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**Community and Public Sector Union**

Rupert Evans – Deputy Secretary

Committee Secretary  
Senate Standing Committees on Environment and Communications  
PO Box 6100  
Parliament House  
Canberra ACT 2600  
Australia

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Dear Committee Secretary

**Inquiry into Environmental Biosecurity**

The PSU Group of the Community and Public Sector Union (CPSU) represents workers in the Australian Public Service (APS), and is the principal union covering staff in the Department of Agriculture.

The CPSU welcomes the opportunity to provide a submission to this Inquiry. Our submission covers the terms of reference that address Australia's recent biosecurity performance and Australia's state of preparedness for new environmental incursions.

CPSU members working in quarantine have considerable knowledge and experience in quarantine operations and issues regarding biosecurity. Quarantine staff have been working for decades to detect and prevent the incursion of invasive species into Australia. This submission reflects the views of our members working in those areas and has been guided by their experience and expertise.

The CPSU surveyed members in the Department of Agriculture about the matters raised in this inquiry's Terms of Reference. The survey received nearly three hundred responses and has informed this submission.

Members have raised concerns about Australia's recent performance and identified budget cuts, staffing and risk-based intervention as the reasons for concern. Many were also unsure about whether the current priorities for quarantine inspection were the correct ones. Further, there is a clear need to improve communication with frontline staff to address a perception among staff that decisions are made primarily because of budgetary rather than border security reasons.

## 1. Australia's recent performance

Australia's geographic location and strict quarantine regulations means it has a reputation as a disease free provider of agricultural products, and an uncontaminated natural environment. This reputation, however, is under threat.

Two thirds (65.6%) of CPSU members surveyed said that Australia's biosecurity arrangements have become worse or significantly worse over the past decade due to declining standards and increasing risks. Members were asked what changes had caused biosecurity arrangements to decline. The most common responses were budget cuts (90%), the policy of risk-based intervention (79.9%) and staffing numbers (77.7%). Members were concerned that decisions about risk-based intervention have been influenced by budget cuts, creating greater risks to Australia's biosecurity:

*Risk Based Intervention in theory is a good policy but the way it is being implemented is terrible. The risk based decisions are not being based on risk but on resources. For example at the mail and airport, goods and passengers are being released without intervention because we don't have the resources to screen them, even if they hit a risk profile. The commercial profiles are probably better than the non-commercial ones but a lot of the risk assessment is done by the broker and based on paperwork. There is little work to test the pathways that are being risk assessed by brokers.*

*Cost cutting and reducing staff may be necessary for the current climate but just saving money short term may well be costly in the future. Risk Based intervention is fine but needs to be balanced. Longer term issues like Australia's export credibility (and tourism) needs to be kept intact so we need to keep a relatively disease free and clean status.*

*Pressures on staff to perform with fewer numbers and same work load as previously are resulting in low morale and stress.*

One member indicated that the failure to communicate biosecurity risks was a key issue that needed to be addressed:

*One really key thing is to keep communicating that we don't have and can never achieve zero risk. And that quarantine is everyone's responsibility - not just Department of Agriculture. These messages were clearly communicated by the former AQIS, but biosecurity and its messages have been subsumed in the new generic Departments focus on 'farm gate' issues. Biosecurity affects all Australians and is not a farmer only issue.*

## 2. Responses to interceptions and incursions

Members were asked to provide some recent examples of incursions. A range of examples were provided which included:

*While I was working at cargo, we came across a container which had Giant African Snails. We placed salt all around the container to try and contain the snails but that weekend we had monsoonal rain and the salt was just getting washed away. Treatment of the container couldn't be done until Monday (and we found giant African snails on a Friday).*

*Mosquitos found in luggage areas of Perth, Adelaide & Melbourne.*

*Exotic moth found in chestnuts from South Korea at the Melbourne Gateway Facility.*

*Recent incursion of Asian Longicorn Beetle that came in on infested timber pallets that were approved.*

*Repeated interception of exotic bee species, particularly Asian honey bees carrying parasitic mites at sea ports. In one case there appeared to be preferential treatment given to a vessel that berthed in Darwin Harbour while contaminated with a large nest of bees.*

From these examples, it is clear that there are a range of biosecurity risks, not only from cargo in ports but also through our airports.

It is, however, a concern that members report a mixed response to quarantine interceptions. Two fifths (39.1%) were unsure if any changes had occurred to screening following particular interceptions, while a third (33.3%) said no changes had occurred. Less than a third (27.5%) indicated that changes have occurred in response to interceptions:

*There has been increased surveillance and targeting of timber pallets from China.*

*Inspection protocols for commodities have changed in response to interceptions on specific imported goods. Some commodities which have been recognised as low risk are now processed on documentation. Surveillance programs in northern Australia are targeted in response to previous interceptions. Each change needs to be assessed on a case by case basis. Some changes have been effective, others have not.*

Others have said that there have been no changes or that it has been for a limited time:

*Alerts are put out to staff but no changes to profiles or how profiles should be better screened.*

*The processes have not continued and interventions have only been for a short time.*

One member explained that part of the problem was application of policy and there was a need to improve responsiveness:

*Better linkage between application and risk management policy. It is improving but needs more robust feedback mechanism and ability to modify policy as a result including overseas scrutiny of export systems.*

### 3. Australia's state of preparedness

Nearly three quarters (71.3%) of CPSU members said that current biosecurity arrangements were inadequate or really inadequate to prevent the entry and establishment of invasive species. Over half said that Australia was unprepared or very unprepared for an incursion of an invasive species (56.7%).

The most commonly cited weaknesses in the biosecurity system that allowed incursions to occur were inadequate biosecurity procedures and measures on pathways (67.9%) and budget cuts (67.9%), followed by risk-based intervention (55.6%).

Members provided many examples of how budget and staffing cuts are weakening Australia's biosecurity system and increasing risks:

*Detector dog units have been removed from several ports which are the most efficient resource in detecting concealed, prohibited seeds and plant cuttings.*

*We have little to no staff sometimes at the airport. Regular travellers have quickly worked out to not declare and come in at night when there are even less staff.*

*Currently we allow a certain amount of soil to enter Australia on containers if the 1st delivery address is a metro area. The view is that incursions can be contained in a metro area. Fire ant spread proves this view as incorrect. Reduction of intervention priorities at airports may lead to increased risks.*

*Recent staff cuts through VR process and actively recruiting staff to take redundancies across Northern Australia, especially in the Torres Strait Islands has left a great gaping hole in our northern Biosecurity defences. It is only a matter of time before there will be another incursion into Australia through this route.*

*Due to the staff cuts, very little quarantine risk is found; many high risk items are simply not detected.*

*Everyone is doing two jobs. I was originally in a team of 17, lucky if we now have 6 or 7. Only have two teams per night. People are overworked, end up sick.*

It is particularly concerning that members report that funding to biosecurity intelligence is being cut:

*Funding to strategic biosecurity intelligence is being cut. Developing a national framework for organizing biosecurity intelligence has now been abandoned. Australia will continue to rely on conventional (time and resource consuming) intelligence gathering.*

It is of little surprise that less than one in ten CPSU members (7.0%) believed that current systems for response were adequate. The most common reason given for the inadequacy was staffing levels (45.2%). Particular concerns were raised about the impact of staffing on the Department's contingency planning. Members indicated that the Department is unprepared and that staff cuts mean that sites are frequently understaffed and would not be prepared for an emergency.

*In the event of an emergency I think we, as a federal agency, are woefully unprepared.*

*It's a disgrace there will be an outbreak of something soon.*

*At our airport site we are frequently on 'contingency' because of incredibly low staff numbers, which allows high risk passengers to pass through without intervention.*

*Contingency planning at the moment is heavily reliant on state bodies for any incursion of pests. If the experience I had dealing with an outbreak of stem rot on rice is an indication (3 years ago), as a department we are woefully under prepared.*

*Airport constantly is in contingency due to low staff numbers as a result of the budget and as a result we would have no idea of how much high risk is being leaked due to lack of intervention.*

*Staffing numbers are not sufficient to respond to a sudden incursion.*

*Currently on the plant health and environmental pest front planning and response appears to be haphazard to almost non existent.*

*More resources need to be provided to plan for high priority risks. Governments – states and federal – are cutting funding for biosecurity responses.*

#### 4. The right priorities?

Members were asked if they had any comments on the process for determining priorities for import risk analyses. Common concerns were that priorities needed to be scientifically based and determined with input from frontline staff, rather than input from industry:

*Import risk analysis need to based on sound unbiased scientific evidence.*

*In theory it's a valid approach but in actuality political or short term economic considerations often take priority.*

*Must be strictly scientific based with absolutely no influence from industry.*

*Risk Analysis completed in Canberra with no input by operational staff.*

These concerns about priorities relate to issues around compliance, reporting, transparency and communication about decision making. These are addressed in turn below. Comments from members also highlight the need for regular two-way communication between operational and policy staff.

#### *Compliance*

Members expressed a view that there needs to be greater effort communicating with frontline quarantine employees about priorities and why they have been chosen. It is concerning that two fifths (41.4%) said they were unsure whether compliance monitoring and enforcement activities were focused on the correct identified high priority risks.

Members were asked what should be priority. A range of different responses were provided, illustrating that greater consultation is needed. One member raised particular concerns about how inconsistencies are affecting compliance, leaving decisions up for interpretation:

*There are inconsistencies in different work areas for what is permitted and what an 'acceptable risk is. These Inconsistencies and contradictions in ICON database leave many commodities open for interpretation.*

#### *Reporting*

Two fifths of CPSU members were unsure whether reporting on incursions was adequate (43.7%). Of the third (37.9%) who thought it was inadequate, the most common reason was the time consuming nature of the reporting system.

*Cumbersome reporting system discourages staff from reporting many small incidents.*

*Because once an incursion is discovered and appropriate action has been taken on that case, nothing else is heard of again.*

*Because there is so much of it (paperwork) that no-one actually does one! It is too time consuming.*

*Time consuming - Feedback received is redundant. Morale is down due to constant change and huge reduction in screening processes.*

*By the time something is reported and it passes through several layers of management, much time has elapsed. Then an advisory panel needs to be set up. Then a committee needs to deliberate. Then a proposed action is drafted. Then action can be taken but only by certain people if there is funding. This could be several months after the incursion was first reported.*

Another common reason provided for inadequate reporting of incursions was linked to communication failures between staff at different agencies and problems between different reporting systems. This often led to a failure to take further action.

*None of the different reporting systems talk to one another or use standardised procedures or data collection parameters.*

*Not all interceptions are fully recorded, systems inadequate to combine data from different sources.*

*There is poor communication between agencies and interested parties. No follow up reporting or enhanced risk mitigation strategies adopted or reported to staff.*

*No communication between field staff dealing with incursions and management making decisions.*

One member concluded that *“fundamental improvements must be made in results recording of information in the field. Gathering and storing information that is used should be more uniform and consistent. Current practices and data are unreliable.”*

Clearly more needs to be done to improve reporting systems to ensure that information is transferred accurately between systems and where possible, reporting processes are simplified.

### *Transparency*

Over half (51.0%) of CPSU members believed that there was no transparency in departmental decision making relating to environment biosecurity. This may explain the high levels of members saying that they were unsure about priorities. Some of the concerns about transparency in decision-making were a breakdown in lines of communication and a failure to explain decisions:

*“Risk based intervention” is used to justify most policies. It is really convenience based intervention e.g. Asian gypsy moth inspections on ships reduced while problem grows.*

*Most of the time staff receive information via gossip and rumour first, not from management.*

*No adequate reasoning is given in the decisions made. Detector dogs were removed from the airport on pm shift for one reason alone, namely budget. Biosecurity risks are present at all times of the day.*

*The Department does not properly explain decisions. All we get is that the ICON listing has been changed with very little reasons behind the decision.*

*In my section, Canberra staff come up with ideas of how to monitor/process possible risks, implement, then when it gets to us it is not workable because they have not had any communication with the people that have to achieve what they have laid out.*

*Nil communication, decisions made without explanation contrary to the practical findings in the field.*

*Many decisions are made without consultation and withheld from staff until the last minute.*

As noted previously, many members also expressed concern that decisions about biosecurity did not appear to be based on scientific evidence but rather on budgetary pressures. It was their view that decisions influenced by budgetary pressures combined with a policy of risk-based intervention would create a significant biosecurity risk:

*At the moment a major priority is cost versus risk return. All measured in dollars but the more you spend on biosecurity protection, the lower the number of incursions. When there are no incursions a Government can question the money being spent. When there is an incursion, money is poured back into the department to boost capabilities. The idea behind Quarantine is prevention. It is costly to run a biosecurity department, but it is more costly to run a response to an outbreak and often eradication is not possible, so it becomes an ongoing management and public education cost, as well as cost to the industry and the immeasurable loss of biodiversity/environmental protection. Much of what we do is in the interest of national (and international) biosecurity, biodiversity and environmental protection.*

*Concerns are made at Commonwealth level based on budget constraints, without people making the decisions observing our working environments.*

*The reasoning seems to be based on budget concerns rather than actual risk. It was very convenient that we discovered that we were looking at far too many things at the exact same time we found out we didn't have enough money to continue looking at all the things we previously looked at.*

*The real reasons many biosecurity decisions are made by management is not clear. This increases the chance that Australia will be subject to the introductions of unwanted pests and diseases and undermines trust of biosecurity officers and the public.*

*The introduction of Risk-based intervention was initially supported by staff as the way forward, however due to budget cuts and staffing levels we are not able to implement the way forward minimising quarantine risk. Management are only concerned about the budget and passenger facilitation.*

## 5. New Biosecurity Bill

CPSU members were asked about the likely impact of the proposed new Biosecurity legislation on arrangements to prevent invasive species. The Biosecurity Bill was proposed by the previous Government but was not passed. The current Minister has indicated the Government's intention to progress with the Bill to replace the Quarantine Act.<sup>1</sup>

Many CPSU members indicated that they did not know much about the proposed legislation to replace the Quarantine Act. This indicates that more needs to be done to raise awareness about the proposed changes. Those who were able to provide comments noted better compliance powers but raised significant concerns about increases in biosecurity risk

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<sup>1</sup> Rex Pannell, Historic Biosecurity Bill 2014 to safeguard Australia, *EnviroInfo*, 9 July 2014, <http://www.enviroinfo.com.au/historic-biosecurity-bill-2014-to-safeguard-australia>, (last accessed 11 August 2014)

resulting from giving industry a greater role in assessing biosecurity risk and reporting incursions. Comments included:

*It is more likely to increase the chances of an invasive species arriving here.*

*It will open the gates. The new legislation is about facilitating industry and not about biosecurity. The emphasis is all about keeping industry happy so they get their consignments cleared quickly and not about assessing the risk in the correct manner.*

*The new Act should make improvements, because it gives better compliance powers and better ability to perform surveillance but there is a risk that biosecurity jobs could be outsourced which would create the risk of industry policing themselves, therefore increasing biosecurity risk.*

*The Act moves to industry based monitoring and reporting. Letting industry decide when to inform us of an interception and this will be based on time equalling money.*

*The responsibility will be put more into the hands of industry, who will take short cuts to keep costs down at the expense of the country's biosecurity integrity.*

*The new legislation is much more modern than the present Quarantine act of 1908. Hopefully it gives "biosecurity officers" better powers to enforce compliance relating to importation of goods which may be contaminated with invasive species/pests/diseases.*

*We need to keep the current legislation and work procedures and enforce the regulations. It is all too easy to introduce exotic pests and diseases and all too hard and costly to eradicate if at all possible.*

The CPSU does note that industry representatives have expressed concerns about the risk of incursion and have indicated strong support and respect for the role that staff at the Department of Agriculture play in guaranteeing Australia's biosecurity.

## 6. Improving the biosecurity system

It is clear from the response of CPSU members that budget cuts are placing pressure on the biosecurity system's ability to prevent the entry and establishment of invasive species likely to harm Australia's natural environment. Cuts have increased workloads, led to changes in protocols to allow more goods into country without inspection, resulted in the removal of dog detection units, and resulted in understaffing at airports.

CPSU members noted that more funding, increased staff to manage the existing workload and better training is needed to address these problems, and ensure the adequacy of Australia's biosecurity system:

*Need more staff more funding/resources to get the job done right.*

*Have more specific skilled staff, have very knowledgeable staff in certain skills rather than a jack of all trades and just knowing a little bit of a variety of things.*

*Have dogs working nights, have more staff in high passenger peak times, inspect all high risk flights.*

*Broaden risk management targets. Increase number of front line officers. Increase intervention rates and targets. Increase powers of Quarantine Officers. Greater funding is needed.*

*More surveillance conducted at airports and seaports is required. Due to risk based intervention only a certain percentage of people and cargo can be intercepted. Under increased quarantine intervention, the rate of people and cargo screened and 'checked' resulted in a much clearer picture of what pests/diseases were consistently being found, and an accurate profile of countries where these were coming from. Now we rely on less information to base these decisions on, and we leave ourselves more open to incursions.*

*Better training for biosecurity officers. Help them understand the risk assessment process. Better support for biosecurity officers. Stop overriding the biosecurity officers' decisions. It makes them more likely to release in future based on past experience. What we need is better communication between the policy makers and those at the front line, increased compliance activities and penalties, increased surveillance activities in areas that we are not currently targeting and to stop outsourcing biosecurity work.*

The Department must seek to improve systems that record incursions and make the reporting process easier. Improved communication with frontline staff is necessary and would help to restore confidence in decision-making. Finally, if it is serious about stopping incursions of damaging and invasive species, the Government must address CPSU members' concerns that budgetary decisions are unduly influencing the policy of risk-based intervention.

If the Committee requires further information from the CPSU in relation to the matters raised in this submission please contact Dr Kristin van Barneveld, Director of Research

Yours sincerely,

Rupert Evans

Deputy Secretary  
CPSU (PSU Group)