



Review Work Plan

Management of biosecurity risk across the biosecurity continuum





Title: **Management of biosecurity risk across the biosecurity continuum**

Type of activity: **Systems and processes review**

Initiated by: **Inspector-General of Biosecurity**

Contents

Rationale	2
Review Purpose.....	3
Review Objectives and Scope	3
Scope.....	4
Out of scope.....	4
Methodology.....	5
Conflict of interest declaration	5
Administrative contacts	5
Inspector-General of Biosecurity contacts.....	5
Key Departmental contacts.....	5
Proposed timetable	6
Review project risks	6

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*.

Australia's biosecurity system relies on risk-based decision-making across a range of pre-border, border and post-border activities. Decisions made at one stage of the biosecurity continuum can influence the risks, controls and interventions applied elsewhere. As biosecurity threats continue to increase in volume, complexity and consequence, effective management of these risks increasingly depends on understanding how individual activities operate as part of a broader system rather than as isolated functions.

Previous Inspector-General reviews have examined specific components of the biosecurity system, including import risk analysis processes, operational models, regulatory arrangements and the management of specific biosecurity risks. These reviews have provided valuable insights into individual elements of the system and, in many instances, have highlighted the importance of integration, consistency and coordination across biosecurity functions. Collectively, they provide a foundation from which to consider how risk is managed across the continuum as a whole.

Recent work by the Centre of Excellence for Biosecurity Risk Analysis (CEBRA) has similarly emphasised the importance of viewing biosecurity through a systems lens, recognising that coordinated and effective action relies on an understanding of the relationships and interactions between different parts of the biosecurity system. The biosecurity continuum provides a useful framework for examining these interactions and understanding how risk information, decisions and responsibilities move through the system. (CEBRA *Biosecurity: A systems perspective*, 2024).

The Inspector-General's 2024 review of the management and application of the import risk analysis process found that Australia's import risk analysis methodologies are robust, internationally aligned and generally fit for purpose. However, that review primarily focused on the development and application of risk assessments and did not examine in detail how the outputs of those assessments connect to downstream controls, interventions and assurance mechanisms across the broader continuum. (IGB *Management and application of import risk analysis process* 2024)

Similarly, previous reviews examining risks such as khapra beetle, African swine fever, brown marmorated stink bug and *Xylella fastidiosa* have considered how specific threats are managed, while raising broader questions about capability, coordination and integration across the system. Of particular note, a previous Inspector-General observed that issue-specific investment can result in individual risks being addressed without necessarily strengthening the underlying capability, integration and consistency of the broader system (IGB *Khapra*, 2021). This highlights the value of examining how risk is considered, communicated and managed across different stages of the continuum rather than within individual functions alone.

This review provides an opportunity to examine whether biosecurity risks are managed using a systems-based approach, including how risk assessments, interventions, assurance activities and operational decisions interact across the continuum. In so doing, the review seeks to improve understanding of how the department considers changes in risk through time, how the effectiveness of controls is monitored and verified, the appropriateness of targeting and focus, and how information from different parts of the biosecurity system is used to support risk-based decision-making.

Review Purpose

The purpose of this review is to examine how biosecurity risks are managed across the biosecurity continuum and whether risk-based decisions are being made using a systems-based approach.

For the purposes of this review, 'biosecurity continuum' refers to the connected series of Commonwealth biosecurity activities, decisions and controls operating across pre-border, border and post-border environments within the scope of the Biosecurity Act 2015.

While the broader biosecurity continuum extends beyond the activities examined in this review, incursion preparedness, response and recovery arrangements have been earmarked for a future Inspector-General review and will only be considered where necessary to understand broader risk management across the continuum.

While individual activities within the continuum will be acknowledged, the primary focus of the review will be on the interaction between these stages, including how information, decisions and risk management responsibilities flow across the continuum and contribute to the management of biosecurity risk.

The review will consider how information, decisions and risk management responsibilities move between pre-border, border and post-border activities, and the extent to which decision-makers take account of previous, existing and future controls when determining appropriate risk management responses. Particular attention will be given to how risk is understood, evaluated and treated as it progresses through the continuum, including whether earlier interventions influence subsequent regulatory and operational decisions.

The review will also examine the mechanisms used to govern, monitor, validate and communicate the effectiveness of risk management activities. This includes consideration of whether information gained through assurance activities, interventions, operational outcomes and emerging intelligence is used to reassess risk and inform future decision-making.

A key focus of the review will be understanding how the department accounts for changes in risk over time and across the biosecurity continuum. This includes examining how risk is tracked as goods, pathways and threats move through different stages of the continuum, and whether information generated by interventions, assurance activities, surveillance and operational outcomes is used to reassess risk and test the validity of existing assumptions. The review will consider whether risk settings are routinely adjusted to reflect changes in risk, including where previous interventions have successfully reduced risk, where emerging evidence suggests risk has increased, or where assumptions underpinning earlier decisions may no longer remain valid.

Through this work, the review seeks to better understand how the department maintains situational awareness of biosecurity risk across the continuum and whether existing governance, targeting, feedback and assurance mechanisms support adaptive and effective risk management.

Review Objectives and Scope

The objectives of the review are to:

- examine how biosecurity risk is identified, defined and assessed at different stages of the biosecurity continuum

- map the formal and informal interactions, information flows and decision-making processes between different stages of the biosecurity continuum
- assess whether knowledge management practices support the effective identification, sharing and use of biosecurity risk information across the continuum
- examine how biosecurity risks are managed across the biosecurity continuum and the extent to which risk-based decisions are made using a systems-based approach
- examine how risk is tracked, monitored and reassessed as goods, pathways and threats progress through the continuum
- assess whether assurance, surveillance, operational outcomes and other sources of information are used to validate risk assumptions and inform future decision-making
- examine whether governance, feedback and assurance mechanisms support adaptive and effective management of biosecurity risk across the continuum

Scope

The review will examine how biosecurity risk is managed across the biosecurity continuum, including how risk information, decisions and management responsibilities move between pre-border, border and post-border activities. The review will consider the extent to which risk is monitored, reassessed and communicated as it progresses through the continuum, and how information from interventions, assurance activities and operational outcomes informs subsequent decision-making. As incursion preparedness will be the subject of a future Inspector-General review, this review is not intended to assess emergency preparedness, response or recovery arrangements, except where consideration of these activities is necessary to understand broader risk management processes.

Out of scope

- The elements of the biosecurity system that are primarily the responsibility of state and territory governments, industry participants or international partners, except where relevant to understanding Commonwealth risk management arrangements.
- International trade issues and market access opportunities, including individual decisions relating to the importation of specific goods.
- The scientific validity of individual biosecurity import risk analyses, import conditions or risk assessments, except where required to understand how risk information is used across the biosecurity continuum.
- Assessment of individual operational decisions, interventions or enforcement actions, except where used as case studies or examples to examine broader risk management processes.
- Evaluation of the effectiveness of specific biosecurity controls, treatments or interventions in isolation from the broader risk management framework.
- Assessment of operational performance against service standards, throughput targets or business efficiency metrics.
- Assessment of the department's broader organisational capability, workforce performance or resourcing arrangements, except where these directly affect risk-based decision-making across the continuum.
- Assessment of the technical design, development, implementation, performance or effectiveness of technology systems, data platforms or digital capabilities. These will only be considered where necessary to understand how risk information is collected, stored, shared, communicated or used across the biosecurity continuum.

- Incursion preparedness, response and recovery arrangements. As these matters are intended to be the focus of a future Inspector-General review, they will only be considered where necessary to understand the broader management of risk across the biosecurity continuum.

Methodology

The Inspector-General of Biosecurity will adopt a structured, evidence-based approach. The review will take a qualitative research approach, drawing on departmental documentation, existing data and stakeholder perspectives to examine how biosecurity risk is managed across the biosecurity continuum.

The review will use multiple case studies to examine how specific biosecurity risks have been identified, assessed, communicated, managed and reviewed at different points across the continuum. These case studies will provide a practical basis for examining individual events, pathways, commodities and/or risks, and considering them within the broader governance, operational and system environment in which biosecurity risk is managed.

As an initial phase of the review, the Inspector-General will prepare an interim report focused on the recent red fire ant incursion in Enfield, New South Wales, reflecting the significance of the incident and the public interest in the management of associated biosecurity risks. Using the incursion as a case study, the interim report will examine the management of biosecurity risk at approved arrangement sites, including relevant risk management, surveillance and assurance arrangements. This work will also contribute evidence to the broader review of risk management across the biosecurity continuum.

The subsequent broader review will draw on this work and additional case studies to examine how risk-related information is generated, acted upon, shared and reviewed across relevant areas of the department, including biosecurity risk assessment, operational and compliance functions. Case studies will be selected during review planning and in consultation with the department, with consideration given to their capacity to illustrate broader system challenges, emerging risks or areas of strategic importance.

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
Stephen Figg	Assistant Director
Sharra Lannan	Senior Research Officer (review lead)
Ciana Crispin	Policy Officer

Key Departmental contacts

Given the breadth of activities undertaken across the biosecurity continuum, the review is expected to engage with a range of departmental stakeholders. Relevant areas are anticipated to include those responsible for biosecurity policy, risk assessment, operational delivery, compliance and enforcement, intelligence, data and analytics, scientific and technical advice, and governance functions.

The review team recognises that the most appropriate stakeholders may vary depending on the pathways, commodities and risk areas selected for detailed examination. The department is therefore encouraged to identify representatives from relevant business areas who can provide insights into how biosecurity risk information is generated, shared and used to support decision-making across the continuum.

The Inspector-General appreciates the support of nominated departmental contact officers in coordinating requests for information and facilitating engagement with relevant stakeholders. The Inspector-General and review team may also seek information directly from business areas where this will assist the timely and efficient conduct of the review.

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	August 2026
Entry interview with department	October 2026
Review workplan finalised	October 2026
Initial information/data request	November 2026
Interim Report	
Review of documentation, data analysis, desktop work, field work	Initiating November 2026
Draft report to department for fact-check	February 2027
Final report to Secretary for formal management response	March 2027
Publish final report on Inspector-General's website	April 2027
Main report	
Review of documentation, data analysis, desktop work, field work	TBC
Draft report to department for fact-check	TBC
Final report to Secretary for formal management response	TBC
Publish final report on Inspector-General's website	TBC

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