



Australian Government
Inspector-General of Biosecurity

Environmental biosecurity

Management and policy implementation

Review report no. 2025–26/02



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Executive summary

Australia faces growing environmental biosecurity risks from invasive species, driven by global trade, climate change and increased movement of people and goods. These risks are managed through a legislative framework primarily comprising the *Biosecurity Act 2015* and *Environment Protection and Biodiversity Conservation Act 1999*.

The Inspector-General of Biosecurity is responsible for reviewing the performance of functions and exercise of powers by biosecurity officials. The Department of Agriculture, Fisheries and Forestry (DAFF) is Australia's lead agency and the principal regulator for managing biosecurity matters. It co-administers the Biosecurity Act and its subordinate legislation.

While the legislative framework for managing biosecurity risks is robust, its implementation has been hampered by fragmented governance, siloed decision-making and lack of formal collaboration between DAFF and the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

In this report the Inspector-General identifies key systemic issues including:

- lack of a formal memorandum of understanding (MoU) between DAFF and DCCEEW, causing delays, inefficiencies and unclear accountability
- leadership instability and downgrading of the Australian Chief Environmental Biosecurity Officer (ACEBO) role, leading to reduced strategic influence
- stalled implementation of the Exotic Environmental Pest List (EEPL) action plan
- impacts of machinery of government changes, leading to coordination challenges and resourcing challenges.

The Inspector-General recommends reforms to:

- formalise interdepartmental collaboration through an MoU between DAFF and DCCEEW
- strengthen the ACEBO's role and stabilise the Environmental Biosecurity Office
- develop a comprehensive Environmental Biosecurity Strategy and periodic status reports
- finalise and implement the EEPL action plan and ensure regular reviews
- align processes with DCCEEW to reduce duplication and delays.

Review recommendations and departmental responses

The Inspector-General's recommendations address the issues identified in this review. DAFF's full response to the recommendations is also at Appendix A.

Recommendation 1

DAFF should maintain and clarify its leading role in comprehensive biosecurity risk analysis for all specimens of exotic species imported into Australia. To achieve this, led by the Australian Chief Environmental Biosecurity Officer, DAFF must proactively collaborate with the Department of Climate Change, Energy, the Environment and Water, providing necessary technical support (including from entities like the Australian Bureau of Agricultural and Resource Economics and Sciences). This collaboration should ensure that all potential biosecurity risks with environmental significance, are comprehensively and satisfactorily addressed as part of a harmonised process involving both departments.

Department's response: The department accepts the recommendation.

The department will maintain and better clarify its lead role in delivering risk analysis processes in accordance with the *Biosecurity Act 2015*. The department's biosecurity risk policy is based on the assessment and management of pest and disease risk to human, animal and plant health and the environment. The department's risk analysis processes involve consultation and collaboration with stakeholders, and the department regularly reviews these to ensure roles and responsibilities are understood and processes remain transparent, effective and fit for purpose.

The department and the Department of Climate Change, Energy, the Environment and Water (DCCEEW) each have distinct roles in accordance with the *Biosecurity Act 2015*, and the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Acknowledging these respective differences, the department will continue to work collaboratively with DCCEEW to harmonise processes that support the assessment and management of environmental biosecurity risks where appropriate and practicable.

Recommendation 2

DAFF should work closely with DCCEEW to develop processes and policies in the implementation of decisions regarding environmental biosecurity to ensure that regulation under both Acts are fit for purpose and comprehensive.

Department's response: The department accepts the recommendation.

The department will continue to implement legislation, develop and apply policies and processes that protect the environment from biosecurity threats posed by pests and diseases. In doing so, the department will work closely with DCCEEW to ensure a coordinated and consistent approach through each Act, where relevant to environmental biosecurity.

Recommendation 3

DAFF should, as a priority, take a lead in developing a Memorandum of Understanding (MoU) with the Department of Climate Change, Energy, the Environment and Water. The MoU should set out the representation, working relationship, expectations, roles, responsibilities and duties of both departments at strategic, policy and operational levels including in relation to import risk analyses, emergency response to pests and diseases of environmental biosecurity concern, and live animal import policy.

Department's response: The department accepts in principle the recommendation.

The department considers coordinated effort, shared learnings and strategic action for environmental biosecurity is not prohibited in the absence of a MoU with DCCEEW. The Environmental Biosecurity Interdepartmental Group (EBIG) is the formal mechanism for both departments to engage regularly on environmental biosecurity matters. An MoU between agencies is a governance mechanism, that would likely be broader in scope for both departments than environmental biosecurity. The department will, in consultation with DCCEEW, assess the additional benefits of developing a MoU to formally document roles, responsibilities and ways of working between departments. However, we will also ensure that current governance is fit for purpose.

Recommendation 4

DAFF, in consultation with DCCEEW and key stakeholders, must urgently develop and sustainably resource a comprehensive Environmental Biosecurity Strategy, ensuring it is a collaborative blueprint that deeply integrates environmental expertise (internal and external) to protect Australia's natural assets.

Department's response: The department accepts in principle the recommendation.

There are existing individual and overarching strategies that address environmental biosecurity such as the National Biosecurity Strategy 2022–2032 (NBS), which the department plays a key role in delivering, and which already provide a mechanism to deliver on the intent of this recommendation. In consultation with DCCEEW and key stakeholders, the department will consider the need for a collaborative and integrative strategic blueprint specifically for environmental biosecurity outcomes (for example, a Strategic Partnership Statement for both agencies). This will better clarify the Commonwealth's environment biosecurity priorities but linked to existing national strategies. The department considers that this will be a more fit for purpose approach than creating a new strategy and will avoid duplication.

Recommendation 5

As prescribed in the Environmental Biosecurity Framework, the Environmental Biosecurity Office should regularly produce an Environmental Biosecurity Status Report. The status report is crucial to maintain a shared understanding of the current state of environmental biosecurity; guide coordinated action and prioritise efforts against new and emerging threats.

Department's response: The department notes the recommendation.

The department is committed to environmental biosecurity reporting that supports a shared understanding, coordinated action and prioritises emerging threats. The department proposes to include a dedicated Environmental Biosecurity Status Report into planned NBS reporting (with the first NBS Action Plan annual report proposed for early 2026). This will include information on environmental biosecurity risks and actions. This approach will still provide transparency but will be more effective and efficient.

Recommendation 6

The Australian government should stabilise the Environmental Biosecurity Office at a level consistent with that of the Australian Chief Veterinary Officer and Australian Chief Plant Protection Officer roles and strengthen the role of the Australian Chief Environmental Biosecurity Officer to improve overall coordination in environmental biosecurity efforts. Ensuring stability and providing the necessary leadership, resources and cross-departmental integration will enable the government to better protect agriculture and the environment from emerging biosecurity threats.

Department's response: The department accepts in principle the recommendation.

The department is in the process of reclassifying the Australian Chief Environmental Biosecurity Officer (ACEBO) role to a Senior Executive Service (SES) Band 2, consistent with the current Australian Chief Veterinary Officer and Australian Chief Plant Protection Officer positions. The classification of an individual role is determined by the requirements of the position and assessed against the Australian Public Service (APS) Work Level Standards. We are progressing an assessment. If this assessment finds that the ACEBO role meets the criteria for a SES 2 position, we will formally upgrade the position. Pending assessment results, the department will commence a recruitment process for an SES 2 ACEBO position by November 2025.

Recommendation 7

The Australian Chief Environmental Biosecurity Officer should, as a priority, finalise the action plan for the Exotic Environmental Pest List (EEPL). The action plan should include clear timelines, resource allocation and measurable outcomes. This should be supported by a robust framework outlining clear processes in consultation with relevant stakeholders across government, industry and research sectors to ensure effective and efficient execution of the EEPL.

Department's response: The department accepts the recommendation.

The department in consultation with stakeholders, and in collaboration with state and territory governments, is updating and aligning the EEPL Action Plan with current biosecurity strategies. The Action Plan will outline a high-level national work program to identify and prioritise actions to reduce the risk of entry, establishment, and spread of priority exotic environmental biosecurity species in Australia.

Recommendation 8

DAFF should periodically conduct a comprehensive and transparent review of the Exotic Environmental Pest List for currency and appropriateness, and apply updates to reflect new threats, emerging species and changing circumstances so that policies and preventative biosecurity operations remain responsive to the environmental threats.

Department's response: The department accepts the recommendation.

On behalf of all Australian governments, the department commenced a review of the EEPL in August 2025 which is scheduled to be completed in early 2026. The objective of the review is to update the EEPL to reflect emerging or changed risks.



Dr Lloyd Klumpp
Inspector-General of Biosecurity

24 October 2025

1 Conduct of the review

1.1 The Inspector-General of Biosecurity

The Department of Agriculture, Fisheries and Forestry (DAFF) is Australia's lead agency and the principal regulator for managing biosecurity matters. DAFF co-administers the Biosecurity Act and its subordinate legislation. The policy matters relevant to human biosecurity are dealt with by the Department of Health, Disability and Ageing.

The Inspector-General of Biosecurity (Inspector-General) is an independent statutory officer responsible for reviewing the performance of functions and exercise of powers by biosecurity officials under the *Biosecurity Act 2015*. The Biosecurity Act and Biosecurity Regulation 2016 require the appointment of the Inspector-General, establish the Inspector-General's mandate and set out the Inspector-General's relationship with the Director of Biosecurity (the Secretary of DAFF) and the Minister for Agriculture, Fisheries and Forestry.

The Inspector-General's scope covers the elements of Australia's biosecurity system that fall within the remit of DAFF. It does not extend to the elements of the biosecurity system that are the responsibility of state and territory governments and industry and does not cover international trade issues or market access opportunities.

The Inspector-General reviews systems rather than any single performance of a function or exercise of a power by a biosecurity official. Notably, the Biosecurity Regulation 2016 outlines the details of the processes for review, information-gathering and reporting. The Inspector-General prepares review reports that provide assurance over Australia's preventative biosecurity risk management systems and makes recommendations to support their continuous improvement. The Inspectors-General share these reports with the Director of Biosecurity and the Minister for Agriculture, Fisheries and Forestry and publishes these reports at www.igb.gov.au.

1.2 Review objectives

The objectives of this review were to examine the:

- effectiveness of legislative and policy arrangements in achieving intended outcomes for environmental biosecurity
- development and use of the Exotic Environmental Pest List to manage biosecurity risks to the environment.

1.3 Review criteria

The review is guided by 2 primary criteria and 4 sub-criteria, which serve as key questions for evaluation ([Table 1](#)).

Table 1 Review criteria

Criteria	Sub-criteria
1. Are there effective legislative and policy arrangements in place for environmental biosecurity?	i. Is the legislative framework fit for purpose in achieving the intended outcomes for environmental biosecurity?
	ii. Are there effective policy, governance and other organisational arrangements in place to deliver the intended outcomes for environmental biosecurity?
2. How is the Exotic Environmental Pest List (EEPL) used to manage biosecurity risks to the environment?	i. Was there an adequate process for developing the EEPL?
	ii. How does the EEPL contribute to policy formulation, including devising risk mitigation measures for environmental biosecurity?

1.4 Review scope

This review examined DAFF's environmental biosecurity activities between January 2018 and March 2025. The review primarily focused on:

- legislative and policy arrangements, operations and compliance
- development and implementation of strategy, planning and governance
- the development, use and maintenance of the national priority list of exotic environmental pests, weeds and diseases
- biosecurity risk assessments of environmental pests and weeds
- the establishment of the Environmental Biosecurity Office and role of the Australian Chief Environmental Biosecurity Officer (ACEBO)
- integration of environmental biosecurity objectives and risk mitigation across the DAFF's Biosecurity, Operations and Compliance Group.

1.5 Out of scope

The review did not examine:

- DAFF's involvement in areas of the biosecurity system that focus on keeping out pests, weeds and diseases that could adversely impact our environment. This includes surveillance programs; responses to plant, animal, human and marine biosecurity issues; and responses managed under the National Environmental Biosecurity Response Agreement
- the elements of the biosecurity system that are within the remit of state and territory governments, local governments, industry, community groups and other participants in the national biosecurity system
- policies or activities that are the primary responsibility of the Department of Health, Disability and Ageing under the Biosecurity Act
- policies or activities that are the primary responsibility of the Department of Climate Change, Energy, the Environment and Water (DCCEEW) under the *Environment Protection and Biodiversity Conservation Act 1999*
- the management of ballast water.

1.6 Review methodology

During this review, the Inspector-General consulted extensively with key stakeholders within and outside of DAFF. In particular, the Inspector-General:

- conducted a series of meetings with senior executives within DAFF's Biosecurity, Operations and Compliance Group, including the ACEBO, to:
 - communicate the review's objectives and scope
 - identify points of contact within the Inspector-General's support team and DAFF's relevant areas to outline responsibilities
 - identify potential risks related to the review and outline appropriate mitigation strategies
 - obtain initial background information relevant to review objectives, scope and focus areas
 - provide an opportunity to discuss/brainstorm and seek points of clarification about the proposed review process
 - discuss and confirm preliminary and secondary information requirements essential for the review and process of requesting data and information
- discussed with the ACEBO and his team relevant matters concerning environmental biosecurity so that the Inspector-General could obtain a deeper understanding of departmental practices and perspectives
- met with key external stakeholders within DCCEEW, the Centre for Invasive Species Solutions, Wildlife Health Australia and the Invasive Species Council to gather insights and perspectives about environmental biosecurity

- conducted a desk audit of data and documentation (such as standard operating procedures, decision support material, policies, communications material and processes) received from DAFF to identify gaps or areas for improvement, as applicable
- considered potential risks, including whether:
 - DAFF's risk-based methodologies (to detect, identify and control pests, weeds and diseases of environmental significance) are adequate and whether staff and relevant stakeholders apply them correctly
 - DAFF internal mechanisms to identify and respond effectively to environmental risks are timely
 - DAFF has sufficient resources or capabilities available to address relevant current and new or emerging environmental biosecurity risks
 - stakeholders provide DAFF with appropriate or timely information to allow it to carry out its responsibilities
 - DAFF provides stakeholders with appropriate or timely information to allow them to carry out their responsibilities.

As required by the Biosecurity Act, the Inspector-General presented a draft review report to the Director of Biosecurity for departmental consideration. DAFF's response to the review recommendations is included in this report. The Inspector-General also shared a copy of the final report with the Minister for Agriculture, Fisheries and Forestry.

2 Background

2.1 Environmental biosecurity and its significance

Australia's natural resources, including forests, wetlands and marine environments, play essential roles in regulating the climate, maintaining water quality and supporting agriculture. Australia is home to a vast array of native flora and fauna, many of which are found nowhere else on the planet. To preserve the nation's unique biodiversity, ecosystems and cultural heritage, it is vital that we protect Australia's environment from invasive, exotic pests, diseases and weeds.

Invasive species have threatened ecosystems across the globe, leading to biodiversity loss, ecosystem degradation and, in some cases, the extinction of native species. The economic impact of exotic pests is significant, as they can damage crops, forests and fisheries, leading to costly management and eradication efforts. For example, by the 2040s, the National Red Imported Fire Ant eradication program will cost Australia more than \$22 billion (Le and Campbell 2024).

Australia's agricultural biosecurity is central to our reputation as a producer of clean and safe produce, giving our agricultural goods a competitive advantage in the global market. Australia is free of many pests and diseases that are common around the world. Our world-class biosecurity system and strict import requirements manage the risks to our agricultural industries and help to maintain this advantage.

Notably, in the Australian agriculture ministers' response to an independent review of the capacity of the national biosecurity system and its underpinning intergovernmental agreement, they acknowledged that it will become more challenging to manage biosecurity risks in the future. It is expected that Australia will face significant increases in the number of passenger, shipping and containerised cargo arrivals between 2024 and 2050, and this will be a major part of this challenge (BITRE 2022).

Australia's environmental biosecurity is also an important part of our economy and way of life. Craik et al. (2017) defined the 'environmental biosecurity' as 'the protection of the environment and/or social amenity from the risks and negative effects of pests and diseases entering, emerging, establishing or spreading to Australia'. Invasive species can disrupt recreational areas, diminish the beauty of national parks and limit outdoor activities such as hiking, fishing and camping.

2.2 Challenges in managing environmental biosecurity

The challenges of managing our environmental biosecurity are unique. For example:

- *Biodiversity*: The environment has far more species and ecosystems than agriculture does.
- *Knowledge gaps*: There is less understanding of environmental assets than of agricultural assets.
- *Species of concern*: There are more pests, diseases and weed species of concern in the environment than in agriculture.
- *Economic impact*: The economic consequences of agricultural biosecurity threats are more readily quantifiable.
- *Impact prediction*: It is harder to predict the impact of exotic species on the environment.
- *Complexity*: The size and complexity of the natural environment make management more challenging.
- *Surveillance*: Environmental surveillance is more difficult than agricultural monitoring.
- *Resource limitations*: Given the number of species that are potential threats to the environment, resources for environmental biosecurity are more limited than for agricultural biosecurity.

2.3 Past reviews and inquiries into environmental biosecurity in Australia

Over the past decade, several key reviews and inquiries have focused on strengthening Australia's environmental biosecurity. A high-level overview of key reviews and inquiries is presented below.

2.3.1 Senate inquiry, 2022

In 2022, the Senate’s Rural and Regional Affairs and Transport References Committee (RRATRC 2022) conducted an inquiry into the adequacy of Australia’s biosecurity measures and response preparedness with respect to foot-and-mouth disease and varroa mite. The inquiry identified environmental biosecurity as an issue of concern and concluded that:

- environmental biosecurity deserves ‘further scrutiny in the right forum’
- there is significant benefit from biosecurity funding being adequately and appropriately allocated to reflect the interconnectivity and risk profiles across animal, plant, environmental and even human health and biosecurity.

2.3.2 Inspector-General of Biosecurity, 2019

In 2018–19, the then Inspector-General of Biosecurity conducted a review of environmental biosecurity risk management in Australia (IGB 2019a). The review examined:

- how DAFF participates in the broader biosecurity system to address environmental biosecurity concerns
- the processes DAFF uses to identify gaps in pathway and risk analyses and to improve environmental biosecurity information gathering and sharing between jurisdictions.

The former Inspector-General made 7 recommendations, including:

- improved collaborative arrangements between the federal agriculture (DAFF) and environment (DCCEEW) departments, clarifying responsibilities through the development of a memorandum of understanding
- improved prioritisation of environmental biosecurity threats and enhanced surveillance (IGB 2019a).

2.3.3 Priorities for Australia’s biosecurity system, 2017

In 2015, Australian agriculture ministers initiated an independent review of the national biosecurity system and the Intergovernmental Agreement on Biosecurity. The review report, published in 2017, examined the capacity of the national biosecurity system and its underpinning intergovernmental agreement (Craik et al. 2017). It identified key challenges, assessed effectiveness of current practices and made 42 recommendations, some of which focused on environmental biosecurity.

The then Australian Minister for Agriculture, Fisheries and Forestry agreed to develop a national response to the report recommendations, which concluded that environmental biosecurity had long been treated as subordinate to agricultural biosecurity. The response recommended:

Jurisdictions should institute formal arrangements between agriculture and environment agencies ... [recommendation 7].

... a clear definition of environmental biosecurity ... [recommendation 8].

The Australian Government should establish the senior, expert position of Chief Community and Environmental Biosecurity Officer within the environment department. A far less preferred alternative is to house the position in the agriculture department [recommendation 9].

2.3.4 Senate inquiry, 2015

In June 2014, the Senate referred the adequacy of arrangements to prevent the entry and establishment of invasive species likely to harm Australia's environment, and Australia's state of preparedness for new environmental incursions, to the Senate Environment and Communications References Committee for inquiry and report (ECRC 2015). This was the first formal national inquiry devoted solely to Australian environmental biosecurity.

In May 2015, the committee released a report making 26 recommendations to address gaps in the management of Australia's environmental biosecurity. The 2 key recommendations relevant to this Inspector-General review are:

[Recommendation 1] The committee recommends that, once established, the Inspector-General of Biosecurity conduct a systematic review of how effectively high-risk environmental biosecurity concerns are addressed within the broader biosecurity system, with a particular focus on identifying gaps in pathway and risk analyses and on improving information gathering and sharing between jurisdictions.

[Recommendation 9] The committee recommends that the Department of the Environment work with the Department of Agriculture to develop and publish a national priority list of pests and diseases not yet established in Australia that are of environmental biosecurity concern.

3 International obligations

International environmental agreements play a crucial role in coordinating global cooperation to address environmental challenges that transcend national borders. As the world faces escalating issues such as climate change, biodiversity loss, pollution and deforestation, these agreements provide frameworks for cooperation and collective action among nations. They establish binding commitments, set standards and promote the sustainable management of natural resources, facilitating collaboration in the pursuit of a healthier planet.

The Australian Government has significant obligations under various international agreements aimed at protecting the environment. These agreements shape national policies and guide Australia's approach to biosecurity, conservation and biodiversity.

The Biosecurity Act gives effect to Australia's international rights and obligations under the World Trade Organization's Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement), the International Convention for the Control and Management of Ships' Ballast Water and Sediments, the Convention on Biological Diversity (CBD) and other international agreements and conventions.

3.1 SPS Agreement

The SPS Agreement aims to protect human, animal and plant life or health by ensuring that food safety and biosecurity regulation are scientifically justified. The agreement allows countries to set their own standards for health protection, but these measures must be based on scientific risk assessments and should not unjustifiably restrict international trade.

Notably, the SPS Agreement introduces the concept of an 'appropriate level of protection' (ALOP). The term refers to the level of risk a country is willing to tolerate to protect human, animal or plant life and health or the environment. Australia's ALOP, defined in the Biosecurity Act, is expressed as:

... a high level of sanitary and phytosanitary protection aimed at reducing biosecurity risks to a very low level, but not to zero.

Each country that is a signatory to the WTO's SPS Agreement can define its ALOP but must apply it consistently across similar risks to ensure that measures to protect human, animal and plant life or health are based on scientific principles and do not create unnecessary barriers to trade. The SPS Agreement encourages member countries to harmonise their measures with international standards, such as those set by the Codex Alimentarius, World Organisation for Animal Health and the International Plant Protection Convention.

3.2 Convention on Biological Diversity

The CBD aims to conserve biological diversity, promote sustainable use of its components and ensure the benefits of utilisation of genetic resources are shared fairly and equitably. It recognises the intrinsic value of biodiversity and its critical role in maintaining ecosystems, supporting human wellbeing and driving economic development.

The CBD encompasses all ecosystems, species and genetic resources. It focuses on global cooperation to address biodiversity loss, ecosystem degradation and climate change. It explicitly states (at Article 8(h)) that 'Each Contracting Party shall, as far as possible and as appropriate: ... prevent the introduction of, control or eradicate those alien species which threaten ecosystems, habitats or species'.

Currently, 196 countries are parties to the CBD, making it a crucial global environmental agreement. In December 2022, parties to the CBD adopted the Kunming–Montreal Global Biodiversity Framework. The framework is the most significant global agreement on biodiversity in a decade and is guiding biodiversity action internationally and in Australia to halt and reverse biodiversity loss by 2030.

Australia has updated its National Biodiversity Strategy and Action Plan, known as Australia's Strategy for Nature 2024–2030, to guide Australia's contribution to this framework. The strategy establishes 9 priority areas to address the key drivers of biodiversity decline in Australia and sets a national target to 'eradicate or control invasive species in priority landscapes and further minimise their introduction by 2030'. Implementation at the national level will be tracked to measure Australia's overall progress towards meeting our commitments (Commonwealth of Australia 2024).

3.3 International Union for Conservation of Nature

Founded in 1948, the International Union for Conservation of Nature (IUCN) is a global authority on nature conservation and the sustainable use of natural resources. The IUCN's mission is to promote solutions that safeguard biodiversity, support ecosystems and ensure the sustainable use of natural resources for the benefit of people and nature. It brings together governments, civil society organisations, scientists and experts to address environmental challenges.

The IUCN is best known for its Red List of Threatened Species (Red List) – a comprehensive inventory that assesses the global conservation status of species. The IUCN also plays a crucial role in shaping international environmental policies, providing scientific data and guiding sustainable development initiatives.

Australia adheres to IUCN guidelines, particularly on species conservation and protected areas. The government implements the IUCN's Red List criteria to identify and conserve threatened species, manage key habitats and ensure sustainable use of natural resources.

3.4 Convention on International Trade in Endangered Species of Wild Fauna and Flora

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) is a global agreement aimed at ensuring that international trade in wildlife does not threaten species' survival. Established in 1973, CITES is used to regulate trade in more than 40,000 species of animals and plants, including their parts and derivatives. It works through a permit and certificate system that classifies species into 3 groups based on their conservation status and the level of protection required.

By promoting sustainable trade practices and cooperation among nations, CITES plays a critical role in biodiversity conservation, helping to reduce illegal trafficking and overexploitation of wildlife. Australia regulates the trade of endangered species, ensuring it does not harm species' survival. The government enforces CITES through national laws like the *Environment Protection and Biodiversity Conservation Act 1999*, which sets out Australia's system for managing permits for the export and import of protected species. The Australian Government, through DCCEEW, also manages wildlife trade arrangements, which includes licensing systems and compliance measures.

4 National framework

The national Environmental Biosecurity Framework is an essential component of Australia's biosecurity system, protecting the environment from harmful biosecurity threats. The framework protects Australia's unique biodiversity and ecosystems by fostering collaboration, using a risk-based approach and emphasising prevention, early detection and adaptive management. This dynamic and collaborative framework engages a range of stakeholders, including governments, industries, researchers and communities, to ensure the long-term protection of Australia's natural environment from biosecurity risks. It encompasses people, critical infrastructure, technology, partnerships, processes and regulatory activities that work together cohesively.

4.1 National Biosecurity Committee

The National Biosecurity Committee (NBC) is Australia's peak intergovernmental biosecurity body. It is responsible for managing a national, strategic approach to all biosecurity threats, including terrestrial and aquatic, plant and animal pests and diseases, and their impacts on agriculture, the environment, community wellbeing and social amenity. It also implements the [Intergovernmental Agreement on Biosecurity](#) (IGAB). The NBC reports to the Agriculture Senior Officials Committee and the Agriculture Ministers' Meeting.

The NBC is supported by 6 sectoral committees and a biosecurity and agricultural emergency network with secretariats from DAFF:

- Animal Health Committee
- Plant Health Committee
- Marine Pest Sectoral Committee
- National Biosecurity Communication and Engagement Network
- Environment and Invasives Committee
- National Biosecurity Strategy Implementation Committee
- Biosecurity and Agricultural Emergency Network.

These committees provide policy, technical and scientific advice on matters affecting their sector, covering all pests and disease risks to the terrestrial and aquatic (inland water and marine) animals and plants, and the environment.

From time to time, the NBC forms expert groups and short-term task-specific groups to provide advice and deliver key initiatives.

4.2 Intergovernmental Agreement on Biosecurity

The IGAB is a foundational agreement that underpins Australia's national biosecurity system. It is a formal agreement between the Commonwealth, state and territory governments, outlining their shared roles and responsibilities in managing biosecurity risks across the country.

The first IGAB commenced in 2012. It authorised the NBC to provide the strategic management and oversight of the national biosecurity system and intergovernmental relationships and the operation of the agreement. The 2012 IGAB was reviewed and refreshed in 2017 and commenced in 2019.

In 2024, the Australian Government initiated another review of the IGAB, and a report was released in August 2025.

4.3 The National Environmental Biosecurity Response Agreement

The National Environmental Biosecurity Response Agreement (NEBRA) establishes the national arrangements for responding to an incursion of exotic pests and diseases that impact on the environment and our way of life. It includes arrangements for cost-sharing, to be applied by agreement of the parties where there are no existing arrangements.

4.4 Environment and Invasives Committee

In 2018, in response to the 2017 report *Priorities of Australia's biosecurity system* (recommendation 10 of the Craik review), the NBC established the Environment and Invasives Committee (EIC) to support the Australian Chief Environmental Biosecurity Officer (ACEBO).

The EIC provides national policy leadership on the identification, prevention and management of invasive plant, vertebrate and invertebrate species that adversely impact the environment, economy and community. This applies where there is an environmental or community biosecurity impact and where it is found not to be the responsibility of another NBC sectoral committee.

The EIC's core objectives are to:

- deliver an integrated and effective national approach to the prevention, detection, identification, response and management of emerging and established invasive species that affect the environment, the economy and the community
- support the development and implementation of a nationally consistent and effective approach to biological control programs, activities and associated governance, administrative and legislative processes (where relevant)
- develop and implement national strategies to:
 - ensure a clear governance structure for the management of relevant species of national importance within the national biosecurity system
 - prioritise research, development and extension in invasive species biosecurity
- support national communication and stakeholder engagement on invasive species, including leading engagement with environmental biosecurity stakeholders
- deliver an integrated and effective national approach to the prevention, detection, identification, response and management of emerging and established invasive species that affect the environment, the economy and the community
- support the development and implementation of a nationally consistent and effective approach to biological control programs, activities and associated governance, administrative and legislative processes (where relevant)
- develop and implement national strategies to:
 - ensure a clear governance structure for the management of relevant species of national importance within the national biosecurity system
 - prioritise research, development and extension in invasive species biosecurity.
- support national communication and stakeholder engagement on invasive species and lead engagement with environmental biosecurity stakeholders
- assist the Commonwealth's efforts to meet Australia's obligations under multilateral environmental agreements – the Convention on Biological Diversity and the Sustainable Development Agenda and the Sustainable Development Goals as they relate to environmental biosecurity
- advise the NBC on national invasive species policy issues and the National Environmental Biosecurity Response Agreement.

The EIC is supported by 5 ongoing expert or advisory groups that provide policy, technical and scientific advice on relevant matters. More details about the EIC are available on DAFF's [website](#).

4.5 Department of Agriculture, Fisheries and Forestry

DAFF plays a critical role in protecting the country's environment, agriculture and economy from harmful pests, diseases and invasive species. At a high level, as detailed in [Table 2](#), DAFF's key roles and responsibilities in managing biosecurity risks (which also extend to environmental threats) include the following:

- *Administration of the Biosecurity Act:* DAFF is responsible for implementing and enforcing the Biosecurity Act, which aims to protect Australia's biosecurity by preventing the introduction and spread of harmful pests and diseases. DAFF plays a central role in developing biosecurity policies, processes and systems; and enforces biosecurity policies, frameworks and regulations to ensure (among other things) that environmental biosecurity is effectively managed at the national level.
- *Risk analysis and import assessments:* DAFF evaluates the biosecurity risks that various exotic pests and diseases pose to agriculture; animal, plant and human health; and the environment. As part of this, it conducts specific scientific risk analyses (or assessments) and implements management strategies to mitigate or prevent potential threats associated with the importation of goods, people, cargo and conveyances into Australia.
- *Border biosecurity control measures:* DAFF conducts inspections, provides certification services and implements biosecurity measures at seaports, airports, mail facilities and approved arrangement premises for the movement of goods and conveyances into Australia.
- *Surveillance and early detection:* DAFF conducts, facilitates and/or supports surveillance at first points of entry, ports and approved arrangement premises and high-risk entry/establishment sites to detect potential biosecurity and human disease threats. This includes both general surveillance and targeted programs.
- *Emergency management:* DAFF coordinates responses to national biosecurity emergencies and incidents (for example, pest or disease outbreaks) in accordance with nationally agreed emergency response agreements to protect plant and animal health and the environment. It also ensures Australia meets international reporting obligations for emergency plant and animal diseases and market access for trade.
- *Collaboration with other Commonwealth departments and state and territory governments:* DAFF provides national leadership and collaborates with other Commonwealth departments, such as DCCEEW, the Department of Defence and the Department of Home Affairs, as well as state and territory governments, industries and environmental groups, to develop, implement and enforce policies and programs that protect and conserve the environment.
- *Compliance and enforcement:* DAFF ensures compliance with biosecurity laws, conducts inspections, and enforces legislation to prevent the unlawful entry of exotic pests and diseases.
- *Engagement with First Nations people:* DAFF works on empowering First Nations leadership in biosecurity, integrating traditional knowledge into forest and pest management and building partnerships that respect cultural values and environmental stewardship.
- *Research and development:* DAFF, through the Environmental Biosecurity Office, funds research through programs such as the Environmental Biosecurity Project Fund for research and innovation projects that help protect Australia from exotic environmental pests, weeds and diseases.
- *Public education and awareness:* DAFF is involved in educating travellers, the general public and industries about biosecurity risks and encouraging responsible behaviour to help prevent the introduction, establishment and spread of exotic pests, diseases and weeds that threaten Australia's environment.

4.6 Department of Climate Change, Energy, the Environment and Water

DCCEEW plays a key role in environmental biosecurity by coordinating policies and strategies to safeguard biodiversity, ecosystems and water resources. It also works collaboratively with other agencies to ensure that environmental risks that could impact Australia's environment and economy are managed effectively ([Table 2](#)). DCCEEW's key roles and responsibilities in managing biosecurity risks include the following:

- *Administration of the EPBC Act:* DCCEEW is responsible for managing the EPBC Act, which aims to protect Australia's environment, including its biodiversity, heritage and natural resources.
- *Environmental protection and conservation:* Under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), DCCEEW focuses on protecting and conserving nationally significant environmental assets, including threatened species and ecological communities; and critical habitats.

- *Regulation of invasive species:* DCCEEW manages aspects of environmental biosecurity related to invasive species, particularly those that threaten biodiversity and natural ecosystems.
- *Environmental impact assessments:* DCCEEW assesses and approves projects or activities that may impact matters of national environmental significance (such as threatened species, migratory species and World Heritage sites).
- *Collaboration with DAFF on biosecurity:* DCCEEW works with DAFF to ensure that biosecurity measures also consider environmental impacts, such as preventing the entry, establishment and spread of invasive species or diseases that threaten ecosystems.
- *Conservation and national biodiversity:* DCCEEW implements Australia’s obligations under international environmental conventions, such as the Convention on Biological Diversity, to manage and conserve native biodiversity and ecosystems.

[Table 2](#) also summarises the way the 2 agencies work together in managing environmental biosecurity risks.

Table 2 Overview of roles and responsibilities of DAFF and DCCEEW in managing environmental biosecurity risks in Australia

Area of responsibility	DAFF	DCCEEW
Cross-agency coordination and national biosecurity strategy	Both agencies participate in developing national frameworks for biosecurity and environmental protection, ensuring that biosecurity risk management is integrated into broader environmental and conservation policies. The National Biosecurity Strategy (2022), agreed by all agricultural ministers, outlines Australia’s overall approach to biosecurity. The National Biosecurity Committee oversees the strategy’s implementation, with coordination support provided by DAFF. DCCEEW plays a role in incorporating environmental and biodiversity considerations into biosecurity decision-making.	
Shared responsibilities in environmental biosecurity	Responsible for management of biosecurity risks related to plant, animal and human health, and the environment. Oversees the development and implementation of national biosecurity policies, legislative frameworks (such as the Biosecurity Act) and response plans.	Leads the integrated delivery of the Australian Government’s agenda for environmental protection, conservation of biodiversity, and addressing climate change. Plays a key role in managing threats that affect Australia’s native flora and fauna, ecosystems and environmental health, particularly in relation to the impacts of invasive species and diseases that threaten biodiversity.
Invasive species management and biodiversity protection	Manages the risks associated with invasive species at the border (through biosecurity measures), conducts surveillance and coordinates responses to biosecurity emergencies.	Responsible for meeting Australia’s obligations under multilateral environmental agreements and administering the Environment Protection and Biodiversity Conservation Act, which includes protecting matters of national environmental significance (including threatened species) and recognising key threatening processes, including threats posed by invasive species.
Climate change and biosecurity risks	Assesses the biosecurity implications of climate change in relation to agriculture, environment and trade, ensuring that policies consider how changing climatic conditions might affect the spread of diseases and pests.	Considers climate mitigation, adaptation and threats/risks, with a particular focus on the environment, including interactions between climate change and severe weather, biosecurity risks and biodiversity assets.

Area of responsibility	DAFF	DCCEEW
Surveillance, early detection and response	Manages the national surveillance systems that monitor biosecurity threats, including early detection programmes that focus on priority exotic invasive species and diseases entering Australia through trade, travel and natural pathways.	Complements DAFF's efforts, with a particular focus on implementing obligations under multilateral environmental and heritage agreements and matters of environmental significance (see sections 4.6 and 5.2).
Research and scientific collaboration	Funds research through programs such as the Environmental Biosecurity Project Fund for research, innovation and public education projects that help protect Australia from exotic environmental pests, weeds and diseases, with focus on agricultural biosecurity and invasive species management.	Supports research into the environmental impacts of biosecurity threats and helps fund initiatives to protect biodiversity through programmes like the National Environmental Science Programme.
Public education and stakeholder engagement	Runs biosecurity awareness campaigns targeting industries, travellers, and the general public.	Engages with environmental organisations, local communities, and conservation groups to promote sustainable practices and the protection of ecosystems from biosecurity risks.

4.7 Joint responsibilities

Consistent with the Biosecurity Act and the EPBC Act, respectively, both DAFF and DCCEEW collaborate on environmental biosecurity management to protect Australia's natural environment, cultural assets and social amenities from the harmful impacts of exotic and established pests, weeds and diseases. These activities include the following:

- *Integrated biosecurity and environmental management:* The departments collaborate on managing biosecurity risks that impact both agriculture and the natural environment, ensuring alignment between achieving the objectives of the Biosecurity Act and the EPBC Act where practical.
- *Emergency response coordination:* The departments work together to respond to environmental biosecurity incidents which may fall under NEBRA or be off deed, such as pest or disease outbreaks, that affect biodiversity or ecosystems.
- *Policy and strategy development:* Both departments jointly contribute to the development of national strategies and policies to manage invasive species and protect environmental assets.

5 Legislative framework

Australia's legislative framework for managing environmental biosecurity risks is robust, encompassing a national approach underpinned by federal and various state/territory laws. These laws, alongside international agreements, guide the assessment and management of biosecurity risks of invasive species, diseases and other environmental threats. The framework helps to coordinate actions that federal and state/territory governments, industries and other stakeholders take to protect Australia's unique natural environment. The management of import risk is largely conducted under the Biosecurity Act and the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

DAFF administers and enforces provisions of the Biosecurity Act relating to plant health, animal health, human health and environmental biosecurity. However:

- The Department of Health, Disability and Ageing is responsible for developing policies for exercising human biosecurity powers pre-border, at-border and post-border, including risk prevention and mitigation activities addressing domestic community transmission of Listed Human Diseases. It also coordinates communicable disease control activities and health emergency response across the country (IGB 2021a).
- DCCEEW is responsible for environmental protection and conservation under the EPBC Act, although the Biosecurity Act and the EPBC Act contain different definitions of the term 'environment' ([Box 1](#)).

Box 1 Definitions of the 'environment' in the Biosecurity Act and the EPBC Act

Section 9 of the Biosecurity Act defines 'environment' to include:

- ecosystems and their constituent parts
- natural and physical resources.

Similarly, in line with the objects of the Act in section 4, the Biosecurity Act provides for the management of biosecurity risks, which includes the potential for diseases or pests to cause harm to the environment.

In contrast, section 528 of the EPBC Act provides a comprehensive definition of 'environment', which includes:

- ecosystems and their constituent parts, including people and communities
- natural and physical resources
- the qualities and characteristics of locations, places and areas
- heritage values of places
- the social, economic and cultural aspects of these elements.

This difference in definitions creates ambiguity in environmental biosecurity governance, particularly when assessing risks that affect ecosystems, heritage values or cultural aspects. The different definitions make it difficult to align risk assessment frameworks across the 2 Acts, leading to inconsistencies and inefficiencies in decision-making.

5.1 Biosecurity Act 2015

The Biosecurity Act:

- is the primary piece of national legislation governing biosecurity in Australia, including environmental biosecurity
- provides the foundation for the country's biosecurity system, detailing the roles, responsibilities and powers of the Commonwealth in managing biosecurity risks
- establishes a system for risk assessments, quarantine measures and emergency response for biosecurity threats
- stipulates requirements and regulatory powers to manage biosecurity risks associated with the importation of goods and the movement of people and conveyances entering Australian territory
- gives effect to Australia's international rights and obligations, including the Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement), the International Convention for the Control and Management of Ships' Ballast Water and Sediments and the Convention on Biological Diversity, among others.

5.2 Environment Protection and Biodiversity Conservation Act 1999

The EPBC Act is the key piece of legislation for managing Australia's environment. Its function is to protect native species and ecosystems from environmental threats such as invasive species, diseases and habitat destruction.

The EPBC Act:

- provides a framework for protecting biodiversity and managing the impacts of human activities on the environment, including the regulation of invasive species and associated biosecurity risks
- provides powers to list and manage environmental weeds and invasive species that threaten biodiversity. The Act includes provisions for environmental impact assessments, which can address potential biosecurity risks posed by invasive species or harmful pests
- allows for the development of National Threat Abatement Plans, which set out actions to reduce the risks posed by specific threats to biodiversity (for example, invasive species or diseases). These plans play a role in environmental biosecurity by coordinating efforts to control and manage biosecurity threats to native species and ecosystems.

The EPBC Act protects certain nationally significant (protected) animals, plants, habitats or places ('protected matters'). Under the EPBC Act, the Australian Government is responsible for protecting matters of national environmental significance. The states and territories are responsible for matters of state and local significance.

Matters of national environmental significance are living things (including plants and animals), habitats and places that need to be protected. There are 9 matters of national environmental significance:

- World Heritage areas
- National Heritage places
- wetlands of international importance (listed under the Convention on Wetlands of International Importance, otherwise known as the Ramsar Convention)
- listed threatened species and ecological communities
- listed migratory species (protected under international agreements)
- Commonwealth marine areas
- Great Barrier Reef Marine Park
- nuclear actions (including uranium mines)
- water resources (that relate to coal seam gas development and large coal mining development).

The EPBC Act also stipulates that the environment must be protected when actions are taken:

- on Commonwealth land or impact upon Commonwealth land
- by an Australian Government agency anywhere in the world, and/or that impact Commonwealth heritage places overseas.

5.2.1 Live Import List

Certain live pets or agricultural animals can be imported into Australia but only after meeting stringent health, quarantine and monitoring requirements. Under the EPBC Act, the Minister for the Environment and Water is required to establish 'the list of specimens taken to be suitable for live import' (called the 'Live Import List'). Plant and animal specimens considered to be suitable for live import into Australia are listed on the Live Import List.

Section 303EB of the EPBC Act controls the importation of live animals and plants and stipulates that a 'comprehensive environmental risk assessment must be undertaken that demonstrates that the specimen does not pose an unacceptable level of risk to the Australian environment' before the Live Import List can be amended to include a new specimen. Therefore, under the EPBC Act, the Live Import List is a legislative instrument. A live specimen that is not included on the Live Import List cannot be imported under the EPBC Act. The Live Import List, published on DCCEEW's website, is a living document and is frequently amended to add or remove new species, update scientific names and refine import conditions.

The Live Import List can only contain specimens that are live plants or live animals. The following definitions apply in accordance with Part 23 of the EPBC Act:

- 'Animal' means any member, alive or dead, of the animal kingdom (other than a human being).
- 'Live animal' includes animal reproductive material.
- 'Plant' means a member, alive or dead, of the plant kingdom or of the fungus kingdom and includes a part of a plant and plant reproductive material.
- 'Live plant' includes plant reproductive material.

Import permit

The Live Import List is divided into 2 parts described in section 303EB of the EPBC Act and at the start of Parts 1 and 2 of the Live Import List.

Part 1 is a list of live specimens that do not require an import permit under the EPBC Act. The EPBC Act describes Part 1 as 'a list of unregulated specimens', which:

- includes species of animals and plants suitable for live import
- contains specimens that were approved for release before 1 May 1984 under the (now repealed) *Quarantine Act 1908* for the purpose of biological control
- must not contain Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) specimens
- includes live plants the importation of which is consistent with the Biosecurity Act
- includes live animals the importation of which is largely unrestricted under the EPBC Act. However, some restrictions apply for some taxa.

Part 2 is a list of live specimens that require an import permit under the EPBC Act. The EPBC Act describes Part 2 as 'a list of allowable regulated specimens'. Part 2:

- includes species of animals and plants suitable for live import
- contains any live plant included in the CITES list provided the importation of the plant is consistent with the Biosecurity Act
- contains specimens that, before the commencement of section 303EB, were granted an import permit under the *Wildlife Protection (Regulation of Exports and Imports) Act 1982*. In other words, specimens that were subject to import regulation under this Act were transferred to the Live Import List at the commencement of the EPBC Act.

Specimens may be subject to conditions and restrictions on quantity and size limits and the source of a specimen, among other things. For example, sturgeon has been added to Part 2 of the Live Import List. It is subject to 2 conditions: the importation is permitted only for commercial aquaculture; and a secure recirculating system must be used in aquaculture to manage the risk of sturgeon escaping into the wild (DAFF 2024).

The EPBC Act controls the importation of live specimens, as these can damage the integrity of Australian ecosystems and threaten biodiversity. DCCEEW uses Bomford Model (Bomford 2008) to formally assess exotic live species within a legislative process that requires assessment reports to be produced and stakeholders to be consulted.

The import of any live specimens – animals, plants and other organisms – also carries biosecurity risks, which are solely assessed and managed under the Biosecurity Act consistent with Australia’s appropriate level of protection (ALOP).

5.3 Environmental biosecurity import risk assessments

The Biosecurity Act mandates that environmental biosecurity risks be subject to formal regulated Biosecurity Import Risk Analysis or standard or non-regulated Import Risk Analysis (IGB 2025). Most risk assessments DAFF undertakes are standard/non-regulated and include scientific reviews of existing import requirements/conditions for goods or groups of goods, pest-specific risk assessments, weed risk assessments and scientific advice, among others. The risk assessment process potentially includes considering:

- the likelihood of pests and diseases being introduced into the country
- the environmental consequences if a pest or disease establishes itself
- the ability to control or eradicate the risk once it has been introduced.

This ensures that risk assessments are evidence based, transparent and aligned with Australia’s broader biosecurity objectives and its international rights and obligations under the WTO’s SPS Agreement and other international obligations. Risk assessments lead to the development of import requirements (or conditions) and biosecurity measures that must be met/applied pre-border (offshore) and at the border (onshore) to reduce the risk of entry and establishment of biosecurity risks associated with the movement of goods, people and conveyances to conform to Australia’s ALOP.

5.4 Environmental impact assessments

Sections 303ED and 303EE of the EPBC Act provide for assessments of environmental impacts that may result from importing live specimens. These assessments must be carried out before the Minister for the Environment and Water can update and amend the Live Import List that DCCEEW maintains. The Inspector-General notes that on DCCEEW’s [website](#) there are 2 flowcharts that provide a step-by-step process for amending the Live Import List to include a live specimen.

[Table 3](#) summarises the different provisions under the EPBC Act (and EPBC Regulations) and the Biosecurity Act for groups of live specimens and how DCCEEW and DAFF implement the relevant policy. DAFF undertakes biosecurity impact assessments (‘risk assessments’) in accordance with the Biosecurity Act. Again, there is no formal memorandum of understanding (MoU) between DAFF and DCCEEW, and this has led to ongoing challenges in their operational relationship and significant delays in the import risk review for psittacine birds from all countries (see [Box 2](#) and [Box 3](#)).

DAFF was unable to give the Inspector-General any information about the history of environmental risk assessments and whether these were subject to a previous agreement between the 2 agencies.

Table 3 Roles of DAFF and DCCEEW in biosecurity risk and environmental impact assessments

Attributes	Biosecurity Act 2015	EPBC Act 1999
Governance	<ul style="list-style-type: none"> Administered by DAFF. Responsible for conducting biosecurity risk assessments (or Import Risk Analyses). 	<ul style="list-style-type: none"> Administered by DCCEEW. Responsible for conducting environmental impact assessments (EIA).
Live animals	<ul style="list-style-type: none"> DAFF develops conditions and measures that minimise biosecurity risks associated with importation of live animals into Australia in accordance with Australia’s appropriate level of protection (ALOP). DAFF publishes import conditions on its publicly available BICON system. <p>DAFF conducts a single biosecurity risk assessment for all terrestrial, aquatic and avian animals.</p>	<ul style="list-style-type: none"> DCCEEW lists and publishes permitted live animals in the Live Import List. Live animals on Live Import List are permitted import into Australia under Part 13A of the EPBC Act. <p>DCCEEW conducts a single EIA for all live animal specimens under Part 13A of the EPBC Act.</p>
Live plants	<ul style="list-style-type: none"> DAFF develops conditions and measures that minimise biosecurity risks associated with importation of live plants into Australia in accordance with Australia’s ALOP. DAFF publishes import conditions on its publicly available BICON system. <p>Any live plants, including seeds, nursery stock and plants on the CITES list:</p> <ul style="list-style-type: none"> DAFF conducts biosecurity risk assessment, including weed risk assessment. <p>One assessment and process:</p> <ul style="list-style-type: none"> DAFF publishes assessment outcomes by amending biosecurity import conditions in the BICON system. 	<p>Live plants on the CITES list:</p> <ul style="list-style-type: none"> taken to be included in Part 2 if their import is not inconsistent with the Biosecurity Act. <p>All other live plants:</p> <ul style="list-style-type: none"> taken to be included in Part 1 if their import is not inconsistent with the Biosecurity Act. <p>Live plants:</p> <ul style="list-style-type: none"> DCCEEW does not conduct EIA for live plants. Plants on the CITES list require a permit under the EPBC Act.
Biological control agents	<p>For vertebrate animals:</p> <ul style="list-style-type: none"> DAFF develops conditions and measures that minimise biosecurity risks associated with importation of biological control agents into Australia in accordance with Australia’s ALOP. DAFF publishes import conditions on its website. <p>For invertebrate animals, fungi and microorganisms:</p> <ul style="list-style-type: none"> DAFF undertakes one biosecurity risk assessment and develops conditions and measures that minimise biosecurity risks associated with importation of biological control agents into Australia in accordance with Australia’s ALOP. DAFF publishes import conditions on its website. 	<p>Biocontrol animals (vertebrates):</p> <ul style="list-style-type: none"> DCCEEW uses DAFF’s biosecurity risk assessment of the biocontrol agent if consistent with the EPBC Act and regulations. <p>For biocontrol animals (invertebrates such as moths and wasps):</p> <ul style="list-style-type: none"> DCCEEW uses DAFF’s biosecurity risk assessment of the biocontrol agent if consistent with the EPBC Act and regulations. <p>After DAFF’s assessment, DCCEEW submits the findings to the Minister for the Environment and Water for a decision on including them in the Live Import List.</p>

Box 2 Case study: psittacine import risk analysis

In May 2016, DAFF (then the Department of Agriculture and Water Resources (DAWR)) commenced a risk review for import of psittacine birds from all countries. Before 1995, imports of psittacine birds had been permitted. However, in 1995 they were temporarily suspended because of concerns about proventricular dilatation disease (PDD). By 2016, scientific knowledge about PDD had improved to the point where a review of psittacine imports could be conducted.

In October 2017, DAFF contacted DCCEEW (then the Department of the Environment and Energy) and requested assistance and engagement with the import risk review. DCCEEW reports it was given information about the review, including the methodology, and circulated this to relevant internal stakeholders, such as relevant species recovery teams. Those internal stakeholders provided formal submissions to the review. DCCEEW did not comment on the disease chapters provided or the methodology given it holds no expertise in the assessment of disease.

In July 2020, DAFF released the [Import risk review for psittacine birds from all countries – draft report](#). It initiated a formal 60-day public consultation period and received over 100 written submissions. Between May and November 2021, there was extensive, repeated engagement between DAFF and DCCEEW officers (the 2 departments were merged as DAWE at that time) to answer DCCEEW questions about environmental risk posed by psittacine bird imports and explain the biosecurity risk assessment process. To resolve any residual concerns, all parties agreed that specific updates would be made to the draft report and publication of a final report would be delayed while an independent expert panel, the members of the Scientific Advisory Group, reviewed and commented on the draft report.

The panel sought clarification from DAFF on the scope of the panel's task, particularly the phrase 'relevant to effects on the environment'. DAFF informed the panel that this meant the direct and indirect impacts of diseases imported with psittacines on susceptible animal species, including native avian wildlife and potentially non-avian native species. This definition is consistent with obligations under the World Organisation for Animal Health rather than a more general definition of 'the environment' that includes physical parameters as well as all living organisms in that environment. The panel has therefore focused its comments on the biosecurity risks according to this definition of 'the environment'.

The expert panel considered the draft report and the 24 stakeholder submissions relevant to the biosecurity effects on the environment (as defined by DAFF); and consulted with departmental officers. The expert panel provided their report to DAFF in July 2021. The panel found that DAFF had:

- appropriately considered the stakeholder submissions on effects on the environment that had been received in response to the draft report
- included and properly considered scientific evidence concerning the environment, and the conclusions of the final report were scientifically reasonable and based on the material presented and available
- appropriately applied its methodologies for completing import risk analysis.

DAFF advised stakeholders that it had delayed publication of the final review report so it could seek and consider further input about the potential biosecurity risks relating to the environment, both direct (including the life and health of wildlife) and indirect (including biodiversity, endangered species and ecosystems). These factors had already been considered in the review; however, the expert panel was asked to provide further input to ensure DCCEEW concerns had been addressed.

At a webinar during the public consultation period, DAFF stated that the review was being conducted under the Biosecurity Act and, as such, was focused on disease risks. It said the invasiveness of psittacine species was assessed under the EPBC Act through the List of Specimens Taken to be Suitable for Live Import (Live Import List) process; therefore, any requests to include new species on the list would not be considered as part of the psittacine review.

At the time, the assessment under the live import process also sat with the then DAWE (under the Environmental Biosecurity Office). Over 30 species of psittacine birds remained on the list, along with the existing biosecurity import restrictions from DAFF. The Inspector-General notes that, under the Biosecurity Act, conditionally non-prohibited goods are only prohibited (that is, conditionally non-prohibited (CNP)) from being brought into Australia if certain conditions are not met under the Biosecurity (Conditionally Non-prohibited Goods) Determination 2021. CNP goods must either meet ‘alternative conditions’ or be covered by an import permit, which may include conditions following a risk assessment.

In 2023, the then Minister for the Environment indicated they would consider deleting all psittacine specimens that had not undergone an environmental risk assessment from the Live Import List and DCCEEW published an assessment notice to this effect. All species identified for potential removal are currently present in Australia. About half of these are native species and most are currently available for sale here.

The decision to remove most psittacine species from the Live Import List is a matter for the Minister for the Environment. DAFF provided DCCEEW with the final report on 14 July 2025. It is noted DAFF delayed publication of the final report from the psittacine import risk review so that an implementation plan could be developed and discussions between DAFF and DCCEEW could take place. DCCEEW and DAFF have been engaging at senior levels to avoid a situation where it could be perceived that one government department is working at cross-purposes to another department, noting both departments have separate, important and complementary regulatory responsibilities. Both departments remain committed to engaging further on this matter and can see value in further discussions on how the regulatory process can be improved for the betterment of proponents, the public and regulatory efficiency.

DCCEEW is assessing several psittacines for inclusion in the Live Import List. Currently, the DCCEEW website has an application to import *Electus polychloros* open for public comment. During 2023–24, it invited comments on applications to import *Electus roratus*, *Psittacula alexandri* and *Lorius chlorocercus*; see <https://www.dcceew.gov.au/environment/wildlife-trade/comment#draft-reports-for-amendments-to-the-live-import-list>.

In July 2024, an applicant from the Netherlands was advised that DCCEEW would only accept applications from New Zealand based applicants until the DAFF review had been completed. The applicant submitted an application to amend the Live Import List, but it is on hold.

In essence, the psittacine import risk review, initiated in 2016 and still unfinished in 2025, is plagued by severe delays and inefficiency. A critical flaw was the initial exclusion of environmental biosecurity risks (such as invasiveness and impact on wildlife) despite their obvious relevance. The lack of a formalised process to ensure a collaborative rather than siloed approach contributed to an inefficient assessment of the full spectrum of risks. As demonstrated by the advice given to the expert panel, the difference in definitions of ‘environment’ in the respective Acts may have also contributed to this issue (refer to [Box 1](#)).

Box 3 Case study: delays in the assessment of an import permit application for prawn-specific pathogen-free broodstock

In December 2024, an applicant (a private commercial company) contacted the Inspector-General about significant delay in decision-making by DAFF. In reviewing the evidence presented, the Inspector-General noted that, in 2018, the applicant had approached DCCEEW asking for the List of Specimens taken to be Suitable for Live Import (Live Import List) be amended to include specific pathogen-free (SPF) black tiger prawns *Penaeus monodon* (also known as the giant tiger prawn) for the purposes of prawn aquaculture development in Australia.

The applicant also applied to DAFF for an import permit. The applicant faced significant delays in decision-making due to procedural and bureaucratic challenges. DAFF required a decision by DCCEEW under the Live Import List process so that it could be considered as part of the Import Risk Assessment (IRA) process. As part of the process, DCCEEW sought advice from DAFF on a draft assessment. The current IRA practice, which results in processes occurring sequentially, often results in lengthy processes for applicants. *This lack of a documented regulatory framework and reliance on informal agreements further complicated the process.*

The application for live SPF *P. monodon* (broodstock) to be placed on the Live Import List remains unresolved due to delays between DAFF and DCCEEW processes. DAFF required DCCEEW's Live Import List process to conclude first. DCCEEW reports it sought advice and unfortunately DAFF advice was received several years later, in July 2024.

This example demonstrates a system that lacks a streamlined, documented regulatory process for undertaking complementary tasks; and relies on informal, undocumented agreements between the 2 departments, which undermines efficiency and accountability.

The environmental and biosecurity risk assessments for live imports follow separate but related processes under the EPBC Act and the Biosecurity Act. Most of the time, DAFF and DCCEEW risk assessment activities are largely independent of each other. They are undertaken under different legislation, using different methods, and have different focuses. When making a decision on an import permit under the Biosecurity Act, a specific set of considerations must be taken into account. This assessment process is different from the one concerning inclusion of a specimen on the Live Import List. While there may be some overlap, these processes are not currently coordinated or concurrent. This can lead to significant delays and inefficiencies.

In these cases ([Box 2](#) and [Box 3](#)), the reactive and fragmented processes have resulted in inter-agency misalignment and prolonged stakeholder uncertainty. They demonstrate the lack of a fully coordinated, whole-of-government biosecurity risk assessment covering biosecurity risk (as described by the Biosecurity Act) and impacts on the environment (as described by the EPBC Act). Because there is no formal agreed process to operate a coordinated process, there is an ongoing risk that similar issues may occur. These case studies highlight the need for a formal MoU to resolve the ongoing challenges in the operational relationship between DAFF and DCCEEW (Recommendation 1).

Recommendation 1

DAFF should maintain and clarify its leading role in comprehensive biosecurity risk analysis for all specimens of exotic species imported into Australia. To achieve this, led by the Australian Chief Environmental Biosecurity Officer, DAFF must proactively collaborate with the Department of Climate Change, Energy, the Environment and Water, providing necessary technical support (including from entities like the Australian Bureau of Agricultural and Resource Economics and Sciences). This collaboration should ensure that all potential biosecurity risks with environmental significance are comprehensively and satisfactorily addressed as part of a harmonised process involving both departments.

Department's response: The department accepts the recommendation.

The department will maintain and better clarify its lead role in delivering risk analysis processes in accordance with the *Biosecurity Act 2015*. The department's biosecurity risk policy is based on the assessment and management of pest and disease risk to human, animal and plant health and the environment. The department's risk analysis processes involve consultation and collaboration with stakeholders, and the department regularly reviews these to ensure roles and responsibilities are understood and processes remain transparent, effective and fit for purpose.

The department and the Department of Climate Change, Energy, the Environment and Water (DCCEEW) each have distinct roles in accordance with the *Biosecurity Act 2015*, and the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Acknowledging these respective differences, the department will continue to work collaboratively with DCCEEW to harmonise processes that support the assessment and management of environmental biosecurity risks where appropriate and practicable.

5.5 Is the legislative framework fit for purpose in achieving the intended outcomes for environmental biosecurity?

5.5.1 DAFF's role compared with DCCEEW's role

Under the Biosecurity Act, biosecurity import conditions apply to all conditionally non-prohibited goods that are prohibited from import (or being brought in) unless certain conditions are met under the Biosecurity (Conditionally Non-prohibited Goods) Determination 2021. Live plants and animals are included as conditionally non-prohibited goods. The conditions that may be applied include the requirement for a biosecurity risk assessment and an import permit under the Biosecurity Act and other measures that aim to reduce biosecurity risk consistent with Australia's ALOP. However, in practice, the potential of a plant proposed for import to become an invasive pest species (for example, a major weed) within Australia is assessed as a biosecurity risk and managed under the Biosecurity Act rather than the EPBC Act. On the other hand, the potential of an animal proposed for import to become an invasive pest species is considered and managed under the EPBC Act. Pests and diseases associated with that animal are assessed under the Biosecurity Act.

While the 2 Acts work together through the implementation by the portfolio agencies of DAFF and DCCEEW, there was no overt design to do so. It can be said that the 2 Acts work in tandem, providing a comprehensive biosecurity framework:

- The EPBC Act assesses the potential of a specimen to become an invasive species, focusing on its environmental impact.
- The Biosecurity Act complements this by managing the risks associated with pests and diseases linked to that specimen, including measures to prevent their entry and spread.

In areas of crossover between portfolios, the Acts have created both challenges and benefits.

The Inspector-General has identified several deficiencies in the current arrangements:

- *No formal joint decision-making framework:* The Acts do not mandate concurrent assessments or consultation, leading to sequential processes and delays.
- *Delayed priorities and decision-making:* Live Import List amendments (EPBC Act) and Import Risk Analyses (Biosecurity Act) often occur one after the other, causing lengthy approval timelines.

- *Inefficient risk assessment*: Environmental and biosecurity risks are assessed separately, with no unified guidelines, resulting in duplication and inconsistent standards.
- *Lack of ACEBO representation*: The ACEBO has no formal role in Import Risk Analyses, limiting environmental input in early stages.
- *Governance ambiguity*: Reliance on informal arrangements creates unclear roles and accountability gaps; and undermines transparency.

To address these issues, the Inspector-General emphasises that DAFF should work collaboratively with DCCEEW to:

- *Formalise joint decision-making frameworks*: The Biosecurity Act and the EPBC Act outline a practical division of responsibilities – such as invasive plants and animals (‘pests’) under the Biosecurity Act for pest and disease risks; and animals under the EPBC Act for invasiveness. However, there is no legislated mechanism for integrated decision-making. A formal, legislated framework is needed to support joint decisions and establish clear dispute resolution processes for cases where a proposed import raises significant concerns under both Acts. This would minimise gaps, reduce delays and prevent jurisdictional ambiguity.
- *Consolidate environmental biosecurity risk assessment guidelines*: Currently, DAFF conducts some risk assessments that DCCEEW uses to inform Live Import List amendments. However, there are no unified guidelines across both Acts. This creates inefficiencies and inconsistencies. A single set of environmental biosecurity risk assessment guidelines would ensure a holistic, transparent and efficient approach to evaluating all environmental threats posed by imports or pathways.

The Inspector-General notes that careful consideration of the Biosecurity Act and the EPBC Act would be required to determine whether it would be possible to align decision-making frameworks at the Act or legislation level. There is some overlap, but the objects of the Acts and legislative concepts set out under the Acts to achieve those objects are not entirely the same (Recommendation 2).

Recommendation 2

DAFF should work closely with DCCEEW to develop processes and policies in the implementation of decisions regarding environmental biosecurity to ensure that regulation under both Acts are fit for purpose and comprehensive.

Department’s response: The department accepts the recommendation.

The department will continue to implement legislation, develop and apply policies and processes that protect the environment from biosecurity threats posed by pests and diseases. In doing so, the department will work closely with DCCEEW to ensure a coordinated and consistent approach through each Act, where relevant to environmental biosecurity.

5.6 The case for a formal memorandum of understanding

Since the release of the 2017 independent review *Priorities for Australia’s biosecurity system* (Craik et al. 2017), there has been a clear and consistent call for DAFF to establish a formal MoU with DCCEEW because an MoU would clarify roles, responsibilities and processes for managing environmental biosecurity risks.

This recommendation has been on record for several years. However, progress has been limited. DAFF has not provided evidence of any substantive steps toward developing or finalising an MoU. Machinery of government changes may be the cause of these delays, but it is reasonable to assume that an MoU would be needed and should have been made a priority.

The lack of a formal arrangement results in governance gaps, delays in decision-making and inefficiencies in managing shared responsibilities under the Biosecurity Act and the EPBC Act.

5.6.1 Craik et al., 2017

The panel of the 2017 independent review *Priorities for Australia's biosecurity system* (Craik et al. 2017) recommended:

... that 'lead' biosecurity agencies (agriculture) should have formalised arrangements with their 'support' biosecurity agencies (environment, national parks, fisheries, regional development, defence et cetera).

For the Australian Government, MoUs have been signed between the then departments of agriculture and health, and between the then department of agriculture and the Customs and Border Protection Service. However, no such MoU exists between the Australian Government agencies responsible for agriculture and the environment.

The review emphasised the need to institute formal arrangements between agriculture and environment agencies:

An MoU between the agriculture and environment agencies should capture how biosecurity risks will be addressed through live import controls and threat abatement and recovery planning processes under the EPBC Act. It should also capture, where these overlap with the NEBRA or another response deed, how responsibilities are assigned (Craik et al. 2017).

5.6.2 Inspector-General of Biosecurity, 2019

The former Inspector-General of Biosecurity also reviewed Australia's environmental biosecurity arrangements and noted:

The Senate inquiry, the IGAB and the NEBRA reviews all recognised that environmental biosecurity is as important as human health and agricultural biosecurity. Agriculture's CEBO is developing an MoU with Environment (now DCCEEW) about environmental biosecurity. This MoU should outline processes for the two departments to jointly agree on desired environmental biosecurity outcomes at the Australian Government level and report regularly on their performance effectiveness (IGB 2019a).

The former Inspector-General explicitly recommended:

[Recommendation 1] The department [DAFF] should include, in its forthcoming Memorandum of Understanding with the Department of the Environment and Energy [now DCCEEW], roles and processes for the two departments, to agree on desired environmental biosecurity outcomes at the Australian Government level, including performance reporting over time (IGB 2019a).

5.6.3 Senate estimates, 2023

The Inspector-General notes that in June 2023, at a hearing of the Senate Rural and Regional Affairs and Transport Legislation Committee, Senator Whish-Wilson explicitly asked DAFF about its plans to develop a biosecurity MoU between DAFF and DCCEEW. The senator asked:

1. What plans are there to develop a biosecurity MoU between Australia's agriculture and environment departments?
2. If there is a draft in development, please provide a summary or copy of the agreement.
3. Has the IDC between Australia's environment and agriculture departments resulted in any written agreement about any of these issues that were recommended for the MoU?
4. Is there a ToR or written outcomes from the IDC on these topics? If yes, please provide a copy.

DAFF's response to these questions confirmed that there is no formal biosecurity-related agreement between the 2 departments. The response also noted that the machinery of government changes in 2022 led to the separation of environment and agriculture portfolios and that both departments are represented on several interjurisdictional committees, including the Environment and Invasives Committee that sits under the National Biosecurity Committee.

5.7 Risks arising from lack of an MoU

The Inspector-General acknowledges that DAFF and DCCEEW have maintained a cooperative working relationship. However, the absence of a formal MoU introduces significant governance and operational risks. The use of informal arrangements leads to a lack the clarity and accountability needed for effective coordination, particularly when managing complex biosecurity and environmental risks. Without a structured framework, both departments face challenges in aligning responsibilities, streamlining processes and ensuring timely responses to emerging threats. The key risks associated with this gap are as follows:

- *Lack of coordination:* Without a clear framework for cooperation, there may be gaps in coordination between the 2 departments, leading to inefficiencies or overlapping efforts in managing biosecurity threats.
- *Unclear roles and responsibilities:* Ambiguity in the roles of each department could result in miscommunication or delayed response(s) to biosecurity incident(s), which could exacerbate the spread of exotic pests and diseases.
- *Ineffective risk management:* A lack of formal agreement could hinder the development of comprehensive risk management strategies, leaving Australia vulnerable to biosecurity threats that affect agriculture, environment and the economy.
- *Fragmented response to emerging threats:* Biosecurity threats, such as new invasive species or diseases, require rapid, coordinated responses. Without a formal MoU, the lack of a unified approach could slow down the response time and reduce effectiveness.

To address issues such as poor coordination and delays in decision-making ([Box 2](#) and [Box 3](#)), an MoU between DAFF and DCCEEW would deliver a synergistic and mutually beneficial partnership (Recommendation 3).

Recommendation 3

DAFF should, as a priority, take a lead in developing a memorandum of understanding (MoU) with the Department of Climate Change, Energy, the Environment and Water. The MoU should set out the representation, working relationship, expectations, roles, responsibilities and duties of both departments at strategic, policy and operational levels including in relation to import risk analyses, emergency response to pests and diseases of environmental biosecurity concern, and live animal import policy.

Department's response: The department accepts in principle the recommendation.

The department considers coordinated effort, shared learnings and strategic action for environmental biosecurity is not prohibited in the absence of a MoU with DCCEEW. The Environmental Biosecurity Interdepartmental Group (EBIG) is the formal mechanism for both departments to engage regularly on environmental biosecurity matters. An MoU between agencies is a governance mechanism, that would likely be broader in scope for both departments than environmental biosecurity. The department will, in consultation with DCCEEW, assess the additional benefits of developing a MoU to formally document roles, responsibilities and ways of working between departments. However, we will also ensure that current governance is fit for purpose.

6 Policy, governance and other organisational arrangements

6.1 The Australian Chief Environmental Biosecurity Officer

The Australian Chief Environmental Biosecurity Officer (ACEBO) within DAFF plays a crucial leadership role in environmental biosecurity by providing strategic direction to address environmental biosecurity challenges when required.

The ACEBO's appointment to the role was in response to the Intergovernmental Agreement on Biosecurity (IGAB) review (Craik et al. 2017), which recommended:

The Australian Government should establish the senior, expert position of Chief Community and Environmental Biosecurity Officer within the environment department. A far less preferred alternative is to house the position in the agriculture department.

However, the Environmental Biosecurity Office (EBO) was established within the then Department of Agriculture (now DAFF), with an inaugural Chief Environmental Biosecurity Officer appointed in late 2018. This position was established to address the identified need for clearer leadership and coordination in managing environmental biosecurity within Australia.

The ACEBO remains the primary representative and advisor to the Australian Government on matters relevant to Australia's environmental biosecurity.

6.1.1 Roles and responsibilities

The ACEBO:

- provides national leadership in coordinating environmental biosecurity efforts, addressing systemic gaps and strengthening collaboration to prevent and manage biosecurity risks to the environment, First Nations values, culture and social amenity. The office collaborates with all levels of government, industry, non-government organisations, natural resource management bodies, the research sector, individuals and the broader community to achieve these goals
- ensures environmental considerations are integrated into the broader biosecurity framework. The role involves leadership in the prevention, detection and management of exotic and established pests, diseases and weeds; and response and recovery in coordination with key stakeholders, such as the Threatened Species Commissioner within DCCEEW.

The ACEBO's key responsibilities include:

- enhancing research, development and extension capacity for environmental biosecurity
- leading communication and engagement initiatives for environmental biosecurity to foster awareness and support from communities and environmental groups
- supporting Australia's commitments under the Convention on Biological Diversity, to manage invasive species and mitigate their impacts on biodiversity
- coordinating with state and territory governments, industries, non-government organisations and community organisations to protect natural environments, cultural heritage and social amenities from biosecurity threats
- working closely with the Environment and Invasives Committee to maintain and implement the National Priority List for Exotic Environmental Pests, Weeds and Diseases
- supporting projects to enhance environmental biosecurity preparedness, surveillance and response capacity
- under the National Environmental Biosecurity Response Agreement, through the Consultative Committee, coordinating national responses with states and territories.

Additionally, the EBO:

- is represented on various departmental committees and groups to facilitate integration of environmental biosecurity across DAFF
- serves as the national notification point for environmental pest, weed and disease detections, playing a critical role in response management.

Since the EBO was established in 2018, it has provided leadership and strategic direction in addressing complex environmental biosecurity challenges. However, as highlighted in the Inspector-General's recent review (IGB 2025), the ACEBO is not formally consulted regularly in key decision-making committees – for example, the Market Access Risk Analysis Board and Scientific Advisory Group, which oversee the prioritisation of import risk analyses and assessments of goods and live specimens, amongst other things. DAFF should ensure that risk analyses clearly include exotic species from an environmental perspective – a role that the ACEBO should ideally contribute to more directly. If DAFF does not have the capability to conduct environmental assessments as part of the process of considering all risks, this capability should be sourced from DCCEEW or external providers.

6.2 Challenges facing the Australian Chief Environmental Biosecurity Officer

The role of the ACEBO within DAFF is uniquely complex, yet it consistently faces issues with clarity, authority and adequate resourcing. The Inspector-General has identified the following areas of concern, which DAFF must address for intended environmental biosecurity outcomes.

6.2.1 Unclear mandate and authority

A fundamental challenge is the unclear nature of the ACEBO's role and its effectiveness. This has been the result of the role's reclassification to a lower level and of broader departmental issues where boundaries of responsibility and authority are not well defined, as pointed out in the IGB's 2021 report *Adequacy of department's operational model to effectively mitigate biosecurity risks in evolving risk and business environments*.

There is a stakeholder perception that the downgrading of the ACEBO position signals a departmental culture where environmental biosecurity is less important than agricultural biosecurity. It also means the ACEBO is not a member of the Biosecurity Group's highest management cohort.

The ACEBO needs clear authority to ensure any possible impacts on the environment, as defined by the Biosecurity Act, are thoroughly considered in Import Risk Analyses. Without a defined, actionable strategic plan for environmental biosecurity, including specific outputs and outcomes, it is difficult to measure success or progress. This highlights the critical need for improved governance and strategic planning.

6.2.2 Impact of structural instability

The EBO and the ACEBO have been significantly hampered by frequent changes in government structures, departments and staff reallocations. The separation of agriculture and environmental portfolios and the downgrading of the ACEBO's role have potentially impaired the effectiveness of environmental biosecurity operations. While restructuring efforts, such as creating specialised teams and merging offices, may improve future coordination, the ongoing instability from machinery of government changes hinders the ACEBO's capacity to perform its responsibilities consistently and efficiently (Recommendation 6).

To enhance the ACEBO's effectiveness, the Inspector-General suggests:

- formalising and clarifying the shared legislative framework between DAFF and DCCEEW to eliminate duplication, clearly defining responsibilities and closing potential gaps in risk assessment and decision-making for environmental biosecurity
- clearly defining the ACEBO's role and responsibilities, ensuring it is consistent with other Chief Officer positions (Australian Chief Veterinary Officer and Australian Chief Plant Protection Officer) and focuses on DAFF's responsibilities under the Biosecurity Act
- formalising and increasing consistent funding for environmental biosecurity, moving away from discretionary allocations

- developing a clear, actionable plan for environmental biosecurity within the ACEBO office, complete with specific outputs and outcomes to measure progress
- fostering a cultural shift within DAFF that recognises environmental biosecurity as a critical, core function rather than a peripheral concern
- addressing the issue of internal resourcing for environmental expertise, ensuring DAFF has the capacity to support these contributions adequately.

6.3 Development and implementation of strategies and policies

6.3.1 Environmental Biosecurity Framework

The Environmental Biosecurity Framework is a comprehensive plan to enhance Australia’s ability to manage and respond to environmental biosecurity risks. The framework emphasises the critical role of biosecurity in protecting Australia’s unique environment, economy and way of life. Its goal is to create a trusted and robust system that addresses exotic and emerging pests, weeds and diseases threatening the natural environment and social amenity.

The framework was created by the Environment and Invasives Committee (EIC) through a collaborative effort, led by the ACEBO, involving a small working group. It was endorsed by the EIC and released in March 2022 as [A Framework for Transforming and Strengthening Australia’s Environmental Biosecurity System](#). The document outlines a comprehensive framework aimed at transforming and strengthening the whole of Australia’s environmental biosecurity system.

One of the key strategies of the framework is to improve research, intelligence and risk assessment to understand and prioritise threats. It also focuses on minimising the spread and impact of exotic pests, weeds and diseases through revised plans and national preparedness, intercepting threats at the border and preventing the arrival of new pests. The framework highlights the importance of involving the community, including First Nations groups, in biosecurity actions.

The framework calls for the development of a national environmental biosecurity strategy to guide coordinated action and partnerships. It also proposes a periodic environmental biosecurity status report to monitor emerging threats and prioritise responses. The framework aims to enhance surveillance, preparedness and response capabilities, ensuring a resilient biosecurity system that protects Australia’s environmental, social and cultural assets.

6.3.2 National environmental biosecurity strategy

Currently, there is no environmental biosecurity strategy in place. However, as highlighted in the Environmental Biosecurity Framework, the environmental biosecurity strategy is to be developed, guided by the framework. The strategy will build on the existing plans and strategies for invasive species, plant biosecurity and animal biosecurity.

An important aspect of the strategy is that it will align with the key principles of the Environmental Biosecurity Framework in fostering strong collaboration and partnerships among government, industry, community groups and individuals. This collaborative approach will be used to identify key actions and determine where enhanced cooperation, resource-sharing and investment are needed. Resources may come from government bodies, philanthropic contributions or volunteer efforts.

The strategy should consider incorporating insights and contributions from First Nations Peoples, relevant committees and key stakeholders to ensure it reflects diverse perspectives and needs. Whether it stands alone or integrates with broader national biosecurity efforts, the strategy will be a collective blueprint for safeguarding Australia’s environmental assets (Recommendation 4).

Recommendation 4

DAFF, in consultation with DCCEEW and key stakeholders, must urgently develop and sustainably resource a comprehensive Environmental Biosecurity Strategy, ensuring it is a collaborative blueprint that deeply integrates environmental expertise (internal and external) to protect Australia's natural assets.

Department's response: The department accepts in principle the recommendation.

There are existing individual and overarching strategies that address environmental biosecurity such as the National Biosecurity Strategy 2022–2032 (NBS), which the department plays a key role in delivering, and which already provide a mechanism to deliver on the intent of this recommendation. In consultation with DCCEEW and key stakeholders, the department will consider the need for a collaborative and integrative strategic blueprint specifically for environmental biosecurity outcomes (for example, a Strategic Partnership Statement for both agencies). This will better clarify the Commonwealth's environment biosecurity priorities but linked to existing national strategies. The department considers that this will be a more fit for purpose approach than creating a new strategy and will avoid duplication.

6.3.3 Environmental biosecurity status report

As trade volumes grow and climate variability increases, Australia needs to work smarter and more effectively to address new and emerging threats to important environmental and cultural assets. A periodic status report, as proposed by the Environmental Biosecurity Framework, will help maintain a shared understanding of the current state of environmental biosecurity, guiding coordinated action and prioritisation. It is proposed that this report would include:

- up-to-date information on priority risk and consequence assessments
- the implementation status of recommendations from key reviews and strategies or implementation progress against targets (such as the 2017 system review report, health of the biosecurity system, [Convention on Biological Diversity Kunming–Montreal Global Biodiversity Framework targets](#))
- major projects underway and planned
- a governance map
- key collaborators
- web resources
- collated data on introductions, interceptions, detections, establishments and responses (Recommendation 5).

Recommendation 5

As prescribed in the Environmental Biosecurity Framework, the Environmental Biosecurity Office should regularly produce an environmental biosecurity status report. The status report is crucial to maintain a shared understanding of the current state of environmental biosecurity; guide coordinated action and prioritise efforts against new and emerging threats.

Department's response: The department notes the recommendation.

The department is committed to environmental biosecurity reporting that supports a shared understanding, coordinated action and prioritises emerging threats. The department proposes to include a dedicated Environmental Biosecurity Status Report into planned NBS reporting (with the first NBS Action Plan annual report proposed for early 2026). This will include information on environmental biosecurity risks and actions. This approach will still provide transparency but will be more effective and efficient.

6.3.4 Accomplishments within the Environmental Biosecurity Framework

The Environmental Biosecurity Framework has been actively enhancing the inclusiveness and consideration of environmental biosecurity within existing documents to elevate relevant activities and actions. The EBO is currently involved in or has undertaken the following actions to support the Environmental Biosecurity Framework:

- *Global Register of International Invasive Species*: The EBO has completed an inventory of invasive species across Australia, including locations, history, and status.
- *Atlas of Living Australia*: The EBO supported the development of species distribution information and methods to enhance data quality.
- *Risk assessments*: The EBO conducted several assessments focusing on Exotic Environmental Pest List (EEPL) species.
- *Incursion reporting system*: The EBO developed an invasive species reporting and biosecurity alert system in collaboration with CSIRO, delivering reports of exotic incursions to states and territories.
- *eDNA capability*: The EBO has collaborated with DAFF groups to include EEPL species in the eDNA capability development program.
- *Wildlife smuggling detection*: The EBO has assisted in creating algorithms for identifying smuggled wildlife imports and exports using 3D X-ray technology.
- *Artificial intelligence-backed technology for ant identification*: The EBO has implemented artificial intelligence to identify exotic invasive ants via a mobile app.
- *National surveillance capability*: The EBO has led the development of a general surveillance program utilising citizen science. The iNaturalist app can be used to report exotic invasive species, with data recorded in [Atlas of Living Australia](#).

6.3.5 Environmental Biosecurity Interdepartmental Group

The [Environmental Biosecurity Interdepartmental Group](#) (EBIG) has been established to ensure a whole-of-government approach on environmental biosecurity matters and to better understand and identify opportunities to work together to support ongoing collaboration between DAFF and DCCEEW.

EBIG members are representatives from both DAFF and DCCEEW who have policy and program responsibility for matters relating to environmental biosecurity. Core membership consists of Senior Executive Service (SES) representatives or equivalent from:

- Plant Protection and Environmental Biosecurity Division's Environmental Biosecurity Office (DAFF)
- Biodiversity Division (DCCEEW), including the Threatened Species Commissioner Branch
- International Environment, Reef and Oceans Division (DCCEEW), including the Oceans and Wildlife Branch.

EBIG members are responsible for briefing upwards on meeting discussions and outcomes to their respective executive.

The Inspector-General recommends that, given the issues arising from the lack of a formal MoU between DAFF and DCCEEW, the EBIG be actively leveraged and empowered to resolve these interdepartmental issues and streamline the working relationship between the 2 departments.

The EBIG, with its established purpose to 'ensure a whole-of-government approach on environmental biosecurity matters, and to better understand and identify opportunities to work together to support ongoing collaboration between DAFF and DCCEEW', is already ideally positioned to coordinate the operation of an MoU (see Recommendation 3). By utilising the existing structure and senior representation from both departments within the EBIG, a more efficient and effective mechanism can be created to address current challenges and enhance collaboration.

6.3.6 Stakeholder collaboration and communication

The ACEBO plays a crucial role in communicating environmental biosecurity priorities to governments, industry and the broader community through multiple channels, including LinkedIn, the *Three Chiefs Newsletter*, email updates, DAFF's website, webinars, roundtables, presentations at national events and media releases. Some of DAFF's notable stakeholder communication activities are as follows:

- Between 2016 and 2020, DAFF hosted bi-annual Environmental Biosecurity Roundtables, fostering collaboration and knowledge sharing among government, industry and research stakeholders. The initiative paused in 2021 due to COVID-19, with current focus shifting to issue-specific webinars, such as those on the National Carp Control Plan, fire ant eradication and High Pathogenicity Avian Influenza (HPAI) preparedness and delivered 31 webinars between 2020 and 2024.
- DAFF sponsored and presented at major biosecurity conferences, including the Australasian Vertebrate Pest and Weeds Conferences and the Australian Biosecurity Symposium, showcasing DAFF's initiatives and fostering collaboration on environmental biosecurity.
- The *Three Chiefs Newsletter* provides leadership updates on significant projects and policies, featuring contributions from the ACEBO. The film *Roots of Resilience* raises awareness about environmental biosecurity threats like Bunya pine dieback and myrtle rust, highlighting forest health and First Nations' deep connections and concerns.
- In 2024, DAFF led the conduct of the Exercise Volare to assess the nation's readiness for a potential outbreak of HPAI amid the global spread of the H5N1 strain. The exercise aimed to enhance awareness of HPAI risks, evaluate Australia's coordinated government response mechanisms, refine public communication strategies and test technical capabilities for H5N1 detection. It was managed by the HPAI Preparedness Taskforce with the ACEBO's support.
- DAFF recently initiated a refresh of its environmental biosecurity webpages to improve user experience and ensure consistent, up-to-date messaging across the website.

6.4 Funding administered by the Environmental Biosecurity Office

Environmental biosecurity outcomes are integrated within the broader national biosecurity system, contributing to the protection of Australia's environment. While it can be challenging to pinpoint the exact investment allocated to specific environmental pest species, many funded projects support overarching environmental biosecurity efforts, benefiting multiple species and ecosystems. The EBO administers several programs aimed at advancing these environmental biosecurity outcomes

6.4.1 EEPL preparedness activities funding

Environmental biosecurity preparedness activities are carried out across various areas within DAFF as part of its core responsibilities. These prevention and preparedness efforts, alongside research and development, focus on identifying and mitigating risks, managing pathways, developing control tools and enhancing detection and surveillance capabilities both pre-border and at the border. These activities aim to strengthen the entire system's capacity to manage multiple pest species effectively.

Appendix B provides details on DAFF's funding allocations for the high-risk exotic environmental pests, weeds and diseases identified by the EEPL, as well as the status of preparedness plans. To date, DAFF has developed 20 preparedness plans for high-risk (priority) environmental pests and allocated \$3.95 million over the past 5 years.

6.4.2 Environmental Biosecurity Project Fund

Launched in 2018, the Environmental Biosecurity Project Fund (EBPF) provides financial support for projects specifically aimed at protecting Australia's environment from biosecurity risks, such as invasive species and diseases that threaten native ecosystems, agriculture and biodiversity.

The fund has an annual allocation of \$825,000 and is administered by the EBO located within DAFF. An overview of the EBPF is provided in [Box 4](#).

Box 4 Overview of the Environmental Biosecurity Project Fund

Purpose

The Environmental Biosecurity Project Fund (EBPF) is designed to support projects that prevent, manage or mitigate threats posed by exotic environmental pests, weeds and diseases that are not present in Australia, or are under official eradication, and could harm Australia's natural environment.

Scope

The scope of the EBPF is to support projects that help improve our:

- ability to prevent, detect and respond to exotic environmental pests, weeds and diseases entering Australia
- understanding and management of the risks of EEPL species.

Objectives

- To be eligible for funding, EBPF projects must address one or more of the following objectives:
- Improve capacity for biosecurity preparedness and response.
- Enhance surveillance, detection and diagnostic capabilities for environmental biosecurity threats.
- Foster expertise, networks and collaboration to enable coordinated and effective responses to environmental biosecurity threats.
- Raise awareness and understanding of environmental biosecurity.

Eligibility

Government agencies, research organisations and community groups may be eligible to apply for funding. Projects may be led by national, state, or local organisations that have the expertise and capacity to address biosecurity risks.

Collaboration

The EBPF encourages collaboration among stakeholders, including federal and state governments, researchers, conservation organisations and industry groups, to develop effective strategies for managing environmental biosecurity risks.

Alignment with the National Biosecurity Strategy

The EBPF aligns with broader national and international biosecurity efforts, contributing to Australia's National Biosecurity Strategy and ensuring that Australia meets its obligations under global conventions and agreements on biodiversity protection.

The project fund is not a grant program and operates without public funding rounds. The ACEBO identifies priorities, determines required goods and services and selects procurement processes to engage providers. All procurements are reported on AusTender and unspent funds roll over to the ensuing year with Treasury's approval.

To date, the EBO has funded 49 projects through the EBPF, under various categories, to support projects and build capabilities that improve our ability to prevent, detect and respond to exotic environmental pests, weeds and diseases entering Australia.

6.5 Evolution of Environmental Biosecurity Office and ACEBO's role

Since the establishment of the ACEBO's position in 2018, the role has undergone several changes ([Table 4](#)).

Table 4 Evolution of the Environmental Biosecurity Office and the Australian Chief Environmental Biosecurity Officer's role

Dates	Name	Machinery of Government changes	Changes to the EBO
1 July 2022 to present	Department of Agriculture, Fisheries and Forestry (DAFF)	<ul style="list-style-type: none"> The department renamed to DAFF. Environment and water-related functions moved to the newly established Department of Climate Change, Energy, the Environment and Water (DCCEEW). 	<ul style="list-style-type: none"> The third Australian Chief Environmental Biosecurity Officer (ACEBO) took office in January 2023. DAFF's January 2023 organisational review led to the merger of the Environmental Biosecurity Office with the Australian Chief Plant Protection Office. This resulted in the first formal classification of the ACEBO's position and reporting line. Machinery of government changes led to the transfer of Listings and Threat Abatement Planning section, with 18 staff, back to DCCEEW. In August 2023, DAFF implemented a new structure for the ACEBO's office, comprising 3 teams: <ul style="list-style-type: none"> Programmes and National Coordination Policy and Strategy Research Innovation and Data. As of March 2025, these teams had a total of 25.8 full-time equivalent staff (excludes the Australian Plague Locust Commission). The ACEBO is also one of the 6 Australian Plague Locust Commissioners overseeing the operations of the Australian Plague Locust Commission.
1 February 2020 to 30 June 2022	Department of Agriculture, Water and the Environment (DAWE)	DAWE formed by merging the former Department of Agriculture with the environment functions of the Department of the Environment and Energy (DoEE), bringing together biosecurity and environmental responsibilities.	<ul style="list-style-type: none"> The second ACEBO was appointed in March 2021. The Established Pest Animals and Weeds section, along with the National Carp Biological Control Plan, comprising 22 staff across 3 sections, was transferred.

30 May 2019 to 31 January 2020	Department of Agriculture (DoA)	The department renamed to the Department of Agriculture.	Development of the ACEBO role.
21 September 2015 to 29 May 2019	Department of Agriculture and Water Resources (DAWR)	The department renamed to reflect its expanded responsibilities, including both agriculture and water portfolios. Biosecurity was also within its remit.	<ul style="list-style-type: none"> The Environmental Biosecurity Office was established in late 2018. The first ACEBO was appointed at the First Assistant Secretary (SES Band 2) level in December 2018. The Listings and Threat Abatement Planning section, which previously existed in the former Environment Department, with 5 staff.
18 September 2013 to 20 September 2015	Department of Agriculture, Fisheries and Forestry (DAFF)	The department was formed through an administrative order issued on 18 September 2013, consolidating functions from the preceding departments.	The 2017 Craik Review (Craik et al. 2017) recommended the establishment of the expert position of Chief Community and Environmental Biosecurity Officer within the environment department.

[Table 4](#) highlights the evolution of the EBO and the ACEBO role since its establishment. The position was not well defined when formed. This lack of direction, the disruption caused by machinery of government changes and the change in reporting arrangements led to challenges for each of the ACEBOs. Each operated the role as best they could under the circumstances, but the lack of real strategic direction is evident in its implementation. Key changes and their implications on the EBO and ACEBO's role are discussed below.

6.5.1 Downgrading of ACEBO's role and reporting line

A significant concern is the downgrading of the ACEBO role in 2022. The inaugural ACEBO was appointed at the First Assistant Secretary (SES Band 2) level, reflecting the strategic importance of environmental biosecurity within the national biosecurity framework.

However, by 2023, the role was reclassified to Assistant Secretary (SES Band 1), reducing its seniority. This change was reportedly made to align the position with the Threatened Species Commissioner at DCCEEW and followed an Australian Public Service Commission review of position classifications.

Stakeholders have expressed concern that this reclassification signals a diminished emphasis on environmental biosecurity compared to trade-focused biosecurity priorities. Given the breadth and complexity of ACEBO's responsibilities, this downgrade likely weakened the role's influence and decision-making authority within the broader biosecurity and environmental policy landscape.

6.5.2 Relationship with other divisions

While each division holds a specialised leadership role for critical components of Australia's biosecurity, their relationship is built on collaboration, shared objectives for national protection, and a recognition that biosecurity threats often transcend traditional boundaries between animal, plant and environmental health. They must work as a cohesive team to provide strategic direction and expert advice on biosecurity matters. There are (and have been) good working relationships amongst the staff from the different offices and this supports successful collaboration. A good example of this is the collaboration within DAFF for addressing the risks of HPAI.

However, there is sufficient circumstantial evidence that supports reduced decision-making confidence, increased risk aversion, silo behaviour, and ambiguity between technical and operational areas of DAFF had reduced the efficiency and effectiveness of Australia's primary biosecurity agency. Demonstrably, several previous Inspector-General reviews published in the past decade support this assertion (IGB 2017, IGB 2019a, IGB 2019b, IGB 2019c, IGB 2020a, IGB 2020b and IGB 2021a).

The former Inspector-General in his review (IGB 2021b) explicitly noted how siloed behaviours obscure the accountability between the biosecurity divisions and relevant senior executives:

The 'risk owner' model appears to make it harder to prioritise biosecurity risks, as it silos risk prioritisation from the perspective of the risk owner. In fact, at an operational level, the system operates by managing the large number of biosecurity risks using a small number of concurrent and overlapping pathway controls. The result is that the accountability between the biosecurity divisions and relevant senior executives is obscured. This is usually the result of risk owners competing against other risk owners/senior executive for operational resource related to the management of their risks.

6.5.3 Creation of specialised teams within the ACEBO's office

In August 2023, a more defined organisational structure was established within ACEBO's office, with 3 distinct teams focused on Programmes and National Coordination, Policy and Strategy and Research Innovation and Data. This restructuring could improve operational focus and ensure clearer responsibilities across the office. However, frequent changes in organisational structure may have initially hindered the DAFF's ability to develop robust systems and processes for addressing biosecurity issues, as staff needed to adapt to new team structures and reporting lines.

6.6 Impacts of machinery of government changes

Over the years, the EBO has undergone multiple restructures and relocations due to changes in government. Initially, the EBO was part of the Department of Agriculture, Fisheries and Forestry (DAFF), before a machinery of government change established the Department of Agriculture and Water Resources (DAWR), then Department of Agriculture, Water and the Environment (DAWE), and later back to DAFF, with environment functions moving to the Department of Climate Change, Energy, the Environment and Water (DCCEEW). Each time the 'environment' portfolio was separated from 'agriculture', it disrupted the continuity of the environmental biosecurity system, often leading to misalignment in priorities and inefficient coordination.

Machinery of government changes, which involve shifts in the responsibilities and structures of government departments and agencies, can potentially disrupt the delivery of biosecurity outcomes. These disruptions can be wide-ranging and occur when roles, responsibilities and functions are reassigned between departments and impact delivery of intended activities due to:

- changes to organisational structures
- transfers of employees
- transfers of assets and liabilities
- changes to information systems
- changes to corporate policies, procedures and plans.

Potential disruptions due to machinery of government changes between DAFF and DCCEEW are discussed below.

6.6.1 Coordination challenges

Effective management of biosecurity risks often requires close coordination between departments. If DAFF (which has traditionally managed agricultural biosecurity) and DCCEEW (which deals with environmental protections, including biosecurity issues like invasive species) are split or have shifting responsibilities, it can lead to inefficiencies or slower decision-making (Recommendation 6).

6.6.2 Loss of expertise and institutional knowledge

Machinery of government changes can disrupt institutional knowledge. If biosecurity responsibilities are reassigned, departments may lose expertise in areas they have traditionally handled. This can create a gap in knowledge, relationships with stakeholders, or the ability to act quickly when biosecurity threats arise.

One of the key challenges for DAFF is the need for more ecological expertise within the Environmental Biosecurity Group. While there is some expertise, it is not sufficient. A potential solution is to hire more staff with ecological backgrounds, but this is difficult given current government operations, funding constraints and related challenges. The other solution to that is to outsource some of that work to an external organisation or a consultant (subject matter expert).

6.6.3 Inefficient resource allocation

When departmental responsibilities change, there may be mismatches between available resources and biosecurity needs in both the agricultural and environmental sectors. If resources are not effectively reallocated or if both departments face budget constraints, biosecurity initiatives may not receive the funding or support they need to be effective.

6.6.4 Lack of clear policy and strategic direction

Changes in DAFF's organisational structures may result in a lack of clear direction on how biosecurity policy should be implemented. Biosecurity requires consistent, long-term strategy and any disruption in leadership or policy direction can hinder the development and implementation of coherent policies to address risks across sectors. There is an absence of a measurable and actionable plan for environmental biosecurity. Fundamental governance principles dictate that any activity should have a clear longer term plan outlining objectives, methods, evaluation metrics and strategies for improvement. This kind of structured approach is missing in the environmental biosecurity space. The routine business planning processes do not appear to sufficiently address the longer term needs.

6.6.5 Impacts on stakeholder engagement

Stakeholders rely on clear, consistent communication from government departments. Changes in the structure or functions of these departments can disrupt the relationships built with stakeholders, leading to confusion, frustration and potentially a loss of trust in the government's ability to manage biosecurity risks.

6.6.6 Changes of staff and structure

As DAFF's organisational structure changed, the staffing levels and organisational focus also shifted. Notably, the number of staff in ACEBO-related areas fluctuated:

- In 2023, after the merger of the ACEBO and the Australian Chief Plant Protection Office, the number of staff within the newly restructured teams increased to 29, showing some consolidation of efforts.
- Before this, there were periods of downsizing, particularly when sections were moved between departments (for example, the Listings and Threat Abatement Planning section, with 18 staff, transferred to DCCEEW in 2023). These types of changes impacted the office's ability to deliver on biosecurity responsibilities effectively.

Changes like the creation of new sections (such as the Established Pest Animals and Weeds section in 2021) and the transfer of staff between departments can lead to confusion, gaps in communication and inefficiencies in biosecurity delivery. The 18 staff transferred to DCCEEW and the division of roles across 2 departments risked fragmentation of efforts to tackle biosecurity threats comprehensively (Recommendation 6).

Recommendation 6

The Australian Government should stabilise the Environmental Biosecurity Office at a level consistent with that of the Australian Chief Veterinary Officer and Australian Chief Plant Protection Officer roles and strengthen the role of the Australian Chief Environmental Biosecurity Officer to improve overall coordination in environmental biosecurity efforts. Ensuring stability and providing the necessary leadership, resources and cross-departmental integration will enable the government to better protect agriculture and the environment from emerging biosecurity threats.

Department's response: The department accepts in principle the recommendation.

The department is in the process of reclassifying the Australian Chief Environmental Biosecurity Officer (ACEBO) role to a Senior Executive Service (SES) Band 2, consistent with the current Australian Chief Veterinary Officer and Australian Chief Plant Protection Officer positions. The classification of an individual role is determined by the requirements of the position and assessed against the Australian Public Service (APS) Work Level Standards. We are progressing an assessment. If this assessment finds that the ACEBO role meets the criteria for a SES 2 position, we will formally upgrade the position. Pending assessment results, the department will commence a recruitment process for an SES 2 ACEBO position by November 2025.

6.7 Are there effective policy, governance and other organisational arrangements in place to deliver the intended outcomes for environmental biosecurity?

DAFF has developed comprehensive biosecurity policies, processes and systems to protect Australia from the entry of invasive, exotic species across various pathways. This includes conducting risk analyses and assessments for specimens of environmental significance. While these efforts are primarily focused on safeguarding trade, agriculture and livestock industries, they also contribute to protecting against pests, weeds and diseases that pose an environmental risk.

It is crucial that Australia's biosecurity standards and processes for managing environmental biosecurity are elevated to the same high standards as those in agricultural industries (crops and livestock). This is necessary to ensure a consistent appropriate level of protection (ALOP) in response to future challenges, operational changes, budget constraints and the evolving international biosecurity landscape.

In the absence of a strategic plan, the Inspector-General is concerned about the complexity of environmental biosecurity governance in Australia and recommends reforms to streamline biosecurity management.

At the organisational level, the departments need to consider how machinery of government changes impact on existing governance and reporting structures. This may include:

- reviewing corporate plans, policies and performance measures
- reviewing and updating financial and non-financial delegations
- assessing the organisational structure and reviewing the reporting and accountability arrangements
- reviewing all existing contracts, leases and litigation and identifying where these now belong
- managing the handover of records
- ensuring that all information is securely stored in approved business applications and systems
- considering and addressing the potential impact on staff
- assessing outstanding issues identified in internal and external reviews and audit and other matters (such as noncompliances) being investigated.

In managing the changes, departments should also develop a clear and comprehensive communication strategy that addresses:

- communication of expectations with key stakeholders, including ministers
- keeping staff informed of the process
- communicating with stakeholders of relevant changes to policies and operations (QAO 2023).

It is important that the secretaries of these 2 departments collaborate to resolve issues such as poor coordination, confusion about shared responsibilities and ineffective communication to overcome disruptions. This will ensure Australia's biosecurity system remains responsive, effective and well resourced in protecting both agriculture and the environment from biosecurity threats (Recommendation 6). Additionally, a proposal should be developed for the Australian Government's consideration to protect environmental biosecurity from future machinery of government changes, ensuring continuity in its policy and operational activities. This should also include assured ongoing funding for environmental biosecurity programs.

Currently, the roles and responsibilities of the 2 main departments involved in environmental biosecurity risk management are not clearly delineated in a structured or formal manner. Instead, they operate more on an informal agreement. While regular and defined arrangements are in place between DAFF and DCCEEW, a more formalised structure could reduce ambiguity, improve accountability and potentially improve the delivery of intended outcomes for environmental biosecurity. It is concerning that no progress has been made in establishing a formal collaborative arrangement, despite multiple independent recommendations (see [Table 5](#)). It is recommended that the 2 agencies work together to prioritise the development and implementation of a functional memorandum of understanding (Recommendation 3). Such an agreement would allow them to leverage each other's strengths and expertise more effectively. Without a formal arrangement, there are fewer opportunities for coordinated efforts, shared learning and strategic actions to address environmental biosecurity challenges.

7 Exotic Environmental Pest List

The Exotic Environmental Pest List (EEPL) is a key tool used in managing biosecurity risks to the environment and social amenity. The EEPL identifies exotic pests and diseases that pose significant risks to Australia’s environment and aims to guide national biosecurity efforts and raise awareness among stakeholders.

In the past decade, a number of independent inquiries and reviews recommended DAFF to develop a national priority list of environmental pests and diseases ([Table 5](#)).

Table 5 Independent inquiries and reviews recommending development of Australia’s national priority list of environmental pests and diseases

Inquiring or reviewing body	Recommendation
Senate Environment and Communications References Committee (2015)	[Recommendation 9] The committee recommends that the Department of the Environment [now the Department of Climate Change, Energy, the Environment and Water] work with the Department of Agriculture [now the Department of Agriculture, Fisheries and Forestry] to develop and publish a national priority list of pests and diseases not yet established in Australia that are of environmental biosecurity concern.
Craik et al. (2017)	[Recommendation 11] The NBC should adopt a systematic approach to determine and plan for national priority pests and diseases: <ul style="list-style-type: none"> • Three national priority lists—one each for animal, plant and environmental pests and diseases—should be developed in partnership with system participants. • The three national lists should be completed by 2020. • Thereafter, the NBC should lead reviews of the national priority lists at least every five years, reporting to AGSOC and AGMIN.
Inspector-General of Biosecurity (2019)	[Recommendation 5] The department [DAFF] should establish a dynamic and transparent environmental pest and disease risk prioritisation process, informed by new scientific knowledge, to allow emerging environmental pests and diseases to be added to the priority list as they arise. This list of priority environmental biosecurity pests and diseases, with the basis for their inclusion, should be published on the department’s website and continuously reviewed.

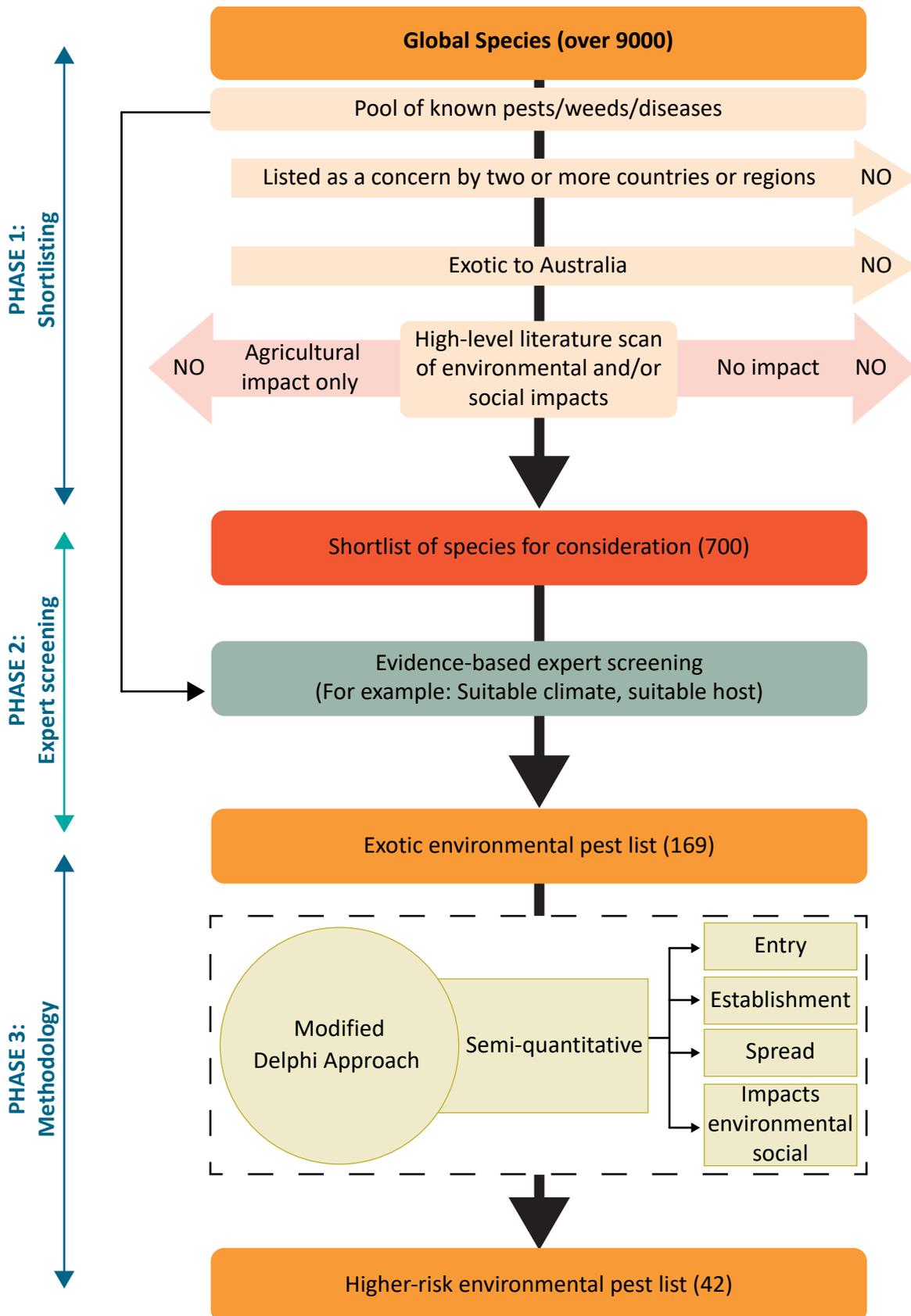
The Inspector-General notes that the EEPL does not list all organisms that pose risks to the environment and social amenity in Australia. However, the list covers a broad range of organisms, so any unlisted environmental biosecurity risk species will most likely fit within one of the 8 biological groups in the EEPL. Therefore, many actions and measures that mitigate the risk of EEPL species to Australia based on biological groupings and pathways would potentially reduce the risk posed by unlisted and unrecognised risk species of the same biological group.

7.1 Process of developing the EEPL

The EEPL process was developed with expert and stakeholder input to identify species posing significant environmental biosecurity risks. Contributors included representatives from government, industry and research organisations, ensuring a robust and balanced approach.

Expert input was provided by organisations such as the Centre of Excellence for Biosecurity Risk Analysis, the Centre for Invasive Species Solutions, the Commonwealth Scientific and Industrial Research Organisation (CSIRO), Animal Health Australia, Plant Health Australia, Wildlife Health Australia, as well as researchers and environmental biosecurity stakeholders from universities and museums and representatives from Commonwealth and state and territory governments. As shown in [Figure 1](#), the process consisted of 3 phases.

Figure 1 Species selection for the National Priority List of Exotic Environmental Pests, Weeds and Diseases



Source: ABARES (2021)

7.1.1 Phase 1 – shortlisting

Phase 1 involved identifying global species for shortlisting, resulting in a pool of over 9,000 species, which were narrowed down to approximately 700 based on invasive records and impacts to environment and social amenity across the 8 biological groups (aquatic animal diseases, freshwater invertebrates, marine pests, native animal diseases, plant diseases, terrestrial invertebrates, vertebrate pests and weeds and freshwater algae).

7.1.2 Phase 2 – expert screening

Phase 2 involved expert screening to select 20–25 candidate species per biological group, based on factors such as invasive elsewhere, habitat suitability, suitable hosts or vectors and potential entry pathways. This phase resulted in 169 candidate species, forming the EEPL.

7.1.3 Phase 3 – expert elicitation

The final phase used structured expert elicitation and a semi-quantitative method to assess the likelihood of entry, establishment, spread and the environmental and social impacts of each species. Each expert assessed about 10 species, providing scores and confidence levels based on evidence. Sensitivity analysis ensured a consistent ranking and identified 42 species (5–6 species per thematic group) as the higher risk in the EEPL.

The EEPL was endorsed by the National Biosecurity Committee and publicly released in late 2020, with an implementation plan approved in 2021. Full methodology used for developing EEPL is published in the ABARES' 2021 report. A complete list of exotic environmental pests is published on DAFF's [website](#).

7.1.4 Ongoing review and updates

The list is regularly reviewed and updated based on new information, emerging threats and changes in circumstances. This helps keep Australia's biosecurity measures proactive and relevant.

The Inspector-General acknowledges that DAFF used a systematic and scientific approach in developing the National Priority List of Exotic Environmental Pests, Weeds and Diseases (the EEPL). He noted that, in developing the EEPL, ABARES, in collaboration with other key areas of DAFF, extensively consulted over 100 experts from various governmental and research institutions and analysed more than 9,000 potential threats, including viruses, bacteria, fungi, plants and animals. To inform the process, it also reviewed methodologies that New Zealand, the United States of America and Europe used to develop priority lists; and consulted with list makers for further insights (ABARES 2021). Thereafter, ABARES shared its methodology for developing and prioritising species with the Centre of Excellence for Biosecurity Risk Analysis (CEBRA) and further refined it based on expert feedback.

7.2 Use of EEPL for environmental biosecurity management

The EEPL plays a critical role in shaping policy formulation and developing risk mitigation measures for environmental biosecurity management. It helps guide the development of targeted, evidence-based policies and strategies. The value of the EEPL cannot be emphasised enough as it enables DAFF to:

- *guide national biosecurity efforts by identifying and ranking high-risk exotic pests, weeds and diseases* – to help policymakers focus on the most significant threats to the environment in ensuring that resources and efforts are directed toward managing those risks effectively and efficiently
- *prioritise risk consistent with Australia's appropriate level of protection (ALOP)* – as the EEPL's development process involves a structured risk assessment that evaluates species based on their likelihood of entry, establishment, spread and potential environmental and social impacts. This helps formulate targeted risk mitigation strategies for species that pose the greatest threat
- *use informed decision-making* – a scientifically rigorous and expert-reviewed EEPL supports evidence-based decision-making in policy formulation by allowing the decision-maker to address specific risks in a systematic and informed manner, ensuring that biosecurity strategies are based on the best available data
- *allocate resources* – the list helps determine where to allocate resources for prevention, surveillance and control efforts, as it guides DAFF and state and territory government agencies in focusing on the most critical risks, allowing for more efficient use of limited resources

- *mitigate the introduction and spread of pests through formulation of prevention strategies* – such as import restrictions, quarantine measures and monitoring protocols for species on the list
- *use targeted surveillance and early detection* – by ensuring that monitoring systems are focused on detecting high-risk species of environmental concern. This helps address potential threats early, facilitating quick responses to prevent their establishment
- *develop risk mitigation frameworks* – by identifying species requiring targeted intervention. This includes control or eradication efforts, restoration programs for impacted ecosystems and collaboration with stakeholders such as industries, researchers and local communities to manage risks effectively and efficiently.

DAFF notes that there are some shortcomings of the EEPL. It includes some hazards that:

- are not nationally notifiable
- are known to be present in Australia
- are not subject to any control measures
- do not appear to be causing significant harm (for example, parrot bornavirus).

7.3 EEPL action plan

The ACEBO is the custodian of the EEPL. The ACEBO also coordinates amendments and review(s) of the list, with the oversight of the Environment and Invasives Committee (EIC). Following the release of the EEPL in late 2020, in April 2021 the former ACEBO developed an EEPL implementation (action) plan and assumed responsibility for coordinating its delivery. The plan outlines strategies for managing the environmental biosecurity risks posed by exotic species in Australia, focusing on 168 species identified in the EEPL. The plan:

- is guided by key principles such as prioritising effort, leveraging existing programs and fostering collaboration. It targets 8 biological groups of species, with specific risk-reduction measures across the biosecurity spectrum, including prevention, detection, preparedness and response, containment and eradication and management
- encompasses key activities such as improving diagnostic capabilities, expanding surveillance programs, enhancing border inspections, supporting community engagement for pest reporting, and refining risk assessments
- includes partnerships with state and territory biosecurity programs to ensure the alignment of efforts and efficient use of resources
- recognises that the EEPL species list will evolve over time as new information becomes available. Regular reviews and updates will ensure that the plan remains relevant and effective in addressing emerging environmental biosecurity risks.

However, it remains unclear as to why the draft plan has not been finalised and its execution has not progressed. The Inspector-General notes that:

- since the EEPL and draft action plan were developed, several new biosecurity strategies, a framework and an action plan has been published, including:
 - Commonwealth Biosecurity 2030: Action Plan 2023 (refreshed to [DAFF Biosecurity 2030 Roadmap](#) in October 2024)
 - National Biosecurity Strategy
 - National Plant Biosecurity Strategy (and sub-strategies covering diagnostics, preparedness and surveillance)
 - the Global Biodiversity Framework under the Convention on Biological Diversity
 - the Threatened Species Action Plan
- based on the above strategies, in 2024, the ACEBO revised the draft plan and further developed it into an ‘action plan’. Since then, ACEBO has consulted the Environmental Biosecurity Advisory Group on the scope and structure of the action plan and engaged with key stakeholders. On finalising the action plan, ACEBO will seek endorsement from the EIC before its release. However, the timeline is not known (Recommendation 7).

Recommendation 7

The Australian Chief Environmental Biosecurity Officer should, as a priority, finalise the action plan for the Exotic Environmental Pest List (EEPL). The action plan should include clear timelines, resource allocation and measurable outcomes. This should be supported by a robust framework outlining clear processes in consultation with relevant stakeholders across government, industry and research sectors to ensure effective and efficient execution of the EEPL.

Department's response: The department accepts the recommendation.

The department in consultation with stakeholders, and in collaboration with state and territory governments, is updating and aligning the EEPL Action Plan with current biosecurity strategies. The Action Plan will outline a high-level national work program to identify and prioritise actions to reduce the risk of entry, establishment, and spread of priority exotic environmental biosecurity species in Australia.

7.4 Review of the EEPL

The rationale for reviewing the EEPL is to strengthen Australia's biosecurity and manage invasive species threatening ecosystems and agriculture. As new data and evidence emerge, it is vital to update the EEPL, ensuring it addresses current risks and challenges. It will also ensure the purpose of the EEPL, and listing criteria of the EEPL species and methodology, remain appropriate. DAFF integrates the EEPL into its broader biosecurity systems, supporting prevention, detection, preparedness, response, containment and management efforts. This ongoing process helps remove established species, add new high-risk pests and maintain effective biosecurity measures, ultimately supporting environmental health.

In its report, *Technical information about the Exotic Environmental Pest List* (ABARES 2021), ABARES noted:

The EEPL and its underpinning purpose, listing criteria and methodology will be subject to regular review. The first review of the list is intended to be undertaken within three years of the list's completion, to ensure its effectiveness. However, subsequent reviews are expected to be undertaken less frequently (every five years after the initial review). Importantly, the process has been developed to ensure that it can be built upon as new information arises, and mechanisms have been put in place to ensure that ad hoc amendments can be made to the list, including assessment of new recognised higher-risk species.

Since the release of the EEPL, in September 2023 ABARES reviewed the EEPL to identify gaps in surveillance and preparedness of EEPL species, which informed future action plans and enhance risk reduction activities. The Inspector-General agrees that EEPL would contribute positively to policy formulation and devising risk mitigation measures relevant to environmental biosecurity. However, to ensure biosecurity measures remain relevant and responsive to emerging threats over time, the Inspector-General recommends that DAFF should develop a strategy and adopt a dynamic approach for periodic reviews of the EEPL that allow for continuous improvement in risk management strategies (Recommendation 8).

Recommendation 8

DAFF should periodically conduct a comprehensive and transparent review of the Exotic Environmental Pest List for currency and appropriateness, and apply updates to reflect new threats, emerging species and changing circumstances so that policies and preventative biosecurity operations remain responsive to the environmental threats.

Department's response: The department accepts the recommendation.

On behalf of all Australian governments, the department commenced a review of the EEPL in August 2025 which is scheduled to be completed in early 2026. The objective of the review is to update the EEPL to reflect emerging or changed risks.

The Inspector-General recommends that, in reviewing the EEPL, the following areas be considered for improved environmental biosecurity outcomes:

- *Broaden the scope of risk assessment beyond a few ant species:* The current approach is criticised for focusing on only 2 ant species, even though there are many more invasive ant species that should be prioritised. The suggestion is to expand the assessment to cover a wider range of invasive insect species.
- *Fully utilise existing 'pathways work':* Although work on how invasive species enter has been done and published, its application within DAFF is limited. This valuable information should be more actively and broadly used to prevent new introductions.
- *Increase transparency about risk assessment criteria and species representation:* The criteria used to select species for the EEPL are unclear, and this information is not published to allow public scrutiny and understanding – implying a need for greater transparency and accountability.

7.5 Was there an adequate process for developing the EEPL?

DAFF used a systematic and scientific approach in developing the [National Priority List of Exotic Environmental Pests, Weeds and Diseases](#). DAFF's ABARES, in collaboration with other key areas of DAFF, extensively consulted over 100 experts from various government and research institutions and analysed more than 9,000 potential threats, including viruses, bacteria, fungi, plants and animals. This, through a systematic consultative and transparent approach, allowed development of Australia's EEPL based on the best available scientific knowledge.

ABARES also reviewed methodologies used for developing priority lists, by New Zealand, the United States of America and Europe to inform the process and consulted with list makers for further insights. Thereafter, ABARES shared its methodology for developing and prioritising species with the CEBRA and further refined it based on expert feedback. Ongoing and timely reviews of the EEPL are required to ensure updates are applied to reflect new threats, emerging species and changing circumstances.

7.6 How does the EEPL contribute to policy formulation, including devising risk mitigation measures for environmental biosecurity?

The EEPL is crucial in protecting Australia's environment, as it identifies and ranks exotic pests, diseases and weeds that could harm Australian ecosystems, guiding national biosecurity efforts and increasing awareness. A scientifically rigorous and expert-reviewed EEPL:

- helps prioritise species that pose the highest threat
- supports evidence-based decision-making in policy formulation
- helps policymakers develop targeted risk mitigation measures by allowing for more efficient use of limited resources
- supports the development of comprehensive risk mitigation frameworks by identifying species requiring targeted intervention
- helps with targeted surveillance and early detection by ensuring monitoring systems are focused on detecting high-risk species.

In addition, the dynamic process of ongoing review of the EEPL allows for continuous improvement in risk management strategies and ensures that biosecurity measures remain relevant over time. However, an area of considerable concern that remains unaddressed is the stalled EEPL implementation plan, which includes strategies for managing the environmental biosecurity risks posed by 168 high-risk, exotic species identified in the EEPL. In 2022, the ACEBO developed the draft EEPL implementation plan and assumed responsibility for its delivery. It remains unclear as to why the draft plan has not been finalised and its execution has not progressed since.

Until the implementation plan is executed, crucial steps such as resource allocation and timelines of delivering the crucial tasks cannot be progressed. This will adversely impact the achievement of the plan's objectives and leave Australia exposed to exotic pests, weeds and diseases (Recommendation 7).

Conclusion

The increase in global trade, climate change and human and goods movement leaves Australia highly vulnerable to exotic pests, weeds and diseases. These threats pose a severe risk to the nation's agriculture, biodiversity, ecosystems, social amenity and public health. Effective mitigation requires constant vigilance, enhanced border protection, stronger inter-agency collaboration and sustained public awareness.

Australia has a robust legal framework for biosecurity, primarily through the *Biosecurity Act 2015* and the *Environment Protection and Biodiversity Conservation Act 1999*. These Acts cover both direct and indirect environmental biosecurity risks from live imports. However, the effectiveness of this framework is significantly hampered by a lack of cohesive implementation and governance challenges, which notably include:

- *Undermined leadership:* The Australian Chief Environmental Biosecurity Officer role has suffered from frequent, disruptive machinery of government changes, leading to a lack of clear strategic direction, weakened influence and a perception that environmental biosecurity is less important than trade-focused biosecurity.
- *Persistent siloing:* There is a continuing problem of siloed behaviours within DAFF, which obscures accountability and reduces efficiency in managing complex, cross-cutting biosecurity risks.
- *Impact of machinery of government changes:* Frequent organisational restructures within DAFF have caused widespread disruption, including confusion over roles, coordination challenges, loss of expertise, inefficient resource allocation and delayed responses to threats.
- *Lack of formal collaboration:* A critical absence of a formal memorandum of understanding between DAFF and DCCEEW leads to ambiguity, reduces accountability and delays critical processes.

The Exotic Environmental Pest List (EEPL) is a vital, scientifically developed tool for identifying and prioritising high-risk exotic pests. It was created through a comprehensive and consultative process, involving extensive expert input and international reviews. While the EEPL is crucial for evidence-based policy formulation and risk mitigation, its full potential is severely hampered by the stalled implementation plan. The unfinalised and unexecuted 2022 draft plan for managing high-risk species on the EEPL prevents essential resource allocation and task timelines.

In essence, while Australia possesses the legislative foundation and a scientifically sound tool for prioritising activities to manage environmental biosecurity risks (that is, the EEPL), systemic issues in governance, interdepartmental collaboration and leadership are preventing the most effective delivery of intended outcomes for environmental biosecurity.

Appendix A: Agency response

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ACTING SECRETARY

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Dear Dr Klumpp

Thank you for your correspondence of 12 September 2025 and the draft review report:
Environmental biosecurity - management and policy implementation.

I welcome the insights, findings and recommendations provided in the draft report, particularly regarding the effectiveness of current legislative and policy arrangements in delivering environmental biosecurity outcomes. These observations will guide ongoing efforts to enhance our national biosecurity framework to protect Australia's agriculture industries, natural environment and way of life.

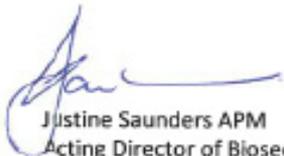
My formal response to each of your eight recommendations is provided at [Attachment A](#).

Since the establishment of the Australian Chief Environmental Biosecurity Officer (ACEBO) in 2018, the department has made significant progress in strengthening environmental biosecurity and providing national leadership and strategic direction across prevention, detection and response to exotic and established pests, weeds and diseases. The review and application of the Exotic Environmental Pest List (EEPL) is a key priority with collaborative work underway to update the EEPL, along with an EEPL Action Plan to improve the management of biosecurity risks to the environment.

Your recommendations on clarifying roles and responsibilities, within and outside of the department, offer the chance to revisit partnerships and procedural arrangements in collaboration with the Department of Climate Change, Energy the Environment and Water and other stakeholders. This aligns with our commitment to shared governance through the National Biosecurity Strategy.

The department has assessed the report and does not consider its release to be prejudicial to the public interest. However, as advised previously by the department, some inaccuracies remain in the draft review report, particularly regarding definitions under the *Biosecurity Act 2015* (the Act). I recommend that you consider addressing these inaccuracies before finalising your report, and my team will send through the specifics of this advice separately.

Thank you again for your report and recommendations.



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9 October 2025

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Attachment A: Department of Agriculture, Fisheries and Forestry (DAFF) – response to the Inspector-General of Biosecurity report: Environmental biosecurity: Management and policy implementation.

Recommendation 1

DAFF should maintain and clarify its leading role in comprehensive biosecurity risk analysis for all specimens of exotic species imported into Australia. To achieve this, led by the Australian Chief Environmental Biosecurity Officer, DAFF must proactively collaborate with the Department of Climate Change, Energy, the Environment and Water, providing necessary technical support (including from entities like the Australian Bureau of Agricultural and Resource Economics and Sciences). This collaboration should ensure that all potential biosecurity risks with environmental significance, are comprehensively and satisfactorily addressed as part of a harmonised process involving both departments.

Department response

The department accepts the recommendation.

The department will maintain and better clarify its lead role in delivering risk analysis processes in accordance with the *Biosecurity Act 2015*. The department's biosecurity risk policy is based on the assessment and management of pest and disease risk to human, animal and plant health and the environment. The department's risk analysis processes involve consultation and collaboration with stakeholders, and the department regularly reviews these to ensure roles and responsibilities are understood and processes remain transparent, effective and fit for purpose.

The department and the Department of Climate Change, Energy, the Environment and Water (DCCEEW) each have distinct roles in accordance with the *Biosecurity Act 2015*, and the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*. Acknowledging these respective differences, the department will continue to work collaboratively with DCCEEW to harmonise processes that support the assessment and management of environmental biosecurity risks where appropriate and practicable.

Recommendation 2

DAFF should work closely with DCCEEW to develop processes and policies in the implementation of decisions regarding environmental biosecurity to ensure that regulation under both Acts are fit for purpose and comprehensive.

Department response

The department accepts the recommendation.

The department will continue to implement legislation, develop and apply policies and processes that protect the environment from biosecurity threats posed by pests and diseases. In doing so, the department will work closely with DCCEEW to ensure a coordinated and consistent approach through each Act, where relevant to environmental biosecurity.

Recommendation 3

DAFF should, as a priority, take a lead in developing a Memorandum of Understanding (MoU) with the Department of Climate Change, Energy, the Environment and Water. The MoU should set out the representation, working relationship, expectations, roles, responsibilities and duties of both departments at strategic, policy and operational levels including in relation to import risk analyses, emergency response to pests and diseases of environmental biosecurity concern, and live animal import policy.

Department response

The department accepts in principle the recommendation.

The department considers coordinated effort, shared learnings and strategic action for environmental biosecurity is not prohibited in the absence of a MoU with DCCEEW. The Environmental Biosecurity Interdepartmental Group (EBIG) is the formal mechanism for both departments to engage regularly on environmental biosecurity matters. An MoU between agencies is a governance mechanism, that would likely be broader in scope for both departments than environmental biosecurity. The department will, in consultation with DCCEEW, assess the additional benefits of developing a MoU to formally document roles, responsibilities and ways of working between departments. However, we will also ensure that current governance is fit for purpose.

Recommendation 4

DAFF, in consultation with DCCEEW and key stakeholders, must urgently develop and sustainably resource a comprehensive Environmental Biosecurity Strategy, ensuring it is a collaborative blueprint that deeply integrates environmental expertise (internal and external) to protect Australia's natural assets.

Department response

The department accepts in principle the recommendation.

There are existing individual and overarching strategies that address environmental biosecurity such as the National Biosecurity Strategy 2022-2032 (NBS), which the department plays a key role in delivering, and which already provide a mechanism to deliver on the intent of this recommendation. In consultation with DCCEEW and key stakeholders, the department will consider the need for a collaborative and integrative strategic blueprint specifically for environmental biosecurity outcomes (e.g. a Strategic Partnership Statement for both agencies). This will better clarify the Commonwealth's environment biosecurity priorities but linked to existing national strategies. The department considers that this will be a more fit for purpose approach than creating a new strategy and will avoid duplication.

Recommendation 5

As prescribed in the Environmental Biosecurity Framework, the Environmental Biosecurity Office should regularly produce an Environmental Biosecurity Status Report. The status report is crucial to maintain a shared understanding of the current state of environmental biosecurity; guide coordinated action and prioritise efforts against new and emerging threats.

Department response:

The department notes the recommendation.

The department is committed to environmental biosecurity reporting that supports a shared understanding, coordinated action and prioritises emerging threats. The department proposes to include a dedicated Environmental Biosecurity Status Report into planned NBS reporting (with the first NBS Action Plan annual report proposed for early 2026). This will include information on environmental biosecurity risks and actions. This approach will still provide transparency but will be more effective and efficient.

Recommendation 6

The Australian Government should stabilise the Environmental Biosecurity Office at a level consistent with that of the Australian Chief Veterinary Officer and Australian Chief Plant Protection Officer roles and strengthen the role of the Australian Chief Environmental Biosecurity Officer to improve overall coordination in environmental biosecurity efforts. Ensuring stability and providing the necessary leadership, resources and cross-departmental integration will enable the government to better protect agriculture and the environment from emerging biosecurity threats.

Department response

The department accepts in principle the recommendation.

The department is in the process of reclassifying the Australian Chief Environmental Biosecurity Officer (ACEBC) role to a Senior Executive Service (SES) Band 2, consistent with the current Australian Chief Veterinary Officer and Australian Chief Plant Protection Officer positions. The classification of an individual role is determined by the requirements of the position and assessed against the Australian Public Service (APS) Work Level Standards. We are progressing an assessment. If this assessment finds that the ACEBC role meets the criteria for a SES 2 position, we will formally upgrade the position. Pending assessment results, the department will commence a recruitment process for an SES 2 ACEBO position by November 2025.

Recommendation 7

The Australian Chief Environmental Biosecurity Officer should, as a priority, finalise the action plan for the Exotic Environmental Pest List (EEPL). The action plan should include clear timelines, resource allocation and measurable outcomes. This should be supported by a robust framework outlining clear processes in consultation with relevant stakeholders across government, industry and research sectors to ensure effective and efficient execution of the EEPL.

Department response

The department accepts the recommendation.

The department in consultation with stakeholders, and in collaboration with state and territory governments, is updating and aligning the EEPL Action Plan with current biosecurity strategies. The Action Plan will outline a high-level national work program to identify and prioritise actions to reduce the risk of entry, establishment, and spread of priority exotic environmental biosecurity species in Australia.

Recommendation 8

DAFF should periodically conduct a comprehensive and transparent review of the Exotic Environmental Pest List for currency and appropriateness, and apply updates to reflect new threats, emerging species and changing circumstances so that policies and preventative biosecurity operations remain responsive to the environmental threats.

Department response

The department accepts the recommendation.

On behalf of all Australian governments, the department commenced a review of the EEPL in August 2025 which is scheduled to be completed in early 2026. The objective of the review is to update the EEPL to reflect emerging or changed risks.

Appendix B: Project funding and pest-specific preparedness plans for ‘top 42’ EEPL species

Exotic environmental pests, weeds and diseases		Preparedness plan*	Funding# (\$)
Aquatic animal diseases			
1.	Crayfish plague (infection with <i>Aphanomyces astaci</i>)	✓	
2.	Megalocytivirus (infection with infectious spleen and kidney necrosis virus (ISKNV) and red sea bream iridovirus (RSIV))	✓	60,000
3.	White spot syndrome virus (infection with WSSV)	✓	
4.	Yellow head disease (infection with yellow head virus 1, YHV1)		40,000
Plant diseases			
5.	Ceratocystis wilt (<i>Ceratocystis manginecans</i> and another exotic <i>Ceratocystis</i> spp.)		25,000
6.	Exotic strains of myrtle rust (<i>Austropuccinia psidii</i>)	✓	440,000
7.	Polyphagous shot hole borer associated fusarium wilt (<i>Fusarium euwallaceae</i>)	✓	
8.	Ramorum shoot dieback and leaf blight (<i>Phytophthora ramorum</i>)	✓	275,000
9.	Xylella (<i>Xylella fastidiosa</i>)	✓	530,000
Terrestrial invertebrates			
10.	Asian spongy moth (<i>Lymantria dispar</i>)	✓	
11.	Giant African snail (<i>Achatina fulica</i>)	✓	350,000
12.	Invasive ants: red imported fire ant (<i>Solenopsis invicta</i>) and electric ant (<i>Wasmannia auropunctata</i>)	✓	905,000
Marine pests			245,000
13.	Asian green mussel (<i>Perna viridis</i>)	✓	
14.	Black-striped false mussel (<i>Mytilopsis sallei</i>)	✓	
15.	Carpet sea squirt (<i>Didemnum vexillum</i>)	✓	
16.	Chinese mitten crab (<i>Eriocheir sinensis</i>)*	✓	
17.	Lady crab / Asian paddle crab (<i>Charybdis japonica</i>)	✓	

Vertebrate pests		
18.	Asian black-spined toad (<i>Duttaphrynus melanostictus</i>)	✓
19.	Corn snake (<i>Pantherophis guttatus</i>)	35,000
20.	Boa constrictor (<i>Boa constrictor</i>)	35,000
21.	Red-eared slider turtle (<i>Trachemys scripta elegans</i>)	260,000
Native animal diseases		165,000
22.	White nose syndrome of bats (<i>Pseudogymnoascus destructans</i>)	✓ 620,000
Weeds and freshwater algae		
23.	Didymo (<i>Didymosphenia geminata</i>) – freshwater diatom (algae)	✓
24.	Mikania (<i>Mikania micrantha</i>)	✓
25.	Mouse-ear hawkweed (<i>Hieracium pilosella</i>)	✓

* Preparedness plans are often combined with or named contingency and/or response plans.

Funding only includes EBPF funds and other funds from across DAFF that focus only on the specific species or group of species (that is, not risk mitigation measures for native species).

Glossary

Acronym	Term
ABARES	Australian Bureau of Agricultural and Resource Economics
ACPPO	Australian Chief Plant Protection Officer
ACEBO	Australian Chief Environmental Biosecurity Officer
ACVO	Australian Chief Veterinary Officer
AGSOC	Agriculture Senior Officials Committee
ALOP	appropriate level of protection
APS	Australian Public Service
CBD	Convention on Biological Diversity
CEBRA	Centre of Excellence for Biosecurity Risk Analysis
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CNP	conditionally non-prohibited
CSIRO	Commonwealth Scientific and Industrial Research Organisation
DAFF	Department of Agriculture, Fisheries and Forestry
DCCEEW	Department of Climate Change, Energy, the Environment and Water
EBIG	Environmental Biosecurity Interdepartmental Group
EBO	Environmental Biosecurity Office
EBPF	Environmental Biosecurity Project Fund
EEPL	Exotic Environmental Pest List
EIA	environmental impact assessment
EIC	Environment and Invasives Committee
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
HPAI	High Pathogenicity Avian Influenza
IGAB	Intergovernmental Agreement on Biosecurity
IRA	Import Risk Analysis
IUCN	International Union for Conservation of Nature
Live Import List	List of Specimens Taken to be Suitable for Live Import
MoU	memorandum of understanding
NBC	National Biosecurity Committee
NBS	NBS National Biosecurity Strategy 2022–2032
NEBRA	National Environmental Biosecurity Response Agreement
PDD	proventricular dilatation disease
Red List	Red List of Threatened Species
SES	Senior Executive Service
SPF	specific pathogen-free
SPS Agreement	Agreement on the Application of Sanitary and Phytosanitary Measures

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