



19 February 2019

Dr Helen Scott-Orr
Inspector-General of Biosecurity
C/o Department of Agriculture and Water Resources
185 O'Riordan Street, Mascot NSW 2020

Dear Dr Scott-Orr,

Subject: Submission to Inspector-General of Biosecurity Review: *Assessment of the effectiveness of biosecurity measures to manage the risks of brown marmorated stink bug (BMSB) entering Australia ('BMSB Review')*

Thank you for affording the Australian Federation of International Forwarders (AFIF) the opportunity to provide a submission to the BMSB Review.

AFIF is the representative industry association for the International Freight Forwarding and 3rd party logistics industry, representing members in the areas of international air & ocean freight movement, Customs & Biosecurity; IT/E-Commerce; Training & Education; Security; Depot & Warehousing; etc.

AFIF has a long history in participating in various engagement forums with Government entities including; Treasury; Australian Taxation Office, Department of Agriculture and Water Resources (DAWR); Department of Foreign Affairs and Trade; Department of Home Affairs – Australian Border Force and Aviation and Maritime Security; Australian Maritime Safety Authority; State and local governments.

Specifically, AFIF's engagement with DAWR is comprised of AFIF's membership and active participation in:

- DAWR Import Industry Finance Consultative Committee (IIFCC)
- DAWR Cargo Consultative Committee (DCCC)

AFIF's participation in these forums provides us with an insight to the Department's response to BMSB - strategic, operational and financial.

AFIF supports the consultative approach taken by DAWR (the Department) to achieve best practice outcomes.

Following is AFIF's submission response, covering the objectives of the BMSB review include examining:

- the effectiveness of measures used by the Department to manage the risks of BMSB entering Australia,
- the Department's engagement and consultation with industry in managing the risks, and
- what, if any, improvements should be made to the current arrangements.

Background

BMSB Threat

- BMSB is a native of Japan, Korea, China and Taiwan and its global range is steadily increasing.
- First introduced to Pennsylvania in the 1990s, it is now found in 43 states in the USA and four Canadian provinces.
- In Europe, BMSB was first reported in 2008 near Zürich in Switzerland. Subsequently, it spread to Germany by 2012, Strasbourg in France and northern Italy by 2013, and Hungary by 2014.
- It is projected to spread further to nearby cool temperate countries and regions.

DAWR Response

- Prior to 2014, the Department found small numbers of live BMSB adults as hitchhikers on various goods from several countries.
- From December 2014 interceptions of very large numbers of live BMSB in cargo from the USA were detected, requiring the Department to put urgent response measures in place during the BMSB season of 1 September to 30 April.
- Between 2015 and 2017 the Department applied seasonal measures only to certain goods shipped from the US.
- In 2017–18 the Department initially extended measures to vehicles and machinery shipped from Italy, due to large detections of BMSB on these goods. Measures were then extended to a wide range of containerised goods from Italy due to high rates of BMSB detected on these goods.
- For the 2018–19 season the Department extended the seasonal measures to seven other European countries, as well as subjecting vessels from Japan to heightened monitoring and surveillance for BMSB.

Effects and Consequences

- In the BMSB season from 1 September 2018, this increased application of biosecurity measures to more goods imported from more countries resulted in substantial disruption to trade with industry concern.
- The Department is actively working to optimise pre-border and border measures to minimise disruption to industry.
- However, BMSB's continued spread means that intensified efforts on a wider front will be needed to keep it out of Australia.

AFIF Response

- AFIF understands the extent of the BMSB threat to date
- AFIF is concerned that DAWR's response has been largely reactive rather than pro-active
- Despite the intense and rapidly changing efforts by the Department, DAWR resources have once again been stretched in endeavouring to combat the BMSB threat
- DAWR has failed to meet the service standards KPIs in the DAWR Service Charter.
 - DAWR Officer Inspection appointments have blown out to 10 days in Sydney and Melbourne
 - The average processing time of a BMSB treated on-shore from lodgement of entry, and direction, inspection and fumigation can take up to 21 days
- Given the spread of the BMSB to new territories and its existence in countries adjacent to the listed target high risk countries, how can we be sure that the BMSB is not already on our shores?
- AFIF is concerned that the spread of the BMSB to new target high risk countries and target high risk goods will overwhelm DAWR's and industry's capability to respond to the BMSB threat

The effectiveness of measures used by the Department to manage the risks of BMSB entering Australia

- In short, it is acknowledged that the Department's measures appear to have prevented BMSB from entering Australia to date – a mixture of management tactics and good luck.
- The measures implemented by DAWR to date have been a mixture of fixed and interim measures, which have often been introduced with little notice.
- Preparations for 2018-19 Seasonal Measures were delayed.
- Establishing the Target High Risk Countries and Target High Risk Goods and communicating these details to industry occurred barely 2 months before commencement of the BMSB Season
- There were insufficient approved offshore treatment providers to accommodate the sudden escalation in volumes in all of the target high risk countries and major ports in adjacent countries.
- The lack of coverage of offshore treatment providers led to more containers arriving without treatment, creating major delays in DAWR processing shipments and the treatment providers becoming overwhelmed with containers to be treated.
- The average processing time of a BMSB container treated on-shore from lodgement of entry, direction, inspection and fumigation can take up to 21 days
- DAWR Officer Inspection appointment delays of 10 days in Sydney and Melbourne
- Importers faced container storage and detention fees due to the delays. An AFIF member has reported that their customer has allegedly paid in excess of \$300,000 in container storage and detention, to date, this BMSB season.

The Department's engagement and consultation with industry in managing the risks

- Industry engagement on BMSB measures has been through hastily convened DCCC teleconferences.
- Measures proposed by DAWR are usually presented to the DCCC for 'industry engagement and review' but in some instances industry feedback contradicting the practicality of undertaking certain measures have been disregarded and the Department has forged ahead
- There have been instances where a measure has been hurriedly presented to a hastily convened DCCC teleconference 'consultation' requiring 'immediate implementation' without time to adequately assess the impact of the measure to industry, leading to consequential delays, costs and dislocation to industry
- The DAWR BMSB industry information sessions held in July and August were meaningful, providing industry stakeholders with the opportunity to learn about the seasonal measures for the 2018-19 BMSB season and to ask questions of key DAWR BMSB management.
- However the information sessions were held too late, the approvals of offshore treatment providers were too late, which led to a significant number of enquiries to the DAWR call centre and impacted industry associations' resources in keeping members informed of the constantly changing measures.

What, if any, improvements should be made to the current arrangements

- Undertake a strategic review of all of the learnings from the current season
- A more strategic approach to be undertaken by DAWR in conjunction with industry stakeholders to the preparation of BMSB seasonal measures for 2019-20 season
- More industry engagement and consultation well in advance of the 2019-20 BMSB season to settle on fixed arrangements to enable industry stakeholders to better prepare for the 2019-20 seasonal measures
- Fixed 2019-20 BMSB Seasonal Measures to remove 'policy-on-the-run' introduction of 'interim measures', with little or no Notice to industry after the season is underway.
- If more target high risk countries and target high risk goods are added to the current lists, this is communicated to industry stakeholders as early as possible, to enable greater industry awareness and preparation
- A significantly boosted DAWR team of experts approving offshore treatment facilities, to maximise the number of treatment facilities for industry to access, well in advance of the 2019-20 season

- If a significant and adequate number of approved offshore treatment facilities are in place in all of the target high risk countries next season, then consider greater incentives for offshore treatment and deterrents for onshore treatment. However, deterrents for onshore treatment cannot be 21 days delays processing, as it is now.
- DAWR has produced a document 'Safeguarding Arrangements for BMSB' which permits industry to perform defined functions, such as pest management, goods storage, movement, treatment, operational/administrative procedures, or processing of imported goods, without direct supervision by the Department. (refer attachment) There has been very little if any communication with industry that such a document exists. An application that an AFIF Member lodged in December 2018 has still not received an official reply, only a phone call advising of 'possible' rejection.
- Consider allowing FAK consolidated containers of untreated LCL shipments to be transferred under Customs and DAWR control to an Approved Arrangement holder's facility. Allow authorised personnel to undertake BMSB inspection of the container, on behalf of DAWR and to notify any instances of BMSB discovered to a DAWR Hotline, thereby reducing the load and delays in DAWR officer appointments.
- Increase DAWR human resources to better handle the increased challenges for 2019-20 BMSB Season, especially if the number of target high risk countries, target high risk goods and vectors increase as expected.
- Consider DAWR funding of an industry experts panel of the major stakeholder associations affected by BMSB operational policy – AFIF, CBFA, FTA & SAL, to provide a reference point for DAWR in preparing policy and procedures, before releasing to DCCC or publicly.

Conclusion

AFIF has outlined its position on the '*Assessment of the effectiveness of biosecurity measures to manage the risks of brown marmorated stink bug (BMSB) entering Australia.*'

AFIF has provided what we believe to be a fair representation of the Department's performance to date. There are areas which require improvement in planning and executing the 2019-20 BMSB Seasonal measures.

There are resource funding issues to be considered by the Department, in better supporting key industry associations input to developing strategic and operational BMSB policy and procedures, well in advance of the BMSB season and ongoing throughout the season.

Furthermore, AFIF would like to acknowledge the efforts of senior managers and team managers in managing the current BMSB season. It has been a difficult period for all stakeholders, though the Department has been communicative with AFIF and other industry stakeholders throughout.

AFIF will continue to represent AFIF members in engaging with the Department in a joint effort to continue to keep Australia free of BMSB. Thank you for the opportunity to participate in this review.

Yours Sincerely

Australian Federation of International Forwarders



Brian Lovell,
Chief Executive Officer

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