

From:
Sent: Friday, 7 September 2012 11:15 a.m.
To:
Cc:
Subject: RE: CSA initiative

Hi

Sorry to be a fly in the ointment but this is the first visibility I have had of the issue. I note in the consultation section that IRID was not consulted and as the manager of Intel and Risk I am somewhat surprised and annoyed that such an important initiative has progressed without direct discussion with us. Having said that, we are at least now being asked to input and I appreciate that.

China represents a huge set of risks and given the recent experience with students it seems we haven't learned any lessons. One of the key risks is imported criminality but because this is not a recognised adverse outcome for Immigration it seems to be ignored in visa decision-making. Further, being a frequent flier club is hardly a risk mitigation factor - in fact it could be seen as a risk enhancer when coupled with certain other factors. It is very easy to amass the qualification points by flying internally within China so a qualifying traveller might (and in most cases won't) have no international travel history. Every international criminal I have come across is probably a member of such a club.

I don't have time this morning to respond to this fully but IRID will coordinate a detailed response. I think it sets a very dangerous precedent and defers risk assessment to uninformed expedience in the way that seems to have been proposed. Appropriate risk assessment cannot be dismissed as irrelevant and the student fast-track process should have taught us that. There is something very wrong with a culture that derogates risk management in this way and which fails to consider the potential long term consequences. Even if the proposed idea had merit, there should be explicit audit and quality checks to adequately assess its operation. There should also be an assessment process which captures the Australian experience before any proposal paper is developed. IRID will use its contacts to gain that information and will input it into the process.

I also note that until recently China Southern had failed to provide APP data to the NZ Government meaning that our Border team had no forward vision of their flight passenger lists and were unable to profile what are in effect very high risk flights. Even since their compliance with this requirement, the quality of that compliance has been very patchy and but for political tolerance they would have received significant fines. The bottom line, however, is that we don't get good cooperation from them and we should be seeking to rectify that before any further accommodations are made. Perhaps a more robust consultation process would have identified this (assuming it wasn't already known).

We will conduct a full risk assessment of this proposal and forward it to you in due course. The work will be completed by IIR under direction. One of the risks that we will assess is reputational and we will consult with other departments on the impact that this proposed policy could have on them. This is not necessarily work that we should be doing but in the absence of anyone else doing it we feel it is necessary. It will take some time to prepare the assessment but I am happy to discuss any aspect of this in the interim.

Cheers

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