

31 July 2015

National Biosecurity Committee Secretariat
Department of Agriculture
GPO Box 858
Canberra ACT 2601

Established Pests and Diseases Discussion Paper

Introduction:

The Indigenous Land Corporation (ILC) is a corporate Commonwealth entity established in 1995 to assist Indigenous Australians to acquire and manage land to achieve economic, environmental, social and cultural benefits. The ILC prioritises involvement in projects that lead to socio-economic development for Indigenous people, as well as access to and protection of cultural and environmental values.

The ILC is particularly interested in assisting Indigenous people to achieve maximum benefits through ownership and management of land. Much Indigenous-held land is in remote coastal and inland areas and is marginal in terms of productive capacity, but through good management has the potential to provide important ecosystem services, such as preventing the spread of pests and weeds between more productive areas. The ILC seeks appropriate financial incentives for Indigenous landholders to undertake these activities.

Through its subsidiary, National Indigenous Pastoral Enterprises (NIPE), the ILC currently runs 93,000 head of cattle over 2,150,000 hectares of pastoral lands, situated in most Australian states and territories. Through these agribusinesses, the ILC has a direct interest in managing pests and diseases in parallel to its broader role of assisting Indigenous people to achieve benefits through the ownership and management of land.

The ILC welcomes the opportunity to respond to the National Biosecurity Committee's call for public comment on its discussion paper, 'Modernising Australia's approach to managing established pests and diseases of national significance'.

Responses to the consultation questions:

Policy principles

The ILC broadly supports the proposed policy principles. However, the following matters are noted as further considerations that could be incorporated in the policy principles:

- a) Many remote Indigenous landowners have limited resources for self-funded asset protection. In these situations there is an ongoing role for government to support the identification of assets (which may include cultural assets), and to enable those assets to be protected from pests and diseases. Ideally this would occur through collaborative and capacity building approaches.

- b) Pastoral leases are assets owned by State and Territory Governments and many include, or impact on areas of significant ecological assets. Therefore, pest and disease management on leases can be considered a public service. However, few mechanisms are available to reward leaseholder investment in pest control where there is little business benefit, little recognition of weed conditions in property valuations, and insecure tenure. These problems are exacerbated on financially marginal properties. The ILC encourages government to consider mechanisms to address these matters within the context of developing a modern approach.
- c) The ILC encourages the Australian Government to commit to funding research efforts to identify new strategic control opportunities for established pests and diseases, such as biological control agents.

Roles and responsibilities

The ILC broadly supports the notion that the management of pests and diseases should be shared by government and community in proportion to their relative public or private benefit. However, the divide between public and private interest is often unclear. Australia's northern rangelands contain a vast wealth of ecological assets, much of which is seriously threatened by invasive pests. The feral cat and the invasive weed *Mimosa pigra* are two examples. Most leaseholders and Indigenous land owners did not bring invasive pests onto their lands, struggle to maintain economic viability in these regions, and gain little economic advantage from controlling these species.

The discussion paper proposes that governments 'work with risk creators where possible to assist adoption of risk management measures as part of normal business practices'. If the risk creators are themselves government instruments or agents, then government has the responsibility and the means to ensure they adopt best practice risk management protocols.

If the risk creators are not agents of the government, the relevant Government agency should set regulatory standards insisting on adoption of best practice risk management measures as part of 'business as usual'. If the cost of acceptable risk management renders the risk-creating activity economically unviable, then it clearly delivers a net negative impact and should not proceed.

Other issues

Protection of assets from invasive species on Indigenous-held land that does not sustain a profitable pastoral enterprise can be considered wholly as a public benefit. The efforts of Indigenous land and lease holders to control invasive species should be incentivized in recognition of the public benefits this provides. This public benefit is additional to other social, environmental and economic benefits that are achieved by enabling Indigenous people to remain on their traditional lands and care for country.

The rangelands community of pastoralists and Indigenous land owners has a strong desire to manage ecological assets sustainably and it is well aware of the threats to achieving this goal. It is widely accepted that the most cost effective way to manage public ecological assets in the vast rangelands is to 'pay the people who want to be there (to do it)'. In broad terms, this comprises Indigenous landholders and pastoralists. Stewardship arrangements in which landholders receive a payment to manage key ecological assets are increasingly being agreed (for example, Territory Conservation Agreements in the NT). Stewardship payments must, however, take into account the landholder's net ecological impact on the environment in order to justify the investment of public funds.

The ILC and NIPE are contributing through three main activities:

1. Facilitating the development of a natural capital accounting (NCA) system which will apply to rangelands management. NCA is being explored by banks active in rural finance, and some state

government agencies. However, the approach has not been investigated by these parties in the rangelands to date. The application of an NCA approach to the rangelands could deliver a reporting system that integrates the condition of assets (such as ecological assets and the livestock carrying capacity of paddocks) into traditional bookkeeping. This may enable financial valuation of the public and private benefits of managing pests and diseases in the rangelands, and such valuation could lead to the development of incentives by government and/or the finance sector to address the market failure between sustainable land management practices (including pest and disease management) and business performance reporting, property valuation and pastoral lands policy in the rangelands.

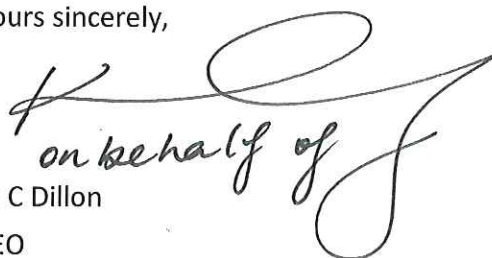
2. Applying a strategic approach to weed management across NIPE properties that mirrors the asset protection model.
3. Contributing to the sustainable management and development of Indigenous-held land through infrastructure, property management planning and protection of environmental and cultural values as part of the *Our Land Our Future* program.

Concluding Remarks

It is recommended that the final strategy take the following into consideration:

- a) The significant public benefit derived from the control of invasive species on rangelands leaseholds;
- b) The contributions of pastoral leaseholders to controlling invasive species should be recognised as a positive ecological offset that may be applied to pastoral NCA metrics, when these become commonplace;
- c) Control of invasive species on unprofitable lands held by Indigenous people should be recognised primarily as a public benefit. This benefit is complementary to the other social and environmental benefits that justify public funding to support Indigenous people to remain on their traditional lands and care for country;
- d) Increased effort and accountability should be applied to weed management in linear reserves, given that they are a major vector for weed spread; and
- e) The standards and guidelines related to biosafety, biosecurity and Prevention of Diseases developed by the World Organisation for Health (OIE).

Yours sincerely,



on behalf of

M C Dillon
CEO