



Australian Government
**Cotton Research and
Development Corporation**

12 October 2016

Department of Agriculture and Water Resources

Australian Pest Animal Strategy and Australian Weeds Strategy, 2017-2027

Dear Sir/Madam,

Introduction

Cotton Australia and the Cotton Research and Development Corporation (CRDC) welcome the opportunity to provide a submission on behalf of the Australian cotton industry, in response to the Australian Pest Animal Strategy 2017-2027 and Australian Weeds Strategy 2017-2027.

Cotton Australia is the key representative body for Australia's cotton growing industry. CRDC is the statutory authority for the cotton industry under the Primary Industries Research and Development Act (1989). These two organisations work closely together to create a more profitable, sustainable and dynamic industry for Australia's 1,200 cotton growers.

The Australian cotton industry recognises a need to work with the federal, state and territory governments as well as other industry organisations, to help reduce the potential for incursions and spread of plant pests that could adversely impact on production, domestic and international trade and the regional economy and the environment. Weeds and animal pests have a significant impact on the profitability and sustainability of cotton farms, including riparian areas and native vegetation areas managed by cotton growers.

Executive Summary

Industry assurance for biosecurity preparedness and responsiveness is primarily delivered through investment in RD&E and the cotton industry's best management practice program, myBMP. Management of area-wide issues such as pest animals and weeds transcends any one commodity or landholder and as such the coordination and leadership is required at a national level to deliver against biosecurity outcomes.

Cotton Australia and CRDC welcome the Australian Weeds Strategy and the Australian Pest Animal Strategy, to provide national guidance on best practice for management of weeds and pest animals.

Cotton Australia and CRDC recommend that these two draft strategies be revised to provide greater clarity for the roles and responsibilities of stakeholders, the goals and priorities of the strategies, and linkages across the biosecurity continuum as follows:

Recommendation 1. Cotton Australia and CRDC recommend that the roles and responsibilities of industry and landholders for weed and animal pest management be clarified by providing additional guidance on both strategies including;

- a. A detailed process for how leadership and coordination will be provided;
- b. Clarification for alignment with the National Biosecurity RD&E Strategy; and
- c. Clarification for alignment of outcomes, capacity, and capability with other frameworks/strategies/plans along the biosecurity continuum.

Recommendation 2. Cotton Australia and CRDC recommend that provisions be made to continually review the strategy to deliver a dynamic framework for responding to emerging issues throughout the biosecurity continuum, thus ensuring that the strategy remains relevant, addresses emerging issues and effectively delivers against the goals and priorities of each strategy.

Recommendation 3. Cotton Australia and CRDC recommend that clarification is provided for the linkages between Australia's biosecurity system and area-wide management of herbicide resistant weeds under the Australian Weeds Strategy.

Australian Pest Animal Strategy and Australian Weeds Strategy, 2017-2027

Question 1. Do the strategies make clear, all stakeholder roles and responsibilities?

The Australian Biosecurity arrangements are complex with multiple interactions at many levels between multiple entities. The weeds and animal pests strategies provide an attempt to provide leadership and coordination well beyond any initial incursion, with target pests frequently long-established and often widespread in the Australian environment.

The animal pest and weed strategy documents reference coordination and leadership in biosecurity preparedness and responsiveness as key pillars of the strategy. However, neither strategy provides sufficient detail on how this will be achieved. Detailed guidance on leadership and coordination under this strategy is essential for clearly defining the roles and responsibilities of industry and landholders, where area-wide issues including pest animal and weed management transcend any one particular crop or farm. The need for clear leadership and coordination in this already crowded space echoes the broader biosecurity challenges more broadly.

The cotton industry advocates for a risk-aligned and science-based biosecurity system to protect Australian agriculture, natural environments, and the wider community. Revision of the weeds and pest animal strategies to provide clarification regarding the engagement of funding bodies and coordination for research, development, and extension would allow the industry to understand better how RD&E investment decision in weed or pest animal research can deliver toward shared biosecurity outcomes. Linkages with the National Biosecurity RD&E strategies should be made explicit within both the weeds and pest animal management strategies.

The context for the Australian Pest Animal Strategy and Weeds Strategy is clearly outlined in Figure 2 for both guidance documents. However, clarification for how and where these strategies and frameworks align regarding outcomes, capability, and capacity would provide greater clarity for industry to define its roles and responsibilities under each of the strategies. Alignment with the National Plant Biosecurity RD&E Strategy should also be considered for Figure 2.

Recommendation 1. Cotton Australia and CRDC recommend that the roles and responsibilities of industry and landholders for weed and animal pest management be clarified by providing;

- a. A detailed process for how leadership and coordination will be provided;
- b. Clarification for alignment with the National Biosecurity RD&E Strategies; and
- c. Clarification for alignment of outcomes, capacity, and capability with other frameworks/strategies/plans along the biosecurity continuum.

Question 2. Are the goals and priorities of the strategies focused in the necessary areas?

The vision, goals and priorities of the pest animal and weeds strategies broadly align with the biosecurity priorities of the cotton industry. For cotton, these priorities are delivered through the industry's best management practice program (myBMP), which is facilitated by strategic RD&E investment. Although both strategies clearly articulate the goals for pest animal and weed management, further clarification is sought from industry on how progress against these goals will be assessed and assured. Guidance for the process for implementation of coordinated data collection including collation, synthesis, review, decision making and reporting against outcomes would provide greater transparency to industry that provisions were made to continually assess whether the goals and priorities of the strategies were focused in the necessary areas.

The Australian Weeds Strategy recognizes a gap in national emergency arrangements for managing incursions of exotic weeds of agricultural significance. The linkages between a formal agricultural weed response agreement and area-wide management for weeds considered under this agreement should form part of the Australian Weeds Strategy; once these frameworks are finalized. As such, the cotton industry calls for provisions to amend the strategy prior to 2027, to ensure it remains current, relevant and effective.

Recommendation 2. Cotton Australia and CRDC recommend that provisions be made to continually review the strategy to deliver a dynamic framework for responding to emerging issues throughout the biosecurity continuum, thus ensuring that the strategy remains relevant, addresses emerging issues and effectively delivers against the goals and priorities of each strategy.

Question 3. Do the strategies make clear, the link between Australia's biosecurity system and management of weeds or pest animals?

The strategies provide clear linkages between Australia's biosecurity system and the management of weeds and pest animals. However, it is unclear as to whether the Australian Weeds Strategy includes provisions for linking Australia's biosecurity system with area-wide management of endemic weeds that are resistant to one or more groups of herbicide products. Herbicide resistance is a growing issue for management of endemic weeds in agricultural and non-agricultural (e.g. roadside) areas and requires genuine coordination and strategy.

Recommendation 3. Cotton Australia and CRDC recommend that clarification is provided for the linkages between Australia's biosecurity system and area-wide management of herbicide resistant weeds under the Australian Weeds Strategy.

Conclusion

Cotton Australia and CRDC considers that the Australian Pest Animal Strategy and Australian Weeds Strategy provide an overarching framework for guidance on best practice weed and pest animal management. However, a dynamic biosecurity strategy is required to deliver on outcomes given the fluid biosecurity continuum in Australia. As such, the cotton industry advocates for provisions within the strategy for continual review, assessment, amendment and reporting to ensure that these strategies continue to provide stakeholder guidance in a changing environment.

Cotton Australia and CRDC look forward to working with the Department of Agricultural and Water Resources to improve leadership and coordination for biosecurity preparedness and responsiveness for weeds and pest animals of agricultural significance. The CRDC currently has substantial investments in pest and weed management and is a ready and willing collaborative partner to co-invest with the Department of Agriculture and Water Resources in matters of plant biosecurity.

Cotton Australia and CRDC would welcome an opportunity to provide further information on its position. For more information, contact Nicola Cottee, Policy Officer, Research Direction and Stewardship on

Yours sincerely,



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Australian Government
**Cotton Research and
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Additional questions

Is this submission confidential? No

Can this submission be published on this website? Yes

Do you consent for the department to contact you about your submission if required? Yes

Stakeholder groups:

- CRDC - Commonwealth Agency.
- Cotton Australia - Industry Organisation.

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