

QEAC

QUARANTINE & EXPORTS ADVISORY COUNCIL

The Executive Officer
Equine Influenza Inquiry
PO Box 72
Queen Victoria Building
SYDNEY NSW 1230

Dear Executive Officer

Inquiry into Equine Influenza Outbreak

I wish to submit the Quarantine and Exports Advisory Council (QEAC) submission in response to the Terms of the Inquiry and the issues and exposure recommendations identified by the Counsel Assisting on 3 March 2008.

QEAC is a non-statutory independent advisory Council to the Minister for Agriculture, Fisheries and Forestry and the Director of Quarantine. QEAC's role is to provide strategic direction and advice to the Minister and the Director of Quarantine on major quarantine and export issues affecting the Australian Quarantine and Inspection Service (AQIS) and the portfolio, and to act as a focal point to ensure broad ranging, effective consultation between AQIS, industry and stakeholders.

The membership of QEAC consists of a Chair, three ex-officio members, the Director of Quarantine, Executive Director of AQIS and the Chief Executive of Biosecurity Australia, and ten other members appointed on a skills and expertise basis.

I have enclosed a copy of the QEAC submission.

This submission has been prepared independently of and does not reflect the views of any of the *ex-officio* (Departmental Officer) Council members.

Yours sincerely



John Crosby
Chairman
QEAC

31 March 2008

QEAC**QUARANTINE & EXPORTS ADVISORY COUNCIL**

QEAC RESPONSE TO EI FINDINGS

The Quarantine and Exports Advisory Council is composed of independent people chosen for their expertise in quarantine, industry and biosecurity. As well, QEAC includes in its membership, the Director of Quarantine, the Executive Director of AQIS and the Chief Executive of Biosecurity Australia. Please note that this submission represents the views of the non-executive members of the Quarantine and Export Advisory Council.

The Quarantine and Exports Advisory Council (QEAC) notes the "Issues of Relevance" identified by the Inquiry and the Exposure Recommendations on which submissions are invited. Also we note the submissions by the Counsel Assisting the EI Inquiry

QEAC would support recommendations made in the light of the Inquiry's findings where those findings identify shortcomings in the risk assessment, import protocol and administrative practices of AQIS/BA in relation to the importation of horses into Australia. The final shape of any such recommendations, no doubt, will have to have regard to the final findings of the Inquiry on Issues 1, 2, 3, 5, 6, 8, 9 and 10.

QEAC notes that significant changes have been made to the import protocols since this disease outbreak which will impact favourably on any future potential EI introduction.

It appears from the evidence that Eastern Creek Quarantine station has failed to comply with known and documented biosecurity procedures required to deal with a virulent disease threat such as EI. This appears to be substantially due to a failure to communicate appropriate procedures and reference points to new staff as they have arrived.

The fact that Spotswood was exposed to the same risk, but was able to manage the situation, points to the importance of the experience of the senior people at Spotswood and their following of known procedures. Also they did not have to deal with the exception of an unfortunately highly susceptible horse in the general consignment.

QEAC also notes that both AQIS veterinarians and the commercial veterinarians associated with the horses both at Eastern Creek and in the countries of origin have failed to implement and enforce biosecurity procedures that any practicing veterinarian should know and observe rigorously. Further,

these professionals failed to instruct their more junior employees of the importance of these procedures.

AQIS must take responsibility for its shortcomings. But the quarantine system used in Australia includes the concept of shared responsibility. The private veterinarians who supervised the horses both overseas and in Australia are treated as partners in the process. The importing brokers are very experienced at their roles and are in a position to witness and influence the entire chain of risks that occur.

If any one of the following steps had been carried out, whether by Government regulation or by good veterinary practice, then it is likely that the outbreak would not have occurred:

- Vaccination with the proper spectrum of EI Vaccine
- Satisfactory procedures to avoid cross contamination during PEQ
- Satisfactory implementation of procedures at Eastern Creek for visitors who needed to enter the quarantine area and exclusion of people who did not need to be there.

QEAC expects that both the AQIS and commercial procedures will be substantially improved in their implementation in order to properly deal with the risks involved.

There are, however, four issues and some associated exposure recommendations where the Council has concerns.

Inspector General of Horse Importation

The Australian horse industry makes a significant contribution to national economic and social well being. But there are many other industries that make an equivalent or greater contribution to the economy. The following table shows the Gross Value of Production of a number of key Australian industries.

Gross Value of Production 2007-08 - Selected Industries¹

	\$m
Cattle and Calves	7 722
Sheep and Lambs incl Wool	4 679
Poultry incl Eggs	1 826
Milk	4 091
Seafood	2 222
Grains and Oilseeds	8 829
Grapes incl Wine	1 336
Fruit and Nuts	2 700
Vegetables	2 920

¹ Source: ABARE

Given Australia's beneficial animal and plant health status, it is equally the case that the livelihood of these industries could be significantly impacted by the incursion of exotic pests and diseases as the Australian Horse industry has been in relation to the outbreak of Equine Influenza. AQIS administers quarantine programs and specific import protocols that support the health status of each of these industries.

Of greater importance are the programs and protocols that are administered by AQIS that protect human health. These include the Imported Foods Inspection Program, the Northern Australia Quarantine Strategy and the importation of cats and dogs. These activities target the protection of Australian society from a number of potentially serious public health issues, including food poisoning, rabies, Japanese encephalitis, highly pathogenic avian influenza, Bovine Spongiform Encephalitis and Nipah virus.

The exposure recommendation for the establishment of an office of Inspector General of Horse Importations (IG) raises serious concerns for the Council. It is our view that an equally compelling case for such an office can, and will, be made by a large number of industries each with very specific pest and/or disease concerns. In many instances the case for such an office, for example for each of the public health concerns and many of the production industries, would be a stronger case on economic and social grounds than that able to be argued for the Australian Horse industries.

The logical extension of the IG concept ultimately would, in the Council's view, lead to unduly narrow specialisation and fragmentation of skilled resources within AFFA. It has the potential to make the management structure more complex, when viewed across all of the animals and plants that AQIS deals with.

At the heart of the draft recommendations appears to be a concern by the Inquiry that there be a strengthened audit focus over the implementation and ongoing management of import protocols. The Council agrees with this strengthening of the audit process, but considers that the means by which this might best be achieved should be a matter for consideration by the Government having regard not only to the Inquiry's findings but also to the broader review of the Quarantine and Biosecurity Review Panel.

Government Quarantine Veterinarian for Horse Importation

The Council has the same concerns as expressed above in relation to the Exposure Recommendation to establish a new Section under the management of the Government Quarantine Veterinarian for Horse Importation (GVH), reporting direct to the Executive Director of AQIS.

The Council notes that the recommendation arises from concerns that:

“[The so called system of matrix management (in an absolute form) is over-elaborate and has resulted in an absence of responsibility and accountability for and compliance with procedures concerning the importation of horses. A simplified hierarchical structure for equine importation is required].”

The Council does not agree that matrix management systems per se, or indeed the system that operates in AQIS, is “over-elaborate” or unduly complex. Council members have experience in the operation of matrix management systems in the Commonwealth Government, State Governments and the private sector. They can and usually do work well to serve the objectives of the organisation, just as the service delivery responsibilities of AQIS have served the industries and community well over the years. The Council understands that there are many critical areas of Government responsibility where the service delivery arrangements operate under matrix management models. This includes the Australian Taxation Office, Centrelink, the Australian Customs Service and the visa and citizenship functions of the Department of Immigration and Citizenship.

The Council notes that at the heart of the draft recommendations in relation to the GVH are concerns that the responsibilities, and accountabilities, of AQIS staff at the National and Regional Offices are either not well documented, not understood or not followed. The Council would support recommendations that addressed these concerns without the potentially significant consequences of the GVH concept being extended to other aspects of AQIS activities.

Any broadening of the GVH concept would lead to:

- Multiple direct reports to the Executive Director
- Centralisation of authority in Canberra
- Specialisation and fragmentation of skilled resources
- Lack of responsiveness to local needs
- Loss of the benefits of multi skilling and transferability of staff

At Eastern Creek, for example, the staff logically would be assigned to a Section headed by the equivalent of a GVH variously responsible for

- Horses
- Cats
- Dogs
- Plant pests
- Plant diseases

Quarantine stations should be designed around the means of transmission of the disease first, and procedures designed to eliminate transference of disease outside the quarantine area. This function is more disease specific than species specific.

AQIS/BA Organisation Structure

The Council notes that Section 4 of the "Issues of Relevance" addresses "Analysis of the organisational structure and its impact upon ...". The Council agrees that the relationship between BA and AQIS and the current structural arrangements are important matters that require further consideration. The Council also notes that the Quarantine and Biosecurity Review Panel released an Issues Paper on 14 March 2008. It flags questions about the current structural separation of BA, AQIS and the Product Integrity Animal and Plant Health Division.

In Council's view these high level structural matters should be dealt with by the Government in light of the Inquiry's findings in relation to Equine Influenza as well as the report of the Review Panel.

The Continuum of Quarantine

The Council is concerned that the exposure drafts focus extensively on the Border elements of the Quarantine continuum as they relate to imported horses and to a lesser extent on the pre-border stage. There is no reference to the Post-border stage.

Risk communication is a critically important issue in Australia. From time to time in the past, public debate has tended to focus on "failure" of the Quarantine system when exotic pests and diseases have been discovered in Australia. There tends to be an assumption that every conceivable threat to Australia's production systems will be identified and stopped at the border. There is not, and there cannot be in future, an impenetrable barrier put in place. There will always be an element of risk associated with anything or anyone that comes into Australia. Our Quarantine system is no different in this regard from the border activities of the Customs Service which cannot detect all movements of illegal substances and items across the border. There will always be a need for effective post-border detection systems and, where possible, eradication strategies.

The post-border systems in relation to EI have, on the whole, appeared to have worked well. The virus was identified, confinement strategies adopted and eradication commenced. This approach has also served Australia well in the past, for example, with the incursion of Papaya Fruit Fly into North Queensland.

The Council would ask that the Report acknowledge the realities of the complexity of Australia's quarantine system and the balanced approach to it that is required across the continuum.