



Non-indigenous Birds Stakeholder Consultation
Invasive Plants and Animals
Biosecurity Victoria
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Dear Biosecurity Victoria

The Invasive Species Council appreciates the opportunity to provide feedback on the **Non-indigenous Birds Stakeholder Consultation Discussion Paper**.

The Invasive Species Council is a national community organisation that advocates for stronger laws, policies and programs to protect the Australian environment from invasive species. We are guided by the latest science and focus in particular on emerging or future threats.

We will provide general comments about the paper then answer each of the questions posed by the discussion paper.

The keeping of non-indigenous birds poses a serious risk to the natural environment. Good policies and laws on the keeping on non-indigenous birds would limit the establishment of new invasive species and provide a strong economic return for the Victorian Government and the Victorian community by minimising long-term control costs and avoiding environmental and other damage.

The threat posed by the Indian Ringneck, as exemplified in the discussion paper, offers a strong argument about why action on the keeping of non-indigenous birds is required.

The keeping of non-indigenous birds, plants, aquarium fish and pets collectively poses the main in-country pathway for new species that threaten the Australian environment. As a result, despite the imposition of some burdens on these sectors, there is a strong case to improve the biosecurity regime targeting these sectors. Such a regime would include:

- strong regulation of the sale, movement, disposal and breeding of all species except low risk species
- phase out of the highest risk species
- 'risk-creator' fees to recoup administrative and early response costs and provide disincentives for irresponsible trade and ownership
- an enforcement framework to prevent the smuggling of non-permitted species into Victoria
- interstate coordination and assessment of risks to other states when species are assessed (in acknowledgement of the difficulty in regulating interstate movement)
- strong enforcement for non-compliance
- a whitelist approach that bans all new introductions unless they are assessed as low risk

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

- rapid response to breaches and new outbreaks

The Whole of Government Biosecurity Strategy for Victoria and the Invasive Animal and Plants Policy Framework highlight the need for a risk-based approach. In particular, the strategy states:

We need to ensure we better integrate and prioritise activity towards risks with potentially significant impact and those with the highest likelihood of occurring.

...

the system cannot guarantee 'zero risk' of biosecurity incidents, as new pests and diseases can emerge at any time without warning, however, the earlier new threats and issues are detected, the greater the chance of successfully and cost effectively managing them.

And the framework states:

The general principle of government involvement in invasive species management will be that government invests to maximise public benefit. This investment may be necessary due to market failure or to the role of government as manager of public land and waters. Intervention will only occur where the benefits outweigh the costs.

...

Analyses of biosecurity programs generally show that prevention provides a higher return on investment than eradication, eradication is better than containment and containment is better than managing impacts of widespread invasive species.

...

Preventing high-risk invasive species from establishing is the most cost-effective approach to managing the threat that they pose, yet considerable resources and planning are required to maintain prevention of a large number of species.

And the Victorian DE&PI website, under the heading 'Focus on Prevention' states:

The best investment of the Victorian public's money is in preventing new species from entering the State. It costs far less to stop invasive plants and animals from arriving than it does to remove them once they have established.

Reforming regulations for the keeping of non-indigenous birds is one of the most obvious areas warranting a strong focus on prevention, consistent with Victorian government policy, leading to long-term benefits and major cost savings.

The keeping of non-indigenous birds is a good example of market failure that requires government leadership: it poses a serious risk to the environment but there are few financial or other incentives to minimise risk. People are attracted to keep colourful and exotic birds from different countries, regardless of the risk of their establishment in the wild, and while keepers generally would not want their birds to escape, there is a high likelihood of some being careless or uncaring about risk or regarding release as the best option when they tire of keeping.

The keeping of non-indigenous birds is an example where a small investment in regulation by government will achieve high returns. Reducing the risk of non-indigenous birds of establishing is far easier and cheaper than trying to eradicate or control birds when they escape and remediating the

damage they cause. This accords with the Victorian Government's commitment to a risk-based approach to invasive species management.

The keeping of non-indigenous birds is a good example of where the source of the risk can be easily identified and a) pre-emptive action taken to reduce or eliminate that risk and b) costs recouped from the industry that is the 'risk-creator'.

The Invasive Species Council thus advocates a different approach to that proposed in the discussion paper, one that is more consistent with the risk posed by the keeping of non-indigenous birds and the principles of the Victorian government outlined in the Biosecurity Strategy and Invasive Animal and Plants Policy Framework: minimise the risk of new species establishing in the wild by strengthening regulation of the keeping of all but low risk birds and recouping from the keepers of non-indigenous birds the costs of regulating the activity and responding to new outbreaks.

The discussion paper would be assisted by providing a definition of high risk and explaining the risk assessment process that would be carried out to determine that a bird is designated as high risk.

Response to Discussion Paper Questions

Q1. Do you agree with the need for better policy direction for the management of non-indigenous birds in Victoria?

Yes. Since there is presently no detailed policy in this area, it is far better to create a new policy than to have no policy given the major risks posed on the environment by non-indigenous birds and the opportunity to reduce that risk.

Q2. Do you agree with the scope of the proposed approach?

No, the scope of the approach needs to be broader. The range of activities covered are suitable as a starting point, but need to be broader to properly address the risks posed by non-indigenous birds. The discussion paper simply accepts the status quo as the starting point for the new policy without addressing the existing risks, which are the premise of the discussion paper:

the risks associated with non-indigenous birds in Victoria are not being adequately managed under current legislation. Victoria's current approach is inconsistent with other states and territories and national policy, and does not align with Victoria's risk management approach to the management of invasive animals.

We disagree strongly with the statement in the paper about the scope that states that “The proposed approach will not impose any significant regulatory burden on the current keeping of non-indigenous birds”. Regulation is needed to address existing risks and is a cost-effective way of doing so.

The paper also does not propose to address the high risk posed by game birds that are not widely established in the wild. The paper says: “DEPI does not consider it reasonable to change the current management of non-indigenous quail, pheasants and partridges.” There is no explanation of the reasons for this position nor an explanation of the risk.

Following are the results of risk assessments of three of the five game birds listed in the Wildlife (Game) Regulations 2012 compiled by the Invasive Animals CRC in 2009:

Game Bird	Establishment Risk (Bomford 2008)	Threat Category (Vertebrate Pest Committee 2002)	Environmental Impact	Agricultural Impact
Californian Quail	Extreme	Extreme	Competes with species of native quail. (Department of Conservation, WA)	Reported to damage grape and strawberry crops and germinating clover seed and other grain crops. (Birds Australia)
Pheasant	High	Extreme	Pheasants need access to live protein (mealworms or clean maggots) as inadequate protein may exacerbate their tendency to cannibalism. They may also be likely to eat other bird species. Pheasants are also prone to eye infections and worms creating the possibility of a health issue if they are in sufficient numbers.	Expanded in California in association with rice farms. (Leopold 1985)
Partridge	Extreme (<i>Alectoris graecia</i>)	Extreme		

The scope of the paper should be expanded to address this issue. We are not aware of whether the listed game birds are currently established in the wild in Victoria and there is no evidence that a risk assessment of the potential for their establishment in Victoria having been carried out. A risk assessment must be presented before allowing their designation as game birds. The release of game birds for hunting is a high risk activity that would assist their establishment.

The paper does not list all the non-indigenous birds presently known to be in Victoria and the extent of their keeping, nor provide an assessment of the risk of these birds to the environment, the economy or social values. Such a risk assessment should be a prerequisite to determining the policy for managing the keeping of non-indigenous birds.

We also disagree with the following statement near the start that downplays the role of government in invasive species, particularly those threatening the environment:

There is a potential role for government to manage adverse effects of invasive species on the economy, environment and social amenity.

The government has a critical leadership and regulatory role in managing environmental invasive species.

Q3. Do you think that the proposed approach will reduce the likelihood of non-indigenous birds with high pest potential establishing self-sustaining populations in the wild?

No. Based on the scope and details of the approach provided so far we do not think that the approach will lead to significantly less likelihood of new bird populations establishing in the wild. It appears that the approach will lead to no change in the current management of non-indigenous birds.

No additional regulation is proposed, no permits will be required, no fees are to be imposed on keepers.

Q4. Do you think the proposed approach offers enough flexibility to manage non-indigenous birds into the future (e.g. climate change, population growth)?

No.

Under climate change, the risk to the environment posed by some bird species will change. This needs to be built into risk assessments applied to all species of non-indigenous birds, with the inherent uncertainty acknowledged by adoption of a precautionary approach.

Q5. Which aspects of the proposed approach do you support?

We support the ban on the import, keeping and trade of high risk non-indigenous birds presently not in Victoria.

We also support the intention to raise awareness of the risks posed by non-indigenous bird species and in promoting responsible bird ownership.

On their own we do not believe the measures proposed in the discussion paper will be enough.

Q6. Can you suggest how the proposed approach could be improved?

The proposed approach could be improved by:

- strong regulation of the sale, movement, disposal and breeding of all species except low risk species
- eradication and phase out of the highest risk species
- 'risk-creator' fees to recoup administrative and early response costs and provide disincentives for trade and ownership
- an enforcement framework to prevent the smuggling of non-permitted species into Victoria
- interstate coordination and assessment of risks to other states when species are assessed (in acknowledgement of the difficulty in regulating interstate movement)
- strong enforcement for non-compliance
- a whitelist approach that bans all new introductions unless they are assessed as low risk
- rapid response to breaches and new outbreaks

If this approach was adopted, the keeping of highly invasive species such as the Indian Ringneck and the Barbary Dove would be heavily regulated and ultimately phased out from Victoria.

Offering no regulation for medium risk bird species will result in a proliferation of these birds in captivity, ultimately increasing the possibility of establishment and making a medium risk more likely to cause damage. Given the need to focus on prevent, adopting a low-risk approach is far more sensible. It will be extremely difficult to place new controls in the future when it is later realised that the medium risk birds needed to be regulated.

Game bird species are at risk of establishing in the wild and this risk should be better managed. They must be subject to the same risk management approach as other non-indigenous birds. Hunting at present provides an incentive to introduce and spread these game birds into the wild in Victoria.

There is also no mention of resources needed to administer the threat or potential funding sources (government, industry and others). As mentioned earlier, a small investment in this area will have a major return.

DE&PI needs an improved mechanism to allow easy reporting and to quickly respond to new incursions. There is no mention of these aspects in the discussion paper.

Q7. How will the proposed approach affect your organisation and/or sector?

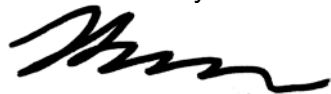
The proposed approach will fail to achieve two of the three aims of the discussion paper:

- “reduce the risks associated with non-indigenous birds that have the potential to become invasive species in Victoria
- provide a framework which allows the Victorian Government to identify and manage threats to Victoria from non-indigenous birds”

The approach will retain a key threat to the Victorian natural environment from the establishment in the wild of new non-indigenous birds. This is because of the omissions outlined above.

I am happy to explain these points in more detail. You may contact me on 0438 588 040 or email andrewcox@invasives.org.au.

Yours sincerely



Andrew Cox
President