



# **Victoria's Biosecurity Strategy Consultation Draft**

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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## Executive summary

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*Biosecurity is a matter for the health of the whole of landscape and society to safeguard our precious agriculture, biodiversity, culture and community health and well-being: Invasive Species Council*

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The Invasive Species Council welcomes the development of Victoria's first Biosecurity Strategy. The harm and impact of invasive species and disease is having a significant impact on Victoria's agricultural economy as well as the natural environment and community safety and well-being. There are many flaws in Victoria's current system of managing invasive weeds and pests and hopefully these will start to be addressed through this biosecurity strategy.

The draft biosecurity strategy has been through extensive consultation and the result is a well informed and meaningful document. Biosecurity covers a wide range of areas of interest and timing of actions, and that has been done well. Nevertheless, the Invasive Species Council is concerned that biosecurity protecting the natural environment and biodiversity, while noted in the draft, is lacking in prominence. There are some serious issues around harm that invasive species are having on our precious biodiversity that need addressing. Some examples are the impact of feral horses and deer on biodiversity and their risk of spread of disease to industry, the community and water supply, yet they are not currently considered pests under Victorian legislation. There are important community education and social licence issues that need attention in Victoria before we can make progress with control of these species. We hope this will be addressed and reflected in the final strategy.

The Invasive Species Council supports the notion of shared responsibility and collective action but we stress that this needs government supported leadership and facilitation to empower landowners and community groups as they meet this challenge, primarily with good advice and fostering partnerships. This should aim to result in landscape scale plans and actions for weed and pest control that work across tenures, have integrated approaches to methods and take a multi species approach where feasible and most importantly, the community feels empowered to take action.

While acknowledged in the draft strategy as an important beneficiary of Victoria's biosecurity management, the environment remains a second priority and background to the continued agriculture focus. This should be elevated in the final strategy.

Finally we believe the Biosecurity Reference Group should now include representatives that have conservation, biodiversity and invasive species skills and knowledge to take the Biosecurity Strategy forward and Victoria now needs to develop a Biosecurity Act to take a contemporary approach to biosecurity matters for the State.

## Summary of recommendations:

- 1 Elevate the voice of the environment in the strategy, and increase the focus on the importance of biosecurity principles and measures to the health of Victoria's biodiversity, including the condition of natural areas listed as world and national heritage and reflect this more clearly in the vision.
- 2 Elevate as a priority the need for sustainable and increased resourcing for biosecurity.
- 3 Recognise that many of our threats to biodiversity from invasive species are yet to be formally classified as pests but their impact needs to be addressed.
- 4 Include ambitious goals for invasive species control on Victoria's islands and peninsulas, starting with deer, and expanding to feral cats and weeds as part of a holistic approach to island recovery and preservation.
- 5 Recognise the risk to agriculture that free roaming invasive species such as feral deer, pigs and goats are to disease spread such as FMD and threat to our water supplies through water borne disease such as cryptosporidiosis, and the risk that feral horses are to the horse industry.
- 6 Recognise that there are social licence issues in the community that need to be actively addressed through education in relation to the need to control or eradicate some pests such as cats, feral horses and feral deer.
- 7 Address legislative and policy constraints on achieving effective control of pest animals, such as:
  - a. Feral deer are a major pest in Victoria to biodiversity, agriculture, forestry and community safety yet there is a juxtaposition between the need for control and their status as protected species under the Wildlife Act.
  - b. Move to a "permitted list" approach to weeds, allowing only low risk plants to be sold.
  - c. Feral cats are one of several key drivers for biodiversity loss in Victoria and a declared pest in some areas of public land, however there are limited tools for control due to the current constraints in policy on not permitting 1080 poison to control feral cats.
  - d. Feral horses are not being controlled in State forest and other Crown land due to issues with the Land Act, where they are considered livestock and unable to be legally culled, also having implications for control in State Forest.
- 8 Biosecurity planning and action needs to be addressed by an integrated species and method approach across tenures and at landscape scales that involve and empower communities.
- 9 Support the role of Traditional Owners in biosecurity and their perspectives on land management in the strategy and their engagement in a decision making partnership, but with clear objectives and measurable goals.
- 10 Biosecurity is a shared responsibility and collective effort but it needs leadership and facilitation and power sharing to engage and empower the community. Resources need to go back into regions for community extension to encourage and assist all in the community groups and individuals to take action and be involved in decision making.

- 11 This strategy needs the backing and alignment with legislation: The Biosecurity Strategy should set out a roadmap to new and specific biosecurity legislation for Victoria. The legislative reform should address the need for statutory regional weed and pest animal plans, stronger compliance powers, accountability and actions for control of invasive species on private land and the inclusion of invasive species and biosecurity measures in the statutory development approval process.
- 12 The Biosecurity Reference Group (BRG) should be reviewed to include more representatives that bring skills and knowledge in biodiversity conservation, invasive species and the application of biosecurity principles to biodiversity.

# Introduction

Thank you for the opportunity to provide input into Victoria's draft Biosecurity Strategy. We commend the Victorian Government on developing this strategy and we hope these comments and recommendations will be considered constructive for formulating the final Biosecurity Strategy for Victoria.

It is highly positive to see the directions that are laid out in the draft strategy, including greater involvement from the community and Traditional Owners, and acknowledgment of the environmental impacts that a strong biosecurity system prevents and reduces. Development of a biosecurity strategy is a big step forward for Victoria and it is positive to see the direction towards a more collaborative model.

The Invasive Species Council will continue to take an active interest in the implementation of the strategy.

## Recommendations in detail

### Focus on the environment

Invasive species are having a devastating impact on Victoria's biodiversity and many of our delicate ecosystems. Across Australia 82% of plant and wildlife species listed as threatened under the EPBC Act are impacted by invasive species, with many of these in Victoria<sup>1</sup>. Biosecurity measures and principles are critical to both the health of nature and our precious biodiversity but also to address increasing economic costs of control of weeds and pests which is often implemented too late.

For Victoria's biodiversity and ecosystems to be thriving and healthy, their functioning needs to be unimpeded by invasive weeds, animals and diseases. While the harms caused by plant and animal pests to the natural environment, particularly in parks, are acknowledged in the Biosecurity Strategy, this is overwhelmed by the positioning of biosecurity in relation to threats to the agricultural industries (which of course are critical as well). The Invasive Species Council suggests the Biosecurity Strategy needs to be more balanced with attention to impacts and integrated actions across the whole landscape, natural and modified.

Biosecurity is critical to healthy biodiversity values on public and private land, not just parks, however the biosecurity strategy should highlight icon protected areas where weeds and pest animals are a serious threat to values and control should be the highest priority, particularly after bushfires. These areas include the Budj Bim World Heritage Area and National Heritage listed parks such as the Grampians, Otways Alpine, Snowy River, Mt Buffalo and Baw National Parks. Victoria also has some outstanding opportunities to create sanctuaries largely free of harmful invasive species such as Wilson's Promontory National Park, French Island, Phillip Island and islands of the west and Central Gippsland coast. ISC suggests that the threat of weeds and pest animals to these world and national heritage values should be addressed.

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<sup>1</sup> Kearney et al 2019 - Threat-abatement framework confirms habitat retention and invasive species management are critical to conserve Australia's threatened species. Biological Conservation Volume 277, January 2023

To highlight this, we suggest a slight rewording of the vision that drives the strategy.

*“We look toward a future where our farms are prosperous and our natural environment and biodiversity are in good health, unimpeded by invasive species, supporting the culture and well-being of Victoria’s communities.”*

The 2022 State of the Environment Report clearly shows that invasive species are the number one threat to Australia’s biodiversity and the leading cause of extinction, and this was also reflected in Victoria’s State of the Environment Biodiversity Update 2021 report, that invasive plants, predators and herbivores are increasing in abundance and range and are the major threat to most threatened species. This reform process is an opportunity to solidify protecting the environment into legislation and committing to stronger systems, collaboration, and investment to address this threat in the new Biosecurity Strategy.

It is reassuring to see the inclusion of the environment in the draft strategy, however the scope should be extended to include specific environmental priorities and outcomes, and the voice of the environment in the strategy should be elevated to equal significance as agriculture. The scope should be extended to include additional environmental priorities, primarily the matter of some species native to Victoria that have spread outside their natural range and could have adverse impacts on the environment. This very serious issue of invasive native species is not currently adequately addressed by Victorian policy, regulation and practice and will require significant development and should be considered within the scope of the new strategy and legislation.

As highlighted in the 2017 review of the Intergovernmental Agreement on Biosecurity (IGAB), biosecurity funding is limited and requires new, sustainable mechanisms to move away from ad-hoc reactive funding. Victoria plays a critical role in the national system, and there is a clear need for increased resourcing. An example of how inadequate funding can lead to negative outcomes is that of the Smooth Newt, where an eradication was not undertaken due to resource constraints and downplaying of environmental risks. Victoria has already identified that risk creators should be made to pay for biosecurity services first in the Invasive Plants and Animals Policy Framework. Victoria has endorsed the National Biosecurity Strategy, which includes sustainable funding as one of 6 core objectives. We support the included Action 17 in the draft strategy to explore new sustainable funding models, and recommend that it be a priority for Victoria to elevate as a priority in the implementation of the strategy.

Victoria’s biodiversity and agriculture is being impacted significantly by invasive pest animals that are not listed under the CaLP Act as Established Pest Animals. As examples: Feral horses are devastating alpine peatlands and herb fields in the Alpine National Park yet are not controlled in adjoining State Forests. Feral deer are impacting extensively on the environment and agriculture, forestry and public safety with over 1 million covering nearly 40% of Victoria. Frontier Economics found that if nothing is done to stem the impact of feral deer in Victoria the cost to the economy will be up to \$2.2 Billion over the next 30 years<sup>2</sup>.

This creates both social and public policy confusion and uncertainty for control. The Biosecurity Strategy needs to recognise these risks of non-classified species and put in place an action that evaluates the need to declare these species as established pests under the CaLP Act.

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<sup>2</sup> Counting the doe: an analysis of the economic, social & environmental cost of feral deer in Victoria. Frontier Economics. A report for the Invasive Species Council. 10 June 2022



As part of the ongoing work to reform Victoria's biosecurity legislation into a single Act, ensure this is considered and invasive species including feral horses and deer are included as established pest animals under legislation, and across land tenure.

With increased pressure on the mainland from invasive species, climate change and habitat loss, islands are potential havens for our wildlife and present us with opportunities to eradicate pest animals and weeds completely, allowing regeneration and habitat for threatened species. Additionally, islands usually do not pose the same social and political challenges as eradication and control on the mainland. Victoria has an opportunity to apply a state-wide island pest eradication approach to feral animals in the strategy, starting with deer, and potentially leading to feral free islands as an ambitious goal the state could aim for by 2050. Programs such as fox reduction on Phillip Island, cat control on French Island, and the project to fence off Wilsons Promontory from incursion to control invasives all show what can be achieved. Feral deer have been introduced to islands off the coast of Gippsland, destroying the fragile ecosystems and driving the destruction of the natural environment. Victoria 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.

#### **Recommendations:**

- 1. Elevate the voice of the environment in the strategy, and increase the focus on the importance of biosecurity principles and measures to the health of Victoria's biodiversity, including the condition of natural areas listed as world and national heritage and reflect this more clearly in the vision.**
- 2. Elevate as a priority the need for sustainable and increased resourcing for biosecurity.**
- 3. Recognise that many of our threats to biodiversity from invasive species are yet to be formally classified as pests but their impact needs to be addressed.**
- 4. Include ambitious goals for invasive species control on Victoria's islands and peninsulas, starting with deer, and expanding to feral cats and weeds as part of a holistic approach to island recovery and preservation.**

#### **Management of established feral animals**

Farmers take biosecurity seriously and most have strict biosecurity controls of the entry and leaving of animals and people to and from their properties. This attention to detail is undermined by large cloven hoofed and other large hard hoofed invasive species roaming the landscape unhindered across public and private land and across state borders. 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. There is the risk of disease such as FMD being spread by feral deer, pigs and goats and should an outbreak occur and get into the wild population, the result would be catastrophic for farmers. Deer are abundant in protected water supply catchments around Melbourne and in regional areas and known carriers of the parasite, *Cryptosporidium spp.* These catchments do not have drinking water treatment systems designed to manage *Cryptosporidium*. This parasite can contaminate drinking water reservoirs and cause infection in humans (cryptosporidiosis). Protecting these reservoirs and catchments from contamination is critical to maintaining a safe and relatively inexpensive drinking water supply without the need for

expensive Ultra Violet (UV) treatment<sup>3</sup>. Tourism industries would also benefit from removing feral deer from natural places.

Should exotic horse disease such as Equine Influenza or Hendra Virus enter the wild population this would be almost impossible to control and have catastrophic outcomes for the horse industry.

The risks and impacts of some large hard hoofed animals such as feral deer and horses have been outlined above and the weakness in our biosecurity system in that they are not classified as established pests notwithstanding the risk and impacts. This is due to some in the community having social and emotional attachments to these species and seek their protection from control. In the case of feral horses this relates to emotive attachment to the animal. In the case of feral deer, the wish to see them as an intrinsic part of the environment for hunting and to see the animals as now part of the natural environment. For cats, the inability of cat owners to understand their impact if not contained. This has led to spreading of misinformation and serious conflicts and dangerous and offensive behaviour from some in the community over their control. The Biosecurity Strategy must recognise this and have an action to address the social licence and inconsistencies around these invasive species.

Feral deer occupy a bizarre position in Victoria where the environmental, economic and social impacts are well known and documented, the rapid spread and increase in population is understood and the biosecurity risk is clear, yet they remain a protected species under Victoria's Wildlife Act for game purposes while the government is investing in control. This juxtaposition between the need for control and their status as protected species needs to be addressed as an action in Victoria's Biosecurity Strategy.

Feral cats are one of several key drivers for biodiversity loss in Victoria however the Victorian Government has an existing ban on the use of 1080 to manage feral cat populations. With limited other tools available this is seriously constraining their control and biodiversity will continue to decline. The ban should be lifted to allow the use of baiting (under permit) and the Felixer grooming trap (under permit, for both feral cats and foxes).

Feral horse control in the alpine regions is being undertaken within the Alpine National Park but there is a major limitation to the effectiveness while they aren't being controlled in adjoining state forest and other public land. This is apparently due to horses being considered livestock in the Land Act and not able to be culled. Government departments are thus unable to undertake feral horse control on crown land managed under the Land Act, and this situation spills over into areas managed under the Forest Act (declared State Forest) as underlying land tenures are not always clear. This has created an unwillingness to undertake feral horse control on areas managed under the Forests Act as well, due to the complex landscape of land tenures in the eastern ranges. The result is there is no feral horse control undertaken except in areas managed under the National Parks Act. This impacts significantly on biodiversity values in State forest and unreserved crown land and hinders control in Alpine National Park as horses move in and out from adjoining public land. This situation is untenable and it seems could be resolved easily through minor legislative amendments or GIC orders.

The Biodiversity Strategy is an opportunity to identify and solve legislative barriers to controlling weeds and pests and future proof Victoria's access to critical control technology and methods. Victoria should use the development of this strategy to move towards a "permitted list" approach to the sale of plants. This approach

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<sup>3</sup> DELWP 2020. Victorian Deer Control Strategy. Department of Environment, Land, Water and Planning. Melbourne

would mean that only low risk plants will be allowed for sale, reducing the impact of one of the primary sources of weeds. This could include for example a commitment to research, development and innovation for controls such as 1080 bait alternatives, and traps that are humane but still effective.

Biosecurity is defined as the collective effort to prevent and manage the harms caused by plant and animal pests and diseases. These harms occur across large landscapes of both public and private land. Management and control response needs to be across tenures, use integrated control methods and work across a range of weed and pest species and empower the community to act on good information.

The Biosecurity Strategy should have as an action the development of community based and supported landscape scale plans to address the harms and impacts of invasive species across properties and importantly, the public and private land interface.

#### **Recommendations:**

- 5. Recognise the risk to agriculture that free roaming invasive species such as feral deer, pigs and goats are to disease spread such as FMD, the threat to our water supplies through water borne disease such as cryptosporidiosis and the risk that feral horses are to the horse industry.**
- 6. Recognise that there are social licence issues in the community that need to be actively addressed through actions around education in relation to the need to control or eradicate some pests such as feral cats, feral horses and feral deer.**
- 7. Address legislative and policy constraints on achieving effective control of pest animals, such as:**
  - a. Feral deer are a major pest in Victoria to biodiversity, agriculture, forestry and community safety yet there is a juxtaposition between the need for control and their status as protected species under the Wildlife Act.**
  - b. Move to a “permitted list” approach to weeds, allowing only low risk plants to be sold.**
  - c. Feral cats are one of several key drivers for biodiversity loss in Victoria and a declared pest in some areas of public land, however there are limited tools for control due to the current constraints in policy on not permitting 1080 poison to control feral cats.**
  - d. Feral horses are not being controlled in State forest and other crown land due to issues with the Land Act, where they are considered livestock and unable to be legally culled.**
- 8. Biosecurity planning and action needs to be addressed by an integrated species and method approach across tenures and at landscape scales that involve and empower communities.**

#### **Inclusion of First Nations people**

The alignment of the Biosecurity Strategy with the Victorian Biosecurity Statement in relation to Traditional Owners is supported, viz: “In the context of biosecurity, this means building meaningful relationships and collaborative partnerships that seek to incorporate the knowledge, laws, culture, customs and traditions of Aboriginal people into our biosecurity laws and system.” This will support the good progress made by the Victorian government in committing to Aboriginal self-determination, and considering this as a core objective in the current reform of the state’s biosecurity legislation, and the 2022 Victorian Biosecurity Statement.

However, while the strategy is good on intent it is lacking meaningful and inclusive objectives and measurable goals for the partnership with Traditional Owners. These objectives should be articulated and enabled through the strategy.

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:**

- 9. Support the role of Traditional Owners in biosecurity and their perspectives on land management in the strategy and their engagement in a decision making partnership, but with clear objectives and measurable goals.**

## **Shared responsibility**

There are some great examples of community groups such as Landcare and the Victorian Deer Control Community Network drawing the community together to tackle weeds and pests both on farm and in nature. The success relies on the capacity and interest of these groups to respond as support from government officers in regions and districts has clearly declined over recent years. Shared responsibility and collective effort doesn't mean walking away and leaving it to landowners and community groups. Effective community action on biosecurity needs support through good advice and facilitation to enable landowners and public land managers to work in that tricky space together. The biosecurity strategy should have an action around committing to putting extension officers back into the regions to assist landowners and particularly community groups and networks to develop plans and tackle weeds, pests and diseases.

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 Victorian Biosecurity Strategy 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 Victorians.

True partnerships and shared responsibility will be achieved through effective governance and support for the community provided by the Victorian Government. Many jurisdictions are incorporating the General Biosecurity Duty into their biosecurity legislation and/or strategies.

## Recommendation:

- 10. Biosecurity is a shared responsibility and collective effort but it needs leadership and facilitation and power sharing to engage and empower the community. Resources need to go back into regions for community extension to encourage and assist all in the community groups and individuals to take action and be involved in decision making.**

## Legislative reform

Australia's biosecurity system and legislative framework relies on both the federal and state and territory governments and agencies working together cohesively, and with systems that support the effective protection of our environment, primary industries, and public health. Currently, Victoria is the only jurisdiction that does not have a dedicated Biosecurity Act. While it is good to see progress being made in 2022 to reform the various pieces of legislation into a single Act, there is no clear articulation of the future legislation in the draft Strategy.

Many national legal reforms, institutional improvements and wide ranging strategies have been developed since the current suite of legislation was enacted. (e.g., the updated objectives of the Intergovernmental Agreement on Biosecurity following the 2017 review, a national Biosecurity Strategy 2022-2032 released several months ago, and various jurisdictions have updated and modernised their own biosecurity laws and related frameworks). Therefore greater flexibility and responsiveness are positive outcomes that should result from the reform of Victoria's legislation and the development of this strategy.

It is very important that Victoria continues the work to reform the current legislation into a modern, single Biosecurity Act, bringing the state into alignment with other jurisdictions and the national Act.

The CaLP Act 1994 is the key legislation to address harmful weeds and pests in Victoria, along with biosecurity related parts of the Fisheries Act 1995, and Aboriginal Heritage Act 2006. These should not be overlooked as they represent important issues - primarily the impact by established invasive species preventing First Nations people from utilising their land or effectively managing it in traditional ways. The CaLP Act is now becoming dated and less fit for purpose. Commitment to the development of regional pest and weed plans and to compliance with the CaLP Act is weak.

Victoria needs legislation that is biosecurity focussed in a more contemporary approach as most states and the Australian Government have now done. Other jurisdictions including Tasmania, ACT, and soon South Australia will be incorporating the General Biosecurity Duty into their new biosecurity legislation. This principle is becoming more accepted as a way to enhance collaborative and shared biosecurity culture and responsibility, however to be successful requires specific program support though government funded education and awareness programs. The GBD will also encourage a risk-based approach to management. Any such legal requirements through legislation must ensure that prevention and early action are prioritised. The Biosecurity Strategy should lay out a roadmap to a Biosecurity Act for Victoria that includes these forward thinking principles.

## Recommendation:

- 11. The Biosecurity Strategy needs the backing and alignment with legislation: The Biosecurity Strategy should set out a roadmap to new and specific biosecurity legislation for Victoria. The legislative reform should address the need for statutory regional weed and pest animal plans, stronger compliance powers, accountability and actions for control of invasive species on private land and the inclusion of invasive species and biosecurity measures in the statutory development approval process.**

## Biosecurity Reference Group

The Biosecurity Reference Group is currently heavily weighted to industry representatives. While its current tenure appears to be finished, it appears from the Biosecurity Strategy that it will have a role now in implementation. The Invasive Species Council suggests that the BRG should open up for nominations again and provide places for those with skills and knowledge in biodiversity conservation and invasive species and the application of biosecurity principles to biodiversity. The Invasive Species Council would be pleased to have a place on BRG along with other conservation groups such as the Victorian National Parks Association and Biodiversity Council, among others.

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. As an enhanced model for the Biosecurity Reference Group, this could be expanded to also serve as an independent scientific advisory committee to advise the Minister or delegate on the administration of the new Act, and in particular contribute to risk assessments, provide advice to decision makers on eradication and control, and could generally enhance the ability to understand the implications of environmental invasives before they arrive in Victoria.

## Recommendation:

- 12. The Biosecurity Reference Group (BRG) should be reviewed to include more representatives that bring skills and knowledge in biodiversity conservation, invasive species and the application of biosecurity principles to biodiversity.**

## References

Counting the Doe: An analysis of the economic, social & environmental cost of feral deer in Victoria. Frontier Economics. A report for the Invasive Species Council. 10 June 2022

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