11 July 2016

IGAB Independent Review Panel
Department of Agriculture and Water Resources
GPO Box 858
Canberra City ACT 2601

Via email: igabreview@agriculture.gov.au

Dear Sir/ Madam,

Re: Submission on the Intergovernmental Agreement on Biosecurity Review

Thank you for the opportunity to comment on the review of the Intergovernmental Agreement on Biosecurity (IGAB).

Sydney Airport is committed to the protection of Australia's biosecurity, and to supporting appropriate measures used to prevent, prepare for, detect and mitigate biosecurity risks, as well as responding to and recovering from any biosecurity incidents that may arise. However, with more than 40 percent of international visitors to Australia arriving at Sydney Airport as their port of entry, it is vitally important that this issue be considered in conjunction with other work being undertaken to improve border facilitation at Sydney Airport, and at entry points to Australia more generally.

The current process is not designed to be implemented at the current levels of demand and is not achieving appropriate customer facilitation outcomes. With the expected growth of international visitors over coming years, without changes to existing processes, the customer experience will continue to further deteriorate.

Our other major concern, outlined in this submission, is that this Review and any policy changes that may be implemented as a result of it, are not used as a vehicle for transferring costs or responsibility to industry.

We note that the Department of Agriculture and Water Resources (DAWR) has already engaged constructively with a number of key personnel at Sydney Airport. We welcome DAWR's commitment to continue to work with us on the issues outlined below, and for its commitment in general to optimising customer experience while undertaking its work protecting Australia's biosecurity.

Prioritising customer service without compromising biosecurity

Australia's biosecurity is a very important priority. However, it should be prioritised in a way that also enables high levels of customer service. Both biosecurity and customer service are important goals, and they should complement rather than compete with each other.

Inbound tourism and visitation to Australia remain essential to the Australian economy. Visitor numbers have increased dramatically in recent times, with international visitor numbers growing by 5.2 percent over 2015 to reach 34.87 million international passengers passing through Australian airports[1]. Sydney Airport continues to be Australia's major gateway airport, with 14.25 million international passenger movements over the year ending May 2016, at a growth rate of 7.2 percent over this period.

The ability to process the growing number of visitors effectively and efficiently through Australia's border therefore needs to keep pace with this growth, while continually improving the quality of service. Our customer feedback indicates that there are already problems in providing visitors with an efficient experience at the border, and with future growth forecast, we are concerned this will only deteriorate further.

The experience of international visitors to Australia at the border shapes their first and last impressions of Australia, and a positive experience for travellers at the border enhances Australia's reputation as a place to visit and do business.

Government should always be looking for ways to improve and upgrade existing processes, while preparing for future growth. In particular, reforms that minimise or expedite contact points and processes which are a source of frustration and inconvenience to passengers offer the prospect for improvement. Technological advances mean that automated processes can provide accurate and efficient processing of passengers, building capacity to handle future growth in inbound passenger numbers. For example, recent advances allow for the phasing out of paper forms, while the rollout of Smart Gates offers quicker facilitation to a greater number of passengers with less contact.

The use of technology and data allows for the development of a risk-based facilitation model, focusing human resources where they are needed most, and allowing a better experience for low risk passengers. Indeed, the International Civil Aviation Organisation (ICAO) Guidelines on Advance Passenger Information recognise that *"the routine examination of all passengers and their possessions* (is) *no longer a suitable way of processing the ever increasing passenger numbers."*[2]

Current moves towards a risk-based system, whereby the vast majority of passengers who do not likely pose a biosecurity (or other) risk, allow low-risk passengers to pass through the border with minimal contact points or disruption. Coordination between agencies is vital to the continued successful adoption of this approach and achieving the optimal outcome for all stakeholders.

We recognise that Australia's biodiversity is a key element as to why people visit Australia and buy Australian products. Australian wildlife is one reason tourists visit Australia, while the high quality of Australian produce drives not just tourism, but is also an important export item.

However, measures to preserve and protect Australia's biodiversity need not come at the expense of improving the passenger experience at the border. Indeed, it is imperative for a range of Australian industries that improvements to biosecurity and service are each treated as priorities without compromising the other.

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[1] Source: https://bitre.gov.au/publications/ongoing/files/International_airline_activity_CY2015.pdf

[2] http://www.icao.int/Security/FAL/Documents/1.API%20Guidelines%202013%20Main_%20Text_E.pdf at 3.1 (p7)

A comprehensive discussion of border facilitation issues that should be taken into account in reviewing biosecurity and other risk management strategies will be included in Tourism and Transport Forum's (TTF) forthcoming report, *'Welcome to Australia? Improving the air travel experience at the border,'* due for publication later this year.

Embedding shared responsibility

The discussion paper notes that shared responsibility is not a new concept in the context of border security. While there is doubtless an important role for producers, logistics firms, exporters and importers to play, it is also important that 'shared responsibility' is not used as a vehicle for transferring costs or responsibility to the private sector.

We are also concerned that embedding shared responsibility changes into the Biosecurity Act may inadvertently shift responsibility for certain actions away from those parties best able to manage the actions in question. For example, while airports undertake education or compliance activities relating to airport staff or contractors, they are unable to be responsible for other individuals and organisations operating in the airport precinct. Compliance activities in particular should remain strictly the domain of the Australian Government who are appropriately trained and resourced to handle biosecurity risks.

With approximately 29,000 employees working at 800 separate businesses operating at Sydney Airport, it is vital that the Australian Government has overall oversight of biosecurity risk management at the airport, and that each individual organisation operating at the airport is responsible for their own actions.

Thank you once again for the opportunity to comment on the review of the Intergovernmental Agreement on Biosecurity.

Yours sincerely

Kerrie Mather
Managing Director and Chief Executive Officer