



Review of the implementation of the IGB recommendations to improve the Australian biosecurity system

Review report no. 2025–26/03



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Executive summary

The Inspector-General of Biosecurity (Inspector-General) provides assurance over Australia's biosecurity risk management systems through impartial and transparent scrutiny. This review examines the department's actions to implement recommendations published in past Inspector-General reviews.

The review concludes that, despite repeated scrutiny and multiple reform attempts, the Department of Agriculture, Fisheries and Forestry continues to face persistent, systemic challenges in managing the implementation of Inspectors-General recommendations. Key weaknesses include fragmented governance, inconsistent tracking, inadequate documentation of closure of recommendations and a lack of centralised oversight. The absence of a unified governance framework and integrated reporting system has hindered strategic oversight, delayed reforms and contributed to the backlog of open recommendations – particularly in the areas of governance, risk mitigation and better practice.

The review highlights that recommendations should not be treated as administrative burdens but as opportunities for continuous improvement. The timeliness of implementation should be driven by internal commitment and stakeholder confidence, not just external scrutiny, to avoid delayed resolution of high-risk recommendations. The department's reliance on outdated systems and manual processes, compounded by the decommissioning of legacy platforms without robust data migration, has resulted in the loss of critical records and institutional knowledge.

To address these challenges, the department should build on the Biosecurity Strategy and Reform Division's work on the development of a governance framework and a policy for managing recommendations and fully implement the framework.

The Inspector-General proposes a suite of strategic reforms:

- Implement a risk-based prioritisation model to guide planning and resource allocation.
- Procure and deploy an enterprise-grade Audit and Recommendation Management System (ARMS) to centralise and streamline tracking.
- Develop robust data migration and retention protocols to safeguard institutional knowledge.
- Enhance transparency through regular reporting and stakeholder engagement.
- Continue engaging with the Inspector-General in the implementation process.

These reforms are essential not only for resolving existing recommendations but also for strengthening the department's capacity to respond to future biosecurity threats. The department must shift from a compliance-driven mindset to a culture of continuous improvement, using recommendations as a catalyst to reinforce Australia's biosecurity system against evolving global challenges.

Review recommendations and departmental response

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

Recommendation 1

The department should urgently procure and implement a single, integrated and certified enterprise-grade Audit and Recommendation Management System (aka ARMS) that is specifically designed to centralise, track and manage all findings and recommendations, irrespective of their originating body (Internal Audit, ANAO, Inspector-General of Biosecurity or external reviewers). This system must incorporate robust data management and migration capabilities to ensure the enduring preservation and accessibility of historical information, even during system upgrades, decommissioning and machinery of government changes.

Department's response: The department notes the recommendation.

The department continues to improve our governance system and enterprise performance and reporting as part of implementing the Transformation Action Plan. As part of this, the department is investigating an integrated system to track and manage recommendations from audits, assurance activities, and independent reviews. This will enable the most efficient, effective, and transparent approach to prioritise and implement improvements to organisational capability.

The department is currently evaluating the most suitable approach to identify and implement an integrated system, subject to funding availability. This system will meet data management and retention policies to ensure continuity of historical information.

Recommendation 2

The department should develop and implement a comprehensive data migration and retention framework including mandatory protocols for robust data backup, validation and transfer, to ensure the continuous and accessible preservation of all critical historical information when systems are decommissioned or replaced, or when the departmental responsibilities shift due to machinery of government changes.

Department's response: The department notes the recommendation.

Further to the response to recommendation 1, the department is committed to ensuring that information and records meet legislative requirements, relevant international standards, and guidance from the National Archives of Australia. The department's information governance framework provides record-keeping policies, procedures and training for all persons engaged in a business undertaking with the department.

The department will develop a records and information management plan for recommendations management. A decommissioned systems archival framework, supported by a digital archival solution, are deliverables of the Capital Security, Technology and Asset Refresh project which is underway. The project's objective is to establish a clear, information-centric process for managing and governing structured and unstructured data from decommissioned department IT systems throughout their archiving and disposal phases.

Recommendation 3

When the implementation of a recommendation faces extensions or delays, the department, in collaboration with the Inspector-General, should conduct a thorough re-assessment of associated risks and the urgency of timely action. This process will ensure the recommendation remains valid and that its implementation is strategically targeted for maximum effectiveness.

Department's response: The department agrees with the recommendation.

The department is committed to ongoing collaboration with the incoming IGB, including on approaches to the assessment of risks and urgency, to ensure the effectiveness and expediency of implementation of accepted IGB recommendations.

As you are aware, the department has recently established a refreshed governance framework for IGB recommendation management. The department is committed to ongoing improvement, and to continuing to refine its approach to IGB recommendation governance.

As part of the revised governance framework, the Biosecurity Operations and Compliance Group (BOCG) has established a Senior Executive Service level 2 Risk Management and Performance Reporting Working Group reporting to the BOCG Strategic Executive Forum to provide risk-based oversight of recommendations. As part of this oversight function, the department will monitor delayed implementation and associated risks to identify clear remedial actions and prioritisation of efforts needed. Reporting to the department's Audit and Risk Committee and Executive Board, as required, will also be part of this oversight. This will ensure transparency and accountability.

The department welcomes engagement with the IGB, as appropriate, as part of this re-assessment process.

Recommendation 4

The department should continue its collaboration with the Inspector-General of Biosecurity in reassessing open recommendations for their currency and its ability to progress implementation.

Department's response: The department agrees with the recommendation.

As part of the department's refreshed governance framework for IGB recommendation management, the department is embedding a risk-based approach to ensure a coordinated, holistic and thematic approach to recommendation implementation and closure. Specifically, the department is conducting a thematic review to ensure timely closure of outstanding and open IGB recommendations. This review is being completed against clear principles and risk ratings (i.e. practicality of implementation, validity of the recommendation and whether the recommendation requires new funding). The department is keen to address the intent of the recommendations and address the risks identified. This review will be completed by end-2025.

The department recognises the importance of an ongoing collaborative partnership with the IGB to address key risks and opportunities to strengthen the department's biosecurity activities. We would welcome engagement with the IGB, where appropriate, to test long-standing recommendation validity, underlying risks, and any relevant risk mitigations.

Recommendation 5

The department should adopt the governance framework proposed by the Biosecurity Strategy and Reform Division, with targeted enhancements for implementation to ensure it is operationally robust and delivers on its objectives. Priority actions include embedding detailed governance artefacts, introducing a risk-based tiered approach, strengthening closure and assurance processes, integrating reporting mechanisms and leveraging digital tools for tracking and analytics.

Department's response: The department agrees with the recommendation.

The department continues embedding a refreshed governance framework to enhance IGB recommendation management and implementation. This includes revised artefacts which will standardise tracking, monitoring and reporting against IGB recommendation progress to facilitate a more streamlined process for IGB recommendation management.

The department welcomes the suggestions for further refinements to ensure robust and effective products, tools, and reporting. Many of the additional suggestions for this recommendation, including areas for further refinement of procedures and artefacts, have been progressed. We will continue prioritising this work scheduled to be completed by early 2026 (with ongoing business improvements to be adapted, as required).

Recommendation 6

The next Inspector-General of Biosecurity should consider conducting a targeted review of the department's progress in implementing pending recommendations after the proposed governance framework has been adopted. This review should assess whether the enhanced governance arrangements—such as risk-based triage, escalation protocols, integrated reporting and digital tracking—are effectively driving timely, auditable and evidence-based closure of recommendations. Measuring performance in this way will provide assurance on the framework's effectiveness and identify any further improvements needed to strengthen accountability and continuous improvement.

Department's response: The department notes the recommendation.

The department considers that this recommendation is appropriate for the next IGB to consider. Notwithstanding this, the department welcomes the opportunity to work with the incoming IGB, as appropriate. This could include providing updates on progress of the refreshed governance framework, covering recommendation closures, long-standing recommendations, and related performance measures.



Dr Lloyd Klumpp
Inspector-General of Biosecurity

24 October 2025

1 Review process and methodology

The Department of Agriculture, Fisheries and Forestry is the lead regulatory agency for managing biosecurity in Australia. The Inspector-General of Biosecurity (Inspector-General) provides assurance over Australia's biosecurity risk management systems through impartial and transparent scrutiny. The Inspector-General's 2022–25 work program includes a review of the department's actions to implement recommendations published in past Inspector-General reviews.

1.1 The Inspector-General of Biosecurity

The Inspector-General's mission is to enhance the integrity of Australia's biosecurity system by independently evaluating and verifying the performance of the department's biosecurity programs, principally across pre-border and at the border. The Inspector-General review reports make recommendations for system improvements and provide an assurance framework for stakeholders. This helps the department stay sharp, accountable and ready for emerging threats while safeguarding Australia's agriculture, environment, economy and exports.

The *Biosecurity Act 2015* and Biosecurity Regulation 2016 define the Inspector-General's role, authority and independent powers of review. The Inspector-General operates at arm's length from the department and is responsible for reviewing the Director of Biosecurity's performance of functions and exercise of powers. By publishing review reports, the Inspector-General demonstrates that Australia's biosecurity system is credible, responsive and subject to independent oversight.

The Inspector-General's reviews often identify risks, gaps or systemic weaknesses in biosecurity measures (such as screening, risk assessments and import processes). This impartial scrutiny of biosecurity performance reassures stakeholders that reviews are not influenced by internal departmental interests or politics.

Furthermore, independent, evidence-based review reports on the performance of Australia's biosecurity system clearly show stakeholders what is working, what is not working and where improvements are needed. Transparency is further enhanced by shining light on internal processes that may otherwise remain hidden from external view.

1.2 Review purpose

The purpose of this review was to assess how the department ensures that Inspectors-General findings and recommendations published in their review reports are implemented to strengthen Australia's biosecurity system.

1.3 Review objectives and scope

The objectives of this desktop review were to:

- take stock of implementation status of recommendations published in the Inspectors-General review and incident reports since the enactment of the Biosecurity Act in June 2016
- examine department's governance arrangements and administrative processes for effective ongoing management of Inspectors-General findings and recommendations to assess sufficiency, currency and relevance of documented methodologies, processes and procedures the department uses in implementing recommendations.

1.4 Out of scope

This review did not:

- examine implementation of recommendations published in the Interim Inspectors-General of Biosecurity (IIGB) audit reports published between 2009 and May 2016
- consider recommendations published in reports published by independent reviewers and agencies, such as the Australian National Audit Office, the department's Internal Audit team, and consultants and third-party reviewers external to the department
- consider whether closed recommendations had achieved their intended purpose.

1.5 Review methodology

In conducting the review, the Inspector-General:

- conducted a desk audit of 246 recommendations published in 20 review reports and records of subsequent actions taken in implementing individual recommendations by reviewing:
 - the original recommendations and classifying them into themes
 - the department's responses to each recommendation at the time of publication of the reports
 - subsequent actions the department took in implementing each recommendation
 - whether the department had marked implementation of recommendations as complete (closed) and/or listed for further review by the Inspector-General in future
- reviewed the standard operating protocols and processes involved in handling (including the entry, retrieval and delegation) of recommendations
- reviewed the governance and performance oversight (suitability and efficacy) of the department's governance module in providing a suitable platform for tracking, decision-making and closure of review recommendations
- sought progress reports for implementing pending recommendations, including reviewing progress of pending recommendations requiring collaborative action by external parties, with timescales outside departmental control
- reviewed the department's proposed governance arrangements (framework and templates for reporting) for managing IIGB recommendations and making suggestions for improvement.

2 Historical handling of implementation

The department's regulatory biosecurity system is regularly reviewed (or audited) both internally and externally, including by the Inspector-General, the Australian National Audit Office (ANAO), the department's Internal Audit team and third-party consultants and reviewers who the department hires from time to time for specific needs.

These reviews and audits generate findings and recommendations that the department must implement for accountability and transparency; and to strengthen its policies, systems, processes and practices.

The department's Biosecurity, Operations and Compliance Group (Biosecurity Group) comprises 7 divisions, which collectively deliver and manage biosecurity activities. The Inspector-General notes that the findings and recommendations in external reviewers' or consultants' reports are managed by the relevant division(s).

2.1 Implementation status of recommendations

2.1.1 Inspectors-General reviews, 2016–25

Since the enactment of the Biosecurity Act in June 2016, the 3 Inspectors-General to date have published 22 reports, which contain 262 recommendations ([Table 1](#)).

Of the total 246 recommendations in scope of this review, the department advised the Inspector-General that it has implemented 178, and the remaining 68 recommendations are currently at various stages of implementation.

Table 1 Published Inspector-General of Biosecurity reviews, 2016–25

No.	Report title	Date published	Recommendations	
			Total	Open
1.	Review of the management and application of the import risk analysis process*	March 2025	10	10
2.	Strategy, governance and planning to strategically manage the department's biosecurity science resource*	March 2024	6	6
3.	Efficacy and adequacy of department's X-ray scanning and detector dog screening techniques to prevent entry of biosecurity risk material into Australia	July 2022	14	9
4.	Assurance review for arrangements to import live lumpy skin disease virus to CSIRO's Australian Centre for Disease Preparedness (both recommendations for noting)	July 2022	2	0
5.	Effectiveness of preventative biosecurity arrangements to mitigate the risk of entry into Australia of the serious plant pest <i>Xylella fastidiosa</i>	June 2022	14	11
6.	Robustness of biosecurity measures to prevent entry of khapra beetle into Australia	December 2021	13	12
7.	Accountable implementation of Inspectors-General recommendations	November 2021	10	2
8.	Confidence testing for at-border delivery of critical human biosecurity functions – Ruby Princess cruise ship incident	April 2021	42	6

No.	Report title	Date published	Recommendations	
			Total	Open
9.	Adequacy of department's operational model to effectively mitigate biosecurity risks in evolving risk and business environments	February 2021	19	15
10.	Biosecurity risk management of international express airfreight pathway for non-commercial consignments	July 2020	25	7
11.	Adequacy of preventative border measures to mitigate the risk of African swine fever	March 2020	13	0
12.	Effectiveness of Approved Arrangements in managing biosecurity risks in Australia	August 2019	13	2
13.	Implementation of Inspector-General of Biosecurity recommendations	July 2019	3	0
14.	Pest and disease interceptions and incursions in Australia	May 2019	5	1
15.	Effectiveness of biosecurity measures to manage the risks of brown marmorated stink bugs entering Australia	May 2019	14	0
16.	Environmental biosecurity risk management in Australia	April 2019	7	0
17.	Implementation of Interim Inspector-General of Biosecurity recommendations	September 2018	1	0
18.	Horse importation biosecurity risk management	September 2018	4	0
19.	Military biosecurity risk management in Australia	July 2018	5	1
20.	Hitchhiker pest and contaminant biosecurity risk management in Australia	July 2018	9	1
21.	Uncooked prawn imports: effectiveness of biosecurity controls	December 2017	22	0
22.	Review of Department of Agriculture and Water Resources management of biosecurity risks posed by invasive vector mosquitoes	May 2017	11	0
Total recommendations published in Inspectors-General reports (2016–17 to 2024–25)			262	84
Number of recommendations in scope of this review			246	68

* Reviews Nos 1 and 2 are not in scope of this review, as not enough time has lapsed since the publication of these reviews for the department to fully implement recommendations therein.

2.1.2 Theming of recommendations

The Inspector-General employed a themes-based approach to categorising recommendations, providing valuable, high-level insights for management, the Audit and Risk Committee and external stakeholders and fostering transparency ([Table 2](#)).

Table 2 Themes of Inspector-General recommendations, 2016–17 to 2024–25

Theme		Recommendations	
		Total	Open
1.	Governance/management	45	14
2.	Assurance and verification	38	5
3.	Better practice	25	8
4.	Working collaboratively	22	4
5.	Risk mitigation	16	8
6.	Surveillance	12	4
7.	Funding/resource allocation	12	4
8.	IT systems	10	3
9.	Legislation	10	1
10.	Risk analysis/assessment	10	4
11.	Technology	7	1
12.	Education and awareness	7	3
13.	Training	6	0
14.	Standard operating procedures	6	1
15.	Communication	5	1
16.	Data management	5	3
17.	Prevention, preparedness and response	4	1
18.	Co-regulatory arrangements	3	2
19.	Staffing	1	0
20.	Scientific expertise	1	1
21.	Risk ownership	1	0
Total		246	68

A total of 68 recommendations, out of 246 total recommendations issued between 2016–17, remain open. The themes with the most open recommendations are Governance/management (14 open out of 45), Risk mitigation (8 open out of 16) and Better practice (8 open out of 25). These areas collectively account for a significant portion of open recommendations and reflect deep-rooted challenges in oversight, strategic planning and operational execution. It is crucial that the department address these core issues, as their unresolved status hinders the implementation of other recommendations and impedes overall improvements to the biosecurity system.

The Inspector-General believes that, by analysing these thematic trends, the department can identify and address the root causes of implementation delays, leading to broader systemic reforms and continuous improvements within the biosecurity framework.

2.2 Recommendations pending implementation

[Table 3](#) shows that there is a growing backlog of pending recommendations, which is concerning. Crucially, the number of recommendations ‘pending implementation’ generally increased year on year from 2016–17 (0 pending) to 2021–22 (25 pending). In 2022–23 the total fell to 9, but the percentage remained high.

Table 3 Number of recommendations pending implementation, 2016–17 to 2022–23

Year of publication	Recommendations		Percentage of pending implementation
	Total published	Pending implementation	
2016–17	11	0	0
2017–18	31	1	3
2018–19	36	3	8
2019–20	54	9	16
2020–21	61	21	34
2021–22	37	25	68
2022–23	16	9	56
2023–24*	6	6	na
2024–25*	10	10	na

* Not in scope of this review, as not enough time has passed since the publication of these reports for the management to fully implement these recommendations. na = not applicable.

The number of open recommendations ([Table 1](#)) suggests there is a persistent and declining level of effectiveness and responsiveness in implementing recommendations. This is because either new recommendations are being issued at a faster rate than they are being closed or the department’s capacity to implement these recommendations has declined.

The Inspector-General acknowledges that substantial delays mean that recommendations can become obsolete before they can be closed. This wastes resources, as recommendations may become obsolete before action is taken. This is consistent with the former Inspector-General’s observation that the department is not agile enough to adapt to evolving needs (IGB 2021a).

2.3 Governance

Since the establishment of the Interim Inspector-General of Biosecurity (IIGB) position in July 2009, a number of different teams across the department have handled findings and recommendations published in independent internal and external scrutineers’ reports (including Inspector-General reports).

2.3.1 Corporate secretariat

Since the establishment of the IIGB position in 2009 and up until December 2022, the department’s corporate secretariat team within the then Governance Division managed Inspectors-General review recommendations. The secretariat managed Inspectors-General recommendations for enterprise-level reporting, including updates to Senate Estimates and the Audit and Risk Committee.

The secretariat continued to manage the Inspectors-General review recommendations until the Planning Hub – the information management system the department used to record and track progress in implementing the Inspector-General recommendations (discussed in detail in section 2.4.2) – was decommissioned in December 2022.

2.3.2 Internal Audit team

The Internal Audit team within the Office of the People, Property and Security Division’s, Integrity and Assurance Branch manages the findings and recommendations published in ANAO performance audit reports and the department’s internal audit reports. The team manually enters these in an Excel™ spreadsheet and stores records in the Parliamentary Document Management System (PDMS).

The team has the primary responsibility for managing all recommendations published in the ANAO audit reports across the portfolio. On a quarterly basis, it presents a list of all open recommendations to the Internal Audit subcommittee, which reports to the Audit and Risk Committee.

Before Planning Hub was decommissioned, the Internal Audit team appeared to have created records of all open Inspectors-General recommendations in PDMS in an attempt to prevent the loss of information. Considering the evidence for closure that relevant divisions provided, some of these recommendations were closed off in PDMS in the following year on an ad-hoc basis. The Internal Audit team was not responsible for reviewing or verifying the evidence provided for recommendations that were closed.

2.3.3 Biosecurity Policy and Assurance team

Following the decommissioning of Planning Hub, in March 2024, the then Biosecurity and Compliance Board endorsed the Biosecurity Strategy and Reform Division to manage implementation and reporting on Inspectors-General recommendations as an interim function until a department-wide enterprise system was established.

Since March 2024, the Biosecurity Policy and Assurance team within the Biosecurity Strategy and Reform Division has continued to provide overarching governance. Its responsibilities include allocation of Inspectors-General recommendations to relevant areas within the Biosecurity Group and seeking regular updates on the progress made. This includes reviewing the evidence presented when closing recommendations to ensure adequate decision-making.

2.4 Information management systems

Since the recording of Inspector-General recommendations began in 2010, the department has mainly used 3 different IT systems to catalogue and track the progress of recommendations:

1. eTrac (between 2010 and 2017–18)
2. Planning Hub Governance module (between 2018 and 2022)
3. PDMS (January 2023 to date)
4. Excel™ spreadsheets.

2.4.1 eTrac

In 2010 the department started using eTrac for handling (decision and action tracking) of IIGB recommendations. It was developed on behalf of the department's Executive Management Committee to ensure that high-level actions and decisions were captured transparently and accountably. However, it was unintuitive, had limited features and was cumbersome to use. Administrative access to eTrac was tightly restricted to authorised officers, and once a record was created in eTrac it could not be deleted.

Between October 2014 and March 2017, the IIGB was co-located with the departmental Internal Audit team. The Internal Audit team had responsibility for recording and monitoring decisions and actions on audit recommendations. After the Inspector-General role was established in mid-2016, the Inspector-General unit took on this responsibility because of its greater independence from the department. The process for capturing and reviewing information on decisions and actions on audit recommendations changed, leading to some confusion and potential for gaps or duplication and inefficiency (IGB 2018).

A wide range of departmental staff across business areas were responsible for ensuring that the department took follow-up actions on Inspector-General recommendations and that these actions were recorded in eTRAC. Poor governance on the part of the department resulted in lack of clarity about which divisions, branches and positions were responsible for implementing recommendations and recording actions in eTRAC. This was exacerbated by departmental restructures and staff changes during the time Inspector-General reviews had been conducted. Consequently, some corporate knowledge and responsibility for implementing recommendations was lost (IGB 2018).

Inspectors-General and departmental staff considered recommendations individually rather than by review, so some staff had limited understanding of how individual actions contributed to overall biosecurity outcomes in particular areas. For this review, the department remedied this to some extent by assigning each Inspector-General review to a single 'risk owner' for compilation of all responses (IGB 2018).

2.4.2 Planning Hub

In 2018, the Planning Hub (a custom-made governance module) replaced eTrac as the department allocated special funding for the development of Planning Hub by an external provider. Planning Hub encompassed 7 interlinking modules that covered business planning, risk planning and management, and project planning and reporting. Planning Hub enabled the department to track and progress actions and decisions arising from committees and governance boards, actions taken by the relevant executives and approvals needed for the closure of recommendations. It was expected to strengthen the department's governance and performance oversight by managing an inventory of a range of recommendations (including Inspectors-General recommendations) across department's portfolios. However, following his consultation with biosecurity division executive managers, the former Inspector-General reported (IGB 2021a) the following findings specific to the Planning Hub:

Planning Hub does not satisfactorily support the department's governance processes for implementing Inspector-General recommendations. It is difficult for the department's biosecurity executive and responsible staff to manage, monitor and report on the implementation of recommendations in Planning Hub.

Not all staff are recording progress on implementation in Planning Hub. Some biosecurity divisions are using a separate spreadsheet to manage implementation of recommendations.

In Planning Hub, recommendations are listed as either 'open' or 'closed'. From a project management perspective, it might be useful to create an 'in progress' status (Table 3 in IGB 2021a, p 17).

The Inspector-General noted that, due to discontinuation of funding, the Planning Hub was decommissioned in December 2022.

2.4.3 Parliamentary Document Management System

PDMS, which is maintained by the Commonwealth Department of Education, is used across government. It provides necessary security to store, process and control ministerial, parliamentary and executive documents. After Planning Hub was decommissioned, the department created records of recommendations and their closure in PDMS. The input, handling and closure of new recommendations in PDMS is now done by the Biosecurity Policy and Assurance team.

2.4.4 Excel™ spreadsheets

The Biosecurity Policy and Assurance section has created and manages an Excel™ document for tracking the status and closure of Inspector-General recommendations. This was intended to be an interim solution to track the status of Inspector-General recommendations until an enterprise-wide solution could be created. The system also tracks the sign-off on closure reports and location of files in Content Manager (the department's electronic document and records management system). This is beneficial, although it is limited by the loss of information when past systems have been decommissioned.

While it is good that an interim measure has been adopted, it is concerning that the department has not yet procured a permanent systems solution. The use of Excel™ spreadsheets to track recommendations is primitive, duplicative, resource intensive and prone to human error. The current system does not promote progress in implementing recommendation or the real-time monitoring and tracking of progress made.

2.5 Closing the gaps: why a centralised case management system is critical

The department currently lacks a dedicated, integrated information management system to support the effective handling of findings and recommendations from independent reviews and audits, including those conducted by the Inspector-General, the ANAO and the department's Internal Audit team. Therefore, information storage is fragmented across multiple teams and systems, leading to manual, time-consuming processes for tracking, prioritising and reporting on recommendations. The absence of a centralised system undermines the department's ability to meet its governance, regulatory and administrative obligations efficiently.

A workflow-enabled, auditable case management system is required to address these challenges. The system should integrate with existing enterprise platforms and provide robust reporting capabilities. This type of system will enable the department to consolidate review and audit findings, assign clear ownership, prioritise actions based on risk and monitor progress in real time. This capability will support improved decision-making, enhance transparency and reduce the risk of repeated issues and compliance failures.

The Inspector-General has highlighted several systemic issues stemming from the lack of an integrated system:

- *Fragmented information management:* Findings are stored in separate systems or spreadsheets, making it difficult to identify and act on critical issues.
- *Poor prioritisation and resource allocation:* Without a unified view, high-risk recommendations may be overlooked or delayed.
- *Inconsistent tracking and monitoring:* Manual processes lead to missed follow-ups and findings being repeated in subsequent reviews.
- *Lack of accountability:* Dispersed data makes it difficult to assign and track ownership of recommendations.
- *Reduced transparency and reporting difficulties:* Senior management lacks access to real-time, consolidated reporting, impacting oversight and responsiveness.
- *Inefficient communication and collaboration:* Teams operate in silos, delaying implementation of recommendations that require cross-functional coordination.
- *Increased risk of compliance failures:* Inability to track and act on findings may result in breaches of regulatory obligations.
- *Limited trend analysis and organisational learning:* Without integrated data, recurring issues and opportunities for improvement are not easily identified.
- *High administrative burden:* Manual tracking and reporting consume significant staff time and increase the risk of human error.

A centralised case management system would strengthen the department's review and audit response capability, improve operational efficiency and support a culture of continuous improvement. It would also enhance the department's ability to meet external scrutiny and regulatory expectations, particularly in the biosecurity domain, where risks are high and public confidence is critical.

2.6 Delayed procurement of recommendation management system

In February 2025, the Inspector-General noted that the department's Internal Audit team had developed a business case to procure a department-wide system for the management of findings and recommendations. The business case was developed to procure a dedicated IT system that can integrate essential information for capturing, reviewing, prioritising, tracking and reporting mainly ANAO and Internal Audit findings and recommendations. The business case highlighted functionalities that would enable the Internal Audit team to:

- be a certified records management system
- store the full audit/review/verification/assurance report
- capture and store audit/review/verification/assurance findings and recommendations through a work-flowed case management system
- capture decisions relating to the management of findings and recommendations
- upload supporting documents
- assess commonality (via reports) across findings and recommendations
- allocate both findings and recommendations for actioning, track actions
- have an automated and streamlined workflow for the governance, management and reporting of progress on findings and recommendations through to resolution
- request status updates from owners of findings and recommendations

- deliver a documented audit trail of the governance, management and reporting
- create customisable reporting dashboards that provide senior executives with visibility on the status and progress of findings and recommendations
- report on any field within the system and the ability to extract data and report through PowerBI™.

The Inspector-General concurs with this proposal, as these functionalities for managing findings and recommendations published in Internal Audit and ANAO audit reports are equally and entirely useful for managing Inspectors-General findings and recommendations. The Inspector-General notes that the Biosecurity Strategy and Reform Division is aware of this business case and has engaged with the Internal Audit team on the Audit and Recommendation Management System (ARMS). However, the Inspector-General is not aware of the outcome of that engagement.

Furthermore, the Inspector-General acknowledges that the main requirements for effective management of recommendations, regardless of their source, are consistent:

- **Centralised record-keeping:** A certified records management system to store all relevant reports, findings and recommendations.
- **Workflow case management:** The ability to capture, track and manage the lifecycle of findings and recommendations from identification to resolution.
- **Accountability and tracking:** The availability of features for assigning actions, tracking progress, requesting updates and documenting the audit trail of governance.
- **Decision capture:** The ability to record decisions about the management of findings and recommendations.
- **Supporting documentation:** The ability to upload relevant evidence and documents.
- **Reporting and analysis:** Customisable dashboards, commonality assessment and data extraction for senior executive visibility and continuous improvement.

Given that the previous issues with eTrac and Planning Hub directly impacted the management of Inspectors-General recommendations, a system with these capabilities would significantly improve the department's ability to:

- **prevent loss of Inspector-General-specific corporate knowledge** through a certified records management system and storing full reports and supporting documents through clear allocation of actions, tracking and documented audit trails
- **provide senior executives with visibility** via customisable reporting dashboards on the status and progress of Inspector-General recommendations
- **identify commonality across all recommendations**, as this could reveal overarching themes in biosecurity risks or departmental weaknesses, regardless of whether the finding came from Internal Audit, ANAO or the Inspector-General.

The Inspector-General is not aware of the stage of procurement for this business system and recommends that the department, as a priority, procure one (Recommendation 1). Evidently, this is consistent with 2023 Australian Public Service Commission review of the department's capability, which was part of a whole-of-government [Capability Review program](#). The [Capability Review report](#) highlighted several areas of improvement, of which governance is one. The department immediately prioritised implementing recommendations in the Capability Review report and established the [Transformation Program](#), thereby committing itself to enhancing its governance system. One specific 'Action item' the department planned to complete to enhance its governance arrangements is the creation of a system to track and record audit recommendations:

Establish an integrated system to track and record recommendations from audits, assurance activities, and independent reviews to enable more efficient, effective, and transparent approach to prioritise and implement improvements to organisational capability.

Recommendation 1

The department should urgently procure and implement a single, integrated and certified enterprise-grade Audit and Recommendation Management System (aka ARMS) that is specifically designed to centralise, track and manage all findings and recommendations, irrespective of their originating body (Internal Audit, ANAO, Inspector-General of Biosecurity or external reviewers). This system must incorporate robust data management and migration capabilities to ensure the enduring preservation and accessibility of historical information, even during system upgrades, decommissioning and machinery of government changes.

Department's response: The department notes the recommendation.

The department continues to improve our governance system and enterprise performance and reporting as part of implementing the Transformation Action Plan. As part of this, the department is investigating an integrated system to track and manage recommendations from audits, assurance activities, and independent reviews. This will enable the most efficient, effective, and transparent approach to prioritise and implement improvements to organisational capability.

The department is currently evaluating the most suitable approach to identify and implement an integrated system, subject to funding availability. This system will meet data management and retention policies to ensure continuity of historical information.

2.7 Records management

The Inspector-General noted that, before the Planning Hub was decommissioned, information relevant to a number of Inspector-General recommendations was not backed up appropriately and has been lost. This is because full records of recommendations with the trail of decision-making by executives and other staff cannot be retrieved from the 'backup dump' taken at the time. The same thing happened previously, when the department decommissioned eTrac and adopted Planning Hub as its primary repository to track and manage Inspector-General recommendations. This loss of information negatively affects the department and gives rise to the risks discussed below.

2.7.1 Loss of corporate knowledge and accountability

The most immediate and significant impact is the loss of crucial corporate knowledge. In the case of the Planning Hub, the detailed trail of decision-making by executives and other staff, along with the progress on implementing recommendations, is irretrievable. This directly undermines accountability for past actions and decisions.

2.7.2 Inability to track and verify implementation of recommendations

The Planning Hub was designed to track the progress of recommendations and the actions taken. Without proper backups, it becomes impossible to find out whether recommendations were fully implemented, who was responsible and what steps were taken.

2.7.3 Compromised governance and performance oversight

The Planning Hub's purpose was to strengthen governance and performance oversight by managing an inventory of recommendations. The loss of this data means the department's ability to effectively oversee its operations and ensure compliance with recommendations is severely hampered.

2.7.4 Difficulty in learning from past experiences

Without a complete record of decisions, actions and outcomes, the department loses the opportunity to learn from past successes and failures related to implementation of recommendations. This can lead to a repetition of mistakes or inefficiencies.

2.7.5 Increased risk and potential for noncompliance

For critical areas like biosecurity in particular (as indicated by the Inspector-General recommendations), the inability to access past information on how risks were addressed or recommendations implemented can increase future risks and potentially lead to noncompliance with regulatory requirements.

2.7.6 Erosion of trust and transparency

When information about crucial actions and decisions is lost, it can erode trust, both within the department and externally with oversight bodies (like the Inspector-General) and the public. Transparency is compromised if there is no verifiable record of past activities.

2.7.7 Challenges for future audits and reviews

Future audits and reviews will face significant challenges in assessing the department's past performance and compliance if the underlying data are missing. This could lead to more intense scrutiny by the Inspector-General and/or external reviewers (such as the ANAO).

This is concerning to the Inspector-General. The Inspector-General recommends that the department, as a priority, strengthen governance of Inspector-General recommendations. This should include development of a functional framework and a policy to ensure preservation of all critical information when systems are decommissioned or replaced (Recommendation 2).

Recommendation 2

The department should develop and implement a comprehensive data migration and retention framework including mandatory protocols for robust data backup, validation and transfer, to ensure the continuous and accessible preservation of all critical historical information when systems are decommissioned or replaced, or when the departmental responsibilities shift due to machinery of government changes.

Department's response: The department notes the recommendation.

Further to the response to recommendation 1, the department is committed to ensuring that information and records meet legislative requirements, relevant international standards, and guidance from the National Archives of Australia. The department's information governance framework provides record-keeping policies, procedures and training for all persons engaged in a business undertaking with the department.

The department will develop a records and information management plan for recommendations management. A decommissioned systems archival framework, supported by a digital archival solution, are deliverables of the Capital Security, Technology and Asset Refresh project which is underway. The project's objective is to establish a clear, information-centric process for managing and governing structured and unstructured data from decommissioned department IT systems throughout their archiving and disposal phases.

3 Coordination challenges, misaligned priorities and fragmented accountability

3.1 Previous insights and perspectives

The Inspector-General plays a crucial role in scrutinising the nation's biosecurity system and making recommendations for improvement. However, a recurring theme in various reports is the persistent failure to fully and effectively implement these recommendations. This could potentially have significant consequences for Australia's biosecurity resilience.

This document marks the sixth review that has assessed the department's performance in implementing Inspectors-General recommendations ([Table 3](#)). This repeated necessity for oversight that underscores persistent systemic issues led the former Inspector-General to observe:

None of these reviews would have been necessary if the department had a well-established commitment to and a sound process for continuous improvement; and appropriate accountability mechanisms within biosecurity divisions and the department more broadly (IGB 2021a, p 1).

The former Inspector-General elaborated on the root cause of the problem, noting the department's failure to grasp the essence of the independent role:

The department has struggled to come to an appropriate understanding of the independent Inspector-General role. It has therefore not capitalised on the benefits of the independent assessments that the Inspector-General provides. It appears that the department has approached Inspector-General recommendations as an administrative, rather than transformative, process and not treated them with the level of importance that seemed to be envisaged by the Australian Parliament when it established the statutory role in the *Biosecurity Act 2015* (IGB 2021a, p. 1).

The Inspector-General has noted that these types of frustrations that result from the department's lack of timely and efficient implementation of review recommendations are not only limited to the Inspectors-General. For example, the Australian Dairy Farmers' submission to the Senate inquiry (Australian Dairy Farmers 2022) shows that the department's stakeholders are equally concerned.

In the past the department has had a tendency to treat Inspectors-General recommendations as administrative tasks rather than critical drivers of transformative change. This is of concern, as it could potentially lead to greater biosecurity risks (IGB 2021a). The following observations paint a picture of a department with a control environment that is too weak to act on review findings. It suggests a culture where recommendations are not fully embraced as opportunities for improvement but, rather, are seen as administrative burdens to be managed with minimal rigour. As discussed below, the ongoing lack of oversight, accountability, transparency and effective follow-through are deeply concerning.

- *Lack of prioritisation and oversight:* Inspector-General recommendations are not treated with the same importance as other assurance activities. There is no central body tracking their progress, leading to a fragmented and uncoordinated approach.
- *Siloed decision-making and communication gaps:* Signs of siloed decision-making and communication gaps are reflected in ambiguous accountability, fragmented tools (PDMS/spreadsheets), delayed implementation and a reactive compliance culture – leading to unresolved risks and compounding issues over time.
- *Poor risk management:* The department has not considered the potential system-wide risks when setting deadlines for implementing recommendations. This suggests a reactive approach rather than a proactive one focused on mitigating broader issues.
- *Poor accountability for overdue actions:* Instead of escalating overdue actions to the Audit and Risk Committee, the department simply extends deadlines. This completely undermines accountability and allows issues to linger.

- *Ineffective records management*: There is little evidence of proper record-keeping for the implementation and closure of recommendations, making it nearly impossible to track progress or verify completion.
- *Lack of verification of effectiveness*: The department lacks a formal process to reveal whether implemented recommendations have actually been effective, even after they are closed. This is a critical gap, as it means issues could persist despite actions being taken. This also ties into the [APSC Capability Review findings](#), indicating a recurring problem with monitoring and evaluation.
- *Ambiguity in 'agreed in principle'*: The term 'agreed in principle' lacks clarity, creating uncertainty around the department's actual commitment to these recommendations.
- *Absence of implementation plans*: The department often jumps into implementing actions without developing a clear plan, leading to significant confusion among staff handling or progressing the recommendations as well as delays and inefficiencies.
- *Lack of transparency*: Progress on recommendations is not published or shared with the Inspector-General, which hinders independent oversight and accountability.
- *Premature closure of recommendations*: Recommendations are being marked as 'closed' based on planned actions rather than actual, verified implementation. This is a critical red flag, suggesting a focus on checking boxes rather than solving problems.
- *Outdated status tracking*: Long delays in updating the status of recommendations make it difficult to get an accurate picture of their overall progress.

As noted in Chapter 2, there are multiple teams across the department managing recommendations published in reports by internal and external scrutineers. There is enough evidence to support the claim that, when multiple teams across an organisation are responsible for handling recommendations published in independent review and audit reports, inefficiency often arises due to coordination challenges, misaligned priorities and fragmented accountability. This potentially poses several risks for the organisation, ranging from operational inefficiencies to strategic missteps.

These types of concerns have been consistently reported in previous reviews and audits published by the Inspectors-General (IGB 2018, IGB 2021a) and ANAO (ANAO 2014), respectively. For example, the Australian National Audit Office (ANAO) is Australia's lead audit agency, providing a full range of audit and assurance services to the Parliament and Commonwealth public sector entities to improve public sector performance and accountability. When assessing the effectiveness of the then Department of Health (now Department of Health, Disability and Ageing) monitoring and implementation of both ANAO performance audit and internal audit recommendations (ANAO 2014), the ANAO made the following observations:

The rate of early closure in the ANAO's sample highlights the risk of closing recommendations without appropriate assurance (ANAO 2014, p 39).

The ANAO identified a number of audit recommendations that have not been adequately implemented despite being closed in the department's monitoring system (ANAO 2014, p 43).

To avoid the risk of closing recommendations prematurely, the department should seek appropriate assurance and sign-off from responsible Divisions, and in the case of significant recommendations, consider the benefit of sign-off at the Deputy Secretary level (ANAO 2014, p 16).

Similarly, an effective recommendation tracking system is not just an administrative tool; it is a strategic governance mechanism that translates insights into action, manages risk, upholds accountability and ensures that an entity continually improves its operations and achieves its objectives. For example, the ANAO (ANAO 2021) also emphasised the need to have appropriate enterprise systems in place for monitoring and tracking the implementation of recommendations:

Systems should be fit for-purpose, reflecting the size of the entity, the nature of its business and its governance structure. Entities should ensure there are sufficient controls in the system to maintain complete and accurate data. Effective monitoring requires an approach that accurately tracks progress and records the actions of the business area or individual responsible for implementation. The goal is that those with entity accountability can have a clear line of sight to the implementation of agreed recommendations.

3.2 Governance gaps undermining timely implementation of recommendations

Since the establishment of the statutory position of the Inspector-General in July 2016, the department's governance arrangements for performance monitoring and reporting arrangements and how they relate to the accountable implementation of the Inspectors-General recommendations have been unclear.

Stakeholders across the agricultural, biosecurity and logistics sectors have consistently expressed dissatisfaction with the department's failure to act promptly on Inspectors-General recommendations:

While we note governments' agreement to the majority of recommendations, there is already a mounting pile of biosecurity reviews and reports gathering dust from past IGAB reviews to findings of the Inspector-General of Biosecurity (The National Farmers Federation 2025).

Since the position of the Inspector General was formally established under the Act, a total of 17 reviews have been published where the department has received 216 recommendations. As at 1 July 2022, 82 recommendations remain open and in progress by the department (Shipping Australia 2022).

... recent changes in departmental leadership and management have seen a far more concerted effort to respond to Inspector-General of Biosecurity reviews. While these efforts are welcomed by ADF it is not a satisfactory model to rely on staff and culture to determine the level of responsiveness to IGB reviews. Limitations and deficiencies in the Biosecurity Act 2015 need to be addressed to secure a guaranteed (legislative) commitment to continuous improvement (Australian Dairy Farmers 2022).

These concerns highlight a growing perception that systemic governance weaknesses and a compliance-driven culture are undermining Australia's biosecurity resilience. Several specific examples noted below provide sufficient evidence for the department to take action and fix the ongoing systemic issues that consistently arise. For example, the former Interim Inspector-General of Biosecurity (IIGB 2015) noted:

... effective implementation of IIGB audit recommendations requires strong management oversight and monitoring, together with clear responsibilities and timely actions.

Similarly, the former Inspector-General also aptly captured and highlighted the department's poor governance for large number of open recommendations:

... endemic weaknesses in governance within corporate areas and biosecurity divisions has led to confusion, poor accountability and inefficiency in the handling of advice to the Director of Biosecurity on Inspectors-General recommendations, and lack of accountable and timely implementation of responses to recommendations (IGB 2021a).

Specifically targeting the ongoing poor governance, the former Inspector-General made the following 3 recommendations in one review alone (IGB 2021a):

[Recommendation 2] The department should strengthen governance arrangements that clearly outline the department's accountability arrangements to implement Inspector-General of Biosecurity review recommendations, as part of normal department governance and accountability, and commitment to continuous improvement.

[Recommendation 6] Monitoring and progress reporting against Inspector-General review recommendations should be routinely done, including reporting to the Portfolio Audit Committee and public annual reporting, in order to maintain strong governance processes that provide the Director of Biosecurity with clear line of sight.

[Recommendation 9] The department needs to determine how coordinated oversight of implementation of the Inspector-General recommendations by the Biosecurity and Compliance Board will integrate with the department's overall governance arrangements, including the executive management and corporate governance areas. The board's terms of reference should be amended to include this responsibility and the board's accountability to the Director of Biosecurity.

The Inspector-General notes that the ANAO has also emphasised the need for good governance in order to successfully implement recommendations (ANAO 2017):

Successful implementation of recommendations requires an adequate level of senior management oversight and implementation planning to set clear responsibilities and timeframes for addressing the required actions. Implementation should involve key stakeholders. Audit committees, through their position in an entity's governance framework, also have an important role in monitoring and assuring the implementation of recommendations (ANAO 2017, p 13).

In spite of several specific recommendations and findings in 3 reviews (IGB 2018, IGB 2019 and IGB 2021a) by 2 former Inspectors-General to improve governance, the department has failed to improve its processes for implementing recommendations.

3.3 A deficient recommendation implementation mechanism

The number of recommendations pending implementation ([Table 3](#)) suggests a deficient recommendation implementation mechanism within the department, characterised by a lack of prioritisation, chronic delays and a reactive approach to closures. A breakdown of the core issues highlighting the ongoing poor governance is presented in the following section. The Inspector-General's observations are similar to those reported by former Inspectors-General.

3.3.1 Lack of prioritisation

Despite making steady progress, the department is not prioritising implementation efforts. This means recommendations, even urgent and high-priority ones, languish. This is a critical failure, as it directly impacts the department's ability to address identified issues in a timely and effective manner. This is consistent with the former Inspector-General's observation (IGB 2021a):

The department has not had a consistent project management and continuous improvement approach. As a result, the department does not currently apply a consistent project planning, delivery and monitoring approach for Inspector-General recommendations. This deficiency was highlighted by both Inspector-General reviews (Recommendation 5 in IGB 2020 and Recommendation 17 in IGB 2021b).

3.3.2 Due date revision and shifting priorities

Due dates are frequently revised because of shifting priorities, dependencies and funding issues. This highlights a fundamental problem with planning and resource allocation. It also indicates a lack of stable strategic direction and insufficient capacity to manage competing demands, leading to a constant reprioritisation that undermines consistent progress. There is sufficient evidence to back this assertion (IGB 2018, IGB 2021b).

3.3.3 Failure to address urgent matters

The fact that some recommendations that remain open were highlighted as urgent and high priority by the original reviews is particularly alarming (IGB 2021a). This directly contradicts the purpose of recommendations and suggests a significant disconnect between identified critical needs and the department's operational priorities. Therefore, the Inspector-General recommends that, when recommendations are pending for extended period of time, the department, in collaboration with the Inspector-General, conduct a thorough reassessment of associated risks to ensure the recommendations remain valid and that their implementation is strategically targeted for maximum effectiveness (Recommendation 3).

Recommendation 3

When the implementation of a recommendation faces extensions or delays, the department, in collaboration with the Inspector-General, should conduct a thorough re-assessment of associated risks and the urgency of timely action. This process will ensure the recommendation remains valid and that its implementation is strategically targeted for maximum effectiveness.

Department's response: The department agrees with the recommendation.

The department is committed to ongoing collaboration with the incoming IGB, including on approaches to the assessment of risks and urgency, to ensure the effectiveness and expediency of implementation of accepted IGB recommendations.

As you are aware, the department has recently established a refreshed governance framework for IGB recommendation management. The department is committed to ongoing improvement, and to continuing to refine its approach to IGB recommendation governance.

As part of the revised governance framework, the Biosecurity Operations and Compliance Group (BOCG) has established a Senior Executive Service level 2 Risk Management and Performance Reporting Working Group reporting to the BOCG Strategic Executive Forum to provide risk-based oversight of recommendations. As part of this oversight function, the department will monitor delayed implementation and associated risks to identify clear remedial actions and prioritisation of efforts needed. Reporting to the department's Audit and Risk Committee and Executive Board, as required, will also be part of this oversight. This will ensure transparency and accountability.

The department welcomes engagement with the IGB, as appropriate, as part of this re-assessment process.

These observations are still relevant today, 4 years since the former Inspector-General published his review (IGB 2021a) on this topic. The former Inspector-General aptly highlighted an ongoing flaw in the department's governance of recommendations and specifically noted:

The department has struggled to come to an appropriate understanding of the independent Inspector-General role. It has therefore not capitalised on the benefits of the independent assessments that the Inspector-General provides. It appears that the department has approached Inspector-General recommendations as an administrative, rather than transformative, process and not treated them with the level of importance that seemed to be envisaged by the Australian Parliament when it established the statutory role in the Biosecurity Act 2015 (IGB 2021a, p 1).

To improve management of implementation, oversight of Inspector-General recommendations must be integrated into the department's existing governance processes. Managers and staff who are responsible for implementing recommendations must provide assurance that recommendations are closed only after they have been implemented, the issues identified in the review have been addressed and evidence of the implementation has been provided to the responsible First Assistant Secretary (IGB 2021a, p 10).

3.4 Suggested improvements to governance

The Inspector-General emphasises that an increasing number of open recommendations, coupled with additional insights (see Chapters 2–4), reveals a department that is struggling to effectively implement necessary changes, bogged down by internal delays and primarily motivated by external scrutiny rather than internal improvement. This situation often leads to unresolved risks, missed opportunities and a continuous cycle of issues compounding over time. To resolve these issues, it is recommended that the department:

- take a deeper dive into the reasons why recommendations become difficult to implement to address underlying systemic issues rather than finding workarounds
- genuinely commit itself and department's executive to putting in sustained effort to move beyond a reactive, compliance-driven mindset

- effectively collaborate and consult with the Inspector-General to ensure transparency and the integrity of the closure process.

An uplift in governance is essential to ensure recommendations are actively tracked, transparently reported and strategically embedded into operational planning. After the decommissioning of Planning Hub, the Biosecurity Policy and Assurance team assumed overarching governance responsibilities for managing Inspectors-General recommendations. However, despite this shift, governance arrangements remained largely dormant until May 2025, with limited evidence of structured implementation. The Inspector-General noted that, from May 2025 onwards, the department started including an agenda item on Inspectors-General recommendations for the Strategic Executive Forum (see Chapter 4).

3.4.1 Proactive Inspector-General consultation with the executives

In April 2025, the Inspector-General provided critical feedback to senior executives (SES Band 1 and Band 2) within the Biosecurity Strategy and Reform Division, recommending the following measures to strengthen and streamline governance processes.

Establish an efficient governance framework

A documented framework should be developed as a priority to manage all open recommendations. This framework should cover allocation, progress tracking and implementation, and clearly define roles and responsibilities. Its purpose is to:

- eliminate confusion about accountability
- provide visibility and oversight for executives
- support informed decision-making
- enable real-time progress monitoring and reporting to executives and the Inspector-General.

The Inspector-General also recommended that implementation of biosecurity-related recommendations (not limited to IGB reviews) be a standing item on the Biosecurity Operations and Compliance Group Executive agenda.

Develop a comprehensive policy

The department should implement a comprehensive policy dedicated to the end-to-end management of Inspector-General recommendations. A dedicated policy is required, as none currently exists. This policy is crucial, as it will help the department:

- set the strategic direction and workflow
- support consistent decision-making
- clarify roles and responsibilities of recommendation owners
- align with the governance framework outlined above.

Establish a risk management group

The department should create a risk management group, reporting to the Biosecurity Operations and Compliance Group Executive, to identify high-risk recommendations for prioritisation and expedite their implementation. The risk management group would also feed into the implementation planning process, helping to mitigate risks by supporting the initial stages of execution, especially for recommendations that may be challenging or time-consuming.

Develop and implement protocols and decision support tools

To address the ongoing delays in the implementation of recommendations, a clear protocol, and flowcharts and decision support materials, are needed to guide relevant personnel across the Biosecurity Group. These tools, updated as and when changes are made to governance processes, will serve as invaluable resource for the Biosecurity Group Executive, enabling:

- effective allocation of recommendations
- the ability to identify and resolve obstacles or bottlenecks
- the ability to make timely, evidence-based decisions.

Standardise reporting templates

To streamline the process and improve efficiency, the department should introduce a simple, one-page reporting template to capture actions taken and evidence provided for closing recommendations. This template will allow executives (and the Inspector-General) to rapidly assess whether:

- a recommendation is satisfactorily closed
- further work is required
- reassessment (in consultation with the Inspector-General) is necessary.

The Audit and Risk Committee

To enhance transparency and accountability, the department needs to institute an ongoing agenda for detailed reporting to the Audit and Risk Committee in all its meetings throughout the year. It is recommended that, beyond simply reporting the number of open, closed or pending recommendations, these reports provide comprehensive rationale for the status of each recommendation (notably, key risks and mitigation strategies) aligning with best practices for robust governance and oversight.

For example, ANAO emphasised the role an agency's audit committee could play in the successful implementation of recommendations (ANAO 2017):

Successful implementation of recommendations requires an adequate level of senior management oversight and implementation planning to set clear responsibilities and timeframes for addressing the required actions. Implementation should involve key stakeholders. Audit committees, through their position in an entity's governance framework, also have an important role in monitoring and assuring the implementation of recommendations (ANAO 2017, p 13).

Provide regular updates to the Inspector-General

Currently, there is no formal process for providing the Inspector-General with regular updates on the implementation of recommendations. Updates are provided to the Inspector-General when requested. The Inspector-General should be given updates on progress, ideally on a quarterly basis, that detail the progress made in closing open recommendations. The updates should include evidence used in closing recommendations to ensure full transparency and accountability.

Consult with the Inspector-General

The Inspector-General is open to consultation on challenging recommendations. Seeking the Inspector-General's guidance, when necessary, will help resolve longstanding issues and enable timely closure of recommendations (Recommendation 4). This collaborative engagement will be invaluable in effectively closing recommendations that have remained open for extended periods.

Recommendation 4

The department should continue its collaboration with the Inspector-General of Biosecurity in reassessing open recommendations for their currency and its ability to progress implementation.

Department's response: The department agrees with the recommendation.

As part of the department's refreshed governance framework for IGB recommendation management, the department is embedding a risk-based approach to ensure a coordinated, holistic and thematic approach to recommendation implementation and closure. Specifically, the department is conducting a thematic review to ensure timely closure of outstanding and open IGB recommendations. This review is being completed against clear principles and risk ratings (i.e. practicality of implementation, validity of the recommendation and whether the recommendation requires new funding). The department is keen to address the intent of the recommendations and address the risks identified. This review will be completed by end-2025.

The department recognises the importance of an ongoing collaborative partnership with the IGB to address key risks and opportunities to strengthen the department's biosecurity activities. We would welcome engagement with the IGB, where appropriate, to test long-standing recommendation validity, underlying risks, and any relevant risk mitigations.

4 Proposed governance arrangements

4.1 Good governance leads to better outcomes

There is a strong correlation between the governance arrangements established to oversee the implementation of recommendations and their successful implementation. This highlights a key principle in organisational effectiveness: 'good governance leads to better outcomes'. The Inspector-General notes that the benefits of good governance are varied.

4.1.1 Accountability and ownership

Effective governance structures ensure that there is clear accountability for the implementation of review/audit recommendations. Without dedicated oversight, recommendations may be ignored, missed, delayed or poorly executed. The department may receive multiple review/audit recommendations. However, without clear ownership or regular monitoring by a governance body, those recommendations may fail to be prioritised, tracked or acted upon properly, leading to incomplete or delayed implementation.

4.1.2 Resource allocation

Proper governance ensures that sufficient resources (time, personnel, budget) are allocated to implement recommendations. Without governance oversight, necessary resources may not be provided, which directly hinders successful implementation. In organisations lacking governance arrangements, critical review or audit findings may not receive adequate attention or financial support, leading to ineffective or half-hearted implementation of recommendations that does not address the root issues.

4.1.3 Transparency and communication

Effective governance facilitates transparency in the implementation process and fosters communication between departments. This transparency ensures that progress is tracked, challenges are addressed and success is measured. Where there is strong governance, the implementation of recommendations is likely to be more aligned and informed. In contrast, without proper governance structure in place, the department might unknowingly duplicate efforts or, worse, fail to address findings that overlap in scope.

The Inspector-General acknowledges that the department's arrangements for internal monitoring of the implementation of its review recommendations were appropriate when Planning Hub was used and recommendations were managed by the corporate secretariat. Adequate support was also provided to the Audit and Risk Committee to conduct its monitoring and review function for recommendations.

4.1.4 Timeliness and follow-up

Strong governance structures provide the necessary oversight and follow-up mechanisms to ensure that recommendations are implemented on time. Without this structure, review recommendations can linger unaddressed, with deadlines missed or forgotten. A governance board can set deadlines, track progress and escalate unresolved issues, helping to ensure that recommendations are implemented within the agreed-upon timeframe. This is consistent with the Australian National Audit Office's (ANAO's) observation:

... recommendations can vary in scope and complexity, and as a consequence the implementation task may require coordination across a range of business areas within an entity. The risks involved and the time taken to implement recommendations within entities can also vary. If implementation is not progressed promptly, and individual risks remain untreated, the full value of the audit may not be achieved. In this context it is important that the entity's assurance function and the audit committee keep the accountable authority informed on progress with implementing recommendations that are complex, difficult or overdue (ANAO 2014, pp 39–40).

The Inspector-General concurs with the ANAO and acknowledges that circumstances can change over time. As a result, a recommendation that was critical 6 months ago may no longer be as urgent or may have become even more pressing. A reassessment would ensure the department is not acting on outdated assumptions. Similarly, delays can introduce new risks or exacerbate existing ones. A structured re-evaluation would help identify these and allows for mitigation strategies to be updated accordingly.

By reassessing, the department can ensure that resources are being directed to where they will have the most impact, rather than simply to a plan that may no longer be optimal. This process also supports good governance, as it shows that the department is actively managing its commitments and adapting to changing conditions, which can build trust with stakeholders.

4.1.5 Continuous improvement

Governance is not just about overseeing individual recommendations; it is also about fostering a culture of continuous improvement. Good governance helps organisations learn from past reviews and audits and adapt processes to prevent similar issues from arising in the future. A strong governance system would focus not only on implementing review recommendations but also on learning from them and establishing practices to improve overall operations, thus avoiding recurring issues.

4.1.6 Risk mitigation

Governance arrangements help mitigate the risk that recommendations will not be properly addressed, leading to unresolved issues that may escalate into larger problems. If governance structures are weak, recommendations may not be implemented, leaving the department exposed to risks such as compliance failures, security vulnerabilities or inefficiencies that could be costly over time. This report highlights that the department's current management of recommendations, relying on PDMS and spreadsheets, is inadequate and actively hinders effective implementation. To rectify this critical deficiency and empower staff, in April 2025, the Inspector-General provided critical feedback to senior executives (Senior Executive Service (SES) Band 1 and Band 2) within the Biosecurity Strategy and Reform Division to strengthen and streamline governance processes.

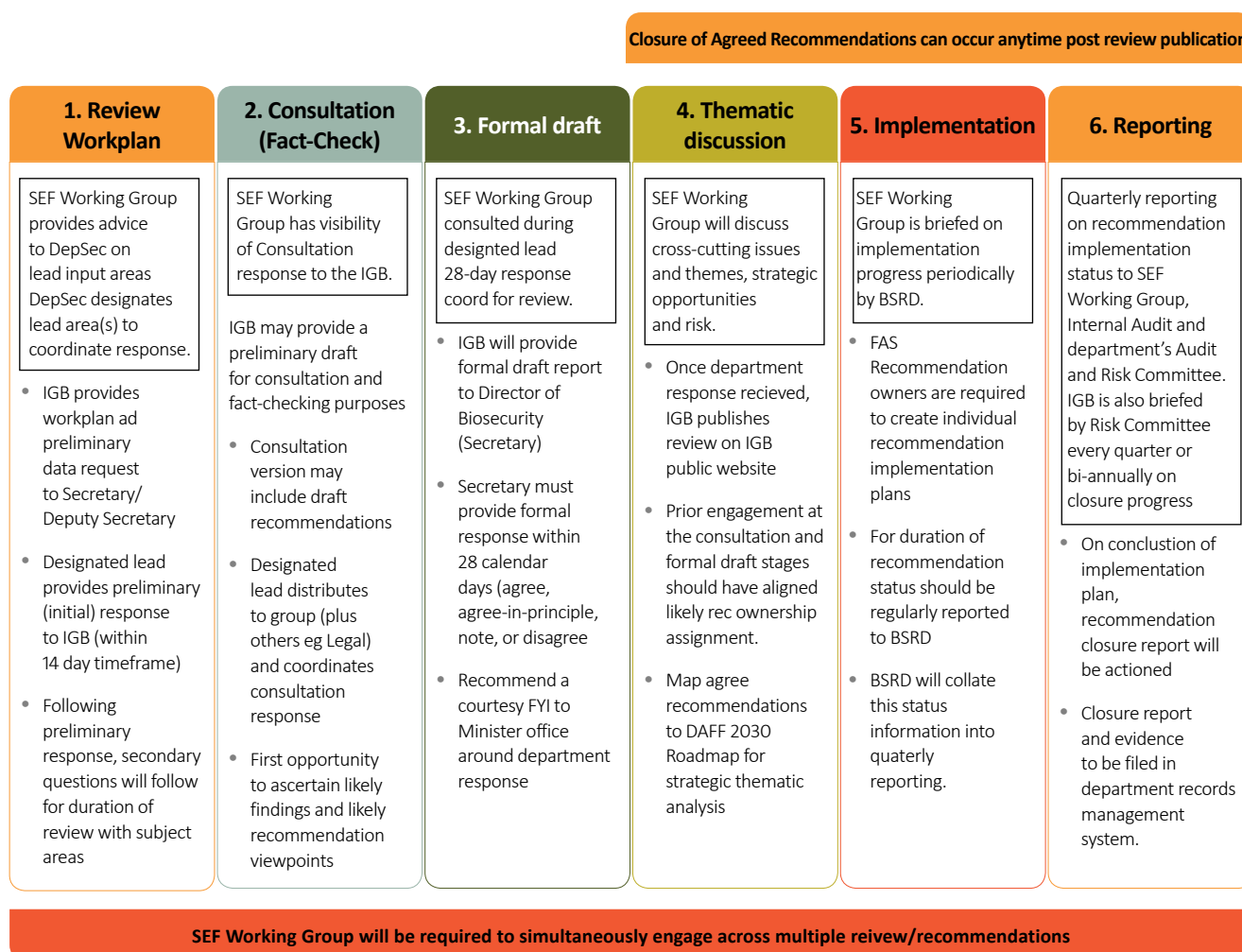
4.2 Assessment of the department's proposed governance framework

In August 2025, the Biosecurity Strategy and Reform Division executive provided the following set of renewed governance documents, including a step-by-step process for managing recommendations, to the Inspector-General:

1. High-level plan for governance and consolidation
2. Refreshed governance model
3. Governance for Risk Management and Performance Reporting Working Group and SEF
4. Recommendation closure template
5. Recommendation principles
6. Recommendation implementation plan template.

The proposed framework for the Inspector-General review governance covers the initial Inspector-General workplan through to the final closure of recommendations ([Figure 1](#)).

Figure 1 Governance overview for implementation of Inspector-General recommendations



Source: Department of Agriculture, Fisheries and Forestry

Summaries of all 6 governance documents the Inspector-General assessed are presented below.

4.2.1 Plan for governance and consolidation

The governance plan provides a strong strategic foundation and addresses many of the Inspector-General's concerns, such as accountability, risk-based prioritisation, and the need for clear roles and reporting. However, it is not yet sufficient as a standalone solution for the governance of Inspector-General recommendations. To be fully effective, supporting operational artefacts – a detailed governance framework, decision trees, tiered implementation and closure templates, standardised reporting packs and clear escalation protocols – must be developed and adopted. Without these, there is a risk that the governance arrangements will remain conceptual and not deliver the intended improvements in transparency, accountability and timely closure of recommendations.

4.2.2 Refreshed governance model

The paper outlines a refreshed, risk-based governance model for Inspectors-General recommendations, agreed in principle by Strategic Executive Forum (SEF). It positions the Risk Management and Performance Reporting Working Group to implement the model and provide regular progress updates and escalations to SEF. SEF retains high-level oversight and will conduct an annual deep-dive with the Inspector-General on progress, strategic risks and opportunities. The approach seeks to foster a collaborative partnership with the Inspector-General while preserving independence; and to lift departmental performance reporting by aligning oversight and implementation with the Biosecurity Risk Management Framework, clarifying accountability, and enabling single-source tracking and evidence-based closures.

The document also articulates closure principles, acknowledging that some recommendations may be impractical, outdated, unfunded or effectively continuous improvement. It warns that simple alignment to broader strategies is not a sufficient basis for closure. SEF may also provide the Director of Biosecurity with a status update once the model is functional. While compelling at the strategic level, the paper does not include the operational machinery – detailed decision rights, triage thresholds, templates, cadence and escalation mechanics – needed to ensure efficient day-to-day delivery and timely closure of recommendations.

4.2.3 Governance for Risk Management and Performance Reporting Working Group and SEF

The renewed governance framework ([Figure 1](#)) provides end-to-end management of all ‘open’ Inspectors-General recommendations. It also clarifies roles and responsibilities of areas across the Biosecurity Group, eliminating ambiguity in ownership and enhancing executive oversight. It appears to support effective decision-making, enable real-time tracking of progress and support comprehensive reporting to both executives and the Inspector-General.

The Inspector-General notes that it lacks the operational detail, decision rights and risk-based triage needed for robust and timely governance.

4.2.4 Recommendation closure template

While the closure template provides a solid foundation for documenting and approving the closure of Inspector-General recommendations, it lacks several critical elements needed for a robust, risk-based and auditable closure process. Specifically, it does not require explicit risk assessment, define closure criterion and provide for escalation, assurance or differentiated treatment based on risk or complexity. To ensure efficient and defensible closure of recommendations, the template should be enhanced with risk-based fields, clear evidence standards, escalation protocols and linkage to reporting and assurance processes.

4.2.5 Recommendation principles

The recommendation principles document captures thematic grouping, recommendation principles and closure outcomes sufficiently for the governance of Inspector-General recommendations at the policy and decision-making level, with clear principles and closure outcomes. It ensures that closure is evidence based and not simply justified by strategic alignment or difficulty. However, to be fully effective, these principles should be embedded into operational artefacts, such as implementation and closure templates, reporting packs and assurance protocols, to ensure consistent, auditable and risk-informed decision-making across the department.

4.2.6 Recommendation implementation plan template

The template is comprehensive and covers all major aspects needed for robust implementation planning and closure:

- *Risk-based approach*: Explicitly integrates risk assessment and mitigation.
- *Thematic alignment*: Ensures recommendations are mapped to strategic enablers.
- *Stakeholder engagement*: Identifies all relevant parties.
- *Evidence and assurance*: Requires documentation of evidence and formal closure attestation.
- *Variation management*: Provides for tracking changes in implementation strategy or ownership.

To further enhance efficiency and usability, the department should consider introducing a tiered approach, escalation protocols, assurance steps, reporting integration and digital enablement. These improvements, listed below, will help ensure the process is both robust and scalable across all types of recommendations:

- *Tiered approach*: Introduce a simplified version for low-risk or straightforward recommendations to avoid over-processing. The current template is detailed and may be excessive for minor items.
- *Escalation protocol*: Add a section for documenting unresolved issues, blockers and escalation pathways (such as when to refer to the Risk Management Working Group or SEF).
- *Assurance/validation*: Include a field for independent assurance or validation (for example, internal audit or peer review) before closure attestation, especially for high-risk or complex recommendations.
- *Reporting linkage*: Reference how implementation and closure status will be reported to governance bodies (SEF, Audit and Risk Committee, Inspector-General) and how this template integrates with quarterly reporting packs.
- *Lessons learned*: Add a section for capturing lessons learned or improvement opportunities identified during implementation, to inform future recommendations and governance processes.
- *Digital enablement*: Consider digitalising the template for easier tracking, analytics and integration with enterprise systems (for example, automated reminders, dashboards).

4.3 Current gaps, proposed enhancements and expected benefits

The department’s proposed governance framework provides a strong foundation for managing Inspector-General recommendations and reflects a positive shift towards risk-based oversight and improved accountability. To maximise its effectiveness, the framework should be supported by practical tools and processes that enable consistent, timely and auditable implementation. Key opportunities include introducing tiered templates for different risk levels, embedding clear escalation pathways, integrating reporting and assurance processes, and leveraging digital solutions for tracking and analytics ([Table 4](#)).

Table 4 Summary of current gaps, proposed enhancements and expected benefits for strengthening governance of Inspector-General recommendations

Current gaps	Proposed enhancements	Expected benefits
Governance framework is largely conceptual; lacks operational detail	Develop and embed detailed governance artefacts (decision rights, triage thresholds, escalation protocols)	Moves framework from concept to practice; ensures clarity and accountability
No risk-based triage or differentiated treatment of recommendations	Introduce tiered approach for low-, medium- and high-risk recommendations	Improves efficiency; avoids over-processing minor items while ensuring robust oversight for high-risk issues

Closure template lacks risk assessment, assurance and escalation fields	Enhance closure template with risk-based fields, evidence standards, assurance steps and escalation pathways	Enables defensible, auditable closure decisions; strengthens transparency
Limited integration with reporting and assurance processes	Link implementation and closure templates to reporting packs and assurance protocols	Provides single-source tracking; supports evidence-based reporting to the Strategic Executive Forum, Audit and Risk Committee and the Inspector-General
Manual, paper-based processes; limited analytics capability	Digitalise templates and integrate with enterprise systems (dashboards, automated reminders)	Improves timeliness, visibility and data-driven decision-making
No mechanism for lessons learned or continuous improvement	Add 'lessons learned' section to implementation templates	Builds organisational learning; informs future governance improvements

Adopting the proposed arrangements with suggested enhancements ([Table 4](#)) will ensure the governance model is both strategic and operationally robust, strengthening transparency and driving continuous improvement across the department (Recommendation 5).

Recommendation 5

The department should adopt the proposed governance framework with targeted enhancements for implementation to ensure it is operationally robust and delivers on its objectives. Priority actions include embedding detailed governance artefacts, introducing a risk-based tiered approach, strengthening closure and assurance processes, integrating reporting mechanisms and leveraging digital tools for tracking and analytics.

Department's response: The department agrees with the recommendation.

The department continues embedding a refreshed governance framework to enhance IGB recommendation management and implementation. This includes revised artefacts which will standardise tracking, monitoring and reporting against IGB recommendation progress to facilitate a more streamlined process for IGB recommendation management.

The department welcomes the suggestions for further refinements to ensure robust and effective products, tools, and reporting. Many of the additional suggestions for this recommendation, including areas for further refinement of procedures and artefacts, have been progressed. We will continue prioritising this work scheduled to be completed by early 2026 (with ongoing business improvements to be adapted, as required).

To ensure the department's proposed governance framework delivers its intended benefits, it is important to verify that the enhancements, such as risk-based triage, escalation protocols, integrated reporting and digital tracking, are effectively embedded and operational. While the framework provides a strong strategic foundation, its success will ultimately depend on consistent application and measurable improvements in the timely and auditable closure of recommendations. Independent oversight of this transition will provide assurance that the governance reforms are achieving their objectives and identify any further refinements needed to strengthen accountability and performance. It is therefore recommended that the next Inspector-General consider reviewing the vigour of renewed governance framework after its implementation (Recommendation 6).

Recommendation 6

The next Inspector-General of Biosecurity should consider conducting a targeted review of the department's progress in implementing pending recommendations after the proposed governance framework has been adopted. This review should assess whether the enhanced governance arrangements—such as risk-based triage, escalation protocols, integrated reporting and digital tracking—are effectively driving timely, auditable and evidence-based closure of recommendations. Measuring performance in this way will provide assurance on the framework's effectiveness and identify any further improvements needed to strengthen accountability and continuous improvement.

Department's response: The department notes the recommendation.

The department considers that this recommendation is appropriate for the next IGB to consider. Notwithstanding this, the department welcomes the opportunity to work with the incoming IGB, as appropriate. This could include providing updates on progress of the refreshed governance framework, covering recommendation closures, long-standing recommendations, and related performance measures.

4.4 Action or implementation plans

Action or implementation plans for individual audit recommendations are critical component of effective governance and risk management. Without such plans, recommendations risk being overlooked, misunderstood or implemented inadequately, diminishing the value of the review itself. The Inspector-General highlights that the benefits of developing action or implementation plans for individual recommendations are varied:

- *Clarity and specificity:* Breaks down broad recommendations into actionable, measurable steps, removing ambiguity.
- *Accountability:* Clearly assigns responsibility for each action to specific individuals or teams, fostering ownership.
- *Prioritisation:* Allows for the sequencing and prioritisation of actions based on risk, complexity and resource availability.
- *Resource allocation:* Helps identify the necessary human, financial and technological resources required for implementation.
- *Monitoring and tracking:* Provides a framework for ongoing monitoring of progress and identification of roadblocks.
- *Evidence of closure:* Facilitates the collection of evidence to demonstrate that recommendations have been addressed satisfactorily.
- *Improved outcomes:* Increases the likelihood that the underlying issues identified by the audit are effectively resolved, leading to improved processes, reduced risks and enhanced organisational performance.
- *Transparency:* Supports reporting to executives, audit committees and external bodies (like the Inspector-General and the ANAO), demonstrating due diligence and commitment to improvement.

By meticulously developing and adhering to implementation plan for each pending recommendation, the department can transform review and audit findings from mere observations into tangible improvements that would help strengthen its operations and mitigate risks. The Inspector-General suggests that the department consider the elements presented in the proposed guide for developing action plans (see Appendix B).

Conclusion

This review underscores the need for the Department of Agriculture, Fisheries and Forestry to address longstanding governance and implementation gaps in managing Inspector-General of Biosecurity recommendations. Without a centralised framework, clear accountability and robust systems for tracking and reporting, the department risks ongoing inefficiency, loss of corporate knowledge and diminished stakeholder trust.

The department's proposed governance framework represents a strong strategic foundation for managing Inspector-General recommendations, with clear principles, refreshed governance structures and alignment to risk-based oversight. However, the framework currently remains largely conceptual and lacks the operational depth required for consistent, timely and auditable implementation. Critical gaps include detailed decision rights, risk-based triage, escalation protocols and integrated reporting and assurance mechanisms. To ensure the framework delivers its intended benefits – transparency, accountability and defensible closure – the department should adopt the proposed governance arrangements subject to the development and embedding of supporting operational artefacts including tiered templates, standardised reporting packs, digital enablement and clear escalation pathways. This phased adoption approach will balance strategic intent with practical execution, reducing the risk of governance failure and improving organisational performance.

Strong leadership, sustained commitment and a willingness to embrace independent oversight will be critical to delivering these outcomes and ensuring that the department's biosecurity governance meets the highest standards of accountability and effectiveness.

The Inspectors-Generals' recommendations provide a clear pathway for reform: codify governance arrangements, prioritise actions based on risk, invest in modern systems and embed a culture of transparency and continuous improvement. Successful implementation of these reforms will not only close the current backlog of recommendations but also position the department to proactively manage future biosecurity risks and maintain public confidence in Australia's biosecurity system.

Appendix A: Agency response



Australian Government
Department of Agriculture,
Fisheries and Forestry

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ACTING SECRETARY

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Dear Dr Klumpp,

Thank you for your correspondence of 19 September 2025, providing your draft review report, *"Review of the implementation of the IGB recommendations to improve the Australian biosecurity system"*.

I appreciate your insights and observations regarding IGB recommendation governance and acknowledge the findings and recommendations outlined in your draft report. My formal response to each of the recommendations outlined in your report is at **Attachment A**.

As you are aware, the department is committed to ensuring appropriate governance and management for IGB recommendations, to support intended recommendation outcomes. The department is committed to the ongoing improvement of the biosecurity system.

I value your collaborative approach in working with us to develop a refreshed IGB review implementation governance framework. The department will ensure that, where appropriate, the enhancements you have proposed to this refreshed governance framework are implemented effectively and expediently.

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

On behalf of the department, as your tenure reaches its conclusion, I wish to thank you for your investment towards the continuous improvement of the biosecurity system during the past three years. I wish you all the best for your future endeavours.

Kind regards,

Justine Saunders APM
Acting Director of Biosecurity
Acting Secretary, Department of Agriculture, Fisheries and Forestry

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Attachment A: Department of Agriculture, Fisheries and Forestry – response to the Inspector-General of Biosecurity report: *Review of the implementation of the IGB recommendations to improve the Australian biosecurity system.*

Recommendation 1

The department should urgently procure and implement a single, integrated and certified enterprise-grade Audit and Recommendation Management System (aka ARMS) that is specifically designed to centralise, track and manage all findings and recommendations, irrespective of their originating body (Internal Audit, ANAO, Inspector-General of Biosecurity or external reviewers). This system must incorporate robust data management and migration capabilities to ensure the enduring preservation and accessibility of historical information, even during system upgrades, decommissioning and machinery of government changes.

Departmental Response:

The department notes the recommendation.

The department continues to improve our governance system and enterprise performance and reporting as part of implementing the Transformation Action Plan. As part of this, the department is investigating an integrated system to track and manage recommendations from audits, assurance activities, and independent reviews. This will enable the most efficient, effective, and transparent approach to prioritise and implement improvements to organisational capability.

The department is currently evaluating the most suitable approach to identify and implement an integrated system, subject to funding availability. This system will meet data management and retention policies to ensure continuity of historical information.

Recommendation 2

The department should develop and implement a comprehensive data migration and retention framework including mandatory protocols for robust data backup, validation and transfer, to ensure the continuous and accessible preservation of all critical historical information when systems are decommissioned or replaced, or when the departmental responsibilities shift due to machinery of government changes.

Departmental Response:

The department notes the recommendation.

Further to the response to recommendation 1, the department is committed to ensuring that information and records meet legislative requirements, relevant international standards, and guidance from the National Archives of Australia. The department's information governance framework provides record-keeping policies, procedures and training for all persons engaged in a business undertaking with the department.

The department will develop a records and information management plan for recommendations management. A decommissioned systems archival framework, supported by a digital archival solution, are deliverables of the Capital Security, Technology and Asset Refresh project which is underway. The project's objective is to establish a clear, information-centric process for managing and governing structured and unstructured data from decommissioned department IT systems throughout their archiving and disposal phases.

Recommendation 3

When the implementation of a recommendation faces extensions or delays, the department, in collaboration with the Inspector-General, should conduct a thorough re-assessment of associated risks and the urgency of timely action. This process will ensure the recommendation remains valid and that its implementation is strategically targeted for maximum effectiveness.

Departmental Response:

The department agrees with the recommendation.

The department is committed to ongoing collaboration with the incoming IGB, including on approaches to the assessment of risks and urgency, to ensure the effectiveness and expediency of implementation of accepted IGB recommendations.

As you are aware, the department has recently established a refreshed governance framework for IGB recommendation management. The department is committed to ongoing improvement, and to continuing to refine its approach to IGB recommendation governance.

As part of the revised governance framework, the Biosecurity Operations and Compliance Group (BOCG) has established a Senior Executive Service level 2 Risk Management and Performance Reporting Working Group reporting to the BOCG Strategic Executive Forum to provide risk-based oversight of recommendations. As part of this oversight function, the department will monitor delayed implementation and associated risks to identify clear remedial actions and prioritisation of efforts needed. Reporting to the department's Audit and Risk Committee and Executive Board, as required, will also be part of this oversight. This will ensure transparency and accountability.

The department welcomes engagement with the IGB, as appropriate, as part of this re-assessment process.

Recommendation 4

The department should continue its collaboration with the Inspector-General of Biosecurity in reassessing open recommendations for their currency and its ability to progress implementation.

Departmental Response:

The department agrees with the recommendation.

As part of the department's refreshed governance framework for IGB recommendation management, the department is embedding a risk-based approach to ensure a coordinated, holistic and thematic approach to recommendation implementation and closure. Specifically, the department is conducting a thematic review to ensure timely closure of outstanding and open IGB recommendations. This review is being competed against clear principles and risk ratings (i.e. practicality of implementation, validity of the recommendation and whether the recommendation requires new funding). The department is keen to address the intent of the recommendations and address the risks identified. This review will be completed by end-2025.

The department recognises the importance of an ongoing collaborative partnership with the IGB to address key risks and opportunities to strengthen the department's biosecurity activities. We would welcome engagement with the IGB, where appropriate, to test long-standing recommendation validity, underlying risks, and any relevant risk mitigations.

Recommendation 5

The department should adopt the governance framework proposed by the Biosecurity Strategy and Reform Division, with targeted enhancements for implementation to ensure it is operationally robust and delivers on its objectives. Priority actions include embedding detailed governance artefacts, introducing a risk-based tiered approach, strengthening closure and assurance processes, integrating reporting mechanisms and leveraging digital tools for tracking and analytics.

Departmental Response:

The department agrees with the recommendation.

The department continues embedding a refreshed governance framework to enhance IGB recommendation management and implementation. This includes revised artefacts which will standardise tracking, monitoring and reporting against IGB recommendation progress to facilitate a more streamlined process for IGB recommendation management.

The department welcomes the suggestions for further refinements to ensure robust and effective products, tools, and reporting. Many of the additional suggestions for this recommendation, including areas for further refinement of procedures and artefacts, have been progressed. We will continue prioritising this work scheduled to be completed by early 2026 (with ongoing business improvements to be adapted, as required).

Recommendation 6

The next Inspector-General of Biosecurity should consider conducting a targeted review of the department's progress in implementing pending recommendations after the proposed governance framework has been adopted. This review should assess whether the enhanced governance arrangements—such as risk-based triage, escalation protocols, integrated reporting and digital tracking—are effectively driving timely, auditable and evidence-based closure of recommendations. Measuring performance in this way will provide assurance on the framework's effectiveness and identify any further improvements needed to strengthen accountability and continuous improvement.

Departmental Response:

The department notes the recommendation.

The department considers that this recommendation is appropriate for the next IGB to consider. Notwithstanding this, the department welcomes the opportunity to work with the incoming IGB, as appropriate. This could include providing updates on progress of the refreshed governance framework, covering recommendation closures, long-standing recommendations, and related performance measures.

Appendix B: Guide for developing implementation plans

The Inspector-General proposes a guide for the department to develop implementation plan for each recommendation agreed by the department for implementation. Effective implementation plans should be SMART: specific, measurable, assignable, realistic and time bound.

The Inspector-General recommends the following key elements and steps to develop robust implementation plans.

A. Understand and confirm the recommendation's intent

- *Deconstruct the recommendation:* Do not just read the surface. What is the root cause the recommendation is trying to address? What is the desired outcome or improvement?
- *Collaborate with the reviewer:* If there is any ambiguity, consult with the review team to ensure a shared understanding of the recommendation's intent and scope.
- *Identify the 'why':* Understanding the underlying risk or inefficiency will help in crafting more effective solutions.

B. Assign ownership

- *Designated owner:* Assign a specific individual (by role/position, not necessarily name, for continuity) or a clearly defined business unit/team that is directly responsible for implementing the recommendation. This should be someone with the authority and resources to effect change (typically a first assistant secretary or an assistant secretary).
- *Supporting roles:* Identify other individual(s) who need to contribute to the implementation.

C. Break down recommendations into specific actions

- *Detailed steps:* Break the overall recommendation into smaller, manageable and actionable steps or milestones. Each step should be clearly defined.
- *Process mapping:* For process-related recommendations, consider mapping the current and desired future state to identify all necessary changes.
- *Root cause analysis:* Ensure that the actions address the root cause of the issue, not just its symptoms.

D. Define deliverables and evidence of completion

- *Measurable outcomes:* For each action, clearly define what constitutes 'done'. What specific output or change will be produced?
- *Evidence:* Determine what documentation, records or other evidence will demonstrate that the action has been completed and is effective (for example, updated policy document, training records, system configuration screenshots, reconciliation reports, management sign-off). This is crucial for review follow-up, closure and transparency.

E. Set realistic timelines

- *Start and end dates:* Assign clear start and target completion dates for each action and for the overall recommendation.
- *Consider dependencies:* Account for any dependencies between actions or with other ongoing projects.
- *Resource availability:* Ensure the timelines are realistic given available resources and competing priorities. High-risk recommendations would often warrant shorter timelines.

F. Identify resources required

- *Personnel:* Who needs to be involved and what are their estimated time commitments?

- *Budget:* Are there financial costs associated with implementing the recommendation (for example, new software, training, external consultants)?
- *Technology:* Are there system changes or new tools required?

G. Establish a monitoring and reporting mechanism

- *Regular progress reviews:* Schedule regular meetings (weekly, monthly, quarterly) with action owners to review progress, identify impediments and adjust plans as needed.
- *Centralised tracking system:* Implement a dedicated system (for example, a project management tool or a specialised audit management software) to track all recommendations and their implementation status. This system should capture all the elements outlined above.
- *Escalation path:* Define a clear process for escalating issues or delays to senior management or the audit committee.
- *Status reporting:* Develop a consistent template for reporting on the status of recommendations to relevant stakeholders (such as executives, audit committee, Inspector-General). As highlighted in this report, this should go beyond just 'open/closed' and include rationale, challenges and next steps.

H. Validate effectiveness and closure

- *Post-implementation review:* Once actions are completed, conduct a review to ensure the recommendation has been truly and effectively implemented and that the intended outcome has been achieved. This might involve retesting controls or processes.
- *Sign-off:* Establish a formal process for the recommendation owner and potentially an independent party (such as a governance body) to formally sign off on the closure of the recommendation, based on the evidence provided.
- *Continuous improvement:* View the implementation of audit recommendations as part of a broader continuous improvement cycle.

Glossary

Term	Definition
Agreed in principle	Refers to a departmental response to a recommendation where the department supports the intent or objective of the recommendation but has not committed to implementing it in full or in the manner proposed. This response may indicate: • a need for further analysis, feasibility assessment or consultation before implementation • conditional agreement, subject to resource availability, legislative constraints or alignment with other priorities • an intention to address the issue through alternative means or at a later stage.
ANAO	Australian National Audit Office An independent agency of the Australian Government responsible for auditing and reviewing the performance and financial management of Commonwealth entities.
ARC	Audit and Risk Committee This committee plays a key governance role within the department by overseeing the implementation of recommendations from internal and external audits, including those from the Inspector-General of Biosecurity and the Australian National Audit Office.
ARMS	Audit and Recommendation Management System Refers to a proposed enterprise-grade IT system designed to centralise, track and manage all findings and recommendations arising from: • Internal Audit • Australian National Audit Office • Inspector-General of Biosecurity • other external reviewers. Its purpose is to replace fragmented, manual processes – such as spreadsheets and PDMS entries – with a unified, auditable and workflow-enabled platform.
BCB	Biosecurity Compliance Board A senior governance body within the department that oversees strategic direction, policy alignment and operational coordination across biosecurity functions. Abolished in 2023, the BCB played a central role in: • setting strategic objectives for biosecurity enforcement, education and communications • reviewing and directing actions using the SSCC model (Start, Stop, Change, Continue) • coordinating with ministers, industry and states/territories through forums, memoranda of understanding and targeted intelligence • ensuring compliance with departmental governance frameworks such as the BRMF escalation matrix. The BCB also delegated tasks and decisions to subcommittees and working groups and it was involved in biosecurity advocacy campaigns and policy reviews.

Term	Definition
BEPC	Biosecurity Executive Performance and Coordination This team within the department's Biosecurity Strategy and Reform Division (BSRD) is responsible for coordinating and overseeing the implementation of recommendations from the Inspector-General of Biosecurity reviews.
BRMF	Biosecurity Risk Management Framework
Closure	Refers to the formal process by which a recommendation is deemed fully implemented and no longer requires further action, monitoring, or reporting.
FAS	First Assistant Secretary Refers to a senior executive role within the Australian Public Service, typically responsible for leading a division within a department. The FAS is accountable for strategic oversight, governance and performance assurance across their division.
IIGB	Interim Inspector-General of Biosecurity The IIGB position was first set up in July 2009 and was active through 2016. The position was not backed by legislation and the IIGB reported to the minister for agriculture. Two officers were in the role between 2009 and 2016.
IGB	Inspector-General of Biosecurity The IGB position was set up in July 2016 after the department enacted the Biosecurity Act 2015. To date, there have been 3 statutory officers appointed in this role by the minister for agriculture.
PDMS	Parliamentary Document Management System A government-wide platform used to draft, store, process and control ministerial, parliamentary and executive documents.
SEF	Strategic Executive Forum A high-level executive forum within the department.
SES	Senior Executive Service High-level executives within the Australian Public Service who are responsible for strategic leadership, decision-making and oversight across government departments. In the context of this report, SES officers are involved in: • signing off on the closure of Inspector-General recommendations • providing formal endorsement for departmental actions and governance processes.
SMART	Used to describe a framework for developing effective implementation plans for recommendations. It stands for Specific, Measurable, Assignable, Realistic, Time-bound.

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