



Council of Australasian Weed Societies (CAWS)

Modernising Australia's approach to established pests and diseases of national significance

National Biosecurity Committee Secretariat

Department of Agriculture

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Dear Sir/Madam

RE: Discussion Paper on Managing Established Pests and Diseases of National Significance

The Council of Australasian Weed Societies (CAWS) recognises that this is an important document for weed management as it provides direction for government action on nationally significant established weeds, such as the 'Weeds of National Significance' (WoNS). CAWS therefore encourages governments to capitalise on all opportunities for collaboration with weed managers to maximise the prospect of successful implementation of the proposed new approach.

CAWS provides the following responses to the questions raised in the discussion paper:

1. Are the proposed Policy Principles appropriate and practical?

Firstly, for clarity of communication of the proposed policy principles, CAWS requests an explanation of a number of terms and references used in the proposed framework. This includes the following:

- onshore management of established pests and diseases focuses on asset-based protection to minimise impacts
 - "Onshore" – what does "onshore" mean?
 - If this is only referring to "mainland" Australia and not "offshore islands", then CAWS suggests that a clarification as to why these areas would be exempt?

- Does this mean all land, including islands above/including the intertidal zone?
 - CAWS suggests that this term be included in the definitions to provide clearer communication, given that is a proposed policy principle, and given that this term could mean many different things to different people.
- to achieve asset-based protection, government gives priority to supporting industry and community leadership and actions
 - “Support” or “providing support” is used in a number of areas of the document, but what does this specifically mean or imply?
 - CAWS suggest that some examples be provided to illustrate what the community and industry can expect.
- governments will work with stakeholders to support innovation for more effective pest and disease management
 - What is viewed as “innovation” in the context of more effective pest and disease management?
 - CAWS suggest that some examples be provided to illustrate to the community of the expectations of what the government views as “innovative” (e.g. does this include ‘research and development’?)

CAWS provides the following comments against specific proposed policy principles:

- governments will work with stakeholders to support innovation for more effective pest and disease management;
- where there is a national interest to intervene, established pests and diseases assessed as being nationally significant will have an associated national management plan or strategy
 - In consideration of the above two principles, CAWS suggests that the Australian Government, in collaboration with State and Territory Governments, should use this opportunity to progress implementation of existing national Threat Abatement Plans (TAPs) and to take action on the federally listed Key Threatening Processes (KTPs) where there are no TAPs, as these are already acknowledged as nationally significant issues.
 - CAWS suggests that public assets, such as biodiversity and ecosystem services, need to be appropriately considered in the context of national significance and national interest tests. Therefore CAWS is of the opinion that methods should be developed to adequately estimate the environmental costs and benefits of established pests, especially with regard to issues such as biodiversity loss and ecosystem services.
 - The premise of prevention and eradication being ‘most cost effective’ is traditionally based on economic/agricultural data and impacts. While assessing return on investment (ROI) for funding weed management in agriculture is vitally important nationally, the current cost-benefit analysis approach does not apply to the equally, or arguably greater, environmental costs and impacts of weeds, as we have no way to quantify these environmental costs and impacts. For example, the current economic approach is focused on agricultural costs, and does not take into account the cost of biodiversity loss. As a consequence, environmentally important pest species will again fail the ‘national significance tests’ because their impacts are not properly quantified. This important point was raised in the Senate Enquiry into Environmental Biosecurity (2015)(as CAWS noted in response). If Australia is to undertake the proposed ‘national significance test’ approach, it will be extremely important to adequately address this gap in suitable economic analysis of

environmental weed impacts, or 'environmental' pests will never receive the attention they deserve.

- We note that the Senate Inquiry into Environmental Biosecurity (2015) recognised the above need with regard to national biosecurity responses as follows:
 - *'Recommendation 4 - The committee recommends the Commonwealth Government work with state and territory governments to develop a nationally consistent methodology for incorporating environmental impacts into cost-benefit analyses under the National Environmental Biosecurity Response Agreement'*
(http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/biosecurity/Report).
- A gap in the policy principles identified by CAWS in this discussion paper is a focus on the process of 'containment'. It would be essential that the term 'containment' reflects the terms use in the scientific literature, and in current weed management practice, and is understood in this policy to be a policy principle for established pests and diseases that have not yet to spread to their fullest extent. This is particularly important for those species in the early stages of invasion and where containment is still feasible. The discussion paper instead appears to assume that the pest or disease is already widespread and focusses primarily on 'asset protection'. Whilst asset protection is a necessary and useful tool, it should not be the only tool or main focus for management of environmental pests.
 - There are many examples where the focus of containment effort has shown that it can prevent the spread of an invasive species in the early stages. In particular, the Western Australian (WA) government has been highly effective at preventing pests and diseases established in other parts of Australia from reaching WA. There are also cases where early detection has enabled fast and efficient eradication of highly invasive weed species, such as Parthenium weed in WA.
 - The WoNS initiative provides excellent examples of the value of national containment for established (widespread) weeds. For example, the halt and reversal of the spread of bitou bush along the eastern coastline: This weed is now contained wholly to NSW and a much-reduced threat to Victoria and Queensland, due to regionally-led national containment initiatives in NSW.

2. Are the proposed Policy Principles sufficient?

CAWS believes that the policy principle could be strengthened by addressing the following points:

- There is little mention of the important role of research in identifying innovation and efficacy in the management of pest species. Whilst under the Government Roles and Responsibilities section, the Discussion Paper does state that the government would continue to: *...support research into improved control or management approaches when a strong public interest exists to do so.*,
 - This reference, and the current lack of funding for weed research from the Commonwealth Government, gives the impression to stakeholders that research is an afterthought or that it is of minor significance in the role of management of pest species.
 - Given the level of importance that research plays in providing knowledge for the management of pest species, it is our strong opinion that the need for research should be raised as an urgent priority.



- In addition, CAWS seeks clarification of what constitutes the following:
 - “Support” in the context of government supporting research? This is of particular interest to CAWS, given the lack of a CRC for Weeds and the reduced funding of relevant areas within the CSIRO over recent years.
 - The term “strong public interest” should be clarified to provide more certainty to stakeholders of what level of action is necessary to improve opportunities for government ‘co-investment’.

Additional comments on the Roles and Responsibilities section include:

- CAWS suggests the inclusion of the term ‘risk creators’ in the definitions section. Whilst it is defined under the roles and responsibilities section (i.e. on page 10 of the document), this definition doesn’t occur in the document until after the term is first introduced in the Government roles and responsibilities section of the document (i.e. on page 8 of the document). This lack of upfront clarity diffuses the readability of the document.
- In addition, we suggest that clarification is required for how government is expected to regulate itself in the context of it being a ‘risk creator’ i.e. “... *but does include importers, land developers, operators of earthmoving equipment, contractors engaging multiple landholdings, linear reserve managers (managing roads and railways) and plant nurseries.*”
- **work with industry, community and/or landholder groups where market failure restricts the effective management of established pests and diseases of national significance**
 - An example of a long-standing situation of market failure is found in the nursery/garden industry, which requires significant improvement in plant labelling standards to raise awareness of potential pest plants. The Nursery & Garden Industry Association (NGIA) has developed voluntary standards that contain some deficiencies, and these standards have experienced minimal up-take by the industry. Nursery plant labelling is an area where CAWS is of the strong opinion that the Commonwealth Government needs to take leadership and negotiate mandatory implementation of nursery plant labelling standards. The need for plant labelling reflecting weediness also raises the question as to how minimising regulation is going to change or improve this situation.
 - Another area of market failure is the establishment of pests and diseases via internet seed sales. This was illustrated within the aforementioned Senate Inquiry into Environmental Biosecurity (2015), where two of the recommendations related to improved regulation on the sale of weedy plants, while another related to Internet sales of seeds:
 - *Recommendation 18: The committee recommends that the Commonwealth Government work with state and territory governments, and the horticulture industry, on establishing standardised labelling, weed identification, and sales tracking protocols across the industry.*
 - *Recommendation 15: The committee recommends that the Department of Agriculture undertake enforcement activities against internet retailers and marketplaces that repeatedly breach Australia's plant and seed import requirements and work with these businesses to ensure warnings are displayed when customers attempt to purchase prohibited plants and seeds.*



3. Should listing of established pests and diseases of national significance be for a defined period, or open-ended?

CAWS suggests that, once a pest is defined as an Established Pests and Disease of National Significance (EPaDNS), it should be expected to remain so for an open-ended period as by default it is established and therefore is unlikely to be eradicable. However, while government support is likely necessary in the early stages (where national coordination can assist), it is acknowledged that over time, as national actions are achieved, resourcing responsibility should move to jurisdictional, regional or local land manager level, as appropriate. A system should be developed to address this.

- We suggest that, this process requires a transparent mechanism for categorisation of EPaDNS based on the need for (and benefit of) investment in national coordination. An example of the process of categorisation in a nationally-agreed approach was that utilised by the Australian Weeds Committee, which identified the coordination effort and resources required for implementing the Weeds of National Significance (WoNS) strategy (see www.weeds.org.au/wons for more information).

4. What form of review should be required to maintain the listing of a pest or disease as an established pest or disease of national significance?

In terms of proposed reviews and the proposed Policy Principles, CAWS notes the following:

- **the list of established pests and diseases deemed nationally significant is regularly reviewed against the relevant assessment criteria and principles**
 - In regards to the reference from the above policy principle where it refers to “against the relevant assessment criteria and principles” – will these remain the same as assessment criteria and principles that are currently used e.g. as for WoNS?
 - That is, for weeds, there is already an agreed process for testing national significance (i.e. WoNS). In addition, there are still 12 new WoNs awaiting national coordination. These species were determined as WoNs in 2012 however, as the Australian Government has not provided support for national coordination since 2013/14, implementation of national plans for these new WoNS has not been progressed.
 - We should learn from and utilize the existing WoNS process in the establishment of a national significance process for pests and diseases. CAWS would therefore not support a ‘re-inventing the wheel’ situation, and supports the development of national plans similar to WoNS plans, that can be agreed to and implemented by all stakeholders. This will enhance and support national as well as local outcomes.

5. What is an appropriate time period for such a review?

CAWS suggests that reviews against actions in a strategic plan should occur annually, with a major review of progress against goals at three or five years (species dependent) to determine necessary level of national coordination.

Further, CAWS suggests that it will be imperative that Governments recognise the importance of committing appropriate levels of budgeted funds to undertake this work, and that there is a strong focus on ‘participatory’ engagement (all stakeholders involved from the start in developing and implementing Plans).



6. Are the proposed roles and responsibilities clear, particularly in relation to your role? and

7. Are the proposed roles and responsibilities appropriate and practical?

CAWS is of the opinion that governments should play a leading role in '*the earlier stages of prevention and eradication*', and are also responsible for protection of public assets. CAWS is concerned as to how the risk to public good will be managed. Where the risk is associated with an EPaDNS impacting areas such as public health, biodiversity and the value of public land, there is significant potential that the public good is unlikely to be an incentive for industry and/or community risk management strategies to address these impacts. Across these situations, we strongly suggest that Government needs to provide leadership and be involved to ensure outcomes are delivered.

In relation to the above point, funding for public interest research has been declining over the last decade, while government appears to increasingly invest in research benefiting private interests, providing matching funds when industry invests.

In situations where an EPaDNS affects multiple industries and/or multiple jurisdictions, CAWS sees an opportunity for government to play a key role in coordinating the actions of affected parties. Otherwise it is likely to become more difficult and costly for the private sector to provide effective management.

CAWS also identifies that it will be an essential and fundamental role for government to maintain national infrastructure to support management of EPaDNS. For example, data capture tools such as the Atlas of Living Australia or a similar tools that can be used by stakeholders to share pest surveillance, distribution and management information.

8. What are the issues with establishing and maintaining effective collective action?

The most significant issue with establishing and maintaining collective action is that of continuity of funding and support, to enable stakeholders to effectively plan for, and maintain, critical human and infrastructure capacity for weed management across the country into the long term.

Long-term, stakeholder-inclusive commitment is critical to effectively managing pest species at a landscape level. An effective means of establishing this commitment is through an agreed strategic plan, whose development and implementation is supported by a national coordinator but led by affected stakeholders.

9. How can the coordinated approach be best implemented across the various stakeholder groups?

For many new invasive species it is common to have many unknowns. Where there is uncertainty about risks, and the consequences of failure are high, a significant function of a coordinated approach requires the use of weed control enforcement. Therefore, the level of enforcement and regulation may need to be more active than the 'minimum extent necessary'.

A participatory approach in the development and implementation of EPaDNS plans is critical, as all affected parties must be engaged and their needs and goals considered in order for them to want to be involved in effective, national implementation.



10. How do you see yourself (or your interest/industry/organisation) contributing?

The Council of Australasian Weed Societies (CAWS) is an independent body that can express national and regional views on all issues relating to weeds and their management. The Council is composed of delegates from Australian State Societies (The Weed Society of New South Wales Inc., the Weed Society of Queensland Inc., the Weed Management Society of South Australia, the Weed Society of Victoria Inc., the Weeds Society of Western Australia Inc., and the Tasmanian Weed Society Inc.) and the Plant Protection Society of New Zealand, all of which have weed management as their major focus.

CAWS are therefore in a position to provide representative contributions, such as comments on national weed strategies and action plans, from a national perspective. In addition, CAWS has the advantage of utilising pest management experiences from New Zealand, given CAWS has Australasian rather than just Australian representation.

CAWS can also be an avenue to collect and/or disseminate information to/from the membership base of each weed society, who comprise over 500 members.

11. Other comments

CAWS is expecting the release of the DRAFT Australian Weeds Strategy in the very near future, and will welcome the opportunity to participate in developing and updating this important national document. We suggest that it would be prudent for this Discussion Document and process to constructively inform the expected draft Australian Weeds Strategy.

Yours sincerely

Anna-Marie Penna

President