



Tasmania's draft biosecurity strategy 2022-2027

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, funded predominantly by donations from supporters and philanthropic organisations.

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Introduction

The Invasive Species Council welcomes the opportunity to provide a submission into the draft of Tasmania’s Biosecurity Strategy 2022-2027. The draft strategy is a well developed document, and shows that Tasmania takes biosecurity seriously, and considers all components as important. The superseded Tasmanian Biosecurity Strategy 2013-2017 was also a well developed document.

Due to its geography and climate, Tasmania has inherent natural barriers that are augmented by strong biosecurity conditions and activities that have resulted in less invasive species impacts than most of mainland Australia. Despite this natural advantage, invasive species remain one of the most significant threats causing extinctions and declines of Tasmanian biodiversity, as well as necessitating costly and disruptive eradication programs to protect agriculture and trade. Unfortunately, the number of detections and incursions of potential invasive species in Tasmania are increasing from domestic and international trade.

As states and territories, along with federal governments, shift towards a shared responsibility approach to biosecurity, it is critical that the state’s biosecurity is developed and implemented well. This requires extensive support, planning and education by governments to ensure continued success and strengthening of the biosecurity system into the future. The draft Tasmanian Biosecurity Strategy 2022-2027 appears to be taking this approach – and acknowledges the precautionary position while faced with the steadily increasing biosecurity threat from external sources. It has also been drafted with the uncertainty of the state government’s ongoing economic capacity to perform the whole range of biosecurity functions into the future, and recognises that work will be required to move towards shared responsibility and allow real participation in the biosecurity system by all of Tasmania.

We welcome the progress and commitment to modernising and strengthening Tasmania’s biosecurity system, from the reform of legislation in 2019, to this strategy. The focus on prevention and early eradication of newly detected species will set Tasmania on a path to maintaining its natural advantage, potentially in more ambitious ways such as eradicating established pests, such as feral deer.

Recommendations

1. Elevate the voice of the environment in the strategy, as well as in representation on the Biosecurity Advisory Committee, or establishment of a dedicated scientific advisory group.
2. Establish a formal arrangement between the Minister for Primary Industries and Minister for Environment and Climate Change to have the same powers for environmental biosecurity matters.
3. Consider recognising First Nations people and their perspectives on land management in the strategy, ideally in engagement and partnerships.
4. In implementing the GBD, attention must be paid to ensure proper resourcing, support and education programs.
5. Include participating in the Decade of Biosecurity initiative as a means to advance many of the goals of the strategy.
6. Apply an island eradication approach to eradication of feral animals in the strategy, starting with deer, potentially leading to feral free Tasmania as an ambitious goal the state could aim for by 2050.
7. There should be a requirement to prepare a State of Biosecurity report every 4 years, to report on the progress of Tasmania in achieving the goals set out by the draft strategy once implemented.

The draft Tasmanian Biosecurity Strategy 2022-2027 - how it could be improved

The Invasive Species Council supports the overarching goals and content of the draft Tasmanian Biosecurity Strategy 2022-2027. The mission statement is admirable and with commitment to implementation and support, will greatly strengthen Tasmania's ability to protect and promote its advantageous position and avoid many significant invasive pests and diseases. True partnerships and shared responsibility will be achieved through effective governance and support for the community provided by the Tasmanian Government. While some content has been carried over from the superseded Tasmanian Biosecurity Strategy 2013-2017, this is not necessarily a critique of the new draft, rather it is good to see that common themes, priorities and areas that require attention are brought forward when still relevant or not yet achieved.

It is positive to see the link between the draft strategy and the National Biosecurity Strategy 2022-2032 adopted by all national, state and territory governments. It is important for Tasmania to explicitly acknowledge how it is working towards a more transparent, harmonised and strengthened national system.

The indication that Tasmania is approaching biosecurity with the precautionary principle as a foundational pillar is very positive. This concept is ideally applied all the way to the application and development of policy and programs to achieve the strategy's objectives. It is also good to see prevention addressed under Outcome 8 as the best phase of the invasion curve to commit resources for return on investment.

The draft strategy is one of few state or federal strategies to acknowledge, include and address the Intergovernmental Agreement on Biosecurity and its review in 2017. ISC commends this approach in the draft strategy to clearly link the outcome of the IGAB review to the development and investment of biosecurity activities such as nationally consistent surveillance and diagnostic processes, and transparent data collection and sharing. Outlining the IGAB responsibilities within the strategy is a

good way to align and commit to the outcomes in the Agreement. We would like to see other jurisdictions do the same.

The draft strategy benefits from inclusion of the governance framework it sits in. This framework is outlined clearly but with detail, including intergovernmental agreements, international obligations and response deeds. This greatly helps the strategy demonstrate to all readers how it fits within the legal and policy decision making frameworks. The Invasive Species Council supports the direction and inclusion by Tasmania for the 'very low risk' Appropriate Level of Protection (ALOP) and its foundational importance for the ongoing protection of the state.

With the development of the new and consolidated Tasmanian Biosecurity Act 2019 combining disparate legislation into one overarching law, a strategy becomes even more important to guide and drive the actions required to implement the changes from the legal reform, and support the shift from the previous legal framework to include new concepts such as the General Biosecurity Duty, and emerging risks and challenges. The inclusion of the current and future value of citizen science in general surveillance is good to see, and we would be interested to learn what programs or funding the Tasmanian Government will invest to support these.

Climate change and Tasmania's climate is discussed as a barrier to some pests and diseases, but this area could be enhanced within the strategy in greater detail. We would be interested to understand how changing climatic conditions are being considered when risk assessments or conditions of entry are being set. It can be critical for some significant pests; e.g the Queensland fruit fly, historically, was seen as low risk of establishment in Tasmania due to regular consecutive days of low winter temperatures below its survivable threshold. Unfortunately, with climate change, this natural condition is shifting, and the risk of pests such as Queensland fruit fly from overwintering in Tasmania has become a potential scenario. The same could apply to many environmentally harmful pests, weeds and diseases.

It is positive that Tasmania is communicating and recognising the part that the state plays in the national biosecurity system, and incorporates links with interstate trade and new forms of movement that must be monitored, managed and regulated between jurisdictions as well as international trade.

Elevate environmental biosecurity

The strategy could develop in greater detail both the environmental and marine biosecurity priorities, actions and objectives. The current draft does not explore what these two aspects will look like, or what Tasmania will do to achieve improvements. These are currently only acknowledged in the draft as addressed under the relevant interstate agreements (NEBRA and Marine Pests IGA).

The 2022 State of the Environment Report clearly shows that invasive species are the most significant threat to Australia's biodiversity and the leading cause of extinction. It has also been reflected in other jurisdictions' own State of the Environment reporting (where these have been completed) that invasive plants, predators and herbivores are increasing in abundance and range and are the major threat to most threatened species. The drafting of a new biosecurity strategy is an opportunity to solidify protecting the environment into measurable goals, and provide a roadmap to stronger systems, collaboration, and investment to address the threats.

Simply including the word environment when listing the benefits of biosecurity, or the components of the system, is not enough. Stating that environmental threats are dealt with through the NEBRA (which is merely a national response agreement) is not adequate when the new strategy is presenting such an opportunity to drive more attention and resourcing to this long neglected area.

While the environment is referenced as important, more objectives and meaningful, clarified goals and implementation actions should be articulated. The strategy states that Tasmania takes a cost-benefit approach to allocation of resources, however measuring cost-benefit in biosecurity usually does not include a valuation of environmental value in determining when a response is of benefit. Ensuring that value includes the public good and ecosystem services that support all other industries and production systems is crucial.

The Biosecurity Advisory Committee (BAC) has a critical role to play in developing science based policy and advice for Tasmania. It is good to see it is a statutory committee, preventing it from being abolished through future changes in government or priorities. It will be good to see how the BAC engages more broadly to resolve policy questions facing Tasmania, and recommends the most effective management approaches into the future. Tasmania's legislation requires that representation is balanced across all interests. However the current membership of the committee is skewed towards primary industry - only one member has an environmental background or focus, while half of current members are associated with forestry.

Independent science based advice and decision making is critical to properly preparing and responding to incursions or threats from invasive species. While priority pests and diseases known to affect agriculture are well studied and their implications understood, the same cannot be said of environmental pests and diseases. Often an invasive species will enter Australia, and its potential impacts remain unknown until observed in the wild. An example is that of the polyphagous shot-hole borer currently under eradication in Western Australia. While its impact on native forests is known to be extensive in Canada, there has been little to no research or investment into understanding what its threat will be to Australian forests if it spreads outside of urban Perth. It is understood that the Tasmanian BAC is primarily a stakeholder committee. Ideally, Tasmania should also establish a scientific advisory committee to complement a balanced BAC, which could supplement any science advice to inform responses.

This scientific advisory committee would advise the Tasmanian Government, and contribute to the NEBRA and National Management Group (NMG) decision making, in regards to Tasmania's contribution and priorities. While the process currently allows for expert advice to be utilised, in practice these decisions are usually made internally by government representatives. Strengthening this by requiring expert contribution for response decisions will greatly enhance the biosecurity system in Tasmania, and lead by example to other jurisdictions.

As a part of the planned review and evaluation of the BAC during 2025, clear and transparent communication of how effective the committee has been is expected. In representing the environment and public interests, as well as protecting the highly valuable agriculture and trade interests that contribute to the Tasmanian economy, the review should consider whether the committee requires more balanced representation of interests.

Finally, maintaining sole administrative responsibility for biosecurity decisions with the state Minister for Primary Industries and Water also compromises the ability of the Minister for Environment and Climate Change to manage the environmental biosecurity concerns. When the Primary Industries agency and Minister take the lead in biosecurity decision making, agricultural priorities dominate. Tasmania should ensure that there is a formal arrangement (e.g. a Memorandum of Understanding) to ensure shared decision making and equal powers in matters of environmental biosecurity. Without such a formal relationship, cooperation, roles and information flow will continue to be dependent on positive personal relations between senior officials and/or ministers, something which often does not occur.

Recommendations:

1. Elevate the voice of the environment in the strategy, as well as in representation on the Biosecurity Advisory Committee, or establish a dedicated scientific advisory group.
2. Establish a formal arrangement between the Minister for Primary Industries and Minister for Environment and Climate Change to have the same powers for environmental biosecurity matters.

Sustainable funding is important to an effective biosecurity system, particularly in the area of environment, where traditional funding mechanisms are often not applicable (e.g., levies, or cost sharing with profiting industries). It is positive to see the focus on prevention and early action on the invasion curve highlighted in the draft strategy and it's well understood that this is the best phase to invest significant resources. While the goals and actions to achieve sustainable funding are sound, there is a lack of detail on how environmental biosecurity will be prioritised and the cost benefit decisions will be made for environmental incursions and eradications when traditional industry focused resourcing and decision making are applied. Further detail on funding response activities that are beneficial to the public good and environment would be valuable here.

Inclusion of First Nations people

Of concern is the absence of any mention of First Nations people in the draft strategy, recognition of traditional land management knowledge and practices, or a commitment to include them in decision making. We recommend at least adding an objective regarding engagement in order to include their perspectives, knowledge and participation in the state's biosecurity. For example, the Victorian government has committed to Aboriginal self-determination, and are considering this as a core objective in the current reform of the state's biosecurity legislation, and its biosecurity statement. Victoria is aiming to develop the legislation and biosecurity policies to recognise Traditional Owner rights and systems of knowledge in Caring for Country. While every state has a different set of relationships, interests and cultural sensitivities, this is a good place to start and a model for all Australian states and territories.

Safeguarding natural habitats and cultural connections to land and waters is a principle that should be enshrined in any new laws, policies or practices developed by Australian governments. These should include the development of relationships and collaboration to incorporate traditional knowledge and culture. It is critical that this is properly articulated with real outcomes and mechanisms to achieve the desired goal, and not as a symbolic gesture. As an example, New Zealand has been reforming their legislation across a range of social and environmental portfolios to properly include Maori co-governance (decolonising) with measurable, practical methods and outcomes. While New Zealand has the legal power established through the treaty of Waitangi, Australian states and territories have the potential to follow this path – particularly in areas such as biosecurity and land management.

Recommendation

3. Consider recognising First Nations people and their perspectives on land management in the strategy, ideally in engagement and partnership.

General Biosecurity Duty

Introduction of the General Biosecurity Duty has been done in other jurisdictions and is articulated in the draft strategy. Other states have experienced challenges arising from the duty, primarily with the

need to properly engage with the public to inform them of their responsibilities, and also to provide education programs and materials to various stakeholders. Without this, the General Biosecurity Duty can be good on paper but poorly implemented and fail to achieve its goals of shared responsibility in biosecurity and lower biosecurity risks.

It is good to see that the Tasmanian government will be working towards clarifying the role that everyone will play in their participation in the General Biosecurity Duty, now written into law as part of the new Tasmanian Biosecurity Act 2019. It is understood that the duty came into effect on 31 March 2021. The Department of Natural Resources and the Environment Tasmania has considerable information published on its website, including legal information and hypothetical examples. How Tasmania intends to continue rolling this out would be highly relevant for inclusion in the draft strategy, as a means to plan, drive and measure success of the initiative. Outcome 9 in the strategy could include the public awareness campaign on the GBD, along with the already comprehensive training and education outcomes.

Execution of state biosecurity plans will hinge upon the relevant stakeholders understanding their roles under the GBD, and provision of this information should be included at a high level in the strategy, for example as part of effective planning for urgent responses.

Recommendation:

4. In implementing the GBD, efforts must be made to ensure proper resourcing, support and education programs for the wider community and stakeholders.

Partnerships and collaboration - Decade of Biosecurity

Biosecurity has traditionally been a domain of government with the Australian Government taking responsibility for people and goods entering the country, and states and territory governments managing pest animals, weeds and pathogens within their borders.

Increasingly, it is recognised that effective biosecurity requires all Australians to take responsibility. In line with the themes articulated by Tasmania in the draft and superseded strategies, industries, businesses and the community can work to support government efforts. Each and every Australian should be regarded as a partner in our biosecurity system and encouraged to assist, which has been touched upon with the General Biosecurity Duty above.

Collaboration and partnership were a strong theme in the Beale 2008 Biosecurity review and was also emphasised in the 2017 IGAB review.¹ This approach has been formally adopted through the updated 2019 Intergovernmental Agreement on Biosecurity and the National Biosecurity Strategy 2022-2032. Industry, businesses, Aboriginal and Torres Strait Islander peoples and community partners have immeasurable skills and resources, and are willing and eager to be more involved.

The Decade of Biosecurity (<https://biosecurity2030.org.au/>) initiative seeks to ensure that by 2030 there is a strong understanding of biosecurity by all Australians and greater involvement in biosecurity surveillance across the country. The goal of the initiative is to actively engage all Australians in building a stronger national biosecurity system. The objectives are:

1. Biosecurity is well understood by the entire Australian community.
2. Broad involvement in general biosecurity surveillance: all communities, sectors and regions.

¹ Craik, Palmer & Sheldrake, 2017, Priorities for Australia's biosecurity system. An Independent review of the capacity of the National Biosecurity System and its underpinning intergovernmental agreement.

3. A strong, connected biosecurity collective that fosters a mission of shared biosecurity responsibility.
4. Major biosecurity participants agree to a set of priorities for sustaining biosecurity investments.
5. Establishment of sustainable investment mechanisms for essential biosecurity with funding contributions from government and non-government sources.

The Decade of Biosecurity has three main 'pillars' - collaboration and partnerships, communication and engagement, and sustainable funding. A 3-year Decade of Biosecurity implementation plan is currently being developed, including consultation to seek the views of interested parties, and will be finalised by the end of 2022.²

The Decade of Biosecurity 2021-2030 initiative is currently supported by all state and territory ministers, federal, state and territory biosecurity agencies and founding partners: the Invasive Species Council, Animal Health Australia, Centre for Invasives Species Solutions, Plant Health Australia, National Farmers' Federation, National Landcare Network, Landcare Australia and NRM Regions Australia.³

The Decade of Biosecurity implemented at the state level can help drive greater awareness and partnerships and foster the spirit of co-design and collaboration.

Recommendation:

5. Include participating in the Decade of Biosecurity initiative as a means to advance many of the goals of the strategy.

State of Biosecurity reporting

A requirement to prepare a State of Biosecurity report every 4 years would be an effective tool for measuring and reporting progress and success, as well as identifying areas for improvement or increased focus. This function could be an ongoing role for the BAC that has been established. Preparing a State of Biosecurity report would enhance the transparency of the system and monitor performance, as well as publish the progress towards the goals of the new strategy. A State of Biosecurity report would also set out detailed information on how biosecurity is managed in Tasmania, and would incorporate the various roles played by government, industry and communities as the state moves forward towards more shared responsibility. Emerging issues can be identified and recommendations made through the report to assist in meeting the long term goals and provide ongoing performance measurement.

Such a report was prepared by the NSW government in 2017, initially by their Biosecurity Advisory Committee, and continues to be undertaken every four years⁴.

Recommendation:

6. There should be a requirement to prepare a State of Biosecurity report every 4 years, to report on the progress of Tasmania in achieving the goals set out by the draft strategy once implemented.

² Biosecurity Collective, Decade of Biosecurity project summary July 2022.

³ Biosecurity Collective, 'Decade of Biosecurity 2021-2030.'

⁴ NSW Department of Primary Industries State of Biosecurity Report 2013-2017

<https://www.dpi.nsw.gov.au/biosecurity/managing-biosecurity/nsw-state-of-biosecurity-report>

Feral deer control, and a feral free Tasmania

Tasmania is Australia's largest Island, and fortunate in having a complete sea border. Due to this geography, and the efforts of the Tasmanian government biosecurity agencies, it is without many of the pests and weeds that have spread throughout the mainland. With a new biosecurity strategy, Tasmania can increase the ambition and gain public support for solving many of Tasmania's seemingly intractable invasive species problems, following many successful case studies internationally.

This inspirational vision for an island free of the many pests and diseases of the mainland can be applied to addressing the growing feral deer problem where there are strong political forces protecting the interests of the hunting lobby. It can also be applied to addressing feral cats where there is reluctance to impose rules on domestic cat owners or to control feral cats, despite the disproportionate impacts these have on Tasmania's native fauna. It also allows other invasive species threats, such as weeds, phytophthora and foxes (which must be kept out of Tasmania) to be put in a stronger biosecurity context - rather than single species threat focus that is less likely to be successful.

Feral deer can be seen as a major biosecurity risk to the state's agricultural sector, community and environment. The draft strategy acknowledges upfront the difference compared with other mainland states and territories, for pest and disease status and the ability for an island to quarantine more effectively. This presents an incredible opportunity to commit to broad scale programs and eradication activities that will be aligned with the goals of protecting Tasmania's unique natural heritage, threatened species, and identity.

Feral deer are a broad threat not only to the environment, but also pose risks to farmers as a vector for serious livestock diseases such as foot and mouth disease and to humans as a vector of toxoplasmosis. Tourism industries would also benefit from removing feral deer from natural places.

Tasmania could set ambitious goals in the new strategy that would place it as a national and international leader, demonstrating how to achieve solutions to problems that the mainland continues to grapple with.

For example, the draft strategy could include the following goals:

- By 2030, Tasmania is an exemplar for a world-class biosecurity system that protects agriculture and the environment.
- By 2025, mandatory statewide cat containment is introduced.
- By 2030, additional biosecurity policies are enacted including tougher border controls and eradication programs for offshore island weeds, cats and rodents.
- By 2032, the range of feral deer is reduced so that they only occupy the traditional deer areas of the Midlands.

Expanding on these goals, Tasmania could look to the New Zealand Predator Free 2050 initiative. Developed in partnership with communities, Maori people, primary and tourism industries, Predator Free 2050 is an ambitious commitment to work towards restoring their country's natural heritage and removing the most significant threat to the ongoing survival of unique biodiversity. Without knowing exactly how the goal will be achieved, this program has been initiated regardless, and has gained widespread and significant support throughout the country. Tasmania's geography as an island with its own unique biodiversity and natural heritage values presents a similar opportunity.

Recommendation:

7. Apply an island eradication approach to eradication of feral animals in the strategy, starting with deer, potentially leading to feral free Tasmania as an ambitious goal the state could aim for by 2050.

The Invasive Species Council thanks the Department of Natural Resources and the Environment Tasmania for the opportunity to provide this submission to the draft Biosecurity Strategy 2022-2027. We would welcome any questions relating to this submission, and look forward to further engagement during the next phase of the strategy development.

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