



Dr John Keniry AM  
Commissioner  
Natural Resources Commission  
GPO Box 5341  
Sydney NSW 2001

Dear Dr Keniry

Thank you for the invitation to comment on *Shared Problem, Shared Solutions*, the Natural Resources Commission's draft report of its state-wide review of pest animal management. I have attached the Department of the Environment's comments.

I note that the Threatened Species Commissioner, Mr Gregory Andrews, responded on 26 May and that Mr Andrews focussed particularly on recommendation 17, concerning improved legislative recognition and management of feral and domestic cats.

The draft report captures well the breadth of issues related to pest animal management in New South Wales, many of which apply more broadly across Australia. I look forward to reading your final report to the Premier.

Should you require clarification or further information please contact Ms Veronica Blazely on



Yours sincerely

A handwritten signature in blue ink that reads "Stephen Oxley".

Stephen Oxley  
First Assistant Secretary  
Wildlife, Heritage and Marine Division  
3 June 2016



**Department of the Environment - comments on *Shared Problem, Shared Solutions*.  
NSW state-wide review of pest animal management**

**2 Recommendation: Provide transparent state level leadership and accountability.**

*The NSW Government should: i. update the NSW Invasive Species Plan 2015-2022 to: c. specify that the Biosecurity Advisory Committee is responsible for deciding when a pest animal transitions from being a new incursion to an established pest animal*

The Department of the Environment agrees that there needs to be an authority clearly charged with making such a decision in NSW. However, it should be noted that, if an incursion is being handled as a national response under for example the Emergency Plant Pest Response Deed (EPPRD), the Emergency Animal Disease Response Agreement (EADRA) or the National Environmental Biosecurity Response Agreement (NEBRA), there is a role for the National Management Group, comprising CEOs of Australian, state and territory governments responsible for agriculture/biosecurity and affected industry organisations, to decide that eradication of a new incursion is no longer feasible.

**3 Recommendation: Provide regional leadership and local delivery of pest management.**

*The NSW Government should: iv. task the regional pest animal management committees with developing regional priorities and targets for widespread terrestrial pest animal management and standardised systems for surveillance and reporting. The regional plans will complement the mandatory measures for pest management to be stipulated in the biosecurity regulations*

It will be important to ensure that the regional priorities and targets for terrestrial pest animal management take into account state and national priorities. There will be instances where a species may not be considered the highest priority in a region but nationally it may be important to ensure there is broad-scale management across all regions. This concept is captured in the text of the chapters and, while not clearly articulated in the draft report, could be included in the mandatory measures stipulated in the regulations.

**5 Recommendation: That the regulation of non-indigenous species is commensurate with the risks that they pose.**

*The NSW Government should: ii. amend the NSW Game and Feral Animal Control Act 2002 to remove non-indigenous game birds that have been assessed by the Invasive Plants and Animals Committee as posing an extreme threat.*

The assignment of species to threat categories by the Invasive Plants and Animals Committee is a rigorous process. None of the species listed under the *NSW Game and Feral Animal Control Act 2002* have a risk assessment endorsed by the Invasive Plants and Animals Committee because either the species has not been assessed or is unable to be assessed due to a lack of data. As such, they have automatically been assigned an extreme threat rating. The Department of the Environment suggests that where a species has not been assessed a formal assessment could be undertaken and endorsement sought from the Invasive Plants and Animals Committee for the rating.

**7 Recommendation: Implement cost effective surveillance for the timely detection of new pest animal incursions.**

*The NSW Government should: i. include active and passive biosecurity surveillance activities in regional pest animal management plans and the Invasive Species Plan 2015-*

2022 including detail on roles and responsibilities at the state, regional and local scales and the surveillance of online and illegal trade in invasive species.

The Department of the Environment agrees with the need for implementing cost effective surveillance for the timely detection of new pest animal incursions.

It is suggested that regional pest animal management plans could be most effective if the roles and responsibilities for active and passive surveillance are treated separately to recognise the ability for passive surveillance to target a broader range of pests.

**10 Recommendation: Expedite action on critical freshwater pest animal issues.**

*The NSW Government should: i. seek to work with other jurisdictions including the Australian Government to finalise the 2006 Ornamental Fish Strategy by focusing resources on assessing the risks of pathways, rather than species;*

The Department of the Environment acknowledges the National Freshwater Fish Expert Group has been under-resourced in undertaking the risk assessments. However, the risk assessment of species under the *Ornamental Fish Strategy* is conducted on a species basis rather than identifying the pathway risk because the main pathway for all of these species is through the aquarium trade. The Department of the Environment does not consider assessing the risks of pathways as the most strategic method of finalising the noxious species lists.

*iii. advocate to the Australian Government and other jurisdictions the use of environmental flows and environmental water to favour native fish and disadvantage freshwater pests.*

The Department of the Environment agrees with this recommendation.

**14 Recommendation: Promote vocational education and training.**

*The NSW Government should: i. encourage the development and implementation of training courses based on the new Vocational Education Training qualifications*

The Invasive Animals CRC developed the Vocational Education and Training Diploma of Conservation and Land Management (specialising in Pest Management) which was closely aligned to the new pest training qualifications. This course was delivered through the University of Canberra but is no longer being offered. However, the material developed for this course will be relevant and applicable and it is recommended that this material is investigated prior to the development of new training courses.

**16 Recommendation: Manage deer as a pest animal.**

*The NSW Government should:*

- i. exclude all species of deer from the NSW Game and Feral Animal Control Act 2002*
- ii. include all species of feral deer in a regulation addressing pest animals under the NSW Biosecurity Act 2015.*

The Department of the Environment agrees with this recommendation. Deer species are recognised as an increasing threat to biodiversity and impediments to effective control should be removed.

## **17 Recommendation: Manage feral cats as a pest animal.**

*The NSW Government should:*

- i. declare feral cats as a pest by including them in the pest animal regulation being prepared for the NSW Biosecurity Act 2015*
- ii. Ensure any mandatory measures are consistent with the model code of practice for the humane control of feral cats*
- iii. prioritise within the NSW Invasive Species Plan 2015-2022 the management of feral cats in areas of high biodiversity value*
- iv. support continued research into the scale, efficiency, cost -effectiveness, sustainability and risk of cat control methods*
- v. align the Draft NSW Invasive Species Plan 2015-2022 with the Federal Feral Cat Threat Abatement Plan*
- vi. amend the NSW Companion Animals Act 1998 to provide for: a. the compulsory desexing of all cats by the age of four months if not exempted; b. requiring all owners of entire cats older than four months to be registered as a breeder; c. requiring all entire cats to be registered annually; d. local governments to declare and enforce cat confinement areas; vi. partner with the RSPCA and other relevant organisations to deliver a targeted education campaign raising the awareness of the risks posed by stray and feral cats and promoting responsible pet ownership.*

The Department of the Environment strongly supports this recommendation. The recommendation aligns with the Australian Government's priorities on abating the threat that feral cats pose to biodiversity.

## **18 Recommendation 18(i): Maintain the outcomes delivered through Schedule 2 lands.**

*The NSW Government should: i. capture Schedule 2 lands in the NSW Biosecurity Act 2015 framework. This should include provisions for the management of wild dogs on the perimeter of national parks where they have negative impacts and allow for dingo conservation inside national parks.*

The Department of the Environment notes there will be challenges in implementing this recommendation, and the text within the chapters does not address how dingo conservation could be undertaken within the context of wild dog control. It will be important that this issue is discussed during the process of transferring obligations currently under Schedule 2 of the *Local Land Services Act 2013* to the *Biosecurity Act 2015* in order to provide an appropriate balance between dingo conservation and wild dog control.

## **19 Recommendation: Prioritise the implementation of biocontrol options for carp.**

*The NSW Government should:*

- i. acknowledge that carp are a significant pest animal and prioritise their removal from freshwater environments*
- ii. appropriately resource research into the clean-up process for the carp CyHV-3 virus (should it be introduced), including implementation issues, cost recovery options and follow-up control*
- iii. appropriately resource carp clean-up and seek shared funding arrangements and transitional arrangements where possible*
- iv. acknowledge that biocontrol viruses have an effective span of control of about 15 years, based on the experience with terrestrial myxoma and RHD and that research capacity in this area should not be diminished.*

The Department of the Environment strongly supports this recommendation and notes that the Australian Government is investing \$15 million in the development of a whole of

government National Carp Control Plan to be managed by a national coordinator with the intention of releasing the CyHV-3 virus by the end of 2018.

**20 Recommendation: Reduce the impact of feral horses.**

*The NSW Government should:*

- i. finalise the work of the technical reference group and respond to its findings*
- ii. remove feral horses in ecologically sensitive areas using best practice management techniques after consideration of the recommendations of the independent technical panel*
- iii. recognise the heritage value of feral horses within its management program and maintain an acceptable population level across the landscape.*

The Department of the Environment notes that there is a wide range of views in the community about the heritage value and management of feral horses in conservation reserves. The Department agrees that the impact of feral horses needs to be reduced by removing them from conservation reserves such as Kosciuszko National Park where they damage the alpine and sub alpine landscapes, and threaten ecological communities and species listed under the *Environment Protection and Biodiversity Conservation Act 1999*.

**24 Recommendation: Maintain access to markets for pest animals.**

*The NSW Government should:*

- i. work with the Australian Government to allow the development of markets, both export and domestic, for pest animals while minimising regulatory impediments.*

The text related to this recommendation is restricted to discussion of feral pigs and deer species. It may be helpful to clarify whether the recommendation is restricted to these species or intended to apply more broadly to other pest species. The Department of the Environment emphasises the need for caution so as to not to create perverse outcomes such as moving pest animals to new, more convenient areas for harvesting, or breeding of pest species.

**General comments:**

**Chapter 1**

Page 14, S1.2: Guiding principles and pest definition.

The report focuses on those pest animals causing the greatest or increasing impact in NSW. In this introductory section it would be useful to recognise the need to continue to manage the threat posed by other species such as feral goats, rodents, cane toads and camels. It would be useful to include reptiles in the 'risk pathways for new and emerging threats'.

**Chapter 3**

Page 32 Table 3.3: Plans for pest animal management in NSW.

Depending on the level of detail desired in the table, it could list *Environment Protection and Biodiversity Conservation Act 1999* threat abatement plans for rabbit, fox, cat, goat, pig, cane toad and NSW threat abatement plans for fox and gambusia.

**Chapter 4**

Page 51: Inconsistencies in pest animal threat assessment.

The Department notes there are some inconsistencies between pest animal threat assessments and NSW legislation.

The example provided of the ferret (*Mustela putorius*) is particularly pertinent. The risk of ferrets to the natural environment was assessed in 2006 for an application to include this species on the list of specimens suitable for live import under the *Environment Protection*

*and Biodiversity Conservation Act 1999*. Ferrets were assessed as not suitable and were not listed because of the potential disease risk; the risk of introducing new genetic material that may increase the potential for the species to establish feral populations; and ferret's pest potential if they were to establish in the natural environment. It is recommended that NSW reconsiders the classification of ferrets when these determinations are transferred to the *Biosecurity Act 2015*.

It is noted that the intent of recommendation 5(ii), recommending removal of non-indigenous game birds listed as an extreme threat by the Invasive Plants and Animals Committee from the *NSW Game and Feral Animal Control Act 2002*, on the grounds that their listing may provide an incentive for deliberate release, may be inconsistent with the intent of recommendation 24(i), recommending the development of markets for pest animals while minimising regulatory impediments, as hunting of non-indigenous game birds and sale of their meat and other products may be considered a 'market' by some stakeholders.

