

## Guidelines on making a submission for a review by the Inspector-General of Biosecurity

The Inspector-General of Biosecurity (Inspector-General) invites submissions on any aspect of a review being undertaken.

The closing date for submissions to a specific review conducted by Inspector-General will be advised on the Inspector-General's [Current and completed reviews](#) web page.

The email and postal addresses for submissions are provided at the top of the submission cover sheet.

### Preparing your submission

Prior to making a submission it is recommended that you consider the scope of the review, as submissions that address topics outside of the scope may not be considered further.

When making a submission, the inclusion of specific examples or data, where possible, would assist the Inspector-General. Submissions are not required to meet a defined format or length but you should include a summary of your key comments if the submission is greater than three pages.

The Inspector-General prefers to receive submissions via email in Microsoft Word format. If providing hard copies, they should be typed or clearly written on A4 paper.

Submissions cannot be accepted unless accompanied by the *Submission Cover Sheet*. Confidential material should be provided under a *separate cover* and be clearly marked 'IN CONFIDENCE'. Further information about confidential information is set out below.

If you provide personal information about an individual other than yourself, you should notify the individual that you have provided their personal information to the Inspector-General. Make them aware of this privacy notice and draw their attention to the Inspector-General's privacy policy.

Copyright in submissions resides with the author(s), not with the Inspector-General.

### Confidentiality and publication of submissions

Subject to some exceptions including confidentiality, the Inspector-General may publish submissions or make them available to particular persons or organisations, including the Department of Agriculture and Water Resources. The Inspector-General may do so in any way she deems appropriate and may make the whole, or part of the submission available.

However, you can request that some or all of your submission or you name and identifying information be dealt with confidentially and not be made publicly available or included in a report. If you make such a request, the Inspector-General may still have regard to the information when conducting the review. Your options to request confidentiality of your identity or submission is discussed further below.

*When the Inspector-General will not make submissions publicly available?*

The Inspector-General will also not make a submission, or part of a submission, publicly available, if:

- a person requested that the information not be made available or included in a review request, *and* the Inspector-General agreed to that request;
- it contains offensive language, potentially defamatory material or copyright infringing material;
- it contains information that the Agriculture Minister directed the IGB has decided would be prejudicial to the public interest, if made publicly available;
- it names, or otherwise specifically identifies:
  - an officer (other than the Director of Biosecurity) or an employee of a Commonwealth body;  
or
  - an officer or employee of a State or Territory body; or

- a consultant to the Department; or
- a member of the Australian Defence Force.

The Inspector-General will also not make available a record of an oral submission made by a person unless the person has verified the content of the record and none of the above restrictions apply.

*When will the Inspector-General publish your name?*

For submissions made by individuals, no address details, except your name and the state or territory in which you live, will be published. Where you make a submission on behalf of your organisation, your name and the name of your organisation and the state or territory in which the organisation is based will be published.

However, if you have asked the Inspector-General not to make your name available, or not to otherwise identify you or your organisation, the Inspector-General must not do so. Unless another exception applies, your submission will be made publicly available without identifying you.

*What if the Inspector-General refuses my request that the submission not be made publicly available?*

If the Inspector-General refuses your request, the Inspector-General will notify you of the refusal.

You may ask to have the submission, or part of the submission, returned to you and in case of an oral submission you may withdraw your submission.

## **Privacy Notice**

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable. Personal information that is collected under or in accordance with the *Biosecurity Act 2015* is also 'protected information' under the Biosecurity Act.

The Inspector General of Biosecurity collects 'protected information' including personal and sensitive information for the purpose of undertaking reviews under the Biosecurity Act of biosecurity officers' performance of functions or exercise of powers. Protected information collected by the Inspector-General will only be used or disclosed where this is permitted under the Biosecurity Act and other applicable legislation.

The Inspector-General may disclose your information to other Australian Government agencies, persons or organisations, including the Department of Agriculture and Water Resources.

When the Inspector-General conducts a review, he or she is required to publish a report. While review reports are not a review of a single performance of a function or exercise of power by a single biosecurity official, these reports may contain personal information. Reports will be published on the Inspector-General website, administered by the department. The Inspector-General will undertake reasonable steps to ensure that personal information is included in public reports only where necessary.

See the Inspector-General's [Privacy Policy](#) to learn more about accessing or correcting personal information or making a complaint. Alternatively, telephone the Inspector-General on +61 2 8334 7498.

## **Further information**

Further information on the review currently being undertaken can be found at Inspector-General's [Current and completed reviews](#) web page.

If you require further information on making a submission, contact the IGB Support team by email at [InspGenBiosecurity@agriculture.gov.au](mailto:InspGenBiosecurity@agriculture.gov.au).

## Submission Content

Thank you for the opportunity to provide input into the *Assessment of the effectiveness of biosecurity measures to manage the risks of brown marmorated stink bug (BMSB) entering Australia*.

Agriculture Victoria is currently involved in responses to post border detections in three distinct locations. One is located on the boundaries of the Port of Melbourne and the other two have been associated with specific import pathways (machinery from USA and pots from Italy). We understand that in the case of the pots from Italy there was a failure in offshore treatment.

Given the increased number of post border detections of BMSB (since the last BMSB season), there are a number of issues that should be addressed to improve management of these detections, but these are generally outside the scope of this review.

Within the context of the review's terms of reference, Agriculture Victoria makes the following comments:

### ***BMSB profiling, assessment, inspection and treatment of conveyances and cargo arriving in Australia***

With the spread of BMSB around the world, and varying weather patterns/conditions due to climate change, it is likely that the 'risk profile and risk period' for BMSB will change. Further, depending on the hemisphere of origin and conditions en route, BMSB life cycle stages will vary and need to be factored into any future risk model and strategy. It is also possible that unusual conditions in places of origin may alter the BMSB risk period (for eg., early onset of winter conditions may change the risk profile for specific locations). It is expected that any risk profiling will need to be reviewed and adjusted regularly (likely, annually).

### ***Management of approved arrangements involved in onshore BMSB management activities, including reviewing the effectiveness of measures taken by industry to ensure compliance with biosecurity requirements***

It is our understanding that information about the location and risk profile of Approved Arrangement (AA) sites is confidential unless the AA has agreed to release that information. (It would be good to clarify if this is the case). The lack of full information available to state and territory governments about the location and profile of AAs (due to confidentiality reasons) can impact on management of post border detections and the timely and strategic development of risk-based surveillance programs. Development of an ongoing surveillance grid would be greatly enhanced if we had knowledge of where all AA sites were located, and where possible, their risk profiles.

***Approval/accreditation of offshore and onshore treatment providers***

We are aware that there have been offshore treatment failures. Where these are identified, options for risk reduction should be further considered (for eg., recall, automatic rejection for repeat offender importers, establishment of trapping grids at ports of entry, prohibition of high risk goods from high risk countries etc). If state and territory governments can be provided with as much information about off shore fumigation failures, we can then target post border surveillance work to prior shipments potentially linked to 'current failed treatments.'