

31 July 2015

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

C/- National Biosecurity Committee Secretariat

Department of Agriculture

GPO Box 858

Canberra ACT 2601

Dear Sir/Madam

**Re: Response to the Established Pests and Diseases Discussion Paper**

On behalf of the South Australian Murray-Darling Basin (SAMDB) Natural Resources Management Board I am pleased to provide the attached comments below, in response to the discussion paper *Modernising Australia's approach to managing established pests and diseases of national significance*.

**Who we are**

The SA Murray-Darling Basin Region:

- Extends from the top of the Mount Lofty Ranges across the rangelands and southern Olary plains to the NSW and Victorian borders. In the south are the River Murray Lakes and Mallee. The River Murray and vast wilderness parks are prominent features of the region. The main townships include those in the Riverland, plus Blanchetown, Burra, Eudunda, Karoonda, Lameroo, Mannum, Meningie, Mt Barker, Morgan, Murray Bridge, Pinnaroo, Robertstown, Strathalbyn and Taillem Bend.
- Has agriculture as the basis of the regional economy, including intensive irrigation along the River Murray corridor, Mallee groundwater irrigation for horticulture and the diverse enterprises of the Eastern Mount Lofty Ranges. Dryland cropping and grazing occurs in the southern areas, while grazing occurs in the north.
- Is dominated by very large areas of nature conservation in public lands and parks, Heritage Agreements on private land and on properties run by philanthropic organisations. The region is home to a number of endangered species.
- Extends over 70,000 km<sup>2</sup>, and incorporates part of 15 local government areas, with a population of ~125,000 people plus visitors.
- The statutory, community-based SAMDB Natural Resources Management Board ("the Board"), in partnership with community, industry and all three levels of government, leads direction and priority-setting for the management of natural resources in the region. It regularly monitors achievement of the regional plan, as well as its own role in the region's collective effort. The Board's own programs, delivered by Natural Resources SAMDB, are funded by Commonwealth

and State grants and NRM levies, complementing significant investment by landholders themselves. The Board is accountable to the Minister and the community.

### **Our Response to the discussion paper**

In general, there was quite a degree of similarity between the policy principles in the discussion paper and current approaches to biosecurity planning and implementation in the South Australian Murray-Darling Basin Region.

The key concern raised within the region was the need to recognise the importance of priority setting at a regional level when comparing a range of pest and diseases species, at differing stages of invasion, to decide on appropriate management actions.

To ensure adoption of policies and programs, Natural Resources SAMDB has a very strong role in ensuring that local communities have a clear understanding of the associated risks of priority pests and diseases that may affect both agricultural production and social and ecological systems.

To ensure buy-in from local communities Natural Resources SAMDB will need to ensure agreement is reached with the local community on priorities and investment through engagement, discussion and education. While Natural Resources SAMDB may not deliver all the on-ground activities, we will continue to support individual landholders through a coordinated and well informed approach.

We consider that by adopting a sound risk assessment process for review of the proposed species, considering the logic and purpose for listing, and testing whether the local communities are supportive, investment in on-ground control of a pest or disease will be seen as optimal use of limited biosecurity resources.

We appreciate the opportunity to comment on the discussion paper *Modernising Australia's approach to managing established pests and diseases of national significance* and have provided detailed responses to the consultation in Appendix A.

Yours sincerely



**Hugo Hopton**  
**REGIONAL MANAGER**

## **Appendix. A**

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

Comments on the discussion paper

On the management of established pests and diseases of national significance:

1) Are the proposed policy principles appropriate and practical?

Natural Resources South Australian Murray-Darling Basin is in support of the policy principles outlined in the discussion paper.

The key principles fit well with current NRSAMDB Board plans that supports delivery mechanisms that are more cost-effective and can continue to produce sustainable outcomes for communities in the region.

The South Australian Murray-Darling Basin Regional NRM plan aims to support ecologically sustainable development in the region and in particular to achieve an appropriate balance between environmental, social and cultural outcomes. The proposed policies align with those key aims of the Board.

2) Are the proposed policy principles sufficient?

The Board's regional plan also supports those key policy principles that seek to foster a landscape approach to managing natural resources where social and ecological systems are considered together. While the discussion paper outlines key points that support a landscape approach there may be an opportunity to expand some of the points to ensure that the landscape approach is well catered for in the document.

Comments for consideration include :

The discussion paper may be lacking in terms of marine and freshwater environments.

Any asset based approach should be considered in the context as a multi species/ threat management approach and this approach needs to include the management of those pests and diseases that threaten all key facets to protect primary production productivity and the conservation of biodiversity

On the management of established pests and diseases of national significance:

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

All of the established pests and diseases of national significance should only be considered where a rigorous risk management approach is undertaken, similar to the model that South Australia has adopted for its approach to pest plants and animals and any listing new species should not be open- ended.

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?

When considering the merits of the review we need to consider the following :

Whether the affected industry participants continue to support the resources to manage the pest or disease. This applies particularly when considering widely established pests, as the established pest management does not work if you don't

have industry buy-in. Government subsidising control of widespread pests and diseases is fraught and not considered sustainable.

Using the risk assessment for review, considering the logic and purpose for listing, considering the State and District management plans and testing whether the local communities are still supportive through engagement, discussion and education.

For example the SA Pest Risk Management Systems (for weeds and pest animals) are a surrogate for full cost benefit approach to determine optimal management of a pest, based on its stage of invasion and feasibility of control

What is an appropriate time for such a review?

Once declared a pest/disease of national significance, a national plan should be implemented through 5 year programs (to allow for control measures to take effect). Then review annually to determine whether those identified stay listed as “nationally significant”

On the management of established pests and diseases of national significance:

5) Are the proposed roles and responsibilities clear, particularly in relation to your role?

Need some agreement on the principles in a national approach. Is this about industry codes of practice rather than government agencies taking the lead?

6) Are the proposed roles and responsibilities appropriate and practical?

For widespread issues that get a lot of interest nationally – how do you harness community and/or industry support? The core of the discussion paper – where does commitment lie? Can this inform what is nationally significant? There is a vast difference between a species that is ‘just established’ (and deemed non-eradicable) and widely spread pests and diseases. Essentially, we need to know whether a sub-continuum within established pests/diseases of local-regional-state-nationally is established. The management response varies markedly according to how widespread a species is.

On the management of established pests and diseases of national significance:

7) What are the issues with establishing and maintaining effective collective action?

Policy framework must not focus efforts at either extremes of the biosecurity continuum. Much of the most strategic work done by NRM is at the early stages of invasion to contain further spread. There needs to be genuine commitment to implementing national strategic plans for species of national significance.

Consideration needs to be given to what is affordable for primary producers – what will be the focus of landholders?

This model should recognise that if a community group or leader wants to focus on a widely established weed – that’s their role, with limited advice from government.

Don’t want to lose investment in biocontrol – eg. RHD – don’t want a policy signal to create a perception there won’t be programs for public good. Need to address market failure. R, D & E for biocontrol and other innovative methods of integrated control is one of the best investments for govt and industry for established pests – more so than just focusing on on-ground control programs for few, high priority assets in the landscape.

Consideration needs to be given to the role of governments – R, D & E – for improved methods for control to support primary producers.

The emphasis of the SA Government priority regarding Premium Food and Wine from Our Clean Environment is to support primary producers.

8) How can the coordinated approach be best implemented across the various stakeholder groups?

The current hierarchy of management will see international and national issues highlighted and discussed at the national level, with delegates nominated to attend from the various states. The delegates will need expertise in the relevant field of pests and diseases. Local priority issues can be discussed utilising the bottom up approach through feedback from the community and industry and environmental groups and filtered through a sound risk management approach through the NRM Boards and relevant Groups in collaboration with NRM Biosecurity under the direction of Primary Industries and Regions SA. Regular feedback in regard to identified risks and progress of management needs to flow back to the community in a reverse process.

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

The NRM Board and Groups have a very strong role in ensuring that local communities have their say and local priority issues will continue to be addressed.

To ensure buy-in from local communities the Regional NRM Boards will need to ensure that we come to a consensus with the local community on priorities, through engagement, discussion and education. While Governments may not undertake on ground activities, they can support individual landholders through a coordinated and well informed approach.