Australian Government
Inspector-General of Biosecurity

Maturity of the department's biosecurity regulatory system

Review report no. 2025–26/01

Cataloguing data

This publication (and any material sourced from it) should be attributed as: Inspector-General of Biosecurity (2025). *Maturity of the department's biosecurity regulatory system*. Canberra, October. CC BY 4.0.

This publication is available at Current and completed reviews | Inspector-General of Biosecurity.

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Acknowledgements

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The Inspector-General acknowledges the cooperation and input from the Department of Agriculture, Fisheries and Forestry.

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Executive summary

Continuing growth in the volume and complexity of global trade and travel has put Australia's biosecurity under increased pressure, meaning there is a heightened risk that exotic pests, weeds and diseases will enter the country, threatening our economy, environment and agricultural industries.

The Department of Agriculture, Fisheries and Forestry plays a central role in managing biosecurity risk, and it must have strong and effective regulatory systems in place to achieve its responsibilities in this area.

The Inspector-General of Biosecurity (the Inspector-General) provides assurance over the department's biosecurity risk management systems. As part of this role, the Inspector-General conducts regular reviews of the department's biosecurity regulatory system to measure its maturity and effectiveness.

The Inspector-General conducted this review of the department's regulatory maturity using a tailored maturity assessment framework based on the Modern Regulator Improvement Tool (MRIT).

Assessment overview

The MRIT assessment revealed that the department has a strong foundational vision and some areas of emerging maturity. However, its biosecurity regulatory system remains largely in a 'developing' phase.

Key findings

The MRIT assessment shows a system with pockets of maturity but also significant gaps, particularly in areas critical to regulatory effectiveness and credibility. Internal frameworks and tools exist, but they are inconsistently applied and staff have limited awareness of regulatory performance systems.

Notably, there is a lack of high-level governance bodies and cross-jurisdictional forums. This has contributed to fragmented oversight and limits the department's ability to coordinate, prioritise and respond strategically to biosecurity threats. This governance gap leaves Australia exposed to increasing biosecurity risks.

Priority areas for improvement

To meet the demands of a rapidly evolving biosecurity landscape, the department must commit to a sustainable, system-wide improvement process. As part of this process, it must embed the maturity assessment framework into regular practice so that it can address critical governance gaps and foster a culture of continuous learning and accountability.

The Inspector-General has identified 3 priority attributes for initial focus:

1. *Organisational culture and leadership focus:* Strengthen leadership commitment and embed a regulatory culture across all levels.
2. *Regulatory assurance function and review:* Enhance internal review mechanisms to ensure consistent, evidence-based decision-making.
3. *Governance and oversight:* Establish a robust, enduring governance framework to drive accountability, coherence and whole-of-system coordination.

The department should review the remaining 9 attributes of the MRIT in future years, guided by risk, performance trends and strategic priorities, to ensure a comprehensive and staged uplift in regulatory maturity. It is essential that these foundations be strengthened so that Australia's biosecurity system remains resilient, credible and fit for the future.

Review recommendations

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 must break the cycle of fragmented reform by immediately prioritising and committing to a sustained, full implementation of a single, overarching regulatory maturity program. This program should integrate the best elements of previous initiatives in relation to, for example, digital transformation, continuous improvement and staff empowerment; and be explicitly endorsed and championed at the highest levels of the department.

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

The department is committed to prioritising and delivering an ongoing regulatory maturity program, to build trust and confidence in our regulatory settings. This will integrate effective elements and learnings from past successes and challenges to refine our systems and processes.

The department's Deputy Secretaries will form a new regulatory stewardship oversight group to provide strong leadership in overseeing whole-of-department regulatory maturity and performance uplift. This group will agree key priorities and set the annual work plan of the department's Regulatory Practice Committee (RPC), which consists of the department's First Assistant Secretary regulatory leaders. The RPC work plan will establish clear expectations, set the organisation's priorities for regulatory maturity, and will provide a cohesive and enduring framework of improvement. The establishment of the RPC's 2026 work plan, which will be pragmatic and implementable, and commensurate to funding and resourcing, will be settled by December 2025. This approach to integrated governance will ensure clear prioritises, strong accountability and implementation, and a coordinated, long-term commitment to regulatory maturity.

Recommendation 2

The department should establish a clear, robust and enduring governance framework for regulatory stewardship, ensuring that critical functions (such as consistent capability uplift, policy coherence and whole-of-government representation) – originally intended for the department's Chief Regulatory Officer role – are comprehensively and accountably managed, regardless of specific role titles or departmental restructures.

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

The department is committed to progressing a more robust governance framework to underpin effective regulatory stewardship.

Recognising that regulatory responsibility is shared throughout the department, effective collaboration and interconnected leadership is necessary to ensure dispersed expertise and accountability are harnessed from across the department. The Deputy Secretary oversight group will provide clear leadership and ultimately be accountable for integrated outcomes. This group and the RPC (with its refreshed work plan) will provide the department's primary governance mechanism to deliver whole-of-department regulatory leadership and stewardship.

This specific regulatory governance will also report to other departmental corporate Senior Executive Service (SES) governance, as appropriate. The RPC is embedded in the department's corporate SES governance (as a tier 3 committee). The RPC will ensure that regulatory activities are aligned with strategic objectives and that coordinated efforts are maintained across critical functions such as capability uplift, policy coherence, and whole-of-government representation. Moving forward, the department considers this will be the most effective, fit for purpose, approach to its governance of regulatory stewardship.

In addition to the RPC, the Biosecurity, Operations and Compliance Group (BOCG) is implementing a refreshed operating model that will facilitate enhanced situational awareness and coordination across divisions. This model will enable more cohesive reporting on activities, provide a better view of collective risks and resources, and strengthen our ability to manage biosecurity risks effectively.

These initiatives reflect the department's ongoing commitment to regulatory improvement, and the delivery of coordinated outcomes for Australia's biosecurity system.

Recommendation 3

The department should develop and implement an ongoing program to improve the maturity of its biosecurity regulatory system. This program should be underpinned by a formal framework and methodology, such as those outlined in this review, and aligned with broader public sector regulatory reform initiatives.

Given the scale and complexity of the work required, it is recommended that the department adopt a phased approach, focusing on 3 prioritised attributes each year. This will allow for targeted investment, measurable progress and adaptive learning. The initial focus should be on the following foundational attributes:

- *Organisational culture and leadership focus* – encompasses the values, behaviours and strategic priorities that shape how biosecurity is understood and enacted across the department
- *Regulatory assurance function and review* – ensures that regulatory activities are effective, consistent and transparent
- *Governance and oversight* – needed to support strategic alignment and cross-agency collaboration.

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

The department is committed to continuously improving its performance, capability and culture, and recognises that strong leadership, governance, monitoring, and reporting is important in ensuring effective regulatory stewardship.

Our biosecurity regulatory system is already supported by a matrix of activities addressing regulatory strategy and design, regulator capability and knowledge management and regulatory assurance and reporting. These are supported by robust governance mechanisms within the department's BOCG, and there is opportunity to further leverage the activities through the Deputy Secretary oversight group, and the RPC and its work plan.

The department is currently evaluating the most suitable approach to assess the maturity of its biosecurity regulatory systems, noting the system is a national one that encompasses state and territory government, industry and other stakeholders. In doing so, the department notes the Department of Finance's regulatory maturity assessment framework and tool for use by Australian Government agencies. Outcomes of this evaluation will guide our approach and ensure alignment to broader public sector reforms.

Dr Lloyd Klumpp
Inspector-General of Biosecurity

21 October 2025

1 Review process

The Department of Agriculture, Fisheries and Forestry is the lead regulatory agency for managing biosecurity at the Australian border. The Inspector-General of Biosecurity (Inspector-General) provides impartial and transparent scrutiny of Australia's biosecurity risk management system to ensure its effectiveness. The Inspector-General's 2022–2025 work program includes a review to assess the maturity of the department's biosecurity regulatory system.

1.1 The Inspector-General of Biosecurity

Australia's biosecurity system relies on various government programs that ensure the safe international movement of goods and people. The programs are designed to minimise the risk that exotic pests and diseases can enter Australia, become established and then spread throughout the country, causing significant harm to plants, animals, people and our unique environment. The department is responsible for delivering most of these programs in cooperation with industry.

The Director of Biosecurity plays a central leadership role in managing and overseeing national and organisational biosecurity policies, strategies and regulatory systems. The Director of Biosecurity is also the Secretary of the Department of Agriculture, Fisheries and Forestry.

The Inspector-General independently reviews the Director of Biosecurity's performance of functions and exercise of powers. The Inspector-General is statutorily appointed by the agriculture minister but remains independent of the Director of Biosecurity. However, the Inspector-General may consider the minister's request for a review. The *Biosecurity Act 2015* and Biosecurity Regulation 2016 define the Inspector-General's role, authority and independent powers of review.

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, particularly pre-border and at-border. The Inspector-General's independent, evidence-based reviews identify specific risks, gaps or weaknesses in biosecurity measures (such as screening, risk assessments, import processes); and make recommendations that can catalyse improvements to the biosecurity system. This process helps the department stay sharp, accountable and ready for emerging threats to Australia's agriculture, environment, economy and exports.

The Inspector-General's reviews also provide an assurance framework for stakeholders, in that independent, evidence-based review reports on the performance of Australia's biosecurity system clearly showcase to stakeholders what is working, what's not and where improvements are needed. Transparency is further enhanced by highlighting internal processes that may otherwise remain hidden from external view.

1.2 Review objectives and scope

The objectives of this review were to:

1. broadly assess the maturity of the department's biosecurity regulatory system
2. identify priority areas the department should prioritise for further assessment and improvement in its regulatory maturity.

Within the scope of this review were:

- regulatory systems, policies and processes that implement the *Biosecurity Act 2015* and subordinate legislation, which are the responsibility of the department's Biosecurity, Operations and Compliance Group
- regulatory functions and exercise of powers under the *Biosecurity Act 2015* – that is, the elements of the biosecurity regulatory system that are within the remit of the department.

1.3 Out of scope

This review did not examine regulatory functions of the department that are outside the remit of the *Biosecurity Act 2015.*

1.4 Conduct of the review

During this review, the Inspector-General had discussions with key stakeholders both within and outside the department.

In particular, the Inspector-General:

- conducted a series of meetings with senior executives within the department's Biosecurity, Operations and Compliance Group to:
  - communicate the review's objectives and scope
  - outline responsibilities
  - identify risks related to the review and appropriate mitigation strategies
  - obtain initial background information relevant to review objectives, scope and focus areas
  - provide an opportunity to discuss/brainstorm and seek points of clarification about the proposed review process
  - discuss preliminary data and information requirements and the process of requesting data and information
- conducted a desk audit of relevant departmental data and documentation (such as standard operating procedures, decision support material, policies and communications material) and processes relevant to the regulation of biosecurity
- collaborated with the department's Regulatory Assurance Operations team on the development of a standardised framework to assess department's regulatory maturity (more details in Chapter 6)
- conducted a Have Your Say survey to invite staff of the department's Biosecurity, Operations and Compliance Group to respond to 12 attributes of regulatory maturity.

As required by the *Biosecurity Act 2015*, the Inspector-General presented his draft report to the Director of Biosecurity for departmental consideration and response.

2 Background

2.1 Biosecurity — a critical infrastructure of national significance

Australia's 60,000 kilometres of coastline offer exotic pests, weeds and diseases a multitude of pathways into the country. Our biosecurity system plays a critical role in reducing the risk of these types of incursions to an acceptable level and ensuring our nation remains one of the few countries in the world that is free from the world's most invasive pests, weeds and diseases.

Australia manages biosecurity risks through the Department of Agriculture, Fisheries and Forestry. The department formulates a biosecurity regulatory framework that establishes regulatory systems to protect $51 billion in agriculture, fisheries and forestry export industries; $50 billion in tourism; $5.7 trillion in environmental assets; and more than 1.6 million jobs (DAFF 2025a).

2.2 Regulatory systems

The department administers 5 regulatory systems in the agricultural, fisheries and forestry sectors:

- *Biosecurity*: The department assesses and manages biosecurity risks and risks relating to ballast water pursuant to the *Biosecurity Act 2015* and associated charging legislation.
- *Export*: The department regulates goods for export pursuant to the *Export Control Act 2020* and associated charging legislation.
- *Illegally logged timber*: The department prohibits the import of illegally logged timber and the processing of illegally logged domestic raw logs pursuant to the *Illegal Logging Prohibition Act 2012*.
- *Imported food*: The department ensures food imported into Australia complies with Australian food standards and public health and safety requirements pursuant to the *Imported Food Control Act 1992* and associated charging legislation.
- *Levy and charge collection*: The department administers primary industry levy and charge collection to improve efficiency and effectiveness pursuant to the *Primary Industries Levies and Charges Collection Act 1991* and associated imposition legislation (DAFF 2023a).

The Agriculture, Fisheries and Forestry portfolio has 3 additional regulatory functions, which are delivered by the following statutory agencies:

1. Australian Pesticides and Veterinary Medicines Authority
2. Australian Fisheries Management Authority
3. Wine Australia.

This review assessed only the biosecurity regulatory system. The Inspector-General did not review other regulatory systems or functions.

2.3 Legislative framework

The *Biosecurity Act 2015* provides the legal authority to manage risks associated with the importation of goods, conveyances and people into the country.

The Biosecurity Act provides for:

- a flexible, risk-based approach to managing biosecurity
- powers to prevent and manage biosecurity threats
- clarity and consistency in biosecurity legislation
- enhanced focus on the biosecurity continuum (pre-border, at-border and post-border).

The Biosecurity Regulation 2016 supports the Biosecurity Act by detailing specific requirements and operational rules for managing biosecurity risks, including import conditions and enforcement mechanisms for noncompliance management.

Australia's biosecurity system uses a risk-based approach to manage risk of entry and spread of exotic pests and diseases, using research, science and intelligence to target key threats. Critical supporting elements include surveillance and monitoring, strong industry partnerships and focused border control activities at airports, seaports and mail centres.

In the context of regulatory maturity, it is important to acknowledge that various reports – those of the Australian National Audit Office (ANAO 2017), Ernst and Young (EY 2018) and the Inspector-General of Biosecurity (IGB 2021a) – have identified issues with the department's implementation of the Biosecurity Act. Notably, in his review *Adequacy of department's operational model to effectively mitigate biosecurity risks in evolving risk and business environments* (IGB 2021a), the former Inspector-General comprehensively discussed the poor implementation of the Biosecurity Act and summarised:

> The department did not complete the planned rollout of the *Biosecurity Act 2015* implementation program, leaving managers, technical staff and frontline officers inadequately trained and supported in the delivery of the new regulatory regime (IGB 2021a, p 25).

2.4 Biosecurity management

In administering the Biosecurity Act, the department undertakes a range of pre-border, at-border and post-border regulatory activities to manage biosecurity risks associated with imported cargo, international travellers, mail and conveyances. These biosecurity regulatory functions are discussed below.

2.4.1 Pre-border

Pre-border (overseas) activities focus on working with foreign governments and agencies, importers and other stakeholders to mitigate risk and reduce the number and frequency of exotic pests and diseases reaching Australia's border.

2.4.2 At-border

At the border, the department screens and inspects conveyances, freight, mail and passengers for biosecurity threats; and undertakes verification, assurance and post-entry quarantine to prevent exotic pests and diseases from entering Australia.

2.4.3 Post-border

Post-border, the department works collaboratively with state and territory governments, importers, growers, peak industry bodies and the community to manage residual biosecurity risks associated with imported goods that have been released from biosecurity control. The Inspector-General's authority to review biosecurity matters is limited to peri-urban areas where the department engages with other stakeholders (state and territory agencies and the industry). Broadly, post-border activities the department participates in include:

- monitoring and surveillance
- post-entry quarantine
- emergency preparedness – practice and simulations for pest, weed and disease management
- national coordination and response to pest and disease incursions
- enhancing capacity to prepare, detect and respond to pests and diseases
- education and awareness.

2.5 Biosecurity governance arrangements

Biosecurity regulatory activities are jointly managed by 5 divisions within the department's Biosecurity, Operations and Compliance Group (Biosecurity Group):

- The **Biosecurity Animal Division** focuses on animal health surveillance, import risk analysis and emergency response to animal disease outbreaks.
- The **Biosecurity Plant and Science Services Division** oversees plant health surveillance, diagnostics, import risk analysis and emergency pest responses.
- The **Biosecurity Operations Division** manages border inspections, post-entry quarantine and compliance enforcement.
- The **Biosecurity Strategy and Reform Division** leads policy development, stakeholder engagement and strategic program implementation.
- The **Compliance and Enforcement Division** investigates noncompliance, promotes voluntary compliance and enforces biosecurity legislation.

These divisions are expected to work together to ensure a comprehensive and coordinated approach to biosecurity.

3 Biosecurity regulatory obligations, strategies and principles

3.1 National Biosecurity Strategy

In 2022, the department released the first National Biosecurity Strategy (the Strategy) (DAFF 2022a) to address biosecurity risks that are becoming increasingly complex and difficult to manage. To ensure Australia continually strengthens its system in this challenging and dynamic environment, the Strategy describes the current and future biosecurity environments and contains 6 priority areas with initial actions for implementation (DAFF 2022a).

Over the next 10 years, the Strategy will continue to serve as a roadmap for Australia's biosecurity system. It will govern the way the Australian and state and territory governments work together to address biosecurity challenges as they emerge. The Strategy notes:

> A more flexible, improved risk-based regulatory system is needed to drive more efficient and harmonised processes using targeted and adaptable regulatory frameworks that provide benefits to all stakeholders. We have significant opportunities to facilitate coordinated data sharing and operationalise innovations in technology to support faster, risk-based decision-making and traceability. Co-regulation with industry can also provide material benefits to all stakeholders in managing risk and streamlining processes when they are carefully designed and supported by harmonised compliance frameworks (DAFF 2022a).

The Strategy is a living document that is reviewed every 5 years or sooner if there is a significant change to the risks, challenges or opportunities.

3.2 Regulatory obligations

The department has significant biosecurity regulatory obligations to protect Australia from harmful exotic pests and diseases. Key obligations include:

- administration of primary legislation
- risk management across the biosecurity continuum
- offshore and onshore measures
- compliance and enforcement
- international obligations
- collaboration
- emergency preparedness and response.

The department adheres to Australia's international biosecurity obligations, including those under the World Trade Organization Agreement on Sanitary and Phytosanitary Measures, under the International Plant Protection Convention and from the World Organisation for Animal Health. The department also works closely with state and territory governments, industry and other stakeholders to ensure Australia's biosecurity system is cohesive and to support compliance. The department also plays a crucial role in national preparedness for and response to exotic pest and disease incursions. For example, it establishes biosecurity zones and, in severe cases, recommends a biosecurity emergency declaration.

3.3 Regulatory Practice Statement

The Regulatory Practice Statement (RPS) (DAFF 2023b) outlines the department's objective to regulate effectively by understanding and managing regulatory risks, meet the outcomes of each of its regulatory systems and continuously monitor the performance of regulatory systems to ensure that their purposes are met. It is one of the core strategic documents that steer the department's regulatory improvement activities.

The RPS sets out the principles that underpin the department's regulatory practice and its approach to regulatory responsibility. The RPS principles are intended to guide the department's administration of its regulatory systems and assist it in working with stakeholders to deliver regulatory outcomes. The principles apply to all departmental regulatory systems, including biosecurity.

The Inspector-General did not evaluate how effectively the department applies these principles to the biosecurity regulatory system.

3.4 Regulatory Assurance Strategy

In 2025, the department updated its Regulatory Assurance Strategy (DAFF 2025b) which supports the department's RPS. The strategy focuses on the department's approach to regulatory assurance across its regulatory systems, internal processes and practices, ensuring that the department's approach to assurance is consistent and effective.

The strategy sets out 4 objectives of the department's regulatory assurance:

- *Increased confidence*: Internal and external stakeholders – portfolio ministers, the Australian Government, stakeholders and the community – are confident that the department is efficiently and effectively managing regulatory risk and achieving its objectives across all its regulatory systems.
- *Improved decision-making*: The department's regulatory assurance practices are providing insights that support lawful, evidence-based, transparent and timely regulatory decisions.
- *Improved regulatory maturity*: The department's regulatory systems, processes and culture are maturing and embedded as part of business-as-usual activities.
- *Regulatory assurance is adaptive*: The department's regulatory assurance can adapt to the context of each regulatory system, proportional to the level of risk and consistent with the department's risk appetite and tolerance.

The Regulatory Assurance Strategy is guided by 9 regulatory assurance principles:

> Our regulatory assurance activities are guided by our regulatory assurance principles. The 9 principles underpin our efforts to ensure regulatory assurance is fit for purpose, both within each regulatory system and holistically across the department. The department will implement internal regulatory assurance consistent with these principles.

The responsibilities of the Chief Regulatory Officer have passed to the Principal Regulatory Officer, Plant and Live Animal Exports, Welfare and Regulation Division. The department has also established the Regulatory Practice Committee to oversee the implementation of the Regulatory Assurance Strategy across the department. It is unclear how effective this mechanism will be. The Inspector-General believes it is important that the strategy is implemented and that the associated internal assurance framework is developed as a critical part of the regulatory system.

4 Regulatory reforms and reviews

4.1 Biosecurity and regulatory reforms

Australia's biosecurity and regulatory landscape has undergone significant transformation, driven by a need for modernisation, efficiency and enhanced risk management.

In June 2016, the outdated *Quarantine Act 1908* was replaced by the *Biosecurity Act 2015*. The new Act presented a modern, risk-based framework for biosecurity management. It introduced:

- more streamlined powers
- a new emphasis on shared responsibility with stakeholders
- a wider range of compliance tools (such as infringement notices, civil penalties)
- formalised Approved Arrangements for businesses
- improved information sharing
- strengthened human health biosecurity powers.

The Biosecurity Act aimed to create a flexible, proactive system, although implementation has been challenging (IGB 2021a, ANAO 2017).

The Australian Government's Deregulation Agenda (DoF 2019), launched in 2019, sought to boost productivity and reduce costs by cutting unnecessary regulations. The agenda promotes risk-based systems, cost-effective regulation and enhanced regulator performance, with a goal of generating over $21 billion in economic benefits over 10 years (see *Deregulation Agenda report card* (Australian Government 2022)).

The Australian Government Biosecurity 2030 Strategy (DAFF 2021a), first published in 2021 (and later replaced by the Biosecurity 2030 Roadmap in December 2024 (DAFF 2024a)), provides a strategic roadmap for Australia's biosecurity system. Its core focus areas include strong governance, skilled people, leveraging science and technology, modern regulation and sustainable funding, aiming to address increasing global biosecurity risks.

Internally, the department-initiated *Being future ready: our future department blueprint 2021–2025*, published in September 2021 (DAFF 2021b), focused on maturing regulatory practices through digital transformation, continuous improvement and strengthened support structures. However, this initiative was abandoned in 2022 when the department established the taskforce Designing DAFF, which aimed to renew the department's strategic direction under a new government.

In 2022, following the Independent Review of the Australian Public Service (Thodey Review) (PM&C 2019), the Australian Public Service Commission (APSC) Capability Review Program was reintroduced. A September 2023 APSC Capability Review of the department (APSC 2023) highlighted the need for improved governance, enterprise performance and reporting, strategic policy capability and workforce planning. Most departmental capabilities were rated as 'developing', indicating weaknesses and gaps.

In response to the APSC Capability Review, in 2023 the department launched a Transformation Program (DAFF 2023c), which aimed for transparent, efficient and risk-based regulatory systems by 2027. In June 2024, the department initiated an Organisation Design Program (DAFF 2024b) to implement APSC recommendations, with key streams focused on building a strong corporate centre, uplifting strategic policy and building regulatory capability. Concurrently, to give effect to these reforms, in August 2024 the department released the *Statement of Strategic Intent: growing Australia together* (DAFF 2024c), which outlined its vision and strategic objectives.

The Inspector-General notes that the department has faced significant external drivers for change. However, the department's commitment and ability to consistently implement and embed its strategic plans have been hampered by shifts in internal priorities and a reactive approach to addressing identified weaknesses. This has prevented a more rapid and comprehensive uplift in the department's overall regulatory maturity.

The Inspector-General emphasises that the department needs to prioritise and sustain its internal regulatory uplift and strategic initiatives if it is to strengthen its regulatory systems.

4.2 Inspector-General review, 2021

In 2021, the former Inspector-General (IGB 2021a) reviewed the department's biosecurity operational model. The report highlighted that the Australian biosecurity system is under significant pressure due to a foundational lack of regulatory maturity; an inadequate operational model; and persistent issues with accountability, decision-making and internal communication. The report made 19 recommendations, several of which have not been fully implemented (IGB, forthcoming). Notably, the former Inspector-General stated:

> My broad assessment is that the biosecurity system is not in a strong position to address the diverse and evolving biosecurity risks and business environment expected to prevail in 2021 and through to 2025. This assessment is based on an examination of the systemic problems, including the department's regulatory maturity, its approach to co-regulation, inadequate frontline focus, and the absence of an appropriate funding model. Several other issues, which are termed 'understanding' and 'mindset', are discussed in the report, as these will impact the department's ability to address the systemic issues with the operational model (IGB 2021a, p 4).

It is perplexing that the issue of starting reform initiatives for improvements to the biosecurity system and not completing them – as identified in the former Inspector-General's report (IGB 2021a) – is still relevant in 2025:

> [Finding] The culture of the department and the ongoing cycle of new biosecurity pressures and new government initiatives has generated an environment where the department is much better at starting initiatives and promising improvements than it is at delivering the targeted outcomes and locking in completed reforms (IGB 2021a, p 25).

Also, of the 4 priorities for reform of the Australian biosecurity regulatory system that the Inspector-General identified in the 2021 review (IGB 2021a), 'regulatory maturity' remains on the top of the list. The Inspector-General had recommended:

> [Recommendation 19] There are 4 reform priorities that must be progressed concomitantly, with appropriate strategy, resourcing and timelines for each, if the department is going to free itself from current debilitating drag on its performance and set itself on a course to confidently deliver excellent biosecurity outcomes towards 2025 and beyond:
>
> 1) Regulatory maturity
>
> 2) Risk pathway partnership
>
> 3) Frontline focus
>
> 4) Sustainable funding model (IGB 2021a, p 78).

The current Inspector-General concurs with the former Inspector-General that 'regulatory maturity' remains the top priority for the department, but that progress appears to have stalled because the department's focus has regularly shifted from one reform initiative to another. This suggests a lack of commitment or focus on regulatory maturity as a strategic priority.

4.3 Internal audit, 2022

In March 2022, the department's Internal Audit team released a review report, *Design of regulatory functions: scoping study and functional overview* (DAFF 2022b). The review examined the department's approach and ability to meet regulatory objectives. It also looked at whether the department has processes to:

1. promote a professional and capable regulatory workforce
2. ensure that it regulates appropriately, proportionately and cost effectively
3. promote collaborative engagement with regulated entities.

The report highlighted several fundamental weaknesses in the department's biosecurity regulatory system and specifically noted that the department lacked processes to:

- assess the performance of the regulatory workforce as a whole and benchmark against other regulators
- monitor compliance in a systematic way and decisions made in a timely manner
- vary its approach based on the risks to regulatory objectives
- respond to noncompliance in a proportionate manner.

The Inspector-General concurs with this assessment and recommends that the department prioritise a review of its regulatory processes to maintain a modern biosecurity regulatory system.

4.4 The short-lived Office of the Chief Regulatory Officer, 2024–25

In July 2024, the department established the Office of the Chief Regulatory Officer (OCRO). The OCRO was one of the priority changes under the department's Organisation Design Program. It was designed to uplift regulatory maturity, regulatory capability and performance across the department through a coherent and robust approach to regulatory stewardship.

The OCRO's mandate was comprehensive. It was to:

- support the organisation to be an efficient, effective and trusted regulator
- represent the organisation on whole-of-government regulatory matters and ensure the department meets government expectations, such as Regulatory Leadership Cohort
- help support a consistent and contemporary approach to training and development
- support development and maintenance of fit-for-purpose policies and tools
- foster a culture of continuous improvement, learning from past successes/challenges
- support effective and transparent engagement with stakeholders.

However, the OCRO was ended just 10 months after it was established, in May 2025, and its responsibilities passed to the Principal Regulatory Officer within the department's Plant and Live Animal Exports, Welfare and Regulation Division. In addition, the department has also formulated the Regulatory Practice Committee, which will now oversee the implementation of the Regulatory Assurance Strategy across the department.

The Inspector-General noted that, while the responsibility has been reassigned, this abrupt disbanding of the OCRO:

- could signal instability in the department's approach to regulatory transformation. It risks slowing down the crucial process of equipping frontline staff with necessary skills and could compromise the department's ability to maintain a unified, effective and trusted regulatory posture in a complex biosecurity environment
- carries significant risks for the department's management of regulatory activities and its overall regulatory maturity.

The Inspector-General is not aware of the reasons for disbanding the OCRO. However, given the risks associated with disbanding the OCRO and the 'developing' maturity rating in the APSC Capability Review report, the Inspector-General recommends that the department review its decision and appoint a competent individual to continue the role.

4.5 Miscellaneous third-party reviews

The Inspector-General is aware that the department has engaged a number of third-party consultants to review the department's regulatory systems to identify their strengths and weaknesses. These reviews highlighted issues and weaknesses in the biosecurity regulatory system similar to those identified in this report.

4.6 Perpetual reform hinders attempts to improve regulatory maturity

Since 2021, the department has been caught in a cycle of shifting reform initiatives, moving from 'Being Future Ready' to 'Designing DAFF' and then to responses to the APSC Capability Review. This cycle has been occurring alongside ongoing efforts like 'Australian Government deregulation'. This continuous and fragmented shift in focus has demonstrably hindered the department in its efforts to uplift its regulatory maturity. A cascade of negative consequences has resulted from beginning but not fully embedding reform efforts:

- *Wasted efforts and resources*: Each new initiative demands significant investment in time, personnel and financial resources. When a program is abandoned or sidelined before completion, investments become largely futile. The initial strategic planning, stakeholder consultations, staff training and development of new frameworks are all effectively wasted, generating no lasting improvements. This translates to substantial financial losses and missed opportunities to apply those resources to tangible, sustained change.
- *Confusion and frustration among staff*: Staff on the ground often bear the brunt of these shifting priorities. They invest their energy and expertise in understanding and implementing one reform, only to see it superseded by another. This creates immense confusion about the department's true strategic direction and what is genuinely expected of them. The constant churn leads to deep frustration, disengagement and a sense of 'initiative fatigue' – that is, staff become cynical about new programs, assuming they will also be abandoned. This ultimately erodes morale and trust in leadership, as previously pointed out (IGB 2021a).
- *Stalled regulatory maturity*: True regulatory maturity is built through sustained, focused and iterative effort, not through a series of disconnected, aborted starts. Initiatives like Being Future Ready specifically targeted areas that are crucial for maturity: improving digital workflows, embedding continuous improvement and strengthening support structures for lawful decision-making. However, because the department moved on before these reforms were fully implemented and embedded, it lost the opportunity to:
  - achieve lasting process improvements – digital transformations require significant buy-in and sustained effort to be effective
  - cultivate a culture of continuous improvement – this is a long-term endeavour that demands consistent leadership and dedicated teams
  - embed consistent and lawful decision-making – this requires robust frameworks, training and ongoing support, which are undermined by shifting priorities.
- *Lack of accountability*: When initiatives are abandoned, it is difficult to measure their impact or hold anyone accountable for their success or failure. This lack of clear closure and demonstrable results further contributes to the sense of wasted effort and inhibits organisational learning. The former Inspector-General made the same observation (IGB 2021a).

The Inspector-General acknowledges that the department's episodic engagement with reform, rather than a commitment to seeing a single, comprehensive regulatory maturity initiative through to completion, has created a detrimental cycle. It has not only squandered valuable resources and demoralised its workforce (Inspector-General, personal communication) but also, most importantly, stalled its progress towards achieving the robust and 'future-ready' regulatory maturity it clearly needs to achieve if it is to deal effectively with evolving and increasing biosecurity risks. The focus has inadvertently been on starting reforms, rather than completing them and embedding their benefits.

Recommendation 1

The department must break the cycle of fragmented reform by immediately prioritising and committing to a sustained, full implementation of a single, overarching regulatory maturity program. This program should integrate the best elements of previous initiatives in relation to, for example, digital transformation, continuous improvement and staff empowerment; and be explicitly endorsed and championed at the highest levels of the department.

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

The department is committed to prioritising and delivering an ongoing regulatory maturity program, to build trust and confidence in our regulatory settings. This will integrate effective elements and learnings from past successes and challenges to refine our systems and processes.

The department's Deputy Secretaries will form a new regulatory stewardship oversight group to provide strong leadership in overseeing whole-of-department regulatory maturity and performance uplift. This group will agree key priorities and set the annual work plan of the department's Regulatory Practice Committee (RPC), which consists of the department's First Assistant Secretary regulatory leaders. The RPC work plan will establish clear expectations, set the organisation's priorities for regulatory maturity, and will provide a cohesive and enduring framework of improvement. The establishment of the RPC's 2026 work plan, which will be pragmatic and implementable, and commensurate to funding and resourcing, will be settled by December 2025. This approach to integrated governance will ensure clear prioritises, strong accountability and implementation, and a coordinated, long-term commitment to regulatory maturity.

5 Regulatory maturity assessment tool

5.1 Regulatory maturity

'Regulatory maturity' is the extent to which a regulatory body possesses the organisational structures, governance, expertise, processes, resources and stakeholder engagement mechanisms necessary to develop, implement, enforce and continuously improve regulatory practice that is consistent with relevant legislation; transparent; evidence-based; and risk-proportionate in meeting its strategic objectives and public interest obligations.

There is sufficient evidence that, since the 2016 enactment of the Biosecurity Act, a lack of regulatory maturity has been impacting the department's biosecurity functions. This adversely affects the import sector and could potentially result in an increase in the residual biosecurity risk exposure of Australia (IGB 2021a). The former Inspector-General gave several examples where the department's lack of regulatory maturity made it a less agile and less progressive biosecurity regulator (IGB 2021a). In particular, he noted:

> Inadequate regulatory maturity, system design and attitudes are evident in key parts of the department's biosecurity regulatory framework (IGB 2021a, p 5).
>
> … the department's biosecurity divisions have not reached the level of regulatory maturity (pervasive knowledge, competency, confidence and consistency) necessary for optimal functioning of Australia's lead biosecurity agency (IGB 2021a, p 24).

5.2 Modern Regulator Improvement Tool

In 2015, the Australasian Environmental Law Enforcement and Regulators neTwork (AELERT) published the Modern Regulator Improvement Tool (MRIT). The MRIT gives agencies an objective tool to assess their regulatory maturity and identify areas for improvement. This self-assessment tool assists agencies to evaluate their progress towards becoming more modern regulators by examining strengths and weaknesses across 12 key attributes, grouped within 4 broad regulatory characteristics (Table 1). The MRIT was updated in 2024.

Table 1 MRIT regulatory characteristics and associated attributes

Regulatory characteristic	Attributes
1. Leadership and culture	1. Organisational culture and leadership focus
	2. Regulatory philosophy and approach
	3. Stakeholder and community engagement
2. Vision, role and strategy	4. Corporate plan and contribution
	5. Risk-based regulatory approach
	6. Problem solving approach
3. Capability and improvement	7. Regulatory officer capability
	8. Regulatory assurance function and review
	9. Learning and growing with others
4. Governance and delivery	10. Activity and visibility
	11. Performance reporting
	12. Governance and oversight

Using a structured, step-by-step maturity scale (from 'absent' to 'leading'), the MRIT could enable the department to create tailored action plans, enhancing its ability to deliver its regulatory activities and effectively manage biosecurity risks.

5.2.1 Suitability of MRIT for regulatory maturity assessment

The Inspector-General views the MRIT as a suitable tool for the department to use to assess the maturity of its biosecurity regulatory system. However, there are some key considerations in using it – for example:

- The tool has been developed for environmental regulators. Therefore, it requires adaption to tailor the descriptors to the biosecurity context.
- The tool is designed for a broad assessment of attributes of a regulatory system and is not designed for detailed diagnostics.
- There is a level of subjectivity in the use of the tool.

Despite these considerations, the Inspector-General recognises that a highly nuanced tool is not necessary for current purposes. The goal was to gain a broad picture of the department's regulatory capabilities, highlighting general strengths and weaknesses and identifying common themes that can guide reform efforts to improve the department's regulatory maturity. A more detailed assessment may be conducted using the tools developed during this review (see Appendix B).

5.2.2 Benefits and application of MRIT

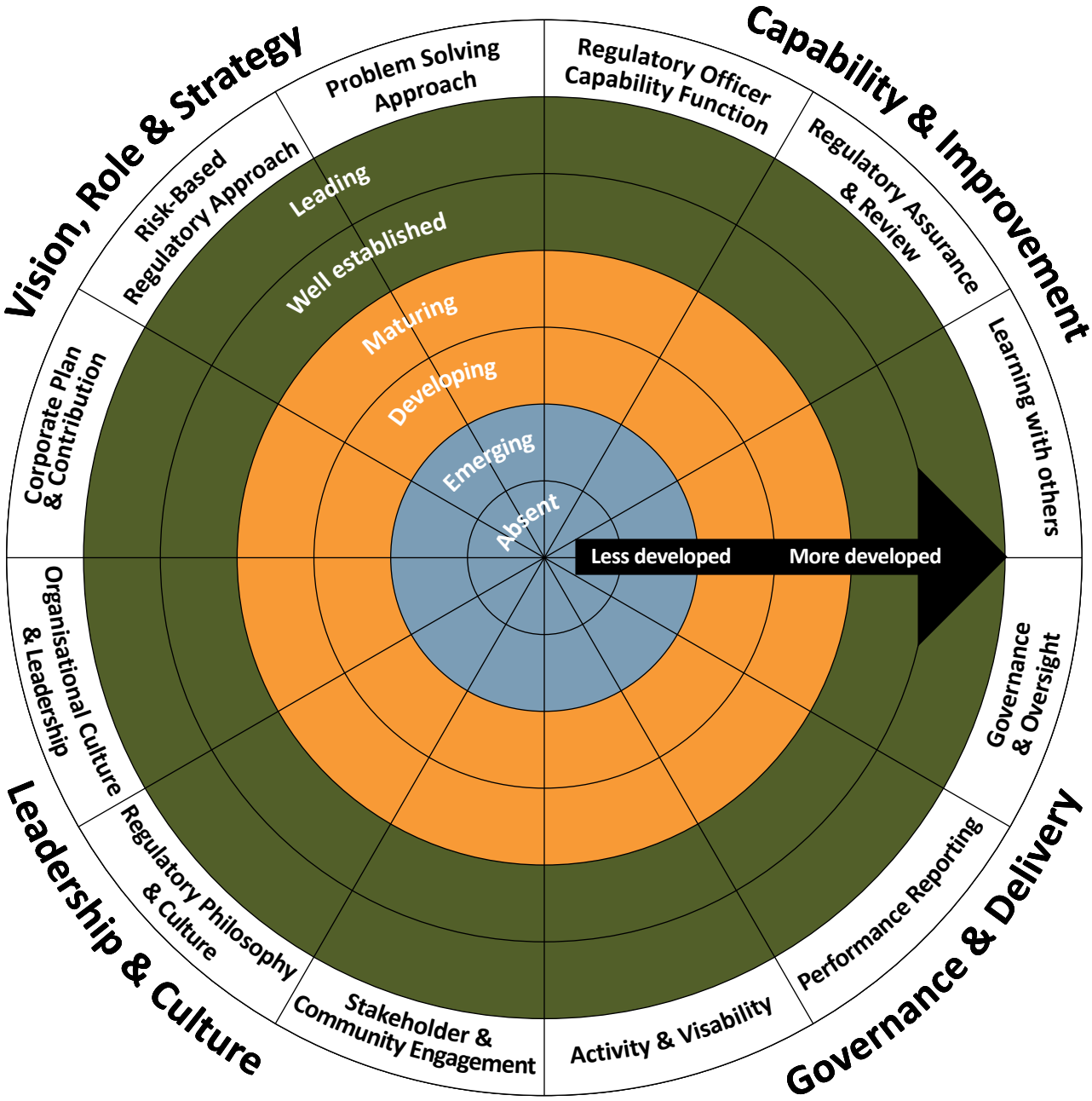
The main benefit of using the MRIT is that it can give an understanding of an organisation's regulatory landscape in a general sense – it is not intended to give in-depth assessments of specific maturity levels. The tool is not designed to make detailed comparisons between organisations; instead, it aims to foster an overall awareness of regulatory capacity. By focusing on trends in the levels of regulatory maturity per attribute, organisations can more effectively identify areas for improvement and streamline their reform activities (Figure 1).

The MRIT can be applied in several ways to enhance overall regulatory maturity:

- It can measure and track changes in regulatory maturity over time to monitor progress.
- It enables leaders and executives to make informed prioritisation decisions to improve regulatory practice.
- It can help to build public trust and confidence in the regulator.
- It contributes to regulatory assurance and the overall health of the regulatory system.

The MRIT is versatile and can be applied across various regulatory contexts. This flexibility is demonstrated by its use by other statutory officers, such as the Inspector-General of Water Compliance (IGWC 2024) and several agencies, including the Department of the Environment (2016), the Victorian Government (2017) and New Zealand Ministry of the Environment (2021).

Figure 1 Overview of the Modern Regulator Improvement Tool



Source: Australasian Environmental Law Enforcement and Regulators neTwork

6 Development of assessment framework

The Inspector-General used the following framework, encompassing a phased approach, to assess the department's regulatory maturity.

6.1 Define scope and boundaries

- *Map the regulatory landscape*: Identify all relevant regulatory policies, processes and functions under the Biosecurity Act that fall within the Biosecurity, Operations and Compliance Group's responsibility.
- *Establish assessment parameters*: Based on the Modern Regulator Improvement Tool (MRIT) attributes (explained in Phase 2 below), define the specific areas of regulatory maturity that will be the focus of the assessment.

6.2 Develop methodology

The Inspector-General, in collaboration with the Regulatory Assurance Operations team, developed a framework to assess the department's biosecurity regulatory maturity. This framework is based on the MRIT model's principles and includes a detailed set of strategic questions, which can be found in Appendix B. The department could use or adapt this framework to conduct regulatory maturity assessment on a regular basis.

The following steps were used for developing the assessment methodology:

- *Adapt the MRIT*: In collaboration with the Regulatory Assurance Operations team, a set of questions was developed to assess the MRIT attributes specific to the context of the Biosecurity Act and Regulations.
- *Design the assessment tools*: A Have Your Say survey, interviews and workshops were created with the adapted MRIT attributes. A detailed list of strategic questions are available in Appendix B.
- *Select the questions*: For the high-level assessment undertaken by this review, the Inspector-General picked a set of these questions for the Have Your Say survey (see Appendix C). To make it easier for the survey respondents, the Inspector-General adjusted some questions and eliminated others. The tools, developed in cooperation with the Regulatory Assurance Operations team, aimed to enable a more detailed assessment of each attribute than was conducted in this review.
- *Determine data sources*: The sources of the necessary corroborating information (for example, policy documents, operational procedures, compliance reports, staff and stakeholder feedback) were identified.
- *Assess the individual MRIT attributes*: The tools developed earlier were used as a basis for a clear and consistent methodology to evaluate the maturity level for each attribute.

6.3 Consult and engage staff

To gather insights, in addition to documentary examination, the Inspector-General conducted a survey through the Have Your Say platform, inviting biosecurity staff within the Biosecurity, Operations and Compliance Group to provide their views and evidence relevant to the review's scope.

The survey questionnaire was structured around the 12 attributes of the MRIT and contained 54 questions (Appendix C). Biosecurity staff responded enthusiastically, with highly satisfactory engagement. The survey was conducted in November 2024, and 128 staff members began and 99 successfully completed it. Twenty-nine respondents did not finalise their input; therefore, their incomplete responses were excluded from further analyses.

Table 2 provides a breakdown of staff engagement by Australian Public Service (APS) level. Most of the respondents (64) were APS1–6 level staff, followed by EL1 and EL2 staff (35 respondents).

Table 2 Staff engagement with survey by APS levels

APS level	Count
APS1–6	64
EL1 and EL2	35
Total	99

Table 3 illustrates staff engagement by division within the Biosecurity, Operations and Compliance Group (Biosecurity Group). Most of the responses (68) came from the Biosecurity Operations Division, followed by the Biosecurity Plant and Science Services Division (13), Compliance and Enforcement Division (12), Biosecurity Strategy and Reform Division (4) and Biosecurity Animal Division (2).

Table 3 Staff engagement with survey by division within Biosecurity, Operations and Compliance Group

Division	Count
Biosecurity Operations Division	68
Biosecurity Plant and Science Services Division	13
Compliance and Enforcement Division	12
Biosecurity Strategy and Reform Division	4
Biosecurity Animal Division	2
Total	99

The Inspector-General notes that the high level of engagement by the staff within the Biosecurity Operations Division was not only expected but also highly valuable, as these staff are responsible for delivering most biosecurity regulatory activities across Australia. Given their extensive frontline experience and direct involvement in delivering day-to-day regulatory operations, they provide a crucial perspective on the status of the department's regulatory maturity.

The relative weight of stakeholder contributions to each of the MRIT's characteristics and attributes varies. This is because the Inspector-General has focused on the key issues and potential solutions that contributors identified, so the source of the input is not a feature. In no case has the Inspector-General sought to identify the contributions of any individual.

7 Regulatory maturity assessment and ratings

7.1 Regulatory maturity ratings

From the department's documentation, interviews and staff input through the Have Your Say survey, a clear picture of the department's regulatory maturity emerges (Table 4). The department has a solid foundational vision, but there are significant challenges in the practical and cultural aspects of its implementation.

This section provides a detailed assessment of survey responses to each of the Modern Regulator Improvement Tool's (MRIT's) 4 main characteristics and 12 attributes.

Table 4 Inspector-General's assessment of biosecurity regulatory syste

MRIT characteristics and attributes	Maturity rating
Leadership and culture	
1. Organisational culture and leadership focus	Developing
2. Regulatory philosophy and approach	Maturing
3. Stakeholder and community engagement	Developing
Vision, role and strategy	
4. Corporate plan and contribution	Well established
5. Risk-based regulatory approach	Developing
6. Problem-solving approach	Emerging
Capability and improvement	
7. Regulatory officer capability framework and functions	Developing
8. Regulatory assurance function and review	Emerging
9. Learning and growing with others	Emerging
Governance and delivery	
10. Activity and visibility	Developing
11. Performance reporting	Developing
12. Governance and oversight	Developing

7.2 Leadership and culture

The MRIT describes the 'leadership and culture' of an agency as its ability to establish and communicate a clear vision, aligning staff, stakeholders and the regulated community toward common goals. Together, leadership and culture create a foundation for effective regulation, guiding the agency's approach to noncompliance, decision-making and stakeholder engagement.

7.2.1 Organisational culture and leadership focus: Developing

'Organisational culture' refers to the shared values, expectations and practices that shape the way the department interacts and fulfils its regulatory role. The organisational culture is a dynamic and evolving environment that shapes how regulation is perceived, practised and enforced. A strong organisational culture is crucial for achieving effective and efficient regulation, fostering ethical conduct and promoting positive outcomes for all stakeholders. The benefits of having a strong organisational culture include improved compliance, enhanced reputation, improved collaboration with stakeholders and overall reduction in biosecurity risks. A strong organisational culture is a key driver for improving regulatory performance (Nous 2021 (unpublished)).

'Leadership focus' involves articulating a clear vision, inspiring its adoption, providing the necessary resources and effectively balancing diverse interests.

The Inspector-General assessed the department's maturity in 'Organisational culture and leadership focus' to be 'developing'. While a vision and values exist, their full integration is incomplete. Discussions are largely confined to leaders and some staff, rather than being organisation wide. Leaders recognise the importance of communicating this vision externally, but it remains a work in progress.

A significant challenge lies in the disconnect between high-level strategic documents and day-to-day biosecurity operations. Given the good quality of the strategic documents, the disconnect appears to be a cultural one driven by behaviour and attitudes. This gap prevents staff from fully aligning their work with the department's vision and values. Bridging this gap would enhance clarity, improve decision-making and drive regulatory uplift.

In reviewing survey responses, the Inspector-General noted that, while the department's functional values are documented and decisions often use collaboration and data, several issues hinder the responsiveness of the regulatory framework and the department's ability to adapt to changing circumstances:

- *Reactive decisions and limited frontline engagement*: Decision-making tends to be reactive, with insufficient input from frontline staff. High leadership turnover further impedes the department's ability to embed the desired regulatory culture.
- *Unclear leadership evaluation*: Despite surveys and reviews, staff are uncertain how feedback influences leadership decisions or how leadership actions are evaluated. By formalising evaluation processes, clearer pathways for leadership development would be created and overall effectiveness would be improved.
- *Siloed communication*: Within the Biosecurity, Compliance and Operations Group (Biosecurity Group), communication is fragmented, leaving some staff feeling excluded from key processes. A top-down approach limits the feedback flow that is crucial for a collaborative culture. While various communication channels exist, their consistency and focus often vary.
- *Lack of transparency and remote staff disconnection*: Limited frontline engagement and a lack of transparency in decision-making undermine the department's adaptability. Regional staff, in particular, often feel disconnected, hindering their ability to contribute to the regulatory culture.

The Inspector-General notes that issue of regulatory uplift initiatives not being visible across systems is consistent with the finding of the 2022 Internal Audit team report *Design of regulatory functions* (DAWE 2022), which noted:

> … Lack of awareness of better practice was identified as a theme in McGrathNicol's 2018 Overview of Regulatory Systems, consequently it appears that a lack of visibility of initiatives in other business areas is an ongoing issue (DAWE 2022, p 38).

This may be in part due to the deficiency in the culture of the organisation, with a lack of follow-through from strategic processes to implementation. Similarly, in reviewing the department's regulatory culture (IGB 2021a), the former Inspector-General also noted:

> … the department does not have appropriately aligned functions with a sufficiently strong regulatory culture (IGB 2021a, p 25).
>
> [Finding] The culture of the department and the ongoing cycle of new biosecurity pressures and new government initiatives has generated an environment where the department is much better at starting initiatives and promising improvements than it is at delivering the targeted outcomes and locking in completed reforms (IGB 2021a, p 25).

The Inspector-General concurs with the Internal Audit team assessment and former Inspector-General's findings: since 2021, the department has undergone substantial machinery of government changes and organisational restructuring and has been subject to independent reviews emphasising reforms to its regulatory delivery (see Chapter 4). Clearly, this has affected the organisational culture and leadership focus, resulting in a maturity rating of 'developing'.

Finding 1

The department has defined its regulatory culture, but embedding this culture throughout the Biosecurity Group is in its initial stages. The vision and values are clearly articulated in documentation, yet implementation is incomplete due to gaps in communication and engagement, especially with frontline staff.

To drive cultural change and strengthen its regulatory culture, the department should:

- foster inclusive, transparent and consistent leadership
- ensure feedback actively informs decision-making and leadership development
- bridge the gap between strategic objectives and daily operations
- improve communication across all levels
- strengthen leadership evaluation processes.

7.2.2 Regulatory philosophy and approach: Maturing

'Regulatory philosophy and approach' refers to how an agency articulates and applies its guiding principles for regulation. This includes its role as a regulator, the use of its powers and the factors considered when responding to noncompliance or harm.

It also covers regulatory posture – the overall stance, philosophy and operational approach a government regulator adopts in carrying out its functions. Regulatory posture could be considered the 'personality' of the regulator and affects the way is it perceived – for example, as strict and punitive or supportive and collaborative; or as focused on prevention or primarily on remediation.

In 2022–23, the Australian National Audit Office (ANAO) audited the effectiveness of the design and implementation of the department's cultural reform (ANAO 2023) and noted:

> … the department's posture is unclear, and staff lack awareness of the legislative framework for decision-making. Staff perceived a lack of legal support to assist in timely decision-making (ANAO 2023, p 25).

The former Inspector-General (IGB 2021a) comprehensively discussed the department's regulatory posture under its role as 'regulator versus facilitator' and recommended:

> [Recommendation 1] The department should address the major root causes of the 'regulator versus facilitator' confusion – principally through actions that will improve its regulatory maturity and regulatory delivery – and communicate to both staff and industry in practical language its ongoing improvement as Australia's national biosecurity agency (IGB 2021a, p 33).

The Inspector-General has identified the following primary elements that influence the department's regulatory posture:

- legislative mandate
- policies and priorities
- risk profile of the sector
- stakeholder expectations
- resourcing and capability.

The Inspector-General did not evaluate the way these elements individually affect the department's regulatory posture in the context of the biosecurity regulatory system but has captured these in the stakeholder feedback and discussions in Chapter 6.

The department's 'regulatory philosophy and approach' is at a 'maturing' level. A publicly available regulatory policy, complete with guiding principles, posture and culture, is proactively shared with stakeholders. However, despite this high-level documentation, not all staff can accurately articulate or align with the department's regulatory philosophy and approach.

The department employs a tiered, risk-based approach to biosecurity regulation, consistent with legislation and formally captured in its Regulatory Practice Statement (RPS) (DAFF 2023b). This philosophy is structured and communicated both internally and externally, emphasising accessibility, transparency and stakeholder alignment on regulatory principles. The approach is managed through educational outreach, audits, regulatory actions and escalation procedures. Despite these efforts, a significant portion of staff have a mixed understanding of the department's regulatory philosophy and approach.

The Inspector-General noted that, while the department possesses a robust and documented regulatory philosophy, its application within the Biosecurity Group is compromised, particularly in the management of noncompliance. The ANAO has previously identified this issue (ANAO 2021), and the staff responses to the Have Your Say survey also confirmed there were inconsistent enforcement practices – for example, stronger penalties for passenger clearance compared with less frequent sanctions for commercial imports.

Staff highlight concerns about a lack of consequence for repeat offenders; and inconsistent enforcement due to perceived political pressure to prioritise trade facilitation over robust regulation. Feedback also points to a lack of visibility on noncompliance reporting once a report is submitted; gaps in addressing persistent issues like illegal imports or loopholes in cargo and mail pathways; and a lack of follow-up on reported noncompliance. Furthermore, staff note leniency in addressing noncompliance from high-profile businesses, and they call for a more transparent and fair application of enforcement.

Finding 2

The department possesses a documented regulatory philosophy and approach, with leaders and some staff understanding its guiding principles. However, challenges persist in internal communication and enforcement practices across import pathways.

To ensure the effectiveness and responsiveness of its regulatory approach, the department needs to:

- improve internal communication to ensure all staff accurately understand and align with the regulatory philosophy
- enhance transparency and consistency in enforcement practices across all divisions and import pathways
- address concerns about fair application of enforcement
- strengthen follow-up mechanisms for noncompliance reports

7.2.3 Stakeholder and community engagement: Developing

'Stakeholder and community engagement' refers to an agency's ability to actively integrate stakeholder and community perspectives into relevant decisions. This involves various levels of engagement – inform, consult, involve, collaborate and empower – depending on goals, timeframes, resources and the nature of the decision.

The Inspector-General assessed the department's maturity in stakeholder and community engagement as 'developing'. Consistent with this, the department is enhancing its engagement strategy and dedicating resources to establish work programs that proactively and reactively address stakeholder concerns and needs.

Feedback from biosecurity staff to the Have Your Say survey questionnaire confirms the Biosecurity Group's commitment to engagement, supported by the National Biosecurity Communication and Engagement Strategy (DAFF 2020). The executive leadership team actively engages with a broad range of stakeholders, including the Australian Bureau of Agricultural and Resource Economics (ABARES), peak industry bodies (for example, the Department of Agriculture, Fisheries and Forestry Cargo Consultative Committee), trading partners (national plant protection organisations and competent authorities) and other government agencies. Engagement with industry is fostered through Import Industry Advice Notices and surveys and collaboration is evident in Approved Arrangements and cross-divisional initiatives.

Despite these efforts, there is still a key focus on refining the Biosecurity Group's stakeholder engagement practices. Staff feedback to the Have Your Say survey questionnaire also highlights a lack of early involvement of key stakeholders in regulatory decision-making and limited inclusion of smaller community groups. While the Biosecurity Group encourages self-regulation and external partnerships where appropriate (RPS, National Biosecurity Strategy Action Plan 2024 (Australian Government 2024)), a similar approach is reportedly lacking with smaller stakeholder groups.

Also, while the department promotes collaboration and shared responsibility, some staff feel that industry bears excessive responsibility without adequate government oversight, potentially leading to regulatory gaps.

Finding 3

While the department has taken steps to improve its engagement practices, significant areas for improvement remain to achieve greater regulatory maturity. The department is committed to refining its engagement strategy, fostering collaboration and empowering both staff and industry partners. However, the department needs to prioritise:

- a more inclusive engagement approach, particularly for smaller, less organised stakeholder groups, ensuring their feedback is actively incorporated into regulatory decisions
- a balanced approach to shared responsibility, between industry and government to mitigate potential regulatory gaps.

Implementing these improvements will strengthen the department's stakeholder engagement capabilities and enhance overall alignment with regulatory objectives.

7.3 Vision, role and strategy: Not assessed

'Vision, role and strategy' refers to the regulatory theme that sets out the department's strategic goals, objectives and activities, providing the roadmap for future work and ensuring alignment with whole-of-government priorities. By establishing a vision, role and strategy, the department ensures it can remain flexible and responsive to evolving risks, prioritising regulatory efforts where needed, while aligning with broader government objectives.

7.3.1 Corporate plan and contribution: Well established

A corporate or strategic plan outlines an agency's goals, objectives and future activities and details strategies, milestones and desired outcomes. 'Contribution' describes the agency's ability to align its goals with the government's broader agenda.

The department has a 'well established' maturity level for 'corporate plan and contribution'. The corporate plan is clearly integrated into departmental staff work plans, operational/divisional plans and external engagement materials and is adjusted to incorporate Indigenous values and broader whole-of-government outcomes.

Biosecurity staff generally believe their divisional plans align well with the department's corporate plan and support the national biosecurity system, particularly in areas like shared responsibility, collaboration and operational delivery. Key priorities such as strengthening biosecurity, supporting industry productivity and operational effectiveness are integrated into both divisional and broader governmental plans.

However, consistent with findings on 'Culture and leadership focus', concerns remain about the operationality of these plans. There is a disconnect between high-level goals and practical implementation, specifically around information dissemination, on-the-ground execution, performance measurement and the reactive nature of some plans. Communication of plan goals typically occurs through regular team meetings, newsletters and operational staff notices.

Plans are flexible and can be adjusted to address contemporary challenges. Feedback loops from internal channels and scientific reviews enable timely updates, with specific taskforces forming when necessary. Nevertheless, some respondents expressed uncertainty about the frequency and systematic nature of updates, indicating potential inconsistency in communication and implementation across divisions.

Finding 4

While the Biosecurity Group has a well-established approach to corporate planning, with divisional plans aligning with broader government and national biosecurity priorities, challenges persist in the dissemination and practical implementation of these plans.

To improve effectiveness, the department must:

- implement a more structured and consistent approach to communicating plans and measuring performance
- translate high-level plans into practical on the ground examples
- ensure greater consistency across divisions.

7.3.2 Risk-based regulatory approach: Developing

A 'risk-based regulatory approach' involves allocating regulatory effort and response based on an assessment of an agency's risk appetite and the characteristics of the regulated community. This includes mechanisms like annual planning, assessment and decision-making frameworks or other systems to apportion and track effort.

The Biosecurity Group is at a 'developing' maturity level in risk-based regulation. The department is involved in ongoing work to establish a more consistent, risk-based approach. Agencies that are at this level of maturity typically dedicate resources to building a risk-based approach with intelligence-led priorities, planning to expand proactive activities, operating rudimentary data monitoring systems and addressing a largely reactive workload with some forward planning.

The department's use of a risk-based approach to biosecurity regulation is reflected in high-level documents like the RPS and Biosecurity Risk Management Framework (DAFF 2023d). However, there are inconsistencies in staff understanding and application. A significant number of staff are unsure if their divisions have a risk assessment process for regulatory decision-making. This indicates a substantial knowledge gap that hinders full implementation and regulatory effectiveness.

External pressures (such as political influence and industry demands) reportedly impact the prioritisation of regulatory activities, leading to deviations from the documented approach. This necessitates staff flexibility but raises concerns about consistency and the need for improved risk-based prioritisation.

Divisions generally use documented frameworks like the Biosecurity Risk Management Framework (DAFF 2023d) and the Case Categorisation Prioritisation Model to guide their decisions. Regulatory activities are prioritised based on factors such as risk, noncompliance likelihood, trade and biosecurity impact (RPS). However, staff expressed concerns about how these factors are consistently integrated into decision-making and the potential for inconsistencies in the way risk assessments are applied and communicated, particularly about stakeholder impacts.

Divisional and frontline risk assessments (conducted by operational staff directly engaged in enforcement, inspections and other day-to-day biosecurity activities) are updated in response to emerging threats (for example, changes to biosecurity import risk assessments or strengthened biosecurity border measures). However, staff report that formal assessments can be slow and not fit for purpose for rapidly evolving risks, contributing to a perception that the approach to regulation is reactive.

Finding 5

The Biosecurity Group faces significant hurdles in fully implementing a sophisticated risk-based regulatory approach. Inconsistencies in understanding and application across divisions, compounded by knowledge gaps and external pressures, impede effectiveness. The slow pace of formal assessments and limitations of current monitoring systems further hinder rapid response to emerging threats.

To enhance efficiency and effectiveness as a regulator, the department needs to:

- improve staff understanding and consistent application of the risk-based approach across all divisions
- standardise the application and communication of risk assessments, particularly concerning stakeholder impacts
- accelerate formal risk assessment processes to address rapidly evolving threats
- develop robust monitoring systems for regulatory activities
- improve awareness and utilisation of monitoring mechanisms by all staff
- ensure regulatory activities are consistently prioritised in accordance with risk assessments.

7.3.3 Problem-solving approach: Emerging

'Problem-solving approach' refers to how well an agency resolves complex issues by reallocating effort, skills and resources around the problem itself, rather than relying solely on traditional functional structures. This often aligns with agile methodologies and concepts like double-loop learning.

The department demonstrates an 'emerging' maturity level in its problem-solving approach. This indicates that the department is still developing systematic, lean and objective problem-solving processes. The department's current approach is often ad hoc and reactive, and adding to existing staff duties; and problems are identified without a consistently documented process.

While problem-solving tools, such as risk assessments, are integrated into daily biosecurity operations, a lack of consistency across divisions leads to inconsistent or delayed solutions. Even where a solution to a problem should be a whole-of-biosecurity one, problem solving does not appear to occur across the whole Biosecurity Group. Gaps in training and inconsistent application of decision-making support tools further hinder innovative problem solving. Although divisions address emerging issues using these tools, the capability and speed of response vary based on complexity and resource availability.

The department showcases its problem-solving approach through initiatives like the Highly Compliant Importer Scheme (DAFF 2025c), Simplified Targeting and Enhanced Processing Systems Program (DAFF 2023e) and the Hitchhiker Pest Program (DAFF 2024d), which leverage taskforces, team collaboration and stakeholder input. Staff report that frontline issues are resolved rapidly, but high-level decisions tend to be slower due to complexity and resource constraints. It is positive that lessons learned from past decisions actively inform future problem-solving, and divisions conduct regular reviews and policy updates to drive continuous improvement. However, siloed efforts between divisions and inconsistencies in applying these lessons impede timely implementation of improvements.

The department prioritises issues based on risk, utilising frameworks like the RPS and Biosecurity Risk Management Framework (DAFF 2023d) to direct resources. Staff feel senior management prioritises high-risk, high-impact issues, such as pest outbreaks. However, feedback also suggests that informal risk assessments can sometimes override formal frameworks, leading to inconsistent prioritisation. Root-cause analysis is actively conducted and supported by research and collaboration (for example, *Catalysing Australia's biosecurity* (DAFF and CSIRO 2024)), but staff note that limited resources and outdated systems slow processes, often leading to the selection of 'quick fixes' over comprehensive root-cause solutions.

Finding 6

The Inspector-General assessed the department's problem-solving approach as 'emerging', characterised by ad-hoc and reactive methods rather than systematic processes. Inconsistencies across divisions, training gaps, outdated systems and resource limitations hinder effectiveness and innovation. While lessons learned and reviews contribute to improved problem solving, comprehensively addressing root causes remains a challenge.

To achieve a more mature problem-solving capability, the department needs:

- a more structured, collaborative and risk-aware approach
- standardised application of decision-making support tools and enhanced training
- improved consistency in applying lessons learned across divisions
- greater focus on root-cause analysis over quick fixes
- modernised systems and adequate resources to support efficient problem solving.

7.4 Capability and improvement

'Capability and improvement' describes the department's regulatory capability and focus on continuous improvement. Together, capability and improvement promote consistency and fairness through regulatory assurance mechanisms and decision-making, while sharing regulatory knowledge and enhancing practices.

7.4.1 Regulatory officer capability framework and function: Developing

'Regulatory officer capability' refers to an agency's ability to ensure its staff possess the necessary skills (abilities, knowledge and expertise) and competencies at all organisational levels to fulfil the agency's regulatory role and achieve priorities, both now and in the future. For example, staff should have sufficient formal and informal learning, supported by procedures and policies like delegations and standard operating procedures that reinforce expected behaviours and objectives.

A 'regulatory officer capability framework' is crucial for enhancing regulatory functions through accountability and transparency. Agencies at a 'developing' maturity level, according to the MRIT framework, are actively building a centralised, coordinated capability program aligned with core and specific regulatory needs. They conduct capability needs analyses and have a centralised training approach with some core regulatory function procedures. The department is at a 'developing' maturity level for the attribute 'Regulatory officer capability framework and function'.

The Biosecurity Training Centre (in partnership with Charles Sturt University) is an exemplary initiative, providing core regulatory training and specialised programs for biosecurity officers. It also supports capability building for Indo-Pacific neighbours. Despite these efforts, inconsistent access to training remains a concern. Lower level staff feel they lack the opportunities that senior staff have, and high-level staff have noted they have limited development opportunities.

The department assesses staff regulatory capabilities during and after training through scenarios, knowledge tests and informal assessments. This assists the department to identify development needs and track training efficiency. Post-training evaluations utilise job cards, online surveys and workplace monitoring by supervisors. Assessment processes are generally thorough, but concerns persist about consistency, particularly in post-training evaluations for optional training or eLearning courses. Staff report that they do not get detailed feedback or follow-up, and this potentially limits the department's ability to track progress and address capability gaps effectively.

Finding 7

While the department has made strides in promoting capability through its regulatory officer capability framework and a coordinated, diverse training approach, key gaps remain. Inconsistent training access, limited development opportunities for various staff levels and variations in post-training evaluations hinder progress.

To achieve greater maturity in this attribute, aligning with the MRIT framework, the department should:

- strengthen feedback mechanisms within training and evaluation processes
- ensure consistency in evaluation processes across all divisions and training types
- expand training to encompass role-specific competencies, beyond just core competencies, supported by clear procedures reflecting the full scope of roles and responsibilities required for biosecurity regulation.

7.4.2 Regulatory assurance function and review: Emerging

A 'regulatory assurance function' refers to the level of confidence that the department's regulatory systems and activities are managing risks to achieve objectives.

The department's Regulatory Assurance Strategy (DAFF 2025b) outlines how it approaches regulatory assurance across all of its regulatory activities. For example, it has assurance that:

- its regulatory systems are working as intended to achieve the desired regulatory outcomes
- its requirements, including conditions, align with its legislation and are achieving the intended regulatory outcomes
- it is appropriately assessing and monitoring controls that are in place to meet regulatory outcomes
- it is evaluating its performance appropriately and in a manner that allows for continuous improvement.

The department's regulatory assurance is currently at an 'emerging' maturity level. At this maturity level, an agency would have an ad-hoc approach to internal checks, often limited to enforcement decisions. An agency at this level would recognise the benefits of an assurance function and would have allocated resources to develop an internal assurance and review function according to a prioritisation schedule.

Regulatory assurance processes exist in some Biosecurity Group divisions, supported by high-level documentation like the Regulatory Assurance Strategy. However, there is no specific regulatory assurance framework for biosecurity. This lack of specific guidance contributes to variable scope and focus on biosecurity assurance activities and leads to a siloed approach.

Some teams/divisions (for example, Regulatory Assurance Operations team and Plant Imports Assurance) have dedicated resources for regulatory assurance, compliance and verification, focusing on assurance activities, performance monitoring and dashboards. However, feedback highlights gaps in consistency and comprehensiveness of these mechanisms, particularly across the Biosecurity Group as a whole. Ad-hoc assurance mechanisms are present, but staff have concerns about their completeness and reliability.

Finding 8

While the department employs some initiatives for regulatory assurance across the biosecurity continuum, this remains a significant area for improvement. The current regulatory assurance activities are ad hoc and represent a regression in regulatory maturity from 2022–2023. The variability in scope, focus and application of regulatory assurance processes undermines consistency and reliability, impacting assurance mechanisms.

To restore progress and improve regulatory maturity, the department, as a priority, should:

- implement the Regulatory Assurance Strategy consistently across the Biosecurity Group
- develop a specific regulatory assurance framework to guide consistent application
- standardise its regulatory assurance processes across all divisions
- ensure clear documentation and procedures for all assurance activities
- rectify resourcing gaps and ensure adequate staffing for regulatory assurance mechanisms.

7.4.3 Learning and growing with others: Emerging

'Learning and growing with others' refers to an agency's capability in exchanging information and experiences with other regulators as part of networks within the broader regulatory profession. This involves sharing knowledge, skills and sometimes objectives.

The department's level of maturity in this attribute is rated as 'emerging'. At this maturity level, agencies are aware of the value of connecting with and learning from peer agencies, organisations like the National Regulators Community of Practice, Australasian Environmental Law Enforcement and Regulators neTwork (AELERT) and others, but interactions tend to be informal and ad hoc.

Biosecurity leaders and staff are generally aware of regulatory networks and partners, and many believe the department actively engages in partnerships to support shared biosecurity and enforcement objectives. However, many of the department's staff remain unsure about the full extent of these partnerships, and they express a need for clearer communication on the partnerships' scope and governance. This points to a broader lack of awareness of the high-level regulatory objectives of these collaborations among agencies.

External insights from other sectors are incorporated, although the process varies within the Biosecurity Group. The group integrates insights from national and international governmental and non-governmental sources. Staff feedback indicates involvement in joint industry engagement activities, such as joint audits with the Department of Home Affairs and Australian Border Force. While these efforts are widespread, the insights are applied inconsistently in different teams.

Finding 9

The department is aware of the benefits of engaging with regulatory peers, but its engagement is largely informal and ad hoc, reflecting an 'emerging' maturity level.

To achieve greater maturity, the department needs a more structured and transparent approach to knowledge sharing and partnerships with organisations such as AELERT, the National Regulators Community of Practice and other regulators.

7.5 Governance and delivery

Effective governance and delivery are crucial for the department to administer its regulatory functions and achieve its purpose. Robust performance reporting ensures relevant data is collected, enabling the department to assess its effectiveness and inform decision-making.

7.5.1 Activity and visibility: Not assessed

'Activity and visibility' refers to the extent of visibility of the agency's regulatory presence and actions when performing its regulatory role. A regulator at a leading level of maturity has high 'brand recognition' amongst the public, and the public sees the regulator as credible, effective and trustworthy.

The building of trust, credibility and effectiveness relies on:

- recognition of the regulator's 'brand' by the public
- stakeholders and the public understanding the role of the regulator
- respect for the regulator
- awareness of regulatory activities through external communications and promotion
- social media, staff census, public surveys measuring and responding to community attitudes.

For a worthwhile assessment of this attribute, stakeholder and public surveys are essential. However, the Inspector-General did not have the opportunity to make this assessment. Therefore, a defensible assessment of this attribute was not possible in this review.

7.5.2 Performance reporting: Developing

'Performance reporting' involves collecting and using relevant information to assess an agency's effectiveness in its regulatory mission, inform organisational decisions and communicate effectiveness to stakeholders and the public.

The department's performance reporting is at a 'developing' level of maturity. At this maturity level, agencies allocate some resources to performance reporting, consider building internal capability and develop rudimentary systems to collect basic regulatory data for publicly available reports (for example, annual reports). This information also supports internal operational and strategic decision-making.

The Inspector-General noted that the Australian National Audit Office (ANAO), in its report Responding to non-compliance with biosecurity requirements (ANAO 2021), found that the department lacks a performance and reporting framework for biosecurity regulation. The Inspector-General concurs with the ANAO, which recommended establishing a framework that:

- includes internal and external effectiveness/efficiency measures for each biosecurity pathway and the system as a whole
- identifies how performance measures will inform regulation
- ensures staff and executive training on Commonwealth performance framework requirements
- establishes how information management issues will be handled to ensure appropriate performance information is available.

To monitor their regulatory activities, biosecurity divisions use various mechanisms, including audit systems, import data analyses and dashboards. However, many staff are uncertain about whether these mechanisms exist and how often they are used. This highlights a significant gap in performance reporting awareness. A centralised resource providing an overview of the biosecurity system's performance also appears to be lacking.

Internally, some divisions have dedicated teams and systems (for example, Compliance-Based Intervention Scheme (DAFF 2025d)) that monitor regulatory activities, supported by regular performance reviews and business plan reporting. External, independent agencies like the ANAO and the Inspector-General also conduct audits and reviews, providing recommendations for improvement. The Biosecurity Group follows frameworks (for example, cargo compliance verification framework) for data collection and analysis. Collected data undergoes internal validation, peer review and executive-level assessment to inform strategic decisions and continuous improvement. Despite this thorough validation, many staff are uncertain about the process for collecting and evaluating regulatory performance data, indicating another understanding gap.

Reports on biosecurity regulatory performance are publicly available through various channels (departmental publications, annual reports, Senate estimates and independent sources) to ensure transparency. For example, the Centre of Excellence for Biosecurity Risk Analysis (CEBRA) report *Evaluating the health of Australia's biosecurity system* (CEBRA 2020) identifies 20 key indicators. The department also publishes its performance measures in its corporate plan and reports on targets in its annual report.

The Inspector-General recognises that, while the department does produce data and reports, the current performance reporting framework does not yet provide a clear picture of regulatory efficiency, effectiveness or credibility in delivering its regulatory obligations. This observation is based on the following facts:

- Data exists, but it is often fragmented, often not centrally accessible and not always linked to clear performance indicators.
- Reports are published, but they may lack interpretive context – that is, they do not always explain what the data means in terms of outcomes or impact.
- Staff uncertainty about systems and processes suggests that internal capability and communication need strengthening.

Finding 11

While the Biosecurity Group has performance monitoring systems and reporting mechanisms, key areas for improvement remain. Significant gaps exist in transparency and staff knowledge about how regulatory performance is tracked and evaluated.

To bridge this gap and improve overall effectiveness, the department should:

- improve understanding of regulatory performance and monitoring systems
- establish a centralised resource that provides a comprehensive overview of the biosecurity system's performance
- address the ANAO's recommendations by developing a robust performance framework.

7.5.3 Governance and oversight: Developing

'Governance and oversight' refers to the systems and institutions that ensure an agency is well managed, accountable, ethical and transparent.

The department's governance and oversight is at a 'developing' level of maturity. At this maturity level, agencies ensure staff and leaders are regularly informed about core values, public service obligations, ethical expectations and the organisation's role as a regulator. They have systems for risk management, staff performance and sound decision-making, although uniformity may vary. Leaders actively scan for and respond to risks; and a project management office provides tools, training and guidance. Dedicated resources are allocated to build a comprehensive regulatory assurance framework to monitor regulatory practice and decision-making consistency.

The Biosecurity Group has a solid foundation in governance and oversight, with established frameworks, risk management and tools for decision-making and compliance. However, to achieve a fully consistent and transparent approach across divisions, there are still areas that require attention. Defining roles, managing risks and monitoring performance are noteworthy. However, refining the formal governance framework is a key area for improvement. This is a potential weakness in the current biosecurity governance, which exposes Australia to the following risks:

- *Fragmented oversight across divisions*: While the department has a centralised governance body – the Regulatory Practice Committee – oversight remains siloed within individual divisions across Biosecurity Group. This leads to inconsistent practices, unclear accountability and limited strategic alignment across the biosecurity system. This is a systemic issue that has also been captured in several previously published reports (for example, IGB 2021a).
- *Policy coherence risks*: Siloed practices and decision-making within divisions can result in misaligned policies across key biosecurity pathways (for example, cargo, mail and travellers). This undermines the department's ability to deliver harmonised regulatory responses and leaves gaps in coverage and capability.
- *Increased exposure to biosecurity incursions*: The lack of integrated oversight and strategic coordination increases Australia's vulnerability to pest, weed and disease incursions. Without a unified approach to identifying, prioritising and resourcing strategic risks, the system may fail to respond effectively to emerging threats.
- *Limited whole-of-government engagement*: Current governance arrangements focus primarily on internal reporting and escalation. There is limited evidence of mechanisms for engaging other departments, jurisdictions or external stakeholders in biosecurity governance. This constrains the department's ability to respond to complex, cross-sectoral biosecurity challenges that require coordinated national action.

Addressing these will strengthen oversight, ensuring greater consistency, clarity and accountability as a biosecurity regulator and consolidating the department's role as an effective regulator (Recommendation 2).

Recommendation 2

The department should establish a clear, robust and enduring governance framework for regulatory stewardship, ensuring that critical functions (such as consistent capability uplift, policy coherence and whole-of-government representation) – originally intended for the department's Chief Regulatory Officer role – are comprehensively and accountably managed, regardless of specific role titles or departmental restructures.

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

The department is committed to progressing a more robust governance framework to underpin effective regulatory stewardship.

Recognising that regulatory responsibility is shared throughout the department, effective collaboration and interconnected leadership is necessary to ensure dispersed expertise and accountability are harnessed from across the department. The Deputy Secretary oversight group will provide clear leadership and ultimately be accountable for integrated outcomes. This group and the RPC (with its refreshed work plan) will provide the department's primary governance mechanism to deliver whole-of-department regulatory leadership and stewardship.

This specific regulatory governance will also report to other departmental corporate Senior Executive Service (SES) governance, as appropriate. The RPC is embedded in the department's corporate SES governance (as a tier 3 committee). The RPC will ensure that regulatory activities are aligned with strategic objectives and that coordinated efforts are maintained across critical functions such as capability uplift, policy coherence, and whole-of-government representation. Moving forward, the department considers this will be the most effective, fit for purpose, approach to its governance of regulatory stewardship.

In addition to the RPC, the Biosecurity, Operations and Compliance Group (BOCG) is implementing a refreshed operating model that will facilitate enhanced situational awareness and coordination across divisions. This model will enable more cohesive reporting on activities, provide a better view of collective risks and resources, and strengthen our ability to manage biosecurity risks effectively.

These initiatives reflect the department's ongoing commitment to regulatory improvement, and the delivery of coordinated outcomes for Australia's biosecurity system.

8 Continuous improvement of the department's regulatory maturity

The department's biosecurity regulatory system has been the subject of multiple internal and external reviews, all of which have consistently identified the need for significant improvement in its maturity. Despite various reform efforts, progress has been incremental and often fragmented, underscoring the need for a more structured and enduring approach to regulatory uplift.

Future biosecurity challenges will be characterised by increasing complexity, global interdependencies and rapidly evolving biosecurity threats. To meet these challenges, the department must commit to a sustained program of continuous improvement. This program should be led by the Biosecurity, Operations and Compliance Group and embedded across all levels of the organisation, from strategic leadership to frontline operations.

8.1 Strategic imperative

A mature regulatory system is not only a cornerstone of effective biosecurity management but also a prerequisite for maintaining public trust, supporting trade and ensuring environmental protection. The department must transition from reactive, ad-hoc improvements to a proactive, intelligence-led model of regulatory stewardship. This requires a cultural shift supported by robust governance, clear accountability and consistent application of best practice frameworks (Recommendation 3).

Recommendation 3

The department should develop and implement an ongoing program to improve the maturity of its biosecurity regulatory system. This program should be underpinned by a formal framework and methodology, such as those outlined in this review, and aligned with broader public sector regulatory reform initiatives.

Given the scale and complexity of the work required, it is recommended that the department adopt a phased approach, focusing on 3 prioritised attributes each year. This will allow for targeted investment, measurable progress and adaptive learning. The initial focus should be on the following foundational attributes:

- *Organisational culture and leadership focus* – encompasses the values, behaviours and strategic priorities that shape how biosecurity is understood and enacted across the department
- *Regulatory assurance function and review* – ensures that regulatory activities are effective, consistent and transparent.
- *Governance and oversight* – needed to support strategic alignment and cross-agency collaboration.

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

The department is committed to continuously improving its performance, capability and culture, and recognises that strong leadership, governance, monitoring, and reporting is important in ensuring effective regulatory stewardship.

Our biosecurity regulatory system is already supported by a matrix of activities addressing regulatory strategy and design, regulator capability and knowledge management and regulatory assurance and reporting. These are supported by robust governance mechanisms within the department's BOCG, and there is opportunity to further leverage the activities through the Deputy Secretary oversight group, and the RPC and its work plan.

The department is currently evaluating the most suitable approach to assess the maturity of its biosecurity regulatory systems, noting the system is a national one that encompasses state and territory government, industry and other stakeholders. In doing so, the department notes the Department of Finance's regulatory maturity assessment framework and tool for use by Australian Government agencies. Outcomes of this evaluation will guide our approach and ensure alignment to broader public sector reforms.

8.2 Implementation considerations

To ensure success, the program should:

- be supported by clear governance arrangements and resourcing commitments
- include mechanisms for staff engagement, capability building and knowledge sharing
- be informed by data and insights from monitoring systems, stakeholder feedback and regulatory performance metrics
- be reviewed annually to assess progress, recalibrate priorities and incorporate lessons learned.

This approach will position the department to respond more effectively to emerging biosecurity threats, meet its regulatory obligations and deliver on its strategic objectives with greater confidence and agility.

9 Conclusion

The assessment of the department's biosecurity regulatory system shows a clear narrative: there is a strong strategic foundation, but practical and cultural challenges impede execution. The system is in a developmental phase, with pockets of maturity offset by areas that are still in their infancy.

At the core, the system's 'vision, role and strategy' shows the most promise, anchored by a 'well established' corporate plan. This indicates a clear understanding of the department's purpose and contribution to the broader government agenda. However, this strength is diluted by a 'developing' risk-based regulatory approach and an 'emerging' problem-solving methodology. This suggests that the strategy is well defined, but the application is less mature.

The picture for 'leadership and culture' is mixed but leaning towards 'developing'. While the regulatory philosophy is 'maturing', pointing to a growing understanding of its role, the foundational elements of organisational culture, leadership focus and stakeholder engagement are still 'developing'. This suggests that, while the guiding principles are advancing, the internal culture and external relationships required to fully support them are lagging.

The assessment revealed more significant concerns for 'capability and improvement'. The ratings for this attribute are predominantly 'emerging' and 'developing'. The capability framework for regulatory officers is still in a 'developing' stage and, more critically, the functions for regulatory assurance and learning from others are merely 'emerging'. This points to a system that is not yet equipped with the robust skills, self-assessment mechanisms and collaborative learning processes needed for continuous improvement and to ensure its actions are effective.

Finally, 'governance and delivery' is uniformly assessed as 'developing'. This highlights systemic weaknesses in the way the authority carries out its day-to-day activities, its visibility, its performance reporting and its overarching governance and oversight. The consistent 'developing' rating in this characteristic indicates that the fundamental processes for execution and accountability are not yet fully effective or mature.

In essence, the system has a clear purpose but needs stronger culture, capability and governance to deliver consistently. The journey towards full maturity will require a concerted effort to move key areas from an 'emerging' and 'developing' state to one that is consistently 'maturing' and 'well established'.

The Inspector-General has made recommendations to improve the biosecurity regulatory management framework and its ability to deal with ongoing and emerging challenges. Long-term adequate resourcing will be a key success factor in this endeavour.

Appendix A: Agency response

OFFICIAL

Australian Government
Department of Agriculture, Fisheries and Forestry

JUSTINE SAUNDERS APM
ACTING SECRETARY

Dr Lloyd Klumpp
Inspector-General of Biosecurity (IGB)
c/o Department of Agriculture, Fisheries and Forestry
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Email: Lloyd.Klumpp@aff.gov.au

Dear Dr Klumpp,

Thank you for your correspondence of 29 August 2025 providing your draft review report, *Maturity of the department's biosecurity regulatory system.*

I appreciate the insights provided through this review and acknowledge the findings and recommendations outlined in your report.

My formal response to each of your recommendations is at **Attachment A**. I acknowledge all three recommendations and the important considerations they raise.

I appreciate that there have been several external reviews, including by a former IGB recommending improvements to uplift the department's regulatory maturity. I also acknowledge that the department has previously adopted differing models and reforms for driving enterprise regulatory uplift and maturity.

I confirm that the department is strongly committed to enhanced regulatory leadership and frameworks to support the ongoing improvement, and strength, of the biosecurity regulatory system. I welcome the opportunity to leverage your recommendations to support improving our biosecurity regulatory maturity through our ongoing efforts.

We are strengthening existing enterprise-wide regulatory governance structures, mechanisms and maturity efforts to deliver integrated, tangible and sustained improvements. The department will ensure that, where appropriate, enhancements are implemented effectively to support intended outcomes.

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

Thank you for your review and report.

Kind regards,

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

26 September 2025

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Attachment A: Department of Agriculture, Fisheries and Forestry – response to the Inspector-General of Biosecurity report: *Maturity of the department's biosecurity regulatory system.*

Recommendation 1
The department must break the cycle of fragmented reform by immediately prioritising and committing to a sustained, full implementation of a single, overarching regulatory maturity program. This program should integrate the best elements of previous initiatives in relation to, for example, digital transformation, continuous improvement, staff empowerment and be explicitly endorsed and championed at the highest levels of the department.

Department response
The department accepts in principle the recommendation.

The department is committed to prioritising and delivering an ongoing regulatory maturity program, to build trust and confidence in our regulatory settings. This will integrate effective elements and learnings from past successes and challenges to refine our systems and processes.

The department's Deputy Secretaries will form a new regulatory stewardship oversight group to provide strong leadership in overseeing whole-of-department regulatory maturity and performance uplift. This group will agree key priorities and set the annual work plan of the department's Regulatory Practice Committee (RPC), which consists of the department's First Assistant Secretary regulatory leaders. The RPC work plan will establish clear expectations, set the organisation's priorities for regulatory maturity, and will provide a cohesive and enduring framework of improvement. The establishment of the RPC's 2026 work plan, which will be pragmatic and implementable, and commensurate to funding and resourcing, will be settled by December 2025. This approach to integrated governance will ensure clear prioritises, strong accountability and implementation, and a coordinated, long-term commitment to regulatory maturity.

Recommendation 2
The department should establish a clear, robust and enduring governance framework for regulatory stewardship, ensuring that critical functions (such as consistent capability uplift, policy coherence and whole-of-government representation)—originally intended for the department's Chief Regulatory Officer role—are comprehensively and accountably managed.

Department response
The department accepts in principle the recommendation.

The department is committed to progressing a more robust governance framework to underpin effective regulatory stewardship.

Recognising that regulatory responsibility is shared throughout the department, effective collaboration and interconnected leadership is necessary to ensure dispersed expertise and accountability are harnessed from across the department. The Deputy Secretary oversight group will provide clear leadership and ultimately be accountable for integrated outcomes. This group and the RPC (with its refreshed work plan) will provide the department's primary governance mechanism to deliver whole-of-department regulatory leadership and stewardship.

This specific regulatory governance will also report to other departmental corporate Senior Executive Service (SES) governance, as appropriate. The RPC is embedded in the department's corporate SES governance (as a tier 3 committee). The RPC will ensure that regulatory activities are aligned with strategic objectives and that coordinated efforts are maintained across critical functions such as capability uplift, policy coherence, and whole-of-government representation. Moving forward, the

department considers this will be the most effective, fit for purpose, approach to its governance of regulatory stewardship.

In addition to the RPC, the Biosecurity, Operations and Compliance Group (BOCG) is implementing a refreshed operating model that will facilitate enhanced situational awareness and coordination across divisions. This model will enable more cohesive reporting on activities, provide a better view of collective risks and resources, and strengthen our ability to manage biosecurity risks effectively.

These initiatives reflect the department's ongoing commitment to regulatory improvement, and the delivery of coordinated outcomes for Australia's biosecurity system.

Recommendation 3
The department should develop and implement an ongoing program to improve the maturity of its biosecurity regulatory system. This program should be underpinned by a formal framework and methodology, such as those outlined in this review, and aligned with broader public sector regulatory reform initiatives.

Given the scale and complexity of the work required, it is recommended that the department adopt a phased approach, focusing on 3 prioritised attributes each year. This will allow for targeted investment, measurable progress and adaptive learning. The initial focus should be on the following foundational attributes:

- *Organisational culture and leadership focus—encompasses the values, behaviours and strategic priorities that shape how biosecurity is understood and enacted across the department*
- *Regulatory assurance function and review—ensures that regulatory activities are effective, consistent and transparent.*
- *Governance and oversight—needed to support strategic alignment and cross-agency collaboration.*

Department response
The department accepts in principle the recommendation.

The department is committed to continuously improving its performance, capability and culture, and recognises that strong leadership, governance, monitoring, and reporting is important in ensuring effective regulatory stewardship.

Our biosecurity regulatory system is already supported by a matrix of activities addressing regulatory strategy and design, regulator capability and knowledge management and regulatory assurance and reporting. These are supported by robust governance mechanisms within the department's BOCG, and there is opportunity to further leverage the activities through the Deputy Secretary oversight group, and the RPC and its work plan.

The department is currently evaluating the most suitable approach to assess the maturity of its biosecurity regulatory systems, noting the system is a national one that encompasses state and territory government, industry and other stakeholders. In doing so, the department notes the Department of Finance's regulatory maturity assessment framework and tool for use by Australian Government agencies. Outcomes of this evaluation will guide our approach and ensure alignment to broader public sector reforms.

Appendix B: Biosecurity regulatory maturity assessment tool

The following provides a very detailed survey, which would be burdensome to use for assessment of all attributes at every assessment. The Inspector-General recommends that the department take a staged approach to improving each attribute – for example, as other agencies have done, focus on 3 attributes per year in a 4-year cycle of assessment and improvement.

A. Leadership and culture	
1. Organisational culture and leadership focus	1. Describe the organisation's approach towards establishing a clear vision and strategy to deliver its regulatory objectives?
	2. Does your organisation have a clear set of values, specific to the organisation's function, described in its strategic documents?
	3. Explain how your organisation engages with staff to ensure they understand and support the vision, strategy and priorities for delivery of your division's regulatory objectives.
	4. How do leaders communicate priorities and expectations to staff?
	5. Does the department encourage a culture of shared responsibility across the biosecurity system?
	6. Are leadership actions assessed for their impact on biosecurity initiatives and biosecurity culture?
	7. Is there engagement with stakeholders, industry representatives and the public to reinforce the importance of your regulatory responsibilities?
	8. Do leaders actively seek input from diverse stakeholders?
	9. Are there mechanisms for collaboration across sectors and jurisdictions?
	10. Are leaders well-informed about biosecurity risks and their potential impact?
	11. Are decisions based on risk assessments and prioritise regulatory activities accordingly?
	12. Do leaders adapt to changing biosecurity challenges?
	13. Are innovative approaches adopted to improve the biosecurity regulatory system?
	14. Does leadership invest in training programs to enhance biosecurity knowledge and skills?
	15. Are there opportunities for professional development and capacity building?
2. Regulatory philosophy and approach	1. Does the department have a regulatory philosophy with regards to the biosecurity regulatory system? Is it formal or informal/published internally or externally or both? (If in existence) Does the biosecurity system's regulatory philosophy align with national or regional biosecurity objectives?
	2. Is there a clear vision for how the system contributes to overall biosecurity resilience?
	3. Does the system prioritise risks based on their potential impact/consequences?
	4. Are risk assessments conducted regularly to inform regulatory decisions?
	5. Are stakeholders informed about regulatory changes and their rationale?
	6. Can the regulatory approach adapt to emerging threats or changing circumstances?
	7. Is there a process for reviewing and updating regulatory frameworks?

	8. Is the legislation enforced?
	9. Is there a balance between compliance and penalties?
	10. Are regulatory decisions informed by (scientific and other) evidence?
	11. Is there a feedback loop to learn from past experiences and adjust the approach?
3. Stakeholder and community engagement	1. Are all relevant stakeholders and community groups adequately represented in the biosecurity decision-making processes?
	2. Are joint biosecurity initiatives and shared responsibilities encouraged?
	3. Is there a mechanism to ensure equitable participation when engaging with stakeholders and the community on biosecurity matters?
	4. Are there formal partnerships with relevant organisations, agencies and community groups?
	5. Do stakeholders collaborate to address biosecurity challenges?
	6. Is the department transparent in sharing information about the biosecurity system with stakeholders and the community?
	7. Are communication channels for biosecurity related matters accessible and effective?
	8. Is there a clear process for disseminating critical information during emergencies?
	9. Are efforts made to enhance stakeholders' understanding of biosecurity issues?
	10. Are training programs, workshops or awareness campaigns conducted?
	11. Does the department collect feedback about the biosecurity system from stakeholders and the community?
	12. Is feedback actively used to improve biosecurity policies and practices?
	13. Does the department have the capability to learn and adapt its biosecurity engagement strategies based on stakeholder needs, community dynamics, feedback and past experiences?
	14. Is there flexibility to modify engagement strategies based on feedback and emerging challenges?
	15. Does the system learn from past experiences?
	16. Does the department gain and gather feedback from stakeholders to contribute to its policies and procedures and mature as a regulator?
B. Vision, role and strategy	
4. Corporate plan and contribution	1. Does the department have a current Corporate Plan?
	2. Does the corporate plan identify key biosecurity risks and vulnerabilities?
	3. Does the corporate plan align with these broader strategic goals of the biosecurity system?
	4. Does the corporate plan contain/detail the broader overall vision for biosecurity?
	5. Does the corporate plan accommodate changes in the biosecurity landscape?
	6. Does the corporate plan have a mechanism to be updated based on emerging threats or new information?
	7. Is the corporate plan integrated with other relevant biosecurity strategies?
	8. Does the corporate plan complement national and regional biosecurity policies?
	9. Were stakeholders involved in developing the corporate plan?
	10. Does the corporate plan detail strategies for mitigating these risks?

	11. Is the corporate plan communicated to stakeholders and the public?
	12. Are roles and responsibilities clearly defined within the corporate plan?
	13. Are there measurable performance indicators outlined in the corporate plan?
	14. Is progress tracked and evaluated against these metrics?
	15. Is the department resourced to undertake the work detailed in the Corporate plan?
	16. Does the department have a documented risk assessment process?
5. Risk-based regulatory approach	1. Does the department have a structured approach to assess risks related to biosecurity?
	2. Are risk factors considered, such as the likelihood of noncompliance, impact on stakeholders and potential harm to the environment or trade?
	3. Are stakeholders involved in undertaking biosecurity risk assessments?
	4. Is there a process for prioritising biosecurity compliance efforts based on biosecurity risk severity?
	5. Is there a mechanism for updating risk assessments or compliance plans based on emerging threats or new information?
	6. Does the department have a documented compliance plan?
	7. Are biosecurity compliance objectives and priorities well defined?
	8. Have key biosecurity risks and vulnerabilities been identified?
	9. Are there defined goals and clear priorities for determining regulatory effort across the biosecurity system?
	10. Are compliance strategies adaptable and flexible?
	11. Is there a robust reporting and monitoring framework?
	12. Are roles and responsibilities clearly defined within the compliance plan?
	13. How will progress be monitored and who is accountable for its successful execution?
	14. Are biosecurity risks and vulnerabilities communicated with stakeholders?
	15. Is there a strategy for raising awareness about its importance and implementation?
	16. Does the department have a documented risk assessment process?
	17. Does the department adapt to changing biosecurity threats and challenges?
6. Problem-solving approach	1. Is there a mechanism for promptly addressing emerging biosecurity issues?
	2. Does the department encourage flexibility in resource allocation based on biosecurity priorities?
	3. Is there a coordinated approach to problem-solving?
	4. Are problem-solving techniques embedded in daily operations?
	5. Is there a culture of continuous improvement for problem solving?
	6. Does the department prioritise problems based on their impact and likelihood?
	7. Does the department delve into the underlying causes of biosecurity problems?
	8. Does the department incorporate lessons learned into future problem-solving approaches?
	9. Are efforts focused on addressing symptoms or fundamental issues?
	10. Are decisions supported by scientific evidence and data?

	11. Is there a feedback mechanism to learn from past experiences?
	12. Are problem-solving processes transparent and accessible to stakeholders?
	13. Is accountability ensured for implementing solutions?
	14. Is accountability ensured for implementing solutions?
C. Capability and improvement	
7. Regulatory officer capability framework and function	1. Are procedures consistent with the desired outcomes for biosecurity?
	2. Are procedures relevant to the specific biosecurity risks and challenges faced?
	3. Are training resources accessible to relevant stakeholders (for example, staff, industry, community)?
	4. Is there a variety of delivery methods for biosecurity training and procedures (for example, online, workshops, on-site training)?
	5. Is the quality of biosecurity training content and delivery assessed?
	6. Are there mechanisms for evaluating the effectiveness of biosecurity training programs?
	7. Are biosecurity training materials reviewed and updated?
	8. Is there a process for incorporating new information or emerging biosecurity threats into training materials and procedures?
	9. Are biosecurity procedures standardised across different regions or sectors?
	10. Is there consistency in biosecurity training content and delivery?
	11. Is there a feedback mechanism for participants to provide input on biosecurity training effectiveness?
	12. Are lessons learned from biosecurity incidents or exercises integrated into training improvements?
	13. Is there a review program for the (departments) biosecurity regulatory system?
8. Regulatory assurance function and review	1. (If there is a review program)...Is there an established framework or guideline for conducting a review? How often are reviews conducted?
	2. (If reviews are conducted) Are reviews based on risk?
	3. Is the system capable of and does it identify emerging risks?
	4. Are stakeholders (both internal and external) involved in the review process?
	5. Is there a mechanism for stakeholders to provide feedback on the effectiveness of quality assurance measures?
	6. Are key performance indicators (KPIs) used to measure the effectiveness of quality assurance processes?
	7. Are KPI metrics tracked, analysed and reported?
	8. Is there a culture of continuous improvement within the biosecurity system?
	9. Are lessons learned from reviews incorporated into process enhancements?
	10. Are quality assurance reviews closely integrated with risk management processes?
	11. Are risk assessments used to inform the scope and focus of reviews?
	12. Is quality assurance and review resourced adequately?
	13. Does the system balance resource allocation between prevention, detection and response?

	14. Is the review process transparent? Are findings and recommendations shared openly?
	15. Does the department ensure a SRO (or similar) is accountable for implementing recommended changes?
	16. Are corrective actions taken promptly based on review findings?
	17. Does the system adapt its review approach to changing biosecurity contexts, technologies and threats?
	18. Does the department collaborate with other organisations, agencies and stakeholders with regards to biosecurity issues?
9. Learning and growing with others	1. Are there formal partnerships or networks in place to share information, best practices and lessons learned?
	2. Do mechanisms exist for sharing knowledge and experiences across different biosecurity domains?
	3. Are there platforms (such as workshops, conferences, or online forums) where practitioners can learn from each other?
	4. Does the system encourage learning beyond its own sector? For example, does it engage with related fields like public health, environmental conservation or agriculture?
	5. Does the department adapt insights from other sectors to enhance biosecurity practices?
	6. Are there structured processes for reviewing incidents, outbreaks or emergencies?
	7. Are lessons learned from incidents, outbreaks and emergencies incorporated in strategies and processes to mitigate future events?
	8. Does the department have training programs to enhance the skills and knowledge of biosecurity professionals?
	9. Is there a focus on continuous learning and professional development?
	10. Is there an active community of practice where experts, practitioners and researchers can exchange ideas and experiences?
	11. Does this community foster a culture of learning and mutual support?
	12. Does the department's biosecurity system compare its practices with those of other countries or regions?
	13. Does the department learn from successful biosecurity approaches elsewhere?
	14. Does the department gain and gather feedback from stakeholders to contribute to its policies and procedures and mature as a regulator?
	15. Is feedback actively used to improve processes and policies?
	16. Does the department adopt innovative technologies, research findings and evidence-based practices?
	17. Is there a process for translating research into practical applications?
	18. Does the department learn from both successes and failures?
	19. Does the department learn from both successes and failures?

D. Governance and delivery	
10. Activity and visibility	1. Are regulatory activities and processes transparent?
	2. Is there clear documentation of actions taken, decisions made and outcomes achieved?
	3. Are biosecurity noncompliances reported and tracked?
	4. Is there a centralised system to record noncompliances, investigations and responses?
	5. Are stakeholders informed about ongoing activities and regulator performance?
	6. Are specific channels established for disseminating information related to biosecurity regulatory activities?
	7. Is there a mechanism for timely alerts and updates?
	8. Are educational campaigns conducted to raise awareness of biosecurity risks/threats/ incidents?
	9. Is there collaboration with media and community organisations?
	10. Are joint exercises and drills conducted to enhance visibility and coordination in the biosecurity sphere?
	11. Is there a mechanism for sharing best practices with other relevant stakeholders?
	12. Are trends analysed to identify areas for improvement?
	13. Is there real-time reporting of events?
	14. Are there established metrics to measure the effectiveness of biosecurity regulatory activities?
	15. Is there a regular reporting cycle for performance evaluation?
	16. Are key performance indicators (KPIs) aligned with visibility goals?
	17. Is there a well-defined process for monitoring regulatory activities and outcomes
11. Performance reporting	1. How does the department report on regulatory performance indicators?
	2. Is there a mechanism to identify gaps or deficiencies in regulatory performance?
	3. Are performance reports accessible to stakeholders and the public?
	4. Is there a feedback loop for continuous improvement based on performance data?
	5. Is there a well-defined framework for collecting and analysing regulatory performance data?
	6. Are performance indicators aligned with regulatory objectives and priorities?
	7. Is there a regular reporting cycle established?
	8. Are performance reports comprehensive and transparent?
	9. Is there a mechanism to validate reported data?
	10. Are performance targets challenging yet achievable?
	11. Is there a process for learning from performance gaps and improving performance?
	12. Is there a clear governance structure in place for management of the biosecurity regulatory system?

12. Governance and oversight	1. Is there a designated individual or senior responsible officer (SRO) that holds ultimate responsibility for biosecurity decisions and outcomes?
	2. Are decision-making roles and responsibilities well-defined and well communicated?
	3. Are the organisation's policies and procedures regularly reviewed and updated?
	4. Is there a mechanism to ensure consistency across different levels of governance?
	5. Are significant risks to the regulatory system identified, evaluated, managed and reported to a Board/management committee and/or audit and risk Committee?
	6. Is there a transparent process for decision-making related to biosecurity measures?
	7. Are risk assessments evidence-based and scientifically rigorous?
	8. Are stakeholders involved in governance in any way?
	9. Is there a mechanism for feedback and collaboration?
	10. Are there mechanisms to address conflicting interests among stakeholders?
	11. Is biosecurity legislation enforced?
	12. Are penalties proportionate and consistently applied?
	13. Is there a system for monitoring compliance and addressing noncompliance with the organisation's policies and procedures?
	14. Are personnel adequately trained in biosecurity protocols?
	15. Is there ongoing professional development for staff involved in oversight?
	16. Is knowledge shared across different levels of governance?
	17. Is the effectiveness of biosecurity oversight measured?
	18. Are performance indicators established and regularly monitored?
	19. Is there a reporting mechanism to communicate progress and challenges?

Appendix C: Have Your Say survey questionnaire

A. Leadership and culture	
1. Organisational culture and leadership focus	1. Describe your division's approach towards establishing a clear vision and strategy to deliver its regulatory objectives?
	2. Explain how your division engages with staff to ensure they understand and support the vision, strategy and priorities for delivery of your division's regulatory objectives.
	3. Does your organisation have a clear set of values, specific to the organisation's function, described in its strategic documents?
	4. How does the divisional leadership team go about making effective regulatory decisions that make your regulatory system adaptive and successful given the continuous (potentially disruptive) changes in the operating environment? How are those decisions communicated?
	5. Are leadership actions assessed for their impact on organisational culture and the workings of the divisional regulatory system? If so, how?
2. Regulatory philosophy and approach	6. Does the division have a regulatory philosophy with regards to the biosecurity regulatory system? Is it formal or informal/published internally or externally or both?
	7. How would your staff know and embody the regulatory posture? Has the tension between facilitation and regulation been resolved?
	8. Is there a feedback loop to learn from past experiences and adjust the approach?
3. Stakeholder and community engagement	9. Do leaders in your division actively seek input into strategic decision-making from diverse stakeholders? If so, how?
	10. How are relevant stakeholders and community groups represented in the decision-making processes?
	11. Are joint biosecurity initiatives and shared responsibilities encouraged? If so, how?
	12. Does the division collect feedback about the biosecurity system from stakeholders and the community? Does the division gain and gather feedback from stakeholders to contribute to its policies and procedures as a regulator?
B. Vision, role and strategy	
4. Corporate plan and contribution	13. Does your business plan align with the division's corporate plan?
	14. How does it align with the broader strategic goals of the national biosecurity system?
	15. Does the business plan have a mechanism to be updated based on emerging threats or new information?
	16. Are there defined goals and clear priorities for determining regulatory effort? If so, are these goals and priorities communicated with staff?
5. Risk-based regulatory approach	17. Does your division have a documented risk assessment process for regulatory decision-making?
	18. Are risk factors, such as the likelihood of noncompliance, impact on stakeholders and potential harm to biosecurity or trade, considered?
	19. Is there a process for prioritising compliance efforts based on biosecurity risk assessments?
	20. Is there a mechanism for updating risk assessments or compliance plans based on emerging threats or new information?

6. Problem-solving approach	21. Is there a mechanism for promptly addressing emerging or persistent issues?
	22. Are problem-solving techniques embedded in daily operations? If so, how?
	23. Does the division prioritise problems based on their impact and likelihood?
	24. Does the division delve into the underlying causes of biosecurity problems?
	25. Does the division incorporate lessons learned into future problem-solving approaches?
C. Capability and improvement	
7. Regulatory officer capability framework and function	26. Do you have a formal learning and development system for staff?
	27. Is there a dedicated training budget in place?
	28. Are there documented policies and procedures for training programmes?
	29. What training delivery methods are used?
	30. How are staff capabilities assessed during and after training?
8. Regulatory assurance function and review	31. What quality assurance mechanisms are in place for the regulatory system?
	32. Is there a current review program in place for your regulatory responsibilities?
	33. How is the review program resourced?
	34. If a program exists, how is it decided what reviews are undertaken?
	35. Are there established and documented processes for conducting reviews?
	36. Are stakeholders (both internal and external involved in the review?
9. Learning and growing with others	37. Does your division participate in formal partnerships or networks with other regulatory agencies to share information, best practices and lessons learned?
	38. Does the division adapt insights from other sectors to enhance biosecurity regulatory practices? How?
	39. Do mechanisms exist for sharing knowledge and experiences across different biosecurity domains?
	40. Does the division gain and gather feedback from stakeholders to contribute to its policies and procedures?
D. Governance and delivery	
10. Activity and visibility	41. How do you plan and prioritise regulatory activities?
	42. What regulatory tools are used to achieve the objectives of the Biosecurity Act?
	43. Is there clear documentation of actions taken, decisions made and outcomes achieved?
	44. Are stakeholders informed about ongoing activities and regulator performance?
11. Performance reporting	45. Describe the process for monitoring regulatory activities and outcomes in your division?
	46. Are performance reports accessible to stakeholders and the public?
	47. Is there a well-defined framework for collecting and analysing regulatory performance data?
	48. How is any performance data that is collected validated and used?
12. Governance and oversight	49. Are decision-making roles and responsibilities well-defined and well communicated?
	50. Is there a mechanism to ensure consistency of decision-making across different levels of governance?
	51. Are significant risks to the regulatory system identified, evaluated, managed and reported to a board/management committee and/or audit and risk committee?
	52. Is there a system for monitoring compliance and addressing noncompliance with divisional policies and procedures?
	53. Is there a reporting mechanism to communicate progress and challenges?
	54. Do you believe that the division is complying with the department's governance framework regarding information management and good record keeping practises? If so, what is the evidence?

Glossary and acronyms

Term	Definition
ABARES	Australian Bureau of Agricultural and Resource Economics and Sciences; a research division within the Department of Agriculture, Fisheries and Forestry providing economic and scientific advice.
ABF	Australian Border Force; responsible for border enforcement, which intersects with biosecurity at ports and airports.
Activity and visibility	The extent to which a regulator's role, actions and results are visible, understood and trusted by stakeholders and the public.
Approved Arrangement	A formal arrangement under the Biosecurity Act 2015 that permits an entity to manage certain biosecurity risks under specified conditions.
AELERT	Australasian Environmental Law Enforcement and Regulators Network; a professional network that developed the Modern Regulator Improvement Tool (MRIT).
ANAO	Australian National Audit Office; conducts performance and financial audits of Commonwealth entities, including the department.
APS	Australian Public Service.
APSC Capability Review	An Australian Public Service Commission review program assessing departmental capability and recommending uplift actions.
Biosecurity 2030 Roadmap	The department's strategic roadmap (replacing Commonwealth Biosecurity 2030) to guide biosecurity priorities to 2030.
Biosecurity Act 2015	The principal Commonwealth legislation for managing biosecurity risks associated with goods, conveyances and people entering Australia.
Biosecurity continuum	The three stages at which biosecurity risk is managed: preborder, at-border and postborder.
Biosecurity Group	The collective of DAFF divisions responsible for biosecurity strategy, operations, compliance and enforcement.
Biosecurity Regulation 2016	Subordinate legislation supporting the Biosecurity Act, including detailed operational requirements and enforcement mechanisms.
CEBRA	Centre of Excellence for Biosecurity Risk Analysis (University of Melbourne); provides research and performance indicators for biosecurity.
Compliance-Based Intervention Scheme	A model that adjusts regulatory intervention based on demonstrated compliance.
Corporate plan (departmental)	The statutory plan setting the department's objectives, measures and activities, and aligning them with government priorities.
Deregulation Agenda	Australian Government program to reduce unnecessary regulatory burden and improve regulator performance.
Director of Biosecurity	The statutory position responsible for administering the Biosecurity Act; held by the Secretary of the Department of Agriculture, Fisheries and Forestry.
Division (departmental)	An organisational unit within the department (for example, Biosecurity Operations Division) accountable for policy and operational delivery.

EL1/EL2	Executive Level classifications in the Australian Public Service (APS) above APS Levels and below SES, typically managerial or specialist roles.
Evidencebased regulation	Regulation informed by data, research and evaluation to ensure decisions are lawful, proportionate and effective.
Frontline	Staff delivering ontheground regulatory functions (for example, inspections, clearances, enforcement).
Governance and oversight	Systems that ensure a regulator's decisions are accountable, ethical, transparent and consistent across the organisation.
Hitchhiker pests	Pests that arrive incidentally on cargo, conveyances or packaging rather than through intentional import pathways.
Have Your Say survey	The department's consultation platform used to collect staff or stakeholder input; used in this review to gather staff perspectives.
IGB	InspectorGeneral of Biosecurity; an independent statutory officer who reviews and reports on the performance of Australia's biosecurity system.
IGWC	InspectorGeneral of Water Compliance; referenced as another user of the MRIT framework.
Learning and growing with others	A maturity attribute describing how a regulator learns from peer regulators and professional networks to improve practice.
MRIT	Modern Regulator Improvement Tool; a selfassessment tool (AELERT) that evaluates regulatory maturity across 12 attributes grouped into four characteristics.
National Biosecurity Communication and Engagement Strategy	The national framework guiding consistent engagement and communication on biosecurity issues.
National Biosecurity Strategy	Australia's 10-year strategy (first released in 2022) that sets national biosecurity priorities and coordination arrangements.
Noncompliance	Failure to meet a legislative or regulatory requirement; may trigger education, remedial action, civil penalty or prosecution.
OCRO	Office of the Chief Regulatory Officer; a DAFF office established in 2024 to uplift regulatory maturity; discontinued in 2025 with functions redistributed.
Performance reporting	Systematic collection and use of data to assess regulatory effectiveness and efficiency and to inform decisions.
Postentry quarantine	Quarantine activities undertaken in Australia after goods are released from initial biosecurity control to manage residual risk.
Problemsolving approach	Methods that diagnose root causes and apply targeted, crossfunctional responses, often using agile and continuous improvement practices.
Regulatory assurance	Activities that test whether regulatory systems and decisions are lawful, effective, riskproportionate and consistently applied.
Regulatory Assurance Strategy	DAFF's strategy that sets objectives and principles for internal regulatory assurance across all regulatory systems.
Regulatory maturity	The extent to which a regulator has the organisation, governance, capability and processes to deliver transparent, riskbased, lawful regulation.
Regulatory philosophy and approach	The regulator's guiding principles (for example, prevention first, proportionate response) and how they are applied in practice.
Regulatory posture	The regulator's operating stance (for example, supportive, riskproportionate, firm on serious harm) perceived by stakeholders.

RPC	Regulatory Practice Committee; a departmental governance body overseeing regulatory practice and, currently, implementation of the Regulatory Assurance Strategy.
RPS	Regulatory Practice Statement; the department's public statement of regulatory principles and expectations for delivering regulatory outcomes.
Risk-based regulatory approach	Allocating regulatory effort in proportion to the likelihood and consequence of harm, and the compliance history of entities.
SRO	Senior Responsible Officer; a senior official accountable for achieving the outcomes of a program, project or recommendation.
Transformation Program	The department's enterprise program (from 2023) to strengthen governance, regulatory capability and performance.
Well established (maturity level)	In MRIT, a higher maturity state where systems are embedded and consistently applied (below 'leading', above 'maturing').

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