



Australian Government

Interim Inspector-General of Biosecurity

Implementation of previous Interim Inspector-General of Biosecurity recommendations

June 2015

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Introduction

1. The Interim Inspector-General of Biosecurity (IIGB) 2014-15 work program includes a review to assess the actions taken by the Department of Agriculture (the department) to address recommendations included in previous IIGB audits and reviews.

Background

2. In July 2009, the Australian Government appointed an IIGB to enhance the integrity of Australia's biosecurity systems through the independent evaluation and verification of the performance of these programs across the biosecurity continuum – pre-border, border and post-border. IIGB recommendations generally aim to address risks to the successful delivery of biosecurity programs, services or functions. While the department is not compelled to accept or implement the IIGB recommendations, since 2009, the majority of recommendations (96 per cent) have been agreed or agreed with some qualification.

Review objective

3. The objective of this review was to assess the actions taken by the department to implement recommendations generated by previous IIGB and Interim Inspector-General of Horse Importation (IIGHI) audits and reviews.

Scope

4. The scope was to review and assess the adequacy of actions taken and recorded in the department's internal database (eTRAC), where the department has marked implementation of a recommendation as 'complete'.

5. All recommendations included in completed IIGB reports are recorded in eTRAC, which is used to track and update progress on the department's high-level actions and decisions.

6. As at 29 August 2014, eTRAC contained 95 recommendations marked as 'complete', from 22 published reports.

Methodology

7. The IIGB considered the department's actions, as reported in eTRAC, to implement each of the previous 95 recommendations.

8. Where the IIGB considered the original intent and purpose of the recommendation had been satisfactorily addressed, the IIGB has closed the recommendation for no further action or follow-up. This includes two of the 95 recommendations that were not agreed by the department.

9. In some cases the IIGB considered further information was required or the actions taken did not fully address the intent of the recommendation. In these cases, the IIGB approached the

department for further information or clarification, regarding the actions taken to implement the recommendation.

10. Where the implementation of a recommendation necessitated wider departmental action, for example significant modification or enhancement of an IT system, or the IIGB considered that the nature of the biosecurity risk warranted ongoing monitoring, that item was placed on an observation list of broad themes. It is intended that these themes will be periodically reviewed, every six or twelve months.

Findings

11. The IIGB initially considered implementation of 82 of the 95 recommendations as satisfactory and regarded these recommendations as 'completed' (Attachment A). However, in implementing some other recommendations, it is recognised that the department will require additional time to introduce more wide-ranging changes.

12. In some cases, the IIGB approached the department for updated information on the actions taken to address recommendations. In each of these cases, the IIGB is satisfied with the responses received from the department, and after further review, considers that all 95 recommendations can be regarded as 'completed'.

13. As noted above, the department is not obliged to accept IIGB recommendations. In 2012, the IIGB made two recommendations regarding an annual detailed survey of horses on properties in the vicinity of post-arrival quarantine facilities. These recommendations were not agreed, as implementation was considered impractical and unnecessary; they were also inconsistent with the relevant import risk assessment.

14. Effective implementation of IIGB audit recommendations requires strong management oversight and monitoring, together with clear responsibilities and timely actions. This review has highlighted the benefits of having well-understood reporting processes and timelines for the consideration and implementation of IIGB recommendations.

15. The IIGB has created a list of broad areas (themes) where it is considered that the outcomes of the department's actions should be periodically monitored and assessed. This recognises that full implementation of some changes might be dependent upon parties external to the department, outside the department's control, and require considerable time. It is accepted that at present, the department has implemented such recommendations to the extent of its ability, and accordingly those recommendations are appropriately recorded in eTRAC as 'complete'.

16. The themes on the observation list (Attachment B) will remain 'live', for inclusion in the IIGB's next regular review of recommendations.

17. While all items on the observation list are judged to be relatively low risk at present, the IIGB may decide to initiate a new audit where a situation has significantly changed or new information becomes available.

Conclusion

18. The IIGB considers the department is making good progress in its implementation of IIGB recommendations, demonstrating its ongoing commitment to continual improvement in the management of biosecurity risks.

19. This review has demonstrated the benefits in having clear, agreed processes and timelines for auditing and reporting of all IIGB activities.

Next review cycle

20. The IIGB will commence the next review of previous recommendations in August 2015.



Dr Michael Bond
Interim Inspector-General of Biosecurity
10 July 2015

Attachment A

Recommendations closed by the Interim Inspector-General of Biosecurity

Title		Publicly released
Report of the Interim Inspector-General of Horse Importation – April 2009		28 July 2011
Recommendation		
1	AQIS should re-design the shower-out facilities associated with the horse quarantine compound at Eastern Creek Quarantine Station to completely ensure that clothing and footwear worn in the horse compound is separated from clothing and footwear worn outside that area.	
2	AQIS should consider structural and procedural changes to the access arrangements for staff to the dog and cat quarantine area at Eastern Creek Quarantine Station to remove the need for transit by way of road through the horse quarantine compound.	
3	AQIS should revise manuals of operational procedures for post-arrival quarantine facilities in Australia to ensure they are consistent with a HACCP approach.	
4	AQIS should temporarily suspend the import conditions for the return of Australian horses and the temporary importation of horses from the United Arab Emirates until the impending major re-construction of the racetrack, exercise track and horse walkways is at a stage when these facilities can be assessed for acceptability of separation from non-PEQ horses during exercise periods of PEQ horses.	
5	Biosecurity Australia should conduct a study that will enable objective standards to be defined for the internal surfaces (including flooring) of stables in PEQ facilities for cleaning and disinfection purposes.	
6	AQIS should confirm with all competent authorities who are involved in the preparation for the export of horses to Australia the need for adherence by veterinarians to nasopharyngeal swabbing rather than nasal swabbing in testing undertaken during PEQ.	
7	AQIS should require that any indoor exercise area at a PEQ facility may only be used by horses undergoing PEQ for Australia after inspection by the competent authority has verified that either: a. Absorbent flooring previously used for the exercising of other horses has been replaced; or b. The time since the exercise area was last used by another horse has exceeded minimum requirements to be specified by AQIS.	
8	AQIS should introduce a standard requirement that loading doors of ground transport vehicles carrying horses from the PEQ to the point of export must be sealed to the satisfaction of the relevant competent authority after loading at the PEQ.	
9	AQIS should require that operational manuals of PEQ facilities must include a procedure for the sourcing and validation of information regarding the health status of the premises of origin and the vaccination history of horses in PEQ.	
10	AQIS should finalise as quickly as possible model operational procedures for PEQ facilities to assist competent authorities and PEQ facility operators to move more speedily toward development of HACCP-based manuals of operational procedures.	
11	AQIS should confirm with the relevant competent authority that it is not acceptable for the chain of custody of samples taken for export testing from horses in PEQ for Australia to directly include the manager or operational staff of the PEQ facility.	

12	AQIS should confirm with the relevant competent authority that it is not acceptable for horses in PEQ for Australia to access the sand- floored exercise area that is used by other horses that are undergoing post-arrival quarantine in that country.
13	AQIS should ensure that the Standard Operating Procedures under development for the relevant PEQ must specify that Australian PEQ horses to be walked to the ground transport loading ramp at the end of the quarantine period must not leave the PEQ facility until the following measures are undertaken: <ul style="list-style-type: none"> a. Any horses being accommodated at the barn adjacent to the loading area are stabled; b. External doors of that barn have been closed; and c. Only the loading ramps that are furthest from the barn will be used to load Australian PEQ horses.
14	AQIS should require that the Standard Operating Procedures under development for PEQ facilities that offer racetrack training include a documented procedure for horse-mounted safety officers at racetrack training sessions to maintain separation of at least 100m from Australian horses. In the event that such horses come into closer contact with Australian PEQ horse undertaking trackwork, this must be immediately reported to the official veterinarian and subsequently to AQIS, Canberra, as soon as possible with full details of that incident.

Title		Publicly released
Prawn incident review – an examination of what caused a consignment of imported raw peeled prawns that tested positive for White Spot Syndrome Virus (WSSV) to be mistakenly released into Australia by the Biosecurity Services Group (BSG)		22 November 2010
Recommendation		
1	Placing a requirement on the importer for scrutinising laboratory results and explicitly stating to BSG whether the outcomes are positive or negative. This would require the importer to provide a positive statement regarding the test results which would provide an extra preventative measure to ensure that laboratory results are treated correctly. This should be reinforced with appropriate sanctions for false declarations and by BSG assurance measures. However the requirement for BSG to verify the outcomes of the testing, based on the copy of the report provided directly to them by the laboratory, and then process the release of consignments in AIMS would remain and therefore the risk of mistaken release would ultimately remain.	
3	The consistency of release processes throughout the Region Offices should be reviewed by the Central Office (Operations Division) to assess whether there are other opportunities for improving release processes. This assessment should also consider whether reporting and release functions could be centralised (as suggested by BSG) to the BSG Entry Management National Coordination Centre in Adelaide to provide more dedicated attention to these specific processes.	
4	Implement an additional control which requires that all emailed laboratory test results be reviewed by the supervisor each day and verification that positive test results have been treated correctly in AIMS be performed. This additional control is not considered to result in significant additional workload on the supervisor as, on average, there are only a few laboratory test results released each day.	
5	The accredited laboratories should change the format of reports to make positive test results stand out more clearly from negative test results. The format of the laboratory reports should also be amended to ensure that these contain a definitive statement regarding whether testing has resulted in positive or negative results. This will provide staff with a single point of reference to inform the release of consignments.	

6	Post-inspection officers should ensure that the quarantine entry number and the results of the testing of each of the 13 individual samples of five prawns are acknowledged on the laboratory reports in order to verify that the correct laboratory report is being referred to, and the outcomes of the testing of each sample have been individually reviewed.
7	The 'Prawn Sampling for Disease Testing (updated)' Work Instruction should be amended to more clearly define what exactly constitutes a batch by, for example, providing a single definitive identifier such as the processing run and clarifying all additional defining attributes that should then be evaluated and in order of importance.

Title		Publicly released
Assessment of the Biosecurity Services Group internal audit of Sandown Post-arrival Quarantine Facility		18 May 2011
Recommendation		
1	In future, AQIS audits of operations and procedures that have earlier been audited by a recognised audit provider (for example, the Interim Inspector General of Biosecurity or Interim Inspector General of Horse Importation during 2008–09 or the Australian National Audit Office) should include an assessment of changes made in response to adopted recommendations made in the relevant report.	
2	AQIS should include in the role of operational oversight by the official veterinarian added measures to assure that entry/exit biosecurity requirements are fully met by all personnel for any privately run quarantine facility.	
3	AQIS should withhold approval of Racing Victoria Limited (RVL) to conduct post-arrival quarantine operations at either its Sandown or prospective Werribee facilities pending appropriate corrective actions by RVL to findings in the AQIS audit. This should also entail a detailed follow-up assessment by AQIS of the ability to RVL to meet standards of documentation and training and to fully comply with biosecurity requirements in the future.	

Title		Publicly released
Import Health Certification for Horses Imported to Australia		18 May 2011
Recommendation		
1	In the case of stallion imports, the Biosecurity Services Group should require full import health certification for any test mares maintained in the pre-export quarantine facility during the quarantine period and not intended to be exported.	
2	The Biosecurity Services Group should note and consider the appropriateness of a Licensed Veterinary Inspector issuing certain components of the health certification relating to import conditions as a private veterinary practitioner with no reference to his/her official Department of Environment Food and Rural Affairs status.	
3	Biosecurity Services Group (BSG) should clarify with the United States Department of Agriculture (USDA) the requirement for documentation to be supplied that addresses Condition 13.1 in the USDA Veterinary Health Certificate. It is advisable that this documentation accompany the health certification provided with all future shipments of horses from the United States of America (USA).	

Title		Publicly released
Audit of Equine Pre-export Procedures in Singapore		24 May 2011
Recommendation		
1	BSG/AQIS should clarify with the Agri-Food and Veterinary Authority of Singapore the need for nasopharyngeal swabbing (not nasal swabbing as is practised by the authorised veterinarians) of horses for equine influenza testing.	
2	It is recommended that BSG/AQIS request an attestation by the attending para-veterinarian of the Agri-Food and Veterinary Authority of Singapore responsible for inspection of the aircraft/aircraft fittings associated with the export horses be included as an attachment to the export health certificates. This situation also applies in some other countries that export horses to Australia.	
3	It is recommended that the Interim Inspector General of Biosecurity write to Singapore Turf Club and the Agri-Food and Veterinary Authority (AVA) of Singapore providing an overview of the audit findings and advising that AQIS will advise, and be in contact directly, if any formal action is required in response to this audit.	

Title		Publicly released
Quarantine surveillance following post-arrival quarantine for specified horses after importation to Australia		27 May 2011
Recommendation		
1	It is recommended that a follow-up audit of the quarantine surveillance procedures for imported horses be carried out in South East region during 2010 by the Interim Inspector General of Biosecurity or under other agreed arrangements. The audit should be conducted when the officer responsible for administration and oversight of the database and paper files in the region is available.	
2	It is recommended that the Biosecurity Services Group (BSG) formally require the owner of the horse 'Horse A' to specify the premises where the horse is to be kept and to advise BSG of any relocation of the horse during quarantine surveillance. [Refer to recommendation 9 for conditions to be met on the death of this horse.]	
3	It is recommended that greater attention should be applied to the completion of records of equine quarantine surveillance information in the South East Regional office.	
4	To assist in a nationally coordinated approach in quarantine surveillance recordkeeping, a standard format database should be developed for use by all regions to record all requirements of the relevant work instructions.	
5	To ensure a seamless transition into quarantine surveillance, the Biosecurity Services Group should ensure that any uniquely developed quarantine surveillance requirements are communicated to the appropriate regional office prior to the release of the horse from the post-arrival quarantine station.	
6	To remove a current practical anomaly it is recommended that the Biosecurity Services Group clarify the work instruction regarding responsibility for relevant notification to another region of an impending quarantine surveillance arrangement.	
7	It is recommended that the Biosecurity Services Group clarify the procedures for provision by the horse owner of a horse transport plan from the post-arrival quarantine facility to the approved premises for quarantine surveillance. In particular, this should specify the submission pathway for the importer to provide the transport plan.	

8	It is recommended that the Biosecurity Services Group (BSG) tighten compliance in relation to the provision of a horse transport plan from the post-arrival quarantine facility to the BSG region in which quarantine surveillance is to occur.
9	It is recommended that where a horse is required to remain under quarantine surveillance for life, a detailed disposal plan for the horse's carcass be developed and agreed to between the Biosecurity Services Group, the attending private veterinarian and the owner. The disposal plan is to be kept at the appropriate regional office and should be maintained as a live document until the disposal conditions have been met.
10	It is recommended that the Biosecurity Services Group carry out inspections of the horse 'Horse A' on a set schedule rather than the current ad hoc arrangements.

Title		Publicly released
Management of quarantine waste from international vessels at Australian seaports		22 July 2011
Recommendation		
1	The Biosecurity Services Group should verify by means of official on-site inspection that the operations of approved deep burial facilities include the immediate covering of all unloaded quarantine waste as described in the AQIS Compliance Agreement Process Management System for the Burial of Quarantine Waste.	
2	The Biosecurity Services Group should undertake a technical assessment of the adequacy of current requirements (May 2010) to manage biosecurity risks associated with the deep burial of quarantine waste. In particular, this should address the adequacy of prevention, surveillance and response activities for intrusion of foraging animals (particularly birds) onto a site where deep burial operations occur. Operational procedures, compliance agreements and other relevant documentation should then be updated accordingly.	
3	Quarantine food-waste from international vessels (including sea and aircraft) should be treated, where practicable, by autoclaving or incineration in preference to deep burial. The Biosecurity Services Group should review its procedures for quarantine waste to determine if food waste can be practically isolated from other quarantine waste material collected and transported for treatment.	
4	To ensure contemporary scientific risk management underpins relevant policies and procedures, the Biosecurity Services Group should undertake periodic technical assessment (including on-site examinations) of the risk management procedures that apply to quarantine waste.	

Title		Publicly released
Australian Veterinary Emergency Plan (AUSVETPLAN)		22 July 2011
No recommendations		

Title	Publicly released
Horse pre-export operations and procedures from Japan - desktop review	22 August 2011
No recommendations	

Title	Publicly released
Quarantine operations risk management (pathways) audit – citrus canker	22 August 2011
Recommendation	
3	That DAFF considers undertaking periodic laboratory analysis for pests and diseases on citrus fruit and related items seized through leakage surveys.
4	That DAFF ensures that the implementation of the risk return model, as it relates to passenger screening, is monitored and reviewed.
5	That DAFF gives consideration to how any future changes to communication activities (e.g. corporate branding) for DAFF might impact on the NAQS program.
6	That DAFF considers working with other agencies operating in Australia’s northern region on an appropriate (or amended) information and data sharing protocol.

Title	Publicly released
Importation of nursery stock – offshore operations audit	22 August 2011
Recommendation	
1	That DAFF establish an information gathering and assessment group (or other appropriate mechanism), as recommended in the Beale review, to consolidate the monitoring, gathering and assessment of international plant pest and disease status.
2	That DAFF considers undertaking periodic laboratory identification of any microbial contamination detected on tissue culture during the arrival inspection process to confirm the absence of biosecurity risks.
3	That DAFF reviews the approval process for sources free of media to ensure that it records the physical location of the approved sources facility and identifies the persons responsible for its operational management and ownership and includes relevant conditions of approval.
4	That DAFF, following review of the approval process, finalise and implement the draft work instruction for the approval of sources free of media – Work Instruction for the tissue cultures free of media.
5	That DAFF reviews the documentation that guides quarantine officers and Operational Science Program officers on the processes to follow when disease symptoms are detected at the border on tissue culture plantlets to ensure consistency across all regions.

6	That DAFF implements better communication on Australian import conditions to offshore approved sources.
9	That DAFF implements an audit framework with a forward-looking audit schedule that is supported by appropriate audit tools.
10	That DAFF implements monitoring and feedback arrangements at the border inspection stage to measure the effectiveness of the alternative risk management measures implemented by Taiwan.
11	That DAFF considers the broader application of recommendations 9 and 10, should alternative arrangements be introduced in other countries and/or for other commodities.

Title		Publicly released
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)		18 June 2012
Recommendation		
1	That DAFF considers risk-based intensification of inspection regimes for individual large fertiliser tonnage with particular emphasis on first-time importers.	
2	That DAFF reviews its procedures for follow-up responses involving imported goods that have been released from quarantine to ensure attending field officer(s) complete an adequately detailed report, proportional to the scale of potential biosecurity risk, within a reasonable timeframe.	
3	That DAFF communicates with the relevant state and territory department (for example, agriculture, primary industries) where biosecurity risks have been identified in imported goods that have been previously released and are located in rural areas.	
4	That DAFF arranges a follow-up surveillance visit to the Parkes farm by a weed scientist, plant pathologist and entomologist to confirm that no unusual pest or disease has established since the soil consignment was stored at the farm.	

Title		Publicly released
Desktop review – the approval of offshore pre-export quarantine facilities for importing horses to Australia – December 2012		8 April 2013
No recommendations		

Title		Publicly released
Desktop review – the approval of offshore pre-export quarantine facilities for importing horses to Australia – June 2013		16 December 2013
Recommendation		
1	DAFF should clarify the wording of the Certification at Port of Export, requiring the competent authority's authorised official at the airport/port to attest that the horse(s) have had no contact with equids not of equivalent health status by specifying a linear distance of separation that is in keeping with the standards of the Australian Import Risk Analysis for equines.	

Title		Publicly released
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		17 December 2013
Recommendation		
3	That DAFF put in place a system for gathering and analysing data on seizure and noncompliance of live imported fish consignments to enable timely monitoring of performance of each approved country's competent authority and exporters against Australian import requirements.	
4	The Director of Animal and Plant Quarantine respond as soon as possible to the recommendations of the July 2010 provisional final IRA with respect to biosecurity risk management for iridoviruses.	
5	That DAFF develop a formal training package for fish inspectors. This should include monitoring of the ongoing competency of inspectors.	
6	That DAFF pursue development of legislative requirements that enable fit and proper person considerations in the QAP application and approval process.	

Title		Publicly released
The effectiveness of controls for imported uncooked, cooked and cured pig meat		17 December 2013
Recommendation		
1	DAFF should institute a formal cyclical review process for approved countries to ensure that approved exporting countries have the appropriate systems and procedures in place to meet Australia's import requirements for pig meat.	
3	DAFF should develop a random inspection regime for uncooked pig meat consignments, which has a focus on opening a sample of cartons to confirm uncooked pig meat products received are in line with DAFF biosecurity requirements.	

4	For imported pig meat, DAFF should ensure that the minimum audit regimes for quarantine approved facilities and facilities operating under compliance agreements are adhered to.
Title	
An examination of biosecurity controls associated with the export from Australia of live abalone to China and Hong Kong	
Publicly released	
30 January 2014	
Recommendation	
1	That DAFF, in consultation with relevant Tasmanian stakeholders, develops a paralytic shellfish toxin (PST) risk management process map indicating control and decision points in the abalone harvesting and export processes.
2	That the minister considers communicating with the Tasmanian Abalone Council Ltd to acknowledge and further encourage the abalone industry's continued collaboration with the Tasmanian Shellfish Quality Assurance Program (TSQAP) to develop a PST predictive capability for the implementation of risk management measures for abalone.
4	That DAFF considers undertaking a risk assessment for revision of the Australian Shellfish Quality Assurance Program (ASQAP) Export Standards 2004 to include abalone in the definition of shellfish.

Title	
The importation of untanned animal hides from Colombia in 2012-13	
Publicly released	
24 February 2014	
Recommendation	
1	The department should finalise its review and release to the public (as soon as practicable) the import requirements for hides and skins.
2	New or revised departmental guidelines, standard operating procedures and work instructions should be communicated, published and available to staff in a timely manner.
3	The department should investigate the possibility of retaining and archiving electronic copies of all import documents used in the clearance process, including those presented at the front counter.
4	The department should explore options to ensure that any manufacturers' declarations used in the clearance process are authentic.
7	The Entry Management training program should be enhanced to improve decision-making capabilities; this incident can be used as a case study to demonstrate the lessons learned, especially in relation to inconsistencies in documentation.
9	In any future review of the department's staff mobility policy, a rigorous risk assessment should be undertaken to determine the level of expertise required for the Entry Management Program.
10	The department should develop a specific assessment regime for first-time importers of untanned hides and skins, to ensure that the goods have been processed according to import requirements.

Title		Publicly released
Arrangements for oversight of horse biosecurity risk management		15 May 2014
No recommendations		

Title		Publicly released
Audit of the Werribee Post-Arrival Quarantine Facility (Melbourne, Victoria)		
Recommendation Number	Recommendation	Status
1	DAFF should investigate the Victorian government records for property identification codes listing horses, with a view to establish awareness of and record the presence of non-PAQ horses within 1km of the Werribee PAQ facilities annually.	NOT AGREED BY THE DEPARTMENT
2	It is recommended that a timing mechanism be provided in the shower unit that is not fitted with the electronic tag system so that users can ensure that they meet the three minute showering.	

Title		Publicly released
Audit of the Eastern Creek Animal Quarantine Station (Sydney, New South Wales)		
Recommendation Number	Recommendation	Status
1	DAFF should investigate the Cumberland Livestock Health and Pest Authorities (LHPA) records for property identification codes listing horses, with a view to establish awareness of and record the presence of non-PAQ horses within 1km of the Eastern Creek Quarantine Station annually.	NOT AGREED BY THE DEPARTMENT
2	That DAFF closely monitors the requirement for tick treatment in pre-export quarantine overseas and regularly assesses the availability and use of products that have acaricidal rather than repellent properties	

Biosecurity themes to be kept under review ('observation list')

The following six broad 'themes' cover thirteen recommendations that, while appropriately recorded as 'completed' in eTRAC, may require further actions outside the department's direct control and/or significant additional time for full implementation. The themes also include areas where the department has effectively completed implementation of a recommendation, but the IIGB considers it appropriate to monitor outcomes of particular initiatives.

In some cases, the IIGB might decide to undertake another (new) audit or review, to further assess the effectiveness of the department's actions.

<p>1. Communications interface between AQIS Import Management System (AIMS) and diagnostic laboratories</p>
<p>The development of a system interface between the diagnostic laboratory and AIMS to allow for test results to be directly input into AIMS, is being incorporated in the department's Service Delivery Modernisation (SDM) initiative.</p>
<p>2. Accreditation and review of diagnostic laboratories</p>
<p>The department has been actively involved in the development of relevant diagnostic protocols, through the Subcommittee on Plant Health Diagnostic Standards, and has implemented aspects of a quality management system relevant to international standards.</p>
<p>The department encourages scientific and technical peer review of the quarantine station operational manuals and materials on a regular basis. As part of the transition to the new PEQ facility at Melbourne Airport, instructional material is being reviewed by relevant operational, technical and policy areas. Key documents have been peer reviewed by a third-party assessor, to verify compliance with the ANZ Standards for Microbiological Safety and Containment.</p>
<p>3. Performance of approved authorities in exporting countries</p>
<p>The department has implemented a formal monitoring and review process for approved overseas sources of nursery stock. All approved sources have been asked to reapply, and informed that each facility will be subject to biennial review.</p>
<p>The department provides feedback to National Plant Protection Organisations of the approved source's home country, in the event of a non-compliance incident or issue.</p>
<p>Biosecurity reforms being trialled by the department include a system of monitoring the performance of countries exporting ornamental fish, to check they meet Australia's biosecurity requirements. This system provides evidence-based means of directing resources towards those countries that pose the highest risks, based on surveillance data.</p>
<p>4. Assessment and processing of import/export documents</p>
<p>For imported food inspections, the inspecting officer is being provided with copies of the consignment documents originally submitted by importers/brokers for assessment. This procedure will be progressively streamlined, as the new mobile technology is implemented.</p>
<p>The department has considered the organisational culture of staff with biosecurity-related responsibilities to ascertain any need for clarification of the degrees of emphasis to be placed on regulatory functions and timeliness of import clearance. Revised eLearning and face-to-face training packages emphasise officers' regulatory responsibilities, balanced with the needs of clients.</p>

The department has considered possible modifications to the export documentation system (EXDOC) to allow automated control checks before issuing export certificates for abalone. However this can only be achieved when state authorities develop an abalone management strategy, with defined harvest areas and controls.

The department will continue to move processing and assessment of all import documentation to the back office, away from the front counter, to allow complex entries to be referred to more experienced staff. The implementation of the Cargo Online Management System (COLS) should also facilitate this process.

5. Strategic and operational intelligence capabilities

The department has improved its analytical and predictive functions by expanding its strategic and operational intelligence capabilities, through the development of several operational/strategic intelligence products. These reports aim to provide an integrated picture of the sea cargo threat and current compliance policy.

The department's targeted campaign methodology has been improved, testing compliance of consignments from countries where a significant change in animal disease status has occurred.

6. Electronic lodgement of documents

The department's implementation of the Cargo Online Management System (COLS) should provide further incentives to encourage increased electronic lodgement of entries and accurate declarations.

Acronyms/Abbreviations

AQIS	Department of Agriculture (formerly Australian Quarantine and Inspection Service)
AIMS	AQIS Import Management System
ASQAP	Australian Shellfish Quality Assurance Program
AVA	Agri-Food and Veterinary Authority (Singapore)
Beale review	<i>One Biosecurity – A working partnership</i> (Review of Australia's quarantine and biosecurity arrangements, 2008)
Biosecurity Australia	Department of Agriculture Animal Biosecurity and Plant Biosecurity Divisions
BSG	Department of Agriculture Biosecurity Divisions (formerly Biosecurity Services Group)
COLS	Cargo Online Lodgement System
DAFF	Department of Agriculture (formerly Department of Agriculture, Fisheries and Forestry)
eTRAC	Department of Agriculture database for high-level actions and decisions
EXDOC	Export documentation system
HACCP	Hazard analysis and critical control points
IIGB	Interim Inspector-General of Biosecurity
IIGHI	Interim Inspector-General of Horse Importation
IRA	Import risk analysis
LHPA	Livestock Health and Pest Authority
NATA	National Association of Testing Authorities
NAQS	Northern Australian Quarantine Strategy
NPPO	National Plant Protection Organisation
PEQ	Pre-export quarantine
PST	Paralytic shellfish toxin
QAP	Quarantine Approved Premises
RVL	Racing Victoria Limited
TSQAP	Tasmanian Shellfish Quality Assurance Program
USA	United States of America
USDA	United States Department of Agriculture
WSSV	White spot syndrome virus