



Queensland Weed and Pest Animal Strategy 2016-20

Submission by:
Invasive Species Council,
Queensland Conservation Council, and
Wildlife Queensland

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Introductory comments

The Invasive Species Council (ISC), Queensland Conservation Council (QCC) and Wildlife Preservation Society of Queensland (Wildlife Queensland-WQ) appreciate the opportunity to comment on the draft Queensland Weed and Pest Animal Strategy 2016-20. The information in this submission has been submitted in the spirit of collaboration to strengthen the draft strategy but should not be construed as support by ISC, QCC or WQ for the draft strategy or any of the policies described in it.

The ISC is a national community-based organisation that seeks to reduce the environmental impact from invasive plants, weeds, diseases and other invaders. The QCC is Queensland's peak environment organisation since 1969, representing almost 60 conservation groups including ten regional conservation councils. WQ is a community environmental organisation whose 6500 members, 16 branches, volunteers, supporters and staff are united by a deep passion for wildlife and conservation, striving for the survival of species and ecosystems.

We welcome the development of a new Queensland State strategy for weeds and pest animals, and appreciate the consultative approach being taken to its development. We note that many important principles such as risk-based decision-making, the general biosecurity obligation and the precautionary principle have now been included in the Biosecurity Act 2014.

We believe the draft strategy can be significantly strengthened as outlined in this submission, to maximise the effectiveness of invasive species control and management under the new Act.

This submission is structured under the same headings as the draft strategy, for ease of reference.

We include comments under "stakeholder roles" about the predominance of agricultural and economic interests in the governance, direction and implementation of biosecurity policy. This predominance leads to inadequate attention being paid to *environmental* biosecurity- the management of impacts on the natural environment.

The final strategy must address this imbalance by boosting the biosecurity roles of environmental experts and interests, so that adequate outcomes can be delivered not only for agriculture and the economy but also for the natural environment.

We include comments at the end of the submission relating to matters not covered in the draft strategy.

Comments relating to specific sections of the draft strategy

1. Definitions

We make no comment on the definitions.

2. Introduction

We welcome the reference to the environment in the Background. It is crucial that the environmental impacts of invasive species are addressed more concertedly than has been the case to date. Therefore we also welcome the statement here that:

“The objectives of managing invasive species are to **prevent** new introductions and to **minimise** negative impacts of these species on the **environment**, the economy and the community”. (Our emphases in bold)

We do feel however that that even more active wording of this objective is called for given the extensive impacts of invasive species described in the strategy’s introduction. We propose that the word “minimise” (above) be replaced with the words “reduce to a minimum”, thus clarifying that an active reduction in impacts is the objective.

The description of Economic impacts (pp. 6-7) addresses largely agricultural impacts. We urge that the final strategy also describes the broad range of economic impacts, including detailing the economic value of impacts on the environment and ecotourism, and the economic value of impacts on utilities, infrastructure, transport, and outdoor recreation.

(We note also that the reference to the Act’s commencement- on page 5- will need to be changed to past tense should this strategy be released in its final form on or after 1 July.)

3. Purpose

We welcome the more coordinated approach to the management of invasive species flagged in the Purpose.

We are pleased to note the reference here to the environmental impacts of invasive species in the Purpose, along with economic and social impacts. We urge the replacement of the weak phrase “that will address” in the Purpose with the phrase “that will *reduce*”, as we believe Queensland should strive for national leadership in invasive species management, and to that end more ambition and direction is needed in the language of the strategy’s Purpose.

We note the reference in the Purpose to “more efficiently use[ing] resources”, and we urge that another and a necessary part of the strategy’s Purpose must be to: *Identify the resources required for fulfilling the Strategy’s Mission and achieving its Vision*. Sufficient, on-going capacity and resources, aligned with strategic objectives, are fundamentally important if impacts are to be actually addressed. This would help to avoid any tardy or episodic approaches to invasive species management funding.

4. Scope

The scope excludes overabundant native species, marine pests and crop weeds. The strategy should briefly justify these exclusions, and direct the reader to other strategies or processes which might encompass these.

As we understand it, on the matter of marine biosecurity some provisions of the Qld Biosecurity Act 2014 do apply to marine invasive species. For example, the general biosecurity obligation applies out to the three mile limit. Also, if there is a reasonable belief that a serious risk exists (e.g. of a declared prohibited marine pest being brought within the three mile limit) steps can be taken to manage that risk on a vessel without having to wait for scientific confirmation. Given that the Act does pertain to marine biosecurity (in a limited and inadequate way), we believe that there is an imperative for the strategy to cover marine biosecurity. We therefore urge that the final strategy covers marine biosecurity and describes actions to be taken at State level to place Queensland as a national leader in the management of biosecurity risks relating to ballast water and biofouling.

5. Context

We applaud the inclusion of the invasion curve diagram.

The text on page 11 downplays the role of Government in management in the latter stages of the invasion curve. Though we agree that great emphasis needs to be placed on prevention and eradication and containment, Government also has significant responsibilities and roles in on-going containment and asset-based protection.

Governments’ responsibilities here arise from the policy and funding failures that have seen so many invasive species established in Queensland in previous years. Government’s roles in the latter stages of the curve include sharing some of the responsibility for on-ground management, as well as roles in research, extension, planning, policy and regulation. Government’s role in on-ground management must focus on direct management of public lands, and support management of invasive species on private lands where there is a public interest such as areas of environmental significance. This should be clearly described in the final strategy.

We urge that an explicit note be included in this section of the final strategy describing, prioritising and providing examples of environmental assets *as integral* to the asset protection end of the curve. This will help to ensure that those reading and implementing the Strategy understand and include environmental asset protection as a matter of course (rather than perhaps assuming that the word asset equates only to built infrastructure and economic assets).

6. Development

We make no comment on this section.

7. Combination of the strategies

On the process for identifying and prioritising key assets, see our comments on defining and protecting environmental assets (under Context, above).

On reducing the burden of red tape, while we acknowledge that regulatory efficiency is desirable to an *optimal* point, we urge that it not be sought injudiciously at the expense of the *effective* achievement of the strategy's Vision. Recognising the central importance of regulation to invasive species policy (especially where one is attempting to avert high risk and high impact phenomena) we urge that the word "burden" not be used in the final strategy in relation to regulation. We also urge that the loaded phrase "red tape" not be used, but that instead, the more descriptive term "regulation" be used. The strategy must embrace the fact that strong regulation is a necessary tool and that some regulatory redundancies are at times quite appropriate, especially where voluntary efforts have failed or a precautionary approach is being taken to avert high risks.

8. Principles and best practice

The Integration principle should include the words "*and biodiversity*" to ensure that the integral importance of invasive species management to environmental systems, not just to the more utilitarian "natural resources", is understood.

We urge the inclusion of the precautionary principle here. This principle is required to be considered under the Biosecurity Act 2014.

We note vis-a-vis the Commitment principle that this should include governments taking responsibility for invasive species issues that are a legacy of poor government policy, regulation and program funding.

Re the Commitment principle and references to good neighbour policy, we note that these may to some extent be superseded by the general biosecurity obligation in the new Biosecurity Act. Reference to the new obligation should be made here in the final strategy.

9. Vision and Mission

We propose the changes described below in order to ensure that the vision and mission show more direction, do not place exclusive emphasis on process (cooperative management), and more strongly describe a leadership role for Queensland.

Vision

We propose the following edit to the Vision, in urging that Queensland take a national leadership position on invasive species management:

Weed and pest animal impacts on the environment, the economy and the community **are prevented or reduced to a minimum and** are cooperatively managed.

Mission

We propose the following edit to the Mission, in urging that Queensland take a national leadership position on invasive species management:

To establish and perpetuate effective cooperative management **to prevent or reduce to a minimum** the impacts of Queensland's weeds and pest animals.

10. Desired outcomes, objectives and actions

The wording of the outcomes and objectives could be improved. For example, "roles and responsibilities" is not an outcome (though it could be used as the title of a category of outcomes). Similarly, "prevention", in and of itself, is not an outcome. Prevention of what, in what context, to what degree, and by when? As they stand, the outcomes and objectives provide little clarity or direction and are quite unhelpful from a strategic point of view.

We urge that the set of outcomes and objectives be rewritten to ensure they are SMART (Specific, Measurable, Achievable, Relevant to strategy and Time-bound) as is best practice in such a document.

The more detailed sets of actions also need significant review to ensure proper relevance and utility in a strategic document, to remove repetition and to ensure that each action is properly categorised and grouped accordingly in a logical sequence using sub-headings within each list of actions. We offer the following examples from the draft:

Outcome 1, Actions 4 & 9 appear to be repetitive in addressing keeping of potential pests;

Actions 6 and 9 under Outcome 2 both are almost identical.

Actions 5, 11 and 16 in Outcome 1 all deal with communication and awareness but are not grouped.

The above three actions would logically fit under Outcome 3, not Outcome 1 as in the current draft.

Action 8 (on biosecurity responses) under Outcome 4 should logically be under Outcome 1.

Some actions have been transposed from the Queensland Pest Animal Strategy but actually need modification if they are to be appropriate for a coordinated strategy addressing both pests and weeds.

Research actions are weak, and are included under “monitoring and assessment” whereas research is also critical to Prevention, Awareness raising and other categories of objective.

Action 17 in Outcome 1 (on enforcement) is presented as an instruction not an action.

Neither the outcomes nor the Actions are numbered (numbering them would help to order them and would help the reader to understand any logic that may underlie their sequencing).

11. Stakeholder roles and responsibilities

We understand and endorse the concept of shared responsibility and collaboration in biosecurity. We also note that governments have a leading role to play including on private land, in facilitating prompt and adequate attention to biosecurity aligned with overarching State and national policy objectives.

We urge that environmental stakeholders be involved throughout the hierarchy of stakeholder engagement from national to regional level. There has been insufficient involvement of people and organisations with environmental interests and expertise in the development, implementation and governance of biosecurity policy to date. This has resulted in inadequate and tardy attention being paid to environmental biosecurity threats, with resultant impacts both on the environment and on the public purse (when called on to attempt difficult and costly rear-guard actions to protect environmental assets).

On this point, the skewing of biosecurity effort towards agricultural ends due to the structural positioning of biosecurity responsibility within agriculture departments is a key point in stakeholder roles and responsibilities. We therefore urge that a much stronger role in biosecurity decision-making, regulation, and administration be given to the Department of Environment and Heritage Protection, and that that role be explicitly outlined in the final strategy, along with roles for environmental and ecological scientists and community environmental interests.

12. Management arrangements

We understand that a spirit of shared responsibility and collaboration underlies the leading role given here to the stakeholder based advisory committee. If a stakeholder-based committee is to lead implementation of the strategy it is crucial that at least one third of members have interests and/or expertise in environmental biosecurity (to complement those who may have expertise in agricultural or other aspects of biosecurity). This will ensure an adequate mix of skills and knowledge are applied to implementation, and ensure that implementation is not skewed towards agricultural or any particular sectoral interest.

The Terms of reference refer to “industry-specific” actions to be endorsed, but do not refer to public good environmental actions to be endorsed. This should be rectified in the terms of reference and in the final strategy.

The terms of reference refer to the committee’s role in “endorsing” an implementation plan for the strategy but no reference is made in the strategy to a process for or leadership in preparing that implementation plan. This role should be clarified, and it should be ensured that adequate environmental expertise underlies the preparation of the implementation plan.

The insertion of the terms of reference into the strategy draft has been done in such way as to not make it evident whose terms of reference they are. It would help readers if the committee’s title was included in the sub-heading for the ToR.

It is poignant that the final four words of the strategy are “...within existing budget constraints”, given the many recent biosecurity failures arising at least partly from lack of adequate prompt funding. We urge that these words be deleted lest they bring about a defeatist attitude amongst those whose responsibility it is to implement the strategy. Adequate resources MUST be applied to pro-active biosecurity, to avoid the much larger costs of the alternative rear-guard actions (see diagram, page 10 of the strategy).

Innovative funding approaches and cost sharing arrangements should be applied in bringing about adequate funding for environmental biosecurity. Funding arrangements must be such that adequate funding can be applied immediately for emergency responses prevention and early intervention activities. Funding should be available promptly as required without debate, equivocation or delays around funding sources. Provision for pre-arranged, adequate and prompt funding will help to

ensure that the challenges of weeds and pest animals can be swiftly and effectively addressed. An action along the following lines should be included in the final strategy (splitting the seventh dot point in the draft's prevention and early intervention section):

“Contribute to the development of national weed and pest animal response plans.

Ensure that weed and pest animal response plans and other relevant documents reflect pre-determination of adequate funding and cost-sharing arrangements to enable immediate and effective prevention, early intervention and other action on pest and weed incursions.”

Cost sharing and funding sources should reflect a shared responsibility for and collaborative approach to pest and weed management but must not falter where agreement cannot be reached around funding responsibility for a given incident. Pre-determined arrangements for provision of sufficient funding capacity are therefore imperative.

13. Appendices

We do not have the capacity to make detailed comments on the Appendices but offer the following observations.

Appendix 1 on pest animals - Appendix 1 on pest animals appears to be an ad hoc listing on pest animals with operational aims and required actions for each. This content tends also to be too detailed for a strategic plan. Appendix 2 on weeds is more logically structured in line with the Figure on p12. Appendix 1 needs to be restructured similarly to Appendix 2.

Appendix 2 on weeds – Although this Appendix is logically structured, it does introduce “outcomes” (first column) that are not specifically the Outcomes of the strategy. This needs reconsidered to avoid any confusion in the interpretation of the strategy document, especially amongst those responsible for implementing it.

Matters not covered in the draft strategy

National leadership role

Queensland should be providing a greater leadership role in national policy on biosecurity and invasive species. National biosecurity policy is dependent on a cooperative approach with other governments, largely guided by the Intergovernmental Agreement on Biosecurity. Queensland should exert more influence to achieve much needed reforms, for example by accepting the recommendations to the 2015 Senate Inquiry into environmental biosecurity, supporting the proposal to establish Environment Health Australia, improving the National Environmental Biosecurity Response Agreement, improving transparency and involvement of the environmental sector in biosecurity decision-making, and closing off pathways for high risk environmental invasive species. Leadership in these areas would not only benefit Queensland but all of Australia.

Foresighting capacity

When managing pests, prevention is far better than cure, and early intervention is far more cost effective than managing pests that have become abundant. Prevention is the Government's emphasis under the draft strategy, but there are insufficient actions described in this area. To anticipate new and emerging pest problems, Queensland should develop a foresighting capacity. A foresighting unit staffed jointly by the departments of Agriculture and fisheries and of Environment and Heritage could monitor new trends in aquaculture and animal husbandry and newly established pests in other states. Examples of what could be monitored include: online pet stores; hunting magazines that discuss new hunting opportunities; the goat industry; interstate pest incursions and establishments such as that of the smooth newt; the aquarium industry; changing public expectations about animal welfare; climate change and its impacts on pests and production.

Foresighting could also help to identify and highlight emerging pests such as deer species that may not yet be present in Queensland or may be present in small areas but whose control is inadequate to avert tipping points where their range and populations may expand to become deeply problematic (as deer have now become in NSW – see the recent Natural Resources Commission recommendations for NSW).

The 2009 Hawke review of the EPBC Act identified the need to focus on future threats. The review recommended the establishment of a federal foresighting unit to identify potential and future threats and devise preventative strategies to address this gap at the national level.

Risk-based decision making processes

We emphasise the importance of better outlining the processes by which decisions will be made as to which pest and weed issues will be tackled at any given time. This process must be clear and transparently open to public scrutiny and input. The setting of priorities is a critical part of biosecurity and if done well can greatly improve the chances of success in prevention, eradication, containment and management of pests and weeds. The final strategy should outline these processes clearly and provide adequate direction to ensure effective prioritisation in its implementation.

The importance of a permitted list approach

We note that the Biosecurity Act 2014 (Qld) does not provide for a "permitted list" approach to invasive species. However, the most practicable way to prevent most new weed and pest problems is to assess the specific risk of taxa proposed for introduction into new areas, and permit the sale and movement only of those that present a low risk.¹ This approach already operates for proposed new

¹ Csurhes S, Randall R, Goninon C, Beilby A, Johnson S and Weiss J (2006). "Turn the Tap Off before You Mop up the Spill": Exploring a Permitted-List Approach to Regulations over the Sale and Interstate Movement of Potentially Invasive Plants in the States and Territories of Australia. Proceedings of the 15th Australian Weeds Conference. C Preston, JH Watts and ND Crossman, Weed Management Society of South Australia Inc, Adelaide: 95-98; Invasive Species Council (2009). *Stopping Weed Invasions: A 'White List' Approach*

introductions to Australia (from overseas) and to Western Australia. It involves establishing a permitted (or a “safe”) list of taxa and prohibiting or requiring risk assessment of taxa (species, subspecies and variants) not on that list. A complementary prohibited list then can identify taxa that do not pass the risk assessment or that are already declared and prohibited.

All proposed introductions of taxa not indigenous to Queensland should be assessed for invasive risk. This includes taxa native to Australia but proposed for translocation outside their natural range. Native weeds for example can be just as invasive as exotic weeds. Assessment should also apply to new varieties of existing introductions that could increase the invasive risk.

A permitted list approach is the most feasible way to implementing prevention actions under the strategy. We therefore urge that an action be included in the final strategy as follows:

“Develop a permitted list approach to invasive species management in Queensland, to reflect national best-practice in biosecurity”.

Queensland should work with other governments, particularly NSW, Victoria, NT and the Australian Government, to promote the adoption of a permitted list approach across all states, with consistent mechanisms. This would provide clarity for industry and stakeholders, and increase efficiency (allowing states to share resources). Promotion of a consistent national approach on this should not delay Queensland’s development and implementation of a permitted list approach.²

Branding of the strategy document

It is appreciated that it is customary for Departmental documents like the draft strategy to carry the name of the department and the state logo on the front cover as well as copyright information on the inside of the front cover. This perhaps doesn’t reflect the consultative approach adopted in developing the strategy and so weakens the prospects of the strategy being received as the intended collaborative tool for acquitting a shared responsibility in pest management. Thought should be given to ways of highlighting the broad suite of stakeholders that collaborated in developing this strategy (ultimately for Government consideration and approval). Perhaps a list of organisations and people that contributed could be listed on page 3 with their agreement. This would better reflect a collaborative approach to biosecurity.

Conclusion

We thank you for the opportunity to comment on the draft strategy. We urge that a greater emphasis be placed on environmental biosecurity in the final strategy. We also hope to see more specific and measurable actions and much firmer direction in terms of the resources required to

² For more details about a permitted list approach, see Invasive Species Council (2009). *Stopping Weed Invasions: A 'White List' Approach*. (http://invasives.org.au/files/2014/02/fs_weedwhitelist.pdf)

ensure that stakeholders can adequately acquit their various roles to fulfil the strategy's Vision (including to prevent and reduce to a minimum the impacts of invasive species on Queensland's environment).

In closing we draw your attention to ISC's submission to the Biosecurity Capability Review, which contains further information of relevance to the strategy. That submission can be found at <http://invasives.org.au/publications/submission-to-queensland-biosecurity-capability-review-aug-2015/>