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Established Pests and Diseases Discussion Paper
National Biosecurity Committee Secretariat
Department of Agriculture
GPO Box 858
Canberra ACT 2601

Thank you for inviting comment on the *Discussion Paper: Modernising Australia's approach to managing established pests and diseases of national significance*. Natural Resources South East has contributed to the state-wide response submitted by Primary Industries and Regions South Australia (PIRSA) and the Department of Environment, Water and Natural Resources (DEWNR). We also wanted to briefly submit some direct responses to the Consultation Questions for your consideration.

Natural Resources South East - Responses to the Consultation Questions

1. Are the proposed Policy Principles appropriate and practical?
2. Are the proposed Policy Principles sufficient?

The Policy Principles in the Discussion Paper broadly align with the approaches of the SE NRM Board. We agree with the broad principle that the degree of investment should be based on the private versus public benefit. For example, in controlling emerging pests, greater investment will be appropriate from landholders when the threat is to production (private benefit), whereas Government and NRM Boards may need to invest more in control of pests that threaten significant biodiversity and ecological values (public benefit).

3. Should listing of established pests and diseases of national significance be for a defined period, or open-ended?
4. What form of review should be required to maintain the listing of a pest or disease as an established pest or disease of national significance?
5. What is an appropriate time period for such a review?

The listing of established pests and diseases of national significance should be open-ended with a set date for review. The review of EPDNS plans should use a risk assessment approach and consultation with stakeholders.

Stakeholders need to be involved in both the initial assessment of national significance and in the review process. NRM Boards can facilitate engagement with their networks for the initial assessment and review of national significance, and provide information to be used in risk assessments such as the success of control programs and distribution data.

The time period for review should be 5-7 years. This timeframe will allow for implementation and monitoring of funded control programs, which will inform the review.

6. Are the proposed roles and responsibilities clear, particularly in relation to your role?
7. Are the proposed roles and responsibilities appropriate and practical?

Broadly, the roles and responsibilities described are clear and appropriate.

The Discussion Paper includes under the roles and responsibilities for government, "work with risk creators where possible to assist adoption of risk management measures as part of normal business practices". Consideration also need to be given to where it is not possible, as enforcement may still be required in some circumstances.

8. What are the issues with establishing and maintaining effective collective action?
9. How can the coordinated approach be best implemented across the various stakeholder groups?
10. How do you see yourself (or your interest/industry/organisation) contributing?

NRM Boards provide an effective method for the Government to coordinate action on pests and diseases. The SE NRM Board has established networks with landholders, stakeholders and communities. It has staff working on-the-ground with landholders to control and monitor pests, and engagement activities that aim to educate landholders and communities about pests and diseases.

A key issue with establishing and maintaining effective collective action is gaining consensus on priority issues. The early and ongoing engagement of stakeholders in the determination and review of national significance will improve collective understanding and assist in driving collective action.

A point not touched on in the Discussion Paper is the potential for pest and disease distributions to change with a changing climate. The risk assessment processes used to assess national significance will need to consider projections of potential future distributions of pests. Understanding the changes to distributions and impacts of pests and diseases due to climate change also needs to be a priority for research.

Thank you for the opportunity to comment on the discussion paper and Natural Resources South East looks forward to the opportunity to provide input into further national policy development.

Yours sincerely



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