



Department of  
AGRICULTURE  
FISHERIES &  
FORESTRY -  
AUSTRALIA



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## ANIMAL BIOSECURITY POLICY MEMORANDUM 2001/26 PLANT BIOSECURITY POLICY MEMORANDUM 2001/21

### REVIEW OF THE IMPORT RISK ANALYSIS PROCESS

This Animal/Plant Biosecurity Policy Memorandum (ABPM/PBPM) provides stakeholders with an opportunity to comment on a further revised framework for import risk analysis which incorporates the views of stakeholders. Comments by 15 November would be appreciated. The memorandum also provides details on the development of technical guidelines for conducting import risk analysis.

The review of the import risk analysis (IRA) process commenced through a policy memorandum in November 2000 which sought stakeholder feedback on the current process. An April 2001 memorandum advised stakeholders of the outcomes of the March meeting of the Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) relating to IRAs, and sought stakeholder comment on a proposed revised process.

Fifty-five submissions have now been received and eight meetings held with stakeholders.

The principle issues raised by stakeholders were:

- approximately 20% were satisfied with the IRA process as extant or proposed without further comment;
- considerable support for a single approach (eliminating *routine* and *non-routine*);
- the need for improved transparency and consultation, desirability of early stakeholder contact, increased details of scientific information utilised, and wider availability of information in general from Biosecurity Australia;
- the need for a standardised methodology;
- the availability of appeals based on science;
- a greater contribution from independent experts;
- independent members of review and appeal panels;
- unhappiness with disparity of time periods allowed for Biosecurity Australia and industry input.



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A progress report to stakeholders, which includes significant stakeholder views and an analysis of stakeholder input, is the second document in the attached booklet.

A further revised framework (the first document in the attached booklet) has been developed to address the principle issues raised within the constraints of resources, obligations (domestically and internationally) and practicability. The most significant proposed changes are as follows:

- . Biosecurity Australia replaces the Australian Quarantine and Inspection Service (AQIS) to reflect changed responsibilities;
- . more regular advice would be made available to stakeholders with regard to the Biosecurity Australia IRA work program, utilising the Department of Agriculture, Fisheries and Forestry – Australia (AFFA) website and the new bi-monthly *Biosecurity Australia News*;
- . at an early stage in each IRA, AFFA would consult with the chief executive officers (CEOs) of the states and territories agriculture, fisheries and forestry agencies and with Environment Australia on the IRA work program and, for particular IRAs, the scope of the IRA and the issues likely to be raised, with a request that necessary scientific expertise from their agencies be made available;
- . an *IRA team* will conduct each IRA; the membership of the team would be governed by the availability of the necessary expertise within Biosecurity Australia and to what extent expertise external to Biosecurity Australia would be required;
- . the right of stakeholder appeal on scope of analysis, timetable and the membership of the *IRA team* would be extended to all IRAs;
- . for all IRAs, the initial paper for consultation with stakeholders would be a *technical issues paper*, covering similar ground to the issues paper currently prepared for more complex IRAs, and providing an opportunity for early stakeholder input into the science; the paper would list the pests and diseases which the IRA team had identified as needing to be assessed and seek stakeholder comment including any additional pests and diseases of concern;
- . all IRAs will be subject to *independent scientific peer review*;
- . the Executive Manager of Biosecurity Australia will seek advice from a *Scientific Advisory Panel*, when he or she considers it necessary to do so; and
- . all technical reports in final form, submissions and peer reviews will be placed on the public file.

Biosecurity Australia considers that the proposed revised administrative framework for IRAs, as described in the booklet, has incorporated appropriate responses to issues raised by stakeholders, within the bounds of Australia's international obligations, government policy objectives, scientific rigour, administrative efficiency and effectiveness and practicability.

Biosecurity Australia hopes that the enhanced stakeholder involvement during the early stages of all IRAs, while time and resource intensive, will lead to improved relationships, more transparent outcomes the scientific bases of which are understood by stakeholders, and reduced need for resort to appeal mechanisms.

The proposal that the Executive Manager of Biosecurity Australia would seek advice from a *Scientific Advisory Panel* only when he or she considers it necessary to do so differs from the approach indicated in the April memorandum that all IRAs would be referred to the panel. Biosecurity Australia considers that the level of independent review of the science now incorporated in the process renders further review by the *Scientific Advisory Panel* unnecessary except in circumstances when the Executive Manager of Biosecurity Australia requires additional assurance on the scientific arguments.

Biosecurity Australia is also using this memorandum to advise stakeholders of the completion of a working draft of the *Guidelines for Import Risk Analysis*. The *Guidelines* draws together AFFA's corporate experience in the conduct of IRAs, and input from risk analysts in state agriculture departments, the private sector and overseas government agencies.

The *Guidelines* is a technical reference document prepared specifically to assist Biosecurity Australia's scientific personnel in the conduct of IRAs. It is based on the relevant international standards for IRAs (the Office International des Epizooties (OIE) *International Animal Health Code* and *Aquatic Code*, and International Plant Protection Convention (IPPC) International Standards for Phytosanitary Measures (ISPM) *Pest Risk Analysis for Quarantine Pests*), and provides terminology and methodology that can be applied consistently to meet Australia's obligations under the World Trade Organization (WTO) Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement). The document will also be of interest and value to stakeholders reviewing new Biosecurity Australia IRAs. For this reason, the *Guidelines* will be placed on the AFFA Internet site and copies will be available to stakeholders (in paper or electronic form) from Judy Stoll at [bde@affa.gov.au](mailto:bde@affa.gov.au), telephone 02 6272 4914 and fax 02 6272 4568.

### **Next steps**

Stakeholders now have a further opportunity to comment on the detail of the proposed revised administrative framework and the uptake of their comments. Submissions are requested by 15 November 2001.

Stakeholder comment is also invited on the *Guidelines*. All submissions will be taken into account in reviews of the *Guidelines* to ensure Australia's IRAs continue to utilise best practice.

Biosecurity Australia is planning to hold a series of informal seminars on various aspects of risk analysis methodology later this year. It is hoped that these seminars will provide a forum for clarifying technical and other issues, and for reviewing the application of the *Guidelines*. Information on the seminars will be provided on the AFFA Internet site ([www.affa.gov.au](http://www.affa.gov.au)).

### **Confidentiality**

Respondents are advised that, subject to the *Freedom of Information Act 1982* and the *Privacy Act 1988*, all submissions received in response to Animal/Plant Biosecurity Policy Memoranda will be publicly available and may be listed or referred to in any papers or reports prepared on the subject matter of the memoranda.

The Commonwealth reserves the right to reveal the identity of a respondent unless a request for anonymity accompanies the submission. Where a request for anonymity does not accompany the

submission the respondent will be taken to have consented to the disclosure of his or her identity for the purposes of Information Privacy Principle 11 of the Privacy Act.

The contents of the submission will not be treated as confidential unless they are marked 'confidential' and they are capable of being classified as such in accordance with the Freedom of Information Act.

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