

Question 1

Considering the potential funding options and opportunities above, as well as from your experience, what elements do you think a sustainable biosecurity funding model should include? Are there elements that should not be included; if so, why?

Pathology Technology Australia—Dean Whiting

Remove unnecessary compliance costs for the import of pre-packaged and TGA registered pathology testing kits. While these kits may contain extremely low levels of biologically derived materials, the chances of these causing harm to agriculture or environment are extremely low. TGA registered imports are rigorously assessed for quality and compliance with a range of internationally accepted norms, including audits of manufacturers in the country of origin.

Question 2

How would your proposed model operate at a practical level and who would it apply to?

Pathology Technology Australia—Dean Whiting

Consider a system of light touch permit and fast track border clearance for pre-packaged and TGA registered test kits for pathology. Consider a system of "pre-accredited importer" for pathology supply companies who have a consistent and competent track record of permit application and import compliance. Imports covered by TGA registration and imported by companies with a sound track record could self-register permits or have a very light touch assessment. And be afforded a fast track or a waiver from inspection at the border.

Question 3

How would your proposed model impact you and others? What would be the benefits or disadvantages to you and/or other stakeholders?

Pathology Technology Australia—Dean Whiting

Important pathology test for human health can have a complex pathway through the BICON permit application process. These imports are often held up at border inspection and occasionally rendered unusable by inappropriate treatment at the border. However, TGA registered and pre-packaged pathology test kits pose an extremely low risk. A light touch permit assessment and fast track border clearance would speed access to often lifesaving test kits. It would lower costs for these imports. This would also free up experienced BICON staff and border officers to focus on higher risk imports. Pathology test import companies with little or no track record should follow existing pathways until they demonstrate compliance and competence for at least 12 months.

Question 4

Is the proportionality between those who contribute to the funding system and those who benefit the most, right?

Pathology Technology Australia—Dean Whiting

Those who benefit are all Australians, by way of good supply of Australian food and produce, and a healthy environment. In this sense, taxpayers should fund the bulk of costs, especially the cost of import permits. Low-cost permits will reduce the barriers to importers applying for permits and increase visibility to the nature of imports (that might otherwise have been imported without a permit).

Question 5

Are there other technologies, current or emerging, that could be employed to increase the efficiency of the biosecurity system, and perhaps reduce operational cost?

Pathology Technology Australia—Dean Whiting

Much of the documentation and requirements for BICON permits covering pathology test kits is, or could be, provided by the same documentation required for TGA registration. Consider technology that allows

sharing of documents and the evidence base common to TGA and BICON. As single government portal where such documents can be uploaded and accessed by multiple government departments could increase efficiency of business and government.

Question 6

How could the Commonwealth Government improve efficiency in the biosecurity system (consistent with meeting our Appropriate Level of Protection)?

Pathology Technology Australia—Dean Whiting

Assessment of BICON permit applications for pathology test kits and consumables can be complex and sometimes required detailed knowledge of science, technology and terminology. Efficient processing of permit applications often requires skill and experience, built up over a year or more. Public service headcount caps, imposed by governments, often forces commonwealth departments to retain temporary staff on an annual contract. This does not allow staff to develop the skills and knowledge required to efficiently assess permit applications. They need extra supervision and take longer, adding a repeating, short-term overhead to efficiency. Removing the cap and employing staff on a more permanent basis will build skill and experience, facilitating more efficient permit assessment. Instituting a light touch permit process for "pre-accredited importers" of TGA registered, pre-packaged pathology test kits will increase efficiency without adding risk.

Question 7

What other investments or actions could the Commonwealth Government make or take to sustainably support the delivery of biosecurity activities?

Pathology Technology Australia—Dean Whiting

Alignment of biosecurity permit and import requirements with like economies such as New Zealand, Canada and the USA. These countries have similar agricultural and environmental priorities and have import surveillance processes in place. Alignment across complying countries will facilitate smoother access and importation, at a lower cost, while maintaining a prudent level of protection.