

Submission on the effectiveness of biosecurity measures Brown Marmorated Bugs (BMSB)

Executive Summary

- There are significant gaps in present regulation that pose a major risk to Australia's agricultural sector.
- There is an urgent need to change regulations to prevent BMSB from being shipped in cargo destined for Australia and New Zealand.
- The Department of Agriculture and Water Resources (DAWR) to identify clearly all countries where BMSB are present as high risk and apply consistent regulation to all of them.
- Biosecurity regulation needs to be consistent between Australia and New Zealand.
- When BMSB are found, clear and workable treatment solutions need to be established so they can be implemented consistently. Ideally, a focus on early detection and treatment should be the priority.
- Current regulation has a significant effect on the Australian economy, with delays to essential imports disrupting critical industries and costs running into many millions of dollars.
- Biosecurity inspection, treatment and verifications should ideally be completed prior to the vessel berthing to minimise impact on terminal and stevedoring activities.

Qube Ports' commitment to biosecurity

- Qube is committed to maintaining the highest standards of biosecurity, takes great care to inform our workforce and contractors of DAWR requirements for identification, reporting and prevention of BSMB.
- Qube trains all employees in accordance with the regulations including the requirement to report any observed BSMB activity to DAWR.

Effectiveness of BMSB offshore management measures

- It is clear, despite regulations and clean cargo requirements that contaminated cargo is still being presented for shipment, thereby placing all stakeholders at risk.

Countries with BMSB not classified as 'high-risk'

- A contributing factor to the partial effectiveness of the current approach is that many countries are not identified as high risk despite being known BMSB sources. These include numerous countries in Europe; for example, although France and Germany are categorised as high risk, Belgium is not. China, which genetic analysis indicates was the source of the introduction of BMSB into the USA, is not considered 'high risk'.
- The application of consistent regulation to all countries where BMSB are present as high risk. This will enable the industry to reduce BMSB contamination at the source and enforce appropriate treatment for cargo before shipping. This will also increase confidence that cargo will be discharged at the destination port.
- Existing regulation does not currently take into account transshipment supply chains, where components, units during assembly and cargo may spend significant time in BMSB-infected areas, despite the country of origin not being considered high risk.

Lack of regulation impedes carriers' abilities to enforce safety procedures

- Shipments on vessels from countries deemed 'high risk' must undergo mandatory treatment prior to loading, if DAWR has not specified that a country is high risk the cargo will not undergo BMSB treatment by the cargo owner.
- Gaps in regulation are placing the onus on carriers to explain, justify and advocate regulatory requirements to cargo owners in Europe. While major European exporters are aware of the BMSB threat to Australia and New Zealand, many exporters are unaware of the BMSB risk and further education is necessary.
- A method for the identification and management of BMSB from non-high risk countries during transit would significantly reduce the impact on the stevedore, allowing the ability to plan and manage labour requirements prior to the vessel arriving.

Australian and New Zealand regulation needs alignment

- Australian and New Zealand regulations need to be aligned to increase protection against BMSB. Differences for air temperature and fumigation concentration levels needed for pre-treatment of cargo are not aligned for the two countries.
- Alignment will reduce the risk of errors and of cross contamination between treated and untreated cargo from the same country.

BMSB profiling, assessment, inspection and treatment

Need for clear and workable solutions

- Once bugs are discovered, the industry requires agreement on clear and workable solutions which can be implemented prior to vessel discharge operations (these maybe off-shore or in transit).
- Investigation of establishment of offshore licensing of facilities by DAWR to ensure cargo identified as requiring treatment, are effectively treated to an agreed standard.
- When BMSB are found, regulators may specify that treatment by heat, methyl bromide or sulphuryl fluoride must be conducted. These treatments are toxic to insects but are difficult, if not impossible, to administer when the vessel is at sea, as they can cause damage to cargo and the health of the crew. These risks mean that a range of treatments may need to be used, crew disembarked and cargo unloaded. These treatments, impact terminal and stevedoring operations.
- Treatment once arrived in destination Port, may also be ineffective or impossible due to restrictions relating to OHS of vessel crew and the inability to discharge cargo (due to risk of BMSB infecting local environment when transiting from vessel to on-wharf treatment facility).
- Use of methyl bromide and sulphuryl fluoride are not permitted in many countries. Methyl bromide is not approved in the EU and is being phased out in the US. Sulphuryl fluoride is not approved within the borders of New Zealand and is banned in NSW. There is a need for additional approved fumigation treatments that eliminate the risk of BMSB.
- The industry has encouraged change and is now calling on the government to act decisively to develop clear processes and workable solutions for when BMSB are found. These are needed to ensure effective coordination of terminal activities (i.e. berthing protocols) and associated management of labour.

Accreditation of offshore and onshore treatment providers

- If new countries are added to, or even just to accommodate current, Australia's list of BMSB 'high risk' countries, new treatment centres will need to be approved and built. As lead times to develop treatment centres take several months, an early decision is recommended to avoid a shortage of offshore treatment providers in the 2019-20 BMSB season which will begin in September 2019. An existing facilitate, Bintan Offshore Marine Centre, based on the Indonesian Island of, Bintan is an existing facility that has successfully been used for treatment this season.

Engagement with industry

- While DAWR provides services during business hours, the shipping industry operates 24x7. The industry requires inspectors to be available on a 24-hour basis which will enable faster turnaround and inspection times and reduce delays in cargo movement. A normal vessel turnaround time is around 12-16 hours and delays due to unavailability of inspectors can easily treble that time.
- DAWR requires inspection on berthing but the demands from the terminal, which need the vessel to be fully ready for discharge on berthing, are contradictory. If vessel unloading is delayed by need for an inspection, the stevedore may replace the vessel at the berth.
- Also, while stevedores require labour to be booked by 1400hrs on the previous working day (or on Friday if over a weekend), there are long delays as vessels have to wait for the outcomes of DAWR inspections. Many stakeholders need to co-ordinated to begin vessel operations, and delays have resulted in significant industry costs.
- Qube notes that inspectors at the wharf may be unable to distinguish BMSB from other bugs that may be present in cargo. The need to consult entomologists either locally or in Canberra (who may be available only during their business hours) is also the cause of significant delays.
- Qube calls on DAWR to develop a process that enables inspectors to recognise BMSB at inspection; and empowers them to provide a decision or further direction on completion of inspection.
- To reduce impact of BSMB identification at destination Port, Qube suggest DAWR investigate inspection prior to vessel berthing. This could be achieved through inspection at anchor or an inspection regime on-route, which would allow deviation to treatment facility if required, reducing costs to vessels, etc.....
- As DAWR may on occasion be short-staffed, it would be helpful if a number of DAWR's tasks could be outsourced to other accredited parties.
- Where vessels have cargoes with certified mandatory treatments, fogging en-route, and only dead or no bugs reported, these cargoes should be considered low risk. This would allow routine inspection instead of the more detailed 'seasonal' inspection, reducing focus on low risk cargoes and enabling DAWR inspections to begin on arrival.
- The impact of vessels being quarantined significantly impacts on Qube's ability to managed stevedoring labour supply.

A summary table of recommendations has been provided on the following page.

Table 1 – Recommendations table

Issues	Solutions	Practicalities
Inconsistent BMSB requirements in Europe	Identify all European countries as high risk	Countries need time to install treatment facilities
Inconsistent BMSB requirements in Asia	Identify China, Japan and Korea as high risk	Time needed to educate cargo owners, appoint treatment providers and install treatment facilities
Different requirements for Australia and New Zealand	DAWR to align biosecurity regulation with MPI New Zealand	Need to increase inspections and add further countries as 'high risk'
Delays to turnaround vessel inspections (On-shore Treatment)	Extend working hours of inspectors and entomologists to 24x7 Consider use of trained detector dogs for infestation identifications.	Increase pool of DAWR resources and skilled staff; or subcontract inspection. Training of detector dogs.
Terminal congestion and terminal operational impact due to contaminated vessels being berthed. (On-shore Treatment)	Off-shore inspection by DAWR prior to vessel come along side within terminal	Training, fitness for work and other Off-shore requirements for DAWR inspectors.
Labour management / Fatigue management (on-shore Treatment)	As above. Increase laboratory assessment operations to 24 hours and locate at major import Ports (Brisbane and Fremantle)	DAWR require time to establish testing facilities in close proximity to Fremantle and Brisbane Ports.
Lack of clear evaluation of vessels during inspection	Consistent processes reducing variation of outcomes from inspection results	Detailed processes provided for industry with clear outcomes
Lack of on-board treatment advice to manage risk, cargo sections or individual units	DAWR to approve on-board solution to manage localised risk	Need to enable local risks to be treated on board or in isolation onshore, rather than requiring treatment for the entire vessel
Inconsistent industry compliance procedures	Regulation to ensure the responsibility for presenting clean cargo rests with cargo owners	Ensure regulators are aware of repercussions of regulation
Lack of DAWR engagement with the market to ensure cargo owner awareness	DAWR engagement with trade commissioners and Austrade	DAWR marketing resources