

## NRM Regions Australia response to the National Biosecurity Committee's discussion paper: *Modernising Australia's approach to managing established pests and diseases of national significance*

### Who we are

NRM Regions Australia is the national representative group of Australia's 56 regional NRM organisations. These organisations are key partners in the Australian Government's National Landcare Programme and other state natural resource management and related programmes.

Our member organisations work to maintain healthy and productive country that support viable communities, agriculture and industries. Natural resource management (NRM) is the responsible use of our land, water, soil, plants and animals to provide a good quality of life for current and future generations.

In partnership with our communities we work from the paddock to the regional scale to address issues that require a landscape perspective, aggregating to state and national scale. Our approach enables community and landcare activity to better address long term strategic issues of national importance in a flexible and adaptive way.

56 regional NRM organisations cover all of Australia. Many have been in existence since the mid-1990s and were established by State Governments in response to their policy directions or by the Federal Government as part of its Natural Heritage Trust program. All regional NRM organisations are governed by a Board – appointed by State/Territory Ministers in South Australia, New South Wales, Victoria, or elected/appointed by the community in Western Australia, Tasmania, Queensland and the Northern Territory. The ACT Environment and Planning Directorate is the regional NRM organisation for the Territory and the ACT NRM Council provides advice to the Directorate.

### Managing the impact of established pests and diseases is central to the business of NRM organisations

In 2012 NRM Regions Australia undertook a review of the 56 regional NRM plans prepared by our members and determined that the top two threats to sustainable NRM (measured by the number of regional plans identifying those threats) were Feral Animals (93%) and Invasive Weeds (89%).

It follows that pests and diseases are recognised as significant priorities by almost all our members and this is reflected in their work programs and the partnerships we develop with communities and agricultural industries in addressing established pests and diseases.

In addition, within some jurisdictions regional NRM organisations have statutory roles in relation to pests and diseases. For example in NSW, Local Land Services regions deliver a range of pest and disease management statutory services, in Victoria the Catchment Management Authorities develop regional weed plans to guide State and Federal investment, and in South Australia regional NRM

organisations focus on motivating communities and industries to action while delivering a range of statutory services.

## Responding to the Discussion paper

Before responding to the questions posed by the discussion paper we make the following points:

- We argue that a nationally coordinated approach is required and should align legislative responsibilities and governance at all levels and distribute resources strategically across regional and local areas.
- We know from experience that effective management of established pests and diseases requires effort and coordination across a number of fronts, for example research and development, compliance, extension, incentives and support for collective action at the local level.
- For long term success and to address severe or unexpected events such as plague or disease outbreaks, institutional and personnel continuity is required to ensure regional leadership and response capacity, knowledge, systems and community networks are in place in times of need.
- We fully support the statement that *for a number of established pests, only a coordinated approach is likely to achieve good results* but we note that coordination requires resources and is ultimately dependant on action on ground to deliver change. Coordinated on ground action is best delivered at regional scale and this should be factored into any national response.
- The paper makes a number of sweeping statements: *“However, significant resources have been invested in managing the visible and ongoing presence of established pests and diseases, which by definition are generally not considered to be eradicable”*. And *“These investments can also be inconsistent with accepted principles for public investments in activities that have predominantly private benefit and may undermine cost-recovery arrangements between governments and industry” (page 3)*. Our concern is that without a fuller explanation of these statements, they appear to be laying the groundwork for why the government should not be involved in addressing established pests and diseases. An alternative approach could include identification of factors that the government sees as important in managing non-eradicable pests and diseases in a way that does not distort cost-sharing and cost recovery.
- The section - Maximising returns from biosecurity investments – sets out the policy framework. It identifies four broad categories: prevention, eradication, containment and asset-based protection. But there is a fifth category - managing established pests and diseases. While we accept the logic implied in the model – resources should be directed to areas of greatest return, we suggest that the return needs to be measured against the role of government in optimising public benefit (including broader social and environmental benefits, and intergenerational equity) rather than simply maximising the economic return and that there are public benefits from managing established pests and diseases that do not meet the “containment” or “asset protection” criteria.

1) Are the proposed policy principles appropriate and practical?

If we accept the fifth category outlined above, the policy principles are appropriate. But it is difficult to discuss the practicality of those principles without more definition - for example what are the implications of supporting the principle relating to *industry and community leadership and actions*?

2) Are the proposed policy principles sufficient?

While the principles appear to be sound, it is difficult to make a definitive judgement without an analysis of the costs and benefits of the approach used to manage established pests and diseases over the past 30 years. Over this period we have moved from a straight enforcement approach to a community-based, coordinated action approach supported by compliance measures.

The most important principle is growing the community commitment to and capacity for active management of pests and diseases, linked to growing global market access.

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

We support the approach of identifying pests and diseases of national interest and note your recognition that this is not a new approach. The paper also establishes criteria (page 7) for testing whether a pest or disease is of national significance. We support the approach and the criteria proposed but assume they are not listed in "priority" order.

We also support defining those pests/diseases for a limited period. This will provide a clearer picture over time of the extent and impact of the pest/disease. A rigorous risk management approach needs to be undertaken to add or remove pests and diseases from the list, similar to the model that South Australia has adopted.

There is also a need to be adaptive, should an unexpected threat or opportunity arise. This could be a new incursion, or a drought for example.

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 include: extent and impact of pest/disease, public vs private benefits from controlling, success of control measures, the outcomes from local/regional/national research findings relating to the pest, attitudinal change to the pest, the impact of climate change and the forecasted impact of the pest.

5) What is an appropriate time for such a review?

We propose 5 years, subject to adaptive response to a new threat or opportunity. A national plan must be formed for each listed species, and its effectiveness reviewed periodically.

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

We note that the roles do not specifically refer to regional NRM organisations and assume the reference to the community implies organisations such as regional NRM organisations. This misses a significant opportunity for regional scale coordination, communication and delivery (noting this is already being undertaken in a number of jurisdictions).

The section covering roles and responsibilities for government does not distinguish between the national government and state/territory governments and its many references to pests and diseases of national significance can be read to imply that these are the priorities for all governments. It is conceivable that particular weeds that are not of national significance will be priorities for the states and territories. There may also be regional and local priorities.

We generally support the proposed roles and responsibilities but:

- propose an additional role specifically for regional NRM groups of *promoting integrated pest management across the landscape and pest types through adequate and appropriate planning and coordinated delivery*. This role dovetails with many of the Government roles outlined in the paper as well as the Industry and Community Group roles. Earlier in the discussion paper you refer to the benefits of coordinated effort, our proposed additional role reinforces this and seeks to ensure that pest management programs are planned, coordinated and integrated with other industry and NRM efforts;
- Suggest that the roles of “risk creators” could be strengthened;
- There would be benefit in specifying the roles of local, state and commonwealth government rather than having them aggregated.
- A key role of government must be well-designed monitoring, analysis, review and adaptation.

#### 7) Are the proposed roles and responsibilities appropriate and practical?

In general, yes. But note comments in relation to question 6 and we suggest a role for regional NRM organisations be specifically identified.

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

Controlling established pests is as much a ‘peoples’ challenge as it is a ‘killing pest’ challenge. We strongly support a collaborative approach and from our experience we caution against underestimating the challenge of gaining collaboration and the associated resources required to gain and maintain collaboration and community action.

To support this approach requires transparency relating to the rules for investment of government funds. You mention (page 10) that public funds should be invested “where they can add the most value”. It is very important to have a transparent and intelligent process to define this public value and how outcomes from investment will be determined.

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

With a concerted effort and injection of funds; through using existing networks and collaborations and by finding a common driver for that collaboration; and defining in regional NRM plans the approach developed with and for community, industry and all three levels of government.

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

Our primary role is to facilitate the collaborative approach (between landholders, community, industry and all three levels of government) at a regional scale and participate as a collaborator at

the State and National scale. In some jurisdictions we also have a role in on ground control programs, with the opportunity to expand this across Australia.