Question 1

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

The roles assigned to the Australian Government in the 'roles and responsibilities’ section are not reflected throughout the rest of the Strategy nor does it show the capacity of the Australian Government to fulfil any of these.

OEH recommends that the Strategy detail the Australian Government responsibilities in relation to meeting the goals and priorities listed within the strategy (and associated actions).

Question 2

Are the goals and priorities of the strategy focused in the necessary areas? why / why not?
The goals and priorities are fundamentally sound and align well to, and expand on Goals of the 2007-17 APAS. They are consistent with the goals and priorities of other national biosecurity agreements such as IGAB, and with state and territory biosecurity legislation and strategies.

However, the fundamental weakness of the strategy is that there are no actions, and therefore no mechanisms within the strategy to achieve the goals or address the priorities.

**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?*

The link between Australia’s biosecurity system and pest animal management (and the links to other strategies and frameworks) is made strongly throughout the draft Strategy. However, in the absence of actions or measures, it is unclear how the Strategy will add value to the biosecurity system.

OEH recommends that the Strategy identify pest animal actions linked to the wider biosecurity system.

**Comments / Feedback**

*Any other comments or feedback?*
About this submission

This submission has been prepared by the Office of Environment and Heritage (OEH), NSW.

OEH incorporates the NSW National Parks and Wildlife Service (NPWS). OEH is a significant stakeholder for pest animal management in NSW, with management undertaken on NPWS estate being nearly 9% of NSW (over 7 million ha). OEH participates in statewide pest animal planning in NSW through NSW’s Biosecurity Advisory Committee and the Pest Animal Council under the lead of the NSW Department of Primary Industries ( DPI). OEH also leads the response of managing pests that impact biodiversity across all tenure in NSW, which includes a research component, coordination role and on ground management.

The comments below relate to OEH’s interest in the Australian Pest Animal Strategy as the overarching guiding document for national coordination to drive the development of consistent and coordinated national approaches and to provide clarity around priorities, roles and responsibilities.

The submission consists of 3 parts:

a) The summary of OEH’s position on the draft Australian Pest Animal Strategy;

b) Comments addressing the 3 guiding questions detailed in the ‘how to make a submission’ statement within the Draft Strategy, and

c) Additional comments on each section of the strategy where the specific comment has not been addressed in response to the guiding questions.

a) Summary of Position

OEH believes that the Draft Australian Pest Animal Strategy (APAS) 2017-2027, while based on sound goals and priorities, loses the opportunity to progress or support strategic pest animal management in Australia or maintain the achievements attained under the previous strategy.

The most significant limitation of the document is the absence of actions and clear outcomes, and the failure to articulate specific needs to improve national biosecurity arrangements in relation to pest animals. This lack of specificity severely reduces the document’s usefulness to stakeholders, with no clear framework for accountability nor the ability evaluate and report on key actions. As such, this strategy provides limited ability to track long term progress in managing threats nationally.

OEH recommends that the draft strategy include specific measurable actions that identify and address the key challenges facing national strategic management, informed by the 2007 strategy review and the key learnings outlined in Appendix A.

b) see above.

c) Additional comments

Page 1 Overview

The term “landholders” is used throughout the report. It appears that this term is being used to describe managers of both private and public lands however this only becomes clear in the later part of the Strategy. The term “landholder” is more commonly used to identify private land managers.

OEH recommends that the term “landholders” needs to be more clearly explained/defined when initially used in the Strategy.

OEH also suggests a minor amendment for non-technical readers. On page 14, dot point 9: “work with people or groups that have the potential to create pest animal risks after the border (keepers of exotic species) to assist adoption of risk management measures as part of normal business practices”. It is suggested that ‘After the border’ be replaced with ‘post border’, as described on page 7 point 3.

Attach a document

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File: DOC16 512230-4 Attachment D - OEH submission to the Pest Animal Strategy(2).docx

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**Submission**

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- [ ] Yes
- [ ] No
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OEH recommends that the draft strategy include specific measurable actions that identify and address the key challenges facing national strategic management, informed by the 2007 strategy review and the key learnings outlined in Appendix A.

b) Comments on the three guiding questions

1. Are the roles and responsibilities of all stakeholders clear?
The roles assigned to the Australian Government in the ‘roles and responsibilities’ section are not reflected throughout the rest of the Strategy nor does it show the capacity of the Australian Government to fulfil any of these.

**OEH recommends that the Strategy detail the Australian Government responsibilities in relation to meeting the goals and priorities listed within the strategy (and associated actions).**

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**OEH recommends that the Strategy identify pest animal actions linked to the wider biosecurity system.**

c) **Additional comments**

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Contact for further information:
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