Australian Government
Inspector-General of Biosecurity

Review of documentation requirements for the biosecurity risk assessment of imported goods

Review Report 2025-26 26/01

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Acknowledgement of Country
We acknowledge the Traditional Custodians of Australia and their continuing connection to land and sea, waters, environment and community. We pay our respects to the Traditional Custodians of the lands we live and work on, their culture, and their Elders past and present.

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Inspector-General Foreword

Documentation is essential to the operation of the biosecurity system. Without the use of documentation, the biosecurity system would not be able to function. Documents inscribe the story of the goods that are arriving on our shores, and these stories let us decide whether those goods should enter, and under what circumstances.

At the same time, we have to be alert to the fact that, like all stories, the stories these documents tell may not be true. We also have to be aware that ensuring documentary compliance is not the same as managing biosecurity risk – it can be, but they are not automatically the same things. Verification and assurance are critical steps in determining fact from fiction.

During the course of this review, I had the opportunity to see many biosecurity officers and policy staff at work and understand their processes and thinking. I was impressed by the fact that most of them clearly understand the mission of managing biosecurity and protecting Australia from unnecessary risk. At times, the challenge for officers at all levels are the tools they have to use and the constraints of knowledge and experience.

Like in all regulatory operations, there are tensions inherent in the work undertaken at the border. While it is important there are regulatory guardrails, guidelines and precedents, there must always be space for consideration, thought and judgement. This can be a creative tension within regulatory activities – or it can be a limiting one.

At present, the department may not always be getting the balance right – the balance of trust over verification or judgement over constraint. In this report, I have considered and provided advice regarding where I think improvements can be made to operations and where that rebalancing can occur.

The department must rely on documentation – it is not possible for every shipment into Australia to be inspected or investigated. Finding the way to ensure that this introduces as little further risk as possible is the core of this review.

Many thanks to the departmental staff and industry stakeholders who provided their time and thoughts and who let me and my team watch over their shoulders. Their input has been vital to formulating this report.

Dr Melissa McEwen
Inspector-General Biosecurity

15th October 2026

Executive Summary

Documentation underpins Australia's modern biosecurity system. Every day, decisions about imported goods are made using permits, certificates, declarations and other documentary evidence. This approach is essential to managing increasing trade volumes and enables regulatory effort to be directed towards higher-risk pathways.

Throughout the review, the Inspector-General observed knowledgeable and committed staff applying professional judgement to manage biosecurity risks in often complex operational environments. Across the department, officers demonstrated a strong understanding of risk and a willingness to engage critically with complex assessment tasks.

The Inspector-General's principal concern is not that documentation is used as a biosecurity control, but that reliance on documentation has grown faster than the assurance arrangements supporting it.

The department expends significant effort developing, collecting, assessing and managing documentation. Yet in many cases the department has limited visibility of whether the information contained within this documentation accurately reflects real-world treatments, manufacturing processes, ingredients or other controls.

The Inspector-General did not identify evidence of widespread documentary fraud, or that documentation is ineffective as a risk-management tool. Rather, observations throughout the review indicate a growing gap between the role documentation now plays within the system and the level of assurance available to support reliance on that documentation.

Documentation remains essential, but confidence varies

Documentation is a critical control throughout the import pathway. It informs risk assessments, supports decisions regarding permits and import conditions, and enables the efficient movement of compliant goods.

The Inspector-General found that departmental processes are generally effective at confirming whether required documentation has been provided. However, the review identified less emphasis on the level of assurance that documentation provides regarding the management of biosecurity risk, particularly where evidence originates from complex international supply chains or entities outside Australian regulatory oversight.

The review identified a broader risk of “paper compliance”, whereby documentary requirements may be satisfied while the level of assurance regarding the effectiveness of underlying risk controls remains uncertain. In the Inspector-General's view, documentary compliance should not necessarily be assumed to equate to risk assurance.

To address this risk, the review's primary recommendation is that the department considers how to strengthen its assurance and verification processes for documentation to increase confidence that documents accurately describe the contents, ingredients and manufacturing processes of imported goods.

Integrity and fraud capability will become increasingly important

The review found that the integrity of documentation cannot always be assumed. Staff described encounters with altered, misleading or potentially fraudulent documentation and demonstrated awareness that documentary evidence may not always provide a complete picture of risk. However, support for identifying, reporting and responding to documentation integrity concerns appears less mature than other aspects of documentary assessment.

The review found uncertainty regarding what constitutes documentary fraud, limited visibility of outcomes once concerns are reported, and relatively few mechanisms designed to systematically identify patterns of repeat behaviour.

The Inspector-General considers that officers should be better supported to identify and report documentation fraud. As reliance on documentation continues to grow, confidence in the integrity of that documentation will become increasingly important to the effectiveness of the biosecurity system.

Stronger connections between policy and operations would improve outcomes

Throughout the review, the Inspector-General observed that operational staff routinely identify issues associated with the interpretation, verification and practical application of documentation requirements. Their experiences provide valuable insights into how import conditions function in practice and where requirements may not align neatly with biosecurity risk.

The review identified opportunities to strengthen links between policy, technical and operational functions. While mechanisms exist to capture operational feedback, frontline experience is not always consistently incorporated into the development and refinement of import conditions, guidance and documentary requirements.

The Inspector-General considers that operational expertise is one of the department's most valuable sources of assurance intelligence. Stronger and more direct connections between those developing import requirements and those responsible for applying them would support requirements that are more practical, verifiable and risk-based. The review also identified opportunities to strengthen communication and information-sharing across the biosecurity system, including between operational staff, policy teams and industry participants.

Staff capability is a strength of the current system

The review observed officers routinely navigating unclear requirements, interpreting complex documentation and identifying issues not readily apparent through system prompts or process guidance. It also found positive evidence of leaders encouraging critical thinking, professional judgement and a stronger focus on assessment quality.

At the same time, staff reported challenges associated with complex systems, fragmented information sources, inconsistent feedback loops and requirements that do not always reflect operational realities. These issues increase reliance on local knowledge and experience and can make consistent application of requirements more difficult.

Despite these challenges, the review found that operational staff remain one of the department's most effective safeguards against biosecurity risk. It is critical that the department continues to invest in this capability and look to ways to improve it. Current systems can create high levels of cognitive load and challenging components of the role, like choosing correct BICON cases, could be better supported.

Effort is not always aligned with assurance

A recurring theme throughout the review was the significant effort invested in documentary compliance activities.

Assessment officers, inspectors, policy teams, industry participants and technical specialists all contribute substantial resources towards generating, interpreting and managing documentation requirements.

The review identified examples where documentation requirements created administrative burden without a clear improvement in assurance outcomes, including repeated assessments of well-understood pathways, reliance on documentation that can be difficult to verify, and processes that continue to consume resources long after the original risk rationale has changed.

The Inspector-General considers that assurance effort should be proportionate to the assurance it provides. Where documentary requirements consume significant departmental and industry resources without materially improving confidence in risk management outcomes, there is an increased risk that effort is diverted from higher-value assurance and biosecurity activities. Opportunities exist to improve this by measures such as increasing the agility of the Goods Determination, considering moving away from individual transactions to batched approaches and maximising the use of pathways like Class 19 approved arrangements.

Conclusion

The review found that documentation remains an essential and appropriate component of Australia's biosecurity system and is supported by a capable workforce committed to managing biosecurity risk. However, if documentation is to continue carrying an increasing share of the system's evidentiary burden, greater emphasis must be placed on assurance, verification and confidence that documents accurately reflect reality.

While significant effort is invested in documentary compliance, the level of assurance derived from that effort is more variable. This is particularly apparent where documentation is difficult to verify, where integrity concerns arise, or where compliance with documentary requirements becomes disconnected from confidence that risk controls have actually occurred.

Meeting that challenge will require not only stronger assurance and verification arrangements, but also more effective mechanisms for connecting policy, technical and operational expertise across the biosecurity system so that lessons learned in practice are reflected in the design of future controls.

Recommendations

Recommendation 1 - Critical

The department considers how to improve its assurance and verification processes for documentation to increase confidence that documents accurately describe the contents, ingredients and manufacturing processes of imported goods.

Recommendation 2 - Major

The department considers the design and use of import permits with a view to reducing administrative burden, improving the clarity and usability of permit conditions, and ensuring permit requirements remain proportionate to the biosecurity risks they are intended to manage.

Recommendation 3 - Major

The department must do more to ensure there are active and ongoing links between those developing import conditions and operational staff. These links are needed to ensure effective feedback loops for information and a commitment to actioning feedback. It is critical that technical and policy staff understand operational realities. These links need to go beyond the BICON issues register and could include approaches such as the use of multidisciplinary teams for the development of import conditions, staff exchanges between areas and regular face-to-face meetings at APS levels.

Recommendation 4 - Major

The department ensures greater opportunities are developed for staff to understand the wider operations of the biosecurity system through exchanges, shadowing and secondments. This should include policy staff improving their understanding of operations and should consider opportunities for assessment officers to spend time seeing how brokers operate.

Recommendation 5 - Important

The department strengthens mechanisms for structured information sharing between document assessment officers on a national level, including providing ongoing formal support for The Grove.

Recommendation 6 - Important

The department considers and implement approaches to support officers in using BICON, in particular the selection of appropriate cases.

Recommendation 7 - Critical

The department increases support and resources for officers to identify and report documentation fraud.

Recommendation 8 - Major

The department considers the viability of the expansion of the CCV scheme and ensures these inspections are seen as a priority. Further the department examines ways in which it can reduce the predictability of its processes and improve verification and assurance.

Recommendation Classification Guide

Critical

Recommendations that identify significant gaps in the management or assurance of biosecurity risk. Failure to address these recommendations may result in biosecurity risks not being appropriately identified, assessed or managed, or reduce confidence that biosecurity controls are operating as intended.

Major

Recommendations that identify weaknesses in the design, capability, coordination or operation of the biosecurity system. While these issues may not represent a direct gap in the management or assurance of biosecurity risk, they can limit the department's ability to manage risk effectively by reducing capability, creating inefficiencies, or directing resources away from higher-value biosecurity activities.

Important

Recommendations that identify opportunities to improve the performance, consistency or efficiency of the biosecurity system. While these issues may affect productivity, user experience or operational consistency, they are not expected to materially affect the department's ability to manage biosecurity risk if left unaddressed.

Findings

Section 1 - Design, Development and Maintenance of Documentation Requirements

1.1 There are gaps between policy development and operational implementation that can result in requirements that are impractical to comply with, difficult to verify, and not always aligned to biosecurity risk. There is a need to strengthen the connection between those developing documentation requirements and those responsible for applying them in practice.

1.2 The approach to updating the Goods Determination currently lacks agility, leading to a lack of transparency and an increased reliance on import permits.

1.3 There is significant room for improvement in the efficiency and effectiveness of the use of import permits by the department.

1.4 Documentation requirements within BICON would benefit from a more structured and proactive approach to review and maintenance. Clearer mechanisms for identifying, prioritising and progressing updates, alongside greater consistency in the application of risk-based principles, would help ensure requirements remain fit for purpose, proportionate to risk, and practical to apply in an operational setting.

1.5 Given operational staff have experience in the interpretation and application of requirements, their involvement is critical to ensuring documentation requirements are clear, practical, and aligned with operational realities. Early and meaningful engagement with these staff potentially through the use of multidisciplinary teams to develop requirements, rather than relying solely on post-development feedback, would support the development of more effective and implementable requirements. Further, timely responses to frontline feedback should be a priority.

1.6 Assessment officers would benefit from additional support provided in refresher training and/or better up-to-date work instructions.

Section 2 – External interactions

2.1 The focus on individual transaction level interactions creates inefficiencies without a commensurate reduction in risk and the department should consider its ability to implement entity-level, batched, annual or other approaches.

2.2 Current documentation processes may provide assurance of documentary compliance without providing equivalent assurance of risk mitigation.

2.3 The department would benefit from continuing to explore opportunities to increase appropriate, direct communication between assessment officers and brokers, particularly at the point of processing. This includes supporting officers to engage confidently and professionally with external parties, while maintaining appropriate safeguards to manage integrity risks. Strengthening these communication pathways would improve efficiency, reduce rework, and support more consistent application of documentation requirements in practice.

2.4 Perceptions in industry about the approach to compliance for Approved Arrangements Class 19 may be creating a disincentive for use of this pathway.

Section 3 – Internal interactions

3.1 Senior leadership in the assessment areas are supporting and encouraging the use of judgement and a focus on the quality of assessments (rather than time taken) which will positively enhance assessment quality.

3.2 BICON case selection is challenging, and incorrect case selection can create significant risk for some commodities.

3.3 There is a need to strengthen assessment officers' understanding of fraud and the identification of repeat offenders. There should also be further work to support the judgement of assessment officers around risk management rather than pure documentary compliance.

3.4 The current use of multiple systems creates significant inefficiencies as well as a high cognitive load for assessing officers.

3.5 There are risks to the biosecurity system from the predictability of many of the system's processes and the patchy or incomplete verification and assurance regime around document assessment.

3.6 Operational staff feel discouraged from providing feedback due to complexity of process and lack of resolution, resulting in "feedback fatigue." Mechanisms should be simple and allow speedy acknowledgement of concerns.

Key Cause for Concern

The use of documentation is critical for the operation of the biosecurity system. While this review has found there are a number of areas where the way documentation usage operates within the system could be improved, the Inspector-General's key concern is regarding the limited verification and assurance around the use of third-party provided documents. Combined with the predictability of regulatory approaches, this leaves an exploitable hole for bad actors. Beyond that though, there is the possibility of widespread paper compliance – where the required documents are provided but they do not equal actual control of biosecurity risks.

As the CSIRO's 2020 report on the future of biosecurity noted:

> *Australia's strong dependence on international supply chains and the lack of transparency within them can challenge biosecurity preparedness efforts and impede Australia's ability to accurately understand the risks imposed by a given incoming product.*[1]

At present, the biosecurity system uses documentation to try to gain transparency, particularly through the requirements for manufacturers' declarations. But the lack of transparency and the complexity of the supply chains means the department needs to do more than trust that these documents are accurate. Verification is essential to ensuring the effectiveness of documentation. As one discussion of the issues that lead to the prawn white spot outbreak puts it:

> *This [procedures that led to the outbreak] demonstrates a verification deficit: the regulator relied on documentation, importer presentation, sampling events and assumed end-use, but lacked a feedback loop capable of testing whether the system was working where risk would materialise.*[2]

[1] CSIRO, *Australia's Biosecurity Future: Unlocking the Next Decade of Resilience*, p30

[2] David Mackay *Polycentric Prevention and Regulatory Disaster: Lessons from Three Australian Biosecurity Outbreaks*. Forthcoming.

The effectiveness of documentation requirements as a biosecurity control relies on the assumption that the documentation provided by importers and their agents is accurate, reliable and truthfully reflects the underlying conditions, treatments, or processes being declared. However, observations from this review indicate current processes and guidance provide limited support for assessing the authenticity of documentation or verifying whether documentation is a truthful representation of the processes involved in the manufacture, storage and transportation of commodities.

In a media release about alleged raw peanuts being found in Australian shops, the Hon David Littleproud MP suggested importers may be "deliberately miscoding products on customs declarations to avoid biosecurity requirements."[3] While there is no finding that this is the case, and it is possible the reason for these peanuts being in Australia is completely unrelated to documentation, it is notable that a former Minister for Agriculture can recognise a potential hole within the system. On a similar note, the issues raised recently by Four Corners[4] regarding food fraud and labelling demonstrate, again, that without processes of verification, assurance and compliance consumer's ability to trust and rely on what is documented on labels, or elsewhere, is shaky at best. The Four Corners story also highlights a key concern regarding much biosecurity documentation: the complexity of supply chains means importers may struggle to vouch for the veracity of documentation, unless they are held to account.

The challenge of documentation is compounded by the fact the department has no relationship with some of the organisations who provide key documents. Health Certificates and Phytosanitary Certificates can generally be afforded a higher degree of confidence, provided they are genuine, because they are issued by government authorities. Other documents are produced by manufacturers and parties that operate outside the department's direct oversight or reach. The department can audit the approach governments have taken to the issuing of certificates, but it has almost no compliance tools when dealing with the manufacturers who provide goods to exporters. It is notable that because these companies and their actions are not within Australia, it would be nearly impossible to prosecute them for deliberately providing false or misleading documentation. Similarly, as there is not a direct regulatory relationship with the department, there are no administrative sanctions that can be used. It is also unlikely that those who provide the documents to the department (e.g. importers) would be successfully prosecuted, as they could argue they had a reasonable belief the information provided to them was accurate.

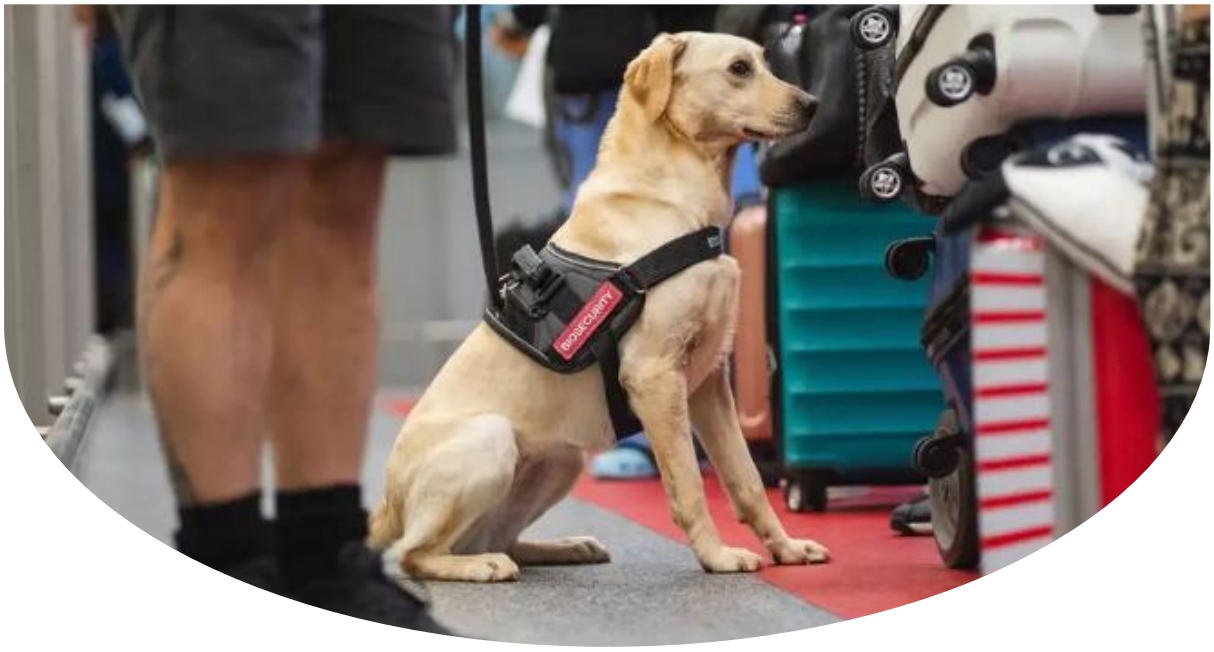
Regardless of the ability to sanction, the fact is that, at present, there appears to be little systematic testing, reviewing or inspecting that could determine whether the documents provided to the department, particularly manufacturers' certificates, are a true and accurate reflection of ingredients and/or manufacturing processes. The predictability of the processes for consignments depending on their declared goods further exacerbates these issues. As accurate documentation is a critical control in managing biosecurity risks, the department needs to urgently consider how to address this gap.

Recommendation 1

The department considers how to improve its assurance and verification processes for documentation to increase confidence that documents accurately describe the contents, ingredients and manufacturing processes of imported goods.

[3] David Littleproud, *Raw Peanut Imports Raise Serious Biosecurity Alarm*, media release, 11 June 2026, David Littleproud MP

[4] Four Corners, *Duped: Food Exposed (Part 1)*



Context

Australia's biosecurity system is often associated with visible frontline activities—detector dogs screening mail and traveller bags, inspection officers at open containers, and questioning at international airports. While these things are an integral part of the system, the majority of the risk assessment depends on routine administrative processes. Decisions about risk are made based on the information provided about goods. Documentation requirements underpin these decisions, quietly shaping how risk is assessed across thousands of consignments each day.

Australia's geographic isolation has long supported strong biosecurity outcomes, but this advantage is increasingly challenged by the rising volume and expanding diversity of imported goods. Global trade, migration, travel, and research activities all contribute to a steady and growing flow of goods entering the country. These range from high-volume routine goods to highly specialised materials and the movement of live animals.

Each of these pathways carries different levels of biosecurity risk, requiring a system capable of managing both scale and complexity.

To keep Australia free from exotic pests and diseases, assessments of incoming goods need to be conducted. The volume of incoming goods and limitations on resources make it infeasible to physically inspect or conduct testing on everything.

The biosecurity system is administered by the Department of Agriculture, Fisheries and Forestry (the department) under the *Biosecurity Act 2015*. Following findings from the Beale review (2008), Australia implemented a risk-based assessment model, where lower-risk goods are subject to reduced regulatory attention. As a result, assessing risk at scale depends heavily on the information provided about goods, with documentation requirements playing a central role in determining how and where regulatory effort is applied.

BICON (Biosecurity Import Conditions System) is the database that sets out Australia's import requirements. It identifies whether goods can be imported and details any conditions that apply, including permits, treatments, inspections and supporting documentation. It is accessible to all participants in the biosecurity system.

Documentation requirements are derived from international agreements, legislative obligations and departmental policies developed by relevant sections. These requirements are primarily communicated through the Biosecurity Import Conditions (BICON) system, which is used by both internal and external stakeholders. For many commonly imported goods, BICON provides standardised import conditions, including the documentation that must be supplied by importers.

While import conditions establish requirements for broad classes of goods, some goods require a more detailed assessment of biosecurity risk before importation can occur. In these cases, prior approval to import must be obtained through an import permit.

For some commodities, permit assessments are relatively standardised. These goods are imported regularly and are subject to established permit conditions that can be applied across multiple consignments and importers. Dairy products are one example.

For other commodities, bespoke import permit conditions may be applied, depending on the circumstances of the particular importer. This is the case for the importation of live animals, such as birds and horses. In these instances, technical and policy officers assess each import permit application, and the pre-border and border requirements may show large variations between individual permits.

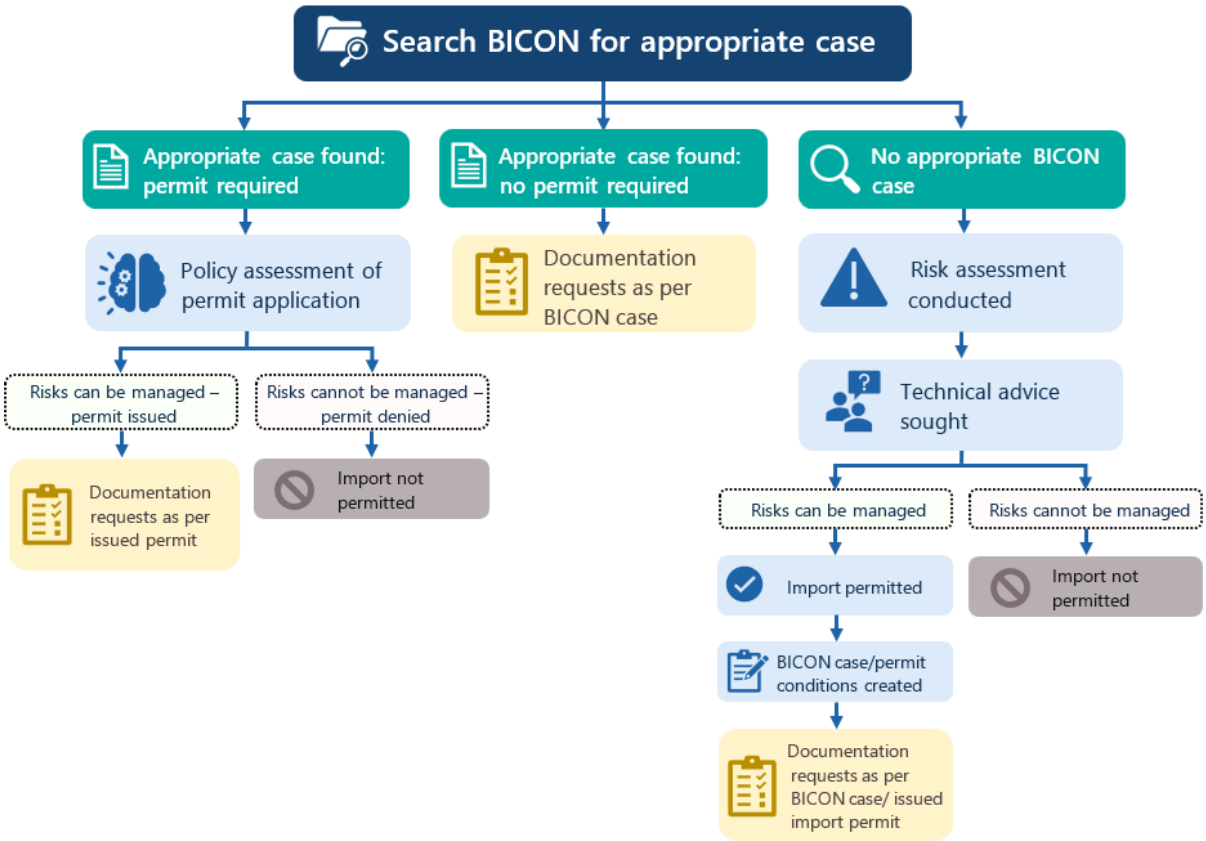


Figure 1 Pathway of documentation requirement determination

Documentation requirements are a critical component of Australia's risk-based biosecurity system. Once established, they are used throughout import clearance processes to inform risk assessment and determine the regulatory actions applied to imported goods.

Once goods are consigned, information relevant to the goods is submitted through import systems, which trigger biosecurity risk profiles and create entries within departmental systems. From this point, there are several pathways through which goods may be cleared: the majority of entries with a biosecurity risk are manually assessed by department officers; certain pathways of goods have directions automatically assigned to an entry; and, in some cases, accredited people are able to clear the goods themselves under an approved arrangement. Goods are then either released or undertake further risk mitigation in the form of inspection, testing or conditions on use within Australia.

For documentation requirements to be effective, they must be defined and communicated in a way that can be consistently interpreted and applied by both external parties and departmental officers. They also need to be verified and assured. Documentation requirements not only support the assessment process but also play a direct role in determining how effectively biosecurity risk is identified, interpreted, and managed. Where documentation requirements are unclear, impractical, or inconsistently applied, this can result in delays, unnecessary administrative burden, and reduced confidence that biosecurity risks are being appropriately managed. As the administrator of Australia's biosecurity system, the department has an important role in ensuring documentation requirements are effectively communicated, consistently applied, tested and verified.

Purpose of this review

The Inspector-General of Biosecurity (Inspector-General) is responsible for reviewing the department's effectiveness in administering biosecurity legislation and standards. This includes assessing the performance of functions, or exercise of powers, by biosecurity officials under one or more provisions in the *Biosecurity Act 2015*.

This review focuses on the use of documentation to assess biosecurity risk in relation to imported goods, recognising its central role in risk-based decision making at the pre-border and border stages.

To examine this issue, the review considered documentation requirements across 3 key areas: how they are developed, how they are experienced by industry, and how they are applied in practice by departmental officers. The review also considered the impacts of those requirements on importers, customs brokers, and departmental assessment and inspection officers.

While aspects of documentation requirements have been considered as part of broader reviews, no previous Inspector-General has examined documentation requirements as the primary focus of inquiry in relation to the biosecurity risk assessment of imported goods. This area has also not been the focus of external audit or review (e.g. ANAO or CEBRA) in recent years.

Initial consultations with internal and external stakeholders indicated strong interest in this topic, with documentation requirements consistently identified as a source of both operational challenge and opportunity for improvement.

Scope and Method

This review examined the role of documentation requirements in the assessment and management of biosecurity risk across the import system.

The review considered documentation requirements across their development, use by industry, and application in practice by departmental staff.

It drew on a combination of:

- consultations with departmental staff across policy, assessment, and inspection functions
- engagement with external stakeholders, including customs brokers and industry representatives
- direct observation of assessment and inspection activities
- analysis of case studies and documentation pathways
- review of department policies, procedures and decision support material relating to document assessment.

Observations and interviews were conducted in person across numerous office locations around Australia. Two *Have Your Say* consultation processes were undertaken (one for departmental staff and one for external stakeholders), through which participants provided feedback through 123 survey responses and 5 written submissions. There were over 60 in-person interactions with staff in different roles in the field, and more detailed follow-up conversations with 4 industry partners.

While the review team observed SAC inspections, it was noted that documentation assessment played a smaller role in this work, so the pathway is not considered in detail. Similarly, while biosecurity officers managing the international mail pathway are required to use BICON to understand requirements, their work has not been considered in detail as part of this review.

The findings presented in this report draw on these observations and consultations, identifying practical opportunities to improve the consistency, usability and effectiveness of documentation requirements as a risk management tool.

Section 1 - Design, Development and Maintenance of Documentation Requirements

As a Member of the World Trade Organization and signatory to the Agreement on the Application of Sanitary and Phytosanitary Measures, Australia develops and applies biosecurity measures within an international framework that requires those measures to be scientifically justified, risk-based and no more trade restrictive than necessary.

The *Biosecurity Act 2015* and associated legislative instruments establish the conditions under which goods may be imported into Australia. These instruments, including the *Biosecurity (Conditionally Non-prohibited Goods) Determination 2021* (Goods Determination), define broad classes of goods and provide the legal basis for applying import conditions.

For many commonly imported goods, conditions are implemented through standardised BICON cases. For goods requiring a more detailed assessment of biosecurity risk, conditions may instead be applied through import permits, which provide a mechanism for tailoring documentation requirements and controls to specific commodities, pathways or importers.

Individual conditions for import are the product of a layered development process involving legislative settings, technical understanding, policy interpretation, and system implementation. An evidence and risk-based approach is taken to developing conditions for import, including documentation requirements.

This process involves multiple teams; generally, a technical team, a policy team and the BICON content change team. These teams usually work in series, rather than collaboratively – once a technical evaluation, usually in the form of a risk assessment, is completed and policy decided, the BICON content change team supports implementation of changes and ensures consistency with the BICON framework and system. For certain commodities, a greater involvement of different teams may be needed. Taking stockfeed as an example, development or change of conditions could involve input from plant, animal and biological technical teams. As a result, the development of documentation requirements is not a single step, but an iterative process that can introduce complexity in how requirements are created, updated, and maintained.

Engagement with operational staff during the development of policies, including any documentation requirements, varies across policy and technical teams. From interviews and observations, staff at operational levels felt removed from the development process. Staff at the Post Entry Quarantine (PEQ) station were most aware of their corresponding policy teams, with the Horse, Bird and Livestock team noted as having the "best practice" in terms of their involvement of operational staff in the development stages and provision of training packages post policy being written.

The effectiveness of documentation requirements depends not only on how they are developed, but also on the supporting guidance, training and decision-support material available to those responsible for applying them. This supporting material plays an important role in promoting consistent interpretation and risk-based decision-making.

Documentation requirements should not remain static once implemented. As they are applied in operational environments, officers may encounter circumstances not anticipated during development, or identify practical challenges associated with their interpretation and application. Effective feedback mechanisms are therefore important to ensure operational experience can inform ongoing refinement of documentation requirements and support consistent risk-based decision-making. Feedback mechanisms employed once documentary requirements have been developed and published are considered in more detail in Section 3.8.

The importance of communication and feedback between operational and policy teams is not a new issue. Recommendation 16 of the 2020 Inspector-General review into the adequacy of the department's operating model called for the department to improve feedback and collaboration between operational, technical and policy teams to support the timely resolution of issues that impede biosecurity delivery and increase residual biosecurity risk.[5]

Normalisation of deviance refers to the gradual process by which departures from rules or standards become accepted as normal practice, particularly when those departures do not immediately result in negative outcomes. Over time, repeated workarounds or minor non-compliances can become routine, reducing sensitivity to risk and increasing the likelihood of more serious failures.
The concept was popularised by sociologist Diane Vaughan in her analysis of the 1986 Challenger space shuttle disaster, where repeated acceptance of known technical anomalies led decision-makers to underestimate risk.

The Inspector-General observed that operational staff strongly felt policy teams placed little value on feedback; they also felt that policy teams rarely engaged proactively with operational staff to obtain it in the first place. Opportunities to improve documentary requirements without increasing biosecurity risk can take considerable time to implement, even where the necessary changes are relatively minor. As a result, operational staff may rely on workarounds or overlook requirements that are difficult to satisfy operationally. This creates additional risk from a regulatory practice sense, as it creates the potential that assessment officers might normalise ignoring or working around difficult requirements, contributing to the broader behavioural phenomenon known as the normalisation of deviance[6].

Ensuring there is a strong link between operational staff and policy-setters should remain a priority for the department. Operational staff understand what is feasible and practical in a way that is difficult for those whose focus is on policy and technical matters. Establishing ongoing, active linkages between these areas during the development of requirements and maintaining those links

[5] Inspector-General of Biosecurity, *Adequacy of the Department's Operational Model*, p12.
[6] Price and Williams, *When Doing Wrong Feels So Right: Normalisation of deviance*

as policy is operationalised is crucial to reduce biosecurity risks as well as regulatory practice risks such as the normalisation of deviance.

FINDING 1.1
There are gaps between policy development and operational implementation that can result in requirements that are impractical to comply with, difficult to verify, and not always aligned to biosecurity risk. There is a need to strengthen the connection between those developing documentation requirements and those responsible for applying them in practice.

1.1 Goods Determination

The Biosecurity (Conditionally Non-prohibited Goods) Determination 2021 (Goods Determination) is a legislative instrument under the Act that sets out which goods may be imported into Australia and the conditions that apply to manage associated biosecurity risks.

The Goods Determination was introduced as a legislative instrument under the *Biosecurity Act 2015*. Its development was intended to reflect the Act's broader design as a flexible and responsive regulatory framework. By enabling import conditions to be set and updated outside of primary legislation, the Goods Determination was designed to provide a "facility for adjusting administrative detail without undue delay, …flexibility in matters likely to change regularly or frequently, and for technical matters requiring ongoing adjustment." [7] Consistent with that approach, the Goods Determination should enable import conditions to be updated in response to emerging risks, new scientific evidence, and operational experience.

In practice, however, the Goods Determination has not delivered on this objective. It appears to have become mired in internal process with few regular updates. The most recent substantive updates occurred in 2022 and were narrow in scope—targeting a single commodity or discrete biosecurity risk (for example, Khapra beetle measures). While several of these targeted updates were made shortly after the instrument's introduction, this was followed by an extended period without any substantive amendment. The next proposed update, currently underway (expected mid-2026[8]), brings together a broad range of changes into a single process. While potentially efficient in some respects, this approach reduces the ability to make incremental, timely adjustments and may contribute to regulatory lag.

The current approach to the updating of the Goods Determination lacks agility. The instrument has not functioned as a "rapid update" mechanism in the way originally intended, resulting in:

- delays in reflecting current risk settings, including emerging risks and operational practice;
- continued reliance on import permits to apply conditions that are stable, well understood, and consistently used; and
- reduced transparency and consistency where conditions are applied through permits or administrative guidance rather than being codified in the Goods Determination, limiting visibility and predictability for stakeholders.

This suggests that, while the Goods Determination framework itself remains sound, its supporting processes and governance arrangements may be limiting its effectiveness. Introducing clearer

[7] Parliament of Australia, *Delegated Legislation*.
[8] Department of Agriculture, Fisheries and Forestry, *327-2025: Proposed Changes to the Biosecurity (Conditionally Non-prohibited Goods) Determination 2021*; *47-2026: Changes to Determinations Made under Section 174 of the Biosecurity Act 2015.* As of publication of this review, these changes are still pending.

processes, structures and triggers for review and updates could help rebalance the system and improve responsiveness without undermining the integrity of risk assessment processes.

In the Inspector-General's view, there are a number of possible approaches to increasing agility and improving the use of the Goods Determination.

Potential approaches include:

Establishing review triggers for permit conditions:
Where import permit conditions remain substantively unchanged and are applied consistently over an extended period (for example, 2 years), this could act as a formal trigger for considering whether those conditions are suitable for inclusion in the Goods Determination.

- This would support a gradual shift from permit-based to instrument-based regulation for stable, well-understood risks.
- It would also reduce administrative burden and improve transparency for importers.

Introducing a regular update cycle
Moving from an ad hoc amendment process to a more predictable update cycle (for example, annual or biannual updates) could improve planning, resourcing, and stakeholder engagement.

- A scheduled process would allow smaller, incremental changes to be progressed more efficiently.
- The need to bundle large numbers of amendments into infrequent updates would be reduced.

Strengthening governance and accountability
Clear ownership and accountability for keeping the Goods Determination up to date as a whole, including responsibility for identifying and progressing amendments, would support more proactive management.

FINDING 1.2
The approach to updating the Goods Determination currently lacks agility, leading to a lack of transparency and an increased reliance on import permits.

1.2 Import permits

Context and system pressure

Import permits are a key documentation requirement used by the department to support the assessment of biosecurity risk for certain goods.

In the 2024–2025 financial year, the department assessed over 26,000 import permit applications. This was a significant increase on the previous year, with application volumes rising by more than 50%[9]. Continued growth in imports to Australia is expected to drive further demand for import permits, should current settings remain the same.

The increasing volume of applications has implications for the department's resourcing, particularly given the time and effort required to assess permits as each is done on a case-by-case basis. While the current approach supports robust biosecurity risk management, in the context of continued growth there is value in considering opportunities to improve efficiency and optimise assessment processes, ensuring the system remains responsive and sustainable.

[9] Department of Agriculture, Fisheries and Forestry, *Annual Report 2024-25,* p50.

Companion animals (cats and dogs) represent the single largest category by volume, reflecting the fact each individual animal imported requires a separate permit. Overall, permits related to animals and animal products are more numerous than those for plant and plant products. There is a notable inconsistency between the Plant and Animal Divisions on a policy decision made with respect to import permits several years ago. This saw the transition of many plant goods to standard BICON cases following large-scale risk assessments, reducing the need for individual permits, as opposed to the continued reliance on permits for animals and animal products. The approach applied in plant programs highlights a potential pathway for reducing reliance on permits where risks are well understood, and similar approaches would be applicable to certain animal-related goods.

Role and intended value of permits

Permits play an important role as a documentation-based control within the biosecurity risk assessment framework. They provide a mechanism for the department to track some higher-risk goods or those requiring more complex assessments, with each permit linked to a specific entity (person or business). The Act also enables the use of fit and proper person provisions, which may be used to prevent individuals with a history of malpractice from importing these types of goods, though in practice the Inspector-General understands these provisions are rarely used.

In addition, permits provide flexibility to implement timely amendments in response to changing risk conditions. For example, in the case of dairy products where foot-and-mouth disease (FMD) emerges in new countries or regions, updating a permit (or a range of permits) can be achieved more quickly than making changes to the Goods Determination.

Operational benefits in practice

For assessment officers, an import permit provides a defined set of approved conditions against which to assess specific goods. Because the conditions have already been considered and approved through the permit application process, assessment officers can have confidence the most appropriate import pathway has been identified. This allows assessment effort to focus on verifying compliance with the approved conditions, reducing a potential source of error and streamlining the assessment process.

The Inspector-General also noted during fieldwork the import permit application process is often educative for importers, with departmental staff advising and reminding importers of post-border requirements such as making bookings to facilitate inspections and post entry quarantine facility requirements. The process also allows a back-and-forth conversation around requirements which could create challenges if they occurred once goods had already landed in Australia. Finally, in more complex permits in particular, technical officers can seek more detailed evidence around manufacturing processes and ingredients as a result of their subject matter knowledge.

Emerging limitations and risks

Complexity and interpretability

The individualised nature of permits can introduce issues in how they are interpreted and applied. During observation of assessment activities, it was noted some entries with import permits appeared to introduce more questions and delays. While this may partly reflect deeper scrutiny of higher-risk goods, it was generally due to officers needing to interpret what a permit was asking, or whether statements on supporting documents aligned with the requirements.

Specific examples highlight these challenges. In one case, the permit included a long list of "and/or" statements without direction to select *only* relevant options, resulting in the entire list being copied into the documentation provided to the assessment officer. This created confusion, as some of the included statements were contradictory when considered alongside each other. This in turn, raised questions about the veracity of the information contained in the accompanying health certificate.

In another instance, ambiguity arose with a permit that introduced a list of standards using the term "i.e.". The accompanying documentation referenced different standards that fit the general requirement but did not match those listed exactly. This created uncertainty as to whether the listed standards were intended to be mandatory requirements or simply examples of standards that could satisfy the broader condition. It was ultimately unclear to the assessing officer how the original author intended the condition to be interpreted, leading to an extended discussion with a team leader. This demonstrates how seemingly minor drafting choices can lead to inconsistent interpretation, application and delays.

Administrative burden and inefficiency

This lack of clarity contributes to inefficiency in the assessment process and reduces the effectiveness of permits as a documentation tool for supporting clear and consistent risk assessments. Time that would otherwise be spent verifying compliance is instead used to interpret permit conditions and resolve uncertainty. The variability between permits increases the cognitive load on assessment officers, particularly where permit drafting approaches lack standardisation.

A further inefficiency arises where import permit requirements have become effectively standardised. In these cases, permit assessments often involve repeatedly applying the same conditions to goods with well-understood risk profiles and limited variation in production systems, end uses or risk management measures. While permit assessments remain important where complex risks or offshore controls require detailed consideration, many standardised pathways result in broadly similar permit conditions regardless of the applicant. In many instances, these conditions would be better incorporated into the Goods Determination, reducing the need for repetitive permit assessments. However, as noted, the current approach to updating the Goods Determination limits its ability to perform this role effectively.

In some cases, the use of import permits also raises questions about whether the resulting regulatory effort is proportionate to the risk being managed. One example observed involved a consignment of confectionery products, only one of which required an import permit because it

contained 12% dairy. Despite being part of a broader consignment of very similar products, this item was subject to an additional layer of administrative and regulatory process. It seems unlikely that the risk profile of this product was so inherently different from that of the other goods within the consignment as to justify that distinction. This suggests that, for some goods, the requirement for an import permit may go beyond what is reasonably necessary to manage biosecurity risk.

Time-bound controls and their calibration

Permits are issued with expiry dates that appear to follow established practice, however, the rationale for these durations is not clearly documented or externally transparent. Review evidence suggested that for processed goods, 2-year permits are used as this is considered to be the period over which it is likely that processing steps and procedures may have changed sufficiently to warrant reassessment. On the other hand, permit durations of 4 or 5 years are generally applied to less product-specific permits. Although these timeframes are applied with a degree of consistency, it is not always clear how decisions are made regarding permit duration or how judgements are reached about the stability of the associated production processes and risk controls. This can create a perception that expiry settings are based on convention rather than a clearly articulated, risk-based approach.

Import permit assessors noted that permit renewals often involve verifying the currency of supporting documents, mostly because applicants resubmit the same documentation provided in previous applications. This suggests there may be scope to better align permit validity periods with the likelihood of material changes to the information on which the permit assessment is based.

Permit validity periods also have practical implications for compliance and administration. Where permits expire more frequently than necessary, importers are required to undertake additional renewal activities and may be more likely to inadvertently operate under an expired permit. The most common reason goods enter Australia without a valid permit appears to be that a previously valid permit has expired. In some circumstances, these goods may still be permitted entry into Australia, as discussed in the ‘Conditionally non-prohibited goods arriving as cargo without an import permit' section below.

While the removal of expiry dates on all permits could reduce the resources required to repeatedly assess often identical documentation at fixed intervals and reduce the reliance on the process of assessing goods once they have already arrived, expiry dates can serve an important function within the system, particularly for more complex or non-standard permits. They create a mechanism for periodic review and require applicants to reassess and resubmit information, helping to ensure permit conditions remain aligned with manufacturers’ current processes and risk settings, rather than persisting unchanged despite potential shifts in risk or practice.

An example observed during the review involved the permit application for a veterinary therapeutic. Upon expiry of an existing permit, the importer applied for a new one. The importer had held permits for the same product for a significant period; however, they advised during the assessment process that the product had not been imported for over 10 years. Based on information provided in the permit application, a lack of history of use in Australia, as well as a change in a critical biosecurity risk mitigating process assessed in the previous risk assessment, the assessing officer sought additional information to satisfy them that the identified biosecurity risks had been managed. This example illustrates how permit expiry dates trigger the review of manufacturing processes which are critical in managing biosecurity risks. If the original permit had not expired, the department may not have been made aware of sourcing or manufacturing amendments where critical biosecurity risk mitigating processes had changed, therefore altering the risk profile of the product.

This highlights a key tension. It is possible some permits could have much longer durations, or even no expiry date, particularly where the production processes are straightforward. However, removing the expiry mechanisms altogether could create a risk that some permits remain in place despite changes to processes, systems, or risk profiles. This suggests a need for a deliberate and risk-based approach to setting permit durations, rather than a uniform or implicitly determined timeframe, ensuring documentation used in risk assessment remains current and reliable.

Conditionally non-prohibited goods arriving as cargo without an import permit

The arrival of a consignment after the expiration of a permit is not the only time when goods arrive without a valid permit, despite this being a legislative requirement. It is an offence under subsection 186(1) of the Act to bring or import goods into Australian territory if the goods require an import permit and arrive without a valid permit. However, current policy allows the importers of these goods to have a biosecurity risk assessment undertaken once goods are onshore. The departmental approach would appear to be that regulatory compliance and biosecurity risks are treated as 2 separate but parallel considerations.

Prior to July 2026, goods arriving without a valid import permit were managed through the exceptional circumstance policy. This process was administratively burdensome for the department, requiring sign-off by multiple executive staff across different operational and policy areas. Under the old policy, those who applied for exceptional circumstances routinely had their goods released and no prosecutions or other regulatory compliance activities were conducted. The Inspector-General was not provided with an example of goods being refused entry under the exceptional circumstance policy process.

Under the new *Conditionally non-prohibited goods arriving as cargo without an import permit* policy, it appears as though in every instance of goods arriving as cargo without a valid import permit, the person in charge of the goods is offered the opportunity to destroy the goods, export the goods or have an onshore biosecurity risk assessment conducted. This policy and the related processes are still too new to fairly assess how frequently they will be utilised or the extent of additional burdens

they might unintentionally place on staff. It is important to note that an onshore risk assessment is not a guarantee that goods will be released to the importer and does involve additional costs and delays.

In the Inspector-General's view, this process entirely undermines the use of import permits. It is almost a codification of the normalisation of deviance – statements clearly note that it is illegal to import these goods without an import permit, yet this requirement is essentially ignored. Further, if consignments are routinely released after they have arrived in the country without a required import permit, it creates the suggestion that standard conditions through the Goods Determination and BICON would be adequate to manage the risks presented.

The process as currently set out does not provide a significant disincentive for non-compliance. The policy could be strengthened by ensuring that it is not seen as a business-as-usual approach for importers. As the costs of keeping goods in approved arrangements is not insignificant, making sure that these types of assessments were considered last and are not prioritised would likely provide a cost impact on non-compliant importers. Further, repeat offenders should be identified and potentially issued with warning notices or similar. It is not clear to the Inspector-General that there is currently any tracking of, or follow up, if importers or others have breached this legal requirement on multiple occasions.

Implications for system design

These observations highlight opportunities to strengthen the effectiveness and usability of permits within the broader biosecurity system. While permits remain a valuable tool for managing those goods with higher-risk or more complex risk assessment processes, there is a need to ensure they are clear, consistent, and practical to apply in an operational setting. At the same time, it would increase efficiency within the system to move standard, regularly used and relatively stable permits into the Goods Determination through regular updates or, alternatively, to explore whether some of these goods could be moved to non-expiring or very long-term permits.

Improvements could include considering greater standardisation in how permits are drafted, as well as mechanisms to reduce ambiguity and improve interpretability. The findings also reinforce the value of involving operational staff earlier in the permit development process. Some form of operational checking prior to issuing permits could help ensure conditions can be readily understood and applied during assessment.

Taken together, these reforms would support a more efficient and consistent system, while maintaining the flexibility and risk management strengths that permits provide. At the same time, permits should be retained for goods where it is possible the process will require an additional risk assessment or the risk is complex to determine.

FINDING 1.3

There is significant room for improvement in the efficiency and effectiveness of the use of import permits by the department.

Recommendation 2

The department considers the design and use of import permits with a view to reducing administrative burden, improving the clarity and usability of permit conditions, and ensuring permit requirements remain proportionate to the biosecurity risks they are intended to manage.

1.3 BICON Conditions

Managed by the department, BICON details import conditions for more than 20,000 commodities. It identifies whether goods are permitted for import and any associated requirements, including permits, treatments, inspections and supporting documentation. BICON was rolled out in October 2015 and replaced the department's legacy Import Conditions (ICON) database as part of a broader modernisation of import permit and import conditions services.

The import conditions detailed within BICON, and associated risk management measures (including documentary requirements), have been developed by different policy and technical areas operating within varying risk and regulatory contexts. This may help explain why import conditions that appear to address similar biosecurity risks can have substantially different evidentiary requirements.

One instance raised with the review team is in relation to evidence of freezing. With frozen fruit, evidence of the product being frozen can be provided on 9 different documents[10], whereas for frozen finfish the same assurance is only accepted through a "freezing declaration issued by the entity storing the goods in a refrigerated unit"[11]. While the Inspector-General was unable to conduct a comparison study across all BICON cases, in person discussions and responses to the survey indicate that this is not an isolated case.

It is understandable inconsistencies may emerge in a system as large and complex as BICON. As the system does not provide clear rationales for these differences, stakeholders may question why certain forms of evidence are accepted for one BICON case but not in another. Providing greater transparency regarding the basis for evidentiary requirements could improve stakeholder confidence that differences reflect the management of biosecurity risk. Without that transparency, it can be difficult to determine whether variations in evidentiary requirements are intentional and risk-based, or the result of inconsistencies in the development and maintenance of import conditions.

The department has a general policy for the development and amendment of BICON cases but there is no generalised formal cycle for reviewing import conditions and the documentation requirements associated with them. While some policy teams may have their own specific policies, it does appear the majority of BICON cases are set and are not reassessed unless there is some external trigger, such as a change in biosecurity risk level posed by the goods or feedback from stakeholders (both internal and external). This reactive approach can result in requirements remaining in place longer than necessary, even when there is evidence that they may be unclear, impractical, or no longer proportionate to the level of risk.

The BICON issues register provides a mechanism for operational staff to lodge issues encountered while working with the system. However, awareness and use of the register is inconsistent, with usage largely concentrated among particular locations and individual staff members.

While there are a number of examples where issues have been raised and resolved through this process (79 issues completed), a significant number remain outstanding (38 approved but not yet completed), including some raised as early as 2023. These delays limit the effectiveness of the

[10] Department of Agriculture, Fisheries and Forestry, Biosecurity Import Conditions System (BICON), frozen fruit import conditions, accessed 11 June 2026.
[11] Department of Agriculture, Fisheries and Forestry, Biosecurity Import Conditions System (BICON), Fish including fish caviar, fish roe, fish viscera and fish maw (excluding salmonid fish) import conditions, accessed 11 June 2026.

register as a feedback mechanism and reduce confidence that identified problems will be addressed in a timely manner. Over time, this may contribute to feedback fatigue among operational staff.

This should not be taken as a reflection on the BICON content change team. In conversations with department staff, much of the delay relates to two factors: broader resourcing constraints across the process, including within policy teams and the BICON content change team, and the complexity of the system that sits behind what is visible to users. Updating a BICON case is not a simple process of changing wording or adjusting links; it often involves multiple iterations and consultation with policy and technical teams to ensure risks continue to be appropriately managed. There was also anecdotal evidence that operational considerations are not consistently incorporated into decision-making by policy and technical areas, which can further contribute to delays in resolving identified issues.

FINDING 1.4

Documentation requirements within BICON would benefit from a more structured and proactive approach to review and maintenance. Clearer mechanisms for identifying, prioritising and progressing updates, alongside greater consistency in the application of risk-based principles, would help ensure requirements remain fit for purpose, proportionate to risk, and practical to apply in an operational setting.

In addition to these inconsistencies and processes, a significant proportion of BICON cases rely on manufacturers' declarations as a form of assurance that treatments have been conducted or conditions have been met. While these documents provide a flexible and readily available form of evidence, the review identified concerns regarding their reliability and evidentiary value in some contexts. The Inspector-General considers these concerns to be well founded. Further discussion on the use and limitations of manufacturers' declarations is provided in Appendix 2.

1.4 Operational input to development of conditions

While there are a range of approaches taken to developing conditions for BICON and import permits, there was a clear perception by frontline staff that their input was not a key component of the development process. Operational staff described being involved at later stages in the process, generally as a final step of "feedback" before something is published. Staff interviewed reflected on receiving, or being aware of other staff receiving, what appeared to be final draft copies of policies

for comment. None of the staff interviewed were able to identify examples of operational staff being involved in working groups, workshops or other forums during earlier stages of development. While this does not necessarily indicate such involvement does not occur, it suggests these processes may not be visible to, or well understood by, operational staff.

Among survey respondents, 62.6% indicated that staff with operational experience are included in decisions about documentation requirements to either a small extent or not at all. While these responses reflect respondents' perceptions and may not be representative of all staff, they suggest some concern regarding the extent to which operational experience informs documentation requirement development.

An area where this is most apparent is within the travellers' space where requirements for documentary evidence do not always consider the realities of the operational environment. For example, if a passenger presented a 500g commercially packaged and prepared bag of polenta, the biosecurity officer would follow the BICON case *processed grains and seeds for human consumption*. One of the import conditions is that the goods must be for human consumption.

The statement from the BICON case is:

> *The product must be for human consumption.*
> *To demonstrate compliance with this requirement you must present the following on a Manufacturer's declaration, Supplier's declaration, Exporter's declaration or Food product label: A statement that the consignment is for human consumption.* [12]

The reality is that many labels do not include this statement, and the passenger is unlikely to have access to the supplementary documentary evidence required. From a practical risk-assessment perspective, the combination of retail packaging, quantity, presentation and the ability to question the traveller may provide very strong evidence regarding the intended end use, potentially stronger than a literal statement on a label, which history shows is not always sufficient as evidence of end use (e.g. issues acknowledged around labelling on prawn products in 2017).

In situations such as this, the focus shifts from answering the underlying risk question to determining whether a particular document is available. Inspection officers may find the evidence available to them provides a strong indication the product is intended for human consumption yet still be unable to satisfy the documentation requirement as written.

Here the documentation requirement and the risk assessment do not necessarily point to the same outcome. Inspecting officers must then decide whether to follow the requirement as written or rely on their professional judgement of the available evidence.

Where these circumstances occur repeatedly, there is a risk of normalisation of deviance. Officers may develop workarounds that allow them to achieve what they consider to be the appropriate risk outcome, despite those workarounds departing from the documented requirement. Over time, departures from the requirement can become accepted practice, particularly where they are seen to produce reasonable operational and biosecurity risk outcomes.

This can weaken the authority of documentation requirements. Officers may continue to recognise a requirement states that documentary evidence "must" be provided, but repeated exposure to circumstances where the requirement appears impractical or misaligned with operational realities

[12] Department of Agriculture, Fisheries and Forestry, *Biosecurity Import Conditions System (BICON)*, BICON case: *Processed grain and seed products for human consumption - Other — Goods arriving as mail or passenger baggage — Packaged in bags less than or equal to 25kg*, accessed 11 June 2026.

can lead to the view that "must" is not always absolute. The risk of this is not necessarily the release of higher-risk goods, but that officers may become less likely to recognise situations where documentary evidence is genuinely necessary to support the assessment of biosecurity risk.

While this example relates to a specific operational setting, it was not the only instance identified during the review where documentation requirements appeared to be misaligned with the environments in which they were intended to be applied. Similar themes emerged across interviews, observations and case studies, suggesting consideration of operational realities during the development of documentation requirements warrants further attention.

The interaction of documentation requirements, import permit conditions and operational processes can, in some cases, result in system-wide inefficiencies and outcomes that are not clearly aligned to biosecurity risk. These issues are compounded where requirements are not reviewed prior to implementation and become difficult to operationalise or verify in practice.

The Singapore seals case study illustrates how a single documentation requirement can drive ongoing non-compliance, increase administrative burden, and deliver limited biosecurity value.

Case Study – Singapore Seals for companion animal imports

For the importation of companion animals (cats and dogs), Singapore is classified as a Tier 2 country on the basis it is rabies free. A standard condition on import permits for companion animals from Tier 2 countries is that transport crates must be sealed, and the seal number recorded on the official health certificate issued by the exporting country.

Following a recent update to Singapore's health certificate, the field for recording the seal number was removed. While the department has no control over how other governments design their certificates, a review of their own processes can be undertaken. The import permit condition requiring the seal number to be recorded on the health certificate has remained unchanged. As a result, every consignment of companion animals arriving from Singapore since that update has been non-compliant with Australian import requirements.

At the post entry quarantine facility, where companion animals are brought to complete their quarantine period, documentation is reviewed by specially trained assessment officers. In addition, a proportion of compliant documentation is subject to review by onsite veterinary officers as part of assurance processes. Where an assessment officer assesses documentation as non-compliant, it must be referred to a veterinary officer for further consideration. Because the absence of a seal number now affects all consignments from Singapore, each case has required escalation.

A tracking tool implemented by the veterinary team identified approximately 9 full days of veterinary officer time were spent reviewing documentation from Singapore over a 12-month period. This effort was required to manage what is, in effect, a systemic documentation issue rather than a case-by-case biosecurity concern. While interim process changes have been introduced and policy areas advised, the core issue remains unresolved—that is, the persistence of an import permit condition that cannot be met in practice.

The requirement itself appears misaligned with the actual risk profile. The purpose of applying a seal to a crate is to mitigate the risk of animals being exposed to rabies during transit, particularly where they may pass through higher-risk (Tier 3) countries. However, companion animals exported from Singapore always travel to Australia on direct flights. In this context, the likelihood of animals being substituted, coming into contact with other animals, or experiencing a change in health status during transit is negligible. As such, the practical biosecurity value of requiring seal numbers for these consignments is unclear.

The issue with Singaporean health certificates is just one example of how documentation requirements, when not grounded in operational input, can be impractical to comply with, difficult to verify in practice, and not clearly aligned to biosecurity risk.

Rather than strengthening risk management, such requirements can generate ongoing non-compliance, create the risk of normalisation of deviance, increase administrative effort, and divert operational resources away from higher-value activities. This reinforces the need for documentation requirements to be designed with greater consideration of their operational application and intended risk outcomes.

FINDING 1.5
Given operational staff have experience in the interpretation and application of requirements, their involvement is critical to ensuring documentation requirements are clear, practical, and aligned with operational realities. Early and meaningful engagement with these staff potentially through the use of multidisciplinary teams to develop requirements, rather than relying solely on post-development feedback, would support the development of more effective and implementable requirements. Further, timely responses to frontline feedback should be a priority.

Recommendation 3

The department must do more to ensure there are active and ongoing links between those developing import conditions and operational staff. These links are needed to ensure effective feedback loops for information and a commitment to actioning feedback. It is critical that technical and policy staff understand operational realities. These links need to go beyond the BICON issues register and could include approaches such as the use of multidisciplinary teams for the development of import conditions, staff exchanges between areas and regular face-to-face meetings at APS levels.

1.5 Clarity and interpretability of requirements

Observations across both import permits and BICON conditions indicate where requirements lack clarity, they give rise to uncertainty in how they are interpreted and applied. This can result in assessment officers needing to make judgement calls about the intent of a condition, or whether supporting documentation sufficiently meets the stated requirements. Interviews and survey responses indicated variation in how officers approach this task.

> *There appears to be inconsistency in how officers interpret statement requirements under BICON. In some cases, statements are being assessed very literally, with an expectation that wording must match exactly when not required to be word for word—particularly when not presented in inverted commas.*
> *However, this strict, word-for-word approach may not always align with the intended purpose of the requirement.* [13]

This variation indicates a tension between prescriptive and judgement-based approaches to assessment. Where requirements do not clearly articulate how they are intended to be applied, officers may default to either strict wording checks or broader interpretation of intent, resulting in inconsistent practices and outcomes. This issue is compounded when requirements cannot

[13] Response to internal survey

practically be met, such as in the airport environment (example provided above in section 1.4), and officers must choose between making a risk-based assessment or a BICON based assessment.

> *Some officers are willing to look at the bigger picture of the biosecurity risk for the commodity (i.e. accepting a 100% synthetic goods disclaimer on an invoice) whereas others will follow BICON stringently and request a manufacturers declaration with specific statements that follows all of min docs policy.*[14]

This inconsistency in assessment can create challenges for industry stakeholders. Brokers reported situations where equivalent submissions for similar goods were assessed differently, with some consignments released on the basis of the documentation provided while others were subject to further questions or requests for additional supporting material. Where requirements are not clearly expressed or are interpreted differently in practice, there can be misalignment between what is requested, what is actually needed and what is provided. This can result in additional queries, delays and rework for both industry and the department.

Data provided by the department indicates documentation-related issues contribute to processing delays in a subset of cases, although their precise impact cannot be fully quantified. This is consistent with staff feedback, which suggests documentation issues add additional time to assessments, often several minutes or more per transaction. In some cases, this process requires the submission of additional documentation and a subsequent reassessment, which may be undertaken by a different assessment officer, further extending overall processing time.

Clarity of requirements is therefore critical to ensure consistent and efficient assessment outcomes. Where requirements are clearly expressed and aligned with how documentation is produced and used in practice, they are more likely to support consistent decision-making by both industry and assessment officers. As noted previously, effective feedback mechanisms between operational staff and those responsible for drafting requirements are important for identifying ambiguities and ensuring requirements remain fit for purpose.

In the view of the Inspector-General, good regulatory practice would see officers using judgement to determine whether evidence provided in documentation meets the requirements of BICON, or, more to the point, manages the biosecurity risk of the commodity. Officers should be trained, empowered and encouraged to think about evidence and risk, rather than requiring strict word-for-word statements on documentation.

1.6 Timing and structural alignment of documentation requirements

Feedback from stakeholders indicated certain operational arrangements, including under-bond movements and deconsolidation pathways, allow goods to be handled and transported prior to documentation being lodged or assessed. Departmental data indicates that around 4.5% of under-bond movements occurred prior to the lodgement of a full import declaration in 2024-25, although

[14] Response to internal survey

this figure does not indicate the biosecurity risk associated with those movements. Stakeholder feedback and departmental records indicate that, in some cases, higher-risk goods from within consolidated consignments may be moved to other locations before a biosecurity assessment has occurred, which can reduce the visibility of those goods and their movement pathways prior to assessment. Where biosecurity concerns are detected after goods have been transported, additional effort may be required to establish movement pathways, verify handling arrangements, and determine the scope of any response activities.

While available evidence suggests these arrangements affect a relatively small proportion of goods movements, they highlight a broader limitation in how documentation-based controls operate. Where assessment of associated documentation occurs only after goods have been transported between locations, the ability of those requirements to support timely risk identification and intervention may be reduced. In these circumstances, documentation requirements are used to support assessment after goods have already moved through parts of the supply chain, reducing their effectiveness as a preventative control.

These observations highlight the importance of considering not only the content of documentation requirements, but also how they align with the timing and structure of the import pathway, to ensure they operate effectively as a control on biosecurity risk.

1.7 Decision support material

Decision support material and training play an important role in supporting the consistent interpretation and application of documentation requirements as a key control within the biosecurity system.

Feedback from surveys and interviews indicated initial training was generally perceived as useful; however, it is heavily concentrated at the commencement of an officer's assessment role. During this period, staff are required to absorb a large volume of information, often without the context of day-to-day operational practice. This limits the extent to which training can be effectively retained and applied once staff transition into business-as-usual activities, including the assessment of documentation against import conditions.

> *No one wants to appear like they don't know what they are doing, especially if they are signed off on everything, however regular training would reenforce everything. I would love to go back and do parts of the initial training again now that I have real world experience to reenforce what I do know and then pick up things I may be doing wrong, miss or don't understand.* [15]

This issue is particularly evident among staff in roles where documentation assessment is not a primary function, such as traveller operations. These staff reported feeling less prepared to assess documentation and less confident in interpreting requirements, reflecting reduced exposure during both training and day-to-day activities.

A number of staff identified a need for ongoing or refresher training to reinforce key concepts over time. One stakeholder noted its organisation addresses this need through mandatory annual Brown Marmorated Stink Bug (BMSB) seasonal training for relevant staff. The department also provided assessment officers with 2 targeted information sessions for the 2025-26 season, covering both the policy context and practical guidance for assessing BMSB-related entries. However, participation

[15] Response to internal survey

does not appear to have been mandatory, despite recordings being made available. This may help explain why some staff reported that they had not received any targeted training.

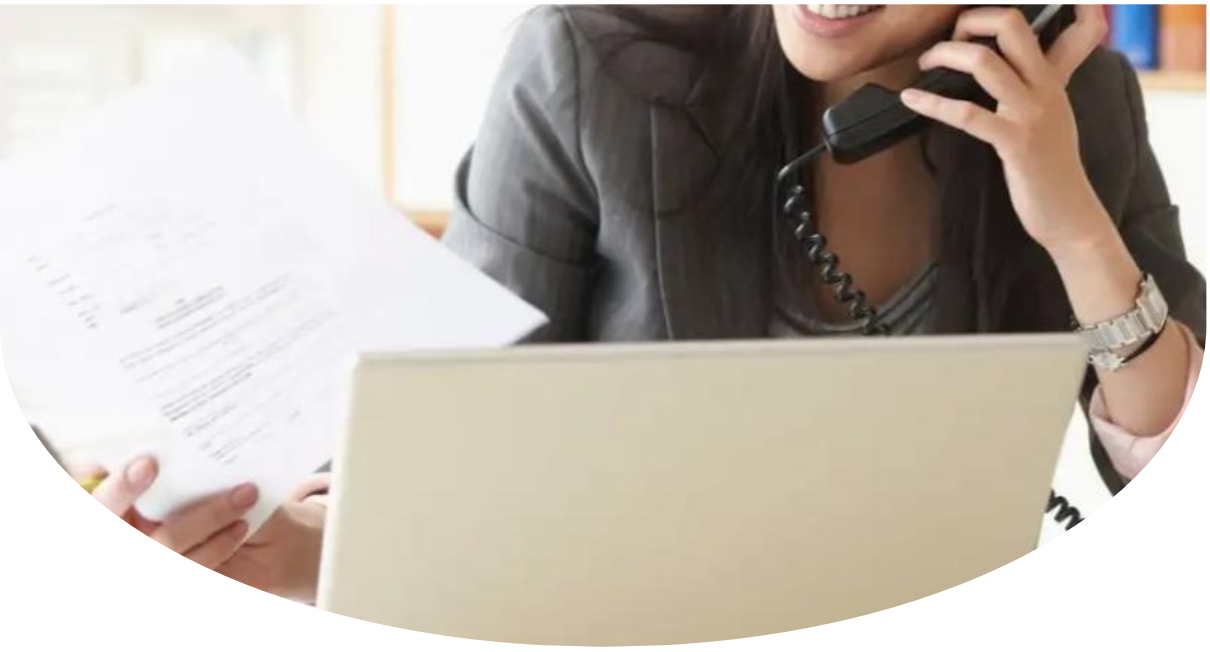
Observations of assessment activities also suggest decision support materials are not consistently used in practice. Officers were more likely to seek guidance from colleagues than refer to work instructions. This has direct implications for how documentation requirements are applied.

The primary work instruction for document assessment for imported cargo was last updated 10 years ago to reflect the introduction of the *Biosecurity Act 2015*. It is the Inspector-General's belief this document is not fit for purpose. One reason for this is the work instruction does not recognise manufacturers' declarations as supporting documents or provide guidance for their assessment, even though they represent a significant proportion of the documentary evidence requirements in BICON. It was observed, however, that assessment officers did have a strong understanding of the *Minimum documentary and import declaration requirements* policy requirements and applied those consistently when assessing applications.

A further example relates to the assessment of non-genuine documents. *The document assessment for imported cargo* work instruction directs officers who suspect a document may not be genuine to refer to a different work instruction. However, the most current guidance on assessing non-genuine documents is contained in a separate Operational Staff Notice (OSN), with no reference to this notice in either work instruction. While the use of an OSN may be appropriate as an interim measure, this notice has been in place for more than 12 months and has been extended on 4 occasions. The continued reliance on a long-standing interim notice means officers must have prior knowledge of the OSN to locate the current process. In the Inspector-General's view, staff should be able to locate current operational guidance through the department's primary decision-support materials without needing to rely on awareness of separate notices for long term issues.

While the Inspector-General has indicated decision support material will be examined in greater detail in a future review, these observations highlight a number of immediate issues relevant to the scope of this review. In particular, they suggest current training and decision support arrangements may not be sufficiently supporting the consistent, efficient, and risk-based interpretation and verification of documentation requirements in practice.

FINDING 1.6
Assessment officers would benefit from additional support provided in refresher training and/or better up-to-date work instructions.



Section 2 – External interactions

Interaction with the department begins at the point an importer seeks to bring goods into Australia. Under legislation, the importer is responsible for undertaking due diligence to understand the goods being imported and identifying applicable conditions and documentation requirements early in the process. In practice, many importers rely on customs brokers and freight forwarders to fulfil these obligations on their behalf.

Customs brokers are typically engaged by importers to lodge import declarations through the Integrated Cargo System (ICS) for commercial goods. These electronic declarations describe the goods in a consignment using information sourced from commercial documentation and are linked to cargo reports submitted by carriers within the ICS.

All cargo declaration information reported to the ICS is subject to automated risk assessment processes administered by the department. These processes identify goods, packaging, and/or transport pathways that may present a biosecurity or imported food concern. To manage risk at scale, the ICS applies a suite of profiling tools, including Cargo Risk Assessment profiles, Community Protection (CP) profiles and lodgement questions. CP profiles use tariff classifications provided in the import declaration to identify goods that may require further assessment.

For goods associated with tariffs that indicate an elevated biosecurity risk, the system automatically refers consignments to departmental systems for intervention. Where tariff information alone is insufficient to determine risk, CP profiles prompt users to answer targeted community protection questions during lodgement. Responses that meet predefined high-risk criteria trigger an automatic referral for further assessment.

For example, the use of a tariff code for fencing material may prompt questions such as whether the goods are used or second-hand, or whether they contain wooden components. An affirmative response indicates the goods meet high-risk criteria and results in the consignment being referred to the department's assessment systems.

Together, tariff classifications, risk profiles, and responses to lodgement questions enable the system to identify consignments of concern and determine the appropriate assessment pathway.

Approved arrangements class 19 allow an accredited person, such as customs brokers, to undertake certain biosecurity assessment functions on behalf of the department for eligible goods. These arrangements are intended to support more efficient processing while maintaining appropriate biosecurity controls.

Class 19.1 non-commodity for containerised cargo clearance

- Applies to assessment of non-commodity concerns e.g. packing material and containers
- Focuses on compliance with broader regulatory or system requirements rather than specific goods

Class 19.2 entry processing for commodities

- Applies to assessment of selected commodity types
- Accredited persons assess documentation and determine outcomes for eligible goods without routine departmental assessment

For some eligible commodity groups and tariffs, consignments may be assessed by accredited persons under an approved arrangement class 19.2[16]. In this circumstance, the accredited person assesses the consignment and supporting information to the same requirements as a departmental biosecurity officer would. Where consignments are assessed as not meeting biosecurity requirements, they are either referred to a biosecurity officer for further assessment or, depending on the scenario, an outcome may be applied that provides direction for the management of the biosecurity risk (e.g. an inspection). Under this arrangement, documentation is not lodged to the department unless the consignment is selected for verification.

These processes provide a structured pathway for the identification of potential biosecurity risk within a consignment. However, once a consignment enters the assessment stage, the effectiveness of this framework relies on how importers and brokers interpret requirements and provide supporting documentation through departmental systems. Evidence from this review indicates this is not consistent in practice. Variability in how external parties understand biosecurity risk, compile and access evidence needed to demonstrate compliance and interpret documentation requirements can create challenges for assessment officers. This variation influences how documentation is prepared and submitted, and in turn affects the efficiency and consistency of assessment outcomes.

The following sections examine these issues in more detail, focusing on how external stakeholders experience and respond to documentation requirements, and what this means for the effectiveness of documentation in supporting consistent, risk-based decision-making.

2.1 Variability in broker capability and practice

During the research for this review, assessment officers consistently identified documentation preparation and submission practices as having a significant impact on the efficiency of the assessment process. For simplicity, subsequent references to brokers reflect their predominant role in preparing and lodging documentation, although these functions may also be undertaken by importers or other nominated representatives.

Differences in documentation preparation and submission practices reflect variations in experience, familiarity with commodities, and the organisational practices of customs brokers and importers. At one end of the spectrum are those who are experienced and proactive in how they manage documentation requirements and supporting documents. These brokers work closely with importers to obtain the information needed to meet departmental requirements and submit documentation in

[16] Department of Agriculture, Fisheries and Forestry, *Approved Arrangement Class 19*.

a structured and complete format. One brokerage described their approach as seeking to 'tell a story with the documents submitted'[17].

Some brokers work within a relatively narrow range of commodities and, over time, develop a high level of expertise in specific product types. This familiarity extends to detailed knowledge of relevant BICON cases and permit conditions, which they incorporate into their processes through the use of checklists, templates, and client guidance. In these cases, documentation is more likely to be relevant, structured, and aligned to the specific biosecurity risks being assessed, supporting more efficient assessment outcomes and reducing the need for further departmental intervention.

In contrast, brokers with limited experience or familiarity with biosecurity requirements may have greater difficulty interpreting documentation requirements and identifying the evidence needed to demonstrate compliance. This can affect how documentation is prepared and submitted, and the extent to which it aligns with the intent of the relevant requirements, often resulting in additional effort during departmental assessment to interpret documentation and resolve outstanding issues.

One consequence of this is the submission of large volumes of documentation with limited filtering or consideration of relevance. Assessment officers described instances where extensive material was provided without clear alignment to the specific biosecurity risks being assessed. In one case, a single full container load consignment of 13 lines included 36 documents across 21 PDFs, resulting in the initial documentation assessment exceeding 15 minutes for what should have been a simple process and would have taken around 5 minutes if the paperwork had been presented more thoughtfully. Where documentation is not targeted to the relevant risks, additional time is required to locate and assess key information, extending processing times and increasing costs for importers.

A separate but related issue arises where insufficient documentation is provided. In some cases, submissions may be limited to minimal documentation, such as an airway bill, without the supporting information required to demonstrate compliance with biosecurity requirements. This can necessitate further requests for information or physical inspection of goods. In instances where appropriate documentation could have supported clearance, this results in avoidable use of departmental resources and delays in processing.

Despite this variation, the system currently applies requirements in a largely uniform way across brokers. Existing policies and processes do not provide a mechanism to differentiate based on demonstrated capability or compliance history. As a result, there is limited opportunity to recognise or leverage the practices of brokers who consistently meet requirements, or to tailor oversight in a way that reflects differing levels of capability.

This results in inefficiencies across the assessment process, as variation in capability and practice, drives rework, delays, and avoidable use of resources for both industry and the department

2.2 Transaction-based vs entity-based regulation

As noted in a submission to this review[18], the current system operates largely on a transaction-based model, with each consignment assessed in isolation. While there are mechanisms to apply additional scrutiny where an importer or brokerage has a history of non-compliance, these are generally

[17] Interview with staff at Gavos Freight Services, conducted by the review team, Melbourne, 12 May 2026.
[18] David Ironside, *Submission to the Inspector-General of Biosecurity: Review of Documentation*, 2026.

reactive and limited in scope. Beyond this, there is little consideration of an entity's broader compliance history or demonstrated capability when assessing documentation.[19]

As a result, the system does not incorporate a form of regulatory memory that recognises consistent compliance. Documentation requirements are applied uniformly at the transaction level, regardless of who is submitting them or how they have been met historically. This means there is limited incentive or bonus for brokers or importers who consistently meet requirements in a structured and effective way to benefit from that past performance. This has implications for the efficiency of documentation requirements as a control. Where requirements rely on consistent interpretation and application, a purely transaction-based approach does not account for variation in how different entities prepare and present documentation, as identified elsewhere in this review.

Brokers indicated support for the development of an approach more aligned to the Australian Border Force's *Trusted Trader* program[20], where entities with a strong compliance history are provided with streamlined processes or enhanced engagement with the department. This has also been raised in a previous Inspector-General review.[21] Potential benefits identified by them include more direct access to decision-makers, case management arrangements, and opportunities to simplify documentation and assessment processes.

Elements of a trust-based approach already exist within the current system. Under approved arrangements, accredited brokers are able to assess consignments and make determinations against documentation requirements with limited direct departmental involvement. This reflects a level of confidence in the capability of these parties and demonstrates more streamlined models of interaction are already operating in practice in selected areas.

Nonetheless, current arrangements appear to remain consistently focused on an individual transaction level. The Inspector-General was informed that this approach is also applied in scenarios where supply chains are stable and well established. For some large importers, brokers may manage high volumes of consignments involving the same commodities, suppliers, and manufacturing processes over extended periods. An example of this would be where a supermarket imports frozen pineapple from the same supplier in Vietnam for all their imports for multiple years.

In these cases, documents such as manufacturers' declarations are still required to be consignment specific, despite the underlying processes and risk profiles remaining unchanged. It is even the case that goods from the same production batch, experiencing the same exact manufacturing conditions and travelling at the same time will require multiple entries (and assessments) just because they are being shipped to different ports.

[19] Both the Compliance Based Intervention Scheme and the Highly Compliant Importer Scheme engage with importers at an entity level, but both are focused on the reduction of inspection requirements. This is a different stage in the importation process.
[20] Australian Border Force, *Australian Trusted Trader*.
[21] Inspector-General of Biosecurity, *Adequacy of the Department's Operational Model*.

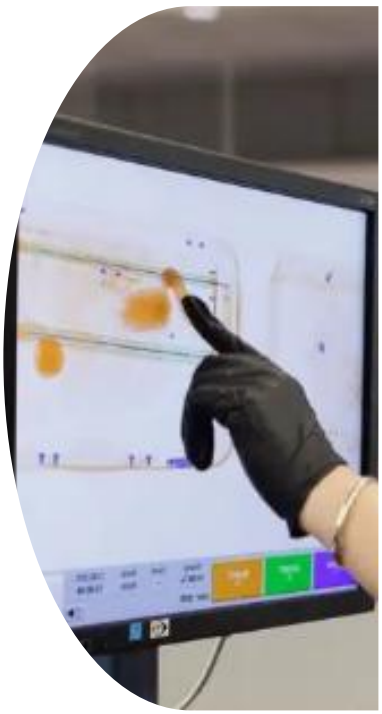
It is hard to see how this repetition provides additional risk assurance. It also contributes to increased administrative effort for both industry and the department, without seeming to provide a corresponding improvement in risk management outcomes.

The Inspector-General sees benefits in exploring alternative approaches, where equivalent information could potentially be provided through periodic or consolidated declarations without reducing assurance of biosecurity risk. While there may be system limitations in moving beyond transaction-level assessment at this time, consideration of entity-level approaches would better reflect how supply chains operate in practice and support more efficient allocation of resources as import volumes continue to grow.

FINDING 2.1
The focus on individual transaction level interactions creates inefficiencies without a commensurate reduction in risk and the department should consider its ability to implement entity-level, batched, annual or other approaches.

2.3 The relationship between documentary compliance and biosecurity risk

While BICON cases outline specific documentation requirements, stakeholders reported the rationale underpinning these requirements is not always evident, making it difficult to interpret what constitutes sufficient or appropriate evidence for a given consignment. This can create uncertainty in how requirements are applied, increase reliance on iterative clarification, and contributes to delays and additional effort during assessment.



These challenges are compounded by the practical realities of evidence gathering. In many cases, documentation such as manufacturers' declarations must be sourced through complex supply chains, where importers may be several steps removed from the original manufacturer. This process can involve engaging with non-English speaking parties, differing business practices, and varying levels of documentation capability or record-keeping. As a result, documentation assumed to be readily obtainable in policy settings may be difficult, time-consuming, or in some cases not feasible to obtain in practice. This indicates that some documentation expectations may not fully reflect the conditions under which importers and brokers operate. (See Appendix 2 for further discussion on manufacturers' declarations.)

Even where evidence can be obtained, stakeholders reported uncertainty regarding the forms of evidence considered acceptable for assessment purposes. For example, photographs showing manufacturing or processing activities to explain biosecurity risk mitigation treatments may be considered insufficient when submitted as standalone evidence but may be accepted when incorporated into a manufacturer's declaration that satisfies departmental *Minimum documentary and import declaration requirements* policy requirements. In these circumstances, the underlying evidence remains materially unchanged, while the format and presentation of that evidence become a determining factor in its acceptance.

This suggests the structure of documentary requirements may, in some cases, place greater emphasis on how evidence is presented over the evidentiary value of the information itself. Where

acceptable forms of evidence are not well understood, there may be an increased focus on adapting documentation to align with assessment expectations, rather than on accurately representing how the underlying biosecurity risk has been managed. Where assessment outcomes are perceived to depend on the documentary format, effort may become focused on aligning documentation with assessment expectations rather than on accurately representing how the underlying biosecurity risk has been managed.

In practice, this can result in documentation being provided that meets the formal requirement but does not provide meaningful assurance of biosecurity risk. This reflects a shift from demonstrating compliance with risk controls to demonstrating compliance with documentation requirements.

This focus on documentary compliance, rather than accurately representing how biosecurity risk has been managed, can become more pronounced during the assessment process where additional documentation or clarification is requested following an initial assessment. While the Inspector-General acknowledges the importance of providing importers and brokers with an opportunity to correct errors or address gaps in documentation, there is a risk that this process may lead to documentation being amended to satisfy the stated requirement and no longer being an accurate reflection that the underlying biosecurity risk has been effectively managed. This is particularly the case where there is limited or no verification of the veracity of the documentary evidence provided.

FINDING 2.2
Current documentation processes may provide assurance of documentary compliance without providing equivalent assurance of risk mitigation.

2.4 Communication and relationship management

The department has taken steps to support more direct engagement between assessment officers and brokers, including the proactive use of phone contact to resolve documentation issues. This appears to be in response to a clear focus from operational managers, who in interviews consistently discussed encouraging officers to contact brokers directly by phone in the first instance. It is also supported by system improvements introduced early in 2026 that make this process easier for officers. While numbers are good, with data showing over 1,000 outbound calls to industry each month, it will take time for these practices to become fully embedded in day-to-day work practices.

The Inspector-General considers that direct communication between assessment officers and brokers plays an important role in supporting efficient assessment processes. Observations and feedback show issues with interpreting documentation requirements that can take hours to resolve through centralised or digital channels, such as system messages, can often be resolved in minutes through a direct phone call. In one example, a simple documentation assessment issue took over 3 hours to resolve through messaging. It is important to note, opportunities for direct communication are dependent on action by departmental staff, as brokers are unable to identify or contact the assessing officer responsible for their consignment. This remains a point of frustration for industry.

Even relatively small changes in communication approach can have a material impact on both processing efficiency and stakeholder experience. Some concerns were raised about officers experiencing inappropriate behaviour when dealing directly with external parties. However, both staff and brokers indicated this type of behaviour is more likely to arise from frustration caused by delays or unclear requirements and is very unlikely to occur when an officer initiates a call. More direct and timely communication may help reduce this risk by addressing issues earlier.

Concerns were raised about the possibility of officers becoming too familiar with certain brokers. While such risks should be appropriately managed, the Inspector-General considers existing integrity frameworks, including training and ongoing guidance, provide a strong basis for managing it. In this context, the Inspector-General considers the efficiency and communication benefits of direct engagement outweigh the likelihood of inappropriate conduct arising from increased interaction.

Improved communication practices can support:

- faster resolution of documentation issues
- reduced assessment effort for both industry and the department
- earlier identification and correction of common errors
- more timely processing of consignments

Proactive communication, where officers contact brokers to resolve issues, can also improve how the system works in practice. The Inspector-General notes there are opportunities to improve how common issues are shared with industry. For example, periodic industry notices could highlight recurring documentation problems and provide practical guidance to brokers. Officers suggested one such notice could explain the benefits of clearly linking line items to the correlating import case when an import permit had multiple cases within it.

FINDING 2.3
The department would benefit from continuing to explore opportunities to increase appropriate, direct communication between assessment officers and brokers, particularly at the point of processing. This includes supporting officers to engage confidently and professionally with external parties, while maintaining appropriate safeguards to manage integrity risks. Strengthening these communication pathways would improve efficiency, reduce rework, and support more consistent application of documentation requirements in practice.

2.5 Incentives shaping participation in approved arrangements

Approved arrangement class 19 are voluntary, trusted arrangements under which accredited industry participants undertake specified documentary assessment functions and directions for the management of biosecurity risk on behalf of the department for specified goods. Participants must complete specialist accreditation training, maintain ongoing competency requirements and operate within established quality management systems. The department conducts verification activities to provide assurance that accredited persons continue to apply import requirements appropriately and that their systems and practices remain aligned with departmental expectations. Where documentation does not meet the requirements set out in BICON, accredited persons are expected to refer the matter to the department for further consideration.

To support accredited persons in fulfilling these responsibilities, the department provides guidance and continuing professional development opportunities. This includes regular training and engagement activities, with additional short training videos on key topics planned for release to support consistent understanding of requirements.

The approved arrangements are intended to provide operational benefits for accredited parties including:

- The ability to generate systems directions at the time of lodgement, including outside normal business hours.
- Reduced costs, as import declarations lodged under class 19 arrangements are not subject to assessment fees unless selected for verification.

The approved arrangement model also provides benefits to the department. By enabling suitably trained and accredited industry participants to undertake documentary assessments, the arrangements reduce the volume of lower-risk assessments requiring direct departmental intervention. This supports more efficient allocation of departmental resources and allows biosecurity assessment officers to focus effort on higher-risk consignments and more complex biosecurity matters.

The department advised that accredited persons maintain a high level of performance, with compliance rates under class 19 approved arrangements sitting at approximately 97.5%. This indicates the arrangements are operating effectively.

Notwithstanding this, a number of stakeholders told the Inspector-General that the compliance settings associated with approved arrangements influenced their willingness to participate. As one broker stated:

> *Trusted pathways such as AEP [approved arrangements] have clear potential but remain underutilised. A key barrier is the perceived imbalance between the benefits of participation, and the consequences of non-compliance. Penalties for relatively minor or technical non-compliance are viewed as disproportionately high, creating reluctance among brokers and importers to participate.*[22]

The Inspector-General notes these views represent stakeholder perceptions and may not be reflective of the experiences of all participants. However, they were raised consistently enough to warrant consideration.

A recurring theme in stakeholder feedback was the belief that compliance under approved arrangements is assessed primarily through adherence to technical documentation requirements rather than through a broader assessment of biosecurity risk. While accredited persons play an important role in managing biosecurity risk, they do so by applying prescribed import conditions and requirements set out by the department. Their role is to assess documentation against those requirements and ensure sufficient evidence exists to demonstrate compliance. The department considers that technical non-compliance with document requirements could be viewed as evidence of failure of quality systems and needs to be reflected by a reduction in the trust granted by the department through increased surveillance.

This differs from the role of departmental biosecurity assessment officers, who may consider a broader range of factors when assessing a consignment and are entrusted to exercise professional judgement in managing biosecurity risk. Accredited persons are generally expected to apply import requirements as prescribed, rather than exercising equivalent discretion. As a result, verification activities focus heavily on whether documentary requirements have been met. Stakeholders indicated this can create a perception that minor documentation deficiencies may result in non-compliance findings even where the underlying biosecurity risk is considered low.

Stakeholders also reported that communication regarding verification outcomes is not always perceived as timely or clear. While the department issues formal notifications when non-compliance is identified, some brokers indicated that they become aware of a non-compliance only after increased assessment activity has been applied to subsequent lodgements or a service charge has been incurred. The department advised this can occur where contact details recorded in relevant systems are not current, affecting the receipt of notifications. However, stakeholders considered

[22] Response to external survey

that the delayed awareness of non-compliance reduced confidence in the arrangement and contributes to a perception that the consequences of error are difficult to predict or proactively manage.

While overall compliance rates remain high, stakeholder perceptions regarding technical non-compliance, escalation processes and the visibility of verification outcomes have the potential to affect engagement with approved arrangement pathways. Where brokers elect not to utilise approved arrangement pathways, lower-risk documentary assessments that could otherwise be managed by accredited persons may instead be referred to departmental officers. To the extent this occurs, it may reduce some of the efficiency benefits intended by the arrangement and limit the department's ability to concentrate assessment effort on higher-risk activities.

The department advised that utilisation of approved arrangement pathways has increased over time, which it considered indicative of industry confidence in the program. While increased usage is a positive indicator, the Inspector-General was unable to determine whether this growth reflects greater uptake of the arrangements relative to the available assessment workload, or simply broader growth in import volumes and lodgement activity. The department was unable to demonstrate the extent to which participation has increased against an expected baseline or the population of consignments potentially suitable for management under approved arrangements. As such, caution should be exercised in drawing conclusions about the effectiveness of current settings based solely on increasing utilisation.

The Inspector-General notes that approved arrangement participants demonstrate high levels of compliance overall. However, stakeholder feedback suggests that perceptions regarding the consequences of technical non-compliance, combined with concerns about the visibility and timeliness of verification outcomes, may influence willingness to participate. While these views may not be representative of all accredited persons, they illustrate how perceptions of regulatory risk can affect engagement with what is intended to be a trusted and efficient pathway.

FINDING 2.4
Perceptions in industry about the approach to compliance for Approved Arrangements Class 19 may be creating a disincentive for use of this pathway.

Section 3 – Internal interactions

The way internal staff interact with documentation requirements varies across operational areas within the department with varying levels of visibility of how requirements are developed, applied, and operationalised.

This variation can influence how documentation requirements are understood in practice. In some operational settings, staff have closer engagement with policy teams and development processes, while in others there is limited visibility of how requirements are created and how assessment decisions translate into downstream activities. As a result, documentation may be interpreted within a narrow operational context, rather than as part of a broader risk and assessment process.

Within this context, a significant proportion of documentation assessment activity occurs within dedicated assessment teams based in offices all across Australia. Observations from this review indicate that, within these teams, staff do not always have a clear understanding of how information flows through the system from end to end.

This limited understanding can create uncertainty when interpreting documentation, particularly where intent is not clearly evident, and is compounded by functional siloing, where staff are primarily exposed to specific stages of the process and have limited visibility of upstream or downstream activities.

Conversely, exposure to other stages of the regulatory process appears to improve understanding and performance. Document assessment officers who have engaged in inspection or field-based activities reported greater insight into how documentation is generated and what constraints apply in practice. This supports a more integrated understanding of the assessment process and may improve how documentation is interpreted and applied.

Recommendation 4

The department ensures greater opportunities are developed for staff to understand the wider operations of the biosecurity system through exchanges, shadowing and secondments. This should include policy staff improving their understanding of operations and should consider opportunities for assessment officers to spend time seeing how brokers operate.

3.1 Culture, judgement and operational behaviour in assessment

While documentation requirements are a central component of biosecurity assessment, the way they are applied in practice is influenced by organisational culture, operational pressures, and the expectations placed on staff. These factors shape the extent to which officers engage critically with documentation, rather than applying requirements in a purely procedural way.

Observations from this review indicate there can be tension between taking the time to thoroughly assess documentation and meeting operational expectations related to processing efficiency. In many cases, assessment officers reported awareness of time-based charging, which may discourage deeper investigation of documentation where it is not immediately required to progress a case. This dynamic appears to reflect, in part, legacy practices from periods of higher workload and lower staffing, where there was pressure to meet service standards within constrained timeframes. There is also the very real occurrence of brokers complaining about charges beyond what they would normally expect, creating an implicit compulsion to undertake work quickly.

The importance of maintaining a culture of curiosity and critical engagement is reinforced by operational experience. For example, Operation Avoka was initiated following concerns raised by an inspection officer whose further investigation of goods identified high-risk items that had bypassed earlier biosecurity assessment. This case highlighted how risks can persist when documentation and system outputs are applied without deeper interrogation.

The outcomes of this operation have contributed to a stronger emphasis within the department on the role of professional judgement and critical engagement, particularly in documentation and inspection activities. The Inspector-General observed a clear focus in leadership expectations within assessment teams, with senior staff increasingly emphasising the importance of quality assessment outcomes and encouraging officers to look beyond procedural completion to the intent and evidentiary value of documentation.

While these observations were most evident within document assessment teams, cultural drivers vary across different operational environments. For example, in traveller processing, assessment is often conducted in time-sensitive settings where officers are required to make decisions quickly, in direct interaction with importers. In these contexts, documentation assessment may play a more limited or situational role, with greater reliance placed on immediate cues and real-time judgement.

Despite this, documentation requirements remain relevant, particularly for higher-risk goods that move through these environments. However, feedback indicates capability in assessing documentation in these settings is more variable. More complex documentation tasks, such as interpreting import permits, may be allocated to assessment officers with greater experience though these more experienced officers are not always supported by formal recognition, training, or clear assignment of subject matter expertise.

The Inspector-General considers sustaining a culture that supports professional judgement and critical engagement across all operational contexts will be important to ensuring documentation requirements are applied effectively. Where officers are supported to engage meaningfully with documentation, they are better placed to identify issues, interpret requirements appropriately, and make decisions that reflect management of the underlying biosecurity risk. It is important this encouragement includes tangible support for officers who are challenged for imposing additional charges or seeking inspections where further investigation is warranted.

FINDING
Senior leadership in the assessment areas are supporting and encouraging the use of judgement and staff focusing on the quality of assessments (rather than time taken) which will positively enhance assessment quality.

3.2 Knowledge sharing and internal capability

The application of documentation requirements in practice is shaped by how knowledge and experience are shared across the workforce. Observations from this review indicate information is often informal and locally held, with officers relying heavily on colleagues, particularly more experienced officers. These observations were most evident within document assessment teams, reflecting the primary focus of fieldwork for this review.

Existing escalation pathways also highlight broader limitations in the department's guidance framework. Work instructions frequently direct officers to escalate uncertainty to team leaders. However, team leaders do not receive additional or specialised training compared to frontline assessment officers and, in some cases, may have less experience in document assessment than the staff member seeking clarification. Team leaders also have a range of other responsibilities.

Assessment officers reported they were more likely to seek advice from colleagues rather than escalate questions to team leaders, particularly where team leaders were seen to be managing competing priorities. This was supported by observations of assessment processes during the field work portion of this review. These behaviours reinforce reliance on informal knowledge-sharing and can contribute to variability in how documentation requirements are interpreted, particularly where solutions are not consistently captured or shared more broadly.

This reliance on informal networks highlights a broader gap in how knowledge is shared. In practice, experienced officers frequently act as de facto subject matter experts, but there is no formal mechanism for recognising, supporting, or systematically drawing on this expertise. This can result in knowledge remaining unevenly distributed and dependent on local relationships rather than being accessible across the network. This was reflected in staff feedback, with one respondent noting:

> different teams [in different locations] focus on different areas of interest or concern within the documentation, leading to different interpretations and decisions.[23]

This lack of formal recognition of expertise also limits opportunities for progression based on technical capability, with advancement more commonly associated with supervisory roles. This may reduce incentives for officers to develop and maintain deeper subject matter expertise in documentation assessment.

This is reflected in operational behaviour, with some officers reporting reluctance to take on more complex entries, such as those involving seeds, or to pursue opportunities for training in imported food assessment. In this context, the development of deeper technical expertise may be seen as increasing workload complexity without a corresponding recognition or career progression benefit.

There are opportunities to strengthen this model by introducing clearer pathways for recognising and supporting expertise, alongside mechanisms to capture and share solutions to complex or unclear cases. For example, where officers resolve a “question of case,” recording and sharing

[23] Response to staff survey

outcomes more broadly could reduce duplication of effort and support more consistent interpretation of requirements.

The Inspector-General was encouraged to see the department has taken steps to support knowledge sharing. A key initiative is The Grove, an internal platform described as "a dynamic, all-purpose support dashboard for document assessing officers" and "a positive support platform". The Grove provides opportunities to recognise strong performance and share examples of practice and has the potential to function as a broader knowledge hub.

At present its use is more focused on feedback and recognition than on the systematic capture and dissemination of lessons learned. While the potential exists, it does not yet serve as a consistent mechanism for enhancing shared understanding or improving the application of documentation requirements across locations.

In addition, the ongoing effectiveness of The Grove as a platform appears to rely heavily on the initiative and efforts of individual staff. While the project benefits from a strong plan and committed team, it is unclear how project activities are resourced, including the extent to which staff contribute in addition to their core duties and whether dedicated funding has been provided. Projects that depend on staff contributing time alongside their core duties may be more likely to languish where dedicated project management and resources are not available. Without formal support and funding, it is possible the platform's longer-term development and sustainability may be constrained, particularly should key contributors move to other roles.

Recommendation 5

The department strengthens mechanisms for structured information sharing between document assessment officers on a national level, including providing ongoing formal support for The Grove.

While these observations around knowledge sharing were most evident within assessment environments, similar challenges are likely to apply across other operational areas where documentation is interpreted and applied, particularly where access to consistent guidance and shared knowledge is limited.

3.3 BICON navigation and case selection

The selection of the appropriate BICON case (or in some instances multiple cases) is a critical step in the application of documentation requirements, as it determines the conditions that apply, the evidence required, and the subsequent assessment pathway. Observations from this review indicate identifying the correct case is not always straightforward and can require significant judgement on the part of the assessing officer. In the Inspector-General's view, this is often the most challenging part of an assessment for assessing officers.

There does not appear to be specific, structured training to support operational staff in determining how to choose the correct BICON case. Available user guides provide limited guidance on how to determine the most appropriate case in practice. As a result, officers rely heavily on their own experience, the knowledge of colleagues, and ad hoc problem-solving approaches when navigating BICON. This reinforces earlier findings that knowledge is often informal and locally held.

In some instances, multiple cases within BICON may appear applicable, particularly where product descriptions are complex or do not align neatly with case categories. In the absence of clear guidance, different officers may reasonably select different cases for similar goods. This can result in

variation in the documentation requirements applied and, ultimately, materially different assessment outcomes.

The BICON case selection case study demonstrates how variations in case selection can result in materially different outcomes for the same goods. How a user arrives at a particular pathway is dependent on their interpretation of the case and the import scenario questions.

Case Study – BICON case selection

River is looking to import wool weed matting for sale in their nursery. The product is sold under the brand name "Land Weave Geotextiles" and will arrive in large retail-ready packaging.

Depending on the initial BICON case selected and the pathway followed, a range of different outcomes may result, including:

- inspection and potential release
- direct release without inspection
- inspection leading to further intervention (such as destruction or export)
- a requirement for an import permit

(Full scenario outlines are provided in Appendix 3.)

In many cases, resolving uncertainty requires discussion between assessment officers. However, as noted in Section 3.2, these interactions are often localised and not consistently captured or shared more broadly. The same conversations may be repeated in multiple places, taking up officers' time. It also risks the possibility that similar questions are resolved differently across teams or locations, reinforcing variability in the application of documentation requirements.

The Inspector-General considers that improving support for case selection within BICON—through clearer guidance, enhanced navigation tools, or more systematic knowledge sharing—would support more consistent application of documentation requirements and reduce reliance on informal and experience-based approaches. Strengthened engagement between policy and assessment officers would have further benefits as discussed elsewhere in this review.

FINDING

BICON case selection is challenging, and incorrect case selection can create significant risk for some commodities.

Recommendation 6

The department considers and implements approaches to support officers in using BICON, in particular the selection of appropriate cases.

3.4 System use behaviour: prompts vs critical assessment

Even where the correct case has been selected, observations from this review show assessment officers frequently rely heavily on system-generated prompts when reviewing documentation and applying requirements, as they appear in BICON, to consignments. While processes expect officers to consider all relevant information, it was consistently observed that officers often skip past the detailed import conditions and rely on system prompts. One officer commented that this information was "for brokers." This creates a risk that early errors, such as selecting the wrong case, are not identified, with later decisions based on the prompts rather than a full review of the requirements.

In practice, BICON is a decision support tool, assisting officers to assess biosecurity risk based on commodity and pathway information. The value of this kind of tool depends not just on how it is

designed, but on how it is used in an operational environment. Evidence from research suggests users of automated or semi-automated systems tend to favour system-generated cues over less visible information. Highly visible prompts attract attention and can become the primary focus of interaction, even where additional contextual or explanatory information is available elsewhere in the system[24].

When a system like BICON provides both detailed information (such as written import conditions) and simplified guidance (prompts), users are more likely to rely on the prompts. This reflects their relative ease of use, as prompts can be navigated quickly, whereas detailed conditions require more time and effort to read and understand. As a result, important information in the detailed content can be missed, even when it is directly relevant to assessing biosecurity risk.

This behaviour is also linked to automation bias, where users place greater trust in system outputs and are less likely to independently verify or challenge them. Studies have noted that reliance on automated decision support tools can lead to reduced monitoring of underlying information and increased susceptibility to both omission and commission errors[25]. With systems such as BICON, where both detailed narrative conditions and simplified prompts are presented, this creates a structural incentive to prioritise efficiency over thoroughness.

Another factor affecting how the system is used is the way work instructions are applied in practice. Guidance provided to assessment officers directs them to consider the consignment as a whole and match lines in the system to lines in supporting documents. In practice, observations indicate this level of detailed cross-referencing is not always undertaken. This reflects how complex entries can be. Goods are often grouped or described in ways that do not match neatly across documents, making line-by-line checks difficult and time-consuming. When tasks are hard to carry out within the time and system constraints, officers are more likely to rely on quicker approaches, such as following prompts.

These factors affect not only how much information is considered, but how judgement is applied as decisions become increasingly shaped by system prompts rather than independent evaluation of risk. This means when prompts do not fully reflect a situation, or when the wrong pathway is selected, important information can be missed. This has direct consequences for biosecurity risk assessment, especially where key risk factors are described in written conditions but not captured in prompts.

[24]Cummings, *Automation Bias in Intelligent Time Critical Decision Support Systems*.
[25] Parasuraman and Riley, *Humans and Automation*.

For example, in the wool geotextiles case study, the import conditions include specific information about the products intended end use. While this information was apparent within the detailed conditions, it was not directly translated into system prompts. Observations suggest that under current practices when this type of information is not reflected in prompts, it is less likely to be consistently identified and applied, increasing the risk that important biosecurity factors relevant to documentation requirements and biosecurity risk can be overlooked.

This interaction between system design and user behaviour reinforces earlier findings in this review, where outcomes are shaped not just by the documentation provided, but by how that information is interpreted and used in practice.

Addressing this issue does not necessarily require further prescriptiveness within the system. Expanding prompts to capture all possible contingencies would introduce additional complexity and reduce the system's flexibility in responding to novel or atypical scenarios. Rather, these findings highlight the need to balance the efficiency benefits of decision support tools with the importance of professional judgement and critical engagement with underlying requirements.

The Inspector-General considers this has broader implications for how officers are supported to use BICON and similar systems. This includes reinforcing the importance of quality assessment over simply completing processes, and supporting officers to look beyond prompts when making decisions. While current management initiatives aimed at encouraging more thoughtful, risk-based assessments are positive, ongoing effort is needed to ensure these behaviours are maintained.

3.5 Integrity of documentation and fraud capability

Existing departmental work instructions and guidance provide limited support for assessing the authenticity and evidentiary value of documentation. As a result, there is a lack of clarity for officers on what constitutes sufficient assurance that documents are genuine and reliable. There are example document databases for formal government documents such as health certificates and phytosanitary certificates, noting though these are not provided in BICON and have to be accessed through a different system. These do provide guidance around fraud control methods used by other countries but take further time and effort to access.

In practice, assessment of documentation tends to focus on whether required elements are present, rather than whether the information provided is accurate or independently verifiable. For example, when reviewing manufacturers' declarations, officers may check the document is appropriately formatted, dated, includes a company identifier such as a logo, and has been signed as per the department's *Minimum documentary and import declaration requirements* policy. However, there are generally no expectations or guidance around practical mechanisms to undertake further verification, such as confirming the existence of the company, the legitimacy of the issuing entity, or the authenticity of the information provided. A further discussion of the challenges of reliance on manufacturers' declarations is at Appendix 2.

In this context, documentary compliance can become conflated with assurance of biosecurity risk, with documentation functioning as a proxy for underlying processes, treatments, and system controls. Where this distinction is not clearly maintained in practice, there is a risk that meeting documentation requirements does not necessarily equate to demonstrating that biosecurity risks have been effectively managed.

The Inspector-General was informed of instances where false or misleading documentation had been identified through assessments, indicating the risk of fraudulent documentation is not

theoretical. Training materials also acknowledge documentation may be fabricated, particularly where genuine documentation is difficult or costly to obtain through complex supply chains.

Despite this, there appears to be limited ongoing training or practical guidance to support officers in identifying indicators of fraudulent documentation or distinguishing between deliberate misrepresentation and administrative error. There also seems to be little systematic recording of potential fraudulent or criminal behaviour or the applications of sanctions beyond the export or destruction of goods. Issues relating to the reporting of non-compliance are discussed more in section 3.8.

Case study – "being sneaky" versus fraud

Bots are used to check onshore fumigation records to ensure they meet the minimum requirements for each methyl bromide treatment. To enable this, fumigators fill in an Excel form and submit it to the department.

If a treatment does not meet the requirements, the department will notify both the importer and the treatment provider. A known issue for the department is that fumigators will sometimes resubmit the same treatment record with numbers tweaked, in the hope the bot will flag it as ready for a biosecurity officer to approve. The team managing these assessments has put a fix into the system to ensure this cannot be done without detection.

While reviewing fumigation records with the Inspector-General, an officer described the fumigator's actions as "being sneaky". The officer identified an instance in which a fumigator had resubmitted a previously submitted Record of Fumigation with altered figures. The revised document was rejected. When asked whether the matter would be reported to compliance, the officer advised that a report would have been submitted following the original failed test. The officer did not seem to recognise that this "being sneaky" was potentially the presentation of deliberately fraudulent documents to the Commonwealth, which is an offence. It would seem this particular action by industry participants while being managed, is not being actively followed up or investigated through compliance processes. Some level of compliance action could also have deterrent value. While being managed to some extent, the falsification of fumigation records represents a significant biosecurity risk, particularly during brown marmorated stink bug season.

Observations from this review illustrate how this emphasis on documentary compliance can operate in practice. In one instance, within the assessment of onshore biosecurity treatments, an officer identified inconsistencies in numerical data within a submitted document, noting parties may "adjust" values in an attempt to align with system expectations. While this behaviour was informally characterised as minor or opportunistic, such practices may represent deliberate misrepresentation of treatment conditions, highlighting a gap between how integrity risks are identified in practice and how they are formally understood.

In the Onshore Fumigation team, aspects of document assessment are supported by automated tools (bots) which review submitted data and provide recommendations to assessment officers. While these tools support efficiency, observations indicated that outputs may be accepted with officers having limited understanding of the independent verification process. Over time, this may reinforce reliance on system validation rather than critical assessment of the underlying information, particularly where manual rechecking would reduce the efficiency gains the system is designed to deliver. Ensuring there is a process for validation and verification is a critical aspect of transferring responsibility to systems and a balance between efficiency and assurance is needed to be found.

A similar dynamic was observed in relation to requests for further information, where there is a risk that documentation is being amended to meet specified wording or format requirements. Once

revised documentation is provided in the expected form, it is often accepted as meeting requirements, with limited consideration of whether the statements reflect actual conditions or processes or whether they have just been amended as requested. In this way, compliance with documentary requirements can become decoupled from assurance of the underlying biosecurity risk. Where authenticity and evidentiary value are not actively considered, there is a risk that documentation requirements operate as a compliance mechanism rather than an effective risk control.

Assessment officers also reported uncertainty regarding what constitutes fraud as distinct from poor documentation practices, and when concerns should be escalated or referred for further investigation. This lack of clarity can create hesitation in identifying and acting on potential integrity issues, particularly in environments where there remains a focus on timely processing.

The Inspector-General considers that strengthening guidance, capability, and assurance processes relating to documentation integrity would support a more effective risk-based approach. This includes improving clarity on expectations for verification, supporting officers to identify potential indicators of fraudulent documentation, and reinforcing clear pathways for escalation where concerns arise. Strengthening these elements would enhance the role of documentation as evidence of risk management, rather than as an end in itself and ensure that documentation requirements function as an effective control within the biosecurity system.

FINDING
There is a need to strengthen assessment officers' understanding of fraud and the identification of repeat offenders. There should also be further work to support the judgement of assessment officers around risk management rather than pure documentary compliance.

Recommendation 7

The department increases support and resources for officers to identify and report documentation fraud.

3.6 Operational inefficiencies and workforce pressures

In addition to factors directly related to documentation requirements, a number of broader operational observations were identified that influence how effectively officers are able to engage with documentation in practice.

Observations from this review indicate that relatively small inefficiencies within systems and processes can have a cumulative impact on officers' time and workload. Tasks that may take a short amount of time individually can become significant when repeated across large volumes of assessments and across multiple officers.

During the observation phase of the review a number of process inefficiencies were identified. Assessment officers spent considerable time copying and pasting information across multiple systems, introducing avoidable errors. These errors included incorrect permit numbers being entered and assessment officers accidently viewing incorrect documentation, for example when documents from a previous assessment were still left open and read as though part of the new assessment. A significant proportion of these inefficiencies are largely system driven and unlikely to be remedied unless there is significant investment in the development of a single system or tools that enable more efficient communication between systems.

A specific example of a system-driven inefficiency regards the recording of location data by officers. When an assessment officer begins an assessment, the first step is applying a *present all documentation* direction. This requires the officer to click through multiple drop-down steps to select their location, a manual process which could be replaced with automation, or potentially removed entirely. While each instance is minor, the repetition of this step across many entries creates a measurable administrative burden.

Based on indicative data, this step was completed approximately 260,000 times in the 2024-25 period, with each instance taking an average of 20 seconds. This equates to over 1,400 hours of assessment officer time annually—the equivalent of one officer working almost full-time for around 38 weeks of the year on a task that does not contribute to assessing biosecurity risk, reducing the time available for substantive documentation assessment.

Alongside these system-driven inefficiencies, observations from this review indicate officers have developed individual workarounds to manage workflow and maintain oversight of tasks. One common example is the use of personal tracking sheets to record and monitor assessment activities. While these tools support day-to-day operations, their widespread but inconsistent use points to underlying gaps in system functionality, particularly in relation to workflow visibility, record-keeping assurance, and ease of access to information (further details can be found in Appendix 4).

The operational environment in which documentation is assessed is also characterised by a high level of cognitive demand. Assessment officers are required to use multiple systems simultaneously for each consignment, with information often needing to be manually transferred between systems. In addition to these core platforms, officers may also need to reference other systems or sources to confirm inspection locations, verify electronic certification, or assess whether treatments have been undertaken by recognised authorities.

In some operational settings, this complexity is even more pronounced. For example, within the PEQ environment, staff use many spreadsheets (35) along with additional calculators and their own various electronic systems to access and cross-reference information required for assessment and processing activities. These fragmented information sources require sustained attention and increase the likelihood that relevant information may be overlooked or inconsistently applied.

While the nature of cognitive load varies across operational environments, similar pressures are evident in other contexts. In traveller processing environments, officers are required to make rapid decisions in real time, often under time pressure and in direct interaction with passengers. In these situations, the combination of time constraints, interpersonal dynamics, and the need to interpret documentation quickly can further limit the capacity for detailed assessment.

These factors reduce the time and capacity available for staff to engage deeply with documentation requirements. Where workloads are high and systems are complex to navigate, there is a greater tendency to prioritise efficiency and task completion over detailed assessment of documentation and underlying biosecurity risk.

Some of the inefficiencies created by systems may be addressed as part of current IT reform programs and particularly the STEPS initiative, however, this is not certain and there is some scepticism evidenced through the survey that there will be real efficiencies introduced. A focus on reducing the need for officers to use multiple systems is critical. There should also strong consideration of improvements to current systems with the cost-benefit carefully considered for systems which are likely to continue to operate for 3+ years. Finally, given that a significant amount of the work undertaken by assessment officers involves the comparison of one statement to

another, or the checking of numbers and dates, much of this routine work is ripe for automation. Increasing automation would free officers up to focus on the key areas where judgment and thought are necessary, rather than spending much of their time checking and comparing.

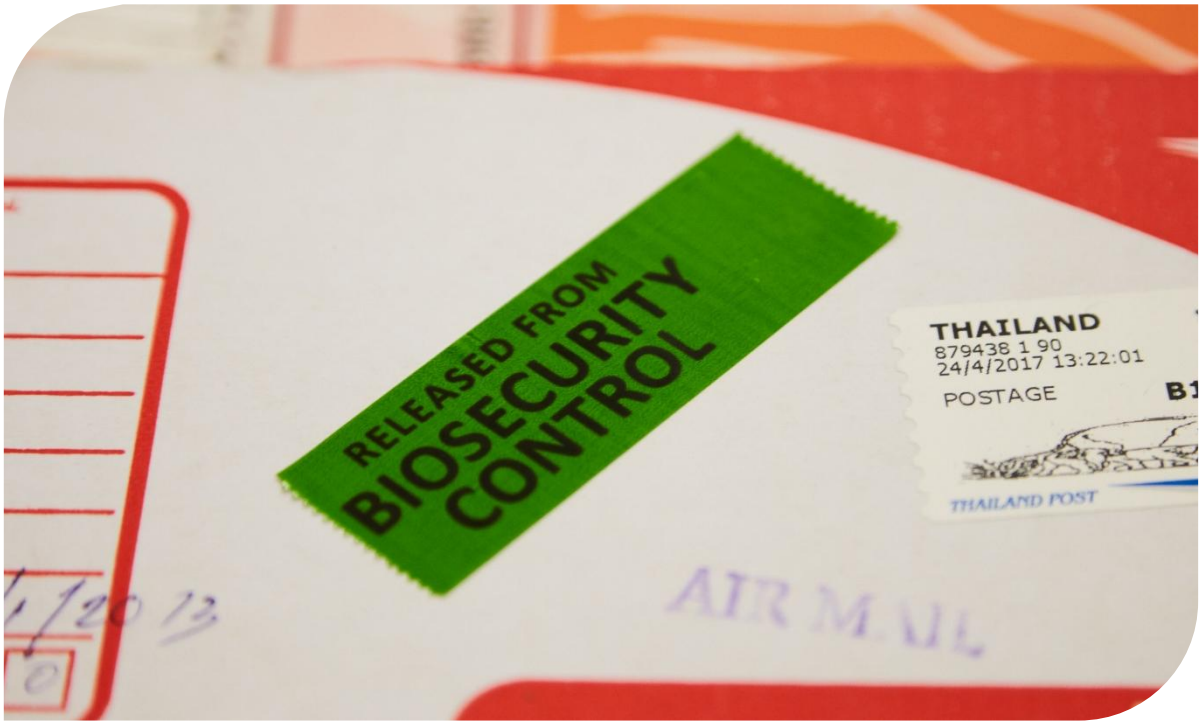
The Inspector-General considers that addressing operational inefficiencies, reducing unnecessary administrative burdens, and improving system integration would support a more effective application of documentation requirements. Reducing cognitive load and enabling staff to access information more efficiently would better support critical engagement with documentation and improve the quality and consistency of risk assessment outcomes.

FINDING
The current use of multiple systems creates significant inefficiencies as well as a high cognitive load for assessing officers.

3.7 Inspection alignment and risk targeting

The effectiveness of documentation requirements is closely linked to how inspection effort is directed in practice. Where documentation provides sufficient information to assess risk, goods can be released without further intervention. Conversely, where documentation is incomplete, unclear, or does not adequately differentiate risk, inspection may be used as a compensating control.

Inspection is an established and appropriate biosecurity risk management tool, and under current legislative and operational settings, importers or their representatives may nominate inspection as part of the clearance pathway. However, the way in which inspection is used in practice has implications for how departmental resources are allocated, particularly in the context of increasing trade volumes and the need to focus effort on higher-risk goods.



Observations from this review indicate inspection effort is not always optimally targeted towards higher-risk consignments. In some instances, goods that could be considered low risk based on their nature or end use are nevertheless directed for inspection, often due to a lack of sufficient documentation to support release decisions.

The low-risk goods sent for inspection case study shows how inspections may be applied in cases where the level of risk could reasonably be assessed earlier. In these situations, inspections effectively substitute for clearer information at the assessment stage. Although each step in the process is routine, the combined effort across assessment, allocation coordination and inspection represents a use of resources that may not be best directed.

Case Study – low-risk goods sent for inspection

Pablo, an assessment officer, receives documents for a consignment for goods described broadly as "artwork". The documentation provides limited detail beyond this description, and a community protection question relating to wooden components has identified they are present. Rather than source additional information the broker has nominated for a verification inspection and provided a location.

Pablo completes the inspection directions and sends them back to the broker through the system.

The broker then books an inspection with the Client Contact Group.

Owen in the client contact group spends around 10 minutes allocating the booking to an appropriately trained officer, Neev.

On the morning of the inspection, it takes Neev 20 minutes to drive to the inspection location. It takes the on-site staff another 10 minutes to locate and unpack the artwork. It is an oil painting in a highly varnished wooden frame. Neev takes 5 minutes to inspect the piece for biosecurity risk material before clearing it for release in the system.

In this case, the provision of clearer information at the assessment stage, such as a detailed commercial invoice identifying the item as a painting in a finished wooden frame, may have supported a documentation-based release without the need for inspection, allowing effort to be more effectively targeted toward higher-risk consignments. Alternatively, officers could be empowered to make judgement calls – individual high-cost art works, for example, are almost always going to be of a low biosecurity risk even if wooden elements are present.

It is good to see the department has recently taken steps to address this use of inspection resources in at least one case. Previously, used aircraft parts were classed with used car parts and other machinery and subject to automatic inspection. For a highly regulated industry like aviation where most participants undertake their own careful inspection of goods, this seemed wasteful and duplicative. As of 8 July 2026, the BICON case has been amended to remove the requirement for inspection.

The Inspector-General considers that the department has an important role in supporting the appropriate use of both documentation and inspection as complementary risk management tools. While inspection remains a valid and necessary control, its use as a default pathway where information is incomplete or difficult to assess may limit the ability to direct resources toward higher-risk consignments or to verification approaches.

Strengthening this alignment between documentation, assessment, and inspection pathways and encouraging and supporting the use of judgement by assessment officers would support more effective targeting of regulatory effort and enhance the overall effectiveness of biosecurity risk management.

3.8 Predictability and risk management

A key concern for the Inspector-General from the approach to the use of documentation is around assurance, verification and predictability. For deliberate bad actors within the system, predictability of processes is a hole that can be exploited. The Inspector-General remains concerned that, with an adequate knowledge of BICON, assessment approaches and the inspection regime, it would be

relatively straightforward for documentation to be constructed which would have a high chance of being cleared without query.

As noted earlier, while manufacturers' declarations require a company letterhead, address and signature, there is no requirement for assessment officers to investigate the veracity of any of these. While officers often googled individual products, at no time in our observations did anyone search for companies, individual signatories or validate an address from a letterhead. While it would be unnecessary, inefficient and onerous for this to be done for every assessment, regular random checks could assist in introducing variability into assessments and making the process less predictable.

While the department does undertake Cargo Compliance Verification (CCV) audits which are random, it is noted that at April 2026, only 70% of referrals for CCV had been undertaken. At that time, 15% of CCV inspections showed non compliances. Given the importance of these audits to the compliance and assurance approach for cargo, the Inspector-General considers that the department should work harder to ensure CCV are prioritised as an inspection activity.

It should also be noted that the CCV process does not cover all commodities, nor would visual inspection alone be enough to determine the accuracy of documents such as manufacturing certificates

The department worked with the Centre for Excellence in Biosecurity Risk Analysis (CEBRA) in 2025 to strengthen the approach to CCV. Given there has been a full year since changes were introduced, it would be timely for the department to review and further improve these approaches. It is also important the department considers whether CCV should be expanded to address the challenges of predictability and lack of verification of documents like manufacturers' declarations.

FINDING

There are risks to the biosecurity system from the predictability of many of the system's processes and the patchy or incomplete verification and assurance regime around document assessment.

Recommendation 8

The department considers the viability of the expansion of the CCV scheme and ensures these inspections are seen as a priority. Further, the department examines ways in which it can reduce the predictability of its processes and improve verification and assurance.

3.9 Feedback fatigue and the visibility of outcomes

The effectiveness of documentation assessment arrangements relies not only on the quality of policy settings and operational guidance, but also on mechanisms enabling officers to provide feedback and report concerns. Feedback loops are essential to identify areas for improvement, reinforce sound professional judgement, and ensure emerging issues are visible to decision-makers. The review found current arrangements do not consistently provide timely acknowledgement, transparency or feedback on outcomes, contributing to what some described as "feedback fatigue".

Operational staff are often the first to identify issues within BICON conditions. However, conversations and survey responses collected during this review revealed a clear theme of reluctance to provide feedback. This appears to stem from a perception that raising issues does not lead to timely or meaningful outcomes.

One factor contributing to this reluctance appears to be the difficulty assessment officers experience when seeking clarification or raising issues with policy teams. When officers encounter an issue with an existing BICON case or permit and are unable to find an answer in guidance materials, the current process requires them to raise the matter through their team leader, who then contacts the relevant policy team. This process provides an opportunity for team leaders to triage enquiries, ensuring questions require escalation and are directed to the appropriate team. Communication is generally conducted through email, which can result in delays. Officers noted an apparent inconsistency whereby they are encouraged to contact brokers directly to quickly resolve assessment issues, yet internal enquiries often require more formal escalation pathways that can take considerably longer to produce a response.

A BICON issues register exists; however, awareness of the register does not appear to be widespread, with its use seemingly concentrated among specific individuals or locations. The department's promotion of the register is also unclear. For example, the internal Biosecurity Operations Division site contains a dedicated page for the Biosecurity Export Risk Tool (BERT), yet there is no obvious reference to the BICON issues register. During research for this review, the Inspector-General was advised by the department that BERT was no longer operational and was considered unsuccessful. The limited visibility of the BICON issues register may affect officer awareness and engagement with the mechanism, while the continued promotion of BERT may create confusion.

Even where officers are aware of and utilise the register, concerns remain regarding the effectiveness of the process and the timeliness of outcomes. Issues can take extended periods to progress from being recorded in the register to final resolution, often with limited visibility of whether or how they are being addressed. Through interviews and surveys, staff indicated this lack of transparent responsiveness discourages continued engagement in identifying and raising opportunities for system improvement. Over time, this reduces the effectiveness of feedback mechanisms and limits the department's ability to ensure documentation requirements remain clear, consistently interpretable, operationally practical and aligned with current risk settings.

FINDING

Operational staff feel discouraged from providing feedback due to complexity of process and lack of resolution, resulting in “feedback fatigue.” Mechanisms should be simple and allow speedy acknowledgement of concerns.

Feedback fatigue was not limited to the BICON issues register. Similar concerns were raised regarding feedback mechanisms associated with documentation assessment, inspection outcomes and non-compliance reporting.

Observations from this review indicate feedback mechanisms relating to documentation assessment and non-compliance are limited in practice. While officers are expected to identify and escalate concerns arising during assessment activities by submitting non-compliance reports through the department’s compliance case management system, there is often limited visibility of what occurs once those concerns enter subsequent stages of inspection or compliance process. This can weaken the connection between frontline observations and broader regulatory outcomes, reducing opportunities for officers to understand the value and impact of their reporting.

For example, where an officer directs goods for inspection based on concerns identified during assessment, they may not be advised of the inspection outcome unless they take additional steps to manually track and follow up the case. Similarly, where potential non-compliance is reported, matters may be referred to specialist areas without further feedback to the originating officer on

whether the issue was pursued, resolved or noted for potential contribution to a broader pattern of non-compliant behaviour.

In the absence of feedback, officers described a sense of “reporting into the void”, where effort invested in identifying and escalating concerns is not consistently acknowledged or reinforced. This reduces confidence in escalation processes and diminishes motivation to identify and report marginal or emerging issues.

Identifying and escalating concerns requires additional effort from officers, yet the outcomes of reporting are often not visible to those who raise them, while concerns that are not reported are unlikely to be revisited or independently identified. Over time, this dynamic may contribute to a culture in which escalation of ambiguous or emerging concerns is deprioritised and reduces the ability of officers to learn from their actions. This also has broader implications for system effectiveness, as individual observations that are not consistently captured, acknowledged or connected over time may prevent emerging patterns of non-compliance from being identified. Small inconsistencies or anomalies that appear insignificant in isolation can collectively indicate larger trends requiring intervention.

The Inspector-General considers strengthening feedback mechanisms would support both staff capability and overall system effectiveness. Providing clearer and more consistent feedback on the outcomes of inspections, non-compliance referrals and other escalated concerns, including where no further action is ultimately taken, would reinforce the value of staff observations and support the development of professional judgement. More transparent feedback loops would also help maintain staff engagement in identifying and reporting potential issues, reducing the risk that emerging concerns are overlooked. In turn, this would enhance the department's ability to identify patterns of non-compliance over time, continuously improve documentation requirements, and respond more effectively to emerging biosecurity risks.

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Appendix 1 (Department response)

OFFICIAL

Australian Government
Department of Agriculture, Fisheries and Forestry

SECRETARY

REF: EC26-001664

Dr Melissa McEwen
Inspector-General of Biosecurity
c/o Department of Agriculture, Fisheries and Forestry
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Melissa.Mcewen1@aff.gov.au

Dear Dr McEwen

Thank you for your correspondence of 2 September 2026, providing your review report, **Review of documentation requirements for the biosecurity risk assessment of imported goods**. I appreciate your insights and observations regarding document requirements for the biosecurity risk assessment of imported goods.

I acknowledge and agree with all eight recommendations contained in your review. My formal response to each of the recommendations is at **Attachment A.**

Many improvements are currently being progressed through existing assurance, verification, compliance, workforce capability and regulatory reform initiatives. These activities will go some way towards meeting your recommendations.

Through the Simplified Targeting and Enhanced Processing Systems (STEPS) program, the department is modernising cargo systems to improve online interactions and digital reporting. These reforms support document assessment and industry by removing fragmented manual processes and improving visibility across pathways.

While this work is underway, your review highlights areas of specific focus to enhance the effectiveness and efficiency of our document assessment processes, as reflected in my response. The department will prioritise its response in line with the priority rating assigned by you to each recommendation.

The department has assessed the report and **does not** consider the release of any information contained in the report to be prejudicial to the public interest.

Yours sincerely

V. Anderson

Victoria Anderson
Director of Biosecurity

1 October 2026

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Attachment A: Department of Agriculture, Fisheries and Forestry – Response to the IGB report: Review of documentation requirements for the biosecurity risk assessment of imported goods

Recommendation 1 – Critical

Recommendation:

The department considers how to improve its **assurance and verification** processes for documentation to increase confidence that documents accurately describe the contents, ingredients and manufacturing processes of imported goods.

Departmental Response - **Agreed**

The department agrees with the recommendation and recognises the importance of maintaining confidence in documentary controls used to support biosecurity decision-making.

The department currently undertakes a range of assurance, audit and verification activities across import pathways, including offshore treatment assurance activities, certificate authentication processes, Electronic Verification for eCertificates (EVE), compliance monitoring, and commodity-specific audit and verification programs.

Biosecurity Operations Division's (BOD) Regulatory Assurance Plan (adopted in June 2026) provides a structured mechanism to strengthen regulatory assurance across biosecurity operations. It supports pathway mapping, risk-based prioritisation of regulatory assurance activities, and reporting to identify gaps, emerging risks and opportunities to improve confidence in regulatory controls.

BOD will update the assurance plan to include assurance for documentation assessment to increase confidence in this risk management measure. This will be undertaken in line with the development of a broader risk-based prioritisation framework by March 2027, which will determine appropriate and proportionate regulatory assurance activities across BOD, aligned to risk and resourcing, and enabling prioritisation of assurance effort.

Recognising the critical rating of this recommendation, the department will explore priority actions to strengthen assurance and verification arrangements while broader reforms are progressed.

Recommendation 2 – Major

Recommendation:

The department considers the design and use of import permits with a view to reducing administrative burden, improving the clarity and usability of permit conditions, and ensuring permit requirements remain proportionate to the biosecurity risks they are intended to manage.

Departmental Response: **Agreed**

The department agrees with the recommendation and supports ongoing consideration of opportunities to improve the clarity, consistency and usability of import permits while ensuring import conditions remain practical, proportionate and effective in managing biosecurity risk.

The department provides staff with training, work instructions, guidelines and reference material to support consistent, lawful and risk-based assessment of import permit applications, including the identification of appropriate risk mitigation measures. Staff developing permit conditions are also supported by guidance on preferred terminology and principles for drafting conditions that are clear, precise, unambiguous and legally enforceable.

The design and use of import permits is being considered as part of the department's strategic review of the Goods Determinations and related regulatory framework, currently underway. This will

include assessing document requirements used in permit conditions to identify opportunities to standardise approaches, reduce unnecessary administrative burden and improve the clarity and usability of conditions, while maintaining enforceability and alignment with biosecurity risk.

Recommendation 3 – Major

Recommendation:

The department must do more to ensure there are active and ongoing links between those developing import conditions and operational staff. These links are needed to ensure effective feedback loops for information and a commitment to actioning feedback. It is critical that technical and policy staff understand operational realities. These links need to go beyond the BICON issues register and could include approaches such as the use of multidisciplinary teams for the development of import conditions, staff exchanges between areas and regular face-to-face meetings at APS levels.

Departmental Response: **Agreed**

The department agrees that strong connections between policy, technical, operational, compliance and assurance functions are essential to the effective development, implementation and continuous improvement of import conditions.

A range of mechanisms already support collaboration across business areas, including operational-policy engagement forums, officer exchange initiatives, Assessment Issues Register (AIR) processes, Assessment Response Coordination (ARC) arrangements, commodity-specific engagement mechanisms, operational business practice forums and regular interaction between operational and policy teams. These arrangements provide an established foundation for operational input into policy development and implementation activities.

The department acknowledges opportunities to further strengthen the effectiveness of these arrangements and improve feedback loops to improve the development of import conditions.

To address this recommendation, BOCG will ensure the assessment of document requirements to standardise our approach (outlined in response to recommendation 2) includes representation from the risk, policy, technical and operational workforces in the Group.

Recommendation 4 – Major

Recommendation:

The department ensures greater opportunities are developed for staff to understand the wider operations of the biosecurity system through exchanges, shadowing and secondments. This should include policy staff improving their understanding of operations and should consider opportunities for assessment officers to spend time seeing how brokers operate.

Departmental Response: **Agreed**

The department agrees that workforce mobility initiatives contribute to improved capability, knowledge sharing and understanding of the broader biosecurity system.

BOD's Workforce Action Plan includes priorities to build our workforce capabilities and enhance cross-skilling through staff mobility and multi-disciplinary teams. Current activities include a workforce mobility pilot, knowledge-sharing and collaboration initiatives that support stronger engagement. These activities will be further supported by the development of BOD's Frontline Regulatory Capability Framework (in development), which aims to identify and strengthen frontline regulatory capabilities, consistent practice and defensible decision-making across pathways.

The department is also engaging with peak industry stakeholders, including progressing structured industry engagement to give assessment officers and team leaders practical insight into customs broker operations, stakeholder perspectives and system-wide biosecurity interactions.

To address this recommendation, BOD will now expand this industry collaboration by nominating staff for participation in the broker experience program, enabling officers to spend time with customs brokers observing their day-to-day operations and gaining insights into their business processes, challenges, and perspectives. Additionally, BOD is currently reviewing its mobility trial and will develop an approach to foster ongoing mobility that complements the department's mobility programs.

Recommendation 5 – Important
Recommendation:
The department strengthens mechanisms for structured information sharing between document assessment officers on a national level, including providing ongoing formal support for The Grove.

Departmental Response: **Agreed**
The department agrees with this recommendation to strengthen information sharing across operational assessment functions at a national level.

The department uses several mechanisms to support structured information sharing. Information systems, including the Instructional Material Library (IML) and BICON, provide approved source material and guidance for staff. Communication channels, including BICON Alerts, Change notices and Operational Change Advices, advise staff of changes to operational policies, processes and procedures. Import Industry Advice Notices are also used to communicate important updates to external stakeholders. Dedicated SharePoint sites further support staff by consolidating relevant information and directing users to approved source material. The Grove operates as a national capability, culture and knowledge-sharing platform for cargo document assessors, supporting peer recognition, learning, wellbeing resources and operational knowledge sharing.

To address this recommendation, BOD will engage with staff to identify further opportunities to support information sharing across the document assessment workforce (e.g. through internal and external seminars, webinars and/or communities of practice).

Recommendation 6 – Important
Recommendation:
The department considers and implements approaches to support officers in using BICON, in particular the selection of appropriate cases.

Departmental Response: **Agreed**
The department agrees that officers should be supported to effectively navigate BICON and consistently identify appropriate import pathways and cases.

Significant work is underway to improve the usability, consistency and accessibility of import conditions across the biosecurity system. Through existing BICON governance arrangements, the department is progressing system and content improvements informed by operational and external user feedback, including consideration of improvements to search functionality, pathway structures, and case descriptions. The department is also exploring opportunities to leverage emerging technologies to improve user experience and decision support.

To address this recommendation, the department will identify and prioritise practical improvements to BICON guidance, case descriptions, pathway structures and search/navigation support, and progress endorsed actions to help officers more consistently select appropriate cases.

Recommendation 7 – Critical
Recommendation:
The department increases support and resources for officers to identify and report documentation fraud.

Departmental Response: **Agreed**
The department agrees with the recommendation and recognises the importance of strong systems to identify, report and respond to documentation fraud.

Existing arrangements include integrity training, fraud reporting pathways, compliance reporting systems, document authentication processes, electronic certification initiatives, integrity and compliance frameworks, and ongoing expansion of digital verification capabilities.

The department has invested in specialist document examination equipment to support officers when assessing documentation and certificates. While these tools provide a mechanism to assist officers to consider and determine document authenticity, they are decreasing in utility as trade systems are digitised and fraud methodology moves to the use of AI. AI and digital document forensic tools are quickly becoming the prominent capability to detect anomalies early.

DAFF will consider opportunities to prioritise emerging digital document-verification capability, including AI-assisted forensic tools that may support earlier identification of anomalies and assist officer judgement. As part of this work DAFF will engage with other agencies with relevant specialist capability.

Recognising the rating of this recommendation, the department will prioritise opportunities to strengthen document verification and assurance capabilities to identify, report and respond to documentation fraud while broader reforms are progressed.

Recommendation 8 – Major
Recommendation:
The department considers the viability of the expansion of the CCV scheme and ensures these inspections are seen as a priority. Further the department examines ways in which it can reduce the predictability of its processes and improve verification and assurance.

Departmental Response: **Agreed**
The department agrees with the recommendation and recognises the importance of strengthening verification activities to enhance confidence in biosecurity controls across import pathways.

BOCG currently implements a range of Cargo Compliance Verification (CCV) activities and has recently updated our policy and practices.

The department's Compliance and Enforcement Division will embed CCV efforts into our program of regulatory assurance activities, including consideration of annual priorities for targeting alongside our randomised inspections.

Appendix 2: Manufacturers' Declarations

Manufacturers' declarations carry a significant portion of the evidentiary load within the biosecurity system. In many cases, they are the only document used to demonstrate that a risk mitigation step has occurred (e.g. heating, treatment, processing), or that goods meet a low-risk threshold (e.g. containing less than 10% dairy). As such, they are widely used and embedded across BICON pathways.

It is neither practical nor desirable for the department to inspect or test every good entering Australia. The use of documentary evidence is therefore appropriate and necessary within a risk-based system. However, departmental processes and practices governing the use of manufacturers' declarations introduce inherent structural risks. These risks arise not from individual errors, but from the way the system is designed to rely on unverified third-party attestations.

This is reflected in feedback from both internal and external stakeholders which suggests that these risks are already well recognised in practice. Officers assessing manufacturers' declarations have questioned their value as an assurance mechanism, noting that the process can become a 'tick and flick' exercise where required wording is confirmed without meaningful verification. External stakeholders, including brokers, have highlighted challenges in obtaining declarations that meet departmental requirements, particularly in complex or opaque supply chains. These challenges appear to be more pronounced in certain international contexts, where documentation standards and commercial practices differ.

Manufacturers' declarations are most effective where there is a direct and transparent relationship between manufacturer and importer. This is increasingly not the case. Modern supply chains are often multi-layered, commercially sensitive, globally distributed, and involve multiple intermediaries.

Requiring a manufacturers' declaration assumes a level of transparency that may not exist in practice. Suppliers may be unwilling to provide manufacturer details due to commercial sensitivities and the risk of being bypassed. As a result, declarations may be incomplete, inaccurate, or difficult to obtain.

At the core of the issue is that the system cannot distinguish between genuine compliance and "paper compliance". There is no reliable way to determine whether goods have been treated as described, or whether the declaration simply contains the wording required by BICON. In effect, the system treats these as equivalent.

This is compounded by the limited verification applied to both the claims within these documents and the documents themselves. Where declarations meet prescribed wording requirements, there is generally no prompt for additional verification. There are no systematic checks to confirm that:

- the manufacturer exists,
- the document originates from that manufacturer, or
- the stated processes have occurred.

While officers receive training in identifying fraudulent documents, this training is typically delivered early in employment. There is no requirement for refresher training, and the training provided is largely introductory in nature, with limited opportunity for officers to build deeper capabilities.

Responsibility for the accuracy of manufacturers' declarations also sits primarily with entities outside the department's regulatory reach. Manufacturers are typically offshore, have no formal relationship with the department, and cannot be easily subject to compliance or enforcement

action. In contrast, it can be argued that it is reasonable for importers to rely on the information provided to them by manufacturers, creating a gap in accountability.

Taken together, a manufacturer's declaration can be characterised as a document that:

- may be difficult to obtain,
- is subject to minimal verification,
- can be readily fabricated, and
- is produced by an entity outside departmental jurisdiction.

As a result, manufacturers' declarations may provide the appearance of compliance without reliably demonstrating that biosecurity risk has been mitigated. Goods may therefore be granted entry on the basis of documentation that provides limited assurance of either risk mitigation or low-risk status.

If the system cannot distinguish between declarations that reflect actual compliance and those that simply replicate required wording, it raises questions as to whether manufacturers' declarations continue to provide meaningful assurance. The challenge remains of how, in their absence, efficient and effective assurance of the management of biosecurity risk could be achieved.

This paper does not propose a preferred policy response. Instead, it outlines considerations for the department in reviewing the role of manufacturers' declarations within documentation pathways.

If the department wishes to retain manufacturers' declarations, it may consider options to strengthen verification and support officers in assessing their reliability. Potential measures could include:

- introducing light-touch verification steps (e.g. confirming the existence of a manufacturer at a stated address)
- increasing random verification approaches particularly with higher risk products that might include testing of samples
- embedding fraud detection expectations within work instructions
- providing periodic refresher training for officers; and
- developing simple checklists to support consistent assessment practices.

These measures would require policy consideration and may not be appropriate across all pathways.

It is acknowledged that comprehensive verification based on documentation alone may not be feasible, particularly given language, cultural, and international system constraints. However, verification does not need to be exhaustive to be effective. Even limited measures may introduce friction for false declarations, increase visibility of fraud detection processes, and improve consistency of decision-making.

An alternative approach may be to consider greater reliance on importer declarations. Importers would be required to undertake their own verification of ingredients and/or manufacturing processes and could be subject to audit. Many large brands and distributors already undertake these kinds of audits of manufacturers. This would shift responsibility to a regulated entity within Australian jurisdiction, enabling clearer accountability and potential compliance action. This would shift assurance from upstream production claims to downstream accountability, changing rather than eliminating risk. It may also reduce the need for officers to assess manufacturer-level claims that are difficult to verify. This option would require further policy consideration and may not be suitable for all pathways.

Appendix 3: BICON pathways Case Study

The following scenarios are fictional and are provided for illustrative purposes. They do not reflect actual events, cases, or people. All names have been randomly generated and are not intended to represent any current or former departmental staff. While hypothetical, the scenarios have been developed to demonstrate outcomes that could occur in practice.

River is looking to import wool weed matting for sale in their nursery. The product is sold under the brand name "Land Weave Geotextiles". It will come in ready retail packaging (from crate to shelf), but a retail package is quite large (around 1 metre long, 70cm wide and 12kg). River connects with a supplier and broker and arranges their first importation.

Scenario 1

Sam, a department assessment officer, opens CWMS and receives River's consignment. The goods have been lodged and described as "weed matting". The only CP risk recorded in AIMS is "high risk".

Sam has not seen this product before, so searches "weed mat" in BICON.

There are 101 results. The top results, in order of appearance, are:

Dried herb products not for human consumption
Dried herbs for human consumption
Permitted plant fibres
Preserved fruit, vegetables, seaweed or truffle paste for human consumption
Algae species that are weeds
Plant species that are weeds
Plant material for research purposes
Geotextiles

Geotextiles is the first case that appears relevant, so Sam selects it.

While there is no mention of "wool" in this BICON case it does refer to "permitted natural fibres". Sam thinks of wool as a natural fibre so continues with the pathway.

System prompt:

[Will the geotextiles be used for erosion control, weed suppression or landscaping?]

Sam selects "Yes" to this question as it will be used for weed suppression and continues.

System prompt:

[To demonstrate compliance with this requirement you must present the following on a Manufacturer's declaration, Supplier's declaration, Product label, Phytosanitary certificate, Packing list, Bill of Lading or Commercial invoice:

i. 1. The botanical or common name of the plant material.
2. Identification, or the intended end use, of the article.

Is the evidence provided OK?]

There is no documentation providing a botanical name, as the product does not contain plant material. In previous cases, where requested evidence is not applicable (for example, the wool carbonisation question under the wool fibre case), Sam has been instructed to select "Yes". Sam applies the same approach here and selects "Yes".

As the goods are a full container load (FCL), they are directed for an inspect/unpack.

Inspection Direction

[Inspect goods to ensure freedom from contaminants such as live insects, plant or animal debris, soil or other biosecurity risk material.
A minimum of 2 rows is to be unpacked. Further unpack, as directed by the department, may be required to sufficiently inspect goods.]

At inspection – goods will appear as plastic wrapped rolls, and it will be up to the discretion of the inspecting officer what they look at.

Result of Scenario 1: Inspection and likely release.

Scenario 2

Mae, a department assessment officer, opens up CWMS and receives River's consignment as an assessment. The goods have been lodged and described as "weed matting". The only CP risk recorded in AIMS is "high risk".

While reviewing the documentation in more detail, Mae notices the word "wool".

Mae initially searches for "weed mat" in BICON and reviews the results. She opens the "Geotextiles" case. After a quick review, Mae determines this is not the correct case as the product includes components that are not of plant origin. Mae returns to the search and instead enters "wool".

There are 11 results. The top one is:
Natural fibres (and their derivatives) of animal origin

This appears to be a better fit, so Mae selects the case and proceeds.

System prompt:

[Which of the following best describes the goods?

- Personal use
- Silk or silkworm cocoons (without pupae)
- Wool grease or derivatives (e.g. Lanolin)
- Wool/fibre from sheep, goats or camelids]
- Animal hair, fibre or bristles (other than from sheep, goats or camelids)

Mae selects "Wool/fibre from sheep, goats or camelids.

System prompt:

[Which of the following best describes the goods?

- Please note the definition of Camelid is listed for reference.
- Used products made from wool
- Part of a retail ready and/or finished product (including garnetted wool)
- Wool fibre]

In the documentation provided, Mae saw a statement about the goods being retail ready, so Mae chooses - Part of a retail ready and/or finished product (including garnetted wool).

This selection takes Mae to the import conditions page. The page contains detailed information relevant to the assessment. However, during observations it was noted that assessment officers frequently skipped over this text and proceed directly to the next prompt. In this scenario, Mae does the same.

System prompt:

[The goods must be part of a retail ready and/or finished product (including garnetted wool).

To demonstrate compliance with this requirement you must present the following on an Air waybill, Manifest list, Invoice, Manufacturer's declaration or Product label:
i. A statement that clearly describes the product as being part of a retail ready and/or finished product (including garneted wool) and identifies the consignment to which these goods relate.
Is the evidence provided OK?]

As Mae recalls seeing a statement on the invoice indicating the product is retail ready, she selects "Yes". As the goods are an FCL consignment, they are released without inspection.

However, if Mae had reviewed the import conditions page more closely, she would have seen the following:
"These goods, or any derivatives, must not be distributed, sold or used for:

1. animal consumption,
2. environmental purposes (including use as bioremediation product or fertiliser),
3. growing purposes, or
4. veterinary therapeutic use."

This would have indicated that the selected case may not be appropriate for the intended end use of the product.

In particular, the restriction on environmental purposes directly conflicts with the intended use of weed matting and should have prompted Mae to reconsider the case selection.

Result of Scenario 2: Highly likely goods will be released without inspection

Scenario 3

Eda, a department assessment officer, opens up CWMS and receives River's consignment as an assessment. The goods have been lodged and described as "weed matting". The only CP risk recorded in AIMS is "high risk".

While reviewing the documentation in more detail, Eda notices the word "wool".

Eda searches "wool" in BICON.

There are 11 results. The top one is:
Natural fibres (and their derivatives) of animal origin

This appears to be a suitable match, so Eda selects the case and proceeds.

[Which of the following best describes the goods?

- Personal use
- Silk or silkworm cocoons (without pupae)
- Wool grease or derivatives (e.g. Lanolin)
- Wool/fibre from sheep, goats or camelids]
- Animal hair, fibre or bristles (other than from sheep, goats or camelids)

Eda selects "Wool/fibre from sheep, goats of camelids.

System prompt:

[Which of the following best describes the goods?

- Please note the definition of Camelid is listed for reference.
- Used products made from wool
- Part of a retail ready and/or finished product (including garnetted wool)
- Wool fibre]

Eda decides that “retail ready” is not the best fit and instead selects “Wool fibre”.

System prompt:

[Which of the following best describes the wool fibre?
Please refer to the department’s approved list of capripox free countries.
If it cannot be confirmed that the wool has been sourced, manufactured, and exported from one or more of the countries from the department approved list, please select the country/ies of source, manufacture and/or export are not capripox free answer below.
If your product does not meet the approved scouring/treatment processes or if you want to have a country assessed as capripox free by the department, then select the Other answer below.

- Scoured and less than or equal to 500 g (all countries)
- Unscoured from New Zealand
- Scoured from New Zealand
- The country/ies of source, manufacture and/or export are capripox free (other than NZ)
- The country/ies of source, manufacture and/or export are not capripox free
- Other]

Eda reviews the documentation again. There is some evidence that the wool originated from the United States (a capripox-free country), but the goods were manufactured and exported from China (not capripox free).

Due to the way the options are presented and noting that one element of the supply chain is capripox free, Eda selects “The country/ies of source, manufacture and/or export are capripox free (other than NZ)”.

This selection takes Eda to the import conditions page. The page contains detailed information relevant to the assessment. However, observations have shown that assessment officers may skip this content and proceed directly to the next prompt. In this instance, Eda does the same.

System prompt

[The wool must be sourced, manufactured and exported from a country approved by the department as free from capripox disease.
To demonstrate compliance with this requirement you must present the following on a Government health certificate or Government endorsed manufacturer's declaration:
i. A statement that the wool has been sourced, manufactured and exported from a country approved by the department as free from capripox disease.
Is the evidence provided OK?]

At this point, Eda realises that her previous selection may be incorrect. This issue arises from the ambiguity in the earlier prompt. Eda returns to the previous question and revises her answer, selecting “The country/ies of source, manufacture and/or export are not capripox free”.

Eda then proceeds again, skipping over the import conditions page.

System prompt

[To demonstrate compliance with this requirement you must present the following on a Government health certificate or Government endorsed manufacturer's declaration:
i. A statement that the wool has been commercially scoured, and one of the following:
1. A statement that the wool has been heated to a minimum of 95℃ for at least 30 minutes, or
2. A statement that the wool has been washed in water containing non-ionic detergent (>1 g/litre) at a minimum of 60℃ for at least 60 minutes.
Is the evidence provided OK?]

AND

[ii. If the wool has been carbonised, you must also provide a statement that the wool has been carbonised by the following method:

1. the wool has been passed through a 5-7% sulphuric acid bath, and
2. the wool has been dried at 60-80℃ and then baked at 90-120℃, and
3. the treated wool was then passed through a set of heavy fluted rollers and then placed into a drum roller, and
4. the wool has been passed through a bath that contains soda ash and has been bleached with hydrogen peroxide or formic acid.

Note: If the wool has not been carbonised this requirement does not need to be met.
Is the evidence provided OK?]

Scenario 3a

The government certificates are satisfactory, so Eda selects "Yes" for the first question. The wool has not been carbonised, and as no evidence is required, Eda selects "Yes" for the second question.

This leads to an inspection.

Inspection Direction:

[Inspect at least 5% of the wool consignment to verify freedom from live insects, faecal material and other biosecurity risk material, excluding seed. Due to the carbonisation process, the presence of any seeds in the consignment does not warrant any further treatment.]

Result of Scenario 3a: 5% of product inspected

Scenario 3b

The government certificates are not satisfactory, so Eda selects "No" for the first question. As the wool has not been carbonised and no evidence is required, Eda selects "Yes" for the second question.

The importer is then provided with options to resupply documentation, export, or destroy the goods.

Result of Scenario 3b: Importer has option Destroy or export

Scenario 4

This scenario follows the steps in Scenario 3 up to the wool fibre classification prompt (i.e. where the assessor selects how the wool fibre is described). At this point, the assessor selects "Other".

This brings up the requirement for importer to apply for a permit.

Result of Scenario 4: Import permit required

Appendix 4: Officer Tracking Sheets

An activity that was observed to consume significant officer time was the creation and maintenance of 'tracking sheets'. Even under observation, many assessment officers spent additional time putting data into a tracker, which was usually some form of Excel spreadsheet (although other approaches, like the use of OneNote were observed). While individually minor, this represents a meaningful cumulative time cost when considered across multiple entries, officers and daily workloads.

While no formal work instruction or operating procedure mandates the creation of a tracking sheet, its widespread adoption has resulted in a de facto expectation that may be interpreted as an implicit requirement. Although not universal, based on the limited sample of assessment officers, the practice was consistently observed among those the Inspector-General and team engaged with.

When questioned on the use of these trackers there were a number of different answers provided that generally fell along the themes of them being:

- a quick reference guide ("What did I do with that goat cheese consignment last Tuesday?")
- an audit trail reassurance ("If someone asks, I can show what I did.")
- a workflow memory ("I'm keeping track of what I've processed.")
- personal organisation ("It's easier to record things this way.")
- habit ("I started it when I was in training, and I have just kept doing it.")

Another observation in relation to these trackers was no two appeared identical, with different officers valuing different elements. Some tracked simple details like entry number, commodity and outcome. Others tracked start, finish and total times. Some officers only used the trackers for entries that were out of the ordinary, while others recorded information for every assessment.

Most of the information recorded in the tracker is accessible through existing sources, suggesting these trackers operate as an adaptive response to perceived gaps in current systems. Their ongoing value as a working tool is less evident, with staff reporting that, beyond evidencing completion for initial training, they rarely revisit or reflect on the recorded information, despite continuing to add data. In one case an officer said that he used the sheet "in case I get asked because an entry is wrong" but followed up by saying that "in the past year, I have never been asked."

This behaviour could be a potential signal that:

- the systems' internal record-keeping is insufficient for operational needs
- the systems do not provide the workflow visibility officers feel they need
- officers don't trust the systems to retain the right information
- officers don't know how to access information within the systems
- information within the current systems is not easily or quickly accessible

The data gathered in these trackers could be quite useful for the department on a wider level, rather than just for individual officers. Some evaluation of the value of these trackers could be undertaken, but in their current state, the information is inaccessible and incomparable between different officers.

The Inspector-General considers that the department may take a range of approaches in response to this behaviour.

At one end, the department may determine that no action is required. The use of personal tracking sheets does not appear to directly impact the quality of risk assessment outcomes and may be viewed as a low-level inefficiency that does not warrant intervention.

Alternatively, the department could seek to discourage the practice, particularly beyond its initial use as evidence of completed entries during training. This approach may reduce duplication and promote greater reliance on official systems, but risks removing a tool that officers currently perceive as meeting an operational need.

Further, the observed prevalence of tracking sheets suggests they are fulfilling a function not adequately supported by existing systems or processes. This presents an opportunity for the department to better understand the underlying need driving this behaviour, including requirements for workflow visibility, record-keeping assurance, or ease of access to information.

In this context, the department may wish to explore more structured approaches to dealing with the continued use of tracking sheets, such as developing a standardised form. This could range from introducing a consistent template to enable greater comparability and accessibility of information, through to the use of a small job crafting workshop in which operational staff develop a tracker aligned with actual work practices and identified needs.

Job crafting refers to the ways employees informally adjust how they perform their work to better meet operational needs. As described by Brunning and Campion (2018)[26] one key form is resource crafting, where individuals modify aspects of their job by introducing new tools, reorganising tasks, or drawing on additional resources to reduce workload pressures and improve efficiency.

This behaviour is typically goal-directed, aimed at managing job demands and improving performance by minimising gaps between system design and the practical realities of day-to-day work. It reflects an efficiency-focused response, with employees actively shaping their work environment to better support task completion.

In operational settings, resource crafting can provide clear benefits, including improved workflow management, greater confidence in outputs, and reduced cognitive load. However, when widely adopted in unstructured ways, it can also lead to duplication, inconsistency, and misalignment with official systems.

The use of officer tracking sheets is consistent with this form of job crafting. It represents an adaptive response to perceived limitations in workflow visibility, access to information, and record-keeping assurance, and signals an opportunity to better align system design with user needs.

A co-designed approach, in particular, would allow the department to retain the practical benefits currently derived from personal trackers while reducing inefficiencies, improving consistency, and strengthening alignment with system and policy intent.

The Inspector-General acknowledges that future system upgrades may address some of these issues relating to individual data tracking. However, addressing this behaviour in the interim presents an opportunity to improve operational efficiency, better align system design with user needs, and ensure that current practices are both purposeful and consistent.

[26] Bruning and Campion, *A Role-Resource Approach-Avoidance Model of Job Crafting Theory*, p499-522.