

Review of Australia's Quarantine Function

Background

The Joint Committee of Public Accounts and Audit of the Commonwealth Government undertook to review Australia's Quarantine function in 2001 but deferred this review until after the Federal Election, held on 10 November 2001. A letter to NFF in early April 2002 advised of a resumption of the review and invited a written submission from NFF. The following are NFF's comments on the importance of Australia's Quarantine functions in preserving Australia's freedom from the major plant and animal diseases of worldwide importance in agriculture. These comments address technical issues showing the importance of this function of government in protecting Australia's freedom from the major exotic animal diseases. Any one of a number of these diseases would have a large impact on animal production and on our trading position for live animals and animal products. There would be an immediate downgrading of our current "clean/green" image in the rest of the world.

1. Critical importance of our quarantine services in preventing disease incursions into Australia

1.1 *General comments*

There is no question that our quarantine services today form the **primary** protection against the importation of diseases of all livestock. As an island nation, we are in a privileged position in being able to protect our borders, but only through stringent controls on all importations of animals, animal products and preventing the threat of mechanical transfer of disease-causing agents through the movements of persons and materials into Australia at airports and ports. The cautious approach Australia has adopted in the past has served us well and, where scientifically justified, must be maintained if we are to protect ourselves in the future. Notwithstanding increased pressures to free up world trade, Australia still needs to maintain its freedom from diseases like Foot and Mouth Disease (FMD) and Bovine Spongiform Encephalopathy (BSE) to have unrestricted access to world markets for live animals and animal products. Our stringent, conservative quarantine laws have protected us in the past and the recently announced measures by the Commonwealth Government to strengthen our quarantine barriers are to be applauded. Without effective quarantine, Australia is vulnerable to diseases like FMD and BSE and a number of diseases of a range of animals that will adversely affect animal production within Australia and on our internationally recognised disease-free status.

Today we are able to transport animals, animal products and people from anywhere in the world into Australia within 24-48 hours. This time period provides no barrier to the transport of infected animals, contaminated animal products (including food) or the inadvertent mechanical transfer of live, infectious bacteria or viruses on people, or their clothing and footwear. For this reason, it is critical that Australia maintains an

effective, admittedly severe, quarantine regime to protect against the introduction of diseases of animals and plants.

The recent experience in 2001 in the UK highlights the importance of quarantine and the maintenance of effective barriers to the entry of diseases of extreme economic importance. An alleged failure of quarantine measures resulted in the introduction of the FMD virus through illegal imports of meat that were then fed to pigs in northern England. Before the detection of the infection in these pigs, the virus had been able to spread to cattle and sheep in the area and then dispersed throughout England by large-scale stock movements. Inevitably, cost-cutting measures adopted by successive governments in the UK over the past 2 decades, combined with the fact that no emergency plan had been developed nor reviewed since the 1967 FMD spread, resulted in an outbreak of unprecedented proportions, even in world terms. This single outbreak of disease cost the agricultural industries, rural services, the community at large and the UK government vastly more than was saved by reducing functions critical in both preventing and then dealing with the disease outbreak. This lesson should not be forgotten in Australia, including the provision of adequate quarantine services by government agencies for the national good.

While the graphic footage of animal slaughter and funeral pyres in the UK cemented the devastation of FMD in our minds, it is important that we do not lower our guard in respect to other exotic pests and diseases. Screw-worm Fly for example would cause tremendous devastation to all animal industries and even have a potential impact on humans. It is vital that our quarantine systems do not become single minded and focussed on FMD at the expense of other exotic pests and diseases.

1.2 Quarantine services essential to keeping diseases out of Australia

Quarantine services extend well beyond simple inspections at ports/airports, although these functions do play an important and essential role in our protection. Allied with inspections are the provision of adequate technical inputs necessary in carrying out a range of functions now required by international conventions in relation to trade in animals and animal products. It is no longer viable for Australia to have a 'no-risk' quarantine policy given the requirements agreed through the World Trade Organisation (WTO). Essentially, Australia must provide sound, scientific reasons for refusing entry into this country, including valid risk analyses. This does not preclude Australia from adopting a cautious approach by developing 'appropriate levels of protection', or ALOPS, that can be justified on the basis of the damage any introduction of certain diseases would have on our production systems, or serious downgrading of our trading position. It is therefore justifiable to other countries to adopt a very cautious approach, indeed, to all aspects related to preventing the risk of introduction of FMD given our freedom from this disease for the past 130 years. Similarly, where there is a concomitant danger to human health, as well as trade-related issues, we are right to adopt a high ALOP for diseases like BSE.

Maintenance of technical expertise within Australia's quarantine services can easily be seen as essential when it is realised that adequate risk-analyses must be provided to allay industry concerns while still meeting overseas requirements in terms of scientific justification. Allied with the development of these import risk analyses is a need for comprehensive monitoring of overseas scientific

developments in disease detection methods, new and emerging diseases (for example, the emergence of BSE as a human health risk as late as 1996) and general changes in scientific knowledge on a range of disease organisms. Scientific advances also help identify risks not recognised in the past, leading to measures to reduce these risks to a manageable level. Technically competent, trained personnel operating within the Australian Quarantine framework are necessary to carry out all of these essential services.

1.3 Quarantine services provided to facilitate overseas trade

In addition to the vital role of protecting Australian agricultural industries from disease incursions is the essential function of certifying the exports of live animals and all animal products exported from Australia. Certification of exports from Australia must be undertaken on a government-to-government basis according to international rules stipulated by the OIE and WTO. Staff in the export certification area must have the same levels of expertise as those required by staff in the import area. Both functions are therefore justified within our Commonwealth Quarantine Services structure. An intimate knowledge of the animal health status in Australia, scientific advances in relation to disease organisms and up-to-date knowledge of the status of overseas countries is required in both the import and export areas. Both arms work in conjunction within AFFA and should be maintained as synergistic functions.

2. Technical issues concerned with the terms of reference of the enquiry into quarantine services

The introductory comments to the review, made by the Chairman, Mr Bob Charles MP, correctly point out that a major breach of our quarantine barrier would have serious impacts on the economy of Australia as a whole. In June this year the Productivity Commission released a Research Report on the 'Impact of a Foot and Mouth Disease Outbreak in Australia', which found that a major outbreak could cost Australia over \$9 billion in lost export earnings over an 8 year period and reduce Australia's GDP by between \$8 billion and \$13 billion.

It is for this reason that NFF has a special interest in all aspects of Australia's border security and shares, for example, government concerns about deficiencies identified in examining mail entering Australia and variations in the levels of detection of materials at different airports. The allocation in the May 2001 Budget of an additional \$593 million over 5 years to strengthen the quarantine service will help address these concerns, with the aim of ensuring all cargo and mail entering Australia through international airports, seaports and mail centres will be inspected for risk material. The review correctly states, however, that audits must be performed to ensure that these additional funds are spent wisely and achieve the Government's objectives.

2.1 Specific Terms of Reference

- Co-ordination of AQIS with other border control agencies

The close working relationships with other agencies such as Customs (ports and airports) and Australia Post (mail) are obviously important. It is essential

that there is coordination in explaining the importance of quarantine to these agencies and in arranging mutually agreed outcomes in terms of working relationships. There is a need for AQIS to work in closely with other technical groups with an interest in scientific advances to ensure a complete knowledge of the risks posed by certain imports and ways of detecting and dealing with these imports.

- Identification of potential risks to Australia and the application of resources to meet those risks

As outlined in the general comments, AQIS must employ technically trained, competent people to monitor risks posed by imported materials, including modern testing regimes to minimise such risks where imports are allowed. This will involve staff keeping abreast of scientific developments that are occurring within Australia and in overseas countries. Close working relationships are required between AQIS personnel in Canberra and scientists working in Australian institutes and in other agencies like State Departments and Animal Health Australia. Resources are essential to ensure that skilled personnel are available to undertake scientific functions that are a necessary part of modern quarantine operations.

- Impact of international agreements on quarantine activities

Agreements reached through both OIE and WTO will have an obvious impact on quarantine measures adopted in Australia. Australia must maintain its high level representation in both organisations to ensure that there is no relaxation of current agreements, which require that quarantine measures be based on sound scientific principles only. Australia should defend its sovereign right to maintain appropriate levels of protection where diseases have not occurred in Australia, or have been eradicated in the past. Where there are bilateral agreements between Australia and overseas countries for both imports and exports these should be scientifically based and not compromise our plant and animal health status. Bilateral free trade agreements (FTA) must not be allowed to compromise scientifically-based quarantine requirements negotiated in the WTO, no matter how desirable an FTA may be for freeing up trade in sectors outside the agricultural sphere.

- Operations of AQIS that are beyond Australia's borders

AQIS must maintain strong links with outside organisations, both scientific and trade-related, to ensure correct risk analysis procedures are in place for the importation of animals and animal products, plants and plant products and aquaculture. Liaison with overseas countries is also often required in relation to disputes arising from exports from Australia where there is a discrepancy identified between the results of testing carried out in Australia and in the importing country. Flexibility to undertake these important functions needs to be retained.

As Australia's northern borders are a recognised high-risk entry point it is important that adequate resources are provided for the Northern Australia

Quarantine Strategy (NAQS). The allocation of NAQS funds should be focussed on quarantine protection services within northern Australia itself. For example, there is need for increased monitoring of imports through our northern ports and airports. Allied with this is a need for increased air surveillance in northern Australia to detect possible incursions by fishing boats and illegal landings that carry quarantine risks. Aid to our near neighbours in the north in helping with disease surveillance and testing is better carried out through overseas projects, such as those currently undertaken through ACIAR.

- AQIS border operations

This is clearly the most important primary defence against the incursion of exotic diseases into Australia and therefore of critical importance in the functioning of our quarantine services. The inadvertent or intentional importation of prohibited materials containing disease agents and their introduction into large, susceptible populations of unprotected animals in Australia would have catastrophic effects. As previously stated, this is the most likely scenario for the devastating outbreak of FMD that occurred in the UK in 2001. For this reason, increased surveillance to include all imports through ports and airports, together with monitoring all mail entering Australia, is an essential function of AQIS. Increased security in northern Australia is required to bring this up to a level equivalent to that carried out in major centres like Brisbane, Sydney and Melbourne.

- Monitoring and surveillance within Australia for breaches of the quarantine barrier

This is one function that is not appropriate for AQIS to undertake if it involves inspections and testing of animals after they are released from quarantine. The Commonwealth Government does not have a field veterinary service, this function being fully that of individual States and Territories. These jurisdictions do carry out functions for, and on behalf of, Commonwealth agencies (principally AQIS) and they are the appropriate authorities to do so since they operate all of the field veterinary services in Australia. Where continued monitoring of animals may be required, as is the case for animals imported from the UK prior to the 1988 ban because of BSE risks, States and Territories undertake these activities under contract to the Commonwealth Government (or Animal Health Australia). It would be a waste of resources for AQIS to attempt to duplicate field veterinary services, with a concomitant duplication in the administration this would entail. However, NFF does support current efforts by the Federal Government to increase commercial veterinary resources in rural Australia. NFF does not support random testing by AQIS personnel for diseases that we know on clinical grounds do not occur in Australia. Surveys (for instance for FMD) are not required by either the OIE or our overseas trading partners in maintaining our FMD-free status for trading purposes. Indeed, such surveys could well be counterproductive since random testing of negative populations inevitably leads to false positive results, possibly compromising our status until yet more testing is carried out to confirm continuing freedom from the actual disease.

- Development of import risk analyses

This is another critical area for the Commonwealth, which is conducted by Biosecurity Australia in the Department of Agriculture, Forestry and Fisheries. This function involves an assessment of the risks of importing animals and animal products and plants and plant products from countries around the world with very different disease status from Australia. We must always have a well-developed system in place for the evaluation of new protocols for imports, with stakeholder inputs in the import risk analysis (IRA) process. The system developed by AQIS over the past 12-18 months is now more transparent and has a far better developed scientific review process in place than was originally the case. However, it is worth noting that there is a tendency for AQIS to use 'in-house experts' for the development of some IRAs where access to outside expertise would be an advantage. In the case of more scientifically-complex issues, like the importation into Australia of uncooked chicken and pork, utilisation of more overseas expertise, as previously suggested by NFF, would be a decided advantage. It is vital however that Biosecurity Australia remain the sole provider of import risk analyses, though there needs to be a process in place to ensure that these analyses are conducted without unnecessary time delays. It is sometimes apparent that the longer it takes to complete an IRA, the greater the likelihood that political action will be taken by the potential beneficiaries.

- Opportunities to increase public awareness of, and involvement in, quarantine issues

There has been a commendable effort by AQIS to increase the education of the public about necessary quarantine restrictions on travellers and imports following the UK FMD outbreak. Literature given to the public leaving and entering Australia has been informative and designed to point out the necessity for checks at airports and ports of all incoming passengers, baggage and imported materials. This effort needs to be maintained so that the general public, and importers, do not lose sight of the importance of quarantine measures to Australia as a whole. The development of education and awareness programs in schools is a commendable initiative and should continue and be adapted to suit particular regions (particularly rural versus metropolitan).

However, involvement of the general public in the preparation of IRAs is not justified. There are extremely complex issues involved that require either scientific expertise or practical experience as a stakeholder in the industry affected. In relation to the importation of animals from overseas, or the export of live animals from Australia to overseas destinations, involvement of public discussions would be an open invitation to animal welfare lobby groups seeking public support for total bans, or at best, "trading with animal welfare friendly countries". This would be counterproductive to the science-based process and not be in Australia's national interest.

Conclusion

NFF commends the Federal Government for its commitment to Australia's quarantine services, particularly through the funding injection provided in the 2001 Budget. However it is essential to the agriculture industry, and Australia itself as a consequence, that future Governments continue this commitment and do not allow Australia's quarantine services to be compromised for lack of funding. Naturally there must also be systems in place to ensure that these services operate in a cost-effective manner, however quarantine must remain a priority for Australia if we wish to retain our enviable position as a "clean and green" trading nation.