



NFAEP End of Tranche 1

Assurance Gate 0 Strategic Review

Queensland Department of Primary Industries

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→ The Power of Commitment



Photo credit: National Fire Ant Eradication Program

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Executive summary

GHD Pty Ltd (GHD) was engaged by the Queensland Department of Primary Industries (QDPI) to undertake an Assurance Gate 0 Strategic Review of the National Fire Ant Eradication Program (NFAEP). The review comes at the end of Tranche 1 of the NFAEP (the period 2023-24 to 2024-25) of the Fire Ant Response Plan 2023-2027.

Gateway reviews allow major programs such as the NFAEP to be independently examined at key decision points. They intend to help identify opportunities to improve the delivery of programs to ensure the best possible outcome is achieved.

This report is a snapshot of the NFAEP at the time of the review. It reflects the views of the independent review team based on information provided and evaluated. The content of this report will not ensure success. Gated assurance reviews will identify factors that are, or are likely to be, putting the program's success at risk. They do not replace the need to conduct risk identification, analysis, other review, health check or audit activities.

This report is subject to, and must be read in conjunction with, the limitations set out in Section 1 and the assumptions and qualifications contained throughout the report.

Review Approach

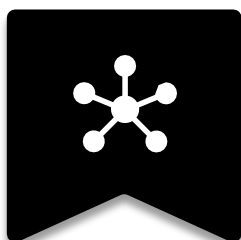
The review was informed by an evaluation of Program documents and materials as well as targeted consultation with NFAEP stakeholders. GHD reviewed over 170 Program documents provided via a Request for Information to QDPI, completed targeted interviews with 8 key stakeholders, and facilitated 4 stakeholder workshops across Government (35), Industry (20), Community (18), and Research and Innovation (3) groups.

The document review and stakeholder engagement was structured to seek feedback on Program strengths, weaknesses and opportunities for improvement against the following Gate 0 review themes:

1. Policy and Business Context
2. Business Case and Stakeholders
3. Management and Delivery of Outcomes
4. Risk Management
5. Readiness for the Next Phase.

Review Findings

A summary of key findings against each review theme is provided below.



Policy and Business Context

While the Program's vision that 'Australia is free from red imported fire ants by 2032 to protect our ecosystems, industries, economy and way of life' is generally understood and widely supported, the Program has lacked a clear statement of objectives and outcomes, and there is need to consolidate how past recommendations have been carried forward.



Business Case and Stakeholders

Overall, stakeholders continue to support the Program. While governance forums are robust, more efforts need to be made around clarifying their accountabilities, touchpoints and level of wider stakeholder participation. This reinforces the need for clear, consistent and proactive messaging that is easily understood by all stakeholders.



Management and Delivery of Outcomes

Measurability of the Program has improved, however there are still enhancements that could be made to further streamline the ease, speed and transparency of reporting. Progress shows an upwards trend in surveillance and compliance, but treatment against targets is lagging.



Risk Management

Risk management is somewhat static and lacks a continuous process throughout the various governance bodies. There is a need to continue to build risk literacy, including around the risk triggers and what constitutes effective risk management.



Readiness for the Next Phase

The Program continues to build momentum but funding uncertainty beyond 2027, coupled with a lack of a business case and a tailored Target Operating Model (TOM) to support it in the long term, is jeopardising key Program areas like resourcing and procurement. While it appears there is an underspend, there is a need to further address progress in treatment targets.

The review findings support an overall **'Amber'** rating of delivery confidence by the independent review team.

This rating has been determined based on an in-depth investigation of the materials and is supported by stakeholder consultation and subsequent analysis, with overall findings evidencing that:

- Successful delivery of the NFAEP appears to be still feasible when considering the direction and planned outcomes of the Program
- There is strong support for the Program across key stakeholders
- Sufficient funding is available to meet planned expenditure for the remainder of the Response Plan 2023-27
- The Program is generally progressing towards its vision of eradication.

However, significant issues exist, which require attention to ensure that the Program progresses effectively, better aligns to Program targets and goals, and strengthens community trust. These appear resolvable at this stage and, if addressed promptly, should not impact the realisation of benefits. Ongoing funding continuity is critical to ensuring identified issues can be addressed in a timely way.

Summary of Recommendations

The review team has formed a series of recommendations, which are summarised below. To assist with priority setting, and as per the Queensland Government's Gateway Review Guidebook, each recommendation has been assigned one of the following ratings:

Recommendation Rating	Description
Critical (Do now)	To achieve success, the recommendation should be actioned immediately.
Essential (Do by)	The recommendation is important, but not urgent. Take action before further key decisions are taken.
Recommended (Good practice)	The Program would benefit from the uptake of this recommendation.

#	Recommendation	Rating
1	Finalise the integration of the State of the Program (SoP) into the Response Plan 2023-2027 supported by the publication of a Performance Management Framework that documents the Program Logic and provide a clear line of sight between Program planning, measuring and monitoring performance, and reporting.	Critical
2	Incorporate relevant recommendations from previous reviews into the Performance Management Framework to improve transparency of the Program's response and to streamline reporting processes.	Essential
3	Integrate the Fire Ant Suppression Taskforce (FAST) into the Performance Management Framework by clearly communicating the scope of FAST and the scope of the NFAEP, highlighting areas of overlap, distinctions and complementarities. This should be supported by communications materials to aid public messaging.	Essential
4	Continue to strengthen the Consultative Committee's technical advisory role, as outlined in its Terms of Reference (ToR), including through the use of expert panels to enhance technical and scientific guidance for the Program.	Essential
5	Clarify the governance structures that support the recent operational re-alignment including key responsibilities and accountabilities, escalation pathways, change control and risk management, to facilitate improved responsiveness in Program delivery and more agile decision-making.	Critical
6	Consider establishing a National Stakeholder Reference Group made up of key representatives from across industry, community and the research and innovation sector as a forum to improve transparency, strengthen engagement and promote collaboration.	Recommended
7	Develop an expedited approval framework for releasing and publishing Program communications to external stakeholders. This framework should be streamlined to support the Program team and allow for effective Program autonomy.	Recommended
8	Ensure progress is reported against outcomes not just activities/outputs with appropriately agreed Key Performance Indicators (KPIs).	Essential
9	Prioritise system and process improvements to ensure the timeliness, efficiency and transparency of Program planning, monitoring and reporting.	Recommended
10	Use insights from Program reporting to inform and guide how the communication and engagement strategy is delivered, e.g., highlighting success stories and positive community interactions.	Recommended
11	Finalise the detection response framework to enhance the Program's ability to respond effectively to detections and operational challenges.	Essential
12	Continue to develop the Program's innovation framework and capability which will be necessary to identify ongoing solutions for more efficient and effective treatment and surveillance.	Essential
13	Further empower the Risk Management and Assurance Committee (RMAC) in its role in the Program's governance structure to ensure proactive rather than reactive risk management.	Essential
14	Improve the clarity of risk triggers by better articulating thresholds for action, tolerances and adaptability mechanisms beyond the immediate response plan and current threat profile.	Critical

#	Recommendation	Rating
15	Strengthen financial reporting to include budget reforecasting capability to give assurance that future Program activities remain within the overall budget envelope and that key underlying assumptions (e.g. treatment cost per ha) still hold.	Critical
16	Prioritise finalising and implementing the Program's strategic workforce plan to ensure that the Program has the skills, capacity and strategies in place to address gaps and meet long-term objectives.	Critical
17	Continue with the planned establishment of a dedicated strategic systems team in 2025-26 to refocus resources on the Program's IT strategy to address long-term technology needs and enhance system capabilities.	Essential
18	Prioritise work to commence the development of the next Response Plan (beyond 2027) by incorporating specific actions into the Work Plan for 2025-26. This is necessary to ensure early engagement with jurisdictions and the timely identification and delivery of key inputs needed for the development of the supporting business case.	Critical
19	Leverage the newly integrated Response Plan (2023-27) and Performance Management Framework (refer Recommendation 1) to inform the development of a business case and target operating model for the next Response Plan (beyond 2027).	Critical

Abbreviations

ADKAR	Awareness; Desire; Knowledge; Ability; Reinforcement (Change Management Framework)
AMM	Agriculture Ministers Meeting
BCS	Business Case and Stakeholders
BQ	Biosecurity Queensland
COPG	Contingency Options Planning Group
DAFF	Department of Agriculture, Fisheries and Forestry (Federal Government)
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
FAST	Fire Ant Suppression Taskforce
KPI	Key Performance Indicator
MDO	Management and Delivery of Outcomes
MSP	Managing Successful Programs (Program Management Framework)
NBS	National Biosecurity Strategy
NEBRA	National Environmental Biosecurity Response Agreement
NFAEP	National Fire Ant Eradication Program
NFAEP CC	NFAEP Consultative Committee
NFAEP SAG	NFAEP Scientific Advisory Group
NMG	National Management Group
PBC	Policy and Business Context
QLD DAF	Queensland Government Department of Agriculture and Fisheries
QLD DPI	Queensland Government Department of Primary Industries
RIFA	Red Imported Fire Ant (<i>Solenopsis invicta</i>)
RM	Risk Management
RMAC	Risk Management and Assurance Committee
RMSC	Risk Management Sub-Committee
RNP	Readiness for Next Phase
RSS	Remote Sensing Surveillance
SC	Steering Committee
SEQ	South-East Queensland
SoP	State of the Program
TOM	Targeted Operating Model
ToR	Terms of Reference

Contents

Abbreviations	vi
1. Review information	1
1.1 Program background	1
1.2 Review background and purpose	1
1.3 Scope and limitations	2
2. Approach to the review	3
2.1 Assurance framework	3
2.2 Delivery confidence assessment criteria	3
3. Review findings	4
3.1 Policy and business context	4
3.1.1 Alignment of outcomes and objectives with the overall strategy	4
3.1.2 Progress from previous reviews	6
3.1.3 Alignment with FAST	7
3.2 Business case and stakeholders	7
3.2.1 Governance arrangements	7
3.2.2 Linkages and collaboration with other government programs	10
3.2.3 Stakeholder support for the Program	11
3.3 Management and delivery of outcomes	12
3.3.1 Performance monitoring and reporting	12
3.3.2 Progress toward outcomes	13
3.4 Risk management	14
3.4.1 Identification and management of Program risks	14
3.5 Readiness for next phase	15
3.5.1 Program budget and financial management	15
3.5.2 Mobilising the Program's resources	17
3.5.3 Ongoing need for the Program	18
4. Conclusion and recommendations	20
4.1 Delivery confidence assessment rating	20
4.2 Summary of recommendations	20

Table index

Table 1 Red, Amber or Green (RAG) Criteria Descriptions	3
Table 2 Actions identified as needing to be implemented in 2024-25 (Source: State of the Program)	4
Table 4 NFAEP governance roles and responsibilities, as determined by each forum's Terms of Reference (ToR)	8
Table 5 Budget Outcomes 2023-24 and 2024-25	16
Table 6 Summary of key findings and recommendations	21

1. Review information

1.1 Program background

The National Fire Ant Eradication Program (NFAEP) was established in 2001 following the detection of *Solenopsis invicta* (red imported fire ant) in western Brisbane and the Fisherman Islands. It is a nationally cost-shared initiative funded by the Australian, state and territory governments, and delivered by Biosecurity Queensland (BQ) within the Queensland Department of Primary Industries (QDPI).

By 2017, governments had invested \$367 million in eradication efforts. A further \$411.4 million was committed under the 10-Year Eradication Plan (2017–2027) to eliminate fire ants from Queensland. In 2021, an Independent Strategic Review assessed the first four years of the plan and recommended a more comprehensive approach, focusing on stronger containment and aggressive suppression to prevent the spread of fire ants beyond South-East Queensland (SEQ).

In line with the Independent Strategic Review's preferred option (Option A), the Fire Ant Response Plan 2023–27 was developed to strengthen eradication treatment, compliance, and surveillance. Approved at the Agriculture Ministers Meeting (AMM) in July 2023, the plan builds on lessons from previous efforts and implements the 2021 Independent Strategic Review's key recommendations.

In May 2024, the State of the Program (SoP) was developed in response to significant delays in the early stages of delivering the Response Plan 2023–27. The SoP serves as an implementation and adjustment framework for the Response Plan 2023–27. Taken together, both documents have been designed to support the implementation of the NFAEP's vision:

Australia is free from Red Imported Fire Ants by 2032 to protect our ecosystems, industries, economy, and way of life.

The NFAEP governance structure was established to provide tailored oversight, accountability, and risk management for the Program. To support these principles, the NFAEP governance model was updated in February 2024 to align more with national best practices such as the National Environmental Biosecurity Response Agreement (NEBRA) whilst adapting them to Queensland's specific needs. The current governance model replaces previous committees like the National Steering Committee (NSC) with the NFAEP National Management Group (NFAEP NMG), comprising representatives from Australian, state and territory governments. Oversight is further supported by bodies such as the NFAEP Consultative Committee (NFAEP CC), the NFAEP Risk Management and Assurance Committee (NFAEP RMAC), as well as the Program Board.

1.2 Review background and purpose

An Assurance Strategic Review is a short, independent review, allowing major programs like the NFAEP to be independently examined at key decision points¹. Program reviews are carried out under a Gate 0: Strategic assessment process and may be repeated more than once throughout a program's lifetime. These reviews aim to help identify opportunities to improve delivery and ensure the best possible outcome is achieved. The benefits lie in the review team bringing a fresh perspective to identify risks and issues facing the program.

Importantly, Gate 0 reviews are not designed to be an audit, technical review or an inquiry, but rather a review of an entire program together with its constituent parts, investigating its direction and planned outcomes. As part of this review, a final Delivery Confidence Assessment is required to be provided by the independent review team. More details of the assessment criteria are provided in Section 2.2.

GHD was engaged by QDPI to undertake an Assurance Gate 0 Strategic Review of the NFAEP. The review comes at the end of Tranche 1 of the NFAEP (the period 2023–24 to 2024–25) of the Fire Ant Response Plan 2023–2027. This report outlines the key findings and recommendations from the Assurance Gate 0 Strategic Review conducted by GHD between September and November of 2025.

The scope and limitations of the review are further detailed in Section 1.3.

¹ Source: https://www.treasury.qld.gov.au/files/Gateway-Review-Guidebook_20201.pdf

1.3 Scope and limitations

The scope of the review, as specified by QDPI in the Terms of Reference (ToRs), was to:

- Confirm that the outcomes and objectives for the Program (and the way they fit together) make the necessary contribution to the overall strategy
- Ensure that the Program is supported by key stakeholders
- Review the arrangements for leading, managing and monitoring the Program as a whole and the links to individual parts (e.g. to any existing projects in the Program's portfolio)
- Review the arrangements for identifying and managing the main Program risks (and the individual project risks), including external risks such as changing business priorities
- Check that provisions for financial and other resources had been made for the Program (initially identified at Program initiation and committed later) and that plans for the work to be done through to the next stage are realistic, properly resourced with sufficient people of appropriate experience, and authorised
- Check progress against plans and the expected achievement of outcomes
- Check that there is engagement with the market as appropriate on the feasibility of achieving the required outcome
- Where relevant, check that the program takes account of joining up with other programs, internal and external
- Evaluate actions taken to implement recommendations made in any earlier assessment of deliverability, including the recommendation made in the 2021 Independent Strategic Review (as the 2023-27 Response Plan was developed to support the implementation of the recommendations of the 2021 review).

The review did not consider:

- Deliverables in scope for the Fire Ant Suppression Taskforce (FAST)
- Assessment of technical feasibility of eradication
- Cost benefit analyses of Program options
- Consideration of alternative options to eradication.

2. Approach to the review

2.1 Assurance framework

The review was guided by the development of an assurance framework developed by GHD, which was agreed with QDPI to ensure consistency with the Queensland Government's Gateway review process guidelines² and tailored to the review ToRs (provided in Section 1.3).

The review was informed by the provision of Program documents and materials as well as by targeted consultation with NFAEP stakeholders. GHD reviewed over 170 Program documents provided via a Request for Information (RFI) to QDPI, completed targeted interviews with 8 key stakeholders, and facilitated 4 stakeholder workshops across Government (35), Industry (20), Community (18), and Research and Innovation (3) groups.






In summary, the document review and stakeholder engagement was structured to seek feedback on Program strengths, weaknesses and opportunities for improvement against the following review themes:

- Policy and Business Context
- Business Case and Stakeholders
- Management and Delivery of Outcomes
- Risk Management
- Readiness for the Next Phase.

2.2 Delivery confidence assessment criteria

A Gate 0 review requires that an overall Delivery Confidence Assessment be determined by the review team for the program. This Delivery Confidence Assessment considers the Program's ability to deliver outcomes against its agreed objectives, and whether it will be delivered to time, cost, scope and quality. Consistent with the Queensland Government's Gateway Review Guidebook¹ confidence was assessed based on a five-point scale as outlined in Table 1.

Table 1 Red, Amber or Green (RAG) Criteria Descriptions¹

RAG	Criteria description
 Green	Successful delivery to time, cost and quality appears highly likely and there are no major outstanding issues that at this stage appear to threaten delivery significantly.
 Amber/Green	Successful delivery appears probable, however constant attention will be needed to ensure risks do not materialise into major issues threatening delivery.
 Amber	Successful delivery appears feasible, but significant issues already exist requiring management attention. These appear resolvable at this stage and, if addressed promptly, should not impact delivery or benefits realisation.
 Amber/Red	Successful delivery is in doubt with major risks or issues apparent in a number of key areas. Prompt action is required to address these and establish whether resolution is feasible.
 Red	Successful delivery appears to be unachievable. There are major issues which at this stage, do not appear to be manageable or resolvable. The project may need re-baselining and/or overall viability re-assessed.

2 Source: https://www.treasury.qld.gov.au/files/gate-0-strategic-assessment_2020.pdf

3. Review findings

3.1 Policy and business context

Summary of findings

While the Program’s vision that ‘Australia is free from red imported fire ants by 2032 to protect our ecosystems, industries, economy and way of life’ is generally understood and widely supported, the Program has lacked a clear statement of objectives and outcomes, and there is need to consolidate how past recommendations have been carried forward

3.1.1 Alignment of outcomes and objectives with the overall strategy

The review found that the NFAEP’s vision that ‘Australia is free from Red Imported Fire Ants by 2032 to protect our ecosystems, industries, economy and way of life’ is generally understood and widely supported. This ambition is backed by a significant national investment across all jurisdictions, including substantial Commonwealth funding, reflecting a shared commitment to biosecurity outcomes.

However, while the overall strategic direction is broadly supported, several issues have emerged regarding how the Program’s specific objectives have been articulated, interpreted and operationalised.

Stakeholder feedback and document review suggest that clarity and coherence between objectives may be lacking. This ambiguity appears to have hindered the Program’s ability to track progress against objectives and communicate its intent effectively. It also suggests a need for more precise and measurable objectives, supported by defined handover points and metrics, including to justify transitions between suppression and eradication phases.

Approved in May 2024, the SoP was developed to address some of these concerns by translating the strategic intent of the Response Plan 2023-27 into operational action. It introduces more clearly stated strategic objectives and outcomes, revised KPIs, annual workplanning and reporting. The SoP highlights that the transition was to be supported by internationally recognised frameworks such as Managing Successful Programs (MSP) and the Awareness; Desire; Knowledge; Ability; Reinforcement (ADKAR) change management model, which were intended to help strengthen delivery and accountability.

Table 2 provides an example of how annual actions are aligned with the revised strategic objectives as outlined in the SoP.

Table 2 Actions identified as needing to be implemented in 2024-25 (Source: State of the Program)

Strategic Objective	FY 25 Actions
Strengthening the Biosecurity System	<ul style="list-style-type: none"> - Establish a scientific research agenda that leverages collaboration and builds evidence about eradication - Build community and industry understanding about their General Biosecurity Obligation and support their capability to act with effect - Build and diversify the partnership profile that extends the reach of the eradication effort - Build a responsive workforce that imports scientific and intelligence expertise and builds enforcement skills
Prevent the Spread	<ul style="list-style-type: none"> - Direct knowledge and innovation investment to building eradication effectiveness (success in effort) and efficiency (success in treatment regime) - Build an escalated and targeted regulatory model that promotes voluntary compliance but enforces obligations and holds actors to account - Diversify treatment approaches to meet community/industry profiles
Detect the Threat	<ul style="list-style-type: none"> - Build genetic testing capability, focussing on timeliness and accuracy

Strategic Objective	FY 25 Actions
	<ul style="list-style-type: none"> - Build the community and industry role in detection - Establish data analytics, predictive weather modelling and risk-based and intelligence techniques that support eradication - Build a confident and competent workforce ready for mobilisation in response to an escalated threat - Profile and target industries and/or communities that escalate the threat level because of non-reporting, non-compliance, and/or type of activity undertaken
Treat to Eradicate	<ul style="list-style-type: none"> - Innovate baiting and delivery approaches to build eradication efficacy and extend opportunities to address uncontrollable events - Equip community and industry with the capability to effectively treat for eradication - Adopt a risk-based approach to eradication, leveraging intelligence and data analytics to prioritise
Move-in	<ul style="list-style-type: none"> - Diversify capability for surveillance to efficiently and effectively provide an acceptable level of confidence that an area is free from fire ants

To date however, the SoP has not been formally integrated into the Response Plan 2023-27. As a result, it is not always clear which actions are being continued or discontinued from both documents. There is a risk that this may limit continuity and transparency in proactive strategic planning, and design and delivery. There is also evidence to suggest that KPIs still remain undefined and difficult to measure.

Further, while referenced in the SoP, the implementation of the MSP and ADKAR frameworks do not appear to have been appropriately resourced or integrated. Evidence of their expected benefits are therefore limited. The review team finds that not all elements of MSP and ADKAR may be well-suited for this Program, though some MSP elements may be useful. Specifically, “Learning from Experience” “Designing and Delivering a Coherent Capability”, “Focusing on Benefits and Threats” and “Envisioning and Communicating a Better Future” appear the most relevant to take forward, given these are supported elsewhere in this review’s analysis as change management priorities. ADKAR focuses on supporting individual change management. This would be best addressed by strengthening support systems and processes as recommended elsewhere in this review. Over-fixation should not be given to implementing MSP and ADKAR at this stage but rather working to achieve indirectly via consolidating existing governance frameworks (refer Section 3.2.1).

The SoP improves clarity around the Program’s objectives and outcomes, however, evidence suggests that messaging is not consistently applied. By way of example, the phrase “*Kill the Ants, Not Ourselves*” has appeared in Program materials but is not a goal or objective that is listed in the Response Plan 2023-27 or the SoP. This example of inconsistent messaging was raised by stakeholders in consultation, as it appears to have jarred with community values. Some considered its use to be confrontational and imply that current actions are self-destructive, which may also reinforce and perpetuate the misinformation relating to the Program being harmful to communities and the environment (explored further in Section 3.2.3). While not consistently featured across Program materials online or internally, there is still value in acknowledging this type of example of misalignment and the need to ensure a more coherent Program vision and objectives statement.

Clarity of strategic objectives and outcomes has also been hindered by the inability to publish the Response Plan 2023-27 and significant delays in publishing annual workplans and reports. While the Cabinet-in-Confidence nature of the full Response Plan 2023-27 might restrict its use in the public domain, there is opportunity to publish a simple ‘plan-on-a-page’ type document that summarises the logic for how the Program’s activities and resources are being used to achieve its strategic objectives and long-term outcomes.

Despite these challenges, there remains strong support for the Program’s intent, and recent improvements in planning and reporting processes deserve recognition. The introduction of the SoP provides an improved basis for aligning planning with the principles, priorities, actions and performance of the Program supported by revised governance structures, evidencing a positive shift toward a more adaptive Program model.

#	Recommendation
1	Finalise the integration of the State of the Program (SoP) into the Response Plan 2023-2027 supported by the publication of a Performance Management Framework that documents the Program Logic and provide a clear line of sight between Program planning, measuring and monitoring performance, and reporting.

3.1.2 Progress from previous reviews

As outlined in Section 1.1, the Response Plan 2023-27 was formed in response to the findings of an Independent Strategic Review commissioned in 2021 by the then NFAEP Steering Committee. Approved at the AMM in July 2023, the Response Plan 2023-27 provides the inter-jurisdictional funding commitment and plan at the national level detailing how the 2021 Independent Strategic Review’s key recommendations would be taken forward and implemented.

In addition to the key recommendation around the establishment of FAST, recommendations taken forward included structured and strategic efforts to:

- Strengthen the Program’s governance model
- Implement change management
- Increase public communications presence and targeted communications messages
- Expand treatment, surveillance and compliance efforts
- Increase funding commitments.

Despite AMM approval of the Response Plan 2023-27, and in addition to NFAEP annual workplanning and reporting, the Program is required to continue to separately document and report on progress toward the 2021 Independent Strategic Review recommendations. Evidence shows that status updates were made in December 2022, February 2024, August 2024 and April 2025 across all 27 recommendations. At the last update in April 2025, 18 of the 27 recommendations had been adopted, 5 partially adopted and 3 noted. The remaining recommendation was not carried forward due to overlap with another. Of those adopted or partially adopted (23 total), 5 were delivered, 16 were in progress to varying degrees, and 2 were delayed.

In addition to the 2021 Strategic Review, the NFAEP Program has been subject to several other reviews, including by the Queensland Audit Office as part of its 2023 Managing Invasive Species report, and the 2024 Australian Senate Inquiry into RIFA in Australia. As a result, the Program responds and reports on a large number of recommendations, indicating significant administrative complexity.

Despite the status updates to major reviews being made publicly available, these are provided across multiple documents. In addition to adding to the Program’s reporting burden, the review found through consultation that stakeholders still perceive limited visibility of progress and, as a result, many stakeholders feel they do not fully understand how the Program is managing improvements and change. This is likely exacerbated by the fact that the Response Plan 2023-27 has not been made public. Although stakeholders perceived improved progress, they were unable to clearly identify the actions or mechanisms that led to these improvements, with general sentiment indicating “it’s clear there are improvements, but it’s hard to know what actually led to those”. This again speaks to the need for clearer reporting channels.

In summary, the review found that, although the NFAEP has taken meaningful actions to implement recommendations from prior reviews, the effectiveness of these actions varies. There is opportunity to streamline the Program’s response and status updates through its annual workplanning and reporting process. Continued attention to governance transparency, communication, clarity and strategic continuity will be essential to ensure that past recommendations are not only acknowledged but fully embedded into the Program’s future direction.

#	Recommendation
2	Incorporate relevant recommendations from previous reviews into the Performance Management Framework to improve transparency of the Program's response and to streamline reporting processes.

3.1.3 Alignment with FAST

The Response Plan 2023–27 states that, in line with the 2021 Independent Strategic Review recommendation, FAST was established as a separate but complementary Queensland Government-funded initiative to increase suppression activities in SEQ's urban areas. In summary, FAST aims to reduce densities of RIFA by the mobilisation of partners and the community where the current approach of responding to public reports is not providing sufficient suppression.

While technically a distinct initiative overseen by different governance structures, key NFAEP documentation, including the Response Plan, SoP and annual workplans do reference FAST in recognition that collaboration between the two is crucial to achieving eradication.

That being said, the artificial separation between NFAEP and FAST, driven in a large part by its funding arrangements, was found to have further complicated the Program's strategic narrative. This division appears to have weakened strategic coherence and created uncertainty around roles and responsibilities. Throughout consultation, stakeholders, particularly those external to the Program, called for clearer communication of governance, strategy and scientific functions of the two programs to improve awareness and engagement, and ultimately achievement of joint outcomes. For example, it was commonly expressed that "both are working towards the same goal, but the terminology of suppression versus eradication is poorly understood and can cause confusion".

Improved integration between FAST and NFAEP, and between operational reporting and the Response Plan, may be needed to reinforce alignment and ensure that strategic objectives are consistently reflected in implementation. In support of achieving this, consultation revealed the need for clearer metrics, such as treatment coverage, surveillance intensity, clearance rates and net change in infested area, ideally supported by visual tools to enhance transparency and decision-making.

#	Recommendation
3	Integrate FAST into the Performance Management Framework by clearly communicating the scope of FAST and the scope of the NFAEP, highlighting areas of overlap, distinctions and complementarities. This should be supported by communications materials to aid public messaging.

3.2 Business case and stakeholders

Summary of findings

Overall, stakeholders continue to support the Program. While governance forums are robust, more efforts need to be made around clarifying their accountabilities, touchpoints and level of wider stakeholder participation. This reinforces the need for clear, consistent and proactive messaging that is easily understood by all stakeholders.

3.2.1 Governance arrangements

The NFAEP operates under a National Environmental Biosecurity Response Agreement (NEBRA)-like arrangement. Between February and May 2024, restructuring of a new governance model for the NFAEP commenced, establishing a refreshed structure for implementing the Response Plan 2023-27 (Table 4). These changes established a National Management Group (NFAEP NMG) as the peak governance and decision-making forum through which RIFA-related decisions were to be made.

Prior to the governance changes in early 2024, governance was comprised of a Steering Committee (SC), a Senior Leadership Board (SLB), a Risk Management Sub-Committee (RMSC) and a Scientific Advisory group (SAG). These forums were replaced by the NMG, a Consultative Committee (NFAEP CC), a Risk Management and Assurance Committee (NFAEP RMAC), and a Program Board.

The following table outlines the roles and associated assurance responsibilities.

Table 3 NFAEP governance roles and responsibilities, as determined by each forum's Terms of Reference (ToR)

Governance Body	Roles and Responsibilities as per ToR
National Management Group (NFAEP NMG)	Peak decision-making and governance group in relation to RIFA and the Response Plan 2023-27, accountable to the AGSOC and the AMM. The NMG oversees all areas of the NFAEP, including policy and resource commitments, program performance monitoring, and determining eradication status based on advice from supporting governance bodies.
Consultative Committee (NFAEP CC)	Responsible for advising the NFAEP NMG on the scientific direction, technical feasibility, and management of the response, including surveillance, treatment, and eradication strategies. It is expected to provide expert recommendations, oversees resource commitments, monitor program performance, and ensure decisions align with the Response Plan 2023–27.
Program Board	Drives delivery of the Response Plan 2023–27 by ensuring eradication feasibility, managing scope, risk, and budget, and maintaining financial integrity. It resolves strategic issues across projects, provides guidance on major business implications, and reports progress to NFAEP NMG, NFAEP CC, and RMAC.
Risk Management and Assurance Committee (NFAEP RMAC)	Provides independent assurance and risk governance for the Program by approving the risk appetite statement and thresholds, advising on risk management when risks exceed operating limits, and ensuring the risk trigger framework is fit for purpose. It reviews and endorses audit and assurance deliverables, tranche reviews, and key risk reports, and provides annual and quarterly assurance and risk plans to the NFAEP NMG.
Contingency Options Planning Group (COPG)	Develops contingency plans for transitioning the Program from eradication to either management or containment, ensuring alignment with existing governance, cost-sharing, and funding arrangements. Members provide jurisdictional-specific input, templates, lessons learned, and advice on timelines, funding models, governance structures, and public messaging.

Oversight of the implementation of the Program’s Response Plan 2023-2027 therefore rests with the NFAEP NMG, comprised of members of the National Biosecurity Committee (NBC) with appropriate delegations. The NFAEP NMG is also responsible for ensuring the national RIFA response is accountable to the Agriculture Senior Officers Committee (AGSOC) and the AMM.

The Senior Responsible Officer (SRO) provides a single accountability to the NMG and NFAEP CC and the Program Board. This role also sponsors the FAST operating within QDPI. Consistent with NEBRA-like principles, the role sits with Queensland as the lead (combat) state and is held by the Deputy Director-General and Chief Biosecurity Officer. The SRO has overall and ongoing accountability for the successful delivery of the outcomes of the program.

An NFAEP Consultative Committee (NFAEP CC) is comprised of senior members of the Commonwealth and state and territory government agriculture agencies, and the forum’s composition is intended to be supported by appropriate expertise in response management and technical subject matter knowledge, and to have representatives from industry groups. The NFAEP Consultative Committee (NFAEP CC) incorporates the responsibilities of the former National Exotic Invasive Ant Scientific Advisory Group (SAG). Led by an independent Chair, the role of the NFAEP CC is to provide overall guidance and monitoring of the program, alongside the NFAEP RMAC and Program Board. In addition to NFAEP leadership positions, the Program

Board includes a representative from the FAST and a rotating member from the cost share partners (with the Commonwealth to provide the first-year representative). It is noted that the Commonwealth member has provided the first 2 years of representation.

A Contingency Options Planning Group (COPG) for RIFA has been established to respond if a risk trigger (detailed within the Response Plan 2023-27) is met, deeming eradication of RIFA no longer technically feasible. The COPG is responsible for considering options to transition to management or containment if required. It is expected that the governance committee could then make an informed decision with all possible options considered.

This governance model, including the establishment of a NFAEP NMG, is designed with the intention of ensuring that the governance recommendations from the 2021 Strategic Review are being achieved.

An NFAEP RMAC was also established in April 2024, replacing (through membership extension) the former RMSC. The former RMSC scope was increased to include oversight of a new Assurance Plan and associated activities to ensure appropriate quality measures are in place.

The Program uses the technical expertise of the NFAEP RMAC and an NFAEP CC to test Program progress, including technical feasibility of eradication and provide expert guidance on managing risks and issues that can impact Program progress.

Document review and stakeholder consultation indicated that the Consultative Committee was not fully effectively able to fulfill its role in providing scientific and technical advice. While there were some calls for the re-establishment of the SAG, and even a dedicated CRC on Red Imported Fire Ant Research, most stakeholders were of the view that the Consultative Committee was the most appropriate vehicle for scientific and technical input.

#	Recommendation
4	Continue to strengthen the Consultative Committee's technical advisory role, as outlined in its TOR, including through the use of expert panels to enhance technical and scientific guidance for the Program.

An Assurance Strategy and Plan was endorsed by the NFAEP NMG in July 2024. This Plan outlines how assurance activities under the Program will focus on the highest-risk areas to give the NMG confidence that the Program is achieving its objectives. The assurance model aims to provide an independent assessment of the whether the Program is on track, applying relevant procedures, and managing projects and activities effectively to produce the intended outcomes. The plan is required to be reviewed annually and was due for review in March 2025. The Assurance Plan is also intended to be complemented by an Assurance Review Action Plan (otherwise referred to as an Assurance recommendation tracker), which would function to track how and if recommendations have been addressed. The NFAEP RMAC is the responsible party for the Assurance Plan and it appears its implementation has been hindered. Further exploration of this point is in Section 3.4.1.

On paper, the Program's governance framework appears comprehensive, with defined roles, responsibilities, and escalation mechanisms through the NFAEP NMG, supported by a documented RACI (Responsible, Accountable, Consulted, and Informed) model aimed at providing accountability and transparency. However, the effectiveness of these arrangements depends on how well they are operationalised in practice, and the evidence for this review suggests gaps between design and implementation.

Further, the SoP introduced three frameworks through which the Program was intended to be managed by: MSP, ADKAR, and a to-be-developed-in-flight Target Operating Model (TOM). The MSP framework was adopted to function as the key delivery framework. Its implementation was to be supported by ADKAR. All of this was intended to be underpinned by the TOM. There is little piecing together as to why these models and frameworks were chosen, and how they were to be applied in practice, which has resulted in fragmented and minimal attempts to genuinely incorporate these structures into the Program's governance and management.

The SoP presents the TOM as offering the ability to provide: *"a shared and transparent representation of how the NFAEP functions, including what capabilities it holds [and how these] will be deployed to achieve its purpose; and when and where these capabilities will be applied in the context of the process, people, technology, and information."*

In practice, the adoption of MSP, ADKAR and the proposed movement toward a TOM has been poorly integrated. Attempts to implement them have been minimal and largely theoretical, with little evidence of genuine application in practice. This has led to confusion across the Program, compounded by insufficient resourcing for change management and succession planning. Of the three frameworks, a target operating

model is the most advisable given it gives a concrete and definable structure about how the NFAEP could operate in practical terms from a people and processes perspective, as opposed to MSP and ADKAR.

In summary, while the governance model is comprehensive, its complexity, which layers multiple frameworks (MSP, ADKAR, TOM) on top of a suite of committees and boards (NFAEP NMG, CC, RMAC, Program Board), has created difficult to navigate bureaucratic barriers. Furthermore, governance forums only occasionally have visibility of each other's activities, leading to a silo-effect between them. This largely stems from how information is translated up to the strategic level for executive decision making from on-the-ground operational teams and, likewise, how sometimes broad strategic objectives are translated into complex operational actions. This has sometimes led to confusion around roles, escalation pathways, and decision-making authority (or indeed what decision is being sought).

The disconnect between design and execution can sometimes limit agility and responsiveness, and concerns expressed that the RMAC may function "for tick-boxing purposes" rather than as an enabler (explored further in Section 3.4.1). Clarifying governance structures, such as responsibilities, escalation pathways, change control, and risk management, would cut through this complexity, improve coordination across forums, and enable streamlined, accountable, and adaptive decision-making that supports effective and informed Program delivery. This includes representing committees that may not be on existing governance diagrams, but nonetheless still have a role in approving program activities (i.e. QLD Governments *Government Advertising and Communication Committee* for external communications). There is also a need to update the governance structure to reflect recent changes to the composition of the Program Board, including reference to its supporting program delivery committees.

#	Recommendation
5	Clarify the governance structures that support the recent operational re-alignment including key responsibilities and accountabilities, escalation pathways, change control and risk management, to facilitate improved responsiveness in Program delivery and more agile decision-making.

3.2.2 Linkages and collaboration with other government programs

The Program engages a broad network of government stakeholders, including all Australian jurisdictions and cost-share partners. While there are opportunities to strengthen collaboration with other government programs and initiatives, the review team considers that the priority should first be improving the effectiveness of existing linkages, to then allow for leverage points and synergies to emerge as a result and as intended. Current arrangements, such as the make-up of governing bodies like the NFAEP NMG and NFAEP CC, provide mechanisms to identify dependencies and overlaps and enable cross-jurisdictional coordination when required. These structures also offer opportunities to share lessons and leverage expertise across jurisdictions. The primary remaining challenge is that, while mechanisms exist, the on-ground reality does not appear aligned to the intention. This has already been discussed in Section 3.2.1.

That said, some examples are highlighted here where linkages could be improved. For example, the Department of Climate Change, Energy, the Environment and Water's *Introduced insects and other invertebrates in Australia* webpage lacks an explicit mention of fire ants, referring users of the website on to tramp ants, a term to refer to RIFA that is not used by the NFAEP. This lack of consistent messaging represents a missed opportunity to reinforce national messaging and elevate eradication as a shared priority. Without explicit visibility, public awareness risks being undermined and cross-jurisdictional coordination is weakened. There may also be the potential to better showcase the Program through the National Biosecurity Strategy (NBS), notably through including it in the NBS next action plan to further emphasise its Australia-wide significance.

Inconsistent movement controls and compliance enforcement across jurisdictions were also identified by stakeholders as weaknesses, contributing to inconsistent messaging about the Program's urgency. Local councils expressed willingness to support delivery but reported feeling under-engaged, with calls for clearer timelines, stronger messaging on treatment rationale, and targeted efforts to counter misinformation.

Stakeholders raised the possibility of embedding Program officers within local organisations to reinforce policy credibility and improve coordination. This included allowing more flexibility and recognising existing community efforts to combat fire ants as complementary to NFAEP ones. There was support expressed for leveraging

lessons from other biosecurity programs, such as bird and swine flu, which could be supported through improved technical advice from existing governance bodies, such as the NFAEP CC or the NFAEP RMAC.

There also appears to be ongoing confusion around the operational separation and alignment between NFAEP and FAST by nearly all stakeholder groups. Discussion in relation to this issue has been kept to Section 3.1.3.

Although there is room for improvement, it is the view of the review team that greater value would be achieved by focusing on clarifying governance and information management structures, which would naturally lead to improved collaboration and linkage with other government programs.

3.2.3 Stakeholder support for the Program

Stakeholder consultation via workshops demonstrated that the Program is generally supported. That is, the majority of stakeholders consulted throughout this review expressed positive sentiment when considering the Program as a whole. As previously stated, consultation occurred across 4 stakeholder workshops, specifically: Government (35 people), Industry (20 people), Community (18 people), and Research and Innovation (3 people) groups.

Attendance to consultation workshops was voluntary and attendance numbers and the diversity of voices represented in some workshops was low. This suggests a need for the Program to encourage greater and stronger involvement of key stakeholders from the community, as well as from the industry, research and innovation sectors. These voices similarly appear to have been variably included in the Program's governance and decision-making processes on an as needs basis. The Program recognises that strengthening engagement and partnerships is critical. This Program views this to be important as it transitions to self-treatment models and as it increasingly relies on local government and community participation. However, current engagement mechanisms are limited and there is no structured pathway for capturing, documenting, and responding to external stakeholder input, which risks inconsistency and missed opportunities to build trust and collaboration amongst the wider community.

Industry and research stakeholders also expressed interest in contributing more actively to Program design and innovation but noted the absence of a formal forum to facilitate this. While the NFAEP CC ToR requires that it engage with industry and other stakeholders, there is not a dedicated platform for transparent dialogue or collaborative problem-solving.

There may be a benefit in establishing a National Stakeholder Reference Group comprising representatives from industry, community, and the research and innovation sectors. This group could help the Program to address the gaps described above, giving stakeholders an established forum to be involved in the Program. Care would be needed to ensure that group make-up be balanced with diverse voices and representation across the various sectors. Such a forum would complement the NFAEP CC's role by creating a structured mechanism for two-way communication between the Program and the communities in which it impacts, improving transparency, and enabling practical input into Program priorities and implementation. It would also help align messaging, strengthen partnerships, and promote collaboration across sectors, which are critical for sustaining community confidence and trust and achieving long-term eradication goals.

#	Recommendation
6	Consider establishing a National Stakeholder Reference Group made up of key representatives from across industry, community and the research and innovation sector as a forum to improve transparency, strengthen engagement and promote collaboration.

Negative sentiment about the Program's communications emerged as a significant problem across all stakeholder groups, with widespread concern about public mistrust, misinformation, and fragmented messaging. Two issues stand out: the Program's lack of ability to counter misinformation and the internal processes that constrain timely communication.

Negative media coverage and misinformation around chemical use, biodiversity impacts, aerial treatments, and broader scientific rationale and community safety continue to shape negative public sentiment and perception. The Program's cautious approach to messaging has limited its ability to respond quickly and proactively,

leaving space for emotionally driven opposition and anti-government narratives. Community trust is being eroded by unclear messaging, limited visibility of success stories and fatigue. Stakeholders called for stronger public education, greater use of technology to demonstrate surveillance efforts, and the showcasing of achievements to rebuild confidence. Despite covering approximately 800,000 hectares in the past two years, these successes are not being communicated effectively, and the lack of accessible data has allowed misinformation to persist.

Internal approval processes for campaign materials and messaging are slow and restrictive, preventing timely engagement. Staff on the ground often lack the tools and authority to respond to community concerns or explain Program decisions, creating gaps in engagement and trust. While communication skills within the Program are strong, they are not consistently reaching frontline teams. This disconnect between governance and operations is contributing to fragmentation and reduced cohesion. Stakeholders also noted declining engagement and inconsistent messaging across federal, state, and local levels, further undermining confidence. These issues point to a need for a streamlined, expedited approval framework for external communications.

#	Recommendation
7	Develop an expedited approval framework for releasing and publishing Program communications to external stakeholders. This framework should be streamlined to support the Program team and allow for effective Program autonomy.

3.3 Management and delivery of outcomes

Summary of findings

Measurability of the Program has improved, however there are still improvements that could be made to further streamline the ease, speed and transparency of reporting. Progress shows an upwards trend in surveillance and compliance, but treatment against targets is lagging.

3.3.1 Performance monitoring and reporting

As outlined in Section 3.2.1, the Program’s approach to planning, performance measurement and monitoring, and reporting has evolved over time. Under the SoP, annual workplans are developed to align priority actions for the year with the Program’s strategic objectives. Activities are also broken down by stream. Quarterly reporting is provided against the annual workplan, which then forms the basis of the Program’s annual report.

The review found that despite this change being initiated within the contents of the SoP, the approach to performance monitoring and reporting remains underdeveloped in several key areas. As previously discussed, there are ongoing concerns around the clarity and coherence of objectives and the ability to track progress against them. In particular, reporting continues to be heavily activity-based, with limited use of clear metrics or outcomes-focused communication. While KPIs have been defined, they are seen as overly broad and not sufficiently linked to operational decision-making. This has slowed responsiveness and created uncertainty in tracking progress.

Key Program stakeholders also expressed concern about the lack of outcomes-based reporting and limited transparency of progress. While monthly updates on treatment locations are provided, there is insufficient information on treatment efficacy, baiting rates and trend data. This limits the community’s ability to assess whether the Program is achieving true eradication or simply temporary clearance.

Requests for meaningful metrics and clearer reporting frameworks were consistent across stakeholder groups. The absence of accessible data and consistent performance indicators has contributed to public scepticism and reduced confidence in the Program’s delivery.

#	Recommendation
8	Ensure progress is reported against outcomes not just activities/outputs with appropriately agreed KPIs.

Ongoing changes in how Program progress is reported, along with data and system inefficiencies, including clunky approval processes, has also hampered the timeliness and transparency of Program reporting. The review found that while strengthened governance structures, including a more effective NFAEP NMG and Consultative Committee, have supported coordination, delivery and reporting remain uneven.

For example, approval of the 2023-24 Annual Report was provided more than 12 months after the end of the financial year. This evidences the Program making efforts to ensure transparency by publishing annual workplans and reports, however, significant delays like this need to be avoided in the future. Delays have also occurred for the submission of national milestone reports, which has implications for the timing and release of Program funding.

Improved transparency through regular reporting on KPIs and implementation plans is needed to ensure the Program remains on track. Improved timeliness and consistency of reporting against defined outcomes is required not only to improve the integration of performance data into planning and decision-making processes, but to increase transparency and accountability of the Program's progress.

#	Recommendation
9	Prioritise system and process improvements to ensure the timeliness, efficiency and transparency of Program planning, monitoring and reporting.

More consistent and timely development of the Program's performance could also be used to assist proactive and targeted public communications and engagement efforts. During consultation, external stakeholders highlighted several NFAEP success stories that they believe could be shared more effectively to build community confidence and trust. They commented that they usually heard about these successes informally or through existing Program forums, but felt there were opportunities to share achievements more widely.

#	Recommendation
10	Use insights from the Program reporting to inform and guide how the communication and engagement strategy is delivered, e.g., highlighting success stories and positive community interactions.

3.3.2 Progress toward outcomes

The review found that the NFAEP has made progress in formalising its planning approach. However, there are several structural and operational challenges that have affected its ability to consistently deliver against Program outcomes. Planning efforts have evolved and are underpinned by the aim to eradicate RIFA by 2032, but the translation of this on the ground has been challenged by funding delays, adverse weather conditions, workforce limitations and logistical disruptions in the first two years of the Response Plan 2023-27.

The development of the SoP itself was in response to delays that occurred in the first year of the Response Plan 2023-27. In addition to clarifying the Program's strategic objectives and outcomes, as discussed elsewhere in this report, agreement of the SoP by the NFAEP NMG is evidence of the Program's ability to adapt and take corrective action where progress has lagged, and when and if achievement of outcomes is at risk.

Key features of the SoP change request included the Program recalibrating its treatment protocols, introducing risk-based planning methods and proposing reinvestment of unspent funds into priority areas. In particular, the SoP outlined a change request to reduce treatment rounds from six to four, supported by efficacy modelling, and to establish an Eradication Treatment Protection Zone to mitigate reinfestation risks.

Subsequent progress in the 2024-25 is outlined in NFAEP reporting for July – June 2024-25 sighted by the review team. Reporting against strategic objectives and outcomes for 2024-25 indicates that the Program has made good progress in compliance, surveillance and engagement, positioning it well for its eradication goals. However, the report highlights ongoing challenges with meeting treatment targets, including both treatment area and gap targets, as well as responding to outlier detections. These challenges are further evidenced in program risk reporting sighted by the review team.

In light of this, the review team supports urgent prioritisation of actions identified by the Program to mitigate these risks such that the Program’s strategic objectives and outcomes are not further compromised.

In addition, the review team reiterates the role that science and innovation have already played and must continue to play to provide effective and efficient solutions to achieving strategic outcomes within the Program’s existing budget.

#	Recommendation
11	Finalise the detection response framework to enhance the Program’s ability to respond effectively to detections and operational challenges.
12	Continue to develop the Program’s innovation framework and capability which will be necessary to identify ongoing solutions for more efficient and effective treatment and surveillance.

3.4 Risk management

Summary of findings

Risk management is somewhat static and lacks a continuous process throughout the various governance bodies. There is a need to continue to build risk literacy, including around the risk triggers and what constitutes effective risk management.

3.4.1 Identification and management of Program risks

Risk management is embedded into the Program’s governance and planning structures, with all decisions intended to occur within a framework that considers risks, threats, and uncertainty. The NFAEP NMG holds ultimate accountability for risk management, supported by the RMAC for assurance that strategic risks are effectively managed. The NMG approves the risk management planning process and monitors identified risks to ensure mitigation remains within the Program’s risk appetite. While this governance model reflects sound principles, its implementation has not fully achieved the intended level of proactive oversight.

The RMAC, established in early 2024 to replace the former Risk Management Sub-Committee, was designed to provide independent advice on risks to achieving the Program vision and to offer assurance to the NFAEP NMG, Consultative Committee and Program Board. While the governance model and first-line defence controls introduced through the Assurance Plan represent robust risk management thinking, RMAC’s role does not appear fully realised. Consultation with RMAC members revealed the committee often functions as a formality rather than an active governance body, with limited engagement and short turnaround times constraining its ability to provide strategic guidance. It was expressed in consultation that the committee was seen to be “for tick-boxing purposes” by the broader Program. Members expressed a need for earlier visibility of issues, and external stakeholders indicated they would welcome greater engagement with RMAC.

Under the Risk Review Schedule, RMAC is expected to meet quarterly or as required when tolerance limits are exceeded or risk triggers occur. These meetings are intended to guide risk prevention, mitigation strategies, and review aggregated impacts. However, only two formal meetings have been held since its establishment, suggesting RMAC is operating reactively rather than proactively. While risk is discussed at NMG and NFAEP CC meetings, this should not substitute for RMAC’s dedicated technical and assurance function.

#	Recommendation
13	Further empower the RMAC in its role in the Program's governance structure to ensure proactive rather than reactive risk management.

Risks are managed through a suite of internally maintained risk management and reporting documents. All risks are recorded and reviewed monthly, with high or extreme risks reported to the Program Board, RMAC, and the NFAEP NMG. A trigger under the Response Plan occurs when a risk is no longer adequately mitigated or an immediate risk emerges, prompting formal escalation.

Following an October 2024 change, quarterly reports now focus on risk triggers only, with operational risks managed continuously in registers. Risk trigger thresholds have been developed to support consistent assessment; however, uncertainty remains about whether risks outside tolerance are consistently escalated or reported to RMAC. This inconsistency suggests exception reporting processes are not fully embedded, resulting in siloed and reactive responses rather than coordinated, forward-looking planning.

States and Territories expressed concern about inconsistent risk views across the Program, which could complicate responses if RIFA spreads to other jurisdictions. Perceptions of unclear information flows between governance committees, as well as uncertainty about decision-making responsibilities, are impeding governance effectiveness. Stakeholders also highlighted the need for flexibility to accommodate emerging threats and scenarios, and further evidence gathered during a review of program documentation indicated that there is uncertainty about how future risks are fully contemplated.

Challenges remain in reconciling Queensland's standard risk management approach with NEBRA-like arrangements and the need to report on risk triggers. Building shared risk literacy and ensuring that risk trigger reporting is dynamic and not static is essential. Risk management should evolve into a continuous, adaptive process across governance bodies, supported by improved understanding of risk triggers and what constitutes effective risk oversight.

#	Recommendation
14	Improve the clarify of risk triggers by better articulating thresholds for action, tolerances and adaptability mechanisms beyond the immediate response plan and current threat profile.

3.5 Readiness for next phase

Summary of findings

The Program continues to build momentum but funding uncertainty beyond 2027, coupled with a lack of a business case and a tailored Target Operating Model to support it in the long term, is jeopardising key Program areas like resourcing and procurement. While it appears there is an underspend, there is a need to further address progress in treatment targets.

3.5.1 Program budget and financial management

The Response Plan 2023-27 and associated Federal Funding Agreement formalises the commitment of a total of \$592.846 million from Federal, State and Territory governments to the NFAEP's eradication efforts over the life of the Plan. This investment is complemented by further investment into FAST by the Queensland Government.

Table 5 below provides a summary of the budget outcomes for the first two years of the Response Plan 2023-27. In both years, annual workplan budgets were revised in response to changing program circumstances. In 2023-24, revisions reflected expected delays in funding and the significant expansion of the Program, resulting in lower expenditure than initially forecast. In 2024-25, the SoP set out a revised budget for the year.

Table 4 Budget Outcomes 2023-24 and 2024-25

	Indicative Budget*	Recast Budget**	Actual***
2023-24	\$133.1 million	\$84.3 million	\$88.4 million
2024-25	\$143.0 million	\$175.2 million	\$139.1 million

* As per the Response Plan 2023-27, ** As per the 2023-24 Workplan and 2024-25 Workplan, *** As per Annual and Quarterly Reports

Given the ability to carry forward funding from Program underspends, and the commitments made from all funding partners, it can be concluded that sufficient funding is available to meet planned expenditure for the remainder of the Response Plan 2023-27. As per the SoP, indicative budget projections for the next two financial years are:

- **\$164.7 million** in 2025-26
- **\$174.5 million** in 2026-27.

However, despite overall project expenditure remaining within the budget envelope, there is a risk that the objectives and outcomes of the Program may still not be realised by the end of 2026-27. In particular, there is a need to closely monitor underpinning efficiency assumptions to ensure that on-ground targets for treatment, surveillance and compliance can be met. The Response Plan 2023-27 identified assumptions underpinning necessary opportunity savings, which are yet to be realised, including:

- Fast-tracked procurement processes
- Achievement of economies of scale
- Contract durations that enable regular market testing
- Diversification of treatment product options
- Reduction in foot treatment through the use of drones
- Use of remote surveillance systems (RSS) and artificial intelligence.

The importance of the role that science and innovation will continue to play to provide effective and efficient solutions to achieving strategic outcomes within the Program's existing budget was highlighted in Section 3.3.2. As were challenges around meeting treatment targets and managing the response to outlier detections. Key assumptions for treatment targets include average treatment cost per hectare, and the treatment method. That is, ratio of aerial to field activity, which is a key driver of the average treatment cost per hectare.

Stakeholder consultation highlighted the need for increased visibility around treatment cost assumptions, given that the overall target is lagging. Similarly, the cost implications of responding to outlier detections need to be better accounted for, given that these have been higher than initially anticipated.

While progress reporting for July-June, 2024-25 shows that the ratio of air:ground treatment is approaching the intended benchmark, a breakdown of budget to actual expenditure for the year suggests that treatment costs were on or close to budget (\$89.7 million actual expenditure compared to \$89.3 million budget) however total year to date treatment was only 71% of the target area (i.e. 577,289 ha compared to a target of 816,283 ha), suggesting there is further work to be done in reducing average treatment costs.

In addition to the need to ensure that on-ground targets can be achieved, the review has also highlighted gaps in the Program's enabling services. These are likely to require increased resourcing, including:

- IT systems and data infrastructure (e.g. platforms for tracking infestations, treatment schedules and costs)
- Procurement and logistics (e.g. timely access to equipment, vehicles, chemicals, depot facilities)
- Human resources and workforce support (e.g. onboarding, training, contract management)
- Communications and public engagement (e.g. media campaigns, stakeholder updates, community education)
- Governance and decision-making support (e.g. secretariat functions, coordination between jurisdictions).

Patterns of Program underspend, and how they are currently reported, suggest that more robust budget tracking and forecasting approaches may be required. While adequate funding is currently available to the Program, the critical caveat to this finding is that, for the available funding to achieve the objectives set out in

the SoP, there is a fundamental need for a more targeted, agile and strategic approach to financial management that ensures the remaining funds are effectively spent in the final two years.

#	Recommendation
15	Strengthen financial reporting to include budget reforecasting capability to give assurance that future Program activities remain within the overall budget envelope and that key underlying assumptions (e.g. treatment cost per ha) still hold.

3.5.2 Mobilising the Program’s resources

Despite the NFAEP having now been in operation for over 20 years, the unprecedented level of funding provided for the implementation of the Response Plan 2023-27 has provided important lessons in mobilising resources and building capability to meet the expanded Program’s needs.

The development of the SoP referenced the adoption of the MSP framework and intent to formalise the Program’s TOM, however, the TOM has not yet been developed. The design and delivery of the TOM was intended to occur “in-flight” as part of the scaled-up Response Plan 2023-27, but its absence leaves a gap in strategic clarity. A TOM would create a shared understanding of how the Program functions, including what capabilities it holds, how these capabilities are used in practice, and when and where they are applied across process, people, technology and information domains. Without these components, stakeholders lack a reference point for understanding how the Program will scale, adapt and transition over time, particularly in response to changing risk profiles and operational demands.

While there is evidence to suggest that the Program has made steady progress in expanding its workforce and implementing training and professional development programs, the development of a strategic workforce plan to identify and respond to workforce trends and skills gaps has lagged. It is understood that the Program has recently engaged an external provider to progress this work as a priority for delivery in 2025-26. Similarly, the Program has recognised the need to further progress recommendations from an earlier systems review in the 2025-26 annual workplan.

#	Recommendation
16	Prioritise finalising and implementing the Program’s strategic workforce plan to ensure that the Program has the skills, capacity and strategies in place to address gaps and meet long-term objectives.
17	Continue with the planned establishment of a dedicated strategic systems team in 2025-26 to refocus resources on the Program’s IT strategy to address long-term technology needs and enhance system capabilities.

The Program operates within a diverse and evolving market landscape, engaging with a range of actors whose roles are central to delivery feasibility. These include contracted treatment providers, logistics and supply partners, research institutions, local councils, high-risk industries and community stakeholders. Each brings distinct capabilities, from operational delivery and innovation to local coordination and risk management. Engagement with these actors seems to have occurred to varying degrees, with strong collaboration evident in research and innovation, and growing recognition of the need for earlier, more structured involvement of councils and industry.

While there is evidence of constructive collaboration with research and innovation stakeholders, it is important to note that consultation with this group was limited in the review. The small number of participants suggests that broader engagement across the research and innovation sector may not have been fully realised, potentially excluding the voices of those that may not share the positive views of those who participated in the review. Research and innovation stakeholders participating in the review, however, described the Program as committed, open to new technologies, and willing to explore tailored solutions, indicating a strong orientation toward innovation and adaptive delivery. These insights are encouraging, but they are caveated by the narrow scope of consultation.

The Program has engaged with delivery chain actors, though this has not always happened at optimal stages. Stakeholders in high-risk industries noted a shift from early-stage support and guidance toward a more compliance-driven approach in more recent times. This transition has created a need for clearer interpretive assistance and dedicated forums to support shared understanding and practical implementation. These insights suggest that while supplier capability may have been considered at a point in time, the mechanisms for ongoing market input and responsiveness could be strengthened.

Similarly, local councils have expressed a need for earlier and more structured engagement to support preparedness and resourcing, highlighting a missed opportunity to tap into local delivery capacity more effectively.

Stakeholders indicated that the Program is increasingly aware of supply-side capability and capacity. However, limited visibility of the Program's current status among some market participants suggests that communication and transparency remain areas for improvement.

Overall, market input has influenced aspects of Program delivery, particularly in research partnerships and technology adoption. There is, however, a need to more systematically integrate market feedback into Program design and strategic planning across the next two years.

The Program could establish structured engagement cycles at pre-defined stages of planning and implementation with key market actors, such as delivery partners, councils, industry representatives, and research institutions (refer to recommendation 6). Early engagement with delivery partners (i.e., prior to finalising operational plans) would allow for co-design of treatment schedules, risk mitigation strategies and innovation pilots, which would ultimately build trust and buy-in as well. Procurement and partnership strategies could be refined to reflect current market capacity and constraints, ensuring that delivery expectations are realistic and aligned with supplier capabilities.

As described throughout, improved reporting systems and transparent communication channels would also help to close these feedback loops, enabling the Program to remain responsive to emerging needs and maintain strategic alignment across its delivery ecosystem.

3.5.3 Ongoing need for the Program

Review findings indicate that support for the Program's eradication objective remains strong across stakeholder groups, with a clear preference for full eradication over a shift to long-term management. This was consistently expressed in consultations and reflects a shared understanding of the biosecurity risks posed by fire ants.

However, confidence in the Program's long-term viability appears to be challenged by the absence of two critical strategic pieces: a formal business case and a TOM. While the SoP outlines a high-level approach and is backed by national cost-share partners, neither the Response Plan 2023-27, which remains Cabinet-in-Confidence, nor the SoP are underpinned by a full business case. Instead, the Program draws on the 2021 Independent Strategic Review, which may not be an optimal substitute for a comprehensive business case that presents a cost-benefit rationale, delivery feasibility assessment and investment logic. As outlined in Section 3.5.2 above, key elements of a TOM providing a shared understanding of how the Program functions, including what capabilities it holds, how they are used in practice, and when and where they are applied across process, people, technology, and information domains, have also not been finalised.

Consultation also revealed a lack of clear scientific evidence on the environmental and biodiversity impacts of fire ants, which has weakened public perception and stakeholder confidence. While fire ants are recognised as a key threatening species under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), and overseas evidence points to significant ecological disruption, stakeholders noted that locally relevant, peer-reviewed data is limited or not well-communicated. This gap undermines the Program's ability to build a compelling ecological rationale for eradication and risks a decline in informed participation from communities and environmental stakeholders.

In addition, limited transparency around budgeting, treatment rates, and progress against annual targets was consistently raised as a concern. These gaps in reporting and strategic communication make it difficult for stakeholders to assess whether the Program is on track, and whether its resource allocation is proportionate to the scale of the challenge. The absence of a clear evidence base, both ecological and economic, has led some stakeholders to question whether the Program's need and value are being adequately demonstrated.

Taken together, these findings suggest that while there is strong and ongoing support for the Program’s eradication objective, its strategic foundations require strengthening. The absence of a business case, a TOM, and a well-communicated ecological rationale limits the Program’s ability to demonstrate feasibility, value and long-term sustainability. Addressing these gaps will be critical to maintaining stakeholder confidence, securing future investment and ensuring the Program remains strategically aligned and responsive to evolving risks.

In summary, much has been learned during the first two years of the Response Plan 2023–27, with the Program building significant momentum. Progress to date suggests that the shared national vision that *“Australia is free from Red Imported Fire Ants by 2032 to protect our ecosystems, industries, economy and way of life”* remains achievable. The evidence presented throughout this review demonstrates that there is a valuable opportunity to continue delivering against the Program’s strategic objectives and outcomes by commencing early planning and preparedness for the next Response Plan beyond 2027.

#	Recommendation
18	Prioritise work to commence the development of the next Response Plan (beyond 2027) by incorporating specific actions into the Work Plan for 2025-26. This is necessary to ensure early engagement with jurisdictions and the timely identification and delivery of key inputs needed for the development of the supporting business case.
19	Leverage the newly integrated Response Plan (2023-27) and Performance Management Framework (refer Recommendation 1) to inform the development of a business case and target operating model for the next Response Plan (beyond 2027).

4. Conclusion and recommendations

Gateway reviews allow major programs such as the NFAEP to be independently examined at key decision points. They intend to help identify opportunities to improve the delivery of programs to ensure the best possible outcome is achieved.

This report is a snapshot of the NFAEP at the time of the review. It reflects the views of the independent review team based on information provided and evaluated, including Program documents and materials, and input from key stakeholders.

It is important to note that the content of this report will not ensure success, rather the review aims to identify factors that are, or are likely to be, putting the Program's success at risk. The review does not replace the need to conduct ongoing risk identification, analysis, other review, health check or audit activities.

4.1 Delivery confidence assessment rating

The review findings support an overall '**Amber**' rating of delivery confidence by the independent review team.

This rating has been determined based on an in-depth investigation of the materials and is supported by stakeholder consultation and subsequent analysis, with overall findings evidencing that:

- Successful delivery of the NFAEP appears to be still feasible when considering the direction and planned outcomes of the Program
- There is strong support for the Program across key stakeholders
- Sufficient funding is available to meet planned expenditure for the remainder of the Response Plan 2023-27
- The Program is generally progressing towards its vision of eradication.

However, significant issues exist, which require attention to ensure that the Program progresses effectively, better aligns to Program targets and goals, and strengthens community trust. These appear resolvable at this stage and, if addressed promptly, should not impact the realisation of benefits. Ongoing funding continuity is critical to ensuring identified issues can be addressed in a timely way.

4.2 Summary of recommendations

A summary of the review recommendations is provided in Table 6. To assist with priority setting, and as per the Queensland Government's Gateway Review Guidebook¹, each recommendation has been assigned one of the following ratings:

Recommendation Rating	Description
Critical (Do now)	To achieve success, the recommendation should be actioned immediately
Essential (Do by)	The recommendation is important, but not urgent. Take action before further key decisions are taken
Recommended (Good practice)	The Program would benefit from the uptake of this recommendation.

Table 5 Summary of key findings and recommendations

#	Recommendation	Rating
1	Finalise the integration of the State of the Program (SoP) into the Response Plan 2023-2027 supported by the publication of a Performance Management Framework that documents the Program Logic and provide a clear line of sight between Program planning, measuring and monitoring performance, and reporting.	Critical
2	Incorporate relevant recommendations from previous reviews into the Performance Management Framework to improve transparency of the Program's response and to streamline reporting processes.	Essential
3	Integrate the Fire Ant Suppression Taskforce (FAST) into the Performance Management Framework by clearly communicating the scope of FAST and the scope of the NFAEP, highlighting areas of overlap, distinctions and complementarities. This should be supported by communications materials to aid public messaging.	Essential
4	Continue to strengthen the Consultative Committee's technical advisory role, as outlined in its Terms of Reference (ToR), including through the use of expert panels to enhance technical and scientific guidance for the Program.	Essential
5	Clarify the governance structures that support the recent operational re-alignment including key responsibilities and accountabilities, escalation pathways, change control and risk management, to facilitate improved responsiveness in Program delivery and more agile decision-making.	Critical
6	Consider establishing a National Stakeholder Reference Group made up of key representatives from across industry, community and the research and innovation sector as a forum to improve transparency, strengthen engagement and promote collaboration.	Recommended
7	Develop an expedited approval framework for releasing and publishing Program communications to external stakeholders. This framework should be streamlined to support the Program team and allow for effective Program autonomy.	Recommended
8	Ensure progress is reported against outcomes not just activities/outputs with appropriately agreed Key Performance Indicators (KPIs).	Essential
9	Prioritise system and process improvements to ensure the timeliness, efficiency and transparency of Program planning, monitoring and reporting.	Recommended
10	Use insights from Program reporting to inform and guide how the communication and engagement strategy is delivered, e.g., highlighting success stories and positive community interactions.	Recommended
11	Finalise the detection response framework to enhance the Program's ability to respond effectively to detections and operational challenges.	Essential
12	Continue to develop the Program's innovation framework and capability which will be necessary to identify ongoing solutions for more efficient and effective treatment and surveillance.	Essential
13	Further empower the Risk Management and Assurance Committee (RMAC) in its role in the Program's governance structure to ensure proactive rather than reactive risk management.	Essential
14	Improve the clarify of risk triggers by better articulating thresholds for action, tolerances and adaptability mechanisms beyond the immediate response plan and current threat profile.	Critical

#	Recommendation	Rating
15	Strengthen financial reporting to include budget reforecasting capability to give assurance that future Program activities remain within the overall budget envelope and that key underlying assumptions (e.g. treatment cost per ha) still hold.	Critical
16	Prioritise finalising and implementing the Program's strategic workforce plan to ensure that the Program has the skills, capacity and strategies in place to address gaps and meet long-term objectives.	Critical
17	Continue with the planned establishment of a dedicated strategic systems team in 2025-26 to refocus resources on the Program's IT strategy to address long-term technology needs and enhance system capabilities.	Essential
18	Prioritise work to commence the development of the next Response Plan (beyond 2027) by incorporating specific actions into the Work Plan for 2025-26. This is necessary to ensure early engagement with jurisdictions and the timely identification and delivery of key inputs needed for the development of the supporting business case.	Critical
19	Leverage the newly integrated Response Plan (2023-27) and Performance Management Framework (refer Recommendation 1) to inform the development of a business case and target operating model for the next Response Plan (beyond 2027).	Critical