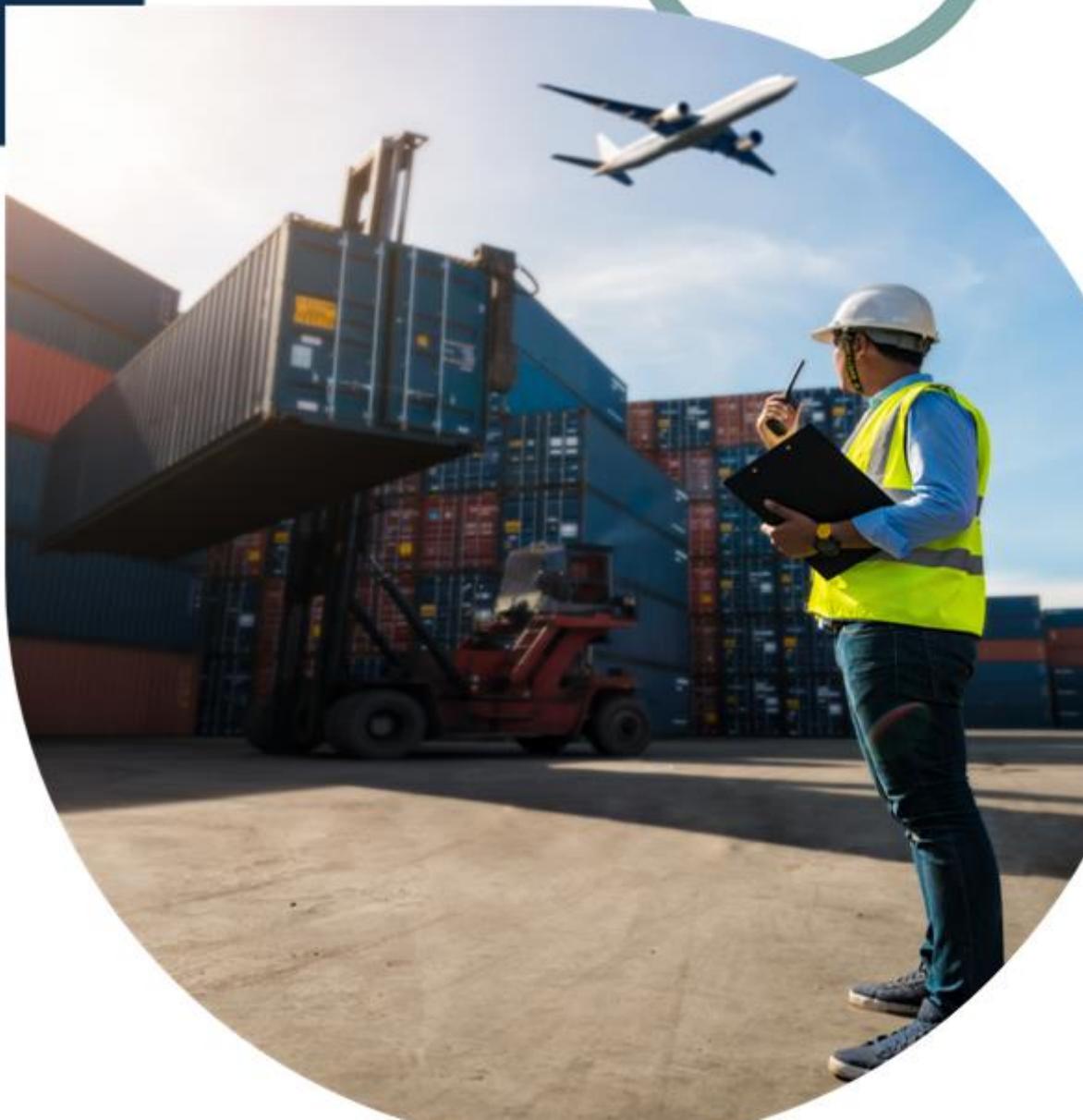




Review Work Plan

Review of documentation requirements for the biosecurity risk assessment of imported goods





Title:	Review of documentation requirements for the biosecurity risk assessment of imported goods
Type of activity:	Systems and processes review
Initiated by:	Inspector-General of Biosecurity

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Rationale

The Inspector-General of Biosecurity (Inspector-General) is responsible for reviewing the Department of Agriculture, Fisheries and Forestry's (the department's) effectiveness in administering biosecurity legislation and standards. This includes assessing the performance of functions, or exercise of powers, by biosecurity officials under one or more provisions in the *Biosecurity Act 2015*.

The use of documentation for the assessment of biosecurity risk in relation to imported goods is a core control element of risk-based biosecurity decision making at the pre-border and border stages. Biosecurity officers use required documents to assess both commodity and non-commodity concerns. Some documentation is required under legislation; other documentation requirements are developed by different policy teams within the department.

Through initial conversations with stakeholders, issues relating to understanding and applying documentation requirements were raised often. When documentation requirements are unclear, duplicative, difficult to interpret or not clearly aligned with current policy settings and operational realities they can create material impacts on both regulated entities and department staff. Ineffective or overly burdensome requirements may contribute to delays in clearance, increased requests for further information, inconsistent assessment outcomes, avoidable compliance costs and higher administrative workload without necessarily improving biosecurity risk management.

No previous Inspector-General review has taken a broad overarching view of the department's documentation requirements in relation to biosecurity risk assessment of imported goods. This area has not been the focus of external audit or review (e.g. ANAO or CEBRA) in recent years.

As an initial review, this topic also provides opportunities to gather information and insights that will be utilised in future topics.

Review Purpose

The purpose of this review is to determine whether the department's documentation requirements for imported goods support high quality biosecurity risk assessment outcomes without creating unnecessary regulatory burden. The review will also assess whether the processes that underpin the development and use of these documentary requirements are appropriate to support effective regulatory practice.

Specifically, the review will examine whether current documentation requirements:

- provide the information necessary for robust and consistent biosecurity risk assessments
- deliver efficiency in their regulatory impact
- offer clarity and practical usability for internal and external stakeholders
- display a clear link between the requirement and the biosecurity risk/s that are managed.

Review Objectives and Scope

The objectives of the review are to:

- assess the efficiency and effectiveness of departmental documentation requirements for the purpose of assessing biosecurity risks relating to imported goods
- evaluate the underpinning processes, governance, and decision-making pathways used to create, update and retire documentation requirements for the assessment of biosecurity risks

- examine how documentation requirements interface with policy settings, regulatory obligations, and operational practice at the pre-border and border stages
- explore and understand the experiences of internal and external stakeholders in interacting with, interpreting, and completing required documentation.

Scope

The review will examine departmental documentation requirements, and the processes supporting their development and application, as they relate to the assessment of biosecurity risks for imported goods (including live animals and biologicals) under the *Biosecurity Act 2015*. It will consider activities at the pre-border and border stages only.

Out of scope

- The elements of the biosecurity system that are within the remit of state and territory governments and industry.
- International trade issues and market access opportunities, including individual decisions made in the relation to the importation of goods.
- Consideration of documentation requirements not connected to imported goods (e.g. documentation requirements relating to human health, conveyances and ballast water).
- Evaluation of post-border biosecurity compliance, surveillance, or enforcement activities.
- Assessment of the department's broader organisational capability or workforce performance.
- Technology system performance, except where directly related to document creation, distribution, or accessibility.
- Documentation requirements relating to imports that are not classed as 'goods' (human health, conveyances and ballast water).

Methodology

The Inspector-General of Biosecurity will adopt a structured, evidence-based approach to review the department's processes and systems relating to the training of Biosecurity officers. This review will take a qualitative research approach, assessing existing processes, systems and data and gathering insights from key stakeholders.

The methodology will be guided by principles of independence and transparency. It will include the following components:

1 Planning and Scoping

An initial entry meeting will be held with departmental executives to confirm the review's objectives and scope. This meeting will also identify potential risks and mitigation strategies and provide an opportunity for all parties to discuss the proposed review process.

2 Information Gathering

The Inspector-General will request relevant information and data from departmental officers, including policies, instructional materials, and communications. Preliminary discussions will clarify data requirements and ensure timely provision of documentation.

3 Stakeholder Engagement

The review will involve consultations with key stakeholders through in-person and online meetings. Consideration will be given to an internal Have your say survey focusing on understanding staff experiences. Stakeholders will be invited to provide written submissions to ensure a broad range of perspectives and evidence are considered.

It is expected that internal fieldwork will be conducted. The Inspector-General and support staff will observe internal stakeholders in the process of their duties to gain a better understanding of the work and issues raised.

External fieldwork will be conducted. This will involve meeting with key external stakeholders (customs brokers, importers, exporters) to understand how the documentation requirements interact with their processes.

Should observations during the review warrant it, the Inspector-General may issue one or more Discussion Papers to elicit further input from internal and external stakeholders and potentially convene roundtables for discussion.

4 Validation of Findings

Preliminary findings will be shared with departmental representatives to confirm factual accuracy and address any misinterpretations. Additional evidence may be requested where necessary to support robust conclusions.

5 Reporting and Recommendations

The Inspector-General will prepare a draft report outlining key findings and recommendations. An exit meeting will be held with departmental executives to provide an overview of initial findings and explain the process for responding to the draft report. The department will be invited to provide a formal management response to the recommendations before the final report is submitted to the Minister for Agriculture, Fisheries and Forestry and published on the Inspector-General's website.

6 Assurance and Transparency

Throughout the review, the Inspector-General will ensure that all processes are conducted in accordance with legislative requirements and best practice standards, maintaining independence and transparency at all stages.

Conflict of interest declaration

The inspector-general and her support staff do not have any personal conflicts of interest to declare in undertaking this review.

Administrative contacts

Inspector-General of Biosecurity contacts

Name	Position
Melissa McEwen	Inspector-General of Biosecurity
Naveen Bhatia	Assistant Director
Sharra Lannan	Senior Research Officer (review lead)
Ciana Crispin	Policy Officer

Stakeholders

The Inspector-General consults widely. Consultations extend to subject matter experts and other stakeholders internal and external to the biosecurity group. Stakeholders include:

Internal

- Policy areas writing documentation requirements for imported goods
- BICON content writers, developing documentation requirements for BICON
- Assessment Officers, implementing documentation requirements at the initial risk assessment

- Inspection Officers, assessing documentation at inspection
- Travellers’ teams, in relation to documentation requirements for goods arriving with travellers at airports and ports.

External

The Inspector-General will reach out to relevant industry and interested stakeholders to gather information and reflections on experiences. For this review, these will include, but are not limited to:

- Freight and Trade Alliance
- International Forwarders & Customs Brokers Association of Australia
- International Cargo Handling Co-ordination Association
- Large importers

Proposed timetable

The *Biosecurity Act 2015* and the Biosecurity Regulation 2016 outline the scope and process for reviews undertaken by the Inspector-General.

Activity	Timing (approx.)
Work plan and background research	February 2026
Entry interview with department	March 2026
Review workplan finalised	March 2026
Initial information/data request	March 2026
Submission process/consultation with staff	March-April 2026
Review of documentation, data analysis, desktop work, field work	March – May 2026
Draft report to department for fact-check	June 2026
Final report to Secretary for formal management response	July 2026
Publish final report on inspector-general’s website	August 2026

See [Appendix B](#)

Review project risks

Description	Impact if unmitigated	Treatment	Mitigated risk level
Difficulty obtaining relevant information from the department as required by legislation	Delay in review finalisation	Introductory meetings between the Inspector-General and the department to clarify the workplan and purpose of the review. The Inspector-General provides an information request to the biosecurity group and engages regularly with nominated contacts to clarify information needs. The Inspector-General exercises power under the <i>Biosecurity Act 2015</i> .	Low
Sensitivity issues limiting timely access to information	Delay in review finalisation		

Description	Impact if unmitigated	Treatment	Mitigated risk level
Unexpected findings relating to numerous or complex issues, or new information necessitating revision of scope or timeline	Delay in review finalisation	The Inspector-General engages regularly with the nominated contacts and senior biosecurity officials regarding review findings and the provision of relevant information as required under the <i>Biosecurity Act 2015</i> .	Low
The department disagrees with draft findings and recommendations	Delay in review finalisation	The Inspector-General engages regularly with nominated contacts and senior biosecurity officials to discuss the status of the review and clarify the evidentiary basis for the findings.	Low
Publication of incorrect information	Reputational damage	The Inspector-General provides a draft of the review to the department for feedback and fact-checking before publication, as set out in the Biosecurity Regulation 2016	Low
Staff movement reducing the number of department staff in the Office of the Inspector-General	Delay in review finalisation	The Inspector-General requests adequate resources from the department (e.g., consultancy, expression of interest) to support the review under the <i>Biosecurity Act 2015</i>	Medium
Changing priorities in the Inspector-General's review program	Delay in review finalisation	The Inspector-General consults with the Director of Biosecurity and Minister regarding any changes impacting the annual work program, including this review. The Inspector-General may request adequate resources from the department (e.g., consultancy, expression of interest) to support completion of this review under the <i>Biosecurity Act 2015</i>	Low

Appendix A

Background (with references)

References for this appendix are listed in the Bibliography following Appendix A.

Australia's natural geographic isolation has spared it from many pests and diseases that have caused significant environmental, economic, and social impacts in other countries. This strong biosecurity position also supports the international reputation of Australian goods, helping producers secure favourable market access and premium prices for export products.

However, Australia's geographic isolation also means that the needs and preferences of the population cannot be met through domestic production alone. Many goods Australians rely on must be imported to meet demand. As a result, significant volumes of goods enter the country by air and sea each year.

Despite recent short-term declines, overall import volumes remain higher than a decade ago (Australia imports, 2026). Import volumes in tariff categories associated with higher biosecurity risks (e.g. SITC Section 0: Food and Live Animals) continue to show steady year-on-year growth (NFDH 2026).

Through the National Biosecurity Strategy and the DAFF Biosecurity 2030 Roadmap, the department sets out its forward priorities for Australia's biosecurity system. These documents provide clear direction for building a system that focuses on the highest-risk threats, and for ensuring resources, intelligence and partnerships are used effectively to protect Australia now and into the future.

As a government agency, the department operates within finite resources. At the same time, biosecurity risks continue to grow and must be managed within stable, and at times decreasing, budgets. A risk-based approach enables the department to prioritise the highest-risk areas and commodities, ensuring resources are directed where they will have the greatest impact.

Inspecting every item at the border is resource-intensive, and studies show that increasing inspection rates alone does not necessarily lead to improved compliance (OECD 2014). Effective workload management relies on applying a consistent, risk-based approach to guide intervention decisions. Documentation plays a critical role in enabling the department to make accurate, risk-based decisions without relying solely on physical inspections.

This system is not without limitations. Changes in policy settings or shifting priorities can result in legacy requirements remaining in place beyond the point at which they are effective. In response to an incident or incursion, new requirements may be introduced quickly, and in the haste to implement them, they can increase regulatory burden without full consideration of alternative options. In some cases, what is ideal from a policy perspective may not be practicable operationally, and without strong shared understanding or effective feedback loops, gaps in clarity and alignment can persist.

In initial discussions with stakeholders, several examples have been raised that illustrate the types of issues being experienced. Stakeholders have also highlighted how unclear or outdated requirements can create unnecessary regulatory burden and operational inefficiencies. In the BICON case for frozen fruit (BICON 2026), documentation requirements include a manufacturer's declaration

containing six statements to verify that the goods have undergone an “appropriate freezing process.” Among these statements is a requirement to include the country of origin. Country of origin, however, does not appear to have any material relevance to the biosecurity risk assessment for frozen fruit.

There have been instances where assessment officers, following BICON strictly, have rejected manufacturer’s declarations that omit this information. This results in importers or brokers needing to obtain updated documentation, incurring additional charges and processing delays. Inconsistencies in decision-making also occur. There is no discernible change in assessment outcomes when country of origin is included, yet some officers accept declarations without this statement while others do not. These issues point to a broader challenge: when requirements are unclear or inconsistently applied, voluntary compliance becomes harder to achieve. Initial engagement suggests these challenges are not isolated to a single pathway or commodity, but reflect broader issues.

Addressing this requires a focus on enabling voluntary compliance, consistent with the guidance in RMG 128, which emphasises the role of regulators in ensuring regulated parties are “informed entities” who understand what is required and why. Research on compliance also shows that intrinsic motivation to comply increases when people understand the rationale behind regulatory requirements (Feldman 2025), for example, when there is science-based evidence demonstrating that a treatment method, when carried out correctly, effectively mitigates a biosecurity risk.

When compliance obligations are clear and easy to meet, regulated parties are more likely to comply voluntarily. This, in turn, allows departmental resources to be focused on areas of greater biosecurity risk and value.

Together, these factors highlight the need to review current documentation requirements to ensure they remain risk-proportionate, operationally feasible and aligned with contemporary regulatory principles. Strengthening clarity, consistency and the evidence base for requirements will support voluntary compliance, reduce unnecessary regulatory burden and enable the department to focus resources where they provide the greatest biosecurity value.

Bibliography for Appendix A

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Feldman Y. 2025, 'What Is Intrinsic Compliance Motivation?' In: [Can the Public Be Trusted?: On the Promise and Perils of Voluntary Compliance](#), accessed 17 February 2026.

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NFDH 2026, [Import and Export Containerised Merchandise Projections | National Freight Data Hub](#), Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts, accessed 19 February 2026.

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Appendix B

High level project timeline

