

Comments regarding Discussion Paper – Modernising Australia’s approach to managing established pests and diseases of national significance from the Department of Parks and Wildlife’s Ecosystem Health Branch.

1. Are the proposed Policy Principles appropriate and practical?

The expected roles and responsibilities of stakeholders are outlined in the document but this is something that needs to be discussed at a higher level with WA to ensure that we are able to undertake these roles and responsibilities within our current resources. Consideration should be given to the fact that this paper only concerns nationally significant species. WA has a lot of priority species that are not considered nationally significant so we need to be aware of this when committing resources at a national level.

It is agreed that prevention is more efficient and effective than management of established pests and diseases which are not eradicable. However, management of established pests and diseases may be a legitimate approach for conservation agencies such as Department of Parks and Wildlife if the objective is to keep the population of pest/disease below a level that causes significant environmental/economic damage or to protect particular values.

The proposed policies are appropriate, but their practicality depends on the relationships being developed and fostered amongst stakeholders. The current status of these relationships varies between each State and Territory. The principles definitely highlight the main outcomes of the Biosecurity Council Workshop – that all stakeholders need to clearly define their roles and responsibilities, work together to develop cost-sharing solutions and on-ground outcomes and that there needs to be communication strategies developed (probably both nationally and state) to ensure that the message is received by all stakeholders as to the way forward for the management of these particular species. The principles which highlights this are:

- the management of established pests and diseases is a shared responsibility between landholders, community, industry and government
- to achieve asset-based protection, government gives priority to supporting industry and community leadership and actions
- governments will work with stakeholders to support innovation for more effective pest and disease management

The principle *enforcement intervention should be the minimum necessary to achieve the desired result* is important. An understanding of how this principle will affect WA with the proposed review of the declaration process and the impact this will have on species that have nil/low/moderate impact on agriculture is required. If the Federal Government is going to make it a requirement that all States/Territories declare the species listed through this process, then this needs to be worked through at the Minister level to determine what impact this will have on the Department of Parks and Wildlife. Enforcement on its own can be a clumsy tool and can send a perverse message if the resources are not available to police the regulations. However, if enforcement is resourced regulation still has benefits as part of a suite of tools.

The policy statement, *to achieve asset-based protection, government give priority to supporting industry and community leadership and actions* is unclear in its meaning. The statement does not appear to be appropriate for asset based protection of natural assets, for example threatened flora or fauna which is unlikely to have industry leadership and may not have community leadership. This statement contradicts the Department of Parks and Wildlife's primary responsibility of conserving and protecting native animals and plants.

2. Are the proposed Policy Principles sufficient?

The Proposed Policy Principles are generally sufficient except there is no Policy Principle around the appropriate resourcing of government agencies and community groups to manage pests and disease of national significance. Without resourcing it is difficult to see how management will occur.

Suggest changing (under **Proposed policy principles**), *onshore management of established pests and diseases focuses on asset-based protection to minimise impacts* to include 'and to gather information so that the long-term financial, environmental, social, impacts can be projected'.

3. Should listing of established pests and diseases of national significance be for a defined period, or open-ended?

The listing of established pests and disease of national significance should be open ended based on re-assessment of feasibility and benefits of management. Unless it can be proven unequivocally that all management programs for a species around the country are not being effective, the listing should remain in place. As we are talking about established pests and diseases, they will never be eradicated, so if a species is taken off the list after a defined period, any resources committed to the species would be deemed to have been wasted.

4. What form of review should be required to maintain the listing of a pest or disease as an established pest or disease of national significance?

The review should be a re-assessment based on the national interest test as set out in the discussion paper and a review of all management programs that have been implemented for each of the listed species nationally. If any of them are successful, the species should remain listed.

5. What is an appropriate time period for such a review?

The appropriate time period for a review would depend on the particular pest/disease. Weeds in particular require very long-term management programs to ensure the soil seed bank has been depleted. As such the review period should be a minimum of five years to enable more accurate determination of the effectiveness of management programs.

6. Are the proposed roles and responsibilities clear, particularly in relation to your role?

They are relatively clear however the distinction between those government roles and responsibilities which are National and those which are State/Territory could be clearer. It is recommended that these roles are clarified to give States and Territories a truer picture of what would be expected of them.

7. Are the proposed roles and responsibilities appropriate and practical?

Yes, but this needs to be a policy direction provided by the Federal Government and agreed to by the State/Territory Governments and other stakeholders, with appropriate funding provided to government agencies to ensure adequate resources for undertaking enforcement actions and regulatory intervention. Currently the proposed roles and responsibilities are aspirational rather than practical or appropriate with the current level of resourcing.

The Department of Parks and Wildlife as a landholder has 28.5 m ha of management area including over 2m ha of marine areas. The department is responsible for weed and feral animal management on a further 89m ha of land. The potential numbers of established pests and diseases for which this management could intersect would result in the need for significant resources to be allocated to meet the roles and responsibilities of both government and landholder. The Department of Parks and Wildlife role is to manage the *state's national parks, marine parks, State forests and other reserves, for conserving and protecting native animals and plants, and for managing many aspects of the access to and use of the state's wildlife and natural areas*. In many cases it would not be within the departments responsibilities to provide support where *sustained collective action to manage an established pest or disease by and industry or community exists* unless the pest or disease was a significant threat to species conservation. The department does not have powers under the BAM Act regarding actions or controls in relation to invasive species and so would not be undertaking enforcement actions or regulatory interventions. For many of the roles and responsibilities the participation of the department would depend on relative priority of action to manage a pest or disease sat within the many priorities of the agency in managing the land and values for which it is responsible.

To estimate the returns on investment in pest and disease management there would need to be investment into research/monitoring of the effects of established pests/diseases.

8. What are the issues with establishing and maintaining effective collective action?

The perceived effect of any particular pest, weed or disease will depend on the values the landholder is managing. As such the level of support landholders may offer and their perceived responsibility will be dependent on the threat to those values. Similarly the importance of any pest weed or disease to an industry will depend on the potential or actual financial impact on that industry. Community groups too will vary in their dedication to managing a pest weed or disease depending on how highly the members of the group rate the threat posed. In addition, there may be conflict over the measures to apply to manage a pest, weed or disease. This will make collective action prone to conflict over roles and responsibilities. Maintaining an effective response over time will be problematic. In short when it is everyone's responsibility it is no one's responsibility.

There is a relatively small suite of experts in pest/disease management in each State/Territory and they end up on every committee and working group. The frustration for the person in charge of the committee/working group is that the members are too busy to do anything more than attend the meetings.

9. How can the coordinated approach be best implemented across the various stakeholder groups?

A number of groups/stakeholders may be involved, but there will always need to be a director of any effort to make decisions, decide on a course of action, implement it and review the implementation. Somebody has to take the lead and to receive the requisite resources to do that role properly and service cross-stakeholder groups.

10. How do you see yourself (or your interest/industry/organisation) contributing?

Where a declared pest, weed or disease is a significant threat to species conservation, the department would be involved in the management of the threat. Where such a threat was solely or largely located on the departments land, the department would manage the threat to the best of its ability within its resources.

11. Other comments