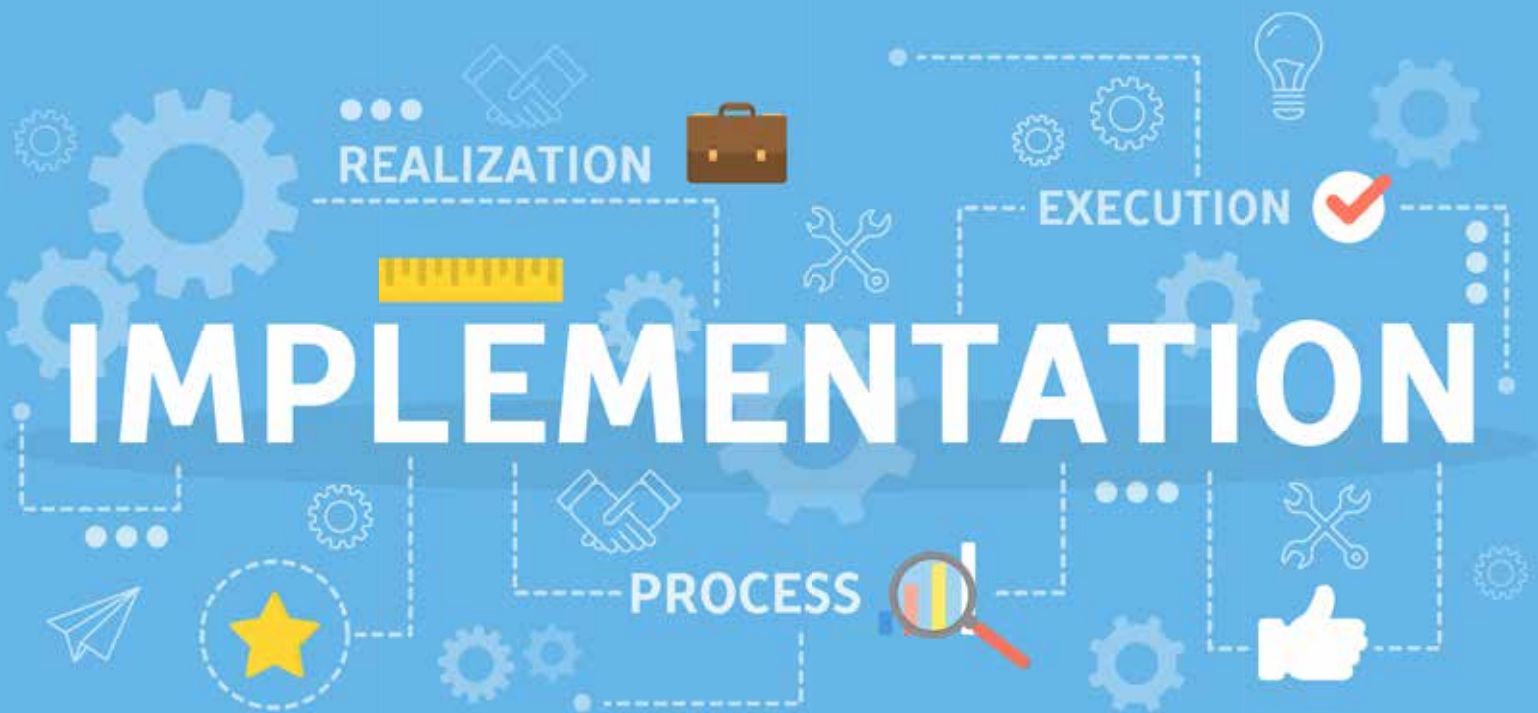




Australian Government
Inspector-General of Biosecurity

Accountable implementation of Inspectors-General of Biosecurity review recommendations (2015–2021)

REVIEW REPORT NO. 2021–22/01



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Images

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Executive summary

The purpose of this review was to assess the Department of Agriculture, Water and the Environment's methods for ensuring that Interim Inspector-General and Inspector-General review findings and recommendations are used to strengthen Australia's biosecurity system. It examined progress in implementing 163 Interim Inspector-General and Inspector-General recommendations to the Director of Biosecurity contained in 15 review reports published between 3 May 2016 and 28 February 2021.

The Inspector-General of Biosecurity is an independent statutory role under the *Biosecurity Act 2015*. The Inspector-General provides independent assessment of and recommendations to the Director of Biosecurity on the performance of biosecurity functions and exercise of powers. The Secretary of the department is the Director of Biosecurity.

This is the fifth review of the department's track record in implementing Interim Inspector-General and Inspectors-General recommendations since 2015. None of these reviews would have been necessary if the department had a well-established commitment to and a sound process for continuous improvement; and appropriate accountability mechanisms within biosecurity divisions and the department more broadly.

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

The Director of Biosecurity has, without exception, responded to Inspector-General review reports as required under the *Biosecurity Act 2015*. However, endemic weaknesses in governance within corporate areas and biosecurity divisions has led to confusion, poor accountability and inefficiency in the handling of advice to the Director of Biosecurity on Inspectors-General recommendations, and lack of accountable and timely implementation of responses to recommendations.

This report makes 10 recommendations for improvements that need to be made to departmental processes and systems to ensure Inspector-General recommendations are addressed in a timely and accountable manner. The recommendations address the current weaknesses in clarity of accountability; timeliness of action; verification of completion; reporting of progress; and integration of Inspector-General recommendations within an overall improvement program.

The Inspector-General is pleased to see the significant improvements in governance for biosecurity divisions made in 2021 through the establishment and operation of the Biosecurity and Compliance Board. There has been a welcome strengthening of project management capability and a more embedded approach to continuous improvement that will address both systemic capability building and issues in specific areas.

The department's corporate areas need to improve related corporate systems – for example, practical tracking and reporting software, integration of improved biosecurity planning, delivery and monitoring of corporate improvements, and timely and actionable reporting to the Director of Biosecurity, directly and via the Portfolio Audit Committee (PAC).

The improvements recommended in this review will enable the department's committed biosecurity workforce to deliver biosecurity functions for our nation with greater effectiveness, consistency, reliability and efficiency.

Recommendations

Recommendation 1

The department needs to identify the root causes hindering full implementation of accepted Inspector-General recommendations. The analysis process should look at themes of similar recommendations to identify potential systemic issues and ways to address them.

Recommendation 2

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

Recommendation 3

The department needs to establish a more clearly understood process to assign accountability for, and track, the implementation of the Inspector-General's recommendations and any other agreed improvements to the biosecurity system. As part of the department's routine response to each Inspector-General review, accountability should be assigned from the time that the advice is provided to the Director of Biosecurity.

Recommendation 4

The department should assign accountability to specific positions (not only to persons) for the implementation of responses to recommendations.

Recommendation 5

An overt commitment to continuous improvement should include, and be demonstrated by, the department engaging and collaborating with relevant industry sectors more constructively and effectively.

Recommendation 6

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

Recommendation 7

The department's internal audit functions should include a process to verify appropriate closure of Inspector-General recommendations, including validating evidence.

Recommendation 8

The department should drive and strengthen accountability throughout the department's biosecurity divisions by utilising annual progress reporting against the strategy Commonwealth Biosecurity 2030, and the implementation status of Inspector-General review recommendations.

Recommendation 9

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

Recommendation 10

The Portfolio Audit Committee should be appropriately supported to enable it to advise the Director of Biosecurity on risks to the department's effective delivery of its biosecurity functions as highlighted through Inspector-General reviews and recommendations, and the timeliness and completeness of the implementation of response to recommendations.



Rob Delane
Inspector-General of Biosecurity

24 November 2021

Chapter 1

Background

1.1 Context

Australia's pre-border and at-border biosecurity controls minimise the risk of exotic pests and diseases entering Australia, thereby protecting the health of the Australian people; our \$32 billion agriculture export industries; our unique environment, native flora and fauna; our tourism industries; and our lifestyle. The Department of Agriculture, Water and the Environment is the lead regulatory agency for managing biosecurity in Australia.

Expansion and diversification in trade and travel have placed significant pressure on the capacity of biosecurity agencies to meet their evolving biosecurity commitments and their ability to optimise their risk mitigation activities with available resources (risk-return). Biosecurity stakeholders, especially those bearing an increasing share of the costs, want a more efficient delivery of contemporary biosecurity services. In addition, major biosecurity incidents continue to test public confidence in the national biosecurity arrangements.

Reviews of national biosecurity arrangements

The Australian Government has supported several major independent reviews of Australia's biosecurity system, including:

- Nairn et al (1996) – a significant benchmark review on transforming Australia's quarantine system that established the concept of 'shared responsibility'
- Callinan (2008) – an equine influenza inquiry report that examined the circumstances which contributed to the outbreak of equine influenza in Australia in August 2007
- Beale et al (2008) – a review that introduced the 'risk-return' model, which helped guide the department to direct scarce resources towards better management of higher risk imported goods and pathways
- Craik et al (2017) – priorities for the Australian biosecurity system – an independent review of the capacity of the national biosecurity system and its underpinning Intergovernmental Agreement on Biosecurity (IGAB).

Statutory office of the Inspector-General of Biosecurity

As part of its response to the *One biosecurity: a working partnership review* (the Beale review) (Beale et al 2008), the Australian Government agreed to establish the statutory office of the Inspector-General of Biosecurity.

In July 2009, while the enabling legislation was being developed, the Australian Government appointed an Interim Inspector-General to evaluate and verify the adequacy of the then Department of Agriculture, Fisheries and Forestry's pre-border, border and post-border biosecurity risk management programs. This role subsumed the Interim Inspector-General of Horse Importation that was recommended by Commissioner Callinan in the 2008 *Report of the Equine Influenza Inquiry* (Callinan 2008).

Between July 2009 and June 2016, two independent officers held the position of Interim Inspector-General. On 16 June 2016 the Australian Government repealed the *Quarantine Act 1908* and commenced administering the *Biosecurity Act 2015* and appointed the inaugural Inspector-General in July 2016. On 25 July 2019 the Australian Government Minister for Agriculture appointed the current Inspector-General.

The Inspector-General is a statutory officer who:

1. independently reviews the Director of Biosecurity's (the department's Secretary) functions and exercise of powers under the *Biosecurity Act 2015*
2. provides impartial and transparent scrutiny of our national biosecurity system by making recommendations to improve the systems and processes used in delivering 'preventative biosecurity' activities across the biosecurity continuum.

Inspector-General review recommendations

Over the years, Inspectors-General review recommendations have driven significant reforms (media releases [2020](#), [2021a](#) and [2021b](#)) to the way the department manages biosecurity. The recommendations have catalysed the department to develop the capabilities Australia needs to meet the challenges posed by changes in the biosecurity operating environment and the increasing size and complexity of the biosecurity task.

Between 1 July 2015 and 28 February 2021, the former Interim Inspector-General, the former Inspector-General and the current Inspector-General completed 22 reviews and made 190 recommendations to the Director of Biosecurity.

This review is focused on the department's track record in implementing 163 recommendations in 15 review reports between 3 May 2016 and 28 February 2021. The Inspector-General has omitted 7 reviews from the current review, as they describe areas for improvement rather than recommendations or reports that had recommendations closed by the former Inspector-General.

Reviews and recommendations made before 1 July 2015 were not included in this review. Between April 2009 and June 2015, the former Interim Inspectors-General completed 26 reviews and made 140 recommendations and areas for improvement. However, the current Inspector-General notes that, since the publication of the Beale review (Beale et al 2008) and the entry into force of the *Biosecurity Act 2015*, the department has undergone considerable legislative, technological, structural and cultural changes. Therefore, the Inspector-General has focused on reviewing the department's performance in implementing recommendations since 2015.

1.2 Existing governance framework

This section describes current governance arrangements for performance monitoring and reporting arrangements and how they relate to the accountable implementation of the Inspector-General's recommendations to the Director of Biosecurity.

Biosecurity Act 2015 and Biosecurity Regulation 2016

The *Biosecurity Act 2015* and Biosecurity Regulation 2016 describe how the Inspector-General should conduct reviews, but they do not allocate responsibility for managing and monitoring the department's implementation of the Inspector-General's recommendations.

The Inspector-General must provide a draft review report to the Director of Biosecurity when a review is completed. The Director of Biosecurity must then give the Inspector-General comments on the draft review within 28 days. The Director of Biosecurity may also give the Inspector-General further information on the matters covered in the review.

The Inspector-General must prepare a final review report and provide it to the Director of Biosecurity and the Minister for Agriculture. If the Director of Biosecurity requests it, the Minister for Agriculture may direct that information on a specified matter connected with an Inspector-General review should not be made publicly available on grounds set out in the regulations.

The Director of Biosecurity's formal management response to the report may include full acceptance, partial acceptance, noting or non-acceptance of recommendations. The Inspector-General cannot further argue for recommendations or dispute the department's response to them.

Once the Director of Biosecurity signs off on the department's response to the Inspector-General's recommendations, the department's normal governance and accountability mechanisms becomes responsible for implementing them (and any other actions that the Director of Biosecurity may otherwise direct).

Australian National Audit Office

The department's annual report lists all Australian National Audit Office (ANAO) reports related to the department that the Auditor-General has tabled (DAWE 2021a). While the annual report summarises the department's relationship with the Inspector-General, it does not list the reports that the Inspector-General has published and provided to the department.

During the period being examined by this review, the Auditor-General tabled several relevant reports, including:

- *Implementation of the biosecurity legislative framework* (2017) Auditor-General Report No 34 2016–17
- *Northern Australia Quarantine Strategy – follow-on audit* (2019) Auditor-General Report No 23 2018–19
- *Implementation of ANAO and parliamentary committee recommendations* (2019) Auditor-General Report No 6 of 2019–20
- *Implementation of ANAO and parliamentary committee recommendations: across entities* (2019) Auditor-General Report No 6 2019–20
- *Responding to non-compliance with biosecurity requirements: Department of Agriculture, Water and the Environment* (2021) Auditor-General Report No 42 2020–21
- *Audit insights: implementation of recommendations* (2021) Auditor-General publication.

The Auditor-General has observed that there is a strong correlation between the governance arrangements established to oversee the implementation of recommendations and the successful implementation of recommendations (ANAO 2021). Similarly, in 2015 the former Interim Inspector-General (IIGB 2015) advised:

[The] effective implementation of IIGB [Interim Inspector-General and now Inspector-General] audit recommendations requires strong management oversight and monitoring, together with clear responsibilities and timely actions.

The Inspector-General has not seen any clear evidence that, within existing departmental processes, there is appropriate accountability for managing and driving Inspector-General (and sometimes also ANAO) recommendations for remediation and improvement of biosecurity delivery. Improved governance arrangements would assist the department to implement the recommendations detailed in the formal management response to an Inspector-General review and thereby achieve the full benefit of the review (ANAO 2019).

Portfolio Audit Committee

The department's 2019–20 annual report describes the department's governance framework (DAWE 2021a). The role of the PAC is described as follows:

[The PAC] provides independent advice to the Secretary (as the accountable authority) on the department's risk, finance, control and compliance frameworks and its external accountability responsibilities.

The committee oversees an annual internal audit work program, undertaken by an internal audit team and contracted service providers. The work program is developed in consultation with senior management and is reviewed regularly to ensure that it is relevant and responsive to changes and business risks. The Secretary approves the work program.

The department's PAC supports the department to meet its duties and responsibilities under the *Public Governance, Performance and Accountability Act 2013*. The PAC is authorised, within the scope of its role and responsibility, to:

- obtain information from any official, employee or external party (subject to legal obligation to protect information)
- discuss any matters with internal or external auditors (subject to confidentiality considerations)
- refer audit reports or other information to management committees or boards of the entities as required
- request the attendance of any official, employee, including an accountable authority, or external party at meetings
- obtain independent legal or other professional advice to meet its responsibilities, if necessary, at the department's expense and approved by the Secretary or delegate.

The department has advised that the PAC regularly receives reports for noting related to the Inspector-General's recommendations.

A substantial number of similar Inspector-General's recommendations dealing with significant deficiencies in the department's biosecurity delivery have been made multiple times. In December 2020 the PAC noted that the implementation of some Inspector-General recommendations had been outstanding for an extended period of time. It requested information on the processes used to track and manage outstanding and overdue Inspector-General recommendations.

At its September 2021 meeting, the PAC resolved that the Biosecurity Strategy and Reform Division would report to the next PAC meeting, in December 2021, on the progress in implementing recommendations of the Inspector-General and those of the ANAO performance audit report *Responding to non-compliance with biosecurity requirements*.

1.3 Previous Inspectors-General reviews of the implementation of recommendations

It has been clear for some time that the department's governance arrangements must be strengthened so that Inspector-General review recommendations can be implemented in an effective and timely way.

The former Interim Inspector-General and the former Inspector-General conducted 4 reviews on the implementation status of Inspectors-General recommendations – in 2019, 2018, 2016 and 2015 (IGB 2019; IGB 2018; IIGB 2016; IIGB 2015). The former Inspector-General (IGB 2018; IGB 2019) identified the need to streamline the department's internal processes to better track the implementation of recommendations. The 2018 review (IGB 2018) recommended that:

The department should streamline and improve internal transparency of processes for short- and long-term tracking of implementation of decisions and actions arising from IIGB [Interim Inspector-General] and IGB [Inspector-General] audits and reviews. It should also integrate them with processes for tracking responses to internal audits and ANAO [Australian National Audit Office] reviews. Risk owners should be responsible for entering and tracking actions against IGB review recommendations in departmental tracking systems. Progress should be visible to senior departmental risk managers, the IGB and other audit bodies as appropriate.

The 2019 review (IGB 2019) recommended that:

For each IGB [Inspector-General] review, the department should assign responsibility for oversight of outcomes, and documenting progress with implementation, to a specific position or section, with access to these records by other relevant sections, as well as periodic overall review by senior management, IGB and other auditors.

As recently as 29 April 2021, the Inspector-General (IGB 2021) made a directly relevant recommendation:

Agriculture should streamline and improve internal transparency of processes for short- and long-term tracking of implementation of decisions and actions arising from other audit and review processes (such as internal audits and Australian National Audit Office and Inspector-General of Biosecurity reviews).

The 2021, 2019 and 2018 reviews demonstrated the need to strengthen the department's governance arrangements for implementation of recommendations, and identified ways to do this. The reviews found that the department should:

- create clear responsibilities for implementing recommendations – for example, responsibilities for recording and progressing agreed decisions and actions related to recommendations and reviewing and oversight of the progress of implementation
- manage the impact of departmental restructures and staff changes to ensure the division/section/position responsible for implementing recommendations and corporate knowledge is not lost
- consider recommendations by review, rather than individually, to ensure that staff know how their individual actions contribute to the overall biosecurity outcomes
- establish Planning Hub as an easier-to-use tool that would provide governance support and performance oversight

- integrate the oversight of the implementation of Inspectors-General recommendations with other departmental audit and review processes (such as ANAO and internal audits)
- improve the department's processes so that the implementation of review recommendations can be tracked over time
- ensure that where several divisions are responsible for implementing recommendations from the same review, create increase visibility so that each division is aware of what other divisions are doing
- ensure that one division/section/position is responsible for overseeing progress of the implementation of recommendations from a specific review
- record recommendations as 'closed' only when the department has evidence that the recommendation has been implemented in line with the envisaged outcomes – not when an intent or process to implement them has been proposed
- periodically review the implementation of recommendations, including those that need to be implemented in stages or over a longer term or that need to be modified over time.

The Inspector-General concurs with predecessors' suggestions, which would have strengthened the department's governance arrangements if they were implemented. The Inspector-General has expressed frustration to departmental senior managers that it has been necessary to produce a fifth review report on this subject.

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

Chapter 2

Current review: an audit of implementation of past Inspectors-General recommendations

2.1 Purpose

The purpose of this review was to assess how the department ensures that Interim Inspector-General and Inspector-General review findings and recommendations are used to strengthen Australia's biosecurity system.

2.2 Scope

The current review examined the department's performance in implementing recommendations of 15 Inspectors-General reviews completed between 3 May 2016 and 28 February 2021.

The review considered:

- the department's governance systems and processes for ensuring that Inspectors-General review recommendations have been implemented appropriately
- the completed and open review recommendations
- how the department ensures that wider lessons from the reviews inform ongoing reform and improvements of Australia's biosecurity system.

The review did not examine:

- implementation of recommendations in Interim Inspectors-General review reports completed between April 2009 and June 2015
- government policies that may have affected implementation of recommendations
- former Interim Inspector-General review reports that described areas for improvement but had no specific recommendations:
 - ▶ *Management of biosecurity risks associated with transhipped ships stores*
 - ▶ *Implementation of previous Interim Inspector-General of Biosecurity recommendations – review April 2016*
 - ▶ *Horse imports: management of biosecurity risks July to December 2015*
 - ▶ *Horse imports: management of biosecurity risks January to June 2015*
 - ▶ *Implementation of previous Interim Inspector-General of Biosecurity recommendations (2014–15).*
- former Interim Inspector-General review report recommendations that were closed by the former Inspector-General:
 - ▶ *Management of biosecurity risks associated with timber packaging and dunnage*
 - ▶ *Effectiveness of biosecurity controls for importation of natural sausage casings.*

2.3 Review methodology

During the review, the Inspector-General consulted extensively within the department. The Inspector-General also:

- met with biosecurity division executives in June 2021 to discuss the implementation status of review recommendations and identify impediments and areas requiring improvement
- analysed the previous Inspectors-General reviews on the implementation of recommendations so that commonalities in the department's performance in implementing recommendations could be identified
- reviewed the governance and performance oversight arrangements for the implementation of recommendations
- reviewed the current governance processes that departmental staff use to manage recommendations
- reviewed directly relevant literature that examines how departments and organisations implement recommendations from reviews (such as ANAO)
- grouped the recommendations into 'themes' to obtain an overview and identify any reoccurring topics
- performed an audit of 9 closed recommendations to assess the records and evidence of actions and decisions taken to address individual recommendations by recording:
 - ▶ the departmental responses to the 9 recommendations at the time of publication
 - ▶ what subsequent actions and decisions were taken to address each recommendation
 - ▶ the Inspector-General's assessment of whether the 9 recommendations had been effectively implemented and the biosecurity system improved.

As required by the *Biosecurity Act 2015*, the Inspector-General presented the final report to the Director of Biosecurity. This published report contains the department's response to the final recommendations. The final report is published on the Inspector-General's website, a copy provided to the Minister for Agriculture, and key stakeholders are informed of its publication.

2.4 Reviews within the current audit

[Table 1](#) summarises the implementation status of 163 recommendations by the interim, former and current Inspectors-General, published in 15 reviews between 3 May 2016 and 28 February 2021. For this review the Inspector-General also conducted an audit of implementation of a sample of 9 closed recommendations (see [section 4.2](#)).

Of the 163 recommendations, 14 recommendations have remained open (and outstanding) for at least 2 years. A further 31 recommendations have been open for at least 12 months.

TABLE 1 Status summary of Inspectors-General review recommendations, May 2016 and February 2021

Inspector-General review title	Publication date	Total number	Number closed	Number open
Adequacy of department's operational model to effectively mitigate biosecurity risks in evolving risk and business environments	February 2021	19	0	19
Biosecurity risk management of international express airfreight pathway for non-commercial consignments	July 2020	25	5	20
Adequacy of preventative border measures to mitigate the risk of African swine fever	March 2020	13	8	5
Effectiveness of Approved Arrangements in managing biosecurity risks in Australia	August 2019	13	7	6
Implementation of Inspector-General of Biosecurity recommendations (2019–20)	July 2019	3	3	0
Pest and disease interceptions and incursions in Australia	May 2019	5	3	2
Effectiveness of biosecurity measures to manage the risks of brown marmorated stink bugs entering Australia	May 2019	14	13	1
Environmental biosecurity risk management in Australia	April 2019	7	6	1
Implementation of Interim Inspector-General of Biosecurity recommendations (2018–19)	September 2018	1	1	0
Horse importation biosecurity risk management	September 2018	4	4	0
Military biosecurity risk management in Australia	July 2018	5	3	2
Hitchhiker pest and contaminant biosecurity risk management in Australia	July 2018	9	5	4
Uncooked prawn imports: effectiveness of biosecurity controls	December 2017	22	18	4
Review of Department of Agriculture and Water Resources management of biosecurity risks posed by invasive vector mosquitoes	May 2017	11	11	0
Effectiveness of biosecurity controls for importation of tomato and carrot seeds	May 2016	12	12	0
	Totals	163	99	64

Note: The figures for the Inspectors-General review recommendations are recorded as of 9 August 2021.

Chapter 3

Results of current audit

3.1 Theming of review recommendations

As part of this review the Inspector-General analysed previous review recommendations and grouped them into a number of key themes, which are presented in [Table 2](#).

When the recommendations were organised into key themes, it became evident that there are certain areas in which the department has struggled to make substantial progress (resulting in similar recommendations being made through multiple Inspector-General reviews). Many recommendations – namely, 76 out of 163 – are grouped under just 3 themes ('Assurance and verification'; 'Governance/management'; 'Better practice'). This is cause for significant concern.

In a recent Inspector-General report titled *Adequacy of department's operational model to effectively mitigate biosecurity risks in evolving risk and business environments*, the Inspector-General pointed out that there were several foundation weaknesses ('root causes') in the department's delivery of biosecurity functions that, if not addressed, will continue to create problems in many areas of biosecurity.

The department needs to consider why there are a significant number of recommendations under 6 of the themes, so that it can isolate the underlying (root) causes and identify and implement actions, improvements and reforms to address them.

For future Inspector-General reviews, the department should continue to group the recommendations under the major themes shown in [Table 2](#). This will ensure that wider lessons can be learned from selected reviews, which can then be used to support ongoing reform and improvements and address systemic issues of the biosecurity system. This work should be part of a continuous improvement program for biosecurity.

TABLE 2 Themes of Inspectors-General recommendations

Theme	Number of recommendations
Assurance and verification	30
Governance/management	24
Better practice	22
Working collaboratively	13
Surveillance	11
Funding/resource allocation	10
IT systems	7
Technology	6
Education and awareness	5
Communication	4
Risk analysis/assessment	4
Co-regulatory arrangement	3
Data management	3
Prevention, preparedness and response	3
Risk mitigation	3
Staff training	3
Other themes (themes with 1 or 2 recommendations)	12
Total recommendations	190

Recommendation 1

The department needs to identify the root causes hindering full implementation of accepted Inspector-General recommendations. The analysis process should look at themes of similar recommendations to identify potential systemic issues and ways to address them.

3.2 Review verification activities

The Inspector-General audited 9 closed recommendations to verify the extent and quality of their implementation. The records and evidence of actions and decisions on each recommendation were audited. The outcomes of the audit are shown in Appendix A, [Table 4](#).

The Inspector-General's rating of the implementation status indicates whether a recommendation had been effectively implemented and whether it has improved the biosecurity system.

3.3 Engagement meetings

The Inspector-General held engagement meetings with biosecurity division executive managers in June 2021. Attendees discussed hindrances to the timeliness of and success in implementing recommendations; and improvements being made or considered to address the situation.

[Table 3](#) gives the Inspector-General's summary of the key messages and themes from the collective discussions; it does not attribute any comments to any individuals.

TABLE 3 Combined feedback from biosecurity division executive managers

Key issue	Summary
Establishing governance arrangement	<p>The department needs to establish better governance arrangements within biosecurity divisions, and the department generally, to implement Inspector-General review recommendations. There was general lack of clarity on whether biosecurity divisions' governance on this matter fitted seamlessly into the department's overall governance arrangements. It is anticipated that the Biosecurity and Compliance Board will establish direct lines of governance and increase the department's focus on the implementation of Inspector-General recommendations. The board has committed to reviewing closed Inspector-General recommendations every 6 months.</p>
Ownership of Inspector-General recommendations	<p>Many Inspector-General recommendations were not correctly assigned to issue/solution owners. This is because ownership for implementing recommendations was incorrectly assigned when the original review was finalised; or because of divisional restructuring or staff turnover. There has been poor accountability for the correct assignment of ownership of recommendations to First Assistant Secretaries, and during divisional restructuring it is difficult to agree on which First Assistant Secretary is responsible for each recommendation. There has been confusion regarding the roles and accountability of biosecurity divisions, the corporate division and the Office of the Inspector-General.</p> <p>The department should implement a process to correctly assign ownership for each recommendation when the original review is finalised. This would mean that, within the department, ownership of recommendations and accountability for implementing them would be already known at the time of the department's formal management response to Inspector-General reviews.</p>
Project management approach	<p>As a result of the status review meetings, the biosecurity divisions have now correctly assigned ownership of open recommendations to First Assistant Secretaries. Largely flowing from the government's recent funding of and the department's implementation of major new biosecurity initiatives, biosecurity divisions are substantially boosting project management capability. This means that implementation of Inspector-General recommendations should be able to be managed within the overall improvement implementation processes.</p>
Establishing department accountability	<p>Once Inspector-General review recommendations are signed off by the Director of Biosecurity, the accountability for managing implementation of responses to recommendations then flows from the Director of Biosecurity to the Deputy Secretary, Biosecurity, and then to the department's First Assistant Secretaries and responsible divisional staff. This line of accountability has generally been established when advice was provided to the Director of Biosecurity but was then confused when the corporate division insisted on staff of the Inspector-General's office entering relevant information into the corporate tracking system.</p>
Biosecurity system performance and assurance	<p>The department needs to take a project management approach to implementing Inspector-General recommendations. This would allow the implementation to be embedded into the overall process of ongoing improvement. Also, it would mean that implementation did not rely on corporate knowledge of individual staff. It would also support the implementation of both broader recommendations and recommendations grouped together by the department, because it would clearly identify agreed departmental actions to address these recommendations and the divisions responsible for the implementation.</p>
Planning Hub software system	<p>Planning Hub does not satisfactorily support the department's governance processes for implementing Inspector-General recommendations. It is difficult for the department's biosecurity executive and responsible staff to manage, monitor and report on the implementation of recommendations in Planning Hub.</p> <p>Not all staff are recording progress on implementation in Planning Hub. Some biosecurity divisions are using a separate spreadsheet to manage implementation of recommendations.</p> <p>In Planning Hub, recommendations are listed as either 'open' or 'closed'. From a project management perspective, it might be useful to create an 'in progress' status.</p>
Closure of recommendations	<p>The biosecurity divisions' executive managers observed that, if multiple Inspector-General reviews have made similar recommendations and the department is still implementing them, it appears that underpinning reform is needed. In such situations, the department needs to undertake some form of root cause analysis to identify and understand the causes of the similar recommendations, which can then be addressed to improve the biosecurity system.</p>

Chapter 4

Improving governance arrangements

4.1 Improving governance processes

Inspectors-General have made efforts to better engage with the department to foster more effective governance for the implementation of Inspector-General recommendations.

In 2019, following discussions with the department's corporate area, a joint governance process for managing Inspector-General review recommendations was established. This is set out in *IGB–department (corporate) protocol: protocol for management of IGB's review recommendations in the Planning Hub's governance module by the Department of Agriculture's biosecurity divisions* (the 2019 protocol) (IGB 2019).

The Inspector-General's office provided the 2019 protocol to relevant executives and other staff. It outlined:

- roles of the Inspector-General's office and biosecurity divisional staff and responsibilities for:
 - ▶ fact checking the review report
 - ▶ seeking the department's formal response to a review
 - ▶ tracking the completion and sign-off on satisfactory implementation of recommendations by the executive (that is, Deputy Secretary, Biosecurity)
- processes that officials should use to record the progress and finalisation of recommendations.

However, it has become increasingly clear that the 2019 protocol has been largely treated as an administrative process rather than as a practical input to the department's continuous improvement program for its biosecurity functions.

Further, the 2019 protocol's workflow diagram did not reinforce accountability at the appropriate points within the department to ensure that Inspector-General recommendations are addressed once they have been accepted (or otherwise) by the Director of Biosecurity.

Therefore, the department needs to replace the 2019 protocol with a governance framework that clarifies that it is the responsibility of the department, not the Inspector-General's office, to manage the implementation of the Inspector-General's review recommendations. To support the department's continuous improvement, the Inspector-General's office will no longer use the 2019 protocol.

Recommendation 2

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

4.2 Response to recommendations

The Director of Biosecurity (the Secretary) provides a formal management response to an Inspector-General review. The response outlines the department's position by agreeing in full, agreeing in principle, disagreeing with or noting recommendations. The response sets out the agreed actions and decisions the department will undertake to address the recommendations. The management response, which is published in the final report on the Inspector-General's website, formalises the department's commitment to implement (or otherwise) the Inspector-General recommendations.

The Inspector-General respects the Director of Biosecurity's right to not accept specific recommendations and to note or agree in principle to specific recommendations when providing the formal response to a review report. However, the Inspector-General is concerned that, when recommendations are noted, the department does not commit to addressing the issue that has been identified in the review. The ANAO has maintained that 'noting recommendations is equivalent to disagreeing' (ANAO 2019).

It is fully accepted that the department's response to a review report may include responses to groups of recommendations. The Inspector-General supports the department's newly established approach of grouping recommendations under similar themes in the formal management response if that assists the department in planning integrated implementation of the recommended improvements.

The approach taken to responding to individual or groups of recommendations matters little if there is a well-established governance approach within the department that feeds responses to Inspector-General recommendations into a program of continuous improvement. What matters most, both internally and externally, is that there is clarity on what the department will implement to address each recommendation.

The governance process that provides advice to the Director of Biosecurity on whether to accept, or not, the Inspector-General's recommendations should also provide clear advice on what partial or full action the department intends to take for each recommendation (including for those recommendations for which the advised response is agreed in principle or noted). The internal management and governance processes for implementation would then flow from the Director of Biosecurity's decisions.

A functional continuous improvement program for biosecurity divisions (or the whole department), with its own appropriate governance, would obviate the need for future Inspectors-Generals to conduct further reviews like this one.

The status of agreed improvements would already be transparent internally, routinely reported to the Director of Biosecurity and the Minister, and readily auditable by the ANAO. It would also potentially be publicly reported as to what progress was being made (or not) in addressing systemic and specific weaknesses in Australia's preventative biosecurity arrangements.

If outstanding Inspectors-General recommendations are not adequately addressed in a timely manner, it is likely that future (targeted and broad) Inspector-General published review reports will again highlight the same deficiencies.

Recommendation 3

The department needs to establish a more clearly understood process to assign accountability for, and track, the implementation of the Inspector-General's recommendations and any other agreed improvements to the biosecurity system. As part of the department's routine response to each Inspector-General review, accountability should be assigned from the time that the advice is provided to the Director of Biosecurity.

4.3 Assignment of responsibilities

The responsibility for managing Inspector-General recommendations needs to be clearly assigned to positions within the department. The department's governance processes need to make clear who is accountable for implementing recommendations when Inspector-General review reports are finalised:

- When the department is coordinating and drafting the management response to an Inspector-General review, the responsible executive should identify the specific section/s that are responsible for each recommendation.
- Once the Director of Biosecurity has provided a formal management response to the Inspector-General, the department's corporate area should create the recommendations in Planning Hub, with input from the respective biosecurity divisions.

It is important that responsibilities are correctly assigned within the respective biosecurity divisions and to responsible staff members to both provide expert advice to the Director of Biosecurity and to progress implementation of recommendations.

The department currently assigns responsibilities to specific staff members to implement recommendations in Planning Hub. However, the department should assign responsibilities to specific positions instead of specific staff members and ensure the assignment of responsibilities is updated in Planning Hub when changes in staff occur – for example, as a result of divisional restructuring or staff turnover. The clear assignment of these responsibilities to specific positions creates accountability for staff in those positions to progress and effectively implement recommendations.

Recommendation 4

The department should assign accountability to specific positions (not only to persons) for the implementation of responses to recommendations.

Chapter 5

Monitoring and reporting implementation of responses to recommendation

5.1 Governance Module, Planning Hub

The department uses the Governance Module in Planning Hub to manage, record and track the implementation of recommendations from audits and reviews, including Inspector-General of Biosecurity, Inspector-General of Live Animal Exports, ANAO and internal audit (DAWE n.d.).

The Inspector-General, through consultation with the department's biosecurity and some other areas of management, has ascertained that there is a broadly held view that Planning Hub does not satisfactorily support the department's governance arrangements or processes, including the recording of actions and decisions being taken, and the monitoring and tracking of the progress made to implement recommendations.

Planning Hub is widely regarded as being neither user-friendly nor fit-for-purpose to manage Inspector-General recommendations. As a result, some biosecurity divisions have been managing implementation and monitoring of Inspector-General recommendations using alternative processes, such as spreadsheets. Therefore, Planning Hub does not appropriately support management's oversight of performance and its ability to monitor implementation progress. This in turn impedes the timeliness of overall implementation and improvements to Australia's preventative biosecurity. The department has advised that it is working with the external provider to streamline Planning Hub functionality for project management, risk management and governance activities.

As a matter of sound governance using the existing software, review recommendations should be created in the Governance Module in Planning Hub (or replacement system) at the time the Director of Biosecurity receives the Inspector-General's review recommendations. This would enable the department's response to recommendations, including those not accepted, agreed, agreed in-principle and noted, to be tracked.

From that point forward, the records in Planning Hub would include the recommendations, corresponding departmental responses and which First Assistant Secretary position is the accountable owner of each recommendation.

This system would be facilitated by the department's corporate areas, but ownership and accountability for addressing recommendations would always sit with the relevant biosecurity divisions.

5.2 Responsibilities for implementing recommendations

The departmental positions currently responsible for implementing Inspector-General recommendations are:

- the ‘responsible officer’, which is a specific position/section responsible for progressing the implementation of their recommendation/s and recording the decisions and actions being taken in Planning Hub
- the ‘record owner’, which is a senior executive (First Assistant Secretary) responsible for overall management and oversight of the implementation of recommendation/s in Planning Hub
- the ‘record approver’, which is a senior executive (Deputy Secretary, Biosecurity) who is responsible for the final approval to close recommendations when they have been implemented and has overarching management accountability for the implementation of recommendations.

The former Inspector-General (2019) found that record owners did not always understand their responsibilities to update Planning Hub with the progress of the implementation of recommendations. The record owner also did not have visibility of what other divisions in the department may be progressing in relation to recommendations from the same review.

The former Inspector-General (2019) recommended that:

For each IGB [Inspector-General] review, the department should assign responsibility for oversight of outcomes, and documenting progress with implementation, to a specific position or section, with access to these records by other relevant sections, as well as periodic overall review by senior management, IGB and other auditors.

The Inspector-General concurs with this finding and recommendation. The department’s senior management does not have sufficient oversight of the progress of the implementation of recommendations so that they can ensure the recommendations are being effectively implemented to address the identified issue and within the agreed due date for completion.

The Inspector-General is heartened by significant constructive changes to the department’s biosecurity management arrangements in recent months. The establishment of the Biosecurity and Compliance Board (involving the Deputy Secretary Biosecurity, and all biosecurity First Assistant Secretaries) is a very positive step forward.

5.3 Project management approach, including project plans

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

The Inspector-General's observation is that, if the department (as a whole, not only biosecurity) has in place a basic, consistently applied business improvement and project management approach, it may not have been necessary to conduct the current review. Clearly, this deficiency has not resulted from recent action or inaction but is a longstanding weakness in commitment to routine organisational good practice.

The development of project plans is required for the successful implementation of recommendations (ANAO 2021). The ANAO has emphasised that, when project plans are not developed, actions that address the recommendation are generally not implemented at all or are not implemented in a timely manner.

An embedded project management and continuous improvement approach would provide oversight to the new Biosecurity and Compliance Board, the department's executive management team and the PAC on progress with organisational improvements, and likely impediments to consistent implementation of recommendations.

5.4 Industry engagement

The Inspector-General's previous Operational Model review (IGB 2021) identified that the department should work in closer partnership with industry on improvements across different areas of the biosecurity system, including the development of an improvement plan or 'road map' and during the implementation of the Operational Model review recommendations.

[The department and industry must work collaboratively in a] 'shared responsibility' (and 'shared accountability') approach to undertake continuous improvement that would include successful implementation of relevant Inspector-General recommendations. The implementation of Inspector-General recommendations can provide a context in which the department and industry can 'build new engagement processes and engage in new dialogue about how 'we' build the future biosecurity system'.

Recommendation 5

An overt commitment to continuous improvement should include, and be demonstrated by, the department engaging and collaborating with relevant industry sectors more constructively and effectively.

5.5 Executive oversight of implementation of recommendations

The department needs to have an embedded formal process to provide oversight and to track and monitor the overall progress of the implementation of Inspector-General recommendations, through the department's Biosecurity and Compliance Board, executive management, and the PAC. An appropriate practical framework and process will strengthen the department's internal accountability and oversight and improve the consistency and timeliness of implementation of recommendations.

The Inspector-General commends the department's commitment to establishing markedly improved governance arrangements to monitor and review the progress of the implementation of recommendations. The department's executive management has committed that the Biosecurity and Compliance Board will review the progress of the implementation of Inspector-General recommendations every 6 months (see [section 6.2](#)). The department's PAC has a role in monitoring the implementation progress of recommendations and whether this implementation is occurring in a timely manner (see [section 6.3](#)).

When the Inspector-General requests it, the department is required to give the Inspector-General the implementation status of recommendations. This will continue to provide ongoing Inspector-General monitoring access (beyond the planned annual public reports published by the department) as the department takes full accountability for managing and monitoring implementation of responses to Inspector-General recommendations.

The improvements being implemented collectively for the department's biosecurity divisions (under the Biosecurity and Compliance Board) need to be integrated with improved governance arrangements for the department more broadly. To provide ongoing assurance that the department's biosecurity functions are being improved through implementation of recommendations, the Inspector-General needs to be confident that the Director of Biosecurity has clear line of sight, and monitoring and reporting in place, for progress with implementation of recommendations.

The department has committed to delivering an annual report on the implementation of Inspector-General review recommendations (see [section 6.1](#)). The relevant First Assistant Secretary should be responsible for providing recommendations to the Deputy Secretary, Biosecurity, to close recommendations when they have been implemented.

This will ensure that the Director of Biosecurity's most senior delegate has the overall accountability for, and oversight of, the implementation of recommendations that will improve the department's delivery of biosecurity functions under the *Biosecurity Act 2015*.

Recommendation 6

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

5.6 Verification of recommendation implementation

The department does not have a formalised process to verify that Inspectors-General review recommendations are effectively implemented. The Inspector-General has been the primary mechanism that assessed the department's implementation of Inspectors-General review recommendations. Turner (2020) advocates the establishment of a follow-up process to monitor if actions have been implemented to address audit recommendations including evaluating the adequacy, effectiveness and timeliness of actions and decisions taken by management.

The former Interim Inspector-General, the former Inspector-General and the current Inspector-General all decided to include in their annual work program reviews assessing the implementation of recommendations. So far, 5 such reviews have been undertaken (including this review) (IGB 2019; IGB 2018; IIGB 2016; IIGB 2015).

The department should be accountable to the Director of Biosecurity for the verified implementation of Inspector-General recommendations through processes managed by Internal Audit and on advice from the PAC. Because the department has not had this process in place, some recommendations were not implemented effectively in a way that addressed the identified issue, were not implemented in a timely way or were not implemented at all, despite what the department's records might indicate.

Verification could be undertaken on a sample of recommendations randomly selected for this purpose. This would provide assurance that there is an adequate strong commitment to continuous improvement and sound corporate governance. Verification activities would identify areas that worked well, improvements and lessons learned.

It should not be the responsibility of the Inspector-General to assess and verify the department's effectiveness in implementing these recommendations.

Recommendation 7

The department's internal audit functions should include a process to verify appropriate closure of Inspector-General recommendations, including validating evidence.

Chapter 6

Recent biosecurity governance improvements

6.1 Commonwealth Biosecurity 2030 strategy

On 26 May 2021 the department published *Commonwealth Biosecurity 2030* (DAWE 2021b), which will:

- provide a clear and practical roadmap to direct and guide projects, initiatives and investments associated with the Australian Government's biosecurity remit. Annual action plans will be developed to guide delivery and ensure transparency in the department's efforts
- include implementation of a performance and evaluation framework and preparation of annual reports detailing efforts to address system issues identified by the Inspector-General and in other independent reports
- deliver the first annual report on progress implementing the Inspector-General's recommendations to enhance the department's risk-based biosecurity approach.

As part of the strategy presented in *Commonwealth Biosecurity 2030*, the department has committed to publishing an annual report on the department's progress in implementing Inspector-General review recommendations, with the first report due to be finalised by the end of 2021. The Inspector-General commends the department for this initiative.

It is understood that the annual report will provide a formal summary of how the department tracks, monitors and reports recommendations through to their closure, thus providing oversight of the department's implementation of review recommendations. The department has advised that this report will be published on the department's website; this transparency is also commended.

Recommendation 8

The department should drive and strengthen accountability throughout the department's biosecurity divisions by utilising annual progress reporting against the strategy *Commonwealth Biosecurity 2030*, and the implementation status of Inspector-General review recommendations.

6.2 Biosecurity and Compliance Board

In May 2021 the department advised that it had established the Biosecurity and Compliance Board, with the following purpose:

The Biosecurity and Compliance Board (the Board) will help ensure the Biosecurity and Compliance Group (the Group) can address the significant and growing pressures faced by the Australian biosecurity system due to cargo volumes, traveller requirements and a limited staffing envelope.

The Board will look across the whole-of-biosecurity system to achieve two main goals:

1. Enable better regulatory practice
2. Anticipate and act on emerging threats.

It will do this through a four-year transformation program, closely managed and monitored to ensure the outcomes and benefits are being achieved.

Although this is not explicit in the board's terms of reference, the department has advised that the board will review the progress, track the performance and provide oversight of the implementation of Inspector-General recommendations every 6 months. Presumably, this biannual review will be part of the department's annual reporting under Commonwealth Biosecurity 2030.

The Inspector-General commends the department for making a commitment to provide coordinated oversight of the overall progress and performance of the implementation of Inspector-General recommendations. It is vital that the strengthened biosecurity governance that the board provides also links directly to enhanced processes for the department's overall governance, including reporting to the department's executive management group and PAC.

The Inspector-General expresses no view on how the department assigns responsibilities between biosecurity divisions (via the board) and corporate (governance and reporting) areas, or how it improves overall governance functions, provided that transparent assurance can be given regarding the functionality and accountability of the improved biosecurity arrangements.

Recommendation 9

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

6.3 Portfolio Audit Committee

The Inspector-General has been advised by the PAC Chair that the PAC will monitor the implementation of Inspector-General's recommendations to ensure it is occurring, and in a timely manner. Departmental officers within the biosecurity group have responsibility for managing and implementing recommendations and tracking of that performance.

Currently, the Corporate Secretariats section prepares a report showing the number of open and closed recommendations for each Inspector-General review for noting by the PAC. However, no evidence has been provided that the PAC has previously done more than note the statistical report. It seems that members of the biosecurity executive team have never been asked to attend a PAC meeting to provide assurance to the PAC that appropriate arrangements are in place.

It would normally be expected that the internal audit area would ensure that the PAC is provided with relevant reports that would enable the PAC to evaluate the adequacy, effectiveness and timeliness of actions and decisions undertaken by management to address Inspector-General recommendations (for example, Turner 2020). This would normally include sufficient audit/verification work to provide assurance that reporting was complete and accurate.

The Inspector-General's observation is that the PAC is not yet sufficiently well supported to be able to provide appropriate advice to the Director of Biosecurity in this regard.

The Inspector-General will provide all future Inspector-General review reports directly to the PAC to increase its visibility of organisational and national biosecurity risks. A copy of each Inspector-General review report is also provided to the ANAO.

Recommendation 10

The Portfolio Audit Committee should be appropriately supported to enable it to advise the Director of Biosecurity on risks to the department's effective delivery of its biosecurity functions as highlighted through Inspector-General reviews and recommendations, and the timeliness and completeness of the implementation of response to recommendations.

Chapter 7

Summary comments

There has been a long sequence of interaction between Interim Inspectors-General and Inspectors-General and the department regarding the implementation of recommendations made in Inspectors-General review reports. The department's implementation of Inspectors-General recommendations has been previously reviewed in 2019, 2018, 2016 and 2015 (IGB 2019; IGB 2018; IIGB 2016; IIGB 2015) and now in 2021.

None of these reviews would have been necessary if the department had an established commitment and sound process for continuous improvement and appropriately accountable mechanisms within biosecurity and for the department more broadly.

The department has struggled to understand how to handle the independent role of Inspector-General established under the *Biosecurity Act 2015*, the seriousness of Inspectors-General recommendations, and the necessity for the small staff team assigned to support the Inspector-General to also provide independent support. The flipside of this is that the department, in some areas and ways, has regarded Inspector-General recommendations more as internal working group recommendations than as external scrutiny, such as that provided by the ANAO.

This has not been the case at the level of the Director of Biosecurity. The Director of Biosecurity has, without exception, responded formally to Inspectors-General review reports as required under the *Biosecurity Act 2015*. It has been endemic weaknesses in governance within both corporate areas and biosecurity divisions of the department that has led to confusion, poor accountability and inefficiency in the handling of advice to the Director of Biosecurity on Inspectors-General recommendations, and then accountable, timely implementation of responses to recommendations. Clear leadership from the department's Secretary (who is also the Director of Biosecurity) will be required in order to substantially 'shift the dial' in the department's attitude to accountability and governance processes.

In 2021 there were significant improvements in governance for biosecurity divisions through the establishment and operation of the Biosecurity and Compliance Board. This is strongly welcomed. Similarly, the significant strengthening of project management capability and more embedded approach to continuous improvement to address both systemic capability and specific needs is also commended.

The improvement program being driven by the Biosecurity and Compliance Board needs to be matched by further improvements in the efficiency and accountability of the department's overall governance arrangements. The department's corporate areas need to establish and support corporate systems, including practical tracking and reporting software; integration of improved biosecurity planning, delivery and monitoring into corporate improvement approach; and timely, valuable reporting to the PAC and the Director of Biosecurity.

Australia needs the department to be better at what it does in providing biosecurity functions for our nation. That improvement requires better governance, not just more resources and more hard work from its committed workforce.

Appendix A

Agency response



Australian Government
**Department of Agriculture,
Water and the Environment**

**ANDREW METCALFE AO
SECRETARY**

16 December 2021

Mr Rob Delane
Inspector-General of Biosecurity
c/o Department of Agriculture, Water and the Environment
GPO Box 858
CANBERRA ACT 2601

Dear Mr Delane

Thank you for your correspondence of 24 November 2021 providing your review report, *Accountable implementation of Inspectors-General of Biosecurity review recommendations (2015–2021)*, for management comments on the review findings.

I appreciate your further insights and observations on the department's approach to governance and management of the biosecurity system. The department is committed to ongoing improvement and will continue best efforts to ensure the recommendations you have made are thoroughly considered and implemented appropriately.

The department's formal management response to the recommendations in your report is at Attachment A. I note your recommendations largely accord with reform work already underway across regulatory aspects of the biosecurity system to ensure lasting improvements are made and biosecurity legislation is fit for purpose. I agree in full with all ten recommendations contained in your review.

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

Best wishes

A handwritten signature in black ink, appearing to read 'Andrew Metcalfe'.

Andrew Metcalfe AO
Director of Biosecurity

Attachment A: Agency Response

Recommendation 1 - agreed

The department needs to identify the root causes hindering full implementation of accepted Inspector-General recommendations. The analysis process should look at themes of similar recommendations to identify potential systemic issues and ways to address them.

The department will publish a report detailing its progress implementing the recommendations made by the Inspector-General of Biosecurity (IGB) as part of its annual action plans for delivery of the Commonwealth Biosecurity 2030 strategic roadmap. The report will reflect progress addressing key system issues emerging from IGB findings, which is intended to strengthen the department's efforts to deliver lasting fit for purpose improvements and guide future actions.

Recommendation 2 - agreed

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

The department published its Regulatory Practice Statement in June 2021, signalling its intent to making continuous improvement in the pursuit of better regulatory practice. The Commonwealth Biosecurity 2030 strategic roadmap also prioritises our efforts to build a stronger, smarter biosecurity system that includes transparent reporting of both implementation progress and our forward reform efforts.

The department's Biosecurity and Compliance Board, established in 2021, will have visibility of progress in this area. This includes reviewing reports when received to consider recommendations and determine agreed responsible lead/s, and a standing item related to progress implementing agreed IGB and ANAO recommendations. This is supported by further changes relating to whole of department accountability arrangements for recommendation implementation, associated project delivery and resolution.

The department will routinely report to the Portfolio Audit Committee on its progress in implementing Inspector-General recommendations.

Recommendation 3 - agreed

The department needs to establish a more clearly understood process to assign accountability for, and track, the implementation of the Inspector-General's recommendations and any other agreed improvements to the biosecurity system. As part of the department's routine response to each Inspector-General review, accountability should be assigned from the time that the advice is provided to the Director of Biosecurity.

The department will investigate possible changes to the current processes for tracking and reporting on the implementation of recommendations made by the Inspector-

General of Biosecurity. Work is currently underway to provide greater guidance for, and commitment to, effective planning, delivery, progress reporting and project closure reporting. This includes clearer articulation of support available to assist projects to get on track.

Recommendation 4 - agreed

The department should assign accountability to specific positions (not only to persons) for the implementation of responses to recommendations.

The department currently assigns recommendations to the appropriate position (and person occupying the position). We will incorporate clarity on this aspect as part of internal training to ensure effective accountability mechanisms are in place, including ensuring timely changes to accountability where structural responsibilities are changed.

Recommendation 5 - agreed

An overt commitment to continuous improvement should include, and be demonstrated by, the department engaging and collaborating with relevant industry sectors more constructively and effectively.

The department is committed to strong partnerships with industry to ensure a robust biosecurity system. The department has continued to engage frankly through existing industry consultative bodies (such as the Department Cargo Consultative Committee, Imported Food Consultative Committee and the Biosecurity Futures group), and beyond with the boards of Ports Australia, the National Farmers Federation and Fertilizer Australia. A series of bilateral discussions with peak bodies is also underway. At the border the department continues to work with Airport operators, airlines and other relevant stakeholders.

The department is continuing its targeted engagement and co-design approach in relation to a number of specific reform initiatives. This includes the co-design of future biosecurity systems and toward new sea and air cargo intervention models. It is also working with various importers in a proof-of-concept trial and co-design of new third-party arrangements for imported cargo.

Industry engagement will form part of the development of annual action plans for delivery of the Commonwealth Biosecurity 2030 strategic roadmap; with this engagement maturing as this model evolves. The department is also working toward a stakeholder survey series to seek views on its performance as a regulator, together with its efforts to deliver an effective and efficient biosecurity system for the future.

Recommendation 6 - agreed

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

The department will routinely report to the Portfolio Audit Committee on its progress implementing Inspector-General of Biosecurity recommendations. In addition to this

reporting, the department is implementing the changes to the Regulatory Performance Guidelines to increase the transparency of our performance as a regulator.

Recommendation 7 - agreed

The department's internal audit functions should include a process to verify appropriate closure of Inspector-General recommendations, including validating evidence.

The Chief Internal Auditor is considering how best to incorporate a periodic review of a sample of closed Inspector-General of Biosecurity recommendations as part of the Internal Audit Program.

Recommendation 8 - agreed

The department should drive and strengthen accountability throughout the department's biosecurity divisions by utilising annual progress reporting against the strategy *Commonwealth Biosecurity 2030*, and the implementation status of Inspector-General review recommendations.

See response to recommendations 2 and 5

Recommendation 9 - agreed

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

The department will seek to strengthen the role and processes that drive the Biosecurity and Compliance Board in its role overseeing the implementation of the Inspector-General recommendations. This will include reviewing the terms of reference and accountability mechanisms to the Director of Biosecurity.

See also response to recommendation 2.

Recommendation 10 - agreed

The Portfolio Audit Committee should be appropriately supported to enable it to advise the Director of Biosecurity on risks to the department's effective delivery of its biosecurity functions as highlighted through Inspector-General reviews and recommendations, and the timeliness and completeness of the implementation of response to recommendations.

The department will explore how it can better support the Portfolio Audit Committee to undertake its role overseeing the Inspector-General of Biosecurity recommendations and the implementation of initiatives to address them. The new Biosecurity and Compliance Board reports to the Director of Biosecurity on biosecurity functions at regular intervals, including to advise of any emerging risks. The Board is supported by a dedicated Risk, Compliance and Assurance sub-committee.

Appendix B

Audit of review recommendations

TABLE 4 Outcomes of the audit of review recommendations

Inspector-General review title	Publication date	Inspector-General review recommendation	Department's original management response	Current Inspector-General's assessment (2021)	Inspector-General's rating
Effectiveness of biosecurity controls for importation of tomato and carrot seeds	May 2016	Recommendation O5: The department should ensure that staff conducting inspections at the border are well trained, aware of biosecurity risks associated with imported seeds, adhere to standard operating procedures and carry inspection kits to minimise cross contamination of imported consignments. The department should update work instructions to ensure up to date information is available to inspecting staff.	The department agrees with this recommendation. The processes outlined in response to Recommendation 2 of this report will also address this recommendation.	<p>The department developed an e-learning training package in 2017 which was updated in 2020. The training has 2 modules:</p> <ul style="list-style-type: none"> Module 1: Introduction to imported seed sampling and inspection provides techniques for small, imported seed consignments. Module 2: Imported seed sampling and inspection – the International Seed Testing Association (ISTA) provides techniques for advanced sampling for larger consignments or consignments requiring inspection using the ISTA rules. <p>Biosecurity officers who work at airports and mail centres need to complete module 1. Biosecurity officers who inspect larger consignments and use the ISTA rules need to complete modules 1 and 2.</p> <p>The department also developed work instructions and reference documents:</p> <ul style="list-style-type: none"> The 'Seed sampling and inspection' work instruction was revised in December 2020. This work instruction contains information about how to undertake sampling and inspection of imported seed and the inspection equipment required to undertake seed sampling and inspections. The 'Assessing and sampling imported seeds for sowing requiring pathogen testing' work instruction was revised in April 2021. This work instruction contains information on how to assess import documentation and sample imported seed lots which require pathogen testing. The 'Seed inspection and sampling' national job card was revised in February 2021. This job card is used to assess biosecurity inspectors' competency to undertake inspections on imported seeds. The 'Seed manual' was revised in August 2020. The manual provides information on the seed importation pathway, biosecurity risk of imported seeds, seed categories and inspection processes. 	Optimal

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TABLE 4 Outcomes of the audit of review recommendations continued

Inspector-General review title	Publication date	Inspector-General recommendation	Department's original management response	Current Inspector-General's assessment (2021)	Inspector-General's rating
Effectiveness of biosecurity controls for importation of tomato and carrot seeds	May 2016	<p>Recommendation 08: In consultation with industry, the department should develop a co-regulatory model that involves industry adopting agreed recommendations and principles to improve the regulatory framework for importation of vegetable seeds into Australia.</p>	<p>The department agrees with this recommendation. The concept and benefits of a co-regulatory model will be discussed and progressed through the Imported Seeds Regulation Working Group.</p>	<p>The department and industry have agreed to adopt a co-regulatory approach that recognises and guides seed production practices through a systems approach, under the guidance of an annex to the International Standards for Phytosanitary Measures 38 (ISPM 38). The department engages with industry related to co-regulatory approaches to managing phytosanitary risk on seed imports.</p> <p>The department has engaged with industry and international counterparts in the following forums and activities:</p> <ul style="list-style-type: none"> • Imported Seed Regulation Working Group, between May 2016 and July 2018 • Organisation of the Global Integrated System of Seed Production Workshop, between 4 and 5 April 2018 • Organisation of the International Clean Seed Pathway Workshop, between 7 and 8 June 2018 • Quadrilateral Seed Health Working Group • supporting the development of an annex to ISPM 38 on the design and use of systems approaches for phytosanitary certification of seeds • supporting the development of regional implementation guidance material on seed health certification for Asia and Pacific Plant Protection Commission member countries • International Seeds Federation systems approach pilot, proposed to take place in 2022. 	Optimal

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TABLE 4 Outcomes of the audit of review recommendations

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Inspector-General review title	Publication date	Inspector-General review recommendation	Department's original management response	Current Inspector-General's assessment (2021)	Inspector-General's rating
Adequacy of preventative border measures to mitigate the risk of African swine fever	March 2020	<p>Recommendation 03: The department should increase screening of express mail service and parcels from African swine fever-affected countries (in addition to China) at targeted mail centres. The outcomes should be recorded electronically in a central register to allow for a quick post-hoc analysis to inform relevant policies and operations.</p>	<p>Agreed. The department has increased screening of mail classes (express mail service, parcels and other articles) from ASF-affected countries with implementation of revised mail profiles commencing in 2020. All detections resulting from the increased screening will be recorded in the Mail and Passenger System (MAPS), and will inform frequent data reporting and analysis performed by the department.</p>	<p>In 2018 the department increased screening on the mail pathway from African swine fever affected countries. The department revised and implemented mail profiles to inform the increased screening in the mail pathway. The department collected and analysed data from the increased screening which informed the profiles and the mail classes and countries that were targeted for screening. This included new profiles for screening, profiles for continued screening and revised profiles for ceasing screening. For example, in 2019 the department ceased increased screening of Other Articles (OAs) from China arriving in Sydney and Melbourne Gateway facilities. The data was analysed and it was identified that OAs did not contain high volumes of porcine products. Therefore, the increased screening rates of 50% for large OAs and 20% for small OAs were reduced to 20% for all OAs.</p>	Optimal
Adequacy of preventative border measures to mitigate the risk of African swine fever	March 2020	<p>Recommendation 12: The department should include additional criteria in risk assessment for flights from African swine fever- affected countries, including a focus on seasonal farm workers.</p>	<p>Agreed. The department has already commenced work to improve the data used to inform traveller risk assessment and will continue to explore opportunities to further refine the best set of criteria. Implementation of the Mobile Passport Reader application that is currently being trialled will provide additional data on traveller intervention.</p>	<p>The department has not provided evidence demonstrating:</p> <ul style="list-style-type: none"> • how they have included additional criteria or refined criteria in risk assessment for flights from African swine fever affected countries • how they have improved the data used to inform traveller risk assessment • the progress and potential implementation of the Mobile Passport Reader application. <p>The department has advised that profiles and criteria are monitored and updated as part of business-as-usual work.</p>	Unsatisfactory

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TABLE 4 Outcomes of the audit of review recommendations continued

Inspector-General review title	Publication date	Inspector-General recommendation	Department's original management response	Current Inspector-General's assessment (2021)	Inspector-General's rating
Pest and disease interceptions and incursions in Australia	May 2019	<p>Recommendation 05: The department should strengthen the implementation of verification programs and data capture about them to ensure that biosecurity risk interception and management systems are performing as intended to support Risk Return Resource Allocation modelling, and that this modelling is not based on outdated or over-optimistic assumptions.</p>	<p>Agreed. The department established a Biosecurity Operations Assurance Model in 2017 to provide a consistent approach to verification and capture qualitative and quantitative data to measure the performance of current management systems. The department will look to strengthen this model to ensure it is operating as intended and data capture supports RRRR and other modelling activity.</p>	<p>The department has not provided evidence demonstrating how they have strengthened the Biosecurity Operations Assurance Model, established in 2017. The department's response outlined that they intended:</p> <ul style="list-style-type: none"> to ensure that the model was operating as intended – that is, as a consistent and reliable approach for verification and data capture to measure the performance of current management systems to strengthen the model to operate and provide data capture to support the Risk Return Resource Allocation (RRRA) model and other modelling activity. <p>The department did provide the independent review report of the RRRR model that was procured in 2019 and the department's response to this review. However, the evidence was not provided on the progress and outcomes of the implementation of the review's recommendations.</p>	Unsatisfactory

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TABLE 4 Outcomes of the audit of review recommendations continued

Inspector-General review title	Publication date	Inspector-General review recommendation	Department's original management response	Current Inspector-General's assessment (2021)	Inspector-General's rating
Biosecurity risk management of international express airfreight pathway for non-commercial consignments	July 2020	Recommendation 24: The department should develop an operational policy framework for biosecurity officers to exercise regulatory powers to issue infringement notices and civil penalties for non-compliance with provisions under the Act relating to the management of biosecurity risk associated with imported goods.	Agreed. The department has an operational policy framework (supported by IT systems and instructional material) for biosecurity officers to issue infringement notices and otherwise deal with non-compliance at first points of entry. Policy and guidance material is also being developed for the broader use of civil sanctions (i.e. infringement notices, civil penalty orders, injunctions and enforceable undertakings).	The department has not developed an operational policy framework for non-compliance or regulatory intervention tools in the non-commercial airfreight pathway as recommended by the Inspector-General of Biosecurity. The department maintains that there are legal, practical and policy reasons it is not possible or feasible for biosecurity officers to issue infringement notices in response to non-compliance in the airfreight pathway. For example, a common breach for which an infringement notice can be issued is the provision of false or misleading information or documents (sections 532 and 533 of the <i>Biosecurity Act 2015</i>). In the airfreight pathway, the self-assessed clearance (SAC) declaration provides basic information about each consignment, including the identity of the sender and importer, consignment details and goods description, delivery location and company or business names. However, the person making a false or misleading declaration is typically overseas and is not subject to an infringement notice. Biosecurity officers working in the airfreight pathway can report suspected non-compliance and escalate compliance action for significant breaches to the department's Enforcement Branch, via the Non Compliance Reporting Form or by contacting the Enforcement Branch directly. They can also engage directly with regional enforcement staff. Under the department's Civil Sanctions Policy, for all pathways with the exception of the airport pathway, a formal investigation of alleged non-compliance is undertaken by an enforcement officer before an infringement notice can be issued for an alleged breach of a civil penalty or strict liability provision. In the airport pathway, biosecurity officers can make an immediate assessment as to whether there is an alleged breach of the Act and can immediately issue an infringement notice.	Unsatisfactory

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TABLE 4 Outcomes of the audit of review recommendations <small>continued</small>					
Inspector-General review title	Publication date	Inspector-General review recommendation	Department's original management response	Current Inspector-General's assessment (2021)	Inspector-General's rating
Hitchhiker pest and contaminant biosecurity risk management in Australia	July 2018	Recommendation 03: The department should prioritise allocating resources to expand the Sea Container Hygiene System, to enable better offshore management of sea container biosecurity risks from more countries and ports.	Agreed. The department will ensure adequate resources are allocated to prioritise expansion of the Sea Container Hygiene System (SCHS) to more countries and ports. However, the uptake of SCHS is dependent on the level of interest shown by industry and overseas government agencies.	<p>The department is progressing the expansion of the Sea Container Hygiene System (SCHS) to additional facilities. The department currently recognises SCHS facilities in Fiji, Papua New Guinea and the Solomon Islands. The work is being completed in 2 phases:</p> <ul style="list-style-type: none"> Phase 1 will expand to facilities that are recognised under the New Zealand Ministry of Primary Industries (NZ MPI) SCHS agreement but not recognised by the department. Phase 2 will expand to recognise new facilities under the SCHS agreement, working in collaboration between the department and NZ MPI. <p>Under phase 1, the department has identified 3 facilities in Port Apia in Samoa, and Port Vila and Luganville Santo in Vanuatu. The department has undertaken preparatory work, including the facilities passing a full desktop audit based on historical compliance intervention data held by the department. The department will engage with the identified facilities to discuss their participation in SCHS with Australia.</p> <p>Under phase 2, the department has identified and will work with NZ MPI to expand the SCHS scheme to new facilities in Lautoka in Fiji, Motukea in Papua New Guinea, and Noumea in New Caledonia. The department needs to undertake preparatory work, including engaging with and undertaking audits of the identified facilities. The department has proposed that these new facilities commence under the SCHS scheme during 2021.</p> <p>The department is also progressing enhancements to S-Cargo. The enhancement will separate Integrated Cargo System (ICS) messaging for S-Cargo and SeaPest, rather than relying on messaging being transmitted through ICS and S-Cargo before being received by SeaPest. The enhancement will move to a processing model instead of relying on individual messages. This will enable the pre-processing of the data and reduce the processing time and workload on the IT systems. The department's testing has shown more than 95% improvement in processing times – for example, reducing the processing of large-scale messaging from 7 hours to under 15 minutes. The enhancements are proposed to be implemented in September 2021.</p> <p>However, the department has closed this recommendation based on their proposed outcomes. The implementation of this recommendation is still in progress.</p>	Satisfactory

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TABLE 4 Outcomes of the audit of review recommendations

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Inspector-General review title	Publication date	Inspector-General review recommendation	Department's original management response	Current Inspector-General's assessment (2021)	Inspector-General's rating
Pest and disease interceptions and incursions in Australia	May 2019	<p>Recommendation 02: The department should ensure that targeted annual rates of cargo compliance verification inspections at all ports are maintained at recommended levels commensurate with increasing container arrival numbers and that all non-compliances are actioned systematically and analysed regularly for trends and opportunities to improve compliance. The department should consider expanding the program beyond full container loads to include additional arrival pathways.</p>	<p>Agreed. The department is committed to the expansion of the cargo compliance verification (CCV) program and maintaining targeted annual rates of inspections as volumes increase. The department has a system in place to capture and action reported cases of non-compliance identified through CCV inspections. This information is used for trend analysis and to identify opportunities to improve compliance. Similarly, arrangements for end-point surveys are in place for international travellers and mail. The transition to automated profiling for travellers in 2018 also allows the department to quickly implement and/or change cohort and random profile selection rates for biosecurity screening at the border.</p>	<p>The department commenced the Air Cargo Assurance Program (ACAP) in 2020. The first priority for ACAP was to implement the Air Cargo Compliance Verification (ACCV) for the non-commercial airfreight pathway. The ACCV is a statistical based verification process to test the effectiveness of regulatory controls for managing biosecurity risks and verifying compliance in non-commercial airfreight (i.e. self-assessed clearance (SAC) consignments). SAC ACCV profiles in the Integrated Cargo System randomly refer a percentage of SAC consignments managed by Conference of Asia Pacific Express Carriers (CAPEC) to the department's Import Management System for verification inspection. SAC ACCV targets SAC consignments that are usually not referred to the department or released based on documents. In May 2021, there were 5,684,481 entries lodged in ICS and 527 entries were referred for ACCV documentation assessment, including 512 entries that were referred for ACCV inspection.</p>	Optimal

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TABLE 4 Outcomes of the audit of review recommendations continued

Inspector-General review title	Publication date	Inspector-General review recommendation	Department's original management response	Current Inspector-General's assessment (2021)	Inspector-General's rating
Environmental biosecurity risk management in Australia	April 2019	<p>Recommendation 05: The department should establish a dynamic and transparent environmental pest and disease risk prioritisation process, informed by new scientific knowledge, to allow emerging environmental pests and diseases to be added to the priority list as they arise. This list of priority environmental biosecurity pests and diseases, with the basis for their inclusion, should be published on the department's website and continuously reviewed.</p>	<p>Agreed. The department is working with ABARES to prepare and finalise the National Priority List of Exotic Environmental Pests and Diseases. Once the process is complete and each of the sectoral committees (Environment and Invasives Committee, Animal Health Committee, Marine Pests Sectoral Committee, Plant Health Committee) have been consulted on the list, the department will engage stakeholders and ensure thorough consultation on the draft list. Following consultation, the list and final report will go to the Environment and Invasives Committee and the National Biosecurity Committee for endorsement. The priority list, along with the basis for pest & disease inclusion, will be published on the department's website. The Environmental Biosecurity Office and Chief Environmental Biosecurity Officer will play a key role in using the data from the list to develop policies that guide priority areas of work in environmental biosecurity. The list will be routinely reviewed every five years, with the first review to occur in three years. The review will include revision of the purpose, use, criteria and methodology. Provision will also be made for ad-hoc amendments to the list, which will allow for the timely addition or removal of a species to ensure that the list remains up to date. This process will be coordinated through the Environment and Invasives Committee, in consultation with the relevant sectoral committees.</p>	<p>The department, through the Australian Bureau of Agricultural and Resource Economics and Sciences (ABARES), led the development of the National Priority List of Exotic Environmental Pests, Weeds and Diseases (EEPL), which included a subset list of higher risk species. The EEPL was endorsed by the Environment and Invasives Committee in early 2020 and finalised for release by the National Biosecurity Committee in October 2020. The EEPL is published on the department's website. The EEPL identifies 168 exotic species of significant risk to Australia's environment and social amenity. The subset list of higher risk species identifies 42 species that pose a higher overall risk to the environment and was compiled from the top 5 or 6 species across 8 biological groups in the EEPL. Ad Hoc Provisions have also been developed that outline the governance, roles, responsibilities and procedures for amending and managing the EEPL. Through a stakeholder consultation process the Australian Chief Environmental Biosecurity Officer (ACEBO) drafted the EEPL Implementation Plan in early 2021. This implementation plan categorises and prioritises actions for the Commonwealth and stakeholders that will mitigate the risk of entry, establishment and spread of EEPL species in the environment.</p>	Optimal

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