



FEDERAL CHAMBER  
OF AUTOMOTIVE  
INDUSTRIES

ABN No 53 008 550 347

LEVEL 1

59 WENTWORTH AVENUE

KINGSTON ACT 2604

TELEPHONE 02 6247 3811

FACSIMILE 02 6248 7673

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Dr Helen Scott-Orr  
Inspector-General of Biosecurity  
C/O Department of Agriculture and Water Resources  
GPO Box 657  
MASCOT NSW 1460

### Assessment of the Effectiveness of Biosecurity Measures – Brown Marmorated Stink Bug

Dear Inspector-General,

The Federal Chamber of Automotive Industries (FCAI) is the peak industry body representing the importers and distributors of new motor vehicles, motor cycles and ATV's in Australia. The FCAI member brands account for approximately 99% of new vehicles sold in Australia each year.

FCAI is involved in a range of activities with the Department of Agriculture and Water Resources (DAWR) in the management of the BMSB and other biosecurity risks, including the important offshore mitigation programs aimed at significant reductions in contamination on new motor vehicles arriving in Australia. Our history of involvement leads us to understand that management of the current BMSB risk is a very complex task.

That said industry stands ready to implement whatever scientifically based treatments are required however we need a significant period of notice specifying the products, countries and detailed treatment methodologies which are to be applied. The notice period for the 2017/18 season was far too late, ending up costing industry significant extra resources (financial and human). Throughout the Department's deliberations the FCAI impressed upon the Department the need to advise of the measures in a timely manner. The FCAI members did not have a particular view on what the measures should be as our sector is responsible for manufacture and distribution of new motor vehicles, not environmental science.

It was disappointing that during the period leading up to the finalisation of the measures the Department was of the view that they have told industry what the measures are, when all they had in fact advised was that heat treatment (in our case) could be used. The times and temperatures were not specified until very late in the piece and it is only once these specifics are received that the industry could begin the necessary commercial consultations and contract arrangements with potential overseas treatment providers.

With the expanded measures now in place there are still, apparently, significant detections of live, dead and recently deceased BMSB. We understand that all FCAI members are treating their vehicles according to the directions from the Department. The issue is, from our perspective, that there are other products, untreated, mixed with treated goods destined for Australia.

The cross-contamination makes analysis of the effectiveness of the treatment extremely difficult. Likewise, the effectiveness of the measures at all is nearly impossible to accurately gauge when we have vehicles from the same factory, of the same model, treated in accord with the Departmental directions at the port of export, for example Antwerp, which are then accompanied on the first part of the voyage with other vehicles of the same make and model untreated and unloaded in South Africa. Clearly the potential for vehicles destined for Australia and New Zealand to be re-contaminated from BMSB hiding in untreated vehicles or suffer an initial round of contamination is high.

To the Department's credit we understand they have been monitoring the effectiveness of treatment providers and where there is a trend that indicates performance at a less than acceptable level it appears they are quick to investigate and act. These pro-active measures are essential to ensure that the biosecurity risk is minimised and also to ensure that those providers applying the treatment in the correct manner are not relatively penalised through an assumption that the treatment is not working.

Currently all RORO vessels are subject to a Seasonal Pest Inspection process. This process can take up to six hours and at present must be conducted once the vessel has tied up at the terminal. It does not take too much analysis to work out the serious congestion and delays that will occur through this process. As an added complication, the SPI will be conducted at the first port of call so the resource implications for Fremantle and Brisbane (in our case) are very significant. The FCAI has mentioned to the Department many times the need to increase resources to cope with demand however our information is that this has still not happened.

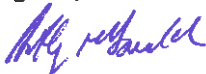
A further major impact is the inability of the Department to meet their service level commitments for inspection of cargo more generally. It is apparent that there are instances where our members have had to send vehicles to cleaning prior to any direction from the Department as the cost of demurrage (which kicks in as the vehicles cannot be moved until the inspection at first point of rest) is higher than the cleaning cost. Our point is that neither should be deemed a necessary cost without proof, through inspection, that there is indeed an issue to be addressed. This again appears to be a resource issue.

The industry in Australia often manages the New Zealand market. The difference in treatment measures and countries treated as high risk countries by Australia compared to New Zealand is yet another complicating factor. We ask that the two countries align their treatment and country policies to ensure that a consistent and efficient approach can be applied.

It would seem to the FCAI that due to the BMSB not being seen as a pest that needs controlling in Europe or North America (our understanding) it is likely that there will be ongoing BMSB measures for certain goods shipped from high risk countries to Australia. Given this, FCAI believes that it would be useful for the Department to engage with innovative treatment providers and/or shipping lines to consider new ways to mitigate the risks. The development of a successful in-transit treatment approach would be a valuable application of the DAWR resources in our view.

Thank you for the opportunity to make this submission and please feel free to contact Tony McDonald at the FCAI on 02 6229 8217 if you have any further questions.

Regards,



Tony McDonald  
A/G Chief Executive  
February 2019