

15 May 2015

Debra Cousins
Department of Agriculture and Food Western Australia
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WA 6983
By email: biosecuritystrategy@agric.wa.gov.au.

Dear Ms Cousins

Draft Western Australian State Biosecurity Strategy

Following are comments by the Invasive Species Council on the Draft Western Australian State Biosecurity Strategy.

Overall, the strategy is comprehensive. The background information is appropriate and the five principles adequately address biosecurity at a state level. Most outcomes and strategies are appropriate. However, we have identified the following gaps and flaws that warrant attention.

Balance: There is a bias towards agricultural industries. Stronger biosecurity is even more important for the environment than it is for agriculture, because so many species and ecosystems are already under grave threat from invasive species and the values at stake are irreplaceable. There is a need to address balance across all industries, the environment and social amenity. We share the concern of Birdlife Australia that invasive birds are not mentioned in the strategy, and this applies to many other categories of environmental threats as well, including tramp ants. The 'wild dogs' case study neglects to note the benefits of protecting dingoes for suppressing feral cats and foxes, and the potential to use guard dogs to protect livestock.

Scope (p5): The term "pests and diseases" used throughout the strategy is appropriate. However, the definition in Scope of "...animal and plant pests and diseases, including weeds and animal diseases that can be transmitted between animals and humans.." is incorrect. The definition should be "animal and plant pests, and pest plants and animals". It might be argued that weeds are pests of plants but they have many other impacts eg aquatic weeds on water quality, environmental weeds on human recreational activities. Also, pest animals are not always pests of animals eg feral pigs directly damage wetlands by digging.

Importance of biosecurity to Western Australia (p5): This outline of economic, environmental and human health impacts needs to include other impacts. Under economic, biosecurity risks impact on tourism, mining (eg weed seed spread), services (eg power transmission, communication, water supplies), shipping, and recreational services (eg economic activity from boating, bushwalking, camping). Social amenity has been omitted completely from this section; it is significant and needs to be included – impact of pests and diseases on recreational activities (eg swimming, boating, bushwalking, pony club activities, gardening), fear (eg of wild dogs), and aesthetic values of landscapes. Risks impact on the built environment and cultural heritage; these could be included under environment or an expanded human amenity and health section.

Principles, Outcomes & Strategies:

1.1.2: "Industry" here could be interpreted as just agricultural industries; all industries should be included such as mining and services. Also, there is a need to work with community organisations

such as catchment/natural resource management and environmental groups. The strategy should say “industries and community bodies”.

1.2.1 and 1.2.2: These strategies are somewhat confusing as they partly overlap. 1.2.1 should focus on awareness (remove “engagement”) and 1.2.2 should focus on participation and engagement. The text on 1.2.2 takes a narrow view of community engagement. Community participation and engagement is much broader, including the activities of landcare and bushcare groups with for example on-ground action.

New 1.3: Outcome “A planning framework for biosecurity supports shared responsibilities and agreement on strategic directions (or priorities)”. The document notes some of the national agreements and plans that WA has agreed to. However, there are other national plans eg Weeds of National Significance, and it is likely that within WA there is or should be a range of state, regional and local government plans. It is important that there is clear understanding of the plans that are needed and the connections between them. There is currently no mention of planning in the Principles section.

2.1: This outcome is narrowly focussed and reflects a state government bias. Everyone has limited resources, including local governments, farmers, businesses and conservation groups. It is important that all resources are focussed on priorities and so the outcome of risk-based assessment should be “The limited resources of all parties are focussed on the highest priorities”. The decision that state government resources will be focussed on prevention and eradication appears to have already been made and should be included in the text for this outcome. Further, the current outcome is not entirely correct in that science is also a priority for state government resources (and if not, it should be). What is perhaps intended is that within the implementation of actions on the invasion curve, state government will give priority to prevention and eradication.

4.1: WA has an excellent permitted list approach to the entry of plant species to WA, which is likely to have prevented the entry of many plants with weed potential. This should be mentioned in the text with a commitment to its importance.

4.2: The wording of this outcome does not make sense. If the sentence is split into components it becomes “biosecurity response” and “biosecurity recovery” which is not meaningful. What is intended is “response and recovery capability”. The outcome should be “A high standard (or high level) of emergency preparedness and response capability (or capability for response and recovery)”.

5.1.1: As above, strategy wording is a problem. “Prevention, eradication and containment” do not apply to “assets” as written. We suggest sticking to the invasion curve wording and using “....priority knowledge gaps for prevention, eradication, containment and asset based protection”.

5.2: This outcome is about doing and applying the research, so add “developed” as in “Innovative solutions developed and applied to improve pest and disease management”.

5.2.1: This strategy is about conducting research; applying global knowledge is just a fundamental part of research so does not need to be mentioned. It is better to be concise and clear with “Conduct targeted research to develop innovative solutions for better management of WA biosecurity issues”.

5.2.2: This strategy is identifying one area of technology development without providing other priority subjects for R&D, and as such it is inappropriate. It also duplicates 3.1.1. What is needed is a strategy for the application of innovative solutions, for example, “Develop and deliver

engagement and communication strategies directed at adoption of innovative solutions by industry, government and community”.

Implementation: There is no mention of how the strategy will be implemented or who will coordinate implementation. This should be added.

Thank you for the opportunity to comment on the biosecurity strategy. We would welcome further engagement as it is finalised and implemented. I can be contacted at andrewcox@invasives.org.au or on 0438 588 040.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andrew Cox', with a stylized, cursive script.

Andrew Cox
CEO, Invasive Species Council