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Comments:

NCSSA consider the responses conducted since NEBRA was adopted have been effective in responding to the outbreaks of invasive ants however recommend that the decision-making processes could be improved to achieve better outcomes. We acknowledge that NEBRA was largely modelled on the two existing industry deeds – the Emergency Animal Disease Response Agreement (EADRA) and the Emergency Plant Pest Response Deed (EPPRD) yet does not have the environmental equivalents in terms of industry/sector bodies of these deeds that provide much of their strength concerning pests of concern for agriculture. It is critical that there be a consistent approach to environmental invaders, whether they are considered under NEBRA or one of the other agreements.

We believe there are a number of improvements that could be made to NEBRA to strengthen its capability to respond to emerging threats over the next 2 decades and beyond including:

- Development of emergency response plans for high priority outbreaks that pose a threat to the environment as have been developed for EADRA and EPPRD.
- A requirement for it to be mandatory for the National Management Group to seek and have regard to advice from scientific and technical experts when making a determination about whether to proceed with or continue eradication.
- A requirement for all assessments produced by the consultative committee to be reviewed by the environment department of each jurisdiction participating in the National Management Group.
- Inclusion of species listed under state or territory laws in the “nationally significant” category, particularly where they only occur in that state or territory, are listed as threatened by the IUCN or through other rigorous scientific assessment processes.
- Expansion of the “ecologically valuable places” category to include ecological communities listed as threatened under state or territory laws or otherwise known to be threatened.
- Inclusion of all wetlands in The Directory of Important Wetlands in Australia.
- Increased transparency and accountability on responses to outbreaks, the reasons for decisions and information relied on for decisions, including assessments of national significance.
- Establishing a national fund with contributions from all federal, state and territory governments to provide funds for an initial response to facilitate effective early action while further information is obtained to inform a decision about a longer-term response.

- Greater adherence to the precautionary principle as required under the Convention on Biological Diversity.

NCSSA considers that a major flaw in NEBRA (and other biosecurity response agreements) is the need to achieve consensus of all members of the National Management Group for eradication to proceed, and the need for unanimous support for cost-sharing arrangements. This allows any one government (and any one industry member in the case of EARD or EPRD) to veto an eradication attempt. Similarly, NCSSA consider the requirement for decisions of the consultative committee to be made by consensus is inappropriate.

We strongly recommend that stringent criteria are developed in terms of which outbreaks should be progressed to the NBMCC and which ones should be closed prior to NBMCC consideration.

Is this submission confidential? No

Do you agree to be contacted about your submission? Yes