Question 1

The revised strategy sets out the roles and responsibilities of all stakeholders in pest animal management and prevention. Are these clear?
Question 2

Are the goals and priorities of the strategy focused in the necessary areas? why / why not?

Question 3

The strategy is intended to describe how pest animal management fits into Australia’s biosecurity system. Is the link between Australia’s biosecurity system and pest animal management made clear in the strategy? why / why not?

Comments / Feedback

Any other comments or feedback?

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Submission
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Dear Sir or Madam

Submission on the Australian Pest Animal Strategy 2017 to 2027: consultation draft

The New South Wales Fisheries Scientific Committee (FSC) wishes to comment on the Australian Pest Animal Strategy (APAS) 2017 to 2027: consultation draft (from herein referred to as APAS 2017-2027 consultation draft). The FSC, which is established under Part 7A of the Fisheries Management Act 1994 (FM Act), is responsible in New South Wales for functions relating to the listing of species, populations, ecological communities of fish and marine vegetation and key threatening processes as are conferred to it by the FM Act. The FSC also advises the Minister and the Natural Resources Commission on any matter relating to the conservation of threatened species, populations or ecological communities.

Pest animal management is not a central focus of the FSC, but it is relevant to the conservation of a variety of threatened freshwater fauna. One of the Key Threatening Processes listed by the FSC is "Introduction of fish to fresh waters within a river catchment outside their natural range". In addition, all of the listed threatened freshwater communities (e.g. the aquatic ecological communities in the lowland catchments of the Lachlan River; Darling River, lower Murray River catchment, and Snowy River in NSW) are impacted by a variety of aquatic pest species.

In 2005, the Invasive Plants and Animals Committee (IPAC, formerly the Vertebrate Pest Committee) expanded its scope to include responsibility freshwater pest fish. The inaugural Australian Pest Animal Strategy was published in 2007, soon after the Invasive Plants and Animals Committee took on this new responsibility for freshwater pests, and so it is somewhat understandable that fishes had no prominence in this inaugural strategy. However, more than a decade later from taking on responsibility for freshwater pest fishes, the FSC notes an almost total lack of reference to freshwater pests in the current consultation draft. There is very little indication to the readers of the new APAS 2017-2027 consultation draft that the IPAC has embraced and incorporated their decade-old responsibility for freshwater pest fishes into national pest management arrangements. This lack of explicit acknowledgement of freshwater pests in the revised strategy is even more striking given that the Freshwater Fish Expert Group (FFEG, a working group of IPAC) terms of reference state that its role is to:

a) coordinate and lead the implementation of the National Strategy for the management of ornamental fish in Australia;

b) develop, co-ordinate and lead the implementation of the National Freshwater Pest fish Strategy; and
c) coordinate and lead the development of national arrangements to identify, minimise, and address the freshwater invertebrate pest risk to Australia’s inland water environments and associated industries.

The average reader of the current APAS 2017-2027 consultation draft would have virtually no appreciation that its scope includes freshwater fishes as all of the examples and boxed text presented are terrestrial. This is even more surprising given the May 2016 Australian Government announcement of $15 million in funding over two and a half years to develop the National Carp Control Plan around a potential release of Cyprinid herpesvirus by the end of 2018.

It is of concern to the FSC that the information on the number of established introduced freshwater fishes presented in the introduction of the consultation draft is significantly outdated and incorrect. It appears to have been copied from the inaugural AP and was incorrect in 2007 when that document was published. Alien freshwater fishes is the most rapidly expanding vertebrate pest group in Australia, with at least nine additional species established since 2000 (Lintermans 2013). The Freshwater Fish Expert Group has developed a nationally-endorsed list of 38 alien freshwater fish species that have become established in Australia. This list was nationally agreed in 2014. The pathways of establishment of new introduced freshwater fishes are well established (the ornamental fish industry for new incursions, and 11 other pathways for spread within Australia (Lintermans 2004)). An increasing threat that is just emerging is hybridisation with translocated native species (particularly Rainbowfish (Melanotaeniidae) which are now threatening at least 3 small-range native, endemic rainbowfish species in Queensland.

There are numerous non-ornamental pest fishes in Australia. E.g. carp. Trout, Redfin perch, Tilapia, Gambusia, that lack national leadership in their management. The FSC is aware that a national Freshwater Pest Fish Strategy has been in draft form since 2012, but as this strategy seems unlikely to be completed in the near future, leadership in freshwater pest fish management must be guided by the APAS. Therefore, it is critical that stakeholders are aware that the new APAS in fact is the national leadership document for freshwater pest fishes.

The lack of consideration of freshwater fish issues is not just restricted to the current APAS 2017-2027 consultation draft; the 2014 revision of the Guidelines for the Import, Movement and Keeping of Non-indigenous Vertebrates in Australia, similarly ignored freshwater fishes some 9 years after fishes were included in the scope of IPAC. The continuing lack of explicit acknowledgement of national responsibility for freshwater pest fish management in IPAC products unfortunately reinforces the perception that there is still a national divide between terrestrial and freshwater pest management, and is a disservice to attempts to engage aquatic stakeholders in national pest approaches.

The FSC is broadly supportive of the high level principles of effective pest animal management and the goals of the strategy contained in the consultation draft but believes that the issues raised in the FSC’s submission highlight that some goals are likely to be compromised by the lack of transparency that the scope of the strategy does not include freshwater pests. For example. Goal 1: Improve leadership and coordination for the management of pest animals and Goal 3: prevent the establishment of new pest animal species will be difficult to achieve when freshwater stakeholders are unlikely to be aware of the strategy's relevance to the aquatic environment.
The FSC recommends that the APAS 2017-2027 tie amended slightly to explicitly acknowledge that n: now includes freshwater pest fish, and that this an increase in scope to the inaugural APAS. The addition of a case study on freshwater pest fish problems or management could then be included to demonstrate the relevance of the APAS. The FSC would be happy to assist, and believes that such minor changes to the document would significantly enhance freshwater stakeholder engagement and ownership of the APAS.

For further information regarding this correspondence, please contact the FSC’s Executive Officer, Maryrose Antico by phoning

Yours Sincerely,

Assoc. Prof. Mark Lintermans
Chairperson
Fisheries Scientific Committee
13 October 2016

References
