

Feedback on the National Biosecurity Council's *Modernising Australia's approach to managing established pests and diseases of national significance.*

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The concept of recognizing nationally significant pests and diseases is supported, but it is important that the process of modernising take account of past experiences. If the discussion paper is an indicator, it seems that the experiences of the most obvious Australian precedent in this area, Weeds of National Significance (WoNS), have all but been overlooked. WoNS has run from the late 1990s and continues (though national coordination ended in 2013).

The case study section of this document includes the 'Victorian blackberry taskforce'. A state-based approach is not a modernisation of our approach to managing established pests and diseases of national significance. Whilst the taskforce model is useful to consider, there are many national weed taskforce examples available to consider from the WoNS experience. I suggest that ongoing work on modernising our national approach takes account of how *national* taskforces have operated.

For example, the National Gorse Taskforce ran for ten years and made significant achievements including:

- Providing representation of the interests of relevant states/territories, industry and the Australian Government with relation to gorse
- Production and publication of two editions of a national strategy and two editions of a national best practice management manual
- Coordination of funding for on-ground gorse (*Ulex europaeus*) outlier management projects across five states
- Development and signing of 20 gorse eradication memoranda of understanding across five states, with these being monitored by community/industry and embedded in state policy in some instances
- Development and public provision of national gorse distribution mapping
- Nationally outstanding gorse management achiever awards to five individuals and farm families across four states

Information and approaches taken by the National Gorse Taskforce were adopted in part by gorse public land managers in Oregon, United States of America.

P. 2 The position that 'the management of overabundant wildlife or native species is subject to different policies and programmes, and is outside the scope of this discussion paper' needs clarification or removal. Some of our most serious pest (and perhaps disease?) species are native species. For example, the Queensland fruit fly (*Bactrocera tryoni*). In Tasmania, *Kunzea ericoides* a mainland Australian native plant is an invasive pest. It potentially threatens the Tasmanian Wilderness World Heritage Area. Likewise, some of Western Australia's most serious environmental

weeds are eastern Australian natives. The rainbow lorikeet (*Trichoglossus moluccanus*) native to eastern mainland Australia is an established pest species in Tasmania.

Complete exclusion of wildlife and native species from consideration (if that is what is being suggested) makes little scientific sense. While there is an understandable need to exclude situations such as those where locally native wildlife species are impacting on farm production for instance, the current wording (as quoted above) is so broad brush as to exclude a swathe of relevant 'established pest and disease' situations. The other problem with the current wording is that 'overabundant' means different things to different people, and the use of this word in this context, should be avoided.

p. 3 with regard to the statement in the discussion paper 'for a number of established pests, only a coordinated approach is likely to achieve good results', this has proven to be the experience through WoNS. For example, in the case of gorse, the national taskforce determined that Western Australia's South Coast gorse infestations were among the most strategic gorse management targets in the country. With a national taskforce in place, the culture changes from jurisdictions fighting for resources for their own state or territory, to one where representatives from around the country jointly determine *national priorities*. The National Gorse Taskforce determined that with an appropriately resourced and long term effort, WA's gorse infestations could be eradicated. This inspired both federal and state funding, and a 25 year gorse eradication agreement between the Western Australian Government and the South Coast Region NRM. Though seedbank monitoring must continue for decades to come, aboveground gorse in WA is now eradicated (i.e. no new seed being produced).

Another example came with the national coordination of African boxthorn (*Lycium ferocissimum*). Determination and documentation of best practice management of African boxthorn only came out of national collaboration. Australia and New Zealand are alone in having this species as a serious pest. As a consequence, little literature on the species or its management was available. The species is a weed in a diversity of situations in Australia – offshore islands to semi-arid inland. By collaborating, states were able to share experiences and determine the national success stories. For example, the best practice inland management advice came from NSW and WA. Tasmania, Victoria and South Australia were able to provide the most experience on dealing with coastal infestations.

p. 6 the proposed policy principles are good and cover a broad in scope. However, the principle dealing with 'enforcement intervention' is the business of individual jurisdictions (even though the sentiment expressed here is likely to be agreeable across the board).

p. 7 this section (proposed national significance/national interest test) refers to case studies (section 4). These include the Victorian blackberry taskforce which is an existing state-based initiative. Many national examples are available from over a decade of WoNS.

p. 7 It is unclear on the meaning of the wording 'Australian culture, cultural assets, practice or custom or national image' with regard to pest or disease impacts of national significance. Examples would help.

p. 8 DPIPWE agrees with national interest principles listed. Again, there are many examples from the WoNS experience that could be used to illustrate this.

p. 8 re consultation questions on this page, listing of established pests and diseases should be open-ended with a mechanism for review. Suitable periods for listing species will vary from species to species depending on species biology and what listing seeks to achieve. The type of reviews undertaken during the WoNS national coordination period helped determine achievements that had been made, and what remained to be done. It is suggested that a five or ten-yearly review of pest and disease listings, as established pests and diseases are unlikely to be greatly altered in less time. However, leave an option for the rare situation where immediate review may be required e.g. development and distribution of a magnificent biocontrol that wipes the pest from prominence.

P.9 it is taken for granted that the reader understands the term 'market failure' where it is used here and elsewhere in the document. It is not explained and should be avoided with clear language or defined under 'definitions'.

p. 11 'benefits of a coordinated approach' – many examples from the WoNS experience could be used to illustrate this. Sharing of knowledge to tackle complex issues and reduced duplication of activities for example. With the WoNS gorse project, on tackling management of long term viability of weed seed beds, the answers and actions were determined nationally. Solutions included seed bed destruction research initiated by WA and supported by the other jurisdictions. Also, the national taskforce developed the concept of an agreement (memorandum of understanding) for community, government and industry to manage and monitor for eradication over a 25 year period in strategic locations (outlined above). Prior to WoNS, each state and territory developed and distributed materials on promoting and explaining the management of these weeds. WoNS developed national documents (including best practice management and promotional materials). Some WoNS weed information materials are a single design, but with jurisdiction relevant map and logo inserted for the different states and territories. This represents a more efficient and consistent process, with less duplication of effort.

p. 12 consultation questions 'what are the issues with establishing and maintaining effective collective action?' The success of national coordination in the WoNS model was very reliant on the fact that the states and territories had joint ownership of the model with the Australian Government (it was developed from ground up). Taskforces had state/territory, Australian Government, industry and other community representatives. This was very important. A capacity to take a national perspective and approach, but also see genuine progress achieved on the ground, was important to being effective (i.e. find the nationally strategic locations and provide new tools for making progress against pests and diseases). Perhaps the biggest problem encountered with that model was the (often annual) stop-start nature of funding, and the consequent turnover of coordinators due to contract/job uncertainty.

'How can the coordinated approach be best implemented across the various stakeholder groups?' In WoNS, the secret was to have talented national coordinators operating. These people had the capacity to bring on board a breadth of perspectives and fields of knowledge. For example, experts on biological control, industry (agriculture/forestry), scientific specialists and land managers were frequently consulted on and included in decision making on matters relating to species of national significance.

'How do you see state/territory governments contributing?' During the WoNS national coordination, states and territories contributed staff time for representation on national taskforces. National

coordinators were based in state/territory governments and this often worked well as those people could readily access the many relevant resources available through the agencies they were working for. It is recommend a similar scenario for national coordination of nationally significant pests and diseases.