



Biosecurity NSW  
Department of Primary Industries  
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4 December 2012

Dear DPI,

### **Submission to draft NSW Biosecurity Strategy**

The Invasive Species Council is pleased to be able to comment on the draft NSW Biosecurity Strategy. We provide a late submission because we were only notified about the draft strategy about a week before submissions closed. We would have liked more time to review the document and consult with our conservation NGO colleagues, but this was not possible despite the interest of these groups in biosecurity and the importance of the issue.

We wish to make some general comments about the strategy and attached a series of documents that provide our views on biosecurity in general that are applicable to NSW.

In general we commend the development of the strategy and the goal of bringing greater attention to environmental biosecurity.

The strategy could be improved by:

- Adopting clear targets for biosecurity policy, developing indicators, collecting data and reporting regularly on progress made. The biosecurity strategy should, as a minimum, draw on and provide a framework for implementation of the following existing government targets for invasive species:
  - Target 4 of the statewide targets for natural resources adopted by the NSW Government in 2005: "By 2015 there is a reduction in the impact of invasive species." This target is overseen by the NRC and implemented by catchment management committees.
  - The pest and weed target in Goal 22 of the NSW State Plan 2021 that applies to NPWS reserves: "Reduce the impact of invasive species at priority sites on NPWS parks and reserves leading to a positive response of native biodiversity at 50% of these sites by October 2015".
- Adopting key recommendations in *Stopping NSW's Creeping Peril* (attached) including:
  - Restricting new plant introductions to those assessed as safe (a 'white list' approach)
  - Eradicating new invaders where feasible and preventing the spread of others into new areas
  - Requiring a duty of care and implementing a 'polluters pays' principle
  - Drawing on Federal laws to address national significant threats (the new *Biosecurity Bill* provides these powers)
  - Increasing the priority of weed management to adapt to climate change (mention of climate change was made in the policy)

The Invasive Species Council campaigns for better laws and policies to protect the Australian environment from weeds, feral animals and exotic pathogens.

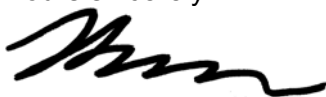
- Developing governance arrangements that reflect the priority of weeds for both the environment and agriculture and provide for regional authorities to implement weed plans (the Office of Environment and Heritage should be given more direct involvement in environmental biosecurity)
- Supporting research and education programs
- Acknowledging a role of the community in surveillance, responding to incursions, managing invasives, identifying research priorities and working out the best ways to engage with the community.
- Involving the community to a greater extent in all aspects of environmental biosecurity as a genuine partnership. There is a strong public interest in environmental biosecurity, and while this provides the need for a strong role for government, this should be shared with the community. This may require providing community capacity to support this involvement.
- Elevating the priority of environmental biosecurity to the same level of importance as industry-based biosecurity. There are historical biases that need to be overcome and it is more difficult to quantify the economic benefit of providing environmental biosecurity.
- Allocating new resources to biosecurity, including contingency funding for responding rapidly to new outbreaks
- Supporting the proposed [Environmental Health Australia](#) that will operate in a similar way to Plant Health Australia and Animal Health Australia to work in a collaborative way between governments, industry and the community.
- The conflict between recreation hunting and feral animal control objectives needs to be referred to and policies put in place to give priority to feral animal control eg for deer.

Attached are:

1. **ISC and other conservation groups' submission to the draft Biosecurity Bill**, presently before Federal Parliament. This submission endorsed by eighteen other conservation groups outlines key principles for biosecurity legislation that are also applicable to NSW biosecurity legislation and policy.
2. **Stopping NSW's Creeping Peril** published in August 2010. It highlights improvements needed to responding to threats from weed in NSW that could be included in the NSW Biosecurity Strategy (referred to above)
3. **Engaging the environmental community sector**, a paper presented in November 2012 to the Biosecurity Advisory Council. This paper explains the benefits of properly developing a partnership with the community and how to go about it. It is directly applicable to NSW where the engagement with the community is not as developed as the engagement with industry.

You may contact me on 0438 588 040 or email [andrewcox@invasives.org.au](mailto:andrewcox@invasives.org.au).

Yours sincerely



Andrew Cox  
President