SNOW PEAS WHERE IRAS AND OR REVIEWS HAVE BEEN PART COMPLETED BUT THEN POSTPONED..

12. Does AQIS implement risk management in a manner consistent with the advice/recommendations provided by Biosecurity Australia and the Director of Animal and Plant Quarantine (as outlined in the Import Risk Analysis Handbook)?

PROBABLY YES BUT ADVICE FROM BA IS NOT ALWAYS SOUNDLY BASED NOR IS IT TIMELY.

13. Is there adequate auditing and verification of pre-border, border and post-border measures to ensure that policy determinations and permit conditions, including arrangements for co-regulation with industry, are in fact meeting the appropriate standard?

14. How should the quarantine and biosecurity continuum (pre-border, border and post-border) be monitored to ensure that the system functions (to prevent and respond to pest and disease INTERCEPTIONs)?

BY DATA BASING SPECIES DETERMINATIONS FOR ALL INTERCEPTIONS DETECTED

15. Are the arrangements for sharing pest and disease information between the Commonwealth, the states and territories and industries working adequately?

NOT ALWAYS WITH SOME STATES

16.

17. Are the current roles and responsibilities of the Commonwealth and the states and territories well understood and operating effectively?

HARMONISATION OF REGULATIONS BETWEEN STATES AND THE COMMONWEALTH REQUIRES ATTENTION TAKING INTO CONSIDERATION THE DIFFERENT CONDITIONS AND REQUIREMENTS OF EACH STATE.

18. Is the *Quarantine Act 1908*, as amended, relevant and effective to meet Australia's current quarantine and biosecurity needs? Should it be rewritten and modernised? PROBABLY

19. Is there appropriate interaction between Biosecurity Australia, AQIS and the Product Integrity, Animal and Plant Health Division and other relevant Commonwealth and state and territory agencies?

NO

20. Should the current approach, which separates the roles and responsibilities of AQIS, Biosecurity Australia and the Product Integrity Animal and Plant Health Division, be integrated?

YES. THE CURRENT STATUTORY BODY FOR BA RESULTED IN UNNECESSARY DUPLICATION OF ADMINISTRATIVE FUNCTION AND IS BOTH ECONOMICALLY AND OPERATIVELY INEFFICIENT.

21. Should the quarantine and biosecurity function be integrated within the Department of Agriculture, Fisheries and Forestry, or exist as a separate agency (statutory authority)?

INTEGRATION IS PREFERABLE

22. Should the same regulatory agency deal with both exports and imports?

YES

23. Are resources available to Australia's quarantine and biosecurity authorities deployed across the continuum to the areas of highest risk/return?

NO BECAUSE PRESSURE FROM OTHER COUNTRIES TO ALLOW THEIR EXPORTS TO ENTER AUSTRALIA IS GIVEN PRIORITY RATHER THAN HIGHEST RISK CATEGORIES.

24. To what extent and under what conditions is it appropriate to use private facilities in the quarantine and biosecurity system?

PROBABLY NONE AS SECURITY CANNOT BE ASSURED

Are the current monitoring, auditing and supervision arrangements for public and private quarantine facilities effective?

SINCE ESCAPES FROM THESE FACILITIES HAVE RECENTLY OCCURRED, AUDITING IS APPARENTLY NOT EFFECTIVE.

25. 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?

HIGHEST PRIORITY AREA IS IN SUFFICIENTLY EXPERIENCED STAFF TO CARRY OUT RISK ASSESSMENTS.?

26. Australia's ALOP is very low, but not zero. Is this understood in the relevant communities? PROBABLY YES BUT NOT LIKED.

27. Are the consultative arrangements used during import risk analyses appropriate and effective?

CONSULTATION HAS INCREASED EXPONENTIALLY IN RECENT YEARS AND IS NOW EXCESSIVE.

Are the outcomes of import risk analyses effectively communicated to domestic and international stakeholders? YES

28. Is research appropriately funded, coordinated and prioritised?

ONLY IN SOME AREAS (SEE BELOW)

29. Is the distribution of the research effort appropriate along the quarantine and biosecurity continuum?

30. NO MORE RESEARCH EFFORT SHOULD BE PUT INTO TAXONOMY AND DATA BASING INTERCEPTIONS.

31. What methods could be used to set and review research priorities across the continuum?

INDEPENDENT SCIENTISTS

32. In the context of competing research priorities, is sufficient emphasis given to research on new technologies for use in quarantine and

biosecurity, including as control measures, in product integrity, and certification systems?

33. YES FOR THE MOST PART

34. In the context of competing research priorities, is sufficient emphasis given to research on risk analysis methods?

YES FOR THE MOST PART

35. How effectively is new information from research activity incorporated into Australia's risk management measures?

QUITE WELL WHEN IT IS AVAILABLE

36. Are there any critical information or knowledge gaps that can be remedied to support better research and policy outcomes?

YES THE MOST CRITICAL INFORMATION GAP IN IMPORT RISK ANALYSIS IS THE INADEQUACY OF TAXONOMIC INFORMATION ON THE AUSTRALIAN FAUNA. THIS IS PARTLY DUE TO LACK OF EXPERIENCED PERSONNEL TO CARRY THIS OUT BUT TO LACK OF FUNDS TO PROGRESS KNOWLEDGE.

37. Who should pay for quarantine and biosecurity research?

BOTH EXPORTER IMPORTER AND GOVERNMENTS