

SUBMISSION

Draft National Incursion Prevention and Response Strategy for Potentially Invasive Animals 2017-2022

Submission by the Invasive Species Council

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About the Invasive Species Council

The Invasive Species Council was formed in 2002 to advocate for stronger laws, policies and programs to keep Australian biodiversity safe from weeds, feral animals, exotic pathogens and other invaders. We are a not-for-profit charitable organisation with over 2000 supporters. Our work is funded almost entirely by donations from supporters and philanthropic organisations.

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Introduction

The Invasive Species Council (ISC) welcomes the opportunity to comment on the consultation draft of the National Incursion Prevention and Response Strategy for Potentially Invasive Animals 2017-2022.

The ISC is a national community-based organisation that seeks to reduce the environmental impact of invasive pests, weeds, diseases and other invaders. To this end our submission aims to help align the draft strategy with our understanding of best practice environmental biosecurity. We urge that you draw on our guide to best practice environmental biosecurity (attached) in framing the final strategy. The guide integrates many policy concepts and ideas to provide a comprehensive road-map for building leading-edge biosecurity systems. The guide can be found at <https://invasives.org.au/publications/biosecurity-best-practice/>.

Our overall impression of the strategy is that while it sets some sound direction, there is a lack of detailed actions, and a pressing need to expand the strategy into a fully resourced program to prepare for and to tackle high-risk invasive animals.

More detailed actions and proper funding is needed to implement the strategy as a full program throughout its life. Initial funding of an implementation program should be announced on publication of the final strategy.

General comments

We strongly support the focus on prevention, early detection and eradication in the draft strategy.

We do urge however that the reference to prevention and early detection as an “alternative” to long-term control of established species (page 5) be re-worded. All stages of the invasion curve require appropriate and adequate responses. Although the greatest emphasis should be placed on the early stages of invasion where greater outcomes can be achieved with a given amount of resources (e.g. prevention and rapid incursion response), it is also important to continue striving for ways to effectively reduce the impact of existing invasive species on the environment.

We strongly support the intention of developing a system that is based on risk and risk-based prioritisation of threats and responses. We urge that where risks to the natural environment are thought to exist, risk assessments must take a precautionary approach to ensure that a lack of full scientific knowledge does not prevent or delay measures to protect biological diversity or other environmental values. We note here that the precautionary principle is included in the Commonwealth Environment Protection and Biodiversity Conservation Act, the Queensland Biosecurity Act, and the United Nations Convention on Biological Diversity to which Australia is a party.

On this note, we applaud the explicit inclusion of principles in the strategy, and urge that the precautionary principle be included in the final strategy vis-a-vis management of risks to the natural

environment. A fuller set of appropriate principles, several of which are already reflected on page 15 of the strategy, is provided in our guide to best practice environmental biosecurity.

We strongly urge that the aim of creating an “implementable” incursion framework (p. 5) be backed in the final strategy with a specific objective and action of securing adequate resources to initiate and to provide on-going resourcing for implementation of the full strategy, and with an initial funding announcement to accompany the publication of the final strategy.

We support the intention of encouraging collaboration, coordination and partnerships towards strong incursion responses. We agree that the threats from animals, particularly those outside the agricultural industry, are not well catered for under existing institutional arrangements (noted on page 16 of the draft strategy). We urge that the final strategy include as an action the establishment of Environment Health Australia or a similar collaborative body, as outlined in our [attached proposal](#), to provide adequate preparedness, coordination, and engagement of the environment and community sectors in environmental biosecurity including in regards to invasive animals that pose a risk to the natural environment.

We applaud the intention to maximise public benefit from public investment and note the importance of a strong focus on environmental biosecurity in this regard (this was also noted in the recent draft report of the review of the Intergovernmental Agreement of Biosecurity).

We urge that the final strategy scrupulously avoid any explicit or tacit suggestion that measures to protect the natural environment from invasive animal incursions must be dependent on quantitative or financial assessment of benefits. For example, the tacit reference to cost-benefit analysis in principle 8 of the strategy on page 15 (“... net public benefit...”) could pose a barrier to timely and effective incursion response given the lack of agreed methods of calculating environmental benefits in quantitative and/or financial terms. In this particular instance, the word “net” should be deleted to remove the tacit suggestion that (environmental) benefits can be readily determined through quantitative analysis. Similarly in principle 10, the suggestion that incursion management must be cost effective, if taken to refer to financial costs and benefits, risks a barrier to timely responses should people interpret it as meaning that environmental benefits must be quantified financially. In this instance, the word effectiveness should stand alone and the word “cost” is best deleted (albeit that in certain non-environmental circumstances effectiveness will and should be interpreted to include calculation of nominal financial costs and benefits). Please see pp. 39-40 of our attached submission to the review of the National Environmental Biosecurity Response Agreement for further discussion of cost-benefit analysis as it pertains to environmental biosecurity.

We note that the scope of the strategy excludes marine fish (p. 14), and we suggest that careful consideration be given to ensuring that a policy gap does not exist regarding marine aquarium fish. If such a gap does exist, we urge that the matter of marine aquarium fish be addressed in the final strategy.

We note that the text of the strategy under Objective 1.1 “Develop efficient NIPR program” takes a somewhat “rose-coloured” view of both response arrangements under NEBRA and of incursion management outside of NEBRA. Our attached submission to the review of NEBRA outlines our understanding of the gaps and weaknesses under that agreement. These include that triggers for action and funding in NEBRA render action unlikely for environmentally invasive species due to the generally poor information-base about environmental values threats and impacts, and high levels of

uncertainty. State responses where NEBRA is not triggered have tended to be inconsistent and *ad hoc*, and “transition to management” has tended to mean in practice that an incursion is left to grow and spread with minimal containment effort. We urge that the points we make in our attached NEBRA submission be taken into account in preparing the final strategy.

We are however pleased to see acknowledgement of the gap in incursion management that exists regarding animals, particularly those outside the agricultural industry (page 16). In this regard we again commend to you our attached proposal to establish a new collaborative body, Environment Health Australia, to develop Australia’s preparedness for environmentally invasive species and to coordinate effort and engage the environment and community sectors towards that end. We urge that the final strategy include an action to establish Environment Health Australia or similar independent collaborative body focussed on preparedness and coordination in environmental biosecurity, to complement the existing bodies Plant Health Australia and Animal Health Australia.

We welcome the intention to regularly review progress towards milestones and objectives under the strategy and its implementation plan. We urge that all reviews be not only reported to the NBC and its sub-committees, but be published on the internet in order to contribute to improved transparency in Australia’s biosecurity system.

Conclusion

The draft strategy is developing in the right direction, with an intention to base decisions on science and risk, to encompass all taxa, and to increase capacity and cooperation to provide strong incursion prevention and response.

We would prefer to see greater specific discussion of environmental biosecurity, and specific objectives and more actions to enhance environmental biosecurity in the final strategy. Indeed, we would prefer to see more detail overall about actions in the final strategy, rather than leaving the bulk of implementation to be detailed in an implementation plan. There is a great need for a specific, prioritised work program to prepare for and act on high risk invasive animals.

We note the many references to the need for further resources in order to carry out aspects of the strategy. We urge that a specific action be included in the final strategy to secure adequate resources to initiate and to provide on-going resourcing for programs that implement the full strategy. Initial and substantive funding for the strategy’s commencement should be announced on the release of the final strategy.

Should you wish to discuss this submission or seek further advice about ISC’s views please contact our CEO Andrew Cox on andrewcox@invasives.org.au.

Thank you for the opportunity to make this submission.



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