

The Auditor-General
Audit Report No.47 2009–10
Performance Audit

Management of Live Animal Imports

Department of Agriculture, Fisheries and Forestry

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of Australia 2010

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Canberra ACT
23 June 2010

Dear Mr President
Dear Mr Speaker

The Australian National Audit Office has undertaken a performance audit in the Department of Agriculture, Fisheries and Forestry in accordance with the authority contained in the *Auditor-General Act 1997*. I present the report of this audit and the accompanying brochure. The report is titled *Management of Live Animal Imports*.

Following its presentation and receipt, the report will be placed on the Australian National Audit Office's Homepage—<http://www.anao.gov.au>.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ian McPhee', is positioned above the printed name and title.

Ian McPhee
Auditor-General

The Honourable the President of the Senate
The Honourable the Speaker of the House of Representatives
Parliament House
Canberra ACT

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Abbreviations and Glossary

AIMS	Australian Quarantine and Inspection Service's Import Management System that is used to record decisions made during the entry management process and communication with the importer.
Animal	A live animal or viable animal material including the ovum, semen and embryo of an animal but not including any other biological product.
Biosecurity Services Group	Division of the Department of Agriculture, Fisheries and Forestry responsible for managing Australia's quarantine and biosecurity system.
CAR	Corrective Action Request
Consignment	One or more goods imported to Australia as a single transaction.
DAFF	Department of Agriculture, Fisheries and Forestry
Disease	A disease may be a micro-organism, a disease agent, an infectious agent or a parasite.
ICON	Import conditions database that holds information about the import requirements for more than 20 000 plant, animal, microbial, mineral and human products.
Import	<p>In relation to animals, animals that have been:</p> <ul style="list-style-type: none">• brought into Australia from a place outside Australia; and• unloaded from a vessel such as a plane or boat onto land in Australia.
Import conditions	Requirements for an imported animal to be eligible for importation.

Import permit	A permit granted by the Director of Quarantine (or his/her delegate) to import goods into Australia.
Level of quarantine risk	<p>Section 5D of the <i>Quarantine Act 1908</i> defines the level of quarantine risk as being:</p> <p>(a) the probability of:</p> <ul style="list-style-type: none"> – a disease or pest being introduced, established or spread in Australia, the Cocos Islands or Christmas Island; and – the disease or pest causing harm to human beings, animals, plants, other aspects of the environment or economic activities; and <p>(b) the probable extent of the harm.</p>
Pest	A pest includes any animal that is considered to be a pest.
Post-Entry Quarantine System	The Post-Entry Quarantine System (PEQS) is a database used by government-run quarantine stations to capture data about live animals in quarantine.
Prohibited goods	Goods (including live animals) the importation of which is prohibited by the <i>Quarantine Proclamation 1998</i> unless an import permit has been granted or other requirements have been satisfied.
Quarantine Approved Premises	Quarantine Approved Premises (QAP) are places approved under s.46A of the <i>Quarantine Act 1908</i> for the performance of quarantine-related activities including quarantine isolation.
Quarantine Premises Register	The Quarantine Premises Register (QPR) is a register of places approved for the performance of quarantine-related activities.

Summary and Recommendations

Summary

Background and context

Introduction

1. Australia's quarantine and biosecurity system aims to minimise the risk of the entry, establishment or spread of exotic pests and diseases¹ that have the potential to cause significant harm to people, animals, plants and other aspects of Australia's unique environment.² The importation of live animals potentially exposes Australia to exotic pests and diseases such as rabies, foot and mouth disease, Newcastle disease and avian influenza. Outbreaks of exotic animal diseases are not common in Australia, but when they do occur, such as the equine influenza outbreak in August 2007, they can be disruptive and costly.

2. Australia allows a range of live animals to be imported.³ DAFF advised that between 1 July 2007 and 31 December 2009, 30 031 consignments of live animals were imported into Australia. These included: 22 584 consignments of dogs and cats; 5050 consignments of ornamental finfish; 1263 consignments of reproductive material; 16 consignments of hatching eggs; 900 consignments of laboratory animals; and 30 consignments of zoo animals. The remaining 188 consignments included horses, pigeons and alpacas.

Administrative arrangements for live animals

3. The Department of Agriculture, Fisheries and Forestry's (DAFF) Biosecurity Services Group is responsible for managing Australia's quarantine and biosecurity system. Quarantine policy is developed nationally, with regional offices managing quarantine operations at the border, supported by instructional material and advice from national programs areas.

¹ A pest includes any animal that is considered to be a pest. A disease may be a micro-organism, a disease agent, an infectious agent or a parasite.

² Beale, Fairbrother, Inglis and Trebeck, *One Biosecurity: A Working Partnership—The Independent Review of Australia's Quarantine and Biosecurity Arrangements Report to the Australian Government*, September 2008, p.xiii.

³ Section 52 of the *Quarantine Act 1908* defines an animal as 'the following that has been imported and not released from quarantine: a live animal or viable animal material and includes the ovum, semen and embryo of an animal but does not include any other biological product'.

4. The Biosecurity Services Group was established on 1 July 2009 when the functions and responsibilities of the Australian Quarantine and Inspection Service, Biosecurity Australia and DAFF's Product Integrity, Animal and Plant Health division and the Quarantine and Biosecurity Policy Unit were integrated. Prior to 1 July 2009, quarantine risks presented by goods arriving at the border, including live animals, were managed by the Australian Quarantine and Inspection Service. Biosecurity Australia assessed quarantine risks and provided advice on the effective management of these risks.

Approach to managing quarantine risk

5. DAFF determines, through a risk assessment, the level of quarantine risk presented by the importation of a live animal.⁴ The assessment takes into account the country of export and the purpose of importation. Importation is possible if either the risk that the animal is carrying a quarantinable pest or disease is acceptably low or the risk can be managed through import conditions. Conditions can be applied: prior to importation to minimise the likelihood that quarantinable pests and diseases will be imported; on arrival at the border; and/or post-entry. Conditions may include, for example, periods of quarantine isolation, testing for disease and treatments for pests such as ticks. Any import conditions are stated on the import permit and are publicly available on DAFF's website. The importation of live animals generally requires a permit.⁵ In 2008–09, DAFF issued 8195 import permits for live animals.

Entry management

6. On arrival at the border, consignments and the accompanying documentation—a permit (if applicable) and a veterinary certificate from the exporting country confirming that pre-export conditions have been met—are examined by quarantine officers. Consignments are then either ordered into quarantine or released to the importer. A consignment is ordered into quarantine when post-entry quarantine is required by the import conditions or

⁴ The level of quarantine risk refers to the probability of a disease or pest being introduced, established or spread; the probability of the disease or pest causing harm to human beings, animals, plants, the environment or the economy; and the probable extent of the harm.

⁵ Importation is prohibited by the *Quarantine Proclamation 1998* unless an import permit has been granted or other requirements have been satisfied. For dogs and cats imported from New Zealand, the conditions for these animals are specified in s.37 (2 and 3) of the *Quarantine Proclamation 1998*.

when it is necessary to detain, treat, re-export or destroy a consignment to manage identified quarantine risks. A consignment will be released if all import conditions are met. Officers may apply conditions of quarantine surveillance when releasing the animal that, for example, restrict the animal's contact with other animals and require the importer to provide a veterinary report on the animal's health after a specified period of time.

7. DAFF provides instructional material for officers responsible for managing the entry of live animals. This material outlines the processes to be followed and the documentation to be completed by quarantine officers.

Post-entry quarantine facilities

8. Periods of post-entry quarantine allow DAFF to monitor an animal's health and identify any disease concerns prior to the animal's release into Australia. Most animals imported into Australia must spend time in isolation at a quarantine facility, which is either a quarantine station managed by DAFF or a Quarantine Approved Premises (QAP) managed by a private operator.

9. Quarantine facilities are designed to securely accommodate a particular species of animal and to limit the spread of quarantinable pests or diseases that may be present.⁶ Facilities for dogs and cats are designed to separate the animals. Animals are examined by a veterinarian on arrival and prior to being released from the quarantine station. Imported eggs are sealed in biological containment facilities and cannot be released until test results indicate they are free of quarantinable diseases. QAPs are approved by DAFF and their compliance against national standards is regularly assessed.

Reviews into quarantine arrangements

10. In recent years, there have been two major reviews of Australia's quarantine arrangements:

- the Callinan inquiry into the cause of the outbreak of equine influenza; and
- the Beale review of Australia's quarantine and biosecurity arrangements.

⁶ Diseases are generally transferred through contact or contaminated water or feed, but some diseases can be airborne.

The Callinan inquiry into the cause of the outbreak of equine influenza

11. As previously noted, in August 2007, there was an outbreak of the equine influenza virus that the Callinan inquiry concluded had most likely escaped from the Eastern Creek Quarantine Station, which is managed by DAFF. Horses are imported for racing, breeding and recreational purposes, and generally require a period of post-entry quarantine. Horses are quarantined on an 'all-in-all-out' basis and, while in quarantine, they are regularly accessed by the importer's grooms, farriers and veterinarians. The Australian Government spent more than \$342 million eradicating the virus and providing financial assistance to affected individuals, organisations and businesses.

12. The inquiry into the cause of the outbreak was led by the Honourable Ian Callinan AC and found that the virus had most likely escaped due to systemic organisational weaknesses in the then Australian Quarantine and Inspection Service's approach to biosecurity and quarantine processes. The April 2008 inquiry report, *Equine Influenza: the August 2007 outbreak in Australia*, made 38 recommendations. These included establishing a position of Inspector General in charge of horse importation, revising the *Quarantine Act 1908* and reviewing operational procedures and horse importation risk assessments. The Government agreed to all recommendations in June 2008.

The Beale review of Australia's quarantine and biosecurity arrangements

13. In February 2008, the Minister for Agriculture, Fisheries and Forestry appointed an independent panel, chaired by Roger Beale AO, to conduct a comprehensive review of Australia's quarantine and biosecurity systems. The panel's September 2008 report, *One Biosecurity: A Working Partnership—The Independent Review of Australia's Quarantine and Biosecurity Arrangements Report to the Australian Government*, made 84 recommendations aimed at extensively reshaping the framework and delivery of Australia's quarantine and biosecurity systems. The recommendations included reviewing the *Quarantine Act 1908*, DAFF's information technology systems and quarantine facilities (including quarantine stations). The review also recommended restructuring the areas responsible for biosecurity functions and moving to a risk-return approach for managing biosecurity and quarantine. The recommendations were agreed to in principle by the Government in December 2008, subject to Budget processes.

DAFF's response to the reviews

14. At the time of the audit, DAFF was taking steps to implement the recommendations made by the independent reviews. DAFF advised that, because the Callinan inquiry had clearly identified horses as a high biosecurity risk, additional resources were initially allocated to improving the biosecurity and quarantine processes for horses. The Government has engaged Professor Peter Shergold AC to provide the Minister for Agriculture, Fisheries and Forestry with assurance that the recommendations from the Callinan inquiry are being effectively implemented. Professor Shergold provided his fourth report to the Minister in March 2010, and he is scheduled to provide oversight until June 2010.

15. The findings of the reviews were also applicable across multiple commodities (including live animals). DAFF advised that as the work relating to the implementation of the Callinan inquiry recommendations nears completion, resources will be moved to support the work that is already underway to improve biosecurity and quarantine processes for other live animal species. In addition, the department is:

- drafting new biosecurity legislation;
- redesigning information technology systems;
- developing the methodology for a risk–return approach to biosecurity activities; and
- reviewing the status of quarantine stations and their future management arrangements.

Audit objective and scope

16. The audit objective was to examine how effectively the Department of Agriculture, Fisheries and Forestry (DAFF) manages the importation of live animals into Australia. Particular emphasis was given to the:

- assessment and approval of permit applications;
- management of quarantine risks associated with the importation of live animals;
- arrangements for post-entry quarantine; and
- approval and auditing of Quarantine Approved Premises.

17. The audit did not examine the development of quarantine policy, the assessment of import risks or the detection of illegally imported live animals.

18. To assess the effectiveness of DAFF's importation processes, the ANAO reviewed a sample of 207 consignments imported during the period 1 October 2007 to 30 September 2009.⁷ The consignments included dogs, cats, fish, hatching eggs, reproductive material and animals imported by zoos and laboratories.⁸ The sample covered consignments received during the following periods: two consignments in 2007; 14 consignments in 2008; and 191 consignments in 2009.

19. To examine DAFF's approval and ongoing management of Quarantine Approved Premises, the ANAO reviewed documentation for 131 audits undertaken at 39 Quarantine Approved Premises between 27 October 2004 and 9 November 2009.⁹

Overall conclusion

20. DAFF's Biosecurity Services Group is responsible for managing the quarantine risks presented by goods arriving at Australia's border, including live animals. The importation of live animals exposes Australia to potential disease outbreaks, which can be disruptive and costly. Australia is presently free of many animal diseases, which have the potential to harm people, agriculture and the environment.

21. Australia's current disease-free status is an important indicator of the effectiveness of quarantine arrangements. However, as highlighted by the Callinan inquiry, this status does not provide forewarning of potential weaknesses in the quarantine and biosecurity system. The Callinan inquiry into the equine influenza outbreak and the Beale review into the broader arrangements for managing quarantine and biosecurity risks identified weaknesses in Australia's quarantine arrangements. Implementing the

⁷ Documentation for the ANAO's sample was held on electronic systems and in hard copy. Cargo arriving at the border is tracked by DAFF using the Australian Quarantine and Inspection Service's Import Management System (AIMS). Animals held at DAFF-run quarantine stations are tracked with the Post-Entry Quarantine System (PEQS).

⁸ The number of animals and consignments in the ANAO's sample is outlined in Table 1.1.

⁹ The audits covered during this period were: two in 2004-05; three in 2005-06; 11 in 2006-07; 28 in 2007-08; 65 in 2008-09; and 22 in the period 1 July to 9 November 2009.

recommendations from these reviews will mean widespread changes and potential improvements to the management of Australia's quarantine system.

22. In relation to the importation of live animals, DAFF has established a sound framework for managing quarantine risks. The department assesses quarantine risks and imposes import conditions pre-entry, at the border and post-entry to mitigate these risks. Pre-entry conditions are aimed at addressing quarantine risks prior to an animal's arrival in Australia, and periods of post-entry quarantine provide further assurance about an animal's health prior to its release from quarantine.

23. Instructional material outlines the processes underpinning Australia's quarantine arrangements. Following the Callinan inquiry, the department has focused on improving its instructional material for all imported live animals. Existing guidance has been progressively updated and new instructional material has been released for quarantine facilities and some animal groups. Verification programs were also implemented to provide assurance that instructional material is appropriate and being interpreted and implemented correctly. However, the Live Animal Import program's verification program does not include checking the completeness and accuracy of documentation.

24. The audit highlighted that the documentation of examinations and quarantine decisions that are required by departmental procedures was deficient for the majority of the 207 consignments reviewed by the ANAO. The absence of appropriate documentation undermines the department's ability to be confident that quarantine processes are being implemented effectively.

25. There was limited or no documentation to demonstrate that officers had examined either the import permit, veterinary certificate and/or the animal(s) for 133 (64 per cent) of the 207 consignments. In addition, for 34 consignments, the decision to order the consignment into quarantine was not documented, but the ANAO was able to locate some documentation to indicate that these animals had been in quarantine. For 29 consignments, the appropriate release from quarantine form was not completed as required by departmental instructions and, in five instances, the documentation to support the seizure and destruction of fish was missing.

26. The introduction of revised instructions and additional checklists in late 2009 means that officers should be documenting examinations for most imported live animals. These instructions outline officers' responsibilities, and the verification program is designed to confirm that instructions have been understood. The findings of this audit have identified the need for DAFF to

reinforce to officers, and particularly those responsible for supervising and training staff, the importance of documenting quarantine processes and decisions. Extending the verification program to include checking the completeness and accuracy of documentation would provide assurance that procedures are also being effectively implemented.

27. Currently DAFF's electronic systems only provide information about imports, not the completion and outcomes of examinations. As a consequence, they do not support the analysis of data to inform compliance strategies and highlight emerging quarantine risks and operational issues. To collect and analyse data relating to importation and quarantine processes nationally, DAFF will need to develop an approach for recording examinations on a consistent basis.

28. Animals ordered into quarantine are sent to either a quarantine station or a QAP. There are arrangements in place for managing access to, and the security of, these facilities, monitoring animal health and wellbeing and controlling animal-specific quarantine risks. DAFF approves QAPs and conducts audits to monitor QAPs' compliance with the conditions of approval and the criteria relevant to each QAP class.

29. Audit reports that detail the outcome of QAP audits have been a requirement since May 2009. However, for the 32 audits in the ANAO's sample that required reports, 22 reports had not been completed. Although audit checklists were available for all audits examined, they did not clearly record the extent of checking by the quarantine auditor. Also, there are no systems or processes in place to monitor corrective action where non-compliance is identified, and follow-up action is at the discretion of the individual quarantine auditor. As a consequence, DAFF has limited assurance that QAPs are meeting all requirements.

30. The ANAO has made two recommendations aimed at providing DAFF with greater assurance that import conditions are being met and QAPs are complying with the conditions of approval and the relevant criteria. Timely action on these recommendations is important, for the department to have confidence that its framework for managing quarantine risks is delivering the intended results.

Key findings by chapter

Preparing to import a live animal (Chapter Two)

31. Importers are required to comply with the import conditions applicable to the animal being imported.¹⁰ The department has clearly documented these conditions, which generally require importers to apply for an import permit and obtain a veterinary certificate from the exporting country prior to importing an animal into Australia.

32. Potential importers had access to sufficient information to enable them to understand importation requirements and the permit application process. The assessment and approval of import permits was effectively managed by DAFF and supported by instructional material.

Certificates provided by exporting countries

33. DAFF relies on assurances provided by exporting countries that pre-import conditions have been met. A country's certifying authority is assessed and approved by DAFF as being able to provide informed and reliable certification that Australia's quarantine requirements have been met. DAFF monitors the pest and disease status of exporting countries through the World Organisation for Animal Health's monitoring framework. The department also obtains information through its agricultural counsellors (stationed at key diplomatic posts) and from informal sources such as media reports. If necessary, on-site inspections are conducted.

34. Non-compliance by exporting countries is reported by the regions and dealt with on an individual consignment basis by the national program. DAFF did not collate these reports and analyse compliance trends by exporting countries until February 2009 when the national program began its Non-compliance Project.

35. Data for dogs and cats imported from countries in categories two to five¹¹ has been analysed for the periods February to May 2009 and July 2009 to February 2010.¹² DAFF advised that, for these periods, 5530 dogs and cats had

¹⁰ Import conditions for live animals are developed from an assessment of import risks.

¹¹ Countries that import dogs and cats have been categorised (from one to six) based on the country's control over rabies. For this group of dogs and cats, a national checklist was already in place for officers to record their assessment of veterinary certificates' compliance with import conditions.

¹² DAFF did not analyse data for June 2009.

been imported and their certificates checked. Of these certificates, 824 (14 per cent) had been identified as non-compliant. Issues identified ranged from minor administrative errors to major non-compliance that had resulted in the animal being exported. DAFF advised that the data will be used to inform the risk assessments and the reviews of exporting countries' systems. The department further advised that feedback about repeated non-compliance has been provided to one exporting country.

36. A new checklist was developed and implemented nationally in August 2009 to collect data about non-compliant veterinary certificates for imported live fish. With the inclusion of fish imports, DAFF now collects non-compliance data for the majority of live animals imported into Australia. DAFF advised that the department is yet to finalise how it will analyse and report on the data for fish consignments.

Monitoring compliance with import conditions (Chapter Three)

37. Appropriately applied import conditions limit the likelihood that exotic pests and diseases will enter Australia. Quarantine officers in the regions are responsible for ensuring the importer complies with these conditions. When a consignment arrives at the border, the importer is required to present the import permit, the veterinary certificate from the exporting country and any other required documentation for examination.¹³ The consignment can be detained (in quarantine isolation), treated, re-exported or destroyed if there are any potential quarantine risks. If all import conditions have been met, the consignment will be released.

Guidance about the management of imported live animals

38. Following the Callinan inquiry, DAFF revised its instructional material for managing imported live dogs and cats, reproductive material, fish and animals imported by zoos and laboratories.¹⁴ New instructional material was released for managing imported hatching eggs in December 2009.

39. In addition, a verification program was implemented in 2008-09. The verification activities conducted to date have focused on providing assurance

¹³ A permit was not required for dogs and cats imported from New Zealand.

¹⁴ Instructional material for imported dogs and cats included separate guidance on the following areas: dogs and cats from New Zealand (category one); dogs and cats from countries in categories two to five; and disability assistance dogs.

that instructional material is appropriate and officers are interpreting the guidance as intended. The completeness and accuracy of the documentation for imported consignments is not reviewed as part of this program. Extending the verification program to include a quality assurance check of the documentation for a sample of consignments would provide greater assurance that instructional material had not only been understood, but also properly implemented.

Managing quarantine risk on importation

40. Officers are to examine the permit, veterinary certificate and consignment to establish that the animal(s) is allowed to be imported and that no other material of quarantine concern is present. Officers must order the consignment into quarantine if the import conditions require the consignment to undergo post-entry quarantine or if the import conditions have not been met. Alternatively, the consignment can be released if the import conditions have been met.

Documenting on-arrival examinations

41. For 122 of the 207 consignments in the ANAO's sample, officers were required to use nationally consistent checklists or forms to record their examinations of the import permit, the veterinary certificate and the consignment. Of these, 48 (39 per cent) had missing or incomplete documentation.

42. For the remaining 85 consignments in the ANAO's sample, the department had not provided instructions about recording examinations.¹⁵ For these consignments, examinations had been recorded on a discretionary basis or no documentation was available to demonstrate that an officer had examined the consignment and confirmed that it was compliant with all import conditions. Officers had recorded notes in the comments field of the import's electronic record or kept discretionary hard copy records such as annotated certificates, personal checklists and notes in personal diaries.¹⁶

¹⁵ DAFF did not provide instructions about recording the outcomes of the examination process for dogs and cats from New Zealand, animals imported by zoos and laboratories and reproductive material. Instructional material relating to the documentation of examinations for disability assistance dogs and fish was introduced in July and August 2009 respectively.

¹⁶ Notes made in the comments field of the import's electronic record cannot be found through electronic searches or analysed.

Order into quarantine

43. From the ANAO's sample of 207 consignments, 168 were ordered into quarantine. Of these, post-entry quarantine was a condition of importation for 160 consignments. The remaining eight consignments were ordered into quarantine to manage potential quarantine risk or to allow time for officers to check documentation. There were 34 consignments that did not have a record of the consignment being ordered into quarantine. However, there was other documentation available, such as a release from quarantine, showing that the animal had been at a post-entry quarantine facility.

Release without post-entry quarantine

44. Of the 207 consignments, 39 were released on arrival as all import conditions were met. Of these, 15 consignments were released under quarantine surveillance. Quarantine surveillance allows DAFF to monitor animals and may require the importer to provide evidence that the animal's health has been checked by a veterinarian. The release from quarantine under surveillance was not documented in three instances.

45. Disability assistance dogs are to be under quarantine surveillance for at least 30 days. Although the conditions are part of the import permit, the dog's handler is required to sign a form agreeing to the conditions of surveillance. A signed form was not available for nine of the 16 dogs in the ANAO's sample. Importers are also required to provide a report from a veterinarian advising DAFF that the dog had a satisfactory health check at the completion of the surveillance period. DAFF finalised the quarantine surveillance period of three dogs in the ANAO's sample without evidence of a satisfactory health check.

Systems supporting the national management of live animals imports

46. Current electronic systems¹⁷ provide information about imports, not the completion and outcomes of examinations. As a consequence, they do not support the analysis of data to inform compliance activity and highlight emerging issues. To collect and analyse data relating to importation and quarantine processes nationally, DAFF will need to develop an approach for recording examinations on a consistent basis. Extending the verification

¹⁷ Australian Quarantine and Inspection Service's Import Management System (AIMS) and Post-Entry Quarantine System (PEQS).

program to include checking the completeness and accuracy of the documentation supporting examinations and quarantine decisions will provide assurance regarding the integrity of the data being collected.

Post-entry quarantine arrangements (Chapter Four)

47. Most animals imported into Australia must spend time in quarantine isolation to ensure they are free of exotic pests and diseases. Animals ordered into quarantine must be transferred to the quarantine facility in a manner that maintains the integrity of quarantine. While in quarantine, an animal's health is monitored for potential quarantine risks and access to quarantined animals is restricted to minimise the potential risk of pests and diseases escaping quarantine. After the required period of quarantine isolation, consignments can be released if no pests or diseases of quarantine concern have been found. If pests or diseases are found, the consignment must be treated, detained for a further period, re-exported or destroyed.

48. Periods of post-entry quarantine are undertaken at either a quarantine station or a Quarantine Approved Premises (QAP). Of the 168 consignments in the ANAO's sample that were ordered into quarantine, 117 consignments were sent to quarantine stations and 51 consignments were sent to QAPs.

Managing animals during post-entry quarantine

49. Arrangements have been put in place at the quarantine stations and QAPs to manage the potential quarantine risks associated with imported live animals during post-entry quarantine. These arrangements cover transferring animals to quarantine facilities, controlling animal-specific quarantine risks and monitoring animal health.

50. DAFF has been revising its instructional material, including overarching manuals for the quarantine stations. Non-compliance with this new instructional material was identified through verification activities and a recent internal audit of the Byford and Spotswood quarantine stations.¹⁸ DAFF has taken steps to address the non-compliance issues that were identified through the internal audit.

¹⁸ The non-compliance issues identified through the internal audit related to: the weighing of animals on arrival at the quarantine station; the cleaning of crates; and the signing in and out of visitors. The internal audit also noted that DAFF had not provided sufficient or clear guidance on the management of quarantine risk to the third parties who were responsible for transporting animals to the Byford Quarantine Station.

Releasing animals from quarantine

51. If an officer is satisfied that the import conditions have been met, the animal can be released from quarantine. Of the 168 consignments ordered into quarantine, 131 had been released (including the eight consignments discussed in paragraph 43). For three of these consignments there was no documentation to indicate that the pre-release veterinarian examination had been completed. There were also 26 instances where the release from quarantine form was not completed as required by departmental work instructions. Further, in five instances where officers seized and destroyed fish, documentation was missing.

Managing Quarantine Approved Premises (Chapter Five)

52. Under the *Quarantine Act 1908*, DAFF approves and annually renews businesses, universities, research organisations, zoological parks and government agencies as Quarantine Approved Premises (QAPs) to perform quarantine activities. More than 2500 QAPs have been approved for various quarantine-related purposes. As of 30 September 2009, 148 QAPs (six per cent) were approved to house live animals including fish, zoo animals and laboratory animals during periods of quarantine isolation.

Monitoring QAP compliance

53. DAFF monitors QAPs to ensure that operators comply with the conditions of approval and the criteria relevant to each QAP class. Regional offices are responsible for undertaking regular audits and managing non-compliance. In April 2009, DAFF commenced a verification program that includes periodic desk-based reviews of documentation for selected QAP audits. DAFF advised that the verification program focuses on whether quarantine auditors understand work instructions and are applying them correctly.

54. For the 39 QAPs in the ANAO's sample, the ANAO reviewed 131 audits covering the period October 2004 to November 2009.¹⁹ For this sample, the ANAO found that:

- 11 per cent of QAPs were overdue for audits;

¹⁹ The majority (88 per cent) of these audits covered the period July 2007 to November 2009.

- 85 per cent of audit checklists did not adequately document audit findings;
- 69 per cent of audit reports were not completed;
- 11 per cent of identified non-compliance issues were overdue; and
- 62 per cent of identified non-compliance issues had not been addressed in a timely manner.

55. The department collects data on audit completion, but it is not reliable and is not analysed. Consequently, information about overdue audits is not being shared with other relevant areas across the department.

56. Audit checklists are designed to assist quarantine auditors. For the majority of audits reviewed by the ANAO, checklists did not clearly record which criteria had or had not been checked and audit reports were not completed.

57. Non-compliance matters identified in the ANAO's sample were not classified by severity or addressed in a timely manner. Officers had discretion as to how they tracked corrective action requests and the department had no oversight of this process. As a consequence, DAFF did not have adequate assurance at either the regional or national level that QAPs are being monitored effectively.

Verification program

58. As of 31 May 2010, DAFF had undertaken two rounds of verification reviews. These reviews included 18 audits for 13 QAPs that house ornamental finfish. Non-compliance with work instructions was identified for 17 of the 18 audits reviewed. The non-compliance issues related primarily to inadequate documentation. Feedback from the verification reviews was provided to each region. DAFF advised that the results and follow-up actions from verification reviews are reported to DAFF's management on a quarterly basis.

New policy for QAPs

59. In January 2010,²⁰ DAFF issued a new *Audit and Sanctions Policy* document. This policy outlined how QAP non-compliance would be classified—as minor, major or critical. In addition, the policy introduced

²⁰ The ANAO's sample did not include any audits undertaken since the introduction of the new policy.

variable audit rates for QAPs. The number of audits a QAP requires per year is to vary depending on the number and significance of the non-compliance issues identified during audits. Higher-risk QAPs are to be audited more frequently.

Summary of agency response

60. The ANAO provided a copy of the proposed report to DAFF. A response was received. A copy of the department's full response is included in Appendix One. The following summary comments were also provided:

The department agrees with the recommendations and findings of the ANAO audit report on the Management of Live Animal Imports. The recommendations and findings align with the priorities identified by the department. The department considers that the improvements recommended by the ANAO are already being addressed, or are part of the broader reforms recommended by the independent review of Australia's quarantine and biosecurity arrangements, *One Biosecurity: A Working Partnership*, chaired by Roger Beale AO.

The department welcomes the ANAO's acknowledgement that '*...DAFF has established a sound framework for managing quarantine risk...in relation to the importation of live animals. The department assesses quarantine risks and imposes import conditions pre-entry, at the border and post-entry to mitigate these risks.*' The department acknowledges the primary findings of the ANAO, which focus on the need to better document the activities of examining animals and their accompanying import documentation. The department agrees that improved records will assist the auditability of the system, and will take steps to implement the ANAO's recommendation.

The ANAO audit report also usefully highlights areas to improve the effectiveness of monitoring of quarantine approved premises (QAPs). The department agrees that better national tracking of QAP audit outcomes and data analysis is needed to inform quarantine decision making and notes that work is already underway to improve both processes and documentation for auditing QAPs. The ANAO also notes that initiatives implemented by the department in 2009-10, which the ANAO was unable to fully take into account, improve the assurance capability of QAP monitoring by the department.

Recommendations

Recommendation No. 1

Paragraph 3.33

To gain assurance that importers are complying with the import conditions required for consignments of live animals, the ANAO recommends the Department of Agriculture, Fisheries and Forestry:

- identify the information required to provide assurance that import conditions have been met;
- establish a mechanism for officers to record examinations consistently; and
- conduct regular quality assurance checks for a sample number of consignments as part of the verification program.

DAFF response: Agreed

Recommendation No. 2

Paragraph 5.35

To inform quarantine decisions and future compliance monitoring activities for Quarantine Approved Premises (QAPs), the ANAO recommends that the Department of Agriculture, Fisheries and Forestry establish a national approach to:

- track and record audit completion and results;
- track and record identified non-compliance issues; and
- analyse audit outcomes and non-compliance data on a regional and national basis.

DAFF response: Agreed

Audit Findings and Conclusions

1. Background and Context

This chapter discusses the Department of Agriculture, Fisheries and Forestry's processes for managing the importation of live animals. The audit's objective and scope are also outlined.

Introduction

1.1 Australia's quarantine and biosecurity system aims to minimise the risk of the entry, establishment or spread of exotic pests and diseases²¹ that have the potential to cause significant harm to people, animals, plants and other aspects of Australia's unique environment.²² Australia is presently free of many severe animal pests and diseases including:

- rabies—a fatal viral disease affecting mammals (including humans). Australia has been free of rabies since 1867;
- foot and mouth disease—a potentially fatal viral disease that can affect cattle, sheep, camels, deer, goats and pigs. There is no treatment or cure for foot and mouth disease. Australia has been free of foot and mouth disease since 1872;
- Newcastle disease and avian influenza—highly contagious viral diseases affecting the respiratory, digestive and nervous systems of birds. Australia has been free of avian influenza and virulent Newcastle disease since 1997 and 2002 respectively; and
- screw-worm fly—a fly that breeds in wounds on mammals (including humans) and causes extensive tissue damage. Death can occur if damaged tissue becomes infected.

1.2 Australia allows a range of live animals to be imported.²³ DAFF advised that between 1 July 2007 and 31 December 2009, 30 031 consignments of live

²¹ A pest includes any animal or plant that is considered to be a pest. A disease may be a micro-organism, a disease agent, an infectious agent or a parasite.

²² Beale, Fairbrother, Inglis and Trebeck, *One Biosecurity: A Working Partnership—The Independent Review of Australia's Quarantine and Biosecurity Arrangements Report to the Australian Government*, Commonwealth, September 2008, p.xiii.

²³ Section 52 of the *Quarantine Act 1908* defines an animal as 'the following that has been imported and not released from quarantine: a live animal or viable animal material and includes the ovum, semen and embryo of an animal but does not include any other biological product'.

animals were imported into Australia. These included: 22 584 consignments of dogs and cats; 5050 consignments of ornamental finfish; 1263 consignments of animal reproductive material (semen and embryos); 16 consignments of hatching eggs; 900 consignments of laboratory animals; and 30 consignments of zoo animals. The remaining 188 consignments included horses, pigeons and alpacas.²⁴

1.3 The importation of live animals exposes Australia to potential outbreaks of exotic pests and diseases. Animals, and the packaging that animals arrive in, can carry pests and diseases. In the case of non-permitted species, the animal itself is considered a pest. Outbreaks of exotic diseases and incursions of pests are not common in Australia, but when they do occur, such as the equine influenza outbreak in August 2007, they are disruptive and costly.

Administrative arrangements for live animals

1.4 The Department of Agriculture, Fisheries and Forestry's (DAFF) Biosecurity Services Group is responsible for managing Australia's quarantine and biosecurity system. The Biosecurity Services Group was established on 1 July 2009 when the functions and responsibilities of Australian Quarantine and Inspection Service, Biosecurity Australia and DAFF's Product Integrity, Animal and Plant Health division, and the Quarantine and Biosecurity Policy Unit were integrated.²⁵

1.5 Prior to 1 July 2009, the Australian Quarantine and Inspection Service (AQIS) was responsible for managing the quarantine risks presented by goods arriving at the border, including live animals. Biosecurity Australia was responsible for assessing quarantine risks and providing advice on the effective management of these risks.

1.6 Under the Biosecurity Services Group structure, quarantine policy is developed nationally with regional offices managing quarantine operations at the border. The national program areas develop instructional material and provide operational advice. As shown in Figure 1.1, there are five administrative regions across Australia: Northern, North East,

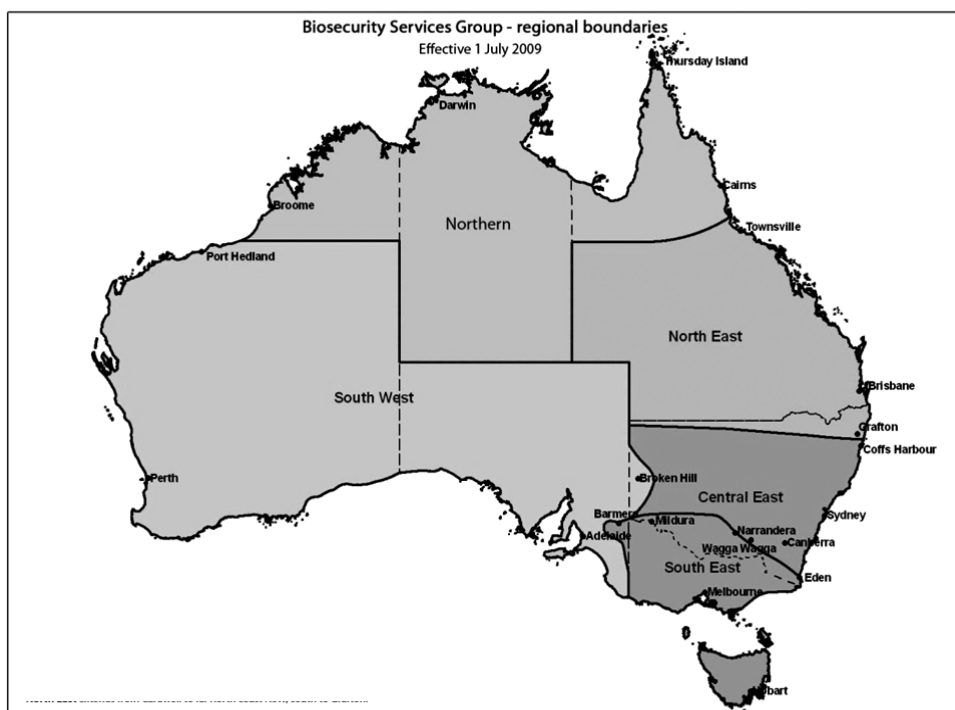
²⁴ The breakdown of consignments is shown in Table 1.1.

²⁵ This restructure was pre-empted by the Beale review, which is discussed in more detail in paragraph 1.23.

Central East, South East and South West. Within these regions, there are 10 regional offices: Adelaide, Brisbane, Cairns, Darwin, Hobart, Mackay, Melbourne, Perth, Sydney and Townsville.

Figure 1.1

Regional boundaries

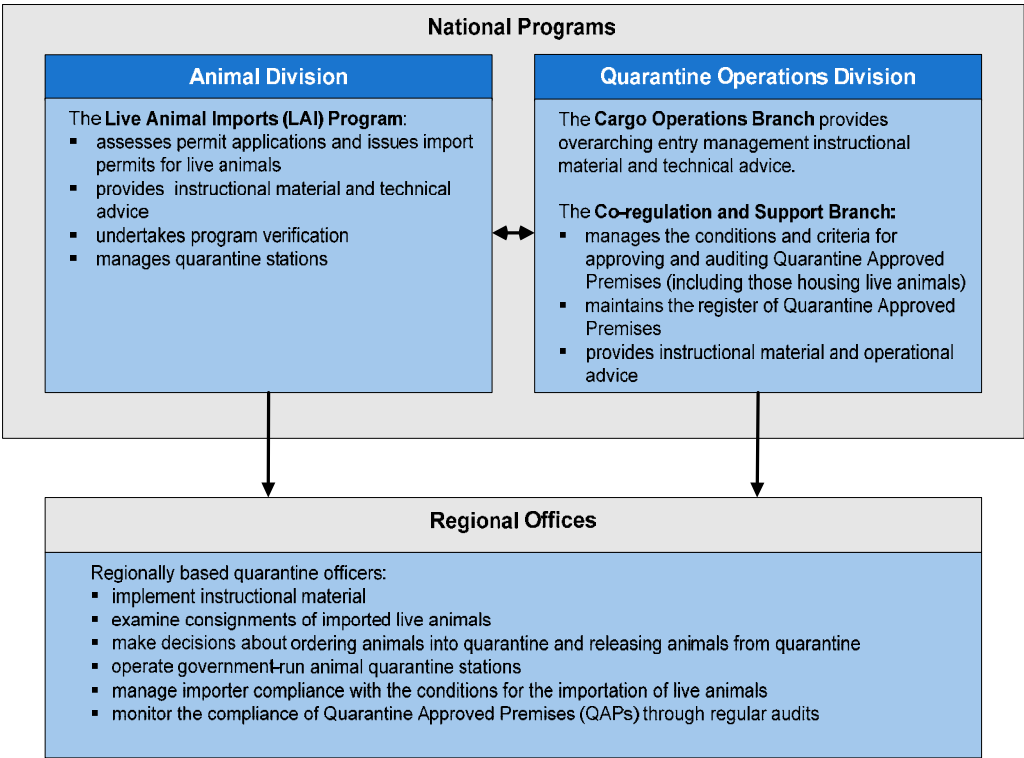


Source: Department of Agriculture, Fisheries and Forestry.

1.7 The importation of live animals involves several areas in the Biosecurity Services Group. The Animal Division is responsible for assessing animal risks and managing animal health, importations and exportations. The Live Animal Imports (LAI) Program is responsible for managing the importation of live animals nationally. The LAI Program works closely with the Quarantine Operations Division. Within this division, the Cargo Operations Branch is responsible for managing the entry of live animals at the border, and the Co-regulation and Support Branch is responsible for managing quarantine premises run by third parties. Figure 1.2 outlines these relationships and the roles and responsibilities of each area and the responsibilities of the regional offices.

Figure 1.2

National and regional roles and responsibilities for the importation of live animals



Source: ANAO analysis of DAFF information.

Approach to managing quarantine risk

1.8 DAFF determines, through a risk assessment, the level of quarantine risk presented by allowing live animals to be imported.²⁶ The assessment takes into account the country of export and the purpose of importation. Importation will be possible if the risk that the animal is carrying an exotic pest or disease is acceptably low or the risk can be managed through import conditions.

1.9 Conditions can be applied: prior to importation to minimise the likelihood that quarantinable pests and diseases will be imported; on arrival at

²⁶ The Australian Government will allow animals to be imported only if the level of quarantine risk is very low or zero. The level of quarantine risk refers to the probability of a disease or pest being introduced, established or spread; the probability of the disease or pest causing harm to human beings, animals, plants, the environment or the economy; and the probable extent of the harm.

the border; and/or post-entry. Conditions include, for example, periods of quarantine isolation, testing for disease and treatments for pests such as ticks. For example, for dogs, import conditions differ depending on the exporting country and why the dog is being imported. Countries/territories that import dogs and cats have been categorised (from one to six) based on the country's control over rabies. Dogs from countries in:

- category one can be imported without post-entry quarantine;
- categories two to five require a period of post-entry quarantine; and
- category six cannot be imported.²⁷

1.10 DAFF allows disability assistance dogs, imported from countries in categories two and four, to be released on arrival if the handler: meets additional pre-export requirements; provides proof of the dog's accreditation; and agrees to the conditions of quarantine surveillance.

Preparing for importation

1.11 Potential importers can access information about import conditions from DAFF's website or by contacting the LAI Program area by telephone, fax or email. DAFF provides information packs that outline the steps involved in importing specific animals and the application forms for an import permit.²⁸ Permit applications are assessed by DAFF and recommendations made to the Director of Quarantine or delegate to issue a permit (or not).

1.12 Between 1 July 2008 and 30 June 2009, DAFF issued 8195 import permits for live animals. Approximately 90 per cent of permits issued to importers of live animals are for dogs and cats. These permits allow one animal to be imported once. Other permits, such as those issued to importers of live fish, can be valid for one year and allow multiple consignments of unlimited numbers of permitted fish species to be imported.

Entry management

1.13 On arrival at the border, consignments and the accompanying documentation—a permit (if applicable) and a veterinary certificate from the

²⁷ Appendix Two provides a full list of countries and their categorisation for exporting live dogs to Australia.

²⁸ With the exception of dogs and cats from New Zealand, importation is prohibited by the *Quarantine Proclamation 1998* unless an import permit has been granted.

exporting country confirming that pre-export conditions have been met—are examined by quarantine officers.

1.14 Consignments that arrive at the border are either ordered into quarantine or released to the importer. A consignment is ordered into quarantine when post-entry quarantine is required by the import conditions or when it is necessary to detain, treat, re-export or destroy a consignment to manage identified quarantine risks. A consignment will be released if all import conditions are met. Officers can apply conditions of quarantine surveillance when releasing the animal that, for example, restrict the animal's contact with other animals and require the importer to provide a veterinary report on the animal's health after a specified period of time.

1.15 DAFF provides instructional material for officers responsible for managing the entry of live animals. This material outlines the processes to be followed and the documentation to be completed by quarantine officers.

Post-entry quarantine facilities

1.16 A period of post-entry quarantine allows DAFF to monitor an animal's health and identify any disease concerns prior to the animal's release into Australia.²⁹ For example, in April 2010, DAFF identified Newcastle disease in a consignment of pigeons from the United States of America that were in quarantine isolation in Victoria.

1.17 Most animals imported into Australia must spend time in isolation at a quarantine facility, which is either a quarantine station managed by DAFF or a Quarantine Approved Premises (QAP) managed by a private operator. QAPs are approved by the Co-regulation and Support Branch and the QAP's compliance against national standards is regularly assessed.

1.18 Each quarantine facility is designed to securely accommodate particular animals and to contain exotic diseases that may be present. For example, facilities that house hatching eggs operate on an 'all-in-all-out' basis to manage avian diseases, which can be transmitted through contaminated feed or water or carried by wind. These facilities are designed to be biologically secure. Once 'locked down' in preparation for the arrival of a consignment of eggs, all

²⁹ The period of post-entry quarantine is sufficient for signs of disease to become apparent if the animal has been exposed to a quarantinable disease prior to exportation or during transport to Australia.

water, air, waste, food, people and other goods exiting the facility are to be managed.³⁰ Departmental procedures require satisfactory results from tests conducted in Australia and a second veterinary certificate from the exporting country before chicks can be released.

1.19 Quarantine stations for dogs and cats provide secure kennels and pens as diseases of dogs and cats can be transmitted through contact.³¹ Access to the facility is restricted and dogs and cats cannot move freely around the quarantine station.

Reviews into quarantine arrangements

1.20 In recent years, there have been two major reviews of Australia's quarantine arrangements:

- the Callinan inquiry into the cause of the outbreak of equine influenza; and
- the Beale review of Australia's quarantine and biosecurity arrangements.

The Callinan inquiry into the cause of the outbreak of equine influenza

1.21 As previously noted, in August 2007, there was an outbreak of the equine influenza virus that the Callinan inquiry concluded had most likely escaped from the Eastern Creek Quarantine Station, which is managed by DAFF. Live horses are imported for racing, breeding and recreational purposes, and generally require a period of post-entry quarantine. Horses are quarantined on an 'all-in-all-out' basis and regularly accessed during quarantine by grooms, farriers and veterinarians. The Australian Government spent more than \$342 million on the eradication of the virus and the provision of financial assistance to affected individuals, organisations and businesses.

1.22 The inquiry into the cause of the outbreak was led by the Honourable Ian Callinan AC and found that the virus had most likely escaped due to systemic organisational weaknesses in the then Australian Quarantine

³⁰ Entry is possible, but exit is restricted.

³¹ Up to two dogs or up to two cats imported by the same importer may be housed in the same kennel or pen. However, both animals must meet the import conditions before either can be released.

and Inspection Service's approach to biosecurity and quarantine processes. The April 2008 inquiry report, *Equine Influenza: the August 2007 outbreak in Australia*, made 38 recommendations. These included establishing a position of Inspector General in charge of horse importation, revising the *Quarantine Act 1908*, and reviewing operational procedures and horse importation risk assessments. The Government agreed to all recommendations in June 2008.

The Beale review of Australia's quarantine and biosecurity arrangements

1.23 In February 2008, the Minister for Agriculture, Fisheries and Forestry appointed an independent panel, chaired by Roger Beale AO, to conduct a comprehensive review of Australia's quarantine and biosecurity systems. The panel's September 2008 report, *One Biosecurity: A Working Partnership—The Independent Review of Australia's Quarantine and Biosecurity Arrangements Report to the Australian Government*, made 84 recommendations aimed at extensively reshaping the framework and delivery of Australia's quarantine and biosecurity systems. The recommendations included reviewing the *Quarantine Act 1908*, DAFF's information technology systems and quarantine facilities (including quarantine stations). The review also recommended restructuring the areas responsible for biosecurity functions and moving to a risk-return approach for managing biosecurity and quarantine. The recommendations were agreed to in principle by the Government in December 2008, subject to Budget processes.

DAFF's response to the reviews

1.24 At the time of the audit, DAFF was taking steps to implement the recommendations made by the independent reviews. DAFF advised that because the Callinan inquiry had clearly identified horses as a high biosecurity risk, additional resources were initially allocated to improving the biosecurity and quarantine processes for horses. The Government has engaged Professor Peter Shergold AC to provide the Minister for Agriculture, Fisheries and Forestry with assurance that the recommendations from the Callinan inquiry are being effectively implemented. Professor Shergold provided his fourth report to the Minister in March 2010, and he is scheduled to provide oversight until June 2010.

1.25 The findings of the reviews were also applicable across multiple commodities (including live animals). DAFF advised that as the work relating to the implementation of the Callinan inquiry recommendations nears

completion, resources will be moved to support work that is already underway to improve biosecurity and quarantine processes for other live animal species. In addition, the department is:

- drafting new biosecurity legislation;
- redesigning information technology systems;
- developing the methodology for a risk–return approach to biosecurity activities; and
- reviewing the status of quarantine stations and their future management arrangements.

Audit objective, scope and methodology

1.26 The audit objective was to examine how effectively the Department of Agriculture, Fisheries and Forestry (DAFF) manages the importation of live animals into Australia. Particular emphasis was given to the:

- assessment and approval of permit applications;
- management of quarantine risk associated with the importation of live animals;
- arrangements for post-entry quarantine; and
- approval and auditing of Quarantine Approved Premises.

1.27 The audit did not examine the development of quarantine policy, the assessment of import risks or the detection of illegally imported live animals.

Audit methodology

1.28 To assess the effectiveness of DAFF's importation processes, the ANAO reviewed a sample of 207 consignments imported between 1 October 2007 and 30 September 2009.³² The consignments included dogs, cats, fish, hatching eggs, reproductive material and animals imported by zoos and laboratories. The sample covered consignments received during the following periods: two consignments in 2007; 14 consignments in 2008; and 191 consignments in 2009.

³² The ANAO requested documentation for a total of 208 consignments, but DAFF was unable to locate any documentation for one disability assistance dog consignment.

1.29 The ANAO's sample (outlined on the next page in Table 1.1) covered:

- the live animals most commonly and regularly imported; and
- a range of importers—one-off importers of pet dogs and cats and commercial importers of laboratory animals and fish.

1.30 The ANAO's sample excluded bees, military dogs, camelids and pigeons as these groups represent a very small proportion of the live animals that are imported into Australia. Horses were also excluded as the importation process was examined in the Callinan inquiry.

Table 1.1

ANAO sample coverage and the number of animals imported between 1 July 2007 and 31 December 2009

Animal	Number of consignments imported into Australia			Numbers in the ANAO's Sample	
	2007-08	2008-09	July to December 2009	Consignments	Animals
Ornamental finfish⁽¹⁾	2033	2059	958	23	217 401
Dogs	5776	6016	2620	66	71
Disability assistance dogs	9	12	9	16	16
Cats	3385	3418	1339	59	60
Zoo animals	8	13	9	6	27
Laboratory animals	360	377	163	15	214
Hatching eggs	5	6	5	6	102 280
Animal reproductive material	453	361	449	16	30 506 (doses)
TOTAL	12 029	12 262	5552	207	350 575

Note 1: Bags of fish are visually inspected on arrival to ensure the number of fish match the invoice. If the density in a bag impedes visual inspection, the fish are to be inspected at the QAP within 48 hours.

Source: DAFF data.

1.31 The ANAO reviewed available instructional material and observed quarantine processes at airports, QAPs and quarantine stations in Sydney, Melbourne and Adelaide. Quarantine officers and inspectors were interviewed and documentation held by national and regional offices relating to the 207 consignments of live animals in the ANAO's sample was reviewed.³³

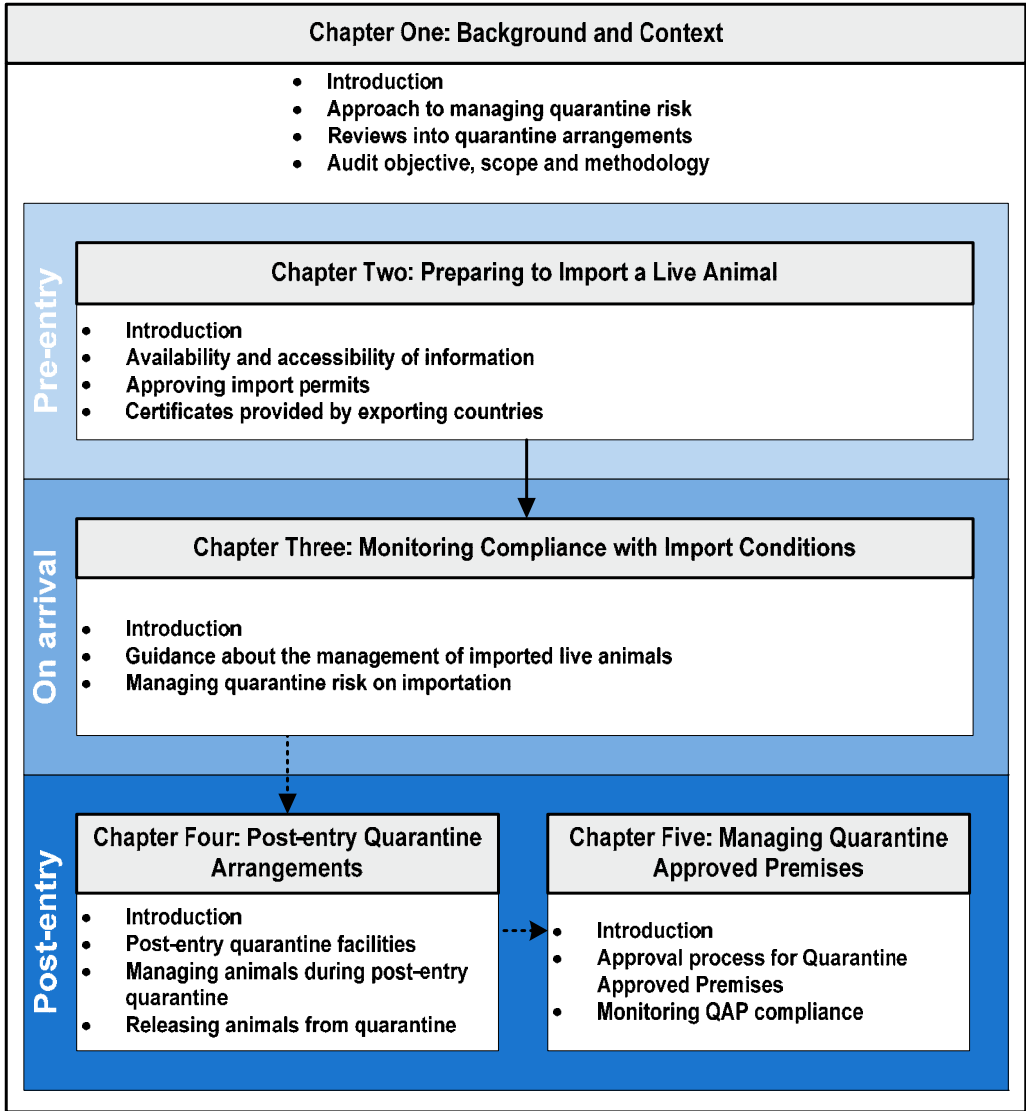
1.32 To examine the Co-regulation and Support Branch's approval and ongoing management of QAPs, the ANAO reviewed documentation for 131 audits conducted at 39 QAPs between 27 October 2004 and 9 November 2009. The audits covered during this period were: two in 2004-05; three in 2005-06; 11 in 2006-07; 28 in 2007-08; 65 in 2008-09; and 22 in the period 1 July to 9 November 2009. The ANAO visited 15 QAPs and observed audits being undertaken at eight of these premises.

1.33 The audit was conducted in accordance with ANAO auditing standards. The audit cost \$360 000.

1.34 The structure of the report is outlined in Figure 1.3.

³³ Documentation for the ANAO's sample was held on electronic systems and in hard copy. Cargo arriving at the border is tracked by DAFF using the Australian Quarantine and Inspection Service's Import Management System (AIMS). Animals held at DAFF-run quarantine stations are tracked with the Post Entry Quarantine System (PEQS).

Figure 1.3
Report Structure



Source: ANAO.

2. Preparing to Import a Live Animal

This chapter discusses the steps importers are to take before importing a live animal into Australia.

Introduction

2.1 Importers are required to comply with all conditions applicable to the animal being imported.³⁴ In all cases, compliance requires importers to take steps before importing the animal to Australia. The ANAO reviewed the:

- availability and accessibility of information for potential importers;
- approval of import permits; and
- arrangements underpinning the veterinary certificates provided by exporting governments.

Availability and accessibility of information

2.2 Potential importers have access to sufficient information to enable them to understand importation requirements and the permit application process. Information about import conditions is available on DAFF's website or by contacting the LAI Program area by telephone, fax or email. The Import Conditions (ICON) database can also be searched by potential importers for advice about whether (or not) a live animal can be imported into Australia and the import conditions that apply. If importation is restricted or not allowed, importers are directed to contact DAFF if they require further information.

2.3 DAFF provides information packs for importing specific animals and application forms for an import permit. For example, information packs for dogs and cats are tailored to the five categories of countries approved to export to Australia.³⁵ Importers of disability assistance dogs have also been provided with information tailored to their circumstances.

³⁴ Import conditions for live animals are developed from a risk assessment.

³⁵ Appendix Two shows the countries that have been approved to export dogs and cats to Australia.

Approving import permits

2.4 Generally, an importer requires a permit to import a live animal.³⁶ To obtain a permit, an application form must be submitted to the LAI Program area for assessment. DAFF officers assess permit applications and make recommendations to the Director of Quarantine or a delegate to issue the permit (or not). To issue a permit, the Director of Quarantine (or delegate) must be satisfied that allowing importation would not expose Australia to an unacceptably high level of quarantine risk.³⁷ The assessment and decision-making process is supported by instructional material and checklists.

2.5 Permits are generated from the ICON Permits database. The conditions that importers were to comply with were clearly documented.³⁸ Each permit has a unique number and specifies:

- what is permitted;
- how many consignments are allowed;
- the period the permit is valid for; and
- the applicable import conditions.

2.6 The outcomes of 8244 permit applications received between 1 July 2008 and 30 June 2009 for the live animals in the ANAO's sample were reviewed. Of these, 72 applications were withdrawn as the permit was no longer required. For the remaining 8172 applications, the delegate was satisfied in each case that a permit could be issued.

Certificates provided by exporting countries

2.7 Each consignment in the ANAO's sample was to be certified as having met pre-export conditions.³⁹ The certifying authority is usually the exporting

³⁶ Section 37(2 and 3) of the *Quarantine Proclamation 1998* allows dogs and cats from New Zealand to be imported without a permit. The conditions of importation are outlined in the relevant section.

³⁷ If the quarantine risk increases after a permit has been issued, the permit can be varied, revoked or suspended.

³⁸ The import conditions for the animals, hatching eggs and reproductive material in the ANAO's sample are outlined in Appendix Three.

³⁹ Certificates provided for consignments in the ANAO's sample are discussed in Chapter Three.

government's veterinary authority. For animals in the ANAO's sample, the certificate covered, for example, that the:

- animal was in good health, had undergone appropriate testing with satisfactory results and pre-entry preparation requirements had been met (including isolation if required);
- facilities responsible for pre-export preparation of live animals exported to Australia had been approved by the government of the exporting country against DAFF's requirements. For example, dogs and cats being imported from South Africa (a category five country) must undergo pre-entry quarantine isolation at an approved facility. In some instances, DAFF requires reproductive material to be collected from a donor animal that has been held under quarantine restriction in an approved facility; and
- exporting country's pest and disease status had not changed.

2.8 Certificates are worded so certification cannot be provided if any of the requirements cannot be met. DAFF advised that certification requirements, such as testing and treatments, are reviewed when it becomes aware of changes in risk, including emerging diseases or changes in scientific knowledge.

Approval of certifying authorities

2.9 For each group of live animals imported, the certifying authority must be approved by DAFF. Approval is based on DAFF's assessment of the certifying authority's ability to provide informed and reliable certification that Australia's quarantine requirements have been met. The assessment takes into account the:

- country's animal health status;
- effectiveness of veterinary services and other relevant certifying authorities;
- legislative controls over animal health, including quarantine policies and practices;

- standard of reporting to the World Organisation for Animal Health (OIE) of major contagious disease outbreaks⁴⁰;
- effectiveness of veterinary laboratory services, including compliance with relevant international standards; and
- effectiveness of systems that control certification of products intended for export to Australia.

2.10 Countries with a history of compliance with Australia's quarantine conditions may be approved by DAFF to export additional types of live animals without a formal assessment being conducted.

Reviewing certifying authorities

2.11 The department advised that reviews of competent authorities are conducted on a risk basis. Members of the OIE are to report changes in their pest and disease status, and DAFF monitors these changes through the OIE's framework. The department also obtains information through its agricultural counsellors (stationed at key diplomatic posts) and from informal sources such as media reports. If necessary, on-site inspections are conducted.

2.12 DAFF advised that, prior to the Callinan inquiry, on-site inspections of pre-export quarantine facilities in exporting countries were not always conducted.⁴¹ Inspections, then, were viewed as being unnecessary as DAFF was able to satisfy itself about the exporting country's systems (through OIE systems) and there were officers who could validate practices if required. Following the Callinan inquiry, on-site inspections are being conducted, primarily for horse export facilities. DAFF advised that arrangements for importing ornamental fish were also identified for review. On-site reviews were conducted of certifying authorities in Singapore and Malaysia in early 2010. The outcomes of these reviews had not been finalised at the time of the audit.

⁴⁰ The Office International des Epizooties (OIE) was established by international agreement in 1924. In May 2003 the OIE became the World Organisation for Animal Health but kept its historical acronym OIE. In total there are 175 member countries and territories.

⁴¹ DAFF advised that on-site assessments have been conducted of the pre-export quarantine facilities for: dogs and cats in the Republic of South Africa; camelids in Peru and Chile; and fish.

Managing non-compliant certificates

2.13 Non-compliance by exporting countries is reported by the regions and dealt with on an individual consignment basis by the LAI Program.⁴² DAFF did not collate these reports and analyse compliance trends by exporting countries until February 2009 when the LAI Program began its Non-compliance Project. The department's current systems do not support the collection or analysis of this type of information and not all examinations of certificates were documented.

2.14 Regional officers are to record non-compliance on a checklist when reviewing certificates for dogs and cats imported from countries in categories two to five. As of February 2009, officers were required to report instances of non-compliant veterinary certificates to the LAI Program so data could be collated and analysed as part of the project.⁴³ Data had been analysed for the periods February to May 2009 and July 2009 to February 2010.⁴⁴ For these periods, 5530 dogs and cats arrived and their certificates were checked. DAFF advised that for 5530 arrivals, 824 (14 per cent) non-compliance issues had been identified. The identified issues ranged from minor administrative errors to major non-compliance that had resulted in the animal being exported. The LAI Program advised that the data will be used to inform risk assessments and conduct reviews of exporting countries' systems. DAFF also advised that feedback about repeated non-compliance has been provided to one exporting country.

2.15 The project was extended to certificates for imported live fish. As there was no way of capturing information about the compliance of certificates from exporting countries, the LAI Program developed a new checklist to be used by quarantine officers. The new form was piloted in two regions in July 2009 and extended nationally in August 2009. With the inclusion of fish imports, the non-compliance project now covers the majority of live animals imported into Australia and the majority of individual consignments. DAFF advised that it is yet to finalise how to analyse and report on the data for fish consignments.

⁴² DAFF's management of non-compliance with entry requirements is discussed further in paragraph 3.22,

⁴³ The LAI Program collects this data on a spreadsheet.

⁴⁴ The department did not analyse data for June 2009.

Conclusion

2.16 Appropriately applied pre-export conditions assist DAFF to minimise the risk of quarantinable pest and diseases arriving at the border. Although DAFF relies on the assurances provided by exporting governments that pre-export conditions have been met, the onus is on the department to monitor and manage non-compliance. Prior to commencing the veterinary certificate non-compliance project, DAFF had not validated officers' concerns about non-compliant veterinary certificates from exporting countries. The project has allowed the department to assess, on a national basis, the extent of veterinary certificate non-compliance. This analysis will support the risk assessments and reviews of exporting countries' systems. Although DAFF is collecting and recording non-compliance data centrally (on a spreadsheet), it is not an efficient process and highlights the limitations of DAFF's systems. The broader issue of data collection and management is discussed in Chapter Three.

3. Monitoring Compliance with Import Conditions

This chapter examines the systems and processes for monitoring compliance with the import conditions for live animals.

Introduction

3.1 Appropriately applied import conditions limit the likelihood that exotic pests and diseases will enter Australia.⁴⁵ Quarantine officers in the regions are responsible for ensuring that importers comply with these conditions.

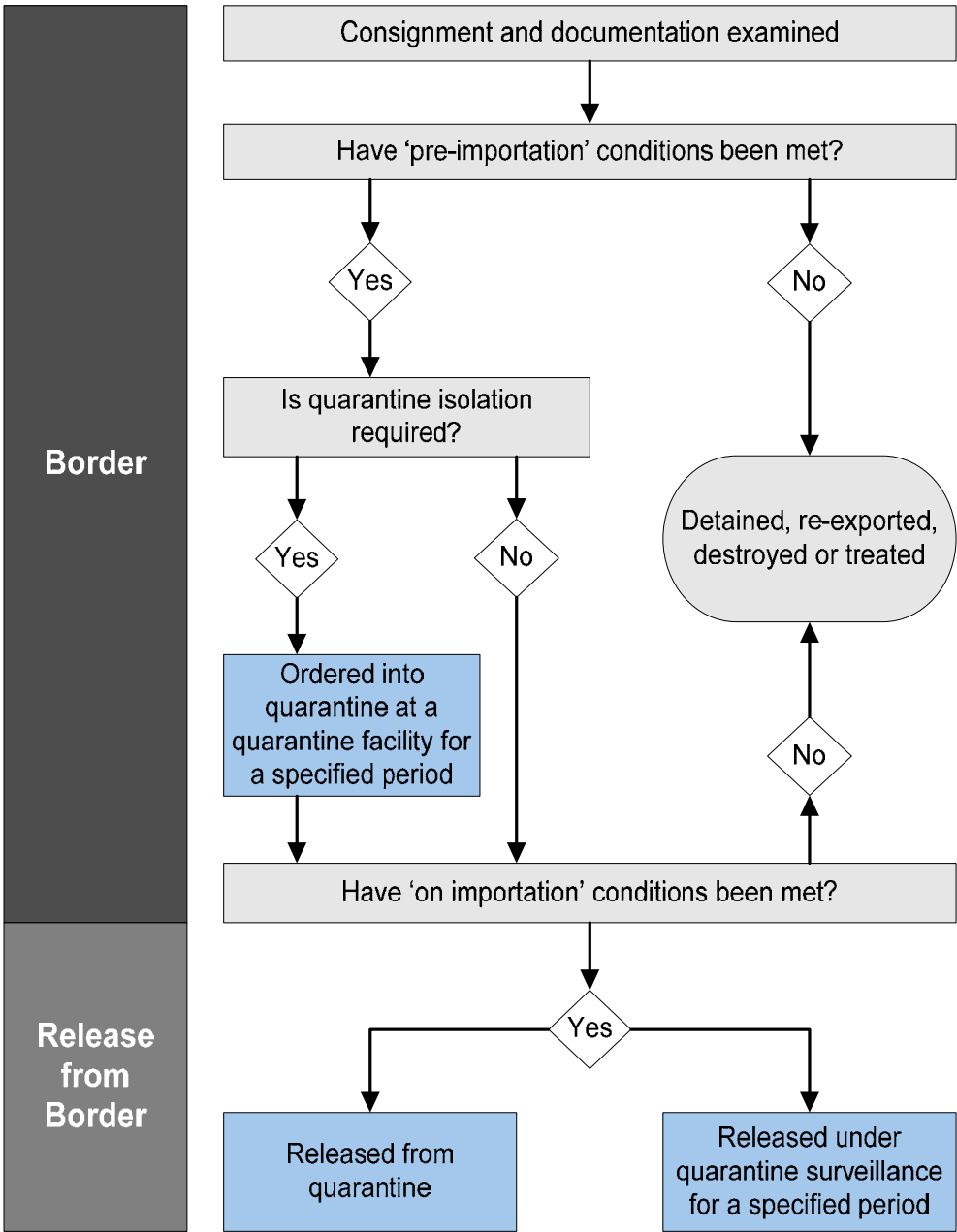
3.2 When a consignment arrives at the border, the importer is required to present the import permit (if applicable) and the veterinary certificate from the exporting country for examination and any other supporting documentation. Officers examine the documentation and the consignment and then either order the consignment into quarantine or release the consignment to the importer.

3.3 The import conditions for a live animal generally require a period of post-entry quarantine isolation to manage any potential quarantine risks. A consignment is ordered into quarantine if required by the import conditions or when it is necessary to detain, treat, re-export or destroy a consignment to manage an identified quarantine risk. Consignments can be released only if officers are satisfied that any potential quarantine risks have been managed. Figure 3.1 provides an overview of the entry management process for live animals.

⁴⁵ As previously noted in paragraph 1.8, import conditions for live animals are developed following a risk assessment undertaken by the Animal Biosecurity Branch.

Figure 3.1

Overview of the entry management process for live animals



Source: ANAO analysis of DAFF data.

3.4 The ANAO examined DAFF's management of 207 consignments (as outlined in Table 3.1) of live animals imported into Australia during the period 1 October 2007 to 30 September 2009.⁴⁶ All consignments required a valid veterinary certificate(s) from the exporting country and an examination to confirm that the consignment contained only permitted species and was covered by the veterinary certificate. A valid permit was also required for 195 consignments. The remaining 12 consignments were dogs and cats from New Zealand, which do not require an import permit.

Table 3.1

Consignments reviewed by the ANAO

Consignment	Number of consignments	Number of animals
Ornamental finfish	23	217 401
Dogs	66	71
Disability assistance dogs	16	16
Cats	59	60
Animals imported by zoos	6	27
Animals imported by laboratories	15	214
Hatching eggs	6	102 280
Reproductive material (doses)	16	30 506
TOTAL	207	350 575

3.5 To assess how effectively DAFF managed importers' compliance, the ANAO reviewed the:

- guidance provided to officers;
- management of quarantine risk on importation; and
- national systems supporting the importation of live animals.

⁴⁶ The sample covered consignments received during the following periods: two consignments in 2007; 14 consignments in 2008; and 191 consignments in 2009.

Guidance about the management of imported live animals

3.6 The Quarantine Operations Division is responsible for managing the entry of imported cargo (including live animals) into Australia. The division provides instructional material about the legal and administrative framework for quarantine management and the recording of information about imports on the Australian Quarantine and Inspection Service's Import Management System (AIMS). The LAI Program issues guidance on the specific processes to be followed for live animal imports. This guidance includes the information that should be captured in the Post-Entry Quarantine System (PEQS) about animals quarantined at government-run quarantine stations.

Updates to guidance relating to live animals

3.7 Following the Callinan inquiry, DAFF's 2008–09 and 2009–10 Business Plans gave priority to the review and development of national instructional material, on-the-job training and a verification program to assess whether the instructions were comprehensive and understood. The instructional materials for dogs and cats, fish, hatching eggs and reproductive material were identified as key priorities because of the high volume of imports and quarantine risks associated with these imports.

3.8 Between December 2008 and July 2009, DAFF updated instructional material for the clearance of dogs and cats, reproductive material, fish and animals imported by zoos and laboratories.⁴⁷ In December 2009, new instructional material was released for the clearance of hatching eggs.

Training and verification activities

3.9 Regional officers are trained on the job and tested by regional supervisors to ensure they have understood new instructional material and processes. Regional supervisors advised that they verified the understanding of officers by checking AIMS records and conducting quizzes.

3.10 Verification activities are intended to provide assurance that instructional material is appropriate and officers are interpreting the guidance

⁴⁷ Instructional material for imported dogs and cats included separate guidance on the following areas: dogs and cats from New Zealand (category one); dogs and cats from countries in categories two to five; and disability assistance dogs.

as intended. Verification plans were prepared for 2008–09 and 2009–10. The 2009–10 plan relied on the ANAO’s audit to verify quarantine operations.

3.11 In 2008–09, the LAI Program’s verification activities involved reviews of work instructions, visits to regional offices by officers from the LAI Program and the Animal Biosecurity Branch and mapping of the importation processes for dogs and cats, fish, and genetic material. DAFF advised that information gathered through these processes was used to update the instructional material. Further, officers from the LAI Program verified the implementation of quarantine processes for imported fish in New South Wales, Queensland, Western Australia and Victoria in March 2009. A report was prepared that identified areas where clarification would improve the instructional material. In addition, an internal audit examining officers’ compliance with instructional material was undertaken at the Byford and Spotswood quarantine stations.⁴⁸

Conclusion

3.12 Instructional material has been revised to provide better guidance to officers, taking into account information gathered through verification activities. The verification processes conducted to date have not included reviewing the completeness and accuracy of the documentation for imported consignments. Including a quality assurance check of the documentation for a sample of consignments would provide greater assurance that instructional material had been not only understood, but also properly implemented.

Managing quarantine risk on importation

3.13 Officers are to examine the permit, veterinary certificate and consignment to establish that the animal(s) is allowed to be imported and that no material of quarantine concern is present.⁴⁹ For example, consignments of:

- fish are to be unpacked and inspected, and the containers are to be examined. Each fish must be healthy and a permitted species.⁵⁰ Material

⁴⁸ This internal audit is discussed further in Chapter Four.

⁴⁹ Where live animals are to be ordered into post-entry quarantine at a DAFF-run quarantine station, the examinations may take place after the animal has been transferred.

⁵⁰ Permitted species are identified on the import permit and the list of permitted species is on the ICON database.

of quarantine concern, such as snails or aquatic plants, must not be present; and

- hatching eggs are not unpacked until inside the quarantine facility. The packaging is examined for damage, broken eggs, straw and manure.

3.14 Officers must order the consignment into quarantine if the import conditions require the consignment to undergo quarantine or if the import conditions have not been met. Alternatively, the consignment can be released if the import conditions have been met. For the 207 consignments in the ANAO's sample, the veterinary certificate and import permit were cited by the ANAO and the decisions made by quarantine officers have been summarised in Table 3.2.

Table 3.2

Directions on importation for animals in the ANAO's sample

Direction	ANAO's sample
Ordered into quarantine isolation	6 consignments of zoo animal(s) 6 consignments of hatching eggs 15 consignments of laboratory animals 23 consignments of fish 113 consignments of dogs and cats 3 consignments of reproductive material 2 disability assistance dogs
Released without quarantine isolation	12 consignments of dogs and cats from New Zealand 12 consignments of reproductive material
Released without quarantine isolation with conditions of quarantine surveillance	14 disability assistance dogs 1 consignment of reproductive material

Source: ANAO analysis of DAFF documentation.

3.15 The ANAO reviewed documentation that supported the:

- examination of consignments, permits and veterinary certificates; and
- decisions made by officers to either order consignments into quarantine isolation or release the consignments.

Documenting on-arrival examinations

3.16 For the animals in the ANAO's sample, DAFF specified how officers were to record their examinations for:

- dogs and cats from countries in categories two to five. Instructional material released in September 2008 included a checklist for examining veterinary certificates and permits and a veterinary examination report form for recording on-arrival examinations. The checklist and report form applied to all 113 consignments reviewed;
- disability assistance dogs. The revised instructional material (released July 2009) included a checklist covering the examination of the dog, the veterinary certificate and the permit. For the 16 consignments reviewed, the new checklist applied to one consignment;
- fish. A checklist for auditing the veterinary certificate and the permit was piloted by two regions in July 2009 and released nationally in August 2009. For 23 fish consignments reviewed, the checklist applied to two consignments; and
- hatching eggs. The permit included a declaration form for supervising veterinary officers to confirm that all import conditions had been met. The declaration applied to the six consignments reviewed by the ANAO.

3.17 Instructional material for dogs and cats from New Zealand, reproductive material and animals imported by zoos and laboratories did not include instructions about recording the outcomes of the examination process. In the absence of such instructions, officers made notes in the comments field of some AIMS records or kept discretionary hard copy records.⁵¹ Discretionary documentation of examinations included ticks on certificates, personal checklists, handwritten comments and notes in personal diaries.

3.18 Checklists are a practical tool for documenting examinations when the import conditions are consistent and the animal species is imported regularly. For example, a checklist may be practical for dogs and cats imported from New Zealand or for mice imported by laboratories. However, a checklist may

⁵¹ Notes made in the comments field of the import's AIMS record cannot be found through electronic searches.

not be appropriate for some live animal groups, such as zoo animals, as it would be too broad or too complex.

Examinations of consignments and import documentation

3.19 The documentation for each of the 207 consignments in the ANAO's sample was held in a bundle rather than on a formal file and did not necessarily include all documentation that should have been kept. Of the 207 consignments, 206 also had an electronic record.

3.20 For the ANAO's sample, 122 consignments should have had a checklist and/or form to document examinations. Of these, there were:

- one missing and five incomplete veterinary certificate checklists for dogs and cats from countries in categories two to five;
- 35 missing and six incomplete on-arrival veterinary examination reports for dogs and cats from countries in categories two to five; and
- five missing declaration forms for hatching eggs.

3.21 For the remaining 85 consignments, DAFF did not provide instructions about recording examinations. For these consignments, examinations had been recorded on a discretionary basis or no documentation was available to demonstrate that an officer had examined the consignment and confirmed that it was compliant with all import conditions.

Order into quarantine

3.22 Of the 207 consignments in the ANAO's sample, 168 were ordered into quarantine isolation at either a quarantine station or a Quarantine Approved Premises. Post-entry quarantine was a condition of the import permit for 160 consignments. The other eight consignments were ordered into quarantine because import conditions had not been met.⁵²

3.23 Of the 168 consignments, 32 did not have a record of the Order into Quarantine being issued.⁵³ It is important to note that, for the animals in the

⁵² The operations of quarantine stations and Quarantine Approved Premises are discussed in Chapters Four and Five.

⁵³ These 32 consignments comprised: 23 dogs and cats (from categories two to five countries); five consignments of hatching eggs; one consignment of zoo animals; and three consignments of laboratory animals.

ANAO's sample that required post-entry quarantine, the ANAO was able to find some documentation to indicate that the animal had been in quarantine.

Release without post-entry quarantine

3.24 The remaining 39 consignments were released on arrival as all import conditions were met. These were consignments of dogs and cats from New Zealand (12), reproductive material (13) and disability assistance dogs (14). The disability assistance dogs and one consignment of reproductive material were released under conditions of quarantine surveillance. However, the release was not documented in three instances.

3.25 Import conditions require disability assistance dogs to spend at least 30 days under quarantine surveillance. During the surveillance period, the handler must meet a set of conditions. Although the conditions are part of the permit, the instructional material requires the dog's handler to sign a declaration form agreeing to the conditions of quarantine surveillance. The quarantine officer must endorse the declaration. Confirming that the handler understands the conditions of surveillance is important as there are significant consequences for non-compliance, including imprisonment. For the 16 disability assistance dogs in the ANAO's sample, 14 had been released under surveillance on arrival. The remaining two were ordered into quarantine as the importation conditions had not been met.⁵⁴ Of the 16:

- six dogs had a declaration form that had been signed by the importer only;
- nine dogs did not have a declaration form; and
- one had a form that had been signed by the importer and endorsed by a quarantine officer four days after the dog had been released from quarantine surveillance.

3.26 Disability assistance dogs can be released from the conditions of quarantine surveillance after the specified period of surveillance has been completed and the importer has provided a satisfactory health check report from a private veterinarian. Of the 16 dogs reviewed, three did not have the

⁵⁴ These two disability assistance dogs are discussed further in paragraph 4.24.

required health check report and one was released six days before release was allowed by the import conditions.

3.27 The single consignment of reproductive material released under quarantine surveillance had been identified by officers as potentially containing illegal material. DAFF advised that the conditions of surveillance instructed that the material not be removed from the quarantine facility (which was a QAP) or used. The consignment was later exported when officers confirmed that it did not meet the import conditions.⁵⁵

Systems supporting the national management of live animal imports

3.28 As previously noted, DAFF's current systems are limited in their capacity to analyse data to support the national management of the LAI Program. Where national reports can be run from AIMS and PEQS, the value in analysing this data is limited as:

- the systems do not contain a complete record for each consignment. Information for most consignments is recorded in a combination of electronic and hard copy formats. Details of the consignment and importer are held electronically while documentation of examinations is usually held in hard copy. Examination information that has been captured in electronic comment fields cannot be filtered for analysis;
- data has not been captured in AIMS consistently. For example, the number of animals in each consignment was not consistently recorded: for dogs and cats arriving from New Zealand, the quantity was recorded as numbers, units, kilograms, crates or packages. Similarly, it was not possible using AIMS records to identify the number of live fish or laboratory animals that had actually arrived.⁵⁶ The arrival of some disability assistance dogs had not been recorded in AIMS; and
- data may not be accurate. AIMS is not always a practical system for managing live imports as it can be slow. For example, fertilised eggs are susceptible to heat and need to be moved quickly from the port of

⁵⁵ Release is possible if quarantine officers have no reason to suspect that the consignment is a source of infection or disease and if the material in the consignment remained in a state of preservation.

⁵⁶ To provide the ANAO with the number of fish and laboratory animals that had been imported, DAFF collected data from each regional office.

arrival to the quarantine facility. For consignments reviewed by the ANAO, officers had expedited the clearance process by ordering the eggs into quarantine or to be released, prior to the eggs arriving in Australia. In these instances, the AIMS record does not align with the actual process that was followed and the integrity of this data for any meaningful analysis would be questionable.⁵⁷

3.29 Regular reports are not prepared for the LAI Program. DAFF collects information about the operations of entry management processes through informal mechanisms including teleconferences, daily communication with regional officers, consultation, site visits and conferences. This is a practical approach to manage day-to-day operations, but it does not assist with the collection and systematic analysis of data to develop a comprehensive regional and national view of compliance with the import conditions applicable to live animals.

3.30 If DAFF is to be in a position to better manage operational risks and target compliance activities, data needs to be collected and analysed systematically. For example, analysis of data:

- about the numbers, countries of export and ports of arrival relating to imported live animals;
- about the reasons why animals were seized, treated, re-exported or detained (where the conditions did not pre-empt this requirement); and
- to inform DAFF about regional and national non-compliance trends.

Conclusion

3.31 The examination of import documentation and consignments by officers and the directions given by officers were not clearly documented in many cases. Where checklists and other forms have been used to record compliance checks, there was generally greater assurance that import conditions had been met. Where documentation was missing, discretionary or inaccurate, DAFF was unable to demonstrate that officers had checked the consignment's compliance with import conditions. However, there were

⁵⁷ All imports must be reported to the Australian Customs and Border Protection Service through the Integrated Cargo System (ICS). Items of quarantine interest can be flagged by DAFF and added to the AIMS system. Clearance must be given through ICS and AIMS before goods can be released.

eight instances in the ANAO's sample, where officers had taken steps to manage identified non-compliance by ordering these consignments into quarantine.

3.32 The current system for recording the completion and outcomes of examinations does not support the analysis of data relating to importer compliance. Analysis of this data nationally should inform compliance activity and highlight emerging issues. Currently, there is limited capacity for DAFF to undertake such analysis. To be in a position to collect and analyse data nationally, DAFF needs to record examinations consistently across regions. Implementing a quality assurance process as part of the verification program would provide confidence that the data being collected and analysed is complete and accurate.

Recommendation No.1

3.33 To gain assurance that importers are complying with the import conditions required for consignments of live animals, the ANAO recommends the Department of Agriculture, Fisheries and Forestry:

- identify the information required to provide assurance that import conditions have been met;
- establish a mechanism for officers to record examinations consistently; and
- conduct regular quality assurance checks for a sample number of consignments as part of the verification program.

Department's response: Agreed

3.34 The department acknowledges Recommendation 1 and associated findings, which focus on the need to better document the activity of examining animals and their accompanying import documentation. The department agrees that improved records will assist the auditability of the system and will take steps to implement the ANAO's recommendation.

3.35 The department manages the importation of live animals and animal genetic material to minimise the risk of entry of exotic animal pests and diseases into Australia. The department notes that import clearance processes are only part of managing biosecurity risks. More broadly, risks associated with live animal imports are managed across the continuum through risk assessments, monitoring, surveillance and border and post border clearances, including AQIS supervision of animals in quarantine facilities.

4. Post-entry Quarantine Arrangements

This chapter examines DAFF's management of the quarantine facilities that house imported live animals during their periods of quarantine isolation.

Introduction

4.1 Most animals imported into Australia must spend time in quarantine isolation to ensure they are free of exotic pests and diseases.⁵⁸ Animals ordered into quarantine must be transferred to the quarantine facility in a manner that maintains the integrity of quarantine. While in post-entry quarantine, an animal's health is monitored for potential quarantine risks and access to quarantined animals is restricted to minimise the potential risk of pests and diseases escaping quarantine. After the required period of quarantine isolation, animals can be released if no pests or diseases of quarantine concern have been found.

4.2 To examine DAFF's management of post-entry quarantine, the ANAO examined the:

- post-entry quarantine facilities;
- processes for managing animals during post-entry quarantine; and
- release of animals from quarantine.

Post-entry quarantine facilities

4.3 Periods of post-entry quarantine isolation are undertaken at either a quarantine station or a Quarantine Approved Premises (QAP). Of the 168 consignments in the ANAO's sample that were ordered into quarantine, 117 consignments were sent to quarantine stations and 51 consignments were sent to QAPs. Table 4.1 outlines where these consignments were sent.

⁵⁸ Reproductive material, dogs and cats imported from New Zealand and disability assistance dogs are generally released from quarantine on importation.

Table 4.1**Imported live animals in the ANAO's sample by type of quarantine facility**

Government-run quarantine station	Quarantine Approved Premises
<ul style="list-style-type: none"> • 113 dogs and cats from countries in categories two to five • 2 disability assistance dogs • 2 consignments of hatching eggs 	<ul style="list-style-type: none"> • 23 consignments of fish • 15 consignments of laboratory animals • 6 consignments of zoo animals • 4 consignments of hatching eggs • 3 consignments of reproductive material

Source: ANAO analysis of DAFF information.

Quarantine Approved Premises

4.4 Under the *Quarantine Act 1908*, DAFF can approve places operated by third parties as Quarantine Approved Premises (QAPs).⁵⁹ As of 30 September 2009, 148 QAPs were approved to house live animals during periods of quarantine isolation and these are outlined in Table 4.2.

Table 4.2**QAPs that handle imported live animals**

Type of imported live animal	Number of QAPs
Fresh water and marine ornamental finfish	65
Zoo animals	17
Laboratory animals	64
Reproductive material	1
Penguins	1
TOTAL	148

Source: ANAO Analysis of DAFF data.

4.5 The requirements and specifications for each class of QAP can be quite diverse as QAPs are designed and approved to house specific species of animals. An example of a purpose-built QAP facility is shown in Figure 4.1.

⁵⁹ Under section 46A of the *Quarantine Act 1908*.

Figure 4.1**Example of a purpose-built QAP facility**

QAP enclosure purpose-built for two giant pandas imported from China in 2009.

Source: Adelaide Zoo.

4.6 Quarantine Approved Premises are administered by the Co-regulation and Support branch. Regional officers approve QAPs and audit their compliance with the conditions and criteria that underpin QAP approval. The approval process and audit regime is discussed in Chapter Five.

Quarantine stations

4.7 Quarantine stations are proclaimed under the *Quarantine Act 1908* as places where animals, plants or goods can be housed during periods of quarantine isolation. DAFF manages four quarantine stations where dogs, cats and hatching eggs may be accommodated (as outlined in Table 4.3).⁶⁰ These stations are operated by regional officers. Hatching eggs can also be housed at two privately operated facilities. During the audit, DAFF developed criteria to assess and approve these facilities as QAPs.

⁶⁰ The Eastern Creek and Spotswood quarantine stations may also accommodate other live animals, such as horses and pigeons.

Table 4.3**Quarantine stations managed by the LAI Program**

Station and location	Animals from the ANAO's sample
Eastern Creek Quarantine Station, New South Wales	Dogs and cats
Spotswood Quarantine Station, Victoria	Dogs and cats
Byford Quarantine Station, Western Australia	Dogs and cats
Torrens Island Quarantine Station, South Australia	Hatching eggs

Source: ANAO analysis of DAFF data.

4.8 The ANAO visited the quarantine stations at Torrens Island, Eastern Creek and Spotswood.⁶¹ These were selected as:

- Torrens Island is the only government-managed quarantine station for hatching eggs; and
- Eastern Creek and Spotswood accommodate more than 80 per cent of imported dogs and cats. Byford was not reviewed as the total number of dogs and cats accommodated there represented a relatively small proportion and it had been subject to an internal audit in May 2009.

4.9 DAFF's Internal Audit area examined the operations of the Byford and Spotswood quarantine stations, focusing on how quarantine risk is managed with respect to the importation of selected animals other than horses. The audit found issues in relation to the interpretation and subsequent management of risk, as well as inconsistencies in procedures between quarantine stations and non-compliance with procedures.⁶² Four recommendations were made: to analyse and manage identified inconsistent practices; to follow up instances of identified non-compliance; to obtain assurance that instructional material is sufficiently complete to manage quarantine risk; and to consider a booking system for quarantine stations to better manage capacity planning. The recommendations were accepted by DAFF and steps have been taken to implement them.

⁶¹ The ANAO's sample did not include consignments from Byford quarantine station.

⁶² The non-compliance issues identified related to: the weighing of animals on arrival at the quarantine station; the cleaning of crates; and the signing in and out of visitors. The audit also noted that DAFF had not provided sufficient or clear guidance on the management of quarantine risk to the third parties who were responsible for transporting animals to the Byford Quarantine Station.

Post-Entry Quarantine System

4.10 The Post-Entry Quarantine System (PEQS) is used by the LAI Program area and regional offices to manage imported live animals that are required to undergo post-entry quarantine at DAFF facilities. PEQS communicates directly with the department's ICON Permits database and calculates the mandatory length of quarantine stay for each animal based on the approved permit requirements and the animal's actual arrival date. PEQS disables all release functionality until the mandatory quarantine period has been met. Where an officer and/or veterinarian identify issues of biosecurity concern, a 'vet hold' can be applied in PEQS. The animal's electronic record is flagged along with all electronic reports and hardcopy records printed from PEQS. All release functionality is disabled in PEQS until the 'vet hold' status has been removed by the veterinarian.

Managing animals during post-entry quarantine

4.11 Animals are isolated after they arrive to minimise the potential risk of pests and diseases entering Australia. Until a consignment is released, it remains under quarantine control. To assess how DAFF maintained the integrity of quarantine, the ANAO reviewed the:

- guidance provided to officers;
- transfer of animals to quarantine facilities;
- the processes for controlling quarantine risks; and
- processes for monitoring animal health.

Guidance provided to officers

4.12 DAFF has revised instructional material covering processes for dogs, cats, fish and hatching eggs that have been ordered into quarantine. For example, the work instruction, *Clearance of Fertile Eggs going to an Approved Quarantine Facility*, was released in December 2009 and outlines officers' responsibilities for the safe transfer of eggs from the port of arrival (airport or seaport) to the quarantine facility. The quarantine station operation manual is also being revised to include new instructional material. It will be tailored for each quarantine station to accommodate the differences in infrastructure and location.

Transferring animals to quarantine facilities

4.13 Quarantine officers are responsible for the secure transfer of dogs and cats to quarantine stations on importation. All other consignments of live animals are transferred by the importer or the importer's representative (usually a QAP operator). The importer's responsibilities are specified in the import permit.

4.14 Animals are secured for transfer to the facility in a crate or box, which is sealed prior to export by the exporting country. The seal is to remain intact during shipment and is not to be broken until the animal arrives at the facility.⁶³

4.15 For hatching eggs, quarantine officers oversee the transfer from the port of arrival to the quarantine facility. For the ANAO's sample of six consignments of hatching eggs, there was documentation available to show that four of the six consignments had arrived safely. Of these, one consignment also had documentation to show that the consignment had been escorted. For the remaining two consignments, it was not clear that the eggs had been escorted to the facility.

Controlling quarantine risks

4.16 During periods of post-entry quarantine, live animals are housed in facilities designed to control quarantine risks. The infrastructure and practices at quarantine facilities are tailored for the animals being held. For example, hatching eggs are quarantined in sealed facilities to stop quarantine disease such as avian influenza being transferred to wild bird populations through contact or being spread by wind. Dogs and cats are housed in kennels or pens that keep animals separate to minimise the potential for pests and diseases to be transferred.

4.17 QAPs visited by the ANAO were either rooms within a larger facility or independent buildings. The QAP areas were to be kept locked and access was the responsibility of the QAP operator. Access to these quarantine facilities is restricted. Where the importer or their representative(s) is allowed access to the animals, DAFF has sign-in forms and training is in place to ensure that these people are aware of DAFF's quarantine practices.

⁶³ The seal would only be broken if it were necessary to access the animal on arrival.

Monitoring animal health

4.18 As previously discussed, consignments are examined on arrival. The extent of the examination varies with the risk the consignment presents. For example, consignments of mice are checked to confirm that the right number has arrived. For dogs and cats going into quarantine, the officer confirms at the airport that the dog or cat is alive and the expected breed, but the veterinary examination is undertaken at the quarantine station. Deferring the examination to the quarantine station helps to manage quarantine resources at the port of arrival and allows animals to be moved to the quarantine stations as quickly as possible. For consignments of fish going into quarantine, officers must confirm that each fish is a permitted species before allowing the importer to move the consignment to the QAP.

4.19 During quarantine isolation, animal health is monitored daily. For dogs and cats, quarantine officers record their observations on daily monitoring sheets (printed from PEQS). These documents were available for 88 of the 89 released dogs and cats in the ANAO's sample.

4.20 For consignments quarantined at QAPs, the QAP operator was responsible for daily monitoring and recordkeeping. For consignments of imported fish, the health of the fish in each tank is recorded on a daily monitoring sheet (the tank record). This documentation is kept by the QAP operator and examined by quarantine auditors (during QAP audits).⁶⁴

4.21 Quarantine officers inspect animals during quarantine and prior to release. Officers may extend the quarantine period to detain fish that are in poor health. For the consignments reviewed by the ANAO, there were three consignments where fish were held for further quarantine periods. Quarantine officers note on the tank record if the consignment was being held or if it had been released.

Conclusion

4.22 There are arrangements in place at quarantine stations and QAPs to manage the potential quarantine risks associated with imported live animals during post-entry quarantine. These arrangements covered transferring

⁶⁴ Audits of Quarantine Approved Premises are discussed further in Chapter Five.

animals to quarantine facilities, restricting access to the facilities, controlling animal-specific quarantine risks and monitoring animal health.

Releasing animals from quarantine

4.23 Animals can be released from quarantine if the period of quarantine isolation has been completed and no pests or diseases of quarantine concern have been found. Table 4.4 outlines the release status of the 168 consignments in the ANAO’s sample that were ordered into quarantine.

Table 4.4

Release status of the quarantined animals in the ANAO’s sample

	Quarantine station	Quarantine Approved Premises
Ordered into quarantine	117 consignments	51 consignments
Released from quarantine	92 consignments	39 consignments
Not due for release	25 consignments	7 consignments
Released under quarantine surveillance ⁶⁵	no consignments	5 consignments

Source: ANAO analysis of DAFF data.

4.24 When an officer is satisfied that the import conditions have been met and the appropriate documentation completed, the animal can be released from quarantine. For the ANAO’s sample:

- 89 dogs and cats, there were reports indicating that 86⁶⁶ had a pre-release examination by a veterinarian;
- five consignments of hatching eggs, DAFF had obtained acceptable test results and the importer had provided a second veterinary certificate confirming the acceptable disease status of the source flock and the exporting country. However, it was not clear that two of the certificates had been checked;

⁶⁵ Released under quarantine surveillance after completing the required period of post-entry quarantine isolation.

⁶⁶ This includes nine reports that were incomplete but did indicate that a veterinarian had conducted at least a partial examination of the dog or cat.

- 11 consignments of laboratory animals, quarantine officers had obtained satisfactory test results for each consignment;
- two disability assistance dogs, the handler arrived to claim one and the other dog was released after DAFF established that the dog was eligible for an import permit;
- three consignments of reproductive material officers obtained necessary import documentation;
- one consignment of zoo animals, officers had been provided with the health report required; and
- 20 consignments of fish, officers had inspected the fish, although one of these inspections was not clearly documented.

4.25 In addition, a completed *Release from Quarantine* form was required for the 131 consignments that had been released from quarantine. For these, there were 26 instances where the release from quarantine form had not been completed as required by departmental procedures.

4.26 If the examination is not satisfactory and/or the conditions have not been met, the animals may be detained for a further period of quarantine, re-exported or destroyed. For the ANAO's sample, fish from six consignments were seized and destroyed in 12 separate instances because the fish were prohibited species or in poor health.⁶⁷ In five of these instances, the seizure was not documented.

Electronic records in PEQS

4.27 At the time of the audit, DAFF's work instructions for dogs and cats required the relevant forms to be printed from PEQS, completed by the officer and placed on the animal's file. Officers then finalised the PEQS record by 'selecting' the release date, which as previously noted, is calculated automatically by the system.⁶⁸

4.28 DAFF recently advised the ANAO that these forms can now be scanned into PEQS and attached to the animal's electronic record. This functionality was rolled out to the regions progressively from May 2009. In the longer term,

⁶⁷ The whole consignment was not destroyed in any of these six instances.

⁶⁸ DAFF advised that only the system administrator can override this release date.

DAFF intends to place greater emphasis on the use of electronic records. The work instructions will need to be amended accordingly.

Conclusion

4.29 While it was clear in most instances that officers had examined documentation that indicated animals did not present a quarantine risk before releasing the animals, the release from quarantine form was not completed for 26 dogs and cats. Missing documentation makes it difficult for DAFF to demonstrate that work instructions were followed, appropriate evidence was obtained and releases were authorised.

5. Managing Quarantine Approved Premises

This chapter examines DAFF's management of the Quarantine Approved Premises that house imported live animals during periods of quarantine isolation.

Introduction

5.1 Under the *Quarantine Act 1908*, DAFF approves businesses, universities, research organisations, zoological parks and government agencies as Quarantine Approved Premises (QAPs) to perform quarantine activities.⁶⁹ More than 2500 QAPs have been approved for various quarantine-related purposes. As previously noted (Table 4.2), 148 (six per cent) of these QAPs have been approved to house live animals during periods of quarantine isolation.

5.2 QAPs are administered nationally by the Co-regulation and Support branch, and regional quarantine officers are responsible for approving, renewing and monitoring QAPs.

5.3 The ANAO examined 39 of the 148 QAPs that house imported live animals and focused particularly on the processes for:

- approving and renewing QAPs; and
- monitoring QAPs' compliance with the conditions of approval and the criteria relevant to each QAP class.⁷⁰

Approval process for Quarantine Approved Premises

5.4 DAFF's website provides application forms and information about the assessment and approval process for potential QAP operators. Applications are assessed by quarantine officers against the *QAP Conditions of Approval* and the criteria relevant to each QAP class. The conditions, which must be met by all QAPs, cover recordkeeping, security and waste management requirements.

⁶⁹ Under section 46A of the *Quarantine Act 1908*.

⁷⁰ There are more than 30 QAP classes, each designed for a specific quarantine activity, such as incinerating quarantine waste, fumigating imported goods or housing live animals during post-entry quarantine.

The criteria are tailored for each class of activity and outline specific infrastructure and procedural requirements for that class. If a facility's application and initial audit are satisfactory, DAFF approves the facility to operate as a QAP and adds it to the Quarantine Premises Register (QPR) database. Of the 39 QAPs in the ANAO's sample: 35 were approved prior to 2008–09; one was assessed and approved during 2008–09; and three were assessed and approved during 2009–10.

Approving existing private quarantine stations as QAPs

5.5 DAFF has been restructuring its arrangements for managing the privately run quarantine stations that house zoo animals and hatching eggs. The four most recently approved QAPs in the ANAO's sample were zoos that had previously been quarantine stations.⁷¹ From 1 January 2009, these zoos were required to be approved as QAPs. Each of the four zoos applied and was audited and approved as a QAP between April and August 2009. Although two were audited after approval was granted, which is a departure from the usual approval process, neither received imported live animals until after an audit had been completed. The approval of two hatching egg facilities was pending at the time of the audit. DAFF advised that one facility had been approved and the other facility had approval pending.

Annual renewal

5.6 All QAP approvals expire on 30 June each year. Renewal is an administrative process; it is not dependent on regional officers completing the QAP audit program.⁷² The Co-regulation and Support branch issues renewal forms and collects fees, and the relevant regional office authorises approvals. QAPs that do not renew by 30 June are suspended in QPR. Renewals can be granted retrospectively for QAPs that apply and pay after the deadline.⁷³ For

⁷¹ Premises can be proclaimed as quarantine stations under s.13(1) of the *Quarantine Act 1908*. These zoos were proclaimed quarantine stations under s.14(1) of the *Quarantine Proclamation 1998*.

⁷² All QAPs were to be audited twice annually.

⁷³ Retrospective renewal is allowed under s.46A(7) of the *Quarantine Act 1908*.

the ANAO's sample, 36 QAPs were eligible for renewal in 2009–10.⁷⁴ All were renewed, with two being renewed retrospectively in July and August 2009.⁷⁵

Conclusion

5.7 Potential operators could access the application forms and information required to apply for QAP approval, and DAFF managed the annual renewal process appropriately. DAFF was rationalising its arrangements for managing private quarantine premises and was developing new QAP classes to assist with this process.

Monitoring QAP compliance

5.8 DAFF monitors QAPs' compliance with the conditions of approval and other relevant criteria through regular audits. Quarantine auditors in the regional offices receive specific auditor training and are responsible for scheduling and conducting audits of QAPs. They may conduct additional visits between audits to ensure criteria and conditions are being met. Regional offices are also responsible for managing identified non-compliance and, where necessary, escalating issues to the Co-regulation and Support branch.

5.9 In April 2009, the Co-regulation and Support branch commenced a verification program that includes periodic desk-based reviews of documentation for selected QAP audits from each region. DAFF advised that the verification program focuses on whether quarantine auditors understand work instructions and are applying them correctly.

5.10 To assess how effectively DAFF manages QAPs, the ANAO reviewed 131 audits (up to five consecutive audits for each QAP) and observed eight audits.⁷⁶ The 131 audits had been conducted between 27 October 2004 and 9 November 2009.⁷⁷ The ANAO also observed inspections at five QAPs and visited a further two QAPs.

⁷⁴ The other three QAPs in the ANAO's sample did not have approval in 2008–09.

⁷⁵ Neither of the QAPs that renewed after 30 June received consignments of imported live animals before its renewal was completed.

⁷⁶ The number of audits per QAP is outlined in Appendix 4. The ANAO observed audits in Sydney, Melbourne and Adelaide.

⁷⁷ The audits covered during this period were: two in 2004–05; three in 2005–06; 11 in 2006–07; 28 in 2007–08; 65 in 2008–09; and 22 in the period 1 July to 9 November 2009.

Conducting audits

5.11 Audits are conducted on-site at each QAP. Quarantine auditors interview QAP operators about procedures and operations; review files and manuals; and physically inspect quarantine rooms and facilities.

Audit checklists

5.12 Auditors use audit checklists to guide them through the audit process. The requirements and specifications for each class of QAP can be quite diverse as QAPs are designed and approved to house specific species of animals. Checklists are tailored to each QAP class and provide a list of the audit criteria. For example, the checklist for QAPs that house ornamental finfish includes 70 specific and detailed criteria. The ANAO observed during QAP audits that the length and complexity of the criteria made the checklists difficult to follow. As shown in Appendix 5, criteria are complex, include several sub-criteria and are not clearly separated. The checklists also contain duplicate criteria and are not presented in a logical audit sequence.⁷⁸

5.13 Checklists were used for the eight audits observed by the ANAO. Of these, the ANAO noted criteria being:

- *applied inconsistently at four audits*—for example, a quarantine officer issued a Corrective Action Request (CAR)⁷⁹ to a QAP operator requiring doors to be replaced. The same doors had been found satisfactory at two prior audits and the criterion had not changed; and
- *missed at one audit*—a quarantine auditor did not note or address a non-compliance issue.

The format and complexity of the checklists contributed largely to criteria being missed and applied inconsistently. A better-designed checklist would assist quarantine auditors to be more thorough in the conduct of audits.

Recording audit outcomes

5.14 The checklist was the primary record of an audit's outcomes. Where a single tick mark was made by the quarantine auditor (as shown in

⁷⁸ Examples of repetition are provided in Appendix 6.

⁷⁹ A Corrective Action Request (CAR) is used by quarantine auditors to document non-compliance with the QAP criteria or conditions of approval. These forms record the non-compliance issue, a due date for correction and a record of how and when the issue was corrected.

Appendix 5), it was not clear that all sub-criteria had been assessed. Of the 131 audit checklists reviewed, 112 (85 per cent) did not adequately document audit findings. Better-designed checklists that record the assessment of all criteria would provide better data for quality assurance checks, analysis and the reporting of compliance activities.

5.15 As of May 2009, quarantine auditors are required to provide an audit report to the QAP operator at the end of each audit. Audit reports capture the outcomes of decisions made by the auditors at each audit including: whether the QAP has passed or failed the audit; if the audit rate has been increased; and the reasons CARs have been issued.

5.16 From the ANAO's sample, 32 audits (across DAFF's five regions) were conducted after May 2009. Of these, seven QAPs received an audit report and a further three QAPs received a letter indicating that they had passed the audit. For the remaining 22 audits (69 per cent), there was no audit report or letter documenting that the QAP had passed or failed the audit. As a consequence, analysing the results of this audit activity at either the regional or national level would be difficult.

Corrective Action Requests (CARs)

5.17 Quarantine auditors issue a CAR when non-compliance is identified at a QAP. A standard form is used to capture details of the non-compliance and the due date for completing the remedial action. This date is negotiated between the auditor and the QAP operator and takes into consideration the severity of the non-compliance. Each form is given a unique CAR number, and more than one issue can be recorded on a form. For the 131 QAP audits reviewed by the ANAO, 41 CAR forms covering 99 individual non-compliance matters were issued. Generally, the matters related to infrastructure components such as doors and quarantine signs, drainage arrangements and decontamination procedures. The severity of the identified non-compliance was not classified or documented by officers.

5.18 Quarantine auditors are responsible for ensuring that each issue that has been raised in a CAR has been corrected. Currently, CARs are tracked by auditors in personal calendars or spreadsheets. CARs are not tracked nationally, and DAFF does not know how many CARs have been issued. Although some information about CARs can be captured in QPR comments fields for each QAP, these fields cannot be searched or used to generate

reports. DAFF advised that upgrading the QPR database to track CARs would be cost-prohibitive.

5.19 A CAR is closed when evidence of remedial action is provided by the QAP or noted at a follow-up visit. As of 1 August 2009, of the 99 non-compliance issues in the ANAO's sample:

- 15 had not yet reached their due dates and had not been closed;
- two did not have due dates and had not been closed;
- 74 had been closed.⁸⁰ Of these, 46 were closed after their due dates. The days overdue ranged from one day to 281 days (an average of 50 days);
- eight had passed their due dates, but had not been closed. These were overdue by between 47 and 899 days.

5.20 Of the non-compliance issues in the ANAO's sample that should have been corrected as of 1 August 2009, 11 per cent were overdue. Of the issues that had been corrected, 62 per cent (46 of 74) had been closed late. Although it is the QAP operator's responsibility to correct areas of non-compliance, it is DAFF's responsibility to ensure that issues are addressed in a timely manner and that appropriate follow-up action is initiated where this does not occur.

Verification program

5.21 As of 31 May 2010, DAFF had undertaken two rounds of verification reviews. These reviews included 18 audits⁸¹ for 13 QAPs that house ornamental finfish.⁸² The documentation for each audit was assessed against between six and 20 specific work instructions. Non-compliance with these work instructions was identified in 17 of the 18 audits reviewed. The number of non-compliance issues identified for each audit ranged from one to nine, and these issues primarily related to inadequate documentation. Feedback from the verification reviews was provided to each region. DAFF advised that the results and follow-up actions from verification reviews are reported to DAFF's management on a quarterly basis.

⁸⁰ This includes nine non-compliance issues that were due and closed after 1 August 2009.

⁸¹ Six of these audits were covered by the ANAO's sample.

⁸² Audits of QAPs handling zoo and laboratory animals were not reviewed.

Suspension of approval

5.22 Quarantine auditors can escalate QAP non-compliance matters to the Co-regulation and Support branch when suspension is seen as the most appropriate response. Prior to January 2010, regional quarantine auditors determined the significance of non-compliance matters and escalated issues to the Co-regulation and Support branch as necessary. In January 2010, DAFF issued a new *Audit and Sanctions Policy* document that outlined how non-compliance would be classified—as minor, major or critical.⁸³ The new policy specifies that the suspension process should be triggered when a quarantine auditor detects a critical non-compliance matter or identifies a sufficient number of major or minor non-compliance issues.

5.23 Once the suspension process is triggered, the Co-regulation and Support branch issues a ‘Show Cause Notice’ to the QAP operator outlining why DAFF is considering suspension. It also gives the QAP operator the opportunity to respond with reasons why their approval should not be suspended. Of the 148 QAPs approved by DAFF to handle live animals, two were issued a Show Cause Notice during 2008-09. Both QAPs were able to work with DAFF to resolve the non-compliance issues. Although neither was suspended, both were put under an increased audit regime, and DAFF continues to manage the identified risks through surveillance monitoring.

5.24 If there is a breach of the Act by a QAP operator, such as a critical non-compliance, an incident report may be referred to DAFF’s Compliance and Investigations area for further investigation and, in some cases, referral to the Commonwealth Director of Public Prosecutions (CDPP) for legal action. In 2009–10⁸⁴, 29 issues (involving 17 QAPs) were referred to, and investigated by, the Compliance and Investigations area. These issues related to, for example, the importation of prohibited species and breaches of approved protocols. Of the 29 issues:

⁸³ Critical non-compliance is described in the *General Policies* document as ‘a breach of the *Quarantine Act 1908* (Cwlth), or a major breach of the responsibilities and/or the requirements stated in the *QAP Conditions of Approval* and the relevant QAP class criteria’. Major non-compliance is a breach of the conditions and criteria, and minor non-compliance is a less serious breach of the conditions and criteria.

⁸⁴ 1 July 2009 to 12 April 2010.

- 17 were unable to be substantiated;
- one was referred to the CDPP (and the investigation is still ongoing);
- four were referred to external agencies other than the CDPP;
- three resulted in DAFF issuing a letter of advice; and
- four are still under investigation by the Compliance and Investigations area.

Scheduling and completing audits

5.25 At the time of the audit, the work instruction required that each QAP be audited twice a year. DAFF advised that, for all QAPs, 99 per cent of required audits had been conducted in 2008–09. DAFF further advised that audit completion data for specific QAP classes was not collected or distributed to relevant program areas (such as the LAI Program). The ANAO calculated that, for its sample of 39 QAPs, 72 audits were due in 2008–09.⁸⁵ Of these, 64 audits (89 per cent) had been conducted in 2008–09.

5.26 DAFF derives its data on audit completion from the dates recorded in the QPR database by quarantine auditors. For the ANAO's sample, these dates usually corresponded with completed audits; however, the ANAO also found audit dates recorded in the QPR database when either an audit had not taken place or only a partial audit had been conducted. This practice contributes to inaccurate QPR reports on audit completion. As QPR reports are DAFF's primary source for determining whether QAPs are being adequately monitored, the data entered into QPR needs to be accurate. Quality assurance checks on QPR data would be beneficial.

5.27 In addition, inconsistent audit scheduling methods used across the regions affect the reliability of QPR reports. Each regional office manages its own audit schedule, and each of the three offices visited by the ANAO had its own method and database for scheduling audits. Both calendar year and financial year timelines were used to calculate the completion of the biannual audits. There would be merit in aligning all regional audit schedules

⁸⁵ This figure is based on two audits each for 35 QAPs and one audit each for the two zoos that were approved prior to 30 June 2009 (discussed in paragraph 5.5). The two zoos that were approved after 30 June 2009 were excluded from this calculation.

to a financial year timeframe. This approach would also align the completion of the audit schedule with the annual renewal of QAP approvals.

5.28 As previously noted, a QAP can be renewed without being audited. In the ANAO's sample, four QAPs were renewed for 2009–10 that had not been audited in 2008–09. One QAP had not been audited in over ten years. Although the QAP maintained continuous approval during this period, it did not receive any imports.⁸⁶ From the ANAO's sample, eight consignments of live animals were directed to two QAPs where audits were overdue.

5.29 Given it is DAFF's responsibility to audit QAPs, it would be difficult to delay or refuse a QAP's renewal on the grounds that it had not been audited. DAFF still needs to assure itself, however, that its requirements are being met and that active QAPs are being monitored appropriately. As part of the renewal process, DAFF could flag QAPs that are overdue for audits and advise the responsible regional offices. A flag in the QPR database could also alert officers when permits are requested involving QAPs that are overdue for audits.⁸⁷ DAFF could then put processes in place to audit QAPs before imports arrive.

5.30 Under DAFF's new policy, the audit rate for new QAPs will, depending on the QAP class, be either two or three audits per year. The audit rate for all QAPs will also vary depending on the number and significance of the non-compliance issues identified. Higher-risk QAPs will be audited more frequently. Given the current audit schedule has not been completed, it may be difficult to meet the potential increase in the audit rate.

Conclusion

5.31 DAFF monitors QAPs to ensure that operators comply with the conditions of approval and the criteria relevant to each QAP class. Regional offices are responsible for undertaking regular audits and managing non-compliance. However, for the ANAO's sample:

⁸⁶ DAFF advised it will recommend the cancellation of this QAP's registration.

⁸⁷ The issuing of import permits is discussed in Chapter Two.

- 11 per cent of audits were overdue;
- 85 per cent of audit checklists did not adequately document audit findings;
- 69 per cent of audit reports were not completed;
- 11 per cent of identified non-compliance issues were overdue; and
- 62 per cent of identified non-compliance issues had not been addressed in a timely manner.

5.32 The Co-regulation and Support branch collects data on audit completion. However, this data is not reliable, and it is not analysed. Consequently, relevant information about overdue audits is not being shared with program areas, such as the LAI Program. Because the LAI Program is not informed about overdue audits, it is unable to evaluate the potential risks involved in allowing animals to be housed at these QAPs.

5.33 Audit checklists are designed to assist quarantine auditors. The checklists reviewed by the ANAO did not clearly record which criteria had or had not been checked at each audit. There would be merit in revising the checklists so that criteria and sub-criteria are concise, clear and presented in a logical sequence. The majority of audit reports in the ANAO's sample were also not completed. DAFF could better assure itself that audit checklists and audit reports had been completed by conducting quality assurance checks on a sample of audits.

5.34 Where non-compliance was identified through audits, CARs were not classified by severity or addressed in a timely manner. Regions have discretion in how CARs are tracked and the Co-regulation and Support branch has no oversight of this process. Currently, DAFF does not have adequate assurance at either the regional or national level that QAPs are being monitored effectively. Establishing a national capability to track and record audits, and any non-compliance issues flowing from the audits, would enable the department to analyse this information on a regional and national basis to inform quarantine decisions and future compliance monitoring activities.

Recommendation No.2

5.35 To inform quarantine decisions and future compliance monitoring activities for Quarantine Approved Premises (QAPs), the ANAO recommends that the Department of Agriculture, Fisheries and Forestry establish a national approach to:

- track and record audit completion and results;
- track and record identified non-compliance issues; and
- analyse audit outcomes and non-compliance data on a regional and national basis.

Department's response: Agreed

5.36 The department agrees with Recommendation 2, that better tracking of QAP audit outcomes and data analysis is needed to inform quarantine decision making. The results of the quantitative analysis of audit data relating to live animal quarantine approved premises undertaken by the ANAO align with the department's findings through its own verification processes. The department is therefore in the process of improving both processes and documentation for auditing QAPs. This is acknowledged by the ANAO.



Ian McPhee
Auditor-General

Canberra ACT
23 June 2010

Appendices

Appendix 1: Full response from the Department



Australian Government
Department of Agriculture, Fisheries and Forestry

ACTING SECRETARY

7 June 2010

Mr Matt Cahill
Group Executive Director
Performance Audit Services Group
Australian National Audit Office
GPO Box 707
CANBERRA ACT 2601

Dear Mr Cahill

Thank you for your letter of 6 May 2010 concerning the Australian National Audit Office's (ANAO) proposed audit report on the *Management of Live Animal Imports* and inviting comments from the department.

Australia has an enviable animal health status that few other countries enjoy. Our favourable animal health status underpins all domestic animal industries and gives Australia a significant advantage in international trade. The department has a critical role to play in maintaining Australia's animal health status through the implementation of efficient and effective biosecurity systems to manage the importation of live animals and animal genetic material.

The ANAO's proposed audit report highlights areas where the department can improve its systems and processes for managing live animals. The department agrees with the proposed audit report's recommendations and findings, and considers they align with the priorities identified by the department to improve the management of live animal imports.

In general, the department considers that improvements recommended by the ANAO are already being addressed, or are part of the broader reforms recommended by the independent review of Australia's quarantine and biosecurity arrangements, *One Biosecurity: A Working Partnership*, chaired by Roger Beale AO. The department's summary and formal comments on the proposed report are provided at Attachments 1 and 2, respectively.

The department would like to acknowledge the professionalism and courtesy shown by the ANAO audit team and the cooperative manner in which they engaged with department staff to ensure the correct information was gathered and reflected in the proposed audit report.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P Glyde'.

Phillip Glyde

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DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY

**Department of Agriculture, Fisheries and Forestry summary comments on the ANAO
proposed audit report on the Management of Live Animal Imports**

SUMMARY

The department agrees with the recommendations and findings of the ANAO audit report on the *Management of Live Animal Imports*. The recommendations and findings align with the priorities identified by the department. The department considers that the improvements recommended by the ANAO are already being addressed, or are part of the broader reforms recommended by the independent review of Australia's quarantine and biosecurity arrangements, *One Biosecurity: A Working Partnership*, chaired by Roger Beale AO.

The department welcomes the ANAO's acknowledgement that '*...DAFF has established a sound framework for managing quarantine risk ...in relation to the importation of live animals. The Department assesses quarantine risk and imposes import conditions pre-entry, at the border and post entry to mitigate these risks.*' The department acknowledges the primary findings of the ANAO, which focus on the need to better document the activities of examining animals and their accompanying import documentation. The department agrees that improved records will assist the auditability of the system, and will take steps to implement the ANAO's recommendation.

The ANAO audit report also usefully highlights areas to improve the effectiveness of monitoring of quarantine approved premises (QAPs). The department agrees that better national tracking of QAP audit outcomes and data analysis is needed to inform quarantine decision making and notes that work is already underway to improve both processes and documentation for auditing QAPs. The ANAO also notes that initiatives implemented by the department in 2009-10, which the ANAO was unable to fully take into account, improve the assurance capability of QAP monitoring by the department.

Attachment 2

**Department of Agriculture, Fisheries and Forestry formal comments on the ANAO
proposed audit report on the Management of Live Animal Imports**

The department thanks the Australian National Audit Office (ANAO) for its recent audit of the management of live animal imports. The ANAO's two recommendations and findings align with the priorities for improvements identified by the department. In most cases these improvements are either in the process of being addressed, or are part of broader reforms to Australia's biosecurity system identified by the review, "One Biosecurity: a working partnership" (Beale *et al.*, 2008), particularly in relation to improvements to information technology systems.

The department welcomes the ANAO's acknowledgement that '*...DAFF has established a sound framework for managing quarantine risk ...in relation to the importation of live animals. The Department assesses quarantine risk and imposes import conditions pre-entry, at the border and post entry to mitigate these risks.*' The department also notes the ANAO's statement that '*The audit did not examine the development of quarantine policy [or] the assessment of import risks...*'

RECOMMENDATION 1

General Comments

The department acknowledges Recommendation 1 and associated findings, which focus on the need to better document the activity of examining animals and their accompanying import documentation. The department agrees that improved records will assist the auditability of the system and will take steps to implement the ANAO's recommendation.

The department manages the importation of live animals and animal genetic material to minimise the risk of entry of exotic animal pests and diseases into Australia. The department notes that import clearance processes are only part of managing biosecurity risks. More broadly, risks associated with live animal imports are managed across the continuum through risk assessments, monitoring, surveillance and border and post border clearances, including AQIS supervision of animals in quarantine facilities.

The department notes that the findings of the equine influenza inquiry, chaired by the Hon. Ian Callinan AC, were publicly released in June 2008. As a result of the Callinan Inquiry, a new section (Horse Imports Program) was created in the department, and resources dedicated to the implementation of additional biosecurity measures associated with horse imports. The implementation of the Callinan recommendations is on schedule for completion at the end of June 2010. An independent review of the department's implementation of the Callinan recommendations was conducted by Professor Peter Shergold AC. To date, Professor Shergold has provided four assessment reports to the Hon. Tony Burke MP, Minister for Agriculture, Fisheries and Forestry, confirming that the implementation of the Government's response has been of a high standard and is on track. Professor Shergold further reported that the department has made good progress in strengthening biosecurity arrangements for horse imports.

Since the Callinan Inquiry's report was released in June 2008, the Live Animal Imports Program, within its existing resource base, commenced a range of activities to improve systems for other imported live animals. Detailed work plans were developed, and improvements progressed for other animal species in a deliberate order that took into account the associated level of biosecurity risk and volume of throughput. As the completion of the Callinan implementation draws near, the department's focus will continue to be on ensuring all imported animals benefit from the lessons learned from the Callinan Inquiry. The department will do this by further redistribution of the

resources that currently comprise the Horse Imports Program to progress the work that is already well underway in improving biosecurity and quarantine processes for other live animal species.

Specific Comments

As identified by the ANAO, the mandatory import documentation for all 207 animal consignments audited was held by the department and provided to the ANAO. The department acknowledges the audit findings about the need to improve record keeping in relation to the examination of import documentation. Improved record keeping will enhance existing control mechanisms and auditability provided by the Post Entry Quarantine System (PEQS) database, as recognised by the ANAO. Further improvements to the PEQS database since the ANAO's sample audit include the ability to attach scanned hardcopy documents, such as records of examinations, and link these to individual animal records. In line with the ANAO's recommendation, the department will continue to develop and implement such mechanisms to better record the examination of import documentation.

The department notes the ANAO's acknowledgement of the focus that has been placed upon improving instructional material and verification systems following the Callinan Inquiry. In addition to the extensive review and redevelopment of instructional material, the Live Animal Imports Program created detailed process maps to identify system weaknesses and inform changes to operational procedures for many imported live animal species. To ensure that this initiative continues to make progress, the department has developed, and trained officers in, new instructional material to ensure that biosecurity risks are managed.

The department is also undertaking verification activities that examine all aspects of the importation process, not just the examination of imported animals and their documentation. These activities assess whether officers are acting in accordance with the instructional material and that the instructional material continues to ensure appropriate management of biosecurity risks.

As noted by the ANAO, the department responds to all findings of non-compliant import documentation immediately and in accordance with the severity of the issue, including by re-exporting animals that pose an unacceptably high level of quarantine risk. Following immediate action taken to address potential biosecurity risks associated with the animal itself, the program responds more broadly by contacting the exporting country's competent authority, providing information to the Animal Biosecurity Branch for consideration in its risk assessments, and/or by updating the program's own website information, depending on the severity and type of non-compliance. This has been a longstanding process in the program that will continue.

The department agrees with the ANAO regarding the importance of formal systems that allow the broader collection and analysis of non-compliance information to support intelligence capability. As noted by the ANAO, the department implemented such an initiative, the "Non-Compliance Project" in 2009, following the development of the concept throughout the latter half of 2008. This system provides a mechanism to record each reported instance of non-compliant documentation, and allows for cross-referencing of the data in order to establish trends and allow pre-emptive action to be taken to minimise recurrences of non-compliant documentation in the future.

We anticipate that improvements to information technology systems as part of the broader biosecurity reforms would further allow the department to collect, analyse and verify information relevant to live animal imports. This would augment the additional record keeping recommended by the ANAO and provide further assurance that biosecurity continues to be managed effectively. Such an integrated IT solution would also assist to ensure that the establishment and maintenance of manual record keeping systems does not occupy an undue share of resources compared to the resources required to manage biosecurity risk pathways.

RECOMMENDATION 2

General Comments

The ANAO's proposed audit report also usefully highlights areas in which the department should seek to improve its processes and documentation for managing and auditing quarantine approved premises (QAPs). The department agrees with Recommendation 2, that better tracking of QAP audit outcomes and data analysis is needed to inform quarantine decision making.

The results of the quantitative analysis of audit data relating to live animal quarantine approved premises undertaken by the ANAO align with the department's findings through its own verification processes. The department is therefore in the process of improving both processes and documentation for auditing QAPs. This is acknowledged by the ANAO.

Specific Comments

The ANAO's findings: non-compliance management

The ANAO found that, over a five year period, 62 per cent of non-compliance issues identified in live animal QAP audits had not been addressed in a timely manner and 11 per cent were overdue.

As noted by the ANAO, the department has responsibility for the regulation of more than 2500 quarantine approved premises of which live animal premises make up only a very small portion. In 2009, 5145 QAP audits were undertaken by the department with 495 of these occurring at premises handling live animals. Of the total number of non-compliances arising from these audits, approximately 5 percent were identified at live animal premises.

Because of the large number of QAP audits that are undertaken each year, the severity or risk of non-compliances that are identified in audits is an important factor in determining how responses are prioritised. The degree of severity of non-compliances identified during audits varies considerably. Because of this, non-compliance close outs are managed on a priority basis, with some discretion and flexibility being afforded to the close out of lower priority issues.

In taking a partnership approach with industry, which is at the core of Australia's biosecurity system, the department has to consider both its regulatory position and the needs of industry participants. It would be counter productive if the department did not apply a risk based pragmatic approach when dealing with industry participants.

As such, timeframes for rectification are set in conjunction with the industry participant, taking into consideration the severity of the non-compliance. The operational practicalities of managing large numbers of premises may result in close out dates shifting or confirmation of close out occurring after the original timeframe set.

The ANAO was unable to evaluate the severity of audit non-compliances in its analysis but noted that the new Audit and Sanctions Policy should assist in addressing this issue.

The ANAO's findings: documentation of audits

The ANAO found that, over a five year period, 85 per cent of audit checklists did not adequately document audit findings and that 69 per cent of audit reports were not completed. The ANAO also noted that a number of initiatives that have been implemented over the past year improve the effectiveness of quarantine approved premises monitoring by the department.

The department acknowledges that the length and complexity of the audit checklists make them difficult to follow and that this was the major contributor to audit findings being inadequately documented. The issues with the audit checklists arise from a lack of IT system functionality and work is underway to move to a new IT system. In the short term, a review of existing checklists and consultation with the regions will seek to ensure existing documentation is properly completed.

The department has also improved staff instructional material and developed verification programs. In 2009, instructional material was released to staff detailing the processes for undertaking quarantine approved premises audits and the associated documentation requirements. Verification activities also commenced in 2009, and the information obtained from these processes is informing work instruction enhancements, improvements to staff training and risk management.

Further improvements since the ANAO's sample audit

On 1 January 2010, the department implemented a quarantine approved premises *Audit and Sanctions Policy* and at the same time, provided non-conformity classification guidance to staff.

The *Audit and Sanctions Policy* incorporates a risk based approach to determining quarantine approved premises audit rates, ensuring that resources are focused on higher risk quarantine approved premises classes and areas of poor industry performance. The non-conformity classifications complement the *Audit and Sanctions Policy* and ensure that staff have the necessary guidance to support decision making when dealing with non-compliance.

These initiatives have improved the department's capacity to monitor co-regulatory arrangements more effectively and to ensure that audit resources are appropriately aligned to risk.

The department acknowledges the ANAO's conclusion that it needed better assurance that quarantine approved premises were being monitored effectively. The department is of the view that the initiatives that were implemented during the 2009-10 financial year, and which the ANAO was unable to fully take into account, have significantly improved the department's assurance capability for quarantine approved premises. This is expected to improve further as the full benefits of the *Audit and Sanctions Policy* are realised.

The provision of additional auditing resources in the 2010-11 financial year will also contribute positively to the department's capacity to manage the risks associated with co-regulatory arrangements with industry.

Appendix 2: Countries approved by DAFF to export live dogs and cats to Australia

AQIS Approved Countries			
Approved Rabies-Free Countries and Territories - No Quarantine Required			
• Cocos (Keeling) Islands	• New Zealand	• Norfolk Island	
Approved Rabies-Free Countries and Territories Minimum of 30 Days Quarantine (Information Package 2)			
• Bahrain	• Barbados	• Cyprus	• Falkland Islands
• Fiji	• French Polynesia	• Guam	• Hawaii
• Iceland	• Ireland	• Japan	• Malta
• Mauritius	• New Caledonia	• Norway	• Singapore
• Sweden	• Taiwan	• The United Kingdom	• Vanuatu
Approved Rabies-Free Island Countries and Territories Minimum of 60 Days Quarantine (Information Package 3A)			
• American Samoa	• Federated States of Micronesia	• Kiribati	
• Papua New Guinea	• Solomon Islands	• Wallis and Futuna	• Western Samoa
Approved Rabies-Free Island Countries and Territories which may not have an official veterinary service Minimum of 60 Days Quarantine (Information Package 3B)			
• Christmas Island	• Cook Islands	• Kingdom of Tonga	• Nauru
• Niue	• Palau	• Tuvalu	
Approved Countries and Territories recognised by the Australian Government as Countries and Territories in which dog mediated rabies is absent or well controlled. Quarantine Time Varies & Rabies Vaccination (Information Package 4)			
• Antigua and Barbuda	• Argentina	• Austria	• Bahamas
• Belgium	• Bermuda	• British Virgin Islands	• Brunei
• Bulgaria	• Canada	• Canary/Balearic Islands	• Cayman Islands
• Chile	• Croatia	• Czech Republic	• Denmark
• France	• Finland	• Germany	• Greece
• Greenland	• Hong Kong	• Hungary	• Israel
• Italy	• Jamaica	• Kuwait	• Luxembourg
• Macau	• Malaysia (Peninsular, Sabah & Sarawak only)		• Monaco
• Montenegro	• Netherlands – Antilles and Aruba		• Netherlands
• Poland	• Portugal	• Puerto Rico	• Qatar
• Reunion	• Saipan	• Serbia	• Seychelles
• Slovakia	• Slovenia	• South Korea	• Spain
• St Kitts and Nevis	• St Lucia	• St Vincent and the Grenadines	
• Switzerland (including Liechtenstein)		• Trinidad and Tobago	• United Arab Emirates
• United States of America (not including Hawaii)		• US Virgin Islands	• Uruguay
Approved Countries and Territories recognised by the Australian Government as countries and territories in which dog mediated rabies is endemic (Information Package 5)			
• Republic of South Africa			
All Other Countries - Non-Approved			
AQIS does not allow the direct importation of cats and dogs from non-approved countries. The importation can only occur indirectly via an AQIS approved country. Cats and dogs must be continuously resident in an AQIS approved country for a minimum of six months prior to export to Australia. Cats and dogs then become eligible for import into Australia under the AQIS import conditions that apply to that particular approved country. AQIS will not accept any vaccinations or blood testing that is completed in a non-approved country.			

Source: DAFF.

Appendix 3: Summary of import conditions for live animals in the ANAO's sample

Import type	Pre-entry quarantine conditions	Exporting government to provide certification	Post-entry quarantine isolation required	Release possible when quarantine period completed	Conditions of release applied
Dogs and cats (category one countries)	No	Yes	No	N/A	No
Dogs and cats (category 2-5 countries)	In some instances	Yes	Yes	Yes	No
Disability assistance dogs	No	Yes	No	N/A	Yes
Hatching eggs	Yes	Yes	Yes	Yes	No
Fish	Yes	Yes	Yes	Yes	No
Reproductive material	In some instances	Yes	No	N/A	N/A
Animals imported by zoos	In some instances	Yes	Yes	Yes	In some instances
Animals imported by laboratories	No	Yes	In some instances	Yes	In some instances

Source: ANAO analysis of DAFF data.

Appendix 4: Sample of 131 QAP audits

The ANAO requested documentation for the last four audits for each of the 39 QAPs in the ANAO's sample. DAFF was able to provide at least 4 audits for 27 QAPs. The following table outlines the spread of 131 audits across the 39 QAPs in the sample.

Number of audits reviewed for each QAP	Number of QAPs in each situation	Reason	Total audit count
Five audits each	1	This QAP was under an increased audit regime due to non-compliance.	5
Four audits each	26	As requested.	104
Three audits each	6	In four cases, only three audits were provided by DAFF. In two cases, only three audits had been conducted.	18
Two audits each	1	Only two audits had been conducted.	2
One audit each	2	Both were recently approved QAPs. Only one audit had been conducted for each.	2
No audits	3	In one case, no audits had been conducted. ¹ In one case, DAFF did not provide documentation for any relevant audits. ² In one case, DAFF could not locate any audit documents. ³	0
TOTAL	39		131


Source: ANAO.

Note 1: This QAP was a newly approved zoo that had not yet been audited. It did not receive imports until after an audit had been conducted.

Note 2: This QAP was a laboratory that was approved for multiple QAP classes. It had been audited in 2008–09, but not against the class criteria for live laboratory animals. No live animals were imported in 2008–09.

Note 3: No documentation could be found because this QAP had not been audited in over 10 years. Although the QAP maintained approval over this period, it did not receive any live animal imports.

Appendix 5: Example of an audit checklist with complex criteria

	Quarantine Premises Register	
	Audit Check List	
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RefNo	Criteria	Result	Reason/Comments
472	The quarantine area must be kept locked when not occupied by staff.	✓	
476	An effective storage and pest control system must be in place, which ensures that fish food is not contaminated nor infested by pests.	✓	
480	No animals other than fish and live fish food are permitted in the quarantine area.	✓	
484	Suitable protective footwear must be kept inside the quarantine area. As a minimum, all persons entering the quarantine area must wear gumboots and preferably some type of water proof apron should be available. Prior to such items being removed, they must be disinfected in a manner acceptable to AQIS, which could include a footbath disinfection.	✓	
492	<p>The Quarantine area must comply with the following:</p> <p>Windows must be fly screened to prevent the entry of insects.</p> <p>The floor to be constructed of concrete, tiles, or other impervious material to enable hose down and disinfection with retention of all water and be sufficiently smooth with sufficient grade (grade applies to freshwater fish premise only) to drain to an approved septic tank, municipal sewerage or enclosed holding tank. NOTE: Wastewater not draining to an approved septic tank or sewerage system must be collected in a holding tank and treated (see RefNo 520 waste disposal) prior to release.</p> <p>Floor to wall junctions are to be effectively sealed or water proof coving provided at all floor to wall junctions. Walls to be constructed of impervious materials and be sufficiently smooth to enable hose down and disinfection. All gaps and cracks in the walls, floor and ceiling to be effectively sealed.</p> <p>Lighting of sufficient intensity, to allow proper inspection of all fish, must be provided - it may be necessary to provide supplementary lighting in the form of a hand held electric light (with a double insulated lead) if tanks are insufficiently illuminated.</p> <p>Floor drainage with an insertable plug or other mechanism to prevent accidental escape of fish or uncontrolled release of water. Drainage must be to an approved septic tank, municipal sewer or enclosed holding tank.</p> <p>Doors must have a self-closer to ensure it remains shut after entry, or there must be a self-closing insect proof screen door installed.</p> <p>Facilities must be provided for staff and AQIS Officers to wash their hands prior to leaving the Quarantine area.</p>	✓	
496	<p>All fish holding tanks must:</p> <p>Be identified with permanent placements of numbers or letters on the tanks.</p> <p>Be fitted with lids or other suitable arrangements to prevent transmission of pathogens between adjacent tanks due to splash from the aeration/ filter system, and to prevent fish escaping.</p> <p>Be arranged in a manner which permits ready access for inspection purposes, including a minimum width of 75 cm for corridors between rows of tanks or tanks and walls.</p> <p>Other than the fish, contain only sterilisable materials (eg plastic), provided that these materials do not interfere with fish inspection.</p> <p>Have at least the front and sides transparent to provide good visibility, and be stacked for adequate viewing.</p>	✓	

Source: DAFF.

Appendix 6: Examples of repetition in a QAP checklist

Example	Criteria
One	Criterion 28: It is the responsibility of the applicant to ensure the premises and all operations comply with all local, state and federal regulations and the relevant state Environmental Protection Agency requirements. Documented evidence of compliance with these requirements must be produced to [DAFF] upon request.
	Criterion 1038: It is the responsibility of the applicant to ensure that the premises and all operations must comply with all Local, State and Federal regulations including relevant State Environmental Protection Agency requirements. Documented evidence of compliance with these requirements must be provided to [DAFF] on initial application and at the request of a [quarantine] Officer.
Two	Criterion 52: Parking is to be made available for visiting [quarantine] officers.
	Criterion 504: Parking to be made available for visiting [quarantine] officer.
Three	Criterion 484: Suitable protective footwear must be kept inside the quarantine area. As a minimum, all persons entering the quarantine area must wear gumboots...Prior to such items being removed, they must be disinfected in a manner acceptable to [DAFF], which could include a footbath disinfection.
	Criterion 1026: [...] Suitable protective footwear must be kept inside the quarantine area (street footwear left outside the Quarantine area). Prior to protective footwear being removed from the Quarantine area, they must be cleaned in an approved disinfectant. [...]

Source: QAP Class 7.1 audit checklist.

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