



The draft implementation plan
for the National Priority List of Exotic
Environmental Pests, Weeds and Diseases

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. It is a not-for-profit charitable organisation with over 3000 supporters, funded predominantly by donations from supporters and philanthropic organisations.

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Contents

1. Introduction	1
2. Costings and budget	1
3. Data platform	1
4. Invasion pathways	2
5. Risk assessments.....	3
6. Communications, engagement, reporting.....	3
7. Invasive ants	4
8. Responses.....	4
9. Identification of priority species	5

1. Introduction

Overall, we strongly endorse the draft implementation plan for the National Priority List of Exotic Environmental Pests, Weeds and Diseases. The plan is clearly written and well rationalised. The proposed work is essential for reducing the risks of incursions of harmful environmental invaders. However, there are a few important gaps in the plan that we address here.

2. Costings and budget

One weakness of the plan is that it is not costed. There is typically a high correlation between lack of costings and lack of implementation by governments. Therefore, we recommend that the next stage of the planning be to cost all medium and high priority actions and allocate the budget necessary to implement these actions. The proposed actions are fundamental to good biosecurity and should be funded as a matter of course. The equivalent priorities for agriculture and human health have all received major investments, and environmental biosecurity is in a catch-up phase.

The draft implementation plan identifies the Environmental Biosecurity Project Fund as a potential funding source to 'deliver EEPL capability gaps', but says it is a low priority. In the absence of other funding, this action should be given a high priority and the size of the fund increased.

Recommendations

1. Cost all proposed actions, particularly the medium and high priorities.
2. Allocate a budget sufficient to achieve the intended outcomes.
3. If specific implementation funding is not secured, review the priority of the action to use the Environmental Biosecurity Project Fund to address capability gaps and increase the size of the fund.

3. Data platform

The draft plan rightly specifies that 'generating more comprehensive sets of data to inform EEPL risks, structure of work and mitigation opportunities is a priority'. What should also be a priority is to establish a data platform to organise and present such data to enable ongoing updates and to make it publicly accessible.

A national public exotic and invasive species data platform is an essential tool for Australian biosecurity – to optimise use of data, facilitate collaboration with and contributions by non-government experts, and ensure that existing work is not lost or ignored. The draft implementation plan mentions a large dataset developed by ABARES for the prioritisation project. This should be made publicly available on the recommended data platform so that it can contribute to future work and be updated.

We strongly recommend as a high priority action the development and maintenance of a highly functional data platform. Professor Melodie McGeoch, who led the Priorities and Pathways project with the Invasive Species Council, has investigated the desirable features of and options for such a platform and should be consulted. Another action should be to regularly update a database of priority risks as new information about risks becomes available and as new risks are identified.

Recommendations

4. Establish a national exotic and invasive species data platform that:
 - provides comprehensive, up-to-date information to support risk assessments, including information on impacts, pathways and potentially susceptible and sensitive sites
 - is updateable, repeatable, with full references for all information and levels of confidence assigned for all assessments
 - is accessible to all (except for restricted information such as trade-sensitive interception data)
 - is sustainable, with resources allocated for regularly updating the information and quality control.
5. Make all information and data generated by the prioritisation project publicly accessible. Maintain the database by regularly updating it with new information on identified risk species and adding species newly identified as risks.

4. Invasion pathways

As the draft plan acknowledges, there are likely to be many more invasion risks to the natural environment than have been documented. Therefore, in addition to a focus on reducing the invasion risks of known risk species, there should be a strong focus on reducing the risks of high-risk pathways of introduction.

The plan acknowledges the importance of interrupting pathways of introduction, but mainly limits the focus to priority species rather than applying it more explicitly as a strategy to reduce the invasion risks of additional potentially harmful species not identified as priorities. Under prevention, the only relevant action is to incorporate the EEPL species into hitchhiker work. Pathway risk management is not specified as an intended outcome for any of the prevention actions.

We strongly recommend an explicit two-pronged strategy in the preventions category to reduce the risks of both priority species and priority pathways. A pathways focus could be developed as one of the risk mitigation measures mentioned in the 'Assign EEPL into functional categories' action. It is mainly through a pathways focus that the intention to mitigate the risks of other than EEPL species can be achieved.

At present it is extremely difficult for researchers and advocates to gain access to Australian border detection and incursion data. Greater transparency would allow improved understanding of pathway risks by researchers and the public.

Recommendations

6. Apply a two-pronged prevention strategy focused on (a) reducing the introduction risk of identified priority species (the current focus) and (b) reducing the invasion risks of identified priority pathways, that includes the following actions:
 - Identify the high-risk pathways for each priority species category based on known pathways from overseas data and Australian intercepts data.
 - Evaluate the effectiveness of Australian biosecurity measures for high-risk pathways and compare the highest-risk environmental pathways to those of highest risk for agriculture and human health. Identify gaps for where additional environmental pathway-focused effort is needed.
 - Conduct import risk assessments of high-risk pathways and impose import conditions to reduce the risks of unintended introductions via high-risk pathways.

- Regularly update pathway information based on the global literature and Australian interceptions.
7. Make available to researchers, and where possible the public, information about border pest detections and incursions.

5. Risk assessments

We strongly endorse as a high priority the proposals for risk assessments (in the ‘General’ category), including to do environment-specific risk assessments of EEPL species and to ‘Investigate the feasibility of drafting a standardised environmental biosecurity risk assessment method’. We recommend the latter be broadened to (a) initially review the adequacy of existing risk assessments methods as they apply to environmental risks, including the question of whether it would be feasible and beneficial to apply a standard method and then to (b) apply optimal, best practice risk assessment methods for environmental risks.

Because risk assessments are foundational to almost all biosecurity actions, they should be done as a matter of course on any species identified as a potential moderate to high risk in a preliminary or screening assessment – not just on the EEPL species. One priority for risk assessments should be the priority species identified in the Invasive Insects – Risks and Pathways project of the Invasive Species Council and Monash University.

Recommendations

8. Commission an independent review of the adequacy of existing risk assessments methods as they apply to environmental risks and whether it would be feasible and beneficial to apply a standard environmental risk assessment method and design best practice risk assessment methods for environmental risks.
9. Progressively undertake risk assessments on the EEPL species and other species identified as potential moderate to high environmental risks.
10. Undertake risk assessments on insects assessed as ‘of substantial concern’ or ‘of concern’ in the Invasive Insects – Risks and Pathways project.

6. Communications, engagement, reporting

We endorse the proposal for a communications and engagement strategy and agree it should be rated as a ‘high’ priority.

One reason biosecurity receives little attention in the environmental NGO sector is that the system is complex and largely opaque. In contrast to environmental functions under the EPBC Act, there is little publicly available information about biosecurity processes (including those relevant to the implementation plan such as risk assessments, inclusion of species on the Country Action List, and at-border and pre-border quarantine processes), and little information about biosecurity outcomes. A communications and engagement strategy offers a chance to boost the environmental sector’s understanding of and engagement with the biosecurity system by committing to transparency (as much as is feasible and affordable). As part of the communications and engagement strategy, we recommend a focus on raising awareness about how the biosecurity system operates to identify, assess and respond to environmental risks and publication of information about outcomes such as detections and incursions.

While we recognise there may be good reasons to restrict access to some biosecurity data, it should at least be made readily available to researchers. It is strongly in the public interest for researchers to have easy access to data to conduct research that supports biosecurity.

As part of a commitment to engagement and transparency, the implementation plan should specify a regular reporting regime that includes information on the biosecurity status of environmental priority species, measures taken to mitigate risks, and interceptions and incursions.

The Invasive Species Council is willing to contribute to many of the actions within the implementation plan. We support a collaborative approach to managing biosecurity risks and can offer our network, resources and expertise to support successful implementation of the plan. We look forward to talking further with the EBO office to explore how best we can assist. We also support the intention to work with First Nations people to implement the plan. We endorse as a high priority the action to 'Consult with jurisdictions and NGOs to coordinate implementation plan with relevant stakeholder strategic plans'.

Recommendations

11. Commit to increasing transparency of the biosecurity system and raising awareness about its operations and outcomes, particularly as pertains to environmental priorities.
12. Develop a policy for information-sharing that specifies a process for making information accessible to researchers while protecting Australia's interests (to protect trade-sensitive information, for example).
13. Commit to regular reporting on environmental biosecurity priority species, including information on their biosecurity status, measures taken to mitigate risks, and interceptions and incursions.
14. Engage with the Invasive Species Council to identify ways in which we can support implementation.

7. Invasive ants

The invasive ants plan specifies actions highly relevant to the draft implementation plan, but is yet to be comprehensively implemented. One particularly important action (6.5), essential for coordination and motivation, is to establish a 'permanent national body to coordinate national actions on invasive ants'.

Recommendation

15. As a high priority, commit to implementing the elements of the invasive ants plan relevant to this implementation plan.

8. Responses

The action under Responses, 'Ensure legislation provisions are adequate to cover EEPL incursion responses' should be expanded to better enable rapid responses. We recommend that the deeds be revised to enable a fast-track decision-making process for EEPL species, with an intended outcome of 'more timely and efficient emergency responses'. This could be achieved by a pre-approval process for many EEPL species, especially those with a high likelihood of arrival, to avoid the need for a time-consuming national significance assessment and cost-benefit analysis.

Recommendation

16. Provide a fast-track decision-making process in emergency response deeds and agreements for responding to incursions of EEPL species.

9. Identification of priority species

The draft implementation plan acknowledges that the current EEPL list is not comprehensive, saying that it should not be considered 'exhaustive'. But even this overstates what the list represents. The current list should be more clearly represented as a subset of priorities. The gaps in the list are not due only to gaps in information. For example, as the Invasive Insects – Priorities and Pathways project made clear, there are numerous ants, bees and wasps about which enough is known to regard them as high priorities for risk assessment. This is partly acknowledged in the text by the suggestion that the red fire ant and electric ant, the only ants on the EEPL, should be regarded as representing 'the broader category of exotic invasive ants'.

The information about the EEPL on the department website also needs to be reviewed to ensure that it properly represents the purpose and limitations of the EEPL. Three aspects should be changed:

- The website currently says, 'The Priority List identifies exotic pests, weeds and diseases that are not established in Australia and **that pose the highest risk** to our environment, public spaces, heritage and way of life' [bolding added]. The list represents only some species that pose high risks – not all the species with the highest risk. This is an important distinction that should be properly explained to avoid misinterpretation and misuse of the list.
- Under the heading *Why is 'species X' not on the list*, one of the major reasons is lacking: that the risks and likely environmental impacts of most species have not been assessed (the point about the lack of knowledge of species with uncertain taxonomy does not address this point).
- The value of using higher risk species and the priority list to address pathway risks – by reducing the risk of entry of all potentially impacting species, known and unknown, by particular pathways – should be noted.

We endorse the statement that the 'identification of the EEPL species is the beginning of a longer-term process to understand the range of exotic threats to our biodiversity and what is required to mitigate them'. While a pathways focus can do much to reduce the risks of non-EEPL species, it is important to also regularly update the priority list with new information and new priority species – in recognition that the work has just begun, that biosecurity risks change constantly and that priority species identification is important to underpin processes such as emergency responses.

In addition to adding species to the EEPL, species should be removed if further information indicates they are a low priority. We also suggest that there is a process for removing species. In particular, we question whether species that impact exotic species in Australia should be included in the priority list – eg Dutch elm disease, honey bee tracheal mite and diseases of trout (most of the aquatic animal pathogens in the EEPL appear to be diseases of economic rather than environmental concern). Such species should be the focus of an agricultural, horticultural or fisheries plans rather than an environmental plan. While we are not advocating the introduction of the likes of honey bee parasites and trout diseases, they could prove beneficial for the environment given the environmental harm caused by their hosts.

Finally, we strongly recommend that the plan includes actions to undertake more systematic assessments of risks in particular groups where information is lacking. There should be an assessment of information gaps to identify priorities for systematic assessments such as the one conducted for insects by Monash University and the Invasive Species Council. One obvious high priority gap is fungal pathogens. We strongly recommend that the robust, transparent and repeatable assessment process applied in the insects project be applied to other groups. The EICAT method (Environmental Impact Classification of Alien Taxa) we applied is endorsed by the IUCN, which will facilitate data-sharing worldwide and the development of compatible databases.

Recommendations

17. Clearly represent the EEPL as a subset of environmental priorities, and note that there are many additional identified and unidentified risk species.
18. Revise the text on the EEPL website to correctly reflect the purpose and limitations of the EEPL.
19. Regularly update the priorities list with new information and new priority species and remove lower-priority species and those that impact invasive species such as honey bees and trout.
20. Identify groups of organisms that should be a high priority for more systematic assessment of invasion risks. Assess priorities by the robust, transparent, repeatable and inclusive methods used for the Invasive Insects – Priorities and Pathways project.