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Board of Airline  
Representatives  
of Australia Inc

Our Ref.: Let.1956

16 August 2010

Ms Jeanette Radcliffe  
Secretary  
Senate Rural and Regional Affairs and  
Transport References Committee  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Dear Ms Radcliffe

The Board of Airline Representatives of Australia (BARA) welcomes the opportunity to offer a submission to the Inquiry into Biosecurity and Quarantine Arrangements. I apologise for the lateness of BARA's response to your emailed invitation dated 19 July 2010.

BARA represents the interests of international airlines operating to and from Australia. BARA currently has 33 member airlines, including the Qantas and Virgin groups. BARA's member airlines include those providing regular passenger transport (RPT) services as well as specialist freight operators. RPT airlines also carry considerable quantities of freight in aircraft holds. Consequently, BARA's member airlines interact with the Biosecurity Services Group (BSG) on matters related to passenger services, cargo inspection and aircraft waste and disinsection.

In 2008 BARA made a submission to the Quarantine and Biosecurity Review (the Beale Review). That submission set out a number of concerns about Australian Quarantine and Inspection Service procedures. Those concerns related to:

(a) Passenger processing -

BARA's submission highlighted passenger frustration at delays experienced at secondary inwards screening points at Australian airports. It recommended that urgent attention should be given to reducing queuing times. In particular, the BARA submission suggested greater reliance on risk assessment in the quarantine inspection process. BARA is pleased that the Beale Report took up the matter of risk assessment procedures and the BSG has moved away from intervention targets and is now profiling risks.

(b) Disinsection -

To date, BARA's concerns about disinsection requirements have not been addressed effectively since the Nairn Report of 1996 recommended that disinsection of aircraft be discontinued. BARA maintains that the need to continue disinsection should be reviewed at regular and appropriate intervals. Further, research into the use of non-chemical alternatives also should be undertaken.

(c) Pratique -

BARA is pleased that the practice of pratique by exception continues to be the norm, unless an overriding biosecurity threat arises. In its submission to the Beale Review, BARA emphasised that the time immediately prior to landing is the busiest period for both the flight and cabin crews and positive pratique would merely add to crew workloads for little, if any, identifiable biosecurity benefit.

(d) Aircraft provisions and waste -

BARA's member airlines remain concerned that galley and other waste from international aircraft must be treated as quarantine waste, resulting in much higher disposal charges.

(e) Freight processing -

BARA is pleased that there is evidence of fewer inspections of air cargo containers, again reflecting greater reliance on risk analysis. However, BARA would like BSG to give formal agreement to transit and transfer cargo that originates in Australia and is destined for delivery outside Australia not being subject to BSG import requirements.

### **Reform of Australian Quarantine and Inspection Service export fees and charges**

The main concern for BARA's member airlines arising out of the Beale Review related to Recommendation 73, which stated:

“The Commonwealth should increase its Biosecurity investment by an amount in the order of \$260 million per annum, subject to a full costing by departments, to meet the recommendations of this report. A significant part of this increase in resources should be funded through cost recovery and an adjustment to the Passenger Movement Charge.”

The latest information available to BARA shows that in 2008-09 the Passenger Movement Charge (PMC) raised \$502.81 million. This is a very substantial amount of money, collected principally from international airline passengers, for which there is absolutely no transparency. Despite continued attempts by BARA and individual airlines to obtain details of how the PMC collections are distributed between border agencies, no such information has been forthcoming and there has been no detail provided to airlines that demonstrates how the \$47 PMC is determined.

It is BARA's strongly held view that the PMC is an inefficient funding mechanism that, ideally, should be abolished. However, given the existence of the PMC, BARA maintains that, as a minimum, the government, firstly, should clearly articulate that the PMC seeks to recover the costs of government CIQ services only and, secondly, provide the aviation industry with timely annual statements of PMC collections and the costs of services for which funds were collected.

BARA would not oppose, in principle, a greater share of the PMC collections being allocated to BSG, but would be very concerned about any further increase in the quantum of the PMC, especially in the absence of the transparency requirements stipulated above.

### **Adequacy of current biosecurity and quarantine arrangements including resourcing**

It was noted above that there is evidence of greater use of risk analysis in the delivery of biosecurity and quarantine services. The revised practices generally have been consistent with the recommendations of the Beale Review. As a consequence, passenger facilitation rates and freight inspection procedures have improved. BSG also has participated in trials aimed at greater use of technology to improve interdiction without sacrificing processing efficiencies. Administration and resourcing efficiencies appear to have a high priority within BSG.

### **Projected demand and resourcing requirements**

Despite the global financial crisis the number of international passengers passing through Australian airports has continued to grow. Further, growth is expected in the longer term. This growth will impose pressures on the delivery of adequate numbers of BSG inspectors. It also will impose pressures on the infrastructure requirements at airport terminals. Both these factors need to be taken into account in planning for the future delivery of biosecurity and quarantine arrangements. Whilst the question of infrastructure delivery is mostly a matter for airport operators and airlines to resolve, especially with respect to costs, there also needs to be adequate attention given to the BSG funding arrangements necessary to cope with expected growth in international tourism and freight operations. In this regard, BARA refers the Committee to the comments above about the transparency and distribution of PMC collections.

### **Progress in implementing the Beale Review recommendations**

BARA has acknowledged general improvements in passenger facilitation rates and freight inspection procedures as a result of greater acceptance of risk analysis following the Beale Review. However, it is BARA's view that overall progress in implementing the recommendations of the Beale Review has been slower than desirable. Whilst BARA welcomes the arrangements established by the Department to improve communications with stakeholders, the final structure of the reorganised Department is still awaited. The full extent of the communications improvements will only become apparent when that process has been finalised. BARA also notes that progress on drafting the replacement for the Quarantine Act 1908 has been slow.

Please contact the undersigned should you require further information in relation to any of the matters raised above.

Yours sincerely

Warren Bennett  
**Executive Director**