



Australian Government  
Inspector-General of Biosecurity

# Implementation of Interim Inspector-General of Biosecurity recommendations

Review report No. 2018–19/03



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## Chapter 1

# Background

In July 2009 the Australian Government appointed an Interim Inspector-General of Biosecurity (IIGB) to independently evaluate and verify the adequacy of then Department of Agriculture, Fisheries and Forestry pre-border, border and post-border biosecurity risk management programs. Dr Kevin Dunn was appointed IIGB from July 2009 to June 2013, and Dr Michael Bond from July 2013 to June 2016. Under the *Biosecurity Act 2015* (Cth), the Australian Government appointed Dr Helen Scott-Orr as inaugural Inspector-General of Biosecurity (IGB) from July 2016 for three years.

The IIGBs published 31 reviews or audits, and most included recommendations for departmental action. Of the audits, 11 related to horse importation, one to abalone exports and one to the Australian Veterinary Emergency Plan (AUSVETPLAN). In August 2015 and April 2016 the IIGB published audits (Interim Inspector-General of Biosecurity 2015 and 2016) of the implementation of recommendations of previous IIGB reviews. By August 2018 the IGB had completed another four reviews. The IGB work program for 2017 to 2019 includes a review of departmental actions to address recommendations included in IIGB and previous IGB audits and reviews.

## Chapter 2

# Review process

The purpose of this desktop review was to audit how the Department of Agriculture and Water Resources (the department) has ensured that IIGB audit and review recommendations have been adequately considered and implemented, and how their wider lessons have informed ongoing reform of the Australian biosecurity system.

The objectives of the review were to:

- examine departmental processes for ensuring appropriate implementation of IIGB and IGB review recommendations
- provide an overview of completed and outstanding work, and
- consider how the department ensures that wider lessons from selected reviews inform ongoing reform of Australia's biosecurity system.

The scope of this review was:

- to assess the adequacy of recording and follow-up of recommendations in the departmental database (eTRAC) to track and update progress on high-level departmental actions and decisions, and recommend improvements to departmental processes as appropriate
- to consider how recommendations from 15 IIGB reviews relating to issues managed through the *Quarantine Act 1908* were implemented over time.

I did not consider:

- IIGB audits of horse importation, because I examined these in another review (Inspector-General of Biosecurity 2018)
- IIGB audit of export or post-border issues (Interim Inspector-General of Biosecurity 2014), because this was outside my remit
- IIGB audits of prawn imports (Interim Inspector-General of Biosecurity 2010 and Interim Inspector-General of Biosecurity 2011), because I had considered these in another review (Inspector-General of Biosecurity 2017).

I reviewed departmental processes used to assign responsibility for and track implementation, reporting and review of decisions and actions arising from IIGB recommendations. These included roles of line areas, the internal audit team and the IGB unit.

I carried out a desk audit of 15 IIGB audits and 96 recommendations (Table 1). For each review, I recorded:

- the original recommendations
- departmental responses to each recommendation at the time of publication
- subsequent actions against each recommendation
- whether implementation of each recommendation had been marked as complete by the department and/or listed for further review by the IIGB in 2015 or 2016 audits
- my queries about specific recommendations not listed as closed, or about further evidence of continued implementation of the recommendation as appropriate to address biosecurity risks satisfactorily.

For each audit I prepared a table containing this information. In April 2018 I referred these tables to the department and sought response to my queries.

I also considered generic issues identified by the IIGB in 2015 (Interim Inspector-General of Biosecurity 2015) for re-examination in future IGB reviews or for active departmental review.

**TABLE 1** Interim Inspector-General of Biosecurity audits reviewed and queried

IIGB report title	Date published	Recommendations (no.)	IGB queries (no.)
Effectiveness of biosecurity controls for importation of tomato and carrot seeds	May 2016	12	7
Management of biosecurity risks associated with timber packaging and dunnage	May 2016	8	7
Effectiveness of biosecurity controls for importation of natural sausage casings	October 2015	4	1
Effectiveness of biosecurity controls for importing stockfeed of plant origin	June 2015	7	7
Managing biosecurity risks associated with international online purchases	March 2015	6	1
Effectiveness of biosecurity controls for imported fresh cut flowers	February 2015	6	5
Effectiveness of biosecurity controls for imported animal breeding material (mammalian semen and embryos)	December 2014	4	1
Importation of untanned animal hides from Colombia in 2012–13	February 2014	10	1
The effectiveness of controls for imported uncooked, cooked and cured pig meat	December 2013	4	4
An examination of the effectiveness of Department of Agriculture, Fisheries and Forestry controls to manage biosecurity risks in the importation of freshwater and marine ornamental fish	December 2013	6	4
Undeclared importation of food from the Republic of Korea detected in December 2010	August 2013	4	0
An examination of factors that led to release into Australia of a consignment of soil (declared as fertiliser) and interception at the border of another consignment of soil (declared as fertiliser)	June 2012	4	2

continued ...

**TABLE 1** Interim Inspector-General of Biosecurity audits reviewed and queried continued

IIGB report title	Date published	Recommendations (no.)	IGB queries (no.)
An examination of the performance of the systems that the biosecurity divisions of the Department of Agriculture, Fisheries and Forestry has in place to detect and mitigate biosecurity risks before they get to Australia's border—importation of plant nursery stock	August 2011	11	2
An examination of the performance of the systems that the biosecurity divisions of the Department of Agriculture, Fisheries and Forestry has in place to manage biosecurity risks along entry pathways—citrus canker	August 2011	6	4
Management of quarantine waste from international vessels at Australian seaports	July 2011	4	1
<b>Total</b>		<b>96</b>	<b>47</b>

Note: [Completed audits and reviews](#) are available on the Inspector-General of Biosecurity website.



## Chapter 3

# Findings

### **Process for tracking decisions and actions to implement recommendations**

From 2010 the department recorded and individually numbered all Interim Inspector-General of Biosecurity (IIGB) audit recommendations in eTRAC, its decision- and action-tracking system. Between October 2014 and March 2017, the IIGB was co-located with the departmental internal audit team, and this team had responsibility for recording and monitoring decisions and actions on audit recommendations. After the Inspector-General of Biosecurity (IGB) was established, the IGB unit took on this responsibility due to its greater independence from the department. The process for capturing and reviewing information on decisions and actions on audit recommendations changed, leading to some confusion and potential for gaps or duplication and inefficiency.

A wide range of departmental staff across business areas were responsible for ensuring that IIGB recommendation follow-up actions were taken and recorded in eTRAC. This resulted in some lack of clarity on which divisions, branches and positions were responsible for implementing recommendations and recording actions in eTRAC—exacerbated by departmental restructures and staff changes during the eight years in which IIGB audits had been conducted. Consequently, some corporate knowledge and responsibility for implementing recommendations was lost. IIGBs and departmental staff considered recommendations individually rather by review, so some staff had little overview of how individual actions contributed to overall biosecurity outcomes in particular areas. The department remedied this to some extent for this review by assigning each IIGB audit to a single ‘risk owner’ for compilation of all responses.

The department was implementing the online governance tool Planning Hub at the time of this review. Planning Hub has seven interlinking modules covering areas including business planning, risk planning and management, and project planning and reporting. This should enable the department to strengthen its governance and performance oversight.

The 'Action Tracker' Planning Hub module enables the department to track and progress actions and decisions arising from committees and governance boards. The module can also be used to capture and track tasks to be completed as part of a project. Action Tracker will replace eTRAC. To retain corporate knowledge, the department must ensure that significant issues recorded in eTRAC are transferred and clearly followed up in Action Tracker.

The department did not apply its normal systems for overseeing implementation of decisions and actions arising from other audit and review processes (such as ANAO and internal audits) to IIGB and IGB recommendations, to avoid perception of interference with IGB independence. However, IIGB and IGB audits and reviews, with departmental responses to recommendations, and IIGB reports on their implementation, are already in the public domain. I consider that oversight of this implementation should be improved and integrated with other departmental processes.

### **Recommendation 1**

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 and IGB audits and reviews. It should also integrate them with processes for tracking responses to internal audits and ANAO 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.

#### ***Department's response:*** Agreed

The department will use the Planning Hub – 'Action Tracker' module to enter and track the implementation of recommendations arising from IGB reviews. This will facilitate transparency of actions and link responses to IGB reports with responses to ANAO and internal audit reports. Relevant risk owners in the Biosecurity group will be responsible for ensuring recommendations are implemented.

Note: The full departmental response to the recommendation is at [Appendix A](#).

## Implementation of recommendations over time

I asked the department about implementation of 47 recommendations in the 15 IIGB reviews I considered. These queries related to recommendations that:

- were not recorded as having been implemented and/or closed by the department. These recommendations were mainly in recent reviews where their implementation would require complex changes or planning that could not be done quickly
- were recorded as having been closed by the department because intentions or processes had been put in place to implement the recommendations, but the department had not provided evidence of implementation adequate to achieve the envisaged outcomes—creating the risk that outcomes might not be achieved if intentions were not actioned, or
- were recorded as having been satisfactorily implemented and closed by the department, but further evidence was sought to demonstrate that the department had continued implementation over time—addressing the risk that satisfactory implementation might have lapsed or waned due to pressure of other work or loss of corporate knowledge.

The department's responses to these queries provided evidence of satisfactory progress with ongoing implementation and/or completion of actions addressing nearly all recommendations.

Full implementation of some recommendations required collaborative action with external parties, with timescales outside departmental control. Nevertheless, I found evidence that the department was actively pursuing these through negotiations with the relevant parties.

A number of the recommendations and responses concerned issues which are highly relevant to other reviews in the IGB 2018–19 review work plan—notably reviews of approved arrangements, interceptions and incursions, and pre-border certification (Table 2). This demonstrated the value of periodic review of past IIGB and IGB audits and reviews.

**TABLE 2** Inspector-General of Biosecurity queries to department about implementation of Interim Inspector-General of Biosecurity audit recommendations

<b>IIGB report title</b>	<b>Recommendation no. a</b>	<b>Reason for query</b>
Effectiveness of biosecurity controls for importation of tomato and carrot seeds	1, 3, 5, 10, 12	Not closed by department
	2, 8	Closed by department due to intent or process to implement
	4	Closed by department with evidence of past implementation
Management of biosecurity risks associated with timber packaging and dunnage	<b>1b, 8d</b>	Closed by department with evidence of past implementation
	<b>2b, 3, 4d, 5d, 6d</b>	Closed by department due to intent or process to implement
Effectiveness of biosecurity controls for importation of natural sausage casings	3	Closed by department with evidence of past implementation
Effectiveness of biosecurity controls for importing stockfeed of plant origin	1, <b>2c</b> , <b>3c</b> , 4, 5, 7	Closed by department with evidence of past implementation
Managing biosecurity risks associated with international online purchases	1	Closed by department with evidence of past implementation
Effectiveness of biosecurity controls for imported fresh cut flowers	<b>1b, 3b, 4b</b>	Closed by department due to intent or process to implement
	5, 6	Not closed by department
Effectiveness of biosecurity controls for imported animal breeding material (mammalian semen and embryos)	<b>1c</b> , 4	Closed by department with evidence of past implementation
An examination of the effectiveness of Department of Agriculture, Fisheries and Forestry controls to manage biosecurity risks in the importation of freshwater and marine ornamental fish	1, 3, 4	Closed by department with evidence of past implementation
The effectiveness of controls for imported uncooked, cooked and cured pig meat	<b>1c, 2b, 3b, 4b</b>	Closed by department with evidence of past implementation
Importation of untanned animal hides from Colombia in 2012–13	8	Closed by department with evidence of past implementation
Undeclared importation of food from the Republic of Korea detected in December 2010	2	Closed by department with evidence of past implementation
An examination of factors that led to release into Australia of a consignment of soil (declared as fertiliser) and interception at the border of another consignment of soil (declared as fertiliser)	1	Closed by department with evidence of past implementation

continued ...

**TABLE 2** Inspector-General of Biosecurity queries to department about implementation of Interim Inspector-General of Biosecurity audit recommendations continued

IIGB report title	Recommendation no. <b>a</b>	Reason for query
An examination of the performance of the systems that the biosecurity divisions of the Department of Agriculture, Fisheries and Forestry has in place to detect and mitigate biosecurity risks before they get to Australia's border—importation of plant nursery stock	2, 7 <b>c</b>	Closed by department with evidence of past implementation
An examination of the performance of the systems that the biosecurity divisions of the Department of Agriculture, Fisheries and Forestry has in place to manage biosecurity risks along entry pathways—citrus canker	1, 2, 3, 4 <b>d</b>	Closed by department with evidence of past implementation
Management of quarantine waste from international vessels at Australian seaports	1 <b>b</b>	Closed by department with evidence of past implementation

**a** Original recommendation no. **b** To be considered by IGB in 2018–19 approved arrangements review. **c** To be considered by IGB in 2018–19 pre-border certification review. **d** To be considered by IGB in 2018–19 interceptions and incursions review.

Note: [Completed audits and reviews](#) are available on the Inspector-General of Biosecurity website.

## Chapter 4

# Conclusion

I agree with the Interim Inspector-General of Biosecurity (2016) that the solid and ongoing rate of implementation of IIGB recommendations demonstrates that the department has continued its commitment to continuous improvement in biosecurity risk management. Future streamlining of internal processes to track implementation will support this.

An annual review of departmental implementation of IGB review recommendations would be appropriate, and I will include another review in my 2018–19 work plan.

A handwritten signature in black ink, appearing to read 'H. Scott-Orr'.

**Dr Helen Scott-Orr PSM**  
Inspector-General of Biosecurity  
27 September 2018

## Appendix A

# Agency response



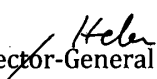
**Australian Government**  
**Department of Agriculture**  
**and Water Resources**

**SECRETARY**

Ref: EC18-000427

Dr Helen Scott-Orr PSM  
Inspector-General of Biosecurity  
PO Box 657  
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Via Email: [InspGenBiosecurity@agriculture.gov.au](mailto:InspGenBiosecurity@agriculture.gov.au)

  
Dear Inspector-General

Thank you for your letter of 7 September 2018 about your review report, *Implementation of Interim Inspector-General of Biosecurity recommendations*, and the opportunity to provide a response to your findings and recommendation.

The department agrees with the recommendation in the report. I am pleased to inform you that work towards addressing the recommendation has already commenced.

Specific comments in response to the recommendation are provided at Annex A.

If you require any further clarification on our comments, please contact Mr Matthew Koval, A/g Deputy Secretary on 02 6272 5014, or by email to [Matthew.koval@agriculture.gov.au](mailto:Matthew.koval@agriculture.gov.au).

Yours sincerely



Daryl Quinlivan

27 September 2018

**ANNEX A****Department of Agriculture and Water Resources responses to recommendation****Recommendation 1**

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 and IGB audits and reviews. It should also integrate them with processes for tracking responses to internal audits and ANAO 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.

***Response:***

Agreed.

The department will use the Planning Hub – ‘Action Tracker’ module to enter and track the implementation of recommendations arising from IGB reviews. This will facilitate transparency of actions and link responses to IGB reports with responses to ANAO and internal audit reports. Relevant risk owners in the Biosecurity group will be responsible for ensuring recommendations are implemented.



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