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NEBRA Review Secretariat
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To the NEBRA Review Secretariat

NATIONAL ENVIRONMENTAL BIOSECURITY RESPONSE AGREEMENT REVIEW

Thank you for the opportunity to provide comment on the National Environmental Biosecurity Response Agreement (NEBRA) review. The Wet Tropics Management Authority is established under the *Wet Tropics World Heritage Protection and Management Act 1993* (WT Act) to ensure Australia's obligation under the World Heritage Convention is met in relation to the Wet Tropics World Heritage Area (WTWHA). The Wet Tropics World Heritage Area lies between Townsville and Cooktown. It comprises 894,420 hectares (about 0.5% of Queensland) of protected lowland and mountain rainforests. Despite its small size, the WTWHA is home to an exceptionally high proportion of biodiversity. The Area is also culturally rich, comprising the lands of people from more than 18 Rainforest Aboriginal tribes – living in and around the World Heritage Area for thousands of years and using traditional practices for managing country.

Although the Wet Tropics is a very small biogeographic region, it is characterised by a wide range of climates (encompassing tropical, subtropical, warm-temperate and monsoon climatic zones), a wide range of geologies and soil types, a large number of different vegetation community types, and a long and favourable growing season. These factors make the region susceptible to invasion by a very broad range of invasive species originating from a large range of climatic zones and environmental conditions. Thus the underlying environmental drivers that promote its natural biodiversity are also responsible for the region being disproportionately vulnerable to invasive species. The Wet Tropics Management Authority reported on these threats and risks in its annual State of the Wet Tropics Report - [2010-2011 Biosecurity Theme Report](#).

The Wet Tropics bioregion already experiences more environmental pest and disease incursions than most other parts of Australia. The region will continue to face greater risks and increased potential for incursions due to its geographic profile, population patterns, proximity to Asia, international airport and port, trade diversification, climate change, increased movements of product and people, and changing tourism markets.

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Biosecurity threats are interacting with other drivers of environmental change in the Wet Tropics, including climate change. Rainfall is predicted to become more seasonal with a wetter wet season and a longer, dryer dry season. Cyclone intensity is predicted to be greater creating risks of more frequent major ecosystem disruption as witnessed after Cyclone Larry in 2006 and Cyclone Yasi in 2011. The El Niño phenomenon is predicted to occur more frequently causing more frequent and severe droughts.

The following component of our submission provide responses to specific queries raised in the Review documents.

1. Purpose of the NEBRA

- 1) Do you think the responses conducted under the NEBRA accurately reflect its purpose and help to achieve its outcomes?
- 2) Do you think the agreement is a suitable mechanism to respond to environmental biosecurity threat in the future (i.e. 10-20 years from now)?
- 3) Do you think that the definitions used in the NEBRA are clear and appropriate?

The Authority believe the definitions of a pest or disease of national significance should incorporate impacts on Matters of National Environmental Significance more explicitly. For instance, the definitions should include impacts on a World Heritage Area, Ramsar wetland, or a listed threatened species or migratory species. Environmental impacts on these Australian Government responsibilities under the Environment Protection and Biodiversity Act 1999 are considered to be of national significance and addressing such threats will help in fulfilling Australia's international obligations as parties to such agreements.

2. Roles and responsibilities under the NEBRA

- 4) Do you consider the roles and responsibilities outlined in the NEBRA to be clear and appropriate? If not, how do you think they could be improved?

The Authority suggests expanding section 5.4 to incorporate building awareness and stewardship by engaging, educating, and informing the Australian community about the impacts of invasive pests and diseases and the need for an early and effective response to maximise mitigation and ensure long term benefits.

- 5) Are these roles and responsibilities compatible with recent changes in Australian (Commonwealth, state and territory) biosecurity legislation?
- 6) How could an increased, but accountable, role for private beneficiaries and non-government stakeholders be incorporated into the NEBRA?

Non-government stakeholders such as conservation groups and community groups associated with Natural Resource Management groups can be an effective supplementary

task-force for eradication programs by participating in voluntary community activities. Such an approach can realise considerable savings to program budgets. An example of this has been the very successful integration of some of the Russett Park community into the control of yellow crazy ants in their community near Kuranda, a program coordinated by the Wet Tropics Management Authority.

The complexity of shared roles and responsibilities in the area of environmental invasive species is that there is usually no clear beneficiary organisation or organisations; and therefore there is no obvious funding source. For shared responsibility to be successful in this space, Government does have an obligation to provide adequate training and education to facilitate community mobilisation.

3. Decision making and governance

7) Do you think the NEBRA decision making framework is clear and appropriate? Are the outcomes of these processes reflective of the criteria on which they are based?

The Authority would recommend that some flexibility in application of eligibility criteria be available. The Authority believes there are situations where a formulaic approach could eliminate qualification under national significant criteria.

Management of environmental pests and diseases in the national interest should also allow for a regional focus on protection of areas of high biodiversity and threatened species. Decisions based solely on national or state-wide criteria may not take into account the prevention or control of impacts on particularly special areas such as World Heritage Areas. For example, when eradication of yellow crazy ants was no longer considered possible in Queensland due to numerous new outbreaks across the state, resources for control in the Wet Tropics were diminished without consideration for the special values of the World Heritage Area. Any cost-benefit analyses within the decision-making framework needs to give due weight to the natural and cultural heritage significance of the landscape. Agreed principles are needed on how to derive environmental costs/benefits which are often overlooked. (WTMA has subsequently secured funding for an eradication program within and adjacent to the WHA).

8) Do you think there should be an increased role of non-government stakeholders in the decision making process? If so, how do you think this might be achieved?

The Authority believes an increased role for non-government stakeholders would improve decision making. To better involve the ultimate stakeholders in biosecurity, the general community, the Authority recommends to build in community representation to the NBMCC

via a consultative committee/forum to represent the community, provide advice and a conduit for community information/education rather than relying solely on technical input.

4. Delivery of response activities

- 9) Do you think the pre-response requirements of the NEBRA are clear and appropriate? Are they practical for smaller jurisdictions?
- 10) Could the guidelines and criteria for the technical requirements of initiating a response be made more clear and appropriate? If so, how?
- 11) How could private beneficiaries and non-government stakeholders be engaged more effectively in response activities?

As above, building in a form of community consultative mechanism to provide advice to and receive information from the NBMCC could lead to much earlier mobilisation of the community in the crucial early stages of an outbreak before pests become established and beyond eradication.

5. Information sharing

- 12) Do you think existing information sharing networks are utilised effectively for NEBRA-related matters? If not, how do you think this might be addressed?
- 13) What untapped sources of information may be useful in preparing for and responding to environmental biosecurity emergencies?

Community awareness and engagement programs are an integral part of the early detection of and response to new incursions of invasive pests and diseases. Educating the public about the environmental, economic and social costs of such threats empowers the community to react effectively before pests can become established. All levels of government have a responsibility to ensure that the community has easy access to report suspicious outbreaks through relevant contemporary information pathways. Social media has an effective, immediate and broad-scale reach and will continue to dominate popular information dissemination into the future.

6. Preparedness

- 14) Do you think that the sharing of training and resources among jurisdictions and non-government stakeholders would help to increase preparedness for environmental biosecurity threats? If so, how might this be achieved?

Successful eradication programs require the building of community stewardship by engaging, educating, and informing the Australian community about the impacts of invasive pests and diseases and effective response measures. In particular, the Authority recognises that the most effective outcomes are those where governments work with landholders and the local community to manage the spread and impacts of invasive species.

15) What role could the non-government sector play in preparing for environmental biosecurity incidents? How could their involvement be facilitated?

Community education, participation and stewardship are vital to the success of any identification and eradication program for environmental pests. The role of landholders (on-ground eyes and ears), the pest control industry and the community in identifying, eradicating and controlling spread on their properties has been key to the successful implementation of the Authority's current project to eradicate yellow crazy ants in and around the Wet Tropics World Heritage Area near Cairns. The project demonstrates effective, coordinated partnerships between governments, the agricultural industry, landholders and local communities. The project also demonstrates a strong collaboration between a wide range of partners including the Australian Government, Biosecurity Queensland and other Queensland government departments, Cairns Regional Council, Conservation Volunteers and Green Army teams, CSIRO, James Cook University, rural and suburban landholders, Traditional Owners, pest controllers and a range of local media and local industry such as earth-movers and land developers.

16) Do you think it is feasible to develop a list of Australia's priority environmental pests and diseases? If so, how might this be achieved?

The Authority supports the findings of the Senate report 'Turning back the tide – the invasive species challenge'¹ which recommended that several national invasive species control classes be developed, with official lists under each, and agreed by the Australian and all state and territory governments. These lists include the:

- National Quarantine List of high-risk invasive species that may or may not have already invaded Australia, and whose early detection will enable cost-effective eradication.
- National Alert List of high-impact invasive species that are naturalised, have a restricted range and whose eradication is feasible and cost-effective.
- National Control List of high-impact invasive species that are naturalised and generally widespread, and whose containment or control will help protect the values of areas of national environmental significance.

Such lists would assist in the early identification and detection of invasive species which threaten the environment and agriculture. They would also promote more effective prevention and management strategies and promote community awareness. It is vital that we learn more about the most common paths for pests arriving in Australia and how they can subsequently move around the country. (WTMA response to Senate Environment Biosecurity enquiry 2014).

¹ The Senate Environment, Communications, Information technology and the Arts reference Committee (2002), Turning back the tide – the invasive species challenge: Report on the regulation, control and management of invasive species and the Environment Protection and Biodiversity Conservation Amendment (Invasive Species) Bill 2002

7. Funding arrangements

- 17) Do you think current cost sharing arrangements under the NEBRA are appropriate and equitable?
- 18) How might private beneficiaries be engaged in cost sharing arrangements?

Cost sharing by private beneficiaries should continue to be decided on a case-by-case basis because of the diversity of circumstances in which this arises. Community groups/NGOs and industry sectors aligned with Natural Resource Management groups may become involved through in-kind voluntary roles which can be very effective and save considerable program costs as part of community-based control projects.

8. Managing the NEBRA

- 19) How important is it that the NEBRA is consistent with other biosecurity response deeds and agreements? Are there any particular inconsistencies that should be addressed? For example, do you think that transition to management provisions should be incorporated into the NEBRA?
- 20) Do you think the requirement for an ongoing NEBRA administrative group is practical?
- 21) How efficient and appropriate are the NEBRA custodian processes? How might they be improved?

The Authority considers that 'transition to management' provisions applicable to the Animal and Plant Health deeds should equally apply to matters affecting the environment. Transition to management in industry situations is driven by vested interest whereas the environment has no capacity for cost sharing arrangements other than the voluntary contribution of communities.

Thank you once again for this opportunity to provide comment on the review. If you have any further enquiries about the Authority's comments, please contact Scott Buchanan, Executive Director WTMA on 07 4241 0501 or scott.buchanan@wtma.qld.gov.au.

Yours sincerely



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