Question 1

The revised strategy sets out the roles and responsibilities of all stakeholders in pest animal management and prevention. Are these clear?
No. There are entirely too many descriptive words regarding the roles and responsibilities. There are also far too many dot points and that makes it hard to get a clear picture - it reads more as a manual for use in the field as opposed to providing a general overview to understand the goals of pest animal management and prevention, and how this will be done.

It would be of great benefit to see a breakdown in terms of layers of complexity for each stakeholder.

This means the roles and responsibilities of each stakeholder should be conveyed as a pyramid diagram, or colour coded diagram, with the simplest elements and the bottom and working toward the more unique or niche requirements at the top. This will allow easier assimilation of information and to provide a far better means of identifying common elements.

Before moving on to a new strategy however, the Government should take steps to ensure the existing strategy is correctly implemented otherwise this document will be nothing more than a change of words with little or no impact in the field. For example, state and territory governments are meant to provide positive support measures to the community, but tell me, in terms of rabbit biocontrol, how is releasing a virus without absolutely guaranteeing protection for valuable animals helping the community? Is that not of sufficient public interest to warrant serious concern? Clearly, the situation at hand dictates the answer is no and this needs to be changed given the message Government is trying to convey in this new strategy.

**Question 2**

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

No. Again, focus on rabbit biocontrol as one example for debate. A stated priority of the strategy, being 1.3 on page 20, is that research and development should have a long term focus. When it comes to RHDV, it is claimed that efficacy is reduced with time for a number of reasons, and so new strains are released in temporal cycles, leading to an overall non steady reduction in numbers. This means, of course, biocontrol needs to be replaced with something better. It is published that immunocontraception has had success rates of up to 100%, but was not employed due to concerns about long term viability. Is this not the same as using RHDV with it "boom-bust" cycles of efficacy? In other words, it's long term viability needs careful management for best effect otherwise it is of little use. And, various Government researchers dispute the history of alternative work such as immunocontraception when it suits them, leading to an inconsistent message, which in turn makes it hard to take documents such as the new strategy with any degree of seriousness.

If this Government is truly serious about its stated priorities and the descriptors that go with it, it will for example abandon rabbit biocontrol using viral means and focus on something much better, and much more forward looking, such as immunocontraception.

**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?**

Certainly not. Where does it indicate that before importing a virus for rabbit biocontrol, Government will ensure adequate protection exists for the valuable rabbit population BEFORE this virus arrives here? After all, if that virus becomes an "outbreak", such as RHDV2, measures need to be put into place to ensure it can be isolated, contained and possibly eradicated.

The take home message is this - where does it say in the strategy that Australia's biosecurity system may need to be employed because of potential impact and problems with the pest animal management measures themselves? As far as I can see, it does not, but must to ensure open, honest and transparent communication with the public.
Any other comments or feedback?

Clearly, real world evidence shows that Government is not acting in a responsible way when it comes to pest animal management, with the theme of my response being rabbit biocontrol.

So, if history repeats, why is this strategy document necessary when most of it will be ignored when convenient to the Government?

The document is not sufficiently comprehensive nor does it convey a simple yet accurate message. There are too many layers of managerial and political words but little to indicate how this translates into successful pest animal management.

I would be happy to engage further with you on this matter.

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Submission

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