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# **Reducing Pest Animal Impacts in New South Wales Regions**

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**Submission to 11 draft NSW Regional Strategic Pest  
Animal Management Plans 2018–23**

April 2018

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## The submitters

This is a joint submission by the Invasive Species Council and the Nature Conservation Council of NSW.

The **Invasive Species Council** is a national conservation organisation that seeks better laws and policies to protect the Australian environment from weeds, feral animals and other invasive species with a focus on prevention and early action. Email [isc@invasives.org.au](mailto:isc@invasives.org.au).

The **Nature Conservation Council of NSW** is the peak environment organisation for New South Wales, representing 150 member societies across the state. Together we are committed to protecting and conserving the wildlife, landscapes and natural resources of NSW. Email [ncc@nature.org.au](mailto:ncc@nature.org.au).

## The draft regional pest animal plans

This submission applies to each of the draft strategic pest plans for the following eleven regions that were on public exhibition for six weeks until 20 April 2018.

- Central Tablelands
- North West
- Central West
- Northern Tablelands
- Greater Sydney
- Riverina
- Hunter
- South East
- Murray
- Western
- North Coast

## 1. General comments

Pest animals are causing major environmental harm in NSW. Their impacts are worsening as new invasive animals arrive and establish, and as established species spread and prey on or compete with native plants and animals, degrade landscapes and waterways, and compromise ecological processes.

The Nature Conservation Council of NSW (NCC) and the Invasive Species Council (ISC) support strong action to protect the natural environment from invasive species. Regional pest plans provide a great opportunity to make a real difference – to prevent new pest species establishing, to stop the spread of harmful species, and to refocus effort on protecting the highest priority species and ecological communities from harm. The plans are also important for limiting damage to agricultural enterprises and safeguarding human health and amenity.

With this submission, we aim to provide constructive recommendations that will help achieve success in invasive species management in NSW over the next five years and beyond. In addition to recommendations for improving the draft regional plans, we make several recommendations that instead require action by the state government. They are important for achieving the regional plans' objectives.

We believe much more work is needed on the draft regional plans. In their current form the plans do not meet the NSW government's objective (as articulated by the Minister for Primary Industries in the government's response to the pest animal review by the Natural Resources Commission):

Regional pest animal management plans, strategies and best practice guidelines will clearly establish expectations with respect to pest management and the actions that should be undertaken to reduce pest animal impacts.

The draft plans do not 'clearly establish expectations' of land managers and other biosecurity participants, for they are written at too high a level and lack guidance on obligations. Nor are they likely to lead to an overall 'reduction of pest animal impacts', for they are mostly bereft of intentions to eradicate or contain pest species and instead rely heavily on the vague concept of 'asset protection'. They defer specific measures to other plans, most of which are to be still written.

## 2. Focus more on eradication and containment

The draft plans focus almost exclusively on 'asset protection' in proposed activities. This is the case even for pest animal populations covering only a small part of a region which could instead be eradicated or contained. For example, although horses and goats occupy only small areas in the Hunter, Murray and Riverina regions, the recommended approach is asset protection. The result will be a lost opportunity to constrain the spread of harmful species, and greater damage in the future.

The Northern Tablelands draft plan is a welcome contrast that proposes eradicating feral horses, containing goat populations, and containing deer (the latter to protect conservation lands). This plan could be strengthened by recommending eradication of small isolated goat populations.

Obvious eradication targets would be camels and donkeys in the Western region; small populations of feral horses in most regions; red-eared sliders in the Sydney region; peafowl, guinea fowl and mannikins in the Hunter; peafowl in the Central West; and small populations of deer in several regions (such as is proposed for chital and red deer in the Western region).

Where eradication is not feasible, containment should be considered for any pests occupying only part of a region, if control methods allow. Research may improve the feasibility of containment (or

eradication) over time. Even for carp, effective public education and bans on the keeping of carp/koi species could prevent spread into carp-free catchments.

A red-eared slider policy is needed to reduce the risks of further spread, review the prospects of eradication and provide more public information about the threats of the slider.

### 3. Focus more on preventing new incursions

Each draft plan specifies as its first guiding principle that:

Prevention and early intervention to avoid the establishment of new pest animal species is generally more cost-effective than ongoing management of established populations.

Yet, there is insufficient focus in the draft plans on preventing new invasive species.

We support the inclusion of the red-eared slider turtle, red imported fire ant, corn snake, Indian ring-necked parrot, chital deer, hog deer and other species on the list of 'alert' species in certain regional plans. These lists should be expanded to make them more comprehensive of high-risk species for each region.

It would be useful to define 'alert species' in each of the plans. A definition similar to that in the *SA Pest Animal Risk Management Guide* could be used:

Species that are not known to be present in the region and which represent a significant threat. Aims to prevent the species arriving and establishing in the management area.

It is vital to ensure that protocols and funds are in place to enable a rapid response and destruction of individuals or populations when an alert species is reported in each region.

Also needed as an urgent priority are reforms at the state level to reduce the risks of new invasive animal species establishing or the exacerbation of existing problems. This includes measures such as more effective fencing requirements (eg. for farmed goats and deer); greater efforts to combat illegal pet keeping and illegal moving and release of pigs, deer and invasive or aquarium fish; and banning the keeping of high risk exotic pets such as the Indian ring-necked parrot, barbary dove and laughing dove. We recommend this ban be phased in to allow pet owners to keep existing pets, but not to breed or replace them.

### 4. Provide guidance on the general biosecurity duty

The 'general biosecurity duty' has great potential to drive improved biosecurity behaviour. All private and public land managers – whether of local reserves, national parks, state forests, mines, roads, railways, farms or bush blocks – need to work out how to comply with the biosecurity duty, including by playing their part in implementing the regional pest management plans.

Unfortunately, the draft plans provide insufficient guidance to land managers on how to fulfil this duty. The duty needs to be better explained and promoted.

The NCC and ISC are concerned that replacement of pest orders with the general biosecurity duty will cause confusion and reduce management standards unless the obligations of land managers (and other biosecurity participants) are clearly spelt out and promoted.

## 5. Improve management of high priority species

### Wild deer

We endorse the listing of feral deer as a priority pest in all regions in the draft plans. There is an urgent need to remove deer as a game animal in the *Game and Feral Animal Control Act 2002* and to reclassify them as a feral animal (along with the likes of foxes and feral pigs). This will remove unnecessary and onerous rules for land managers (red tape) designed to sustain deer populations. This would not affect recreational hunting, for deer would still be available for hunting.

Currently, the DPI website provides contrary information, reporting on one page that NSW's hunting rules recognise that "deer are a valuable resource to both hunters and landholders and allow sustainable management of established populations" and on another page reporting the suspension of deer hunting regulations in nine local government areas "to improve the management of wild deer, minimise their impact on agriculture, the environment, economy and local communities, and allow more options for control".

The South East and North West regional plans propose to suspend Game Act regulations for all local government areas within their regions. This provision should be extended to all plans to facilitate effective deer management. The rationale for suspending the game provisions just for these two regions is not apparent.

Prioritising the interests of recreational hunters has contributed to NSW's worsening deer problems. The goals of recreational hunting and feral animal control are different. Hunters are often motivated to maintain feral animal populations for future hunting, by leaving young and females. Recreational hunting can make professional control more difficult and expensive by altering the behaviour of targeted animals. In some cases, skilled shooters can contribute to feral animal control when they participate in well-designed control programs and when they exert sufficient sustained pressure over small accessible areas.

### Feral cats

Action to reduce cat impacts on wildlife must be given a high priority. NSW needs a state-wide cat management plan similar to the *Tasmanian Cat Management Plan (2017)*. An assets-based approach is the only feasible option for cat management. The regional plans should prioritise activities to protect the most vulnerable native species. As discussed below, this should include cat control to protect native animals from predation after fire.

Also needed are improvements to the *Companion Animals Act 1998* and *Local Government Act 1993* to require responsible cat ownership and prevent roaming domestic cats.

### Wild dogs

We support activities to maintain the ecological role and genetic integrity of wild dogs/dingos in conservation reserves (former 'Schedule 2' land); management and awareness programs that reduce the threat of roaming domestic dogs to livestock and wildlife; non-lethal strategies to mitigate wild dog attacks on stock; and monitoring the population responses of wild dogs, livestock and threatened fauna in response to control programs.

Aerial baiting should only be considered in areas where there are clear benefits for high priority assets and should not occur within the core areas of national parks and where threatened species could be affected. New approaches to wild dog control are much needed, including to distinguish real from perceived impacts (especially with increased reports of fox predation on lambs) and to safeguard livestock through better fencing, guardian animals and other animal husbandry techniques. The focus

in wild dog workshops and working groups should expand to the control of all feral predators – foxes and cats as well as dogs.

### Wild rabbits

The Companion Animals Act should be reviewed to tighten rabbit ownership laws, and local governments should be supported to promote responsible pet ownership of rabbits and carry out rabbit trapping. Consideration should be given to banning rabbit ownership, as occurs already in Queensland.

We recommend that all regional plans refer to the ‘wild rabbit’ instead of the ‘European rabbit’ (as per the DPI 2018 factsheet). People need to be made aware that escaped domestic rabbits are also a problem, causing damage to infrastructure and native vegetation and drawing predators into urban places.

## 6. Control cats and foxes after fire

There is strong and mounting evidence that native animals are highly vulnerable to cat and fox predation in recently burnt habitats. We recommend that the regional plans recognise the need for intensive control of feral predators to protect threatened species after fire. This will require greater collaboration between fire management and pest management staff across agencies. Guidelines for limiting cat and fox predation risks are needed for hazard reduction burning.

To support management, more research is needed into the interactions of fire, pest animals and native fauna. Planned hazard reduction burns and wildfires such as the recent Holsworthy wildfire in southern Sydney are opportunities to trial post-fire monitoring and feral management control programs.

## 7. Develop meaningful indicators

The regional plans state that key performance indicators (KPIs) are critical components of each plan, as part of a ‘monitoring, evaluation, reporting and improvement’ framework. It is intended to develop state-wide pest animal metrics as indicators, to be implemented by July 2019. Since these metrics are not yet developed it is impossible to assess their validity. We request that environment groups be consulted before they are finalised.

Each plan contains species-specific indicators. However, except for the North Coast regional plan, almost all indicators describe activities rather than outcomes. The indicators include activities such as ‘awareness programs’, ‘education programs’, ‘investigate feasibility’ which are not a measure of effectiveness.

It is vital that indicators are meaningful measures of the effectiveness of activities on reducing invasive animal risks and threats, including the extent and density of each priority pest species and the damage they cause.

## 8. Provide sufficient funding for implementation

A substantial increase in funding – for coordination, education, on-ground management and research – is needed to implement the regional plans. Many regional plans use the ‘activities’ column in the Chapter 5 tables to identify the main activities proposed for each priority species. These activities should be costed and serve as a basis for determining the funding needs of each region. A large

investment in research is needed to develop new or improved techniques to improve pest control, including animal welfare outcomes. This is particularly important for feral cats, deer and foxes.

## 9. Provide a state-wide context

The *NSW Invasive Species Plan 2008–2015* has lapsed. A draft replacement plan has been publicly exhibited twice (in 2015 and 2017) but not finalised. It would have been useful to have finalised this plan prior to exhibition of the draft regional plans so that the state-wide context was clear.

A state-wide deer plan is also being developed. It was due for completion at the end of 2017, but a draft is yet to be publicly exhibited. This plan would have provided useful guidance for the regional plans.

Two fact sheets released in early April 2018, near the end of the comment period on the draft plans (<https://www.dpi.nsw.gov.au/biosecurity/biosecurity-legislation/discussion-papers>). These fact sheets explain the regulations that will replace pest orders and the application of the general biosecurity duty to pest animals. This information should have been made available much earlier, and the public given the opportunity to comment on the new regulations. We understand that neither the State Pest Animal Committee nor the Biosecurity Advisory Committee were consulted about the proposals in these fact sheets.

## 10. Maintain regional pest animal committees

Regional pest animal committees should have an ongoing role in monitoring the implementation of regional pest plans and any local pest plans. There may be emerging issues, and the need to review priorities. The regional committees should report to both the Local Land Services board and the State Pest Animal Committee.

## 11. List of recommendations

1. Increase the ambition of regional plans to eradicate or contain harmful invasive animals in regions where they are not widespread. Targets should include populations of camels (Western region), donkeys (Western region), feral horses (most regions), red-eared sliders (Greater Sydney region), peafowl (Hunter and Central West regions), guineafowl (Hunter region), mannikins (Hunter region) and deer (regions noted in the main text).
2. Develop a red-eared slider policy.
3. Focus more on prevention, including state-wide fencing requirements to prevent escape of farmed animals, strategies to combat illegal pet keeping or release of invasive species and a phased-in ban on high-risk pet species.
4. Expand the alert species lists for each region to make them more comprehensive of high-risk species.
5. Include a definition of 'alert species' in all plans.
6. Provide guidance in each regional plan about what the general biosecurity duty requires of land managers (of various categories) and other biosecurity participants.

7. Reclassify deer species as feral animals under the Game and Feral Animal Control Act.
8. Develop a state-wide cat management plan. Amend the Companion Animals Act and Local Government Act to require responsible cat ownership.
9. Limit aerial baiting of wild dogs to areas where there are clear benefits for high priority assets. Do not permit it in national parks. Commission research into new approaches to safeguard livestock and expand the focus of wild dog workshops and working groups to the control of foxes and cats as well as dogs.
10. Tighten rabbit ownership rules (under the Companion Animals Act). Refer in all plans to the 'wild rabbit' rather than the 'European rabbit'.
11. Include activities in regional plans to reduce the predation risks of feral cats and foxes after fire. Facilitate collaboration between fire and pest managers across agencies. Fund research into the interactions of fire, pest animals and native fauna. Develop guidelines for managing invasive predator risks for hazard reduction burns.
12. Consult stakeholders in the development of state-wide key performance indicators.
13. Ensure that all species-specific KPIs are meaningful measures of performance that relate to the activities.
14. Estimate for each plan how much funding is needed to achieve the specified activities. Provide sufficient funding to achieve the objectives of each regional plan and reduce the impacts of invasive animals across the state.
15. Finalise the NSW Invasive Species Plan and the state deer plan prior to finalising the regional plans, to ensure that regional plans are consistent and will contribute to achieving state objectives.
16. Maintain regional pest animal committees to monitor implementation of the regional plans, respond to emerging issues and periodically review priorities.