

Strategic Recommendations

1. The department establish a dynamic working group to oversee reforms, including plant policy personnel, compliance representatives and industry representatives. This could potentially be a similar short-term working group co-chaired between government and industry, structured in a similar manner to the ICS Industry Action Group commissioned by the then Customs Minister in November 2005.
2. Government to allocate short-term funds to selected industry bodies represented on DCCC including FTA, the Australian Federation of International Forwarders, the Customs Brokers and Forwarders Council of Australia and Shipping Australia Limited. This would facilitate the necessary reform co-design and the development of user requirements in an appropriately resourced and co-ordinated manner.
3. Australian and New Zealand governments closer align BMSB measures for 2019-2020 season.
4. Staffing level caps imposed on the department to be lifted to ensure adequate resources are available to support key import services. Service levels must be restored to ensure that the department can fulfil its role as a trade facilitator while responding to serious biosecurity risks.
5. The department to expand and optimise existing programs including AEPCOMM, COLS, Biosecurity 2025 and the Approved Arrangements scheme, to more effectively distribute risk across industry and Government.

Operational Recommendations

1. The department to immediately increase investment in training and compliance processes relating to the Offshore BMSB Treatment Provider Scheme, to ensure that more of the biosecurity risk can reliably be mitigated offshore.
2. The department to expand the Highly Compliant Importer Program (HCIP) to facilitate proven compliant traders. An expanded HCIP program should seek to streamline procedures and allow more resources to be dedicated to genuine high-risk shipments.
3. The department to undertake industry consultation with the view to expand the take-up

and implementation of the Safeguarding Arrangements for Brown Marmorated Stink Bug Industry Guide.

4. The department's staffing level caps needs to be lifted to ensure that acceptable service levels can be restored and to enable the department to keep up with increasing volumes and complexity of trade.
5. The department's entomologists extend their hours to reflect the needs of industry and / or the department allow industry to engage private entomologists to make these decisions out of hours.
6. The department to consider inspections to be conducted by industry via Approved Arrangements.
7. Depots should be able to be request verification inspections, irrespective of the status of the fumigation, given the anticipated completion date.
8. Onshore treatment timelines to be extended to reflect the shortage of onshore treatment providers, particularly in Sydney and Melbourne.
9. The Government to undertake detailed industry engagement on COLS user requirements and allocate appropriate investment for any necessary upgrades.
10. The department to consider better utilisation of inspection officers in the field, with an ability to combine inspections at facilities irrespective of importer, freight forwarder, goods and the day of scheduled inspection of each shipment.
11. The Government to undertake detailed industry engagement to review the booking system and allocate appropriate investment for any necessary upgrades.
12. The department to consider incentives for the early lodgement of Full Import Declarations (FIDs) to encourage advanced reporting.
13. The department to introduce a dedicated BMSB hotline as an escalation point for urgent BMSB enquiries that meet agreed criteria.
14. The department to implement systems upgrades to allow importers and customs brokers to more easily and efficiently change directions and / or treatment providers and treatment locations.
15. The Department of Home Affairs to make the required changes in the ICS to better reflect the nature of holds that are in place.
16. The department should support the research and development of additional treatment



- options that deliver the necessary biosecurity outcomes.
17. The department engage with industry, state-based regulators and stevedores, to allow extended storage arrangements in prescribed circumstances relating to BMSB holds.
 18. The department urgently conduct industry consultation regarding the proposed BMSB 2019-2020 seasonal measures.
 19. Following the BMSB 2019-2020 seasonal measures consultation, the department urgently advise industry of the final detail to allow onshore treatment providers to scale operations to meet demand.
 20. The department commits to industry consultation for changes to BMSB policy, particularly when those changes occur mid-season.
 21. The department to provide industry and the department's operational arm with reasonable lead time before policy changes take effect.
 22. The department to regularly provide industry with an overview of the detections that have occurred and other basic information that relates to Australia's BMSB risk.
 23. The Biosecurity Act is amended so that importer or customs broker volunteered shipments in excess of AUD\$1,000,000 be processed without requiring the intervention of the delegate.