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National Biosecurity Committee Secretariat
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Response to the Established Pests and Diseases Discussion Paper

On behalf of Primary Industries and Regions South Australia and the Department of Environment, Water and Natural Resources (DEWNR), I provide the following comments in response to the discussion paper *Modernising Australia's approach to managing established pests and diseases of national significance*.

In general, there was a degree of congruence between the policy principles in the discussion paper and current approaches to biosecurity planning and implementation in South Australia.

The points below focus on a range of issues identified in internal discussions. The key concern raised was the need to recognise the validity and importance of priority setting done at a regional level when comparing a range of pest and disease species, that can vary from just detected to locally established to widespread, in deciding on appropriate management actions. In some cases, giving funding priority to on-ground control of a species only because it has been deemed of national significance, may not result in the optimal use of limited biosecurity resources.

Local/regional versus national species priorities

- A focus on established pests and diseases of national significance (EPDNS) should not be at the expense of strategic regional/local priorities. Experience with Weeds of National Significance (WoNS) has indicated that some species may attract investment over and above others that are not nationally significant, yet which pose a greater local risk and/or greater feasibility in containing spread.
- South Australia's eight Natural Resources Management (NRM) Boards use a standardised Pest Risk Management System to prioritise weeds and pest animals for local and regional control programs and to inform state policies. The System is in effect, a qualitative cost:benefit approach to determine optimal management of a pest, based on its stage of invasion and feasibility of control. Figure 1 shows the decision matrix for

the SA Weed Risk Management System¹. The SA approach allows for more complex and strategic thinking in biosecurity planning and investment, rather than simply classifying activities based on the invasion curve.

- Rather than just focusing on a small set of EPDNS species for government investment, consideration could be given to an alternative approach of co-investing in management of regionally determined pest and disease species priorities. These priorities would need to have been developed with and owned by the community, via an engagement and education process using a pest risk management system.
- A very small set of national priorities risks over-simplifying the complexity of Australia's climates, industries and ecosystems. If priorities include the value of land uses that are threatened, then would higher-value production systems have a greater focus than lower value (e.g. rangelands) under the EPDNS framework?

Figure 1 Risk management matrix to inform investment decisions in weed management in South Australia¹.

WEED RISK	FEASIBILITY OF CONTAINMENT				
	<i>Negligible</i> >113	<i>Low</i> >56	<i>Medium</i> >31	<i>High</i> >14	<i>VeryHigh</i> <14
<i>Negligible</i> <13	LIMITED ACTION	LIMITED ACTION	LIMITED ACTION	LIMITED ACTION	MONITOR
<i>Low</i> <39	LIMITED ACTION	LIMITED ACTION	LIMITED ACTION	MONITOR	MONITOR
<i>Medium</i> <101	MANAGE SITES	MANAGE SITES	MANAGE SITES	PROTECT SITES	CONTAIN SPREAD
<i>High</i> <192	MANAGE WEED	MANAGE WEED	PROTECT SITES	CONTAIN SPREAD	DESTROY INFESTATIONS
<i>VeryHigh</i> >192	MANAGE WEED	PROTECT SITES & MANAGE WEED	CONTAIN SPREAD	DESTROY INFESTATIONS	ERADICATE

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Importance of containment

- As illustrated in Figure 1, there is a vast difference in optimal management approaches between a species that is only just established in a single locality (but deemed non-eradicable) and a species that is widespread across a state. Containment is core business and central to the intent of declaration of established pest plants and animals under the South Australia's Natural Resources Management Act, to limit their further spread.
- Investment in on-ground management of widely established EPDNS, such as asset protection, should not be at the expense of containment of new pest and disease threats deemed not eradicable. The EPDNS policy framework should not simply focus efforts at

¹ Virtue, J.G. (2010). South Australia's Weed Risk Management System. Plant Protection Quarterly 25(2) 90-94.

either extremes of the biosecurity continuum. Much of the strategic work done by NRM in South Australia is intervention at the early stages of establishment, including surveillance, delimitation and control.

- Containment, as a best practice principle, also applies to non-regulated environmental pests and diseases. Additionally, containment should be more proactively considered for co-investment between industry and government. This includes on-ground/in-water control and development of model codes of practice to manage spread pathways.

Investing in research, development and extension for EPDNS

- In setting up an EPDNS approach, biological control must remain 'front and centre' as a cost-effective, broad-scale, self-sustaining means to address the impacts of established pests. Research, development and extension for biocontrol and other innovative methods of integrated control are high benefit:cost investments for government and industry for established pests – more so than just focusing on on-ground control programs for few, high priority assets in the landscape. In this regard it will be important to manage policy signals and stakeholder perceptions to ensure biocontrol programs for public good are well-supported and funded (e.g. introduction of new strains of rabbit haemorrhagic disease, redistribution of weed biocontrol agents).
- Broad community and industry benefits flow from peak body investment into research, development and its coordinated extension for addressing widespread EPDNS. Strategic innovation to advance control methods (including biocontrol and pesticide application technologies) and to build adoption of best practice are key drivers in individual landholders having the skills and capacity to do on-going management.
- Governments no longer have the capacity to lead on-ground activities at the local level to the extent they used to. Rather, it is a supporting role whereby government provides access to technical information and coordination amongst landholders, where warranted for a broader outcome. For example, highly mobile and cryptic pests (e.g. fox, wild dog) often require a whole of landscape approach, and government intervention is needed to achieve collective action across multiple land uses.

Asset-based protection

- Asset management involves consideration of how to deal with multiple threats, including multiple pests and/or diseases. A strict focus on EPDNS in asset-based protection may not result in the degree of expected environmental and/or economic outcomes.
- NRM in South Australia is having an increased focus on asset protection for targeting on-ground works, particularly with regards to environmental assets. NRM boards are now spending more investment on 'social mapping', to help determine assets of most value to the community. Asset-based protection needs to include social aspects, such as Aboriginal cultural significance.
- Asset protection for wildlife health, could, for example, be the establishment of an 'insurance population' of a threatened native animal species to protect it from an established disease.

Intersection of EPDNS and Threat Abatement Plans

- Currently, threat abatement plans (TAP) under the Environment Protection and Biodiversity Conservation Act (EPBC Act) seem to be a surrogate for national significance, although their focus is managing environmental impacts. A species should not have both a TAP and EPDNS plan, as this would confuse stakeholders and risk uncoordinated activities and investments. Rather, a TAP should be rolled into an EPDNS plan that would have a wider scope including primary production, where appropriate for particular species.

Multiple stakeholders for invasive species

- Market-drivers for industry investment in invasive species is challenging for many invasive species (weeds, pest animals, aquatic pests) as rarely do they have strict host-pathogen/parasite relationships as occur in plant and animal health. Rather, it is the norm that there are a range of land uses/aquatic systems affected by an invasive species, with varying degrees of impacts. This makes it challenging to have industry "buy-in", yet this is vital to have effective established pest management. Government continuing to subsidise pest control activities does not foster community and industry ownership of and responsibility for pest problems.

Scope to include marine and freshwater systems

- The discussion paper did not include marine and freshwater ecosystems, which also have significant pest and disease issues. This was perhaps an oversight as the Marine Pests Sectoral Committee is looking to determine species of national significance, and the Sub-Committee on Aquatic Animal Health is likewise considering aquatic animal diseases - both at the direction of the National Biosecurity Committee.
- The frequent use of the term 'landholder' is inappropriate for aquatic environments and production systems. For marine areas the government is the primary 'landholder'; an explicit definition of how this translates to marine-based regulation, management and government roles to 'act as a good neighbour' would be useful. For aquaculture, are lease and license holders considered to be the equivalent of landholders?
- Case studies regarding aquatic biosecurity would improve understanding on how the EPDNS policy framework would work in freshwater and marine systems.
- Risk creators include international and domestic vessel movements where there is biofouling or pest/disease contaminated ballast water, as well as biofouled vessels cleaned in-water (without adequate capture of waste).

Implementing and reviewing EPDNS plans

- Stakeholders need clear ownership of their aspect of the national plan. For coordinated action a common outcome needs to be set at the top (most inclusive) level, then each stakeholder group can set a goal that can support or feed into that overall outcome to be achieved. Every group must own its goal. A group that cannot devise such a goal is not a stakeholder group.
- A key issue for establishing collective action against a pest/disease is the readiness of industries and communities. Some industries are likely to be well-placed, however, not all stakeholders are equally 'ready' and many may not be receptive to collective action. The spectrum of fishing industries, and perhaps the recreational fishing industry, could be used/considered as a test case to look at how this policy would translate.
- For the WoNS, the Monitoring, Evaluation, Reporting and Improvement (MERI) planning process has added rigour to the setting of a goal and outcome hierarchy and to being able to subsequently measure the success of a plan's implementation.
- A key reason for the effectiveness of the former WoNS program was the role of national coordinators in over-sighting the implementation of national strategic plans. In the absence of such coordinators, there is a need to ensure there is genuine stakeholder commitment to resourcing and peer oversight of the implementation of EPDNS national strategic plans.
- Once declared a pest/disease of national significance, a national plan should be implemented through a five year program, which would allow sufficient time to develop and promote best practice measures and for these to take effect. After this period an EPDNS should be reviewed (technical review and public consultation) as to whether it stays listed as "nationally significant" and, if so, when the next review should be. There should be consistency within similar groups of pests/diseases about the frequency of such reviews (e.g. biannual), taking account of stakeholders involved and the species' biology.

- An EPDNS may continue to meet the three criteria of nationally significant, feasible and beneficial to be nationally coordinated. However, a further test of activities and outcomes would be needed. Is there nationally strategic work being done by multiple stakeholders? Is this being monitored to show that outcomes are being achieved, such as a measured reduction in the impact of a pest?
- A species should not stay listed as an EPDNS where the community no longer sees it as an issue and there is little or no government and/or industry support being put into its active management.
- A species should also not stay listed as an EPDNS where sufficient tools have been developed and provided to community/industry, such that the spread and impacts can be managed to an acceptable level (this requires further definition).

Avoiding perverse outcomes

- All stakeholders must be mindful of avoiding perverse outcomes from industry/market-driven approaches to pest management. A high economic value (or bounty) placed on a feral animal (e.g. goats, foxes) may foster retention of breeding herds and even deliberate (illegal) releases, such that environmental impacts are perpetuated. Guidelines for managing EPDNS must seek to have a triple bottom line approach.
- The implications of a focus on one pest needs to consider the flow-on impacts on other pests and native and agricultural species. For example, a long-term focus on fox baiting may lead to an increase in feral cats.

Editorial comments on the discussion paper

- The word 'practical' was used several times when the more appropriate word to use was 'practicable' (e.g. Section 3: National interest first dot point; !Industry and community groups fifth dot point; Risk creators question 7).
- Section 3, proposed policy principles last dot point 'regularly' is a word with no time frame. It should say: reviewed at appropriate intervals
- The definitions of "pest" and "disease" of 'to have a negative effect' seems to be a bit broad, and would benefit from some expansion such as adding "...on primary industries, natural environments, infrastructure, amenity and/or public health.
- The focus on "Exotic pests or diseases" doesn't take into account the pests that come from another part of Australia where they are not pests, but when they are transposed across broad geographical barriers they become pests e.g. bluebell creeper from WA in SA).

Yours sincerely



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