



Australian Government
**Department of Agriculture
and Water Resources**

June 2017

Action Plan (Herbarium Samples through Mail pathway)

Background:

In April 2017, the Department of Agriculture and Water Resources became aware that there were two instances of destruction of Herbarium Specimens – one in Brisbane, one in Sydney. Both imports came through the mail pathway and were identified as having incomplete or nil import documentation.

A thorough internal review of both incidents by senior management identified improvements to avoid future reoccurrence. The review findings highlighted a number of process improvements and, importantly, confirmed compliance of the department's work instructions with relevant legislation.

Actions comprise themes involving staff training, process improvement and clarifying BICON conditions. The action below summarises the actions and timeframe for implementation.

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ACTION PLAN

Issue	Activity	Timeframe	Responsibility	Outcome
1. Training:	<p>1. Staff undertake refresher training in the following modules with an emphasis on handling botanical collections.</p> <ul style="list-style-type: none"> - Introduction to Mail Operations eLearning course - Mail assessment training course (classroom training followed by online knowledge assessment) - Mail assessment and inspection national job card. <p>These activities will all be registered in LearnHub</p>	6 months	Directors mail program and service delivery	
2. Process improvement	<p>1. Level of approval for disposal of commodities such as Herbarium specimens, or other items of like intrinsic value, to be assigned to Assistant Director.</p> <p>2. Instruction to gateway facilities to segregate goods awaiting documentation attesting to compliance from those goods routinely awaiting disposal.</p> <p>3. Confirmation of practice regarding goods arriving without a permit.</p> <p>4. Implementation of Operational Staff Notice (OSN) to clarify process for destruction of goods.</p>	<p>Immediate</p> <p>Immediate</p> <p>3 months</p> <p>1 month</p>	<p>Service Delivery</p> <p>Service Delivery</p> <p>Service Delivery</p> <p>Service Delivery</p>	<p>Completed</p> <p>Completed</p>

3. BICON case	1. Review BICON conditions to <ul style="list-style-type: none"> • specify preferred commercial pathway (air cargo) for conveyance of botanical collections • clearly express methods of disposal for goods forfeited to the Commonwealth. • Clearly express requirements for sender to more clearly identify botanical collections and declared value on packaging 	3 months	Plant imports	
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From: s 22(1)(a)(ii)
Sent: Thursday, 13 April 2017 4:48 PM
To: s 22(1)(a)(ii)
Subject: FW: Written confirmation required for Museum national d'Histoire naturelle material destruction [SEC=UNCLASSIFIED]

Importance: High

Hi s 22(1)(a)(ii)

As requested below is an updated chronological snapshot of events for the herbarium species for your reference.

Please let me know if you require additional details.

Regards

s 22(1)(a)(ii)

4 January 2017 (Wednesday)

- An Express Mail Service (EMS) package (box) containing conditionally non-prohibited goods arrived at the Brisbane Gateway Facility (Australia Post) from France without an import permit, addressed to Queensland Herbarium.
- The goods were declared and referred to the department via a Border Force referral
- The box did contain a document in French, which was translated by a departmental officer that did not identify the goods in accordance with requirements stipulated in the Biosecurity Import Conditions System (BICON)
- From the documentation that was fixed to the box the officer could not determine which of the following BICON cases were applicable to the conditionally non-prohibited goods:

Case: Herbarium specimens Effective: **11 Mar 2017 to 01 Apr 2017**

Fully preserved and identified — Not knowingly infected — Non-pathogenic algae, fungi, lichens, bryophytes or microorganisms — Not returning Australian specimens (**Import Permit Required**)

<https://bicon.agriculture.gov.au/BiconWeb4.0/ImportConditions/Conditions/CasePathwaySection?EvaluableElementId=198704&Path=UNDEFINED&UserContext=External&EvaluationStateId=3818a83b-6232-4fb1-8249-f9dfbde823fd&caseElementPk=610790&PathwayPk=489>

Case: Herbarium specimens Effective: **11 Mar 2017 to 01 Apr 2017**

Not fully preserved and identified — Not knowingly infected — Directed to a approved arrangement site or herbarium (**Import Permit Required**)

<https://bicon.agriculture.gov.au/BiconWeb4.0/ImportConditions/Conditions/CasePathwaySection?EvaluableElementId=198704&Path=UNDEFINED&UserContext=External&EvaluationStateId=b5f081f5-3105-4475-924b-b694f0e25c62&caseElementPk=610790&PathwayPk=255>

Case: Herbarium specimens Effective: **11 Mar 2017 to 01 Apr 2017**

Fully preserved and identified — Not knowingly infected — Vascular plants (**Nil Import Permit Required**)

<https://bicon.agriculture.gov.au/BiconWeb4.0/ImportConditions/Conditions/CasePathwaySection?EvaluableElementId=198704&Path=UNDEFINED&UserContext=External&EvaluationStateId=3818a83b-6232-4fb1-8249-f9dfbde823fd&caseElementPk=610790&PathwayPk=226>

- Subsequently the department could not ascertain whether the herbarium specimens required a permit or not
- The officer that initially stored the package in our detained goods area remembers the box as approximately 50cm x 30cm x 5cm in volume, wrapped in brown paper with documents (in French) affixed to the outside. The officer has no recollection of it having “ATTENTION QUARANTINE” written on the package (This is a required import condition for Herbarium Specimens not requiring an Import Permit) but does recall the customs declaration on the package stating an estimated value of \$2.00
- The goods were subsequently opened by Australia Post and inspected by a Biosecurity Officer who issued a Mail and Passenger System (MAPS) entry, reference no: QM17000010. The goods were secured and a MAPS direction was mailed to the client (Queensland Herbarium) outlining shortfalls with adherence to import conditions. This direction included clarification that unless arrangements were made for the goods to be exported to the sender, or additional information was provided demonstrating compliance with import conditions within 30 days of the notice, that the goods would be forfeited to the Commonwealth in accordance with s628 of the Biosecurity Act 2015.

6 January 2017 (Friday)

- Queensland Herbarium contacted the departmental detained goods Office (via telephone). During this call, the client identified that they had a permit but were not aware that they were being sent this specimen. Furthermore the client indicated that they would send through the required documents for release (i.e. Import Permit and Supplier Declaration).
- Despite this conversation, nil correspondence was received by the department until Friday 3 March 2017 (past the legislated 30 day timeframe). The client at this stage brought to the department’s attention that they attempted to contact the Detained Goods Office via email on Friday 6 January 2017, however that they mistyped the email address and subsequently the department did not receive the required documentation.

3 March 2017 (Friday)

- Queensland Herbarium contacted the detained goods office (via telephone). The Biosecurity Officer once again requested the appropriate documentation via email. An email was then sent to the department with the Import Permit (but lacking the required supporting documentation). The Biosecurity Officer then responded requesting the outstanding import documentation.

21 March 2017 (Tuesday)

- The department conducted a routine destruction of goods process, that is undertaken for goods that have been forfeited to the Commonwealth. This process involves verifying that goods are of low value, in this instance declared as \$2.00
- The box containing the herbarium specimens were part of this process given that they had been held by the department since early January, a timeframe well past the initial 30 day allowance for provision of information.
- Subsequently the goods were picked up by an approved waste handling provider for destruction.

23 March 2017 (Thursday)

- Queensland Herbarium contacted the departmental detained goods office with the appropriate paperwork to comply with import conditions outlined in MAPS direction QM17000010 dated 4 January 2017.

29 March 2017 (Wednesday)

- After investigations by the department, Queensland Herbarium were contacted by a Biosecurity Officer and informed that goods had been sent to waste provider for destruction.

31 March 2017 (Friday)

- The department sought cooperation from the waste handling provider to source the bins collected from the Brisbane Gateway Facility

3 April 2017 (Monday)

- The department contacted Queensland Herbarium and confirmed that despite efforts to source the bins over the weekend, that the box containing the specimens had in fact been incinerated by the approved waste handling provider.

- The department has instigated the following corrective actions:

- The officer that disposed of the goods has been counselled
- A separate storage area has been assigned for “Goods secured pending further information”
- MAPS paperwork is affixed to all detained goods and HOLD labels are being used with additional notation.
- Detained goods are now being held for at least 35 days past last communication (instead of 35 days after importation (as per legislative requirements)).
- 2 x officers are being used for all disposals, adding an additional layer of verification. MAPS is accessed and comments verified prior to disposal.
- All mail officers were informed of these changes.

Further control measures that are being introduced:

- A simplified email alias has been created (BNEmail@agriculture.gov.au) and will be provided on all written correspondence and directions sent to clients. This is to avoid confusion and typographical errors for our clients. The standard email address (BGFDGO@agriculture.gov.au) is more complex and leads to confusion. Both email addresses are active and direct emails into the same inbox.
- An email auto-reply is being developed to provide further information to our clients and to inform them of their email delivery/acceptance.



Media statement

Date Month 2017

A reminder of the importance of Australia's biosecurity import conditions

The recent media coverage of the destruction of herbaria specimens being imported by the Queensland Herbarium serves as a timely reminder of the importance of Australia's biosecurity requirements.

Plant and animal materials could harbour exotic pests and diseases that could damage Australia's unique flora and fauna, our communities and our \$59 billion agricultural industries.

The department acknowledges the significance of these specimens as a botanical reference collection, and their destruction was an unfortunate and regrettable outcome—however, it is one that could easily have been avoided had the package been sent with the required import documentation.

To protect Australia from potentially devastating biosecurity risks, we have special requirements that apply to the import of any items containing plant or animal materials.

Members of the public should avoid bringing plant or animal materials in through the mail, as there are biosecurity requirements that must be met.

However, special items—like museum specimens or other cultural and historical artefacts—need special handling, and the department facilitates the safe importation of many such items each year.

In the case of herbarium specimens, we require that they are free from pests, have a declaration to tell us what they are and are labelled so we can detect them amongst the vast numbers of mail items our Biosecurity Officers screen every day.

In the case of the specimens destined for the Queensland Herbarium, there was no prior notification of the package's arrival or its significance, and it was sent in the regular mail, wrapped in nondescript brown paper, with a declared value of \$2 and no special markings to indicate its importance.

This meant that there was nothing to distinguish it as unique amongst the 138 million mail items our Biosecurity Officers screen every year—until one of our sniffer dogs identified it as containing items that could pose a potential biosecurity risk.

Import conditions for herbarium specimens are important in order to protect Australia's unique flora and fauna, our communities and our \$59 billion agricultural industries from potentially devastating exotic pests and diseases.

The department has met with representatives from Managers of the Australasian Herbarium Collections to review this incident and assist herbaria representatives in understanding and complying with Australia's import conditions.

The department is also undertaking a comprehensive review of this incident and has revised processes to minimise the risk of a re-occurrence.

This is a timely reminder that when sending items through the mail, goods which may present a biosecurity risk must comply with Australian import conditions. Breaching Australian biosecurity laws can result in penalties including fines and prosecution.

To find out more, visit agriculture.gov.au/travelling

Approvals	
Line area approval	Lyn O'Connell, Nico Padovan
Date	12/05/17
Media	Bronwyn Hill
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