



Australian Government  
Inspector-General of Biosecurity

# Implementation of Inspector-General of Biosecurity recommendations

Review report No. 2019–20/02



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#### Review team

Dr Naveen Bhatia and Fatima Merhi assisted the Inspector-General with this review.

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## Chapter 1

# Background

In July 2016 the Australian Government appointed me as the inaugural Inspector-General of Biosecurity (IGB)—on a part-time basis for a three-year term—to independently review and report on the adequacy of the Department of Agriculture’s pre-border, border and post-border biosecurity risk management programs. I reviewed various issues managed through the *Biosecurity Act 2015* and how consideration of wider lessons from these reviews may inform ongoing reform of the Australian biosecurity system.

Between July 2016 and July 2019, I published ten reviews that included recommendations for departmental action (Table 1). A further review on *Pre-border certification as a biosecurity risk management measure* is in preparation for completion later in 2019.

**TABLE 1** Reviews completed by the Inspector-General of Biosecurity, July 2016 July 2019

IGB report title	Date published	Recommendations (no.)
Review of Department of Agriculture and Water Resources management of biosecurity risks posed by invasive vector mosquitoes	May 2017	11
Uncooked prawn imports: effectiveness of biosecurity controls	December 2017	22
Hitchhiker pest and contaminant biosecurity risk management in Australia	July 2018	9
Military biosecurity risk management in Australia	July 2018	5
Horse importation biosecurity risk management	September 2018	4
Implementation of Interim Inspector-General of Biosecurity recommendations	September 2018	1
Environmental biosecurity risk management in Australia	April 2019	7
Effectiveness of biosecurity measures to manage the risks of brown marmorated stink bugs entering Australia	May 2019	14
Pest and disease interceptions and incursions in Australia	May 2019	5
Effectiveness of approved arrangements in managing biosecurity risks in Australia	July 2019	13
<b>Total</b>		<b>91</b>

Note: [Completed audits and reviews](#) are available on the Inspector-General of Biosecurity website at [www.igb.gov.au](http://www.igb.gov.au)

## Chapter 2

# Review methodology

This review examines departmental progress in implementing recommendations from the first seven IGB reviews, up to April 2019. For each review, I considered by desk audit:

- 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
- 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, and
- how well the overall conclusions of each review had been addressed to date.

## Chapter 3

# Improving handling of IGB review recommendations

In 2018, while reviewing the department's implementation of former Interim Inspector-General of Biosecurity (IIGB) review recommendations, I concluded that improvement was needed in the departmental processes used to track implementation of these recommendations over time. I recommended, and the department agreed, 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 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.

There was good progress with implementing this recommendation by June 2019. The department captured data tracking IIGB and IGB review recommendation implementation into a new software package—the Governance module of Planning Hub—and made progress in assigning responsibility for action(s) on each recommendation against different departmental 'risk owners', and for creating reports on each review rather than each recommendation.

However, risk owners were not all aware of their responsibility to update the new tool. For some reviews, different divisions or branches were responsible for different actions and had no visibility of what others might be doing. This meant that no-one had oversight of overall progress against the intent of a particular review.

### Recommendation 1

For each IGB 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.

A strong and continuing tendency was noted for individual recommendations to be marked as 'closed', when an intent or process to implement them was put forward, rather than when the department provided evidence of implementation to achieve the envisaged outcomes. This reduced the number of 'open' recommendations which required further action or review, but meant that 'closed' recommendations might not be further considered, or that the intent might never become reality.

### **Recommendation 2**

The department should record recommendations as 'completed' rather than 'closed' and only when evidence of actual implementation is provided.

Many actions recommended in various reviews may need to be implemented periodically, or long term, or modified over time. There is no facility in Planning Hub to nominate dates for future review of implementation, which can be of great value particularly when senior staff change and may not understand system improvements which were previously considered necessary. Further evidence of continued implementation over time can address the risk that satisfactory implementation might have lapsed or waned due to pressure of other work or loss of corporate knowledge.

### **Recommendation 3**

The department should add a facility in Planning Hub to nominate dates for future review that implementation of recommendations is (still) occurring or is no longer appropriate. Periodic review should become the rule rather than the exception.



## Chapter 4

# Implementation of specific IGB review recommendations

### 4.1 Invasive vector mosquito review, May 2017

Most of the 11 recommendations in this review were closed by the department through reference to the Department of Health's *Response guide for exotic mosquito detections at Australian first points of entry* which was published in August 2017. This useful document clearly set out the roles and responsibilities of the Department of Agriculture, as well as other departments and stakeholders, in managing exotic mosquito incursion risks. It would be appropriate periodically to review Agriculture's performance against these roles and responsibilities, as well as its ongoing progress in implementing the recommendations of this IGB review, and ensure that this implementation continues to produce desired results that are effectively communicated to stakeholders.

### 4.2 Uncooked prawn imports review, December 2017

Major progress has been made in implementing the 22 recommendations of this review. The review showed a high need for rigorous onshore verification of prawn import declarations and pre-border certification. Extensive pre-border and border measures such as seals-intact inspections and laboratory testing of samples of all incoming prawn consignments have led to a far more compliant trade, and a better understanding by industry and governments in the exporting countries of how to meet Australia's requirements. Importantly, testing of retail prawns in 2018 and again in 2019 showed that the new measures have greatly reduced the risk that imported prawn products might be bringing in disease, with a very low rate of significant detections of white spot syndrome virus found in retail prawns in 2018, and none in 2019.

The biosecurity import risk analysis for prawns which is currently underway will inform further revision of import conditions, which hopefully will preserve the major gains made in managing the biosecurity risks of this pathway since 2017.

### 4.3 Hitchhiker pest and contaminant review, July 2018

Most of the nine recommendations in this review were difficult to progress, due to complexity of the pathways by which the pests and contaminants arrived. Diffuse non-commodity risks, like external contamination of sea containers with biosecurity risk material, are very difficult to push offshore.

The Australian biosecurity system is under too much pressure to permit the levels of external inspection (and subsequent case-by-case cleaning) of individual containers that would be needed to generate reliable information about risky countries or ports of origin. New remote or automated inspection technologies are still in infancy. Improving and implementing international agreements about such issues takes years and meanwhile thousands of soil-encrusted containers are entering Australia every year. New introductions of invasive ants and other serious pests remain an unmitigated risk of this pathway. Automatic washing of containers before they leave the port is an obvious solution to this problem.

However, the department has been so busy in the last two years that resources which would otherwise be deployed on implementing these recommendations or upgrading key software have had to be diverted to managing BMSB or other crisis issues. Consequently the recommendations from this review all need to be kept under active consideration, in concert with recommendations from the IGB BMSB review.

## 4.4 Military biosecurity review, July 2018

This review concluded that the biosecurity risks associated with incoming military forces, equipment and transport were, in general, being very well managed. The five recommendations in the review either have been or are being implemented in close consultation with the Department of Defence. Minor changes to schedules of the Memorandum of Understanding between the departments of Agriculture and Defence will allow more streamlined and comprehensive biosecurity risk management for military forces, transport and bases in Australia.

## 4.5 Horse importation review September, 2018

This review concluded that the department was managing horse importation biosecurity risks well but that some improvements were needed particularly at Sydney airport. The department has commendably moved to implement issues within its control, including increased veterinary staffing in Sydney needed to manage the ongoing volumes of horse imports. However, discussion is still underway with industry and Sydney Airport stakeholders, in regard to the upgrading of this airport's horse receival facilities to first point of entry standards.

## 4.6 Environmental biosecurity, April 2019

Excellent progress has been made in implementing most of the recommendations of this review, especially considering the short period of time since its publication, with the recently appointed Chief Environmental Biosecurity Officer (CEBO) playing a pivotal role in this process. Negotiation of a Memorandum of Understanding between the Agriculture and Environment departments will underpin clarification of how the Australian Government manages its contribution to environmental biosecurity. Better coordination between the department's biosecurity surveillance programs such as the North Australian Quarantine Strategy and state and territory biosecurity surveillance activities will be an ongoing issue requiring better two-way communication.

## Chapter 5

# Conclusion

The solid and ongoing rate of implementation of IGB review recommendations demonstrates that the department has continued its commitment to continuous improvement in biosecurity risk management. Future streamlining of internal processes to track implementation on a whole-of-review basis will support this.

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.

Three reviews (Mosquitoes, Military and Environmental) involved the Department of Agriculture managing specific federal biosecurity responsibilities and challenges on behalf of or jointly with other Australian Government departments (Health, Defence and Environment, respectively). Progress in dealing with issues comprehensively with Health and Defence through the mechanism of memoranda of understanding has been excellent and hopefully will continue under the proposed MoU with Environment.

Recommendations in several IGB reviews about better resourcing of various biosecurity activities, and application of cost-recovered funds to manage the biosecurity system better, were quite correctly identified by the department as being a matter for government. The impact of resourcing on future biosecurity risk management delivery will need to be kept under review and brought to the Government's attention as needed.



**Dr Helen Scott-Orr**  
Inspector-General of Biosecurity  
24 July 2019

## Appendix A

# Agency response



Australian Government  
Department of Agriculture

**SECRETARY**

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Dear Dr <sup>Helen</sup> Scott-Orr

Thank you for your email of 24 July 2019 about your review report, *Implementation of Inspector-General of Biosecurity recommendations*, and the opportunity to provide a response to your findings and recommendations.

The department agrees with the recommendations of the report and I am pleased to advise that work has already commenced to implement responses to the recommendations.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Daryl Quinlivan'.

Daryl Quinlivan

24 July 2019

[www.igb.gov.au](http://www.igb.gov.au)