### **SUBMISSION** Draft Queensland Biosecurity Strategy 2017-22

Submission by Invasive Species Council, Queensland Conservation Council and Wildlife Preservation Society of Queensland







Keeping nature safe from dangerous new invaders

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### Introduction

The Invasive Species Council, Queensland Conservation Council and the Wildlife Preservation Society of Queensland appreciate the opportunity to comment on the draft Queensland biosecurity strategy 2017-22.

We strongly endorse the key elements of the draft biosecurity strategy.

The development represents a new inclusive approach to managing biosecurity risks and is a great demonstration of the partnership approach. We are highly supportive of this approach.

#### Goals

We are supportive of the goals as presented in the draft.

To further the goal of prevention: "prevent exotic pests and diseases from entering, spreading or becoming established in Queensland" there is a need to ensure that this is reflected in the priorities of each of the six theme. This emphasis is not overtly stated sufficiently throughout the theme focus areas at present.

### **Guiding principles**

We are supportive of the guiding principles as presented in the draft.

## Theme 1 – Collaborative governance and leadership

This theme and its focus and aspirations are supported

The conservation sector is at a distinct disadvantage compared to other sectors. With an over-riding public interest rather than commercial interest in participating, there are limited resources (people and time) available to fully participate. The conservation sector is very diverse and disparate and almost entirely voluntary.

There is a need to recognise these limitations and find ways of overcoming the obstacle for greater involvement in collaboration and leadership.

# Theme 2 – Every Queenslander plays their part

This theme and its focus and aspirations are supported.

Greater use of the general biosecurity obligation, supported by clear standard setting and education is essential to help achieve this.

For new incursions, government agencies must be prepared to share information and indicate potential areas of spread. This did not occur with myrtle rust when Wildlife Queensland was aware that the rust was on Fraser island yet government agencies refused to confirm that in the early stages. This is also relevant to Theme 4 and the role of the community in surveillance.

### Theme 3 – Empowered to act

This theme and its focus and aspirations are supported.

Further to our comments under themes 1 and 2 there will be challenges in the ability of the conservation sector to contribute. Some of the challenges in the agricultural sector that are identified (changes in the membership base of traditional representative groups) also apply to the conservation sector.

### Theme 4 – Bright ideas and better ways

This theme and its focus and aspirations are supported.

The community and the conservation sector can play a very useful role in surveillance. Some of the barriers to community-led surveillance are the lack of information about surveillance targets (ideally targets aligning with the interests of the community such as new environmental invaders) and providing easy to use tools to collect data.

Note the comment in Theme 2 about the importance in sharing information when a new incursion occurs.

## Theme 5 – Valuing and building on our investments

This theme and its focus and aspirations are supported.

There is a need to develop a way to properly value non-economic outcomes when considering biosecurity priorities. Otherwise priorities will be selected based on the ability to identify the greatest cost, downplaying the importance of acting to protect difficult to cost values such as ecosystem health, species abundance (or extinction) and social amenity.

There is a need for a greater emphasis on the importance of investing in research including on biocontrols and for more effective methods of management.

### Theme 6 – Better intelligence systems

This theme and its focus and aspirations are supported.

Include also a focus on identifying emerging trends (including new industries) that will bring new biosecurity risks and develop preventative strategies. Horizon scanning could be mentioned.

## Equalising the attention paid to the environment

The Queensland Government is aware and acknowledges that traditionally the main biosecurity focus is on affording protection to primary industries while social and environmental issues are secondary. This is also highlighted in the draft report of the independent review of the Intergovernmental Agreement on Biosecurity.

A real commitment by the Queensland Government to provide a greater focus on the social and environmental issues would more than likely stimulate more interest from those sectors. There would be value in flagged this intention in the strategy.

### The role of government

The special role of the state and federal governments in the biosecurity system is important and requires greater clarification. This is particularly in relation to risk identification, preparedness, early responses, compliance and research.

The resources freed up through implementing the draft strategy – by sharing the load and encouraging other members of the community to play a more active role, especially for established and widespread pests, should allow government to focus more on activities that only it can fulfil.

The strategy should reflect the Queensland government's renewed commitment to those particular activities it will carry out and provide confidence that there these will be given a high priority within government.

One possible way to do this without dominating the strategy and ensuring that others are expected to fulfil their roles too is to articulate government's activities through a Queensland Government Statement of Intent. Details of government activities could also be included in the co-developed action plans, but some of these might sit outside of the action plans given the specialist nature of the work, such as research and development plans, preparedness and response plans etc.

### The role of the conservation sector

The conservation sector stands willing to play an active role in Queensland's biosecurity system. The sector is broad, including community conservation groups, recreation users, naturalists, bird watchers, scientists, conservation land managers, bushcare, landcare and bush regeneration groups and environmental educators.

While we cannot speak for the entire sector, we believe there is a genuine willingness to contribute.

It was unfortunate that the Invasive Species Council had no capacity to be directly involved in developing this strategy through the writing group. This represents an example of the need to recognise the differences between agricultural and environmental biosecurity, including in the resources of key stakeholders, which necessitates support for enabling equal participation by less well-resourced interest groups.

### **Case studies**

The current case studies in the draft strategy are predominantly agricultural.

It would be good to include environmental case studies such as yellow crazy ants or myrtle rust (this could help explain the need for prevention and surveillance to keep out new strains and new plant diseases) and Asian honey bees (this could demonstrate the need for much more focus and research on biodiversity consequences).

### **Resolving conflicts**

A shared responsibility will work well when commercial or personal interests align with managing and reducing biosecurity risks. Unfortunately, there are many activities where there is a short-term commercial incentive to carry out risky biosecurity activities.

In the spirit of participation and transparency there would be benefit from a more transparent way of resolving conflicts between the goals of biosecurity and other endeavours, such as when invasive species have value for industry.

Activities that create environmental risk may include the promotion and growing of invasive pastoral grasses or ornamental plants, or the legal keeping of high risk pets.

There are also cases where some people may not undertake costly or time-consuming biosecurity work such as undertaking weed or pest control on their properties or washing down their machinery, actions that impact on others in the community.

In this case the actions by these 'free-riders' are best remedied by education and promotion of the general biosecurity obligation supported by a strong compliance program.

A way to address these issues needs to be included in the strategy.