

Environmental Farmers Network (EFN)

Comment on: 'Modernising Australia's approach to managing established pests and diseases of National significance: Discussion paper'

The EFN:

EFN represents farmers in Southeast Australia interested in sustainable farming in a social, environmental and economic sense. EFN seeks to improve the environmental health of private and public land in farming areas. We represent mostly commercial farmers concerned about the impact of climate change on farms, people and landscapes, loss of farm biodiversity and the loss of farmland and relatively natural areas to urban expansion. Our policies are available at www.environmentalfarmersnetwork.net.au/. In particular, we encourage strong greenhouse gas mitigation and adaptation to climate change. We strongly support State and Federal Governments developing market mechanisms that reward those landholders providing ecosystem services such as retention and protection of biodiversity on farms and carbon sequestration.

Summary:

It is in the national interest as well as that of farmers that pest control is biologically and economically effective, so the EFN is interested in this review of policy. We suggest that market failure is a given where a pest has become of national significance. Consequently we question the underlying assumption that community activism can replace regulation and enforcement, although we agree that community action can be an effective component of an overall strategy. We point out that while community action may be relatively inexpensive for government it can be very costly for active participants.

Consultation questions

1. Are the proposed policy principles appropriate and practical?

No.

The working hypothesis is that volunteer groups of farmers and others will be responsible for most actions required in the conceptual 'asset protection phase' of pest control. The agriculture sector is made up of participants whose individual actions usually have little effect on the whole. In some cases they can increase their effectiveness by acting communally. But farmers do not speak with one voice. The policy fails to take into account the difficulty of mounting effective collective action in this sector. The EFN submits that market failure is a given in the case of many pests of national significance; not just the possibility recognised in the discussion paper.

The proposition that action should be in relation to perceived risk should be more nuanced. As it stands, effective action will be reduced or abandoned when risk drops. This approach could lead to endless cycles of infestation/deinfestation and appears to rule out the ideal, albeit unlikely, situation in which a widespread pest would be driven to extinction.

We suggest that quite a lot could be learned by comparisons with the 'management' of established pests and diseases in the human population, ie epidemiology. The approaches outlined in human pest and disease epidemiology make the ones outlined here seem underdone.

2. Are the proposed policy principles sufficient?

Enforcement is not discussed. It can be argued that the current position with some pests results from an absence of enforcement not an absence of regulation or community action. In some instances the cost of enforcement is borne by local councils who may not see themselves as having had much agency in the setting of regulations.

There is no guidance about triggers for original research. The argument is that in the absence of a practical option, no action is necessary. The EFN submits that this situation should, at least in some situations, trigger research.

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

Listings should be reviewed, but a pest should not be removed simply because it has been on the list for a long time. Pests that remain a problem should remain on the list.

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?

The review should incorporate monitoring and mapping of pest incidence. In some cases this might be achieved by combining remote sensing using geographic information systems (GIS) with ground truthing by community networks.

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

Timing should be pest-specific. Biological lifecycles are one consideration. Another is the time needed for actions to be implemented and effectiveness to be assessed.

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

The main role proposed for farmers appears to be in community groups. It seems that these groups will determine priorities, establish procedures, communicate with members, and rely on social persuasion to achieve compliance for actions that are needed primarily for the public or collective good.

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

Most community groups are not equipped to undertake the tasks envisaged without high quality input from professionals. They do not have access to scientific articles that are peer reviewed because most of these are published in subscription only journals. Individual articles cost ~\$40. About 1 in 10 of the articles so viewed might be useful, indicating a cost of \$400 per effective article.

They may be competent to make careful, objective observations. They will rarely be competent to move these observations from the realms of anecdote to proven at a level that is useful to other groups dealing with similar problems. Work may therefore not have the broad application that it should.

It is not clear how community groups can deal with conflicting interests of their members. It is not unusual for the actions of one to have detrimental external effects on others. Examples include differences between forestry and agriculture, and between 'organic' and conventional farming.

The role of research and extension traditionally carried out by the public service and government funded researchers is still an essential one. That role appears to have been abandoned.

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

In addition to matters mentioned in 6 above, we note that community groups tend to have finite lives, and that within that life they are characterised by bursts of activity and inactivity. Few manage the 'sustained collective action' (p.9) needed.

Other issues are to do with perception of the hazard associated with the pest/disease, the availability of practical control methods, and adequacy of human and financial resources.

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

We agree that information gathering, education (of those representing both public and private good) and consultation are important processes in effective action against pests. We do not agree that collective action is an alternative to 'reliance on regulation'. We see them as complementary. We are aware of successful experiments in citizen science.¹ Models like these may be useful in some types of pest monitoring. We note however that these efforts are usually led by professional scientists and salaried staff. A variation on this theme is the citizen jury, used to draw up a 10 year financial plan for the city of Melbourne.²

Citizen activity needs to be targeted and participants must have good reason for thinking that their reports or views carry weight.

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

The EFN is an active network of farmers interested in the environment. We work for our private good, but also with awareness of the public good. We anticipate continuing to make our voice heard in whatever forums are established.

Concluding comment: the Victorian Blackberry Taskforce

The Blackberry Taskforce is used as an example of what can be achieved through community activism. It also illustrates a number of the points we have made.

This Taskforce depends upon community representatives, supported by salaried professionals both public and private. The effort of community representatives is admirable, but not perpetual. If the group reaches a point at which no community representative is competent or able to take on the role of Chairperson, the group will cease to exist and its achievements will be lost in the following years. This position is more likely where the workload of the Chair is heavy, and/or the Chair is not well supported by other members including government.

The invasive potential of blackberries is still under appreciated by governments. Governments own or manage plantations that are in effect dual cultures of blackberries and pines. The weed control

¹ Eg <http://www.schoolofants.org/> and its Australian offshoot <http://www.schoolofants.org/>; <http://www.schoolofants.org/>, <https://fungimap.org.au/>

² <http://www.theage.com.au/comment/melbourne-peoples-panel-makes-bold-decisions-where-politicians-fear-to-tread-20150401-1mchjp.html>

standards applied to farming appear to have been suspended for both private and public plantations. The seeds produced in these plantations and transferred by animals to surrounding natural forests, are destroying those forests. We suggest that this destruction of natural habitat stems in part from a failure of enforcement and of government as a responsible stakeholder. It is a problem that cannot be rectified by community activism.

Government should carry out its responsibilities as a stakeholder. The Blackberry Taskforce is critical of governments stop and start approach to funding research on biological controls.³

³ <http://www.abc.net.au/news/2015-03-17/blackberry-biocontrol/6324396>