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20/10/2016

Submission on Australian Pest Animal Strategy 2017 to 2027: consultation draft

Dear Invasive Plants and Animals Committee members,

The Nature Conservation Society of South Australia (NCSSA) welcomes the opportunity to provide a submission on the Australian Pest Animal Strategy 2017 to 2027: consultation draft and appreciates the extension of time to enable us to do this. As South Australia's primary nature conservation advocacy organisation, NCSSA has been a long term advocate for the protection and conservation of native vegetation and biodiversity in South Australia with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities, management of protected areas and remnant native vegetation.

We provide the following responses for consideration by the Committee in finalising the Australian Pest Animal Strategy 2017 to 2027:

1. *The revised strategy set out the roles and responsibilities of all stakeholders in pest animal management and prevention. Are these clear? Why/why not?*

NCSSA consider the roles and responsibilities identified in the strategy are reasonably clear however strongly recommend that the Australian Government provide a greater leadership role in pest animal management and prevention including support for increased coordination of initiatives across jurisdictions. The current wording effectively absolves the Australian Government of any leadership responsibility and instead relies on action by state/territory governments, industry and the community. We also recommend that the title for the section relating to Natural Resources Management Groups is amended to Natural Resources Management Bodies that applies more broadly to organisations responsible for NRM.

2. *Are the goals and priorities of the strategy focused in the necessary areas? Why/why not?*

NCSSA consider the goals and priorities identified in the strategy provide an adequate overview of the areas where sustained effort is required to manage the impact of pest animals. We are concerned that the draft strategy contains no detailed actions or description of outcomes to be achieved through these goals and priorities. Without such information it will not be possible to evaluate what progress the strategy has made towards achieving the stated goals. The 2007 Pest Animal Strategy contained 72 actions that outlined how the goals and objectives would be delivered and associated outcomes. We strongly recommend that the final version of the strategy include specific actions and outcomes in order to provide greater clarity to all stakeholders about the mechanisms for delivering stated goals and priorities.

3. *The strategy is intended to describe how pest animal management fits into Australia's biosecurity system. Is the link between Australia's biosecurity system and pest animal management made clear in the strategy? Why/why not?*

NCSSA consider the link between Australia's biosecurity system and pest animal management is made sufficiently clear in the strategy. The information contained in Figure 2 is useful in showing the context for the strategy and how it aligns with other related strategies and plans. We recommend the information in the Threat Abatement Plan text box is revised to include TAP's for Unmanaged Goats, Cane Toads and exotic rodents on offshore islands that are also currently approved under the *EPBC Act 1999*.

4. *Additional comments.*

As noted in the Final Evaluation Report for the 2007 APAS, even with resources, many of the identified actions are either ongoing or would take significant time to achieve. We strongly advocate that the Strategy adopt the recommendations of the Evaluation Report, particularly the need to identify actions that might be achievable over the next 2, 5 and 10 years in order to prioritise effort accordingly.

We also recommend that the Strategy include information from Appendix A of the Final Evaluation Report (Pages 74-75) that provides a summary of key activities against the Goals and Objectives of the APAS identified from the APAS implementation plan (2008), the APAS mid-term review (2010) and from progress reports completed by the National Coordinator of the APAS.

The strategy fails to mention the impact of climate change on the distribution and abundance of pest animals. There is a substantial amount of published scientific papers and reports that address these matters and, given the 10 year timeframe covered by this strategy, it is imperative that it consider this issue as a high priority in terms of pest animal control and management.

We trust that the comments and recommendations in this submission will be duly considered and of assistance in finalising the Strategy. If you would like to clarify or discuss any of the points raised please contact me on (08) 7127 4633 or via email at nicki.depreu@ncssa.asn.au

Yours sincerely,



Nicki de Preu

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