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14th January, 2020.

TO: **Parliamentary Joint Committee on Law Enforcement
PO Box 6100
Parliament House
Canberra ACT 2600**

FROM: **Mick Goodwin
Chief Executive Officer
Dog Force Australia**

RE: **Inquiry into an Australian Standard for the training and use of
privately contracted security and detection dogs.**

The Chairperson
Parliamentary Joint Committee on Law Enforcement

Thank you for the invitation to provide this written submission to the _Inquiry into an Australian
Standard for the training and use of privately contracted security and detection dogs._

Introduction.

By way of introduction, my name is Mick Goodwin, I am Chief Executive Officer of Dog Force
Australia (DFA).

DFA is Australia's leading provider of Security and Detection Dog (Explosive, Narcotic and
Conservation) services to government and private sector organisations. Prior to starting the
company in 2014, I retired as the Superintendent - Commander in Charge of the NSW Police
Dog Unit after 29` years service, the last eight of which was dedicated to a number of Command
roles throughout NSW.

Dog Force Australia is a Registered Training Organisation with the Australian Skills Quality
Authority (ASQA). Among our clients include the Australian Federal Police, Royal Papua New
Guinea Constabulary, Northern Territory Police, Australian Army and the Royal Brunei Gurkha
Reserve K9 Unit.

DFA is also the leading provider of Explosive Detection Dog clearance (EDD) services within Australia. Our current clients include most major entertainment and sporting venues throughout Australia.

Background.

Unlike Australia, privately contracted detection dogs are widely used in jurisdictions such as the UK, Europe and USA to provide end users with a reliable service where K9 Law Enforcement Agency resources can't meet demand of private requests for detection dog services. The success of privately contracted detection dog services in these international jurisdictions is reliant on the fact that they have all developed and adopted _National Standards_ for use and deployment of security and detection dogs by private contractors.

In Australia there is currently **NO** Standard for the use of Security and Detection Dogs. Despite this, both security and detection dogs are increasingly being contracted by end users to meet the rising demand for EDD clearances at entertainment and sporting venues, passenger terminals and ports, and to assist in the detection of biosecurity and conservation risks.

Private contractors are regularly providing both security and detection dog services to the private sector and government clients using dogs and handlers that have **NO** documented competency based training or accreditation other than that deemed appropriate by the individual contractor providing the service.

Following the Manchester bombing, Explosive Detection Dog venue clearance requests from international sporting and entertainment promoters has increased dramatically. While some Australian state jurisdictions have the canine law enforcement resources to accommodate these types of requests - other state jurisdictions with limited resources do not. Where law enforcement resources are not available in a particular jurisdiction - there is an increased reliance on privately contracted security and detection dog services to fill the void.

As an example of the increasing demand from private sector end users, Dog Force Australia has, and will deliver the following in support of major entertainment and sporting events;

2018:   36 deployments
2019:   53 deployments
2020:   18 deployments (booked to 31/3/20)

It is now a standard risk management strategy for touring sporting and entertainment events to request explosive detection dog venue clearances as these services are readily available in the UK, Europe, USA and other parts of the world.

Further, with current and proposed changes to regulations relating to air freight screening, there is an emerging need for both cost effective and time efficient improvements to service this industry.

Current Position.

When considering examples of international best practice in countries such as the UK, USA and Europe - competency based standards have been successfully developed through industry and stakeholder consultation. Privately contracted security and detection dogs are now widely used in these international jurisdictions because end users and government regulators can rely on the dogs and handlers having met robust competency based training and accreditation standards.

Dog Force Australia recently made application _Standards Australia_ to develop an _Australian Standard for Security and Detection Dogs_. _Standards Australia_ is Australia's most forthright

organisation responsible for facilitating the development of Australian Standards for industry. We received advice on 7th January 2020 that our proposal has been approved by Standards Australia for development of the following;

- New Standard for *Private Security Patrol Dogs*
- New Standard for *Private Security Explosive Detection Dogs*
- New Standard for *Private Bio-Security Dogs*
- New Standard for *Initial And Continuation Training*

Our primary aim is to bring Australia into parity with international best practice so that the security industry might be able to play a responsible role in future risk management strategies - either to service the current demand of the private sector - or to support under resourced law enforcement agencies as is the case in international jurisdictions.

Specific Points to be Addressed:

> (a) **the adequacy of current Australian arrangements, and the potential benefits of introducing a National Standard;**

This specific point has largely been addressed in the information above.

However, while the recent approval by Standards Australia for the development of the _Australian Standard for Security and Detection Dogs_ is a positive step forward, it would be my submission that the project will greatly benefit through the continued involvement of the *Parliamentary Joint Committee on Law Enforcement.*

Any proposed standard would greatly benefit from the involvement of federal and state law enforcement agencies all of whom have shown little to no interest in participating in the process thus far. This lack of involvement has significantly impeded the progress of the project which was initially commenced in 2016.

A recurring point of contention among law enforcement agencies relates to how any proposed standard may apply to their individual organisation – as each individual organisation has their own internally developed accreditation models which directly relate to the duties performed.

A second recurring point of contention among law enforcement agencies is how any proposed standard may apply to the use of privately deployed narcotic detection dogs.

It should be clearly understood by all stakeholders involved in the development of the proposed standards that the application of the standards specifically relates to privately deployed detection dogs and will have no relevance or application whatsoever to law enforcement agencies. Further, there is, nor ever was, an intention to include narcotics detection within the proposed standards.

It would be my submission that this parliamentary inquiry and any subsequent involvement of the Parliamentary Joint Committee on Law Enforcement would greatly assist in the facilitation of law enforcement agency involvement in this process.

It should be noted that the success of similar projects in other international jurisdictions has been directly related to the involvement of law enforcement agencies in the project development. Where law enforcement agencies are involved in the process, it stands to reason that the finished product will be more readily accepted by both governments and end users. More importantly, law enforcement agencies may be willing to consider following the lead of their international counterparts and introduce properly accredited private detection dogs and handlers to support their operations.

There is no doubt that law enforcement agencies, in particular the Australian Federal Police, would have many valuable issues worthy of inclusion, consideration and discussion in the project development. Such contributions would prove an invaluable resource in producing a comprehensive standard worthy of wider stakeholder and end user acceptance.

(b) funding, administration, and enforcement implications of the introduction of a National Standard;

It would be my submission that the issues of funding, administration and enforcement implications of the introduction of a National Standard would be comprehensively discussed and adequately addressed by the Standards Australia Technical Committee during the project development.

However, as a suggested point of commencement, I am aware that options for administering an independent certification and administrative process may be available through the Security Industry Regulators Forum (SIRF).

As an example of a model which could be followed is that which currently applies to the issuing of a Firearms Licence. Suitably qualified and accredited individuals or organisations would perform the accreditation process on a "fee for service – cost recovery" basis.

There are a number of examples where specialist skills are assessed by qualified organisations and the regulation of such accreditation is achieved through compliance with an Australian Standard eg. The Australian Security Industry Association Limited (ASIAL) certification program for monitoring centres which operates in accordance with *AS2201.2-2004 Intruder Alarm Systems Monitoring Centres*.

(c) the nature and effectiveness of models adopted in overseas jurisdictions;

The nature and effectiveness of models adopted in overseas jurisdictions is evident in how privately deployed detection dogs are accepted by governments, regulators and law enforcement agencies as a bone fide and reliable resource to be deployed in support of public safety operations. This general acceptance in overseas jurisdictions by stakeholders is due specifically to the existence of sound competency and accreditation standards against which both dogs and handlers can be measured.

The following are examples of models in use by international jurisdictions;

United Kingdom

In the UK, two standards have been developed by The British Standards Institution (BSI) which are widely accepted by the government, law enforcement agencies, security industry and end users. The standards were developed through industry stakeholder consultation including input from British law enforcement agencies.

1. BS 8517-2:2016: **Security dogs. Code of practice for the use of detection dogs**
2. BS 8517-1:2016: **Security dogs. Code of practice for the use of general purpose security dogs**

1. **BS 8517-2:2016: Security dogs. Code of practice for the use of detection dogs**

What is this standard about?

A detection or sniffer dog uses its senses (usually the sense of smell) to detect substances such as explosives, illegal drugs, wildlife scat or blood. This standard exists to help ensure that the operational use of such dogs is appropriate.

Who is this standard for?

- Security dog training and handling services
- Security dog services providers and services procurers
- Private security companies deploying such services
- Individual handlers
- Local authorities
- The police and the Ministry of Defence

This standard gives recommendations for the operational use of a detection dog by a detection dog handler when providing passive and proactive detection services, e.g. drugs, firearms, munitions and explosives.

Also many end-users don't understand the full range of services that can be provided, so the standard includes recommendations for procuring security dog services to ensure the service fits the end-user's requirements and risk profile.

1. **BS 8517-1:2016: Security dogs. Code of practice for the use of general purpose security dogs**

What is this standard about?

Security dogs must be safe among members of the public as well as able to defend their handlers if the need arises. This standard exists to help ensure that such dogs are fully trained and are healthy, humanely disciplined animals working under the control of suitably trained handlers.

Trained security dogs are used in the following situations:

- Mobile patrols and alarm response units
- Security guarding
- Searches at airports and ports (for perimeter security)
- Escort duties (following arrest)
- Special events
- Crowd management
- Tracking and detaining offenders
- Property evictions
- VIP protection

Who is this standard for?

- Security dog training and handling services
- Security dog services providers and services procurers
- Private security companies deploying such services
- Individual handlers

- Local authorities
- The police and the Ministry of Defence

This standard gives recommendations for the operational use of a dog by a security dog handler when providing manned guarding services on a static site or mobile patrol. It covers all the relevant issues including records, kennelling/husbandry, dog health and welfare, equipment and clothing, training and operational requirements. The standard also includes recommendations for procuring security dog services to ensure the service fits the end-user's requirements and risk profile.

<u>France</u>

France use detection dogs in two capacities, ***Free Running Explosive Detection Dogs (FREDDs***) and ***Remote Explosive Scent Tracing (REST)***

Both FREDDs and REST are extensively used in France and other European countries to screen air cargo for explosives.

1. Free Running Detection Dogs (FREDDs)

FREDDs are Explosive Detection Dogs deployed in a conventional method whereby they search air freight by physically "sniffing" the freight as it is being loaded.

Currently FREDDs are approved by the USA's Transport Security Administration (TSA) as a primary screening method for international air freight in the following countries;

AUSTRIA	BELGIUM
BULGARIA	CROATIA
CZECH REPLUBLIC	DENMARK
ESTONIA	FINLAND
FRANCE	GERMANY
GREECE	HUNGARY
IRELAND	ITALY
LATVIA	LITHUANIA
LUXEMBOURG	MALTA
THE NETHERLANDS	POLAND
PORTUGAL	ROMANIA
SLOVAKIA	SLOVENIA
SPAIN	SWEDEN
SWITZERLAND	UNITED KINGDOM

2. Remote Explosive Scent Tracing (REST)

REST methodology involves manually extracting by vacuum an air sample from a confined container (ie shipping container) whereby that air sample is captured by a filter. The filter is then presented to an Explosive Detection Dog which will indicate the presence of an explosive odor within the container from the filter.

Currently REST is approved by the USA's Transport Security Administration (TSA) as a primary screening method for international air freight in the following countries;

FRANCE
THE NETHERLANDS

REST is an extremely time and cost efficient way to screen large quantities of air freight, Air France has a permanent REST installation at Paris International Airport which has the ability to screen a fully loaded shipping container for the presence of explosives in **8 minutes.**

The standards used by French authorities to regulate the use of detection dogs in the airline industry is the;

<u>Ministerial and Inter-Ministerial Orders Applicable in the Field of Civil Aviation Security;</u>

APPENDIX12 H: Explosive Detector Dogs Working According To The **Free Running Method** – Standards applicable to the deployment method and;

APPENDIX 12 I: Explosive Detector Dogs Working According To The **Remote Detection Method Of Explosive Odours** – Standards applicable to the deployment method.

United States

In an effort to combat efficiency issues the USA Transport Security Administrations (TSA) created the Certified Cargo Screening Program (CCSP) to look into new ways to screen palletised cargo and regular cargo with less pressure on costs and labour. The solution was to introduce and implement canine and handler teams. The first program created was the <u>National Explosive Detection Canine Team Program (NEDCTP)</u>. After implementation, the CCSP saw issues involving costs and production of canine and handler teams. Third-party companies were not brought in because of a lack of a system to regulate whether each canine and handler team had proper explosive training as mandated by TSA. Eventually, the NEDCTP realised it needed third-party teams. The <u>Third-Party Canine-Cargo (3PK9 or 3PK9-C) Program</u> was the responding program created in 2018 to bridge the gap between the public and private sectors. Regulations and certifications were created to train K9 teams and eventually the program was renamed the <u>Certified Cargo Screening Facility-K9 (CCSF-K9)</u>.

With 320 sensory receptors in their noses, canines present the unique ability to dissect an aroma down to parts per million (ppt). With this ability, they can distinguish between many types of smells, and in turn explosives with efficiency and reliability that no human or machine has been able to provide to the program. Along with their biological sensory, canines also have a database of smells which has been created over thousands of years of evolution, and grows with each new smell a canine processes. Many of these smells are ones that humans do not know exist as they cannot smell it themselves. The relationship between <u>canines and humans give the CCSP a cost and time efficient way of identifying explosive threats</u> within cargo before it enters our air. The K9 program has been growing quickly since its start in 2018 and performance testing has shown results that canine screening is 97% faster and more efficient than the technology currently in use within <u>Certified Cargo Screening Facilities</u>. As this program grows, so will the deterrence, protection, and response.

(d) ***any issues arising in the context of the work of law enforcement agencies, including the Australian Federal Police, in relation to the training and use of privately contracted security and detection dogs, or insights from law enforcement that might help guide the development of an appropriate National Standard.***

As raised earlier in this submission, this project has been under consideration since 2016. The first proposal was unfortunately derailed for a number of reasons, one of which was a lack of support from law enforcement agencies.

Dog Force Australia were required to reapply to Standards Australia in 2019 to have the project reconsidered. We have been successful in this application as advised on 7/1/2020.

Now that the project has secured the approval of Standards Australia to move to the development stage with the installation of a Technical Committee, we sincerely hope through the involvement of the *Parliamentary Joint Committee on Law Enforcement* that the involvement of both federal and state law enforcement agencies will be encouraged to ensure the eventual standard will be an example of international best practice.

(e) any related matters.

Potential introduction of Explosive Detection Dogs (EDDs) for screening Australian air freight.

In early 2019 the USA TSA introduced new regulations a requiring 100% of air freight transported into the USA must be screened for explosives. These regulations were also adopted by the Australian Department of Home Affairs (DOHA) and made applicable to ALL international air freight leaving Australia.

Due to advancements in the use of Explosive Detection Dogs (EDDs), countries such as those listed above were able to deploy EDDs as a primary screening method for air freight. Unfortunately the only option available to Australian freight companies was the installation of expensive and less reliable X-Ray equipment.

Again. these countries were able to confidently and reliably use EDDs to screen air freight as they all have sound competency standards in place against which both dogs and handlers must ensure annual compliance and accreditation.

In June 2020, Australian regulations relating to 100% screening of air freight will be extended to include Domestic Air Freight. The expected increase in freight screening to include all domestic air freight will increase dramatically with industry stakeholders already expressing grave concerns on the ability of existing X-Ray technology to cope with the additional demand.

With the above in mind, Dog Force Australia is currently collaborating with TOLL Group and the Department of Home Affairs (DOHA) to examine the possible use of EDDs to screen air freight. It is likely that a trial will take place at a TOLL Group facility in early February. Pending the success of the trial, TOLL Group are considering introducing EDD screening throughout their Australian operations.

In lieu of an Australian Standard, Dog Force Australia will be utilising our previous knowledge of accreditation standards employed by the NSW Police Dog Unit combined with those outlined in both the British and French Standards.

Introduction of Conservation Detection Dog Policy – NSW Office of Environment & Heritage.

In early 2018 Dog Force Australia was contracted by the NSW Office of Environment & Heritage to undertake a review of the organisation's policy and procedures relating to the use of Conservation Detection Dogs.

Over the ensuing 12 months, DFA conducted a thorough analysis of the NSW OEH policies and procedures which resulted in the drafting of the "NSW Office of Environment & Heritage – Draft Conservation Dog Policy". In essence, this document created a policy by which all matters relating to conservation detection dogs were managed by the organisation, including standards by which both dogs and handlers would be trained, maintained and accredited.

It is envisaged that this document will be formally ratified and introduced as policy by the NSW Government in the near future.

During the review it was ascertained that one certain individual organisation was advertising that for a set fee they could provide an "Australian Certification/Accreditation" for a detection dog and handler. In the absence of an approved Australian Standard, it can only be assumed that this company developed their "own" standard but more concerningly, are purporting to offer individuals (and their dogs) a national accreditation – when no such accreditation exists.

Conclusion.

At present Australia is a long way behind our international partners in target hardening our community from the threat of terrorism. Our proposal is entirely motivated by nothing other than to ensure Australia can replicate the industry standards that has been achieved by international jurisdictions.

What is imperative in this process is that the end product is a robust document that will be of national benefit to end users and regulators. To achieve this we need to bring together as much experience and as many ideas as possible so that the end product can harness the support and confidence of both stakeholders and the wider community.

Sincerely

Mick Goodwin
Chief Executive Officer
Dog Force Group Pty Ltd