



Australian Government
**Department of Agriculture,
Fisheries and Forestry**

INTERIM INSPECTOR GENERAL OF BIOSECURITY

Interim Inspector General of Biosecurity

Dr Kevin Dunn

Annual Report 2010-11

To Senator the Hon Joe Ludwig

Minister for Agriculture, Fisheries and Forestry

Table of contents

INTRODUCTION.....	1
THE ROLE OF THE INTERIM INSPECTOR GENERAL OF BIOSECURITY.....	1
INTERIM INSPECTOR GENERAL OF BIOSECURITY ACTIVITIES IN 2010-11	2
Prawn consignment incident review	3
Pre-border operations audit (offshore risk management measures for the importation of nursery stock)	3
Audit of quarantine operations (risk management of entry pathways for citrus canker)	4
Horse pre-export operations and procedures at Japan desktop review activity.....	4
PREVIOUS ACTIVITIES OF THE INTERIM INSPECTOR GENERAL OF BIOSECURITY.....	5
KEY THEMES	5
2011-12 AND FUTURE YEARS	6

Introduction

The biosecurity services delivered by the Department of Agriculture, Fisheries and Forestry (the department) have remained the focus of audit and review activity for the Interim Inspector General of Biosecurity over 2010-11. These services, while vast in scope and depth, are directed at delivering key biosecurity functions, for our primary industry, environment and public health sectors of Australia. The Interim Inspector General of Biosecurity role is to provide the Minister with independent assurance, through audit and review, of the performance and appropriateness of the biosecurity systems and risk management measures that are the responsibility of the department's biosecurity divisions.

In setting the Interim Inspector General of Biosecurity work program, I have taken close account of the audit reports and work programs of the department's internal audit processes and other external audit bodies such as the Australian National Audit Office. This has helped to strategically target the Interim Inspector General of Biosecurity activities, to avoid duplication and to ensure the appropriate timing of independent review of the range of the department's biosecurity programs. I am pleased to report that significant progress has been made this year in the establishment and development of the skills (particularly auditing) that are provided by the department's Biosecurity Secretariat to support the role and function of the Interim Inspector General of Biosecurity.

In 2010-11, the Interim Inspector General of Biosecurity program focussed on:

- developing and the deployment of an audit, administrative and management skills base within the Biosecurity Secretariat that provides dedicated support to the Interim Inspector General of Biosecurity
- maturing the forward planning process for Interim Inspector General of Biosecurity activities to deliver risk-based systems audits across the biosecurity continuum (pre-border/offshore, border, and post-border/onshore)
- expanding the range of Interim Inspector General of Biosecurity activities that deliver reports, recommendations and advice to the minister to support continual improvement to Australia's biosecurity systems
- consolidating the Interim Inspector General of Biosecurity stakeholder communications processes with the minister's office, the department's biosecurity divisions and internal audit, and Animal Health Australia and Plant Health Australia
- undertaking a comparative study of the biosecurity audit and verification systems that exist in United States of America and Canadian governments.

The role of the Interim Inspector General of Biosecurity

The Interim Inspector General of Biosecurity is a transitional role while the future statutory position of the Inspector General of Biosecurity is being developed under the Australian Government's proposed amendments to biosecurity legislation.

On 1 July 2009, the government appointed me as the Interim Inspector General of Biosecurity. The Interim Inspector General of Biosecurity role continues with a broad scope to audit, investigate and review the biosecurity systems and risk management measures that are the responsibility of the department's biosecurity divisions. The Interim Inspector General of Biosecurity role subsumed that of the Interim Inspector General of Horse Importation, which was established following the inquiry concerning the outbreak of Equine Influenza in Australia in 2007.

The Interim Inspector General of Biosecurity role remains independent of the department's biosecurity divisions. The Interim Inspector General of Biosecurity continues to report to the Minister for Agriculture, Fisheries and Forestry and intends to make key findings and recommendations publicly available. The Interim Inspector General of Biosecurity remains accountable to the Secretary of the Department of Agriculture, Fisheries and Forestry on matters of governance and administration. Administrative support to the Interim Inspector General of Biosecurity continues to be provided by a dedicated secretariat team in the Corporate Services Division.

Interim Inspector General of Biosecurity activities in 2010-11

Table 1 outlines the activities undertaken by the Interim Inspector General of Biosecurity in 2010-11, while a summary of each activity follows. An audit of aquarium fish also commenced in May 2011 and will continue in 2011-12.

Table 1 Audit activities undertaken by the Interim Inspector General of Biosecurity in 2010-11.

Audit title and objective	Type of activity
An examination of what caused a consignment of imported raw peeled prawns that tested positive for White Spot Syndrome Virus to be mistakenly released into Australia by the Biosecurity Services Group.	Incident review report
An examination of the likelihood of imported raw peeled prawns that tested positive for White Spot Syndrome Virus and were mistakenly released into Australia by the Biosecurity Services Group entering high risk pathways and of then causing White Spot Syndrome Virus to establish in Australia.	Incident review report
An examination of the performance of the systems that the department's biosecurity divisions have in place to detect and mitigate biosecurity risks before they get to Australia's border - importation of plant nursery stock.	Audit report
An examination of the performance of the systems that the department's biosecurity divisions have in place to manage biosecurity risks along entry pathways - citrus canker.	Audit report
Pre-export procedures for horses from Japan.	Desktop review report

Prawn consignment incident review

In 2010, I examined what caused a consignment of imported raw peeled prawns that tested positive for the prawn disease White Spot Syndrome Virus to be erroneously released into Australia. This was undertaken in two parts: part one examined what caused the incident; part two examined the likelihood of the prawns entering high-risk pathways and of then causing White Spot Syndrome Virus to establish in Australia.

Part one found that human error and/or oversight was the most likely cause that led to prawns being released by the department and recommended a range of measures to reduce the risk of this happening again. Part two found that there was an extremely low likelihood of the raw peeled prawns entering high risk pathways and a negligible likelihood of them then causing White Spot Syndrome Virus to establish in Australia.

The department accepted all the recommendations in the review.

In mid 2011, I sought an update from the department on what action(s) have been undertaken since my review. I am advised that the department has:

- implemented the new measures on all new imports permits for raw prawns
- progressed the development of a system interface between the laboratory and the Australian Quarantine Inspection Service Import Management System, although the development of the interface will take time and will be considered in the context of emerging information and communications technology strategies
- reviewed the consistency of release processes throughout the regional offices and assessed other opportunities for improvement
- implemented additional controls with respect to implementing nationally consistent reporting and reviewing of laboratory test results
- reviewed and updated the relevant work instruction.

I am satisfied from the Interim Inspector General of Biosecurity perspective that the appropriate procedures and operations have been amended where necessary.

Pre-border operations audit (offshore risk management measures for the importation of nursery stock)

In 2011, I examined the systems that the department has in place to detect and mitigate biosecurity risks before they get to Australia's border. For this audit, I looked specifically at risk management measures for pests and diseases of plants that could be introduced into Australia via imported plant nursery stock. The case studies were of sudden oak death, approved sources of tissue culture free of media and *Phalaenopsis* nursery stock from Taiwan.

I reviewed how the department monitors, accesses and assesses information regarding global risks associated with the importation of plant nursery stock and how this information is then used to set the department's biosecurity risk management measures. I also examined the development and management of offshore quarantine schemes and arrangements.

From these audit activities I found that the systems that the department has in place to detect and mitigate biosecurity risks before they get to Australia's border could be strengthened by the department in five key areas:

- accountabilities and responsibilities for the monitoring, gathering and assessment of biosecurity information
- communication regarding Australian import conditions
- approval, auditing, monitoring and review processes
- engagement with National Plant Protection Organisations
- consistent guidance material for the departmental biosecurity officers.

I made 11 recommendations to help the department strengthen these five areas.

Audit of quarantine operations (risk management of entry pathways for citrus canker)

In 2011, I examined the systems that the department has in place to manage biosecurity risks along potential entry pathways to Australia for citrus canker.

I noted that a good system is in place to manage post entry quarantine for imported citrus plants along the regulated pathway (consignments of citrus budwood) for citrus canker. I made two recommendations to further strengthen the department's risk management measures.

From these audit activities, I found that the risks associated with citrus fruit carried by international air passengers appeared to well-managed by the systems the department currently has in place. I made two recommendations to support the department's transition to a new risk based approach of assessing and screening air passengers.

I found that the biosecurity risks of citrus canker are well managed by the department along the Northern Australia Quarantine Strategy zone pathway. I made one recommendation to address a potential challenge in the way information and data is captured and shared across the various agencies operating in Australia's northern region (i.e. how the department accesses information and data on biosecurity and quarantine), and one recommendation in relation to the department's branding and communication.

Horse pre-export operations and procedures at Japan desktop review activity

In 2011, I undertook a desktop review of reports and other records prepared by the department's biosecurity divisions in relation to horse pre-export operations and procedures in Japan.

I also reviewed the import health certification and the department's biosecurity pre-export quarantine inspection documentation from an initial horse consignment after the resumption of horse imports from Japan following the 2007 Equine Influenza outbreak in Australia.

I was satisfied that the relevant operations and procedures were conducted in accordance with the department's biosecurity import permit requirements for horse pre-export quarantine operations and procedures in Japan.

Previous activities of the Interim Inspector General of Biosecurity

During compilation of this 2010-11 annual report, I requested an update from the department's biosecurity divisions on the actions they have undertaken since my previous Interim Inspector General of Biosecurity report findings and recommendations, in 2009-10 including the prawn consignment incident review.

A copy of the department's response is at Attachment A to this report.

Overall, I am satisfied from the Interim Inspector General of Biosecurity perspective that the appropriate procedures and operations have been amended where necessary. However, I note that the department has indicated some areas they are currently addressing or are to address. I expect to continue monitoring such actions in my role as the Interim Inspector General of Biosecurity, and will advise you in my future annual and other reports.

Key themes

The 2010-11 year saw a number of enhancements being made by the Interim Inspector General of Biosecurity and Biosecurity Secretariat, to the focus and operation of Interim Inspector General of Biosecurity activities.

The Interim Inspector General of Biosecurity role is maturing, now having been in operation for two years, since July 2009. An emphasis has been placed on ensuring a balance of activities in the Interim Inspector General of Biosecurity's program. Previous findings on biosecurity issues have been taken into account where relevant to the Interim Inspector General of Biosecurity program, such as the Equine Influenza inquiry in 2008, the One Biosecurity review in 2008 and independent reports by Dr Peter Shergold to the Minister in 2008 and 2009 assessing the implementation of the government's response to the Equine Influenza inquiry.

The Interim Inspector General of Biosecurity activities continue to move towards giving appropriate coverage across the biosecurity continuum (offshore (pre-border), border, and onshore (post-border)), considering the likely pathways of pest or disease entry and the entry of commodities that may be of biosecurity concern, while being mindful of new and emerging biosecurity risks as well as those which are ever present. The program also allocates some days to undertake, at the Minister's request, ad-hoc or incident reviews should the need arise.

In relation to horses, my previous role as the Interim Inspector General of Horse Importation was subsumed by the Interim Inspector General of Biosecurity role. A streamlined approach to the way the Interim Inspector General of Biosecurity audits the operations and standards of offshore

horse pre-export quarantine facilities is proposed as of July 2011. This will enable a more regular stocktake of Interim Inspector General of Biosecurity pre-export quarantine activities, as well as helping to ensure that appropriate auditing attention is given to horses, other commodities and other aspects of the department's biosecurity risk-management systems.

Other inputs to the Interim Inspector General of Biosecurity program include stakeholder consultation. Over 2010-11, I met with Animal Health Australia, Plant Health Australia, and also agricultural departments in the United States of America and Canada to learn from their audit, review and verification experiences. These linkages will be maintained or expanded, particularly with domestic stakeholders, to help inform the Interim Inspector General of Biosecurity and Biosecurity Secretariat in the development of the forward program of audit and review activities and more broadly to understand what are relevant biosecurity issues affecting their industries.

Some broader issues have also had flow-on effects to the Interim Inspector General of Biosecurity role. This has included the pace of the development of the biosecurity legislative reforms, which provide for the Inspector General of Biosecurity statutory function. The development and implementation of the department's biosecurity risk return approach is of interest especially with regard to implications for the areas that the Interim Inspector General of Biosecurity may seek to audit and review. Lessons have also been learnt over the past two years of operation of the Interim Inspector General of Biosecurity role, to refine the way in which audits and reviews are conducted to be most efficient and effective, and also to provide quality and timely reports to the Minister for Agriculture, Fisheries and Forestry.

2011-12 and future years

The performance of the department's biosecurity divisions has remained the principal focus of my audit and review activities during 2010-11.

In 2011-12, the Interim Inspector General of Biosecurity aims to continue broadening the scope of activities across the biosecurity continuum, including the effectiveness of the department's controls for imported aquarium fish, the effectiveness of the department's controls for imported uncooked pig meat, the department's risk management measures for imported animal breeding material and the department's systems to manage risks with the entry of international mail and products purchased online and sent via mail or courier.

In subsequent years, areas that are under consideration as Interim Inspector General of Biosecurity activities include aspects of the importation of animal and plant products, risk management for overseas pests of agricultural products in storage or transportation such as grains, the inspection and clearance processes for defence and military equipment returning to Australia, the regulation of approved facilities that are permitted to import and use living cultures of micro-organisms that are otherwise not present in Australia and social or amenity pest risks that exist in the movement of people or goods such as those which may impact on the environment, industry or the natural environment.

In addition, the findings of Interim Inspector General of Biosecurity activities conducted in 2009-10 and 2010-11 will be revisited appropriately. A continuous improvement approach to the management and delivery of biosecurity systems, tested by independent audit, is an enduring principle in the conduct of the Interim Inspector General of Biosecurity role.

A handwritten signature in black ink, appearing to read 'K. J. Dunn', written in a cursive style.

Dr Kevin Dunn
Interim Inspector General of Biosecurity
July 2011

DAFF Biosecurity's response to the IIGB's previous reports

Prawn consignment incident review (November 2010)

The department has implemented the new measures as recommended by the IIGB on all new imports permits for raw prawns. The IIGB also recommended the development of a system interface between the laboratory and the AQIS Import Management System to reduce the risk of human error. The department is currently progressing with this proposal, although the development of the interface will take time and will be considered in the context of emerging information and communications technology strategies. The department has reviewed the consistency of release processes throughout the regional offices and assessed other opportunities for improvement. It has also implemented additional controls with respect to implementing nationally consistent reporting and reviewing of laboratory test results. The work instruction has also been reviewed and updated.

Australian Veterinary Emergency Plan (AUSVETPLAN) (June 2010)

The department remains committed to supporting the development and maintenance of AUSVETPLAN – a core program of Animal Health Australia (AHA). AHA delivers the project management mechanisms for AUSVETPLAN through the AHA AUSVETPLAN management team. The department maintains the provision of technical input and participates in AHA's AUSVETPLAN Technical Review Group. This group meets face-to-face twice a year with other communications out of session. The department is currently undertaking a self-assessment of its emergency preparedness and response and disease surveillance functions under the National Animal Health Performance Standards – a project previously adopted by the Primary Industries Ministerial Council. The outcomes of this self-assessment are due to be reported by 1 July 2011.

Management of quarantine waste from international vessels at Australian seaports (June 2010)

Following the IIGB's recommendation, the department now verifies by means of official on-site inspection that the operations of approved deep burial facilities include the immediate covering of all unloaded quarantine waste. The department is currently reviewing the quarantine waste management policy which is expected to be finalised by July 2011. The department is also reviewing the risks associated with quarantine waste which will include assessing and realigning current co-regulatory arrangements. This is expected to be finalised by December 2011.

Quarantine surveillance following post-arrival quarantine for specified horses after importation to Australia (May 2010)

A new work instruction on quarantine surveillance following post-arrival quarantine for specified horses after importation to Australia is now in effect. This instruction addresses the issues raised by the IIGB, including record-keeping and notification responsibilities and requirements, communication between regions and travel plans for post-arrival quarantine facility to the surveillance facility.

Assessment of the department's internal audit of Sandown post-arrival quarantine facility (June 2010)

The Sandown post-arrival quarantine facility is no longer in existence. A different legislative mechanism was used for the approval of the replacement post-arrival quarantine facility at Werribee, Victoria. The department placed stringent requirements for approval and oversight of this facility is high. The department developed a work instruction on the management of quarantine approved premises for post arrival quarantine surveillance which provides detailed guidance to regional staff involved in this activity. The issues identified as a result of the assessment of Sandown were incorporated into the requirements for

the Werribee facility and were in place for the 2010 intake of spring carnival horses that were quarantined at the Werribee facility. Operators of the Werribee facility, in conjunction with the department, developed standard operating procedures and document control and record keeping were monitored throughout the 2010 intake. The department issued corrective action request for any breaches of the standard operating procedures and follow-up audits were conducted to confirm non-conformities had been addressed.

Import health certification for horses imported to Australia (November 2009)

In response to the IIGB's recommendations, the department has strengthened requirements for full health certification to be provided for all horses that enter pre-export quarantine, irrespective of whether they are intended for export. This is now also a requirement in each post-entry quarantine facility's standard operating procedure manual, the development of which is a prerequisite for approval of the facility.

Equine pre-export procedures in Singapore (July 2010)

The department continues to remind all countries of the requirement for nasopharyngeal swabbing as part of the renewal process for pre-export quarantine facility approvals.