

SUBMISSION ON DISCUSSION PAPER “Modernising Australia’s approach to managing established pests and diseases of national significance”

Jacque Foyel with the help of others

PREAMBLE

The Discussion paper “**Modernising Australia’s approach to managing established pests and diseases of national significance**” diplomatically outlines the basis for allocation of scarce resources in the management of pests and diseases of national significance. The focus is on asset-based protection (ABP) and community collaboration. This submission is limited to weeds and weed management. Pests and diseases of livestock are outside the area of expertise of the author.

The challenge is to come to grips with a discussion paper that seems to cover many identified concerns but leaves the feeling that little will change other than reduced funding and more pressure for justification for project funding. The type of ‘modernizing’ approach required is one that restores stakeholder confidence and that leads to effective action, including targeted funding. At present at the local level it seems that weed issues are being ignored. This institutional apathy towards control is being further reflected in indifference by many stakeholders.

The case studies have not been studied but one would be looking for consistency with the proposed approach and accuracy in description of impacts. (For example blackberries do more than ‘altering water flows and reducing water flows’).

The discussion that follows relates primarily to the “protection of natural environments and ecosystems”.

DISCUSSION

In considering management weeds of national significance (WONS) and in a climate of scarce resources, the first requirement is to set strategic objectives. The list under definitions on page 2 is fairly self-evident and general enough to be considered as “objectives” but require more analysis and detail to be *strategic objectives* made under the *pressure of scarce resources*.

As well, these abstract objectives are intertwined as for example the “protection of natural ecosystems” is also linked to “amenity of resources, such as public lands, and has the potential to affect more than one state/territory, or Australian culture, cultural assets, practice or custom, or national image”. Regardless of the relationships among these very abstract objectives there needs to be a process to develop strategic objectives that will guide the best use of resources. (This is a consistent theme in the paper as funding is to be based on cost/benefit analysis and market driven approaches. It should be noted that placing a value on ecosystem integrity is notoriously problematic and a very specialised skill even with access to data. It is important that this requirement is either not made or at least circumvented by the funding agent having clearly displayed strategic objectives/priorities.

Such strategic objectives would surely identify:-

- Priorities for asset based protection;
- Actions to harness community energies and cooperation;
- Development of “opportunities” and support that enhance community efforts;
- The means to deal with those not willing to support any efforts

On Page 9 the roles and responsibilities proposed for government gives some clues to the

thinking along these lines but do not really address the criteria above. Throughout the paper there are statements that seem to cover these issues but they are too general to provide confidence that Government is passionately involved in dealing with WONS and has a plan for meeting its obligations to protect national assets.

DEVELOPMENT OF STRATEGIC OBJECTIVES (as applying to natural environments and ecosystems)

1. Priorities for asset based protection. (Areas where Government has a responsibility to ensure protection, eradication or asset base management as appropriate.)

Representative areas such as national parks and wilderness areas have been set aside to achieve protection of natural systems and ecosystems. Their size, (Possingham?) scope, regulated access and use is theoretically aimed at ensuring protection from a multitude of threatening processes (unfortunately being weakened by political pressure for tourism and mining). As well some States have classified roadside vegetation corridors to achieve similar outcomes. Some previous work under Land Care and community projects also require recognition as many of these projects were justified for the provision of corridors for fauna and flora adaptation to climate change. These should have recognition within strategic objectives. Perhaps communities should have the opportunity to register such areas?

Systematic identification and display of these areas and corridors is possible using GIS mapping. (Some project managers also use other GIS type programs to assist spatial understanding of their work). These existing and previously prioritised “back to the wall” assets are clearly the responsibility of government. Collaboration with interest groups is a reasonable tactic but their absence is not a reason for abnegation of responsibility. Regulation should be an essential weapon in the protection of these assets.

If Government identified such priority areas (it is recognised that this is a major program in itself but surely warranted to improve decision making) this would remove some of the burden of cost/benefit analysis in project submissions – a daunting imposition on groups. A tangible expression of priority areas available on a state by state basis on the internet would make it clear to stakeholders just what government is willing to support over and above other areas where personal responsibility for ABP is appropriate. This does not exclude more diffuse means of support for these other areas as outlined under 2. Such maps should be dynamic and could be used to focus attention on new outbreaks.

2. Actions to harness community energies and cooperation

What is meant by “community”?

“Community” is a convenient term often used to identify those living within an area and implies some form of bonding by virtue of common concerns. It would seem that the concept of “community” is used loosely without recognition of the impact of socio-economic/digital pressures on the capacity of individuals to be rallied and organised for “common good”. (Concerns requiring physical involvement are less shared these days)? It is agreed that cooperation of motivated groups is an essential component of successful weed management programs. However identifying and motivating a group in order to respond to a weed issue may require considerable effort from a leader within the district and such people may not exist in all districts especially in declining rural communities and those with urban influences.

Also “community” seems to be an ideological construct used to facilitate transfer of responsibility from Government. This approach is failing in mental health management and

caution should be exercised before relying on success by pushing pest and disease management further down the same path and relying too much on this approach. Many weed issues are in locations where individual responsibility is difficult and often not accepted (despite regulation) such as :-

- roadsides, bush land areas and small public reserves;
- where individuals are either unaware or indifferent to their presence of WONS
- where neighbours do not know each other
- where there is an expectation that payment of taxes substitutes for personal effort. (activity funded “boards” with regulatory powers should serve as their proxy).

As well, there is an increasing mood, bordering on despair that Government no longer cares or is willing to provide leadership and resources. It would seem that activity-based efforts of weed management are undermined by:-

- uncertainty about funding
- funding changes that often limit completion eg evaluation phases
- the need for specialised skills for funding applications
- leader “burnout” and group dependence on gifted leaders
- lack of recognition of changing ‘lifestyle dynamics’ that render people ‘time poor’
- qualified employees preferring strategy development to organising hands on activity
- project officers on short term contracts jumping ship towards the end of projects (if not physically then mentally)
- lack of continuity in advisory expertise
- over reliance on biological controls
- difficulty in obtaining regulatory support against recalcitrants

3. Development of “opportunities” and support that enhance community efforts.

Government may still have a tactical role in the many situations where ABP is the responsibility of other stakeholders. The provision of “opportunities” is a lower resource use way of doing this.

Biological control and access to expert knowledge/information fall neatly into this function. It should be noted that unfortunately there seems to be lack of recognition of the limitations of biological controls where populations and biomass are reduced but seed/fruit setting is not prevented. (eg Bridal Creeper, Salvation jane) and thus require prompt follow up (eg rabbits and Calicivirus). Such “innovations” should be implemented as part of an integrated weed management program designed prior to commencement. Also it should be remembered that information is not a resource if it is not used to support some action (eg Weed Apps).

Some Local Councils or catchment groups have arrangements to access or share equipment etc.

Land Care used group facilitators to assist group formation and to design approaches to issues. This form of support seems to have dwindled.

4. The means to deal with those not willing to support any efforts

It is acknowledged on page 4 that many new outbreaks of pests and diseases emanate from point sources within established populations that may or may not be managed under an ABP regime. Thus economically important industries may be threatened by pests and diseases coming from nearby neglected, underused or unrelated land uses with indifferent

ABP by a range of vectors such as, migration, birds and wind dispersion. (eg feral olives, fruit fly, rabbits, blackberries). Private land owners may be victims of local indifferent APB management, especially where the main source of infestation does not impose a significant cost on that land use. There may be little recognised incentive for ABP by the indifferent landowner but significant cost to other land users and ecosystems.

In non priority areas the unfair reality is that these are “local’ issues and that the responsibility for instigating asset protection usually falls to the potential victims. Ideally such landowners should be able to access local support, regulation and expertise. Taxation incentives should assist landowners with their own asset protection (including non-commercial). In some states, provisions exist for infestations of gazetted weeds to be revealed in the property description at sale so that the purchaser may adjust purchase price to include ABP costs).

At present achieving regulatory action is cumbersome where it should be timely and professionally executed with an attitude of mutual problem solving preceding any action.

THE CONSULTATION QUESTIONS (Some repetition of the above)

QUESTION 1 ARE THE PROPOSED POLICY PRINCIPLES APPROPRIATE AND PRACTICAL?

Proposed policy principles (in italics)

1. *onshore management of established pests and diseases focuses on asset-based protection to minimise impacts*

OK but not ignoring the benefits of prompt action on new infestations.

2. *the management of established pests and diseases is a shared responsibility between landholders, community, industry and government.*

Sounds good but ignores the reality that this is not always a shared belief or accepted responsibility and that identification of coherent “community” and “industry” is not always possible.

3. *to achieve asset-based protection, government gives priority to supporting industry and community leadership and actions.*

See above comments on “community”.

4. *governments will work with stakeholders to support innovation for more effective pest and disease management.*

Why are there less scientists employed in agencies? While the concept is supported, to date some innovations may be seen as replacements for effective action.

As noted earlier there seems to be lack of recognition of the limitations of biological controls and there is also the issue of emerging herbicide resistance that is not being faced adequately in environmental weed management (in contrast to awareness and strategies employed in the farming community). Innovative management practices are required to replace reliance on some herbicides.

The point is that “innovations’ while welcomed may encourage complacency but not

eliminate the need for concerted ongoing effort by stakeholders.

5. *enforcement intervention should be the minimum necessary to achieve the desired result.*

This is important to emphasise as compliance is mostly used as a last resort if at all. Compliance is unpopular for government though logically needs to be done in areas where community-led action is retarded by absentee, reluctant, or economically impoverished landowners. Often government owned-land is the offending space.

So while agreeing with this policy, it would be hoped that regulatory provisions would be strengthened to allow targeted and strategic actions. This would include allowing prompt and unfettered access to sites by regulatory personnel (as gazetted) where there are suspected or reported weed outbreaks or failed asset based protection - especially for the hopefully expanded 'risk creator' categories.

It would be anticipated that regulatory personnel have been trained and selected to appreciate the value of strategic regulation and the appropriate use of power. The value of joint problem solving with those not understanding or coping with weed issues should be emphasised.

6. *where there is a national interest to intervene, established pests and diseases assessed as being nationally significant will have an associated national management plan or strategy*

See need to develop spatial recording system. Timeliness may be the issue here as well as cooperation from unaffected States. Use of the precautionary principle in the event of a weed new to an environment would suggest that quick action should supersede bureaucratic processes. This brings to mind the spread of European wasp – seen as of no economic importance to agriculture in some States and thus ignored with significant consequences for the general population. (Has a lesson been learned?) Such strategies would be well supported by mapping.

7. *the list of established pests and diseases deemed nationally significant is regularly reviewed against the relevant assessment criteria and principles.*

It would be of equal, if not more value to regularly review the “relevant assessment criteria and principles” as they should be dynamic and responsive to the ever-changing domestic conditions and types of threatening processes.

QUESTION 2 ARE THE PROPOSED POLICY PRINCIPLES SUFFICIENT?

What are the policy principles that would restore the morale of weed management groups so that they believe that the government really cares? (see earlier comments)

QUESTION 3 SHOULD LISTING OF ESTABLISHED PESTS AND DISEASES OF NATIONAL SIGNIFICANCE BE FOR A DEFINED PERIOD OR OPEN ENDED?

What is the motive for this question? Asset based protection implies that eradication has not been achieved and therefore the risk is ongoing and requires vigilance. Perhaps as the need for asset-based protection diminishes a “watch” category is appropriate?

QUESTION 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?

This question raised the issue of when to give up and accept that a weed has adapted (man is an agent of evolution) and the ecosystem/habitat has changed to the extent that restoration to a pristine state may be counter productive to those species (including man) that have mutually adapted?

How is this condition to be identified?

Review of WONS status may be inappropriate as in some environments a WONS may be relatively benign in some and a raging pest in another. The proximity of other vulnerable assets would require consideration. Nevertheless in an environment of scarce resources a triage approach may be necessary. The form of any review should have wide ranging consultation accompanied by information (maps) identifying the degrees of infestation/adaption with costs and methods of ABP so that respondents and fund managers have a choice of priorities for future efforts.

QUESTION 5 WHAT IS AN APPROPRIATE TIME FOR SUCH A REVIEW?

Ongoing as information and resources require. What is the role of the precautionary principle? - 'Identification of key threatening processes' and 'threat abatement plans' should be in place before any review takes place.

QUESTION 6 ARE THE PROPOSED ROLES AND RESPONSIBILITIES CLEAR, PARTICULARLY IN RELATION TO YOUR ROLE?

The proposed policies are clear enough but do not imbue confidence that actions will follow. The crucial question is what *actual activities* will be funded under these policies to achieve objectives. At present the policies seem to indicate that support will only be forthcoming after the community has organised itself and as indicated earlier this may be wishful thinking without Government support and reduction in the demands of applying for project funding.

Many mature industries have the benefit of levy collection schemes and thus access to funds. Emerging and smaller industries (eg organic industry) may not be at that stage of maturity and thus not have access to funds.

My role is as a "concerned person" and these generalities do little to reduce that "concern".

QUESTION 7 ARE THE PROPOSED ROLES AND RESPONSIBILITIES APPROPRIATE AND PRACTICAL?

The policies appear appropriate but in the absence of implementation details it is not possible to comment if they are practical. There are reservations about the reliance on "community"; the timeliness and efficacy of regulation for recalcitrants; and the ability to move from theory to practice without enunciated and agreed strategic objectives. How are the demands managed from special interest groups that do not see themselves as "risk creators" but wish to have access to natural resources for recreation etc without wanting to meet stringent property hygiene requirements or to be willing to accept the fact that their wish to have access is not appropriate (recreational horse use; some campers; trail bikes etc)? Environmental concerns are often set aside to satisfy political pressure from other interest groups such as tourism and development.

QUESTION 8 WHAT ARE THE ISSUES WITH ESTABLISHING AND MAINTAINING EFFECTIVE COLLECTIVE ACTION?

See previous comments under “What is meant by ”community”

QUESTION 9 HOW CAN THE COORDINATED APPROACH BE BEST IMPLEMENTED ACROSS THE VARIOUS STAKEHOLDER GROUPS?

Is it necessary to coordinate across stakeholder groups? The difficulty is in establishing a super-ordinate goal to be shared by those passionate about ecosystems with those concerned about production outcomes and those who simply do not care as long as it is “green” and they don’t have to do anything?

QUESTION 10 HOW DO YOU SEE YOURSELF (OR YOUR INTEREST/INDUSTRY/ORGANISATION) CONTRIBUTING?

- Continuing to urge for mapping to identify strategic priorities for project funding.
- Trying to explain the limitations of transferring too much responsibility to an idealised concept called “community”
- Alerting policy makers in government to be more aware of the impact of their funding policies on the morale of people who want to protect natural resources and ecosystems.

SUMMARY

1. It has been difficult to muster a response to this paper as it describes appropriate thoughts but does not give any clues to how these will translate to actions on the ground. It also leads to a lack of credibility about in depth understanding of pest and disease dynamics. The term “modernising” may well be replaced with the phrase “economic rationalising”.
2. A spatial display of priority areas for the long-term protection of ecosystems would establish strategic objectives for Government responsibility and action. This would also reduce the need for groups to justify the need for support for appropriate actions in these areas. Completion of representative areas and corridors should be encouraged in related programs.
3. The limitations of promoting “community collaboration” should be realised.
4. Government support should be mindful of encouraging group morale and dedication especially during funding cycles.
5. Stakeholder application of the precautionary principle should be promoted when a WONS or a new weed to an ecosystem is found before embarking on bureaucratic “interest tests” or review. Prompt access to expertise is integral to this approach.



Jacquie Foyel