



SUBMISSION TO THE NSW NATURAL RESOURCES COMMISSION

PEST ANIMAL MANAGEMENT REVIEW

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NSW Farmers' Association Background

The NSW Farmers' Association (the Association) is Australia's largest State farmer organisation representing the interests of its farmer members – ranging from broad acre, Livestock, wool and grain producers, to more specialised producers in the horticulture, dairy, egg, poultry, pork, oyster and goat industries.

Executive Summary.

The NSW Farmers' Association (the Association) is Australia's largest state farming organisation representing the interests of the majority of commercial farm operations throughout the farming community in NSW. Through its commercial, policy and apolitical lobbying activities it provides a powerful and positive link between farmers, the Government and the general public.

The Association welcomes the state-wide review of pest animal management undertaken by the Natural Resources Commission (the Commission) as a consequence of the Memorandum of Understanding (MOU) agreed between the now Liberal/National Government and the Association prior to the 2015 NSW State Election.

It is the view of the Association that whilst effective pest animal management has been achieved in some instances, pest animals are imposing increasingly devastating impacts on agricultural production and the environment in NSW.

The Commission's Draft Report entitled, "*Shared Problem, Shared Solutions: Pest Control Management Review*" sets out comprehensive draft findings and recommendations. The report is generally reflective of the position and recommendations put forward by the Association in its previous submissions to the Commission addressing the state-wide review of NSW pest animal management.¹

It is the Association's position that major efficiencies in regional land management are achievable through a holistic and consolidated approach to the management of pest animals in NSW. Accordingly, the Association particularly welcomes the Commission's identification of the problem of pest animals as a "shared one", with solutions which "demand shared responsibility, investment, action and accountability across all tenures."²

The Association provides the following submissions in response to Commission's invitation for feedback on its draft findings prior to its final report to the NSW Government in June 2016.

¹ *Submission to the NSW Natural Resources Commission: State-wide review of NSW pest animal management*, November 2015.

² *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016*, Natural Resources Commission, 1.

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1. State Planning.

In conjunction with the Commission, the Association recognises the recent actions of the NSW Government in addressing pest animal management, through the *NSW Biosecurity Strategy 2013 - 2021*, the *NSW Biosecurity Act 2015* and most notably, through the draft *Invasive Species Plan 2015-2022*.³ Like the Commission, the Association also supports the establishment of guiding legislative framework which identifies the concept of shared responsibility as paramount.⁴

The Association supports the Commission's **Recommendation 1** for the adoption of core components for State planning.⁵

Like the Commission, the Association advocates a more inclusive management structure which provides for consistency in management obligations across landscapes, regardless of tenures. The Association supports consistent and coordinated plans and processes across NSW Local Land Services (LLS) boards and other state pest control authorities, which are sensitive to the particular pest priorities of each locale and are facilitated by legislation that is enabling of optimal pest management in NSW.

The Association also recognises and supports the important role of upgraded research pertaining to pest controls, including biological controls, and the necessity of making available to landholders up to date data and information.

In facilitating these outcomes, the Association is supportive of maintaining and developing funding to address targeted needs.

Notwithstanding the Association's recognition of the positive steps taken by the Department of Primary Industry (DPI) in addressing pest animal management, the Association also supports the Commission's call for an explanation from the DPI as to why the actions and outcomes of the *Invasive Species Plan 2008-2015* have essentially been extended for another seven years without providing an account of what actions have been taken and objectives achieved under that plan. Accordingly, the Association agrees with the Commission that the draft 2015-2022 plan should be amended so as to clearly identify the priorities, approach, roles and responsibilities that are required for regional and local plans to support state objectives and priorities.⁶

³ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 33.*

⁴ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 33.*

⁵ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 34.*

⁶ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 33.*

The Association supports the Commission's **Recommendation 2 (i)** regarding clarification of the roles and responsibilities of government, including the NSW DPI, LLS and Biosecurity Advisory Committee and the identification of clear objectives and priorities, measurable targets, roles and responsibilities and timeframes. The Association also supports the recommendation of the Commission that an independent body undertakes a mid and end term evaluation of the plan's implementation.⁷

As stated above, the Association is of the view that a consolidated approach to pest animal management is essential. The Association acknowledges the role played by the Pest Animal Council (PAC) in providing advice to the NSW DPI but agrees with the comments made by the Commission as to the limitations acting upon the PAC, particularly with regards to accountability. Accordingly, the Association supports **Recommendation 2 (ii-v)**.⁸

2. Regional Planning and On-Ground Management.

In its submissions to the Commission in November 2015, the Association advocated better alignment and consolidation of government objectives across the various government institutions, agencies and stakeholder groups. The Association strongly believes that pest animal management functions are most appropriately delivered at a local or district level, with planning being provided at a state and regional level.

At the 2015 NSW Farmers Annual Conference, members passed a motion calling for review of the Local Land Services with specific mention of pest animal management.

It has been the experience of NSW Farmers members, as LLS ratepayers, that leadership is lacking both in the context of the LLS and pest animal management in general. The following statement is extracted from our recent submission on the LLS strategic plans,⁹ which is relevant to improving pest animal management in NSW.

...(our membership) has been concerned with the resourcing of LLS to provide the appropriate technical skills to underpin extension services across the state¹⁰. They believe

⁷ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 35, 36.*

⁸ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 36.*

⁹ NSW Farmers Association *Feedback on Local Land Services draft Strategic Plan(s)* November 2015 page 2 available via www.nswfarmers.org.au

¹⁰ NSW Farmers Policy (2015): That the association lobby the State Government for a review of LLS in relation to:

- a. Pest animal management;
- b. Agronomic support of pasture management issues;
- c. Elections and appointments; and
- d. Drought management and stock routes.

*that the LLS should be actively seeking out and sharing innovation with its rate paying farmers. This is critical to supporting its mission 'to be a customer-focused business that enables improved primary production and better management of natural resources.'*¹¹

The Association agrees with the Commission's views regarding the value of regional committees in providing public and private land manager representation to collaborate in setting regional priorities. The Commission notes that, pursuant to the provisions of the *NSW Local Land Services Act 2013*, LLS regional weed committees have recently been established and restates the findings of its 2014 review of weed management, highlighting the benefits of integrating pest and plant animal management. The Association welcomes **Recommendation 3(i-iii)**, which supports submissions made to the Commission in November 2015 in favour of integrating 'pest plant and pest animal management using advisory committees that feed into LLS Boards across NSW, and a state-wide advisory committee'.¹² The Association would however, like the Commission to prove further detail as to how these committee members would be selected and funded and what qualifications committee members would be required to have to carry out these proposed roles.

In submissions made to the Commission in November 2015 the Association recommended the adoption of a landscape approach to pest animal management. Strategy and adaptability are identified by NSW Farmers' members as extremely important in ensuring outcomes that provide the best triple-bottom-line outcome across all of NSW pest animal management frameworks.

The Association supports a management approach that encompasses local ownership, community participation, coordinated action and continual review and adaptation of programs and which allows for pest animal management to be prioritised through consideration of risk, timing, sequencing of actions, control techniques, capacity and resources and in the context of the economic, social, environmental and institutional characteristics of the landscape.¹³

The Association supports the LLS assuming responsibility for guidance around monitoring, evaluation and reporting at a regional level as well as the role of the LLS in encouraging community participation in pest animal management through its involvement in the planning process, providing a sense of shared responsibility and empowering the local community to own the problem of pest management and collaborate across tenures.¹⁴

¹¹ LLS Draft Strategic Plan, p. 10.

¹² *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016*, Natural Resources Commission, 37,38.

¹³ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016*, Natural Resources Commission, 39.

¹⁴ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016*, Natural Resources Commission, 40.

The Association supports the Commission's **Recommendation 3(iv-viii)** to assign regional pest animal management committees responsibility for providing the targets and prioritising pest animal management as well as systems for surveillance and reporting. The Association supports the recommended requirement for LLS to consult with the Biosecurity Advisory Committee prior to seeking endorsement for the Minister of Primary Industries to release regional plans.¹⁵

The Association is also supportive of ensuring that regional pest animal management plans are enforceable across tenures by requiring Minister endorsement of plans and notes the current legislative frameworks to ensure landholder compliance with regional plans, including, as a "last resort", allowing authorised officers to undertake pest control on that property, with the cost for carrying out this work to be charged to the landholder.

Further to the above, the Association has previously advocated that a priority in improving the on-the-ground efforts of pest animal management in NSW should be ensuring that NSW's agricultural extension and advisory services, LLS, are adequately equipped and able to fulfil their role as extension service provider, large scale coordinator and advisory service provider.¹⁶

The Association agrees with the **Recommendation 11 (i,ii)** of the Commission that a network of coordinators be established with one in each LLS region to improve geographic coverage, capacity building, knowledge transfer and motivation, specifically for pest animal management in NSW. The Association also is supportive of LLS pest management coordinators assisting in integrating pest and weed management, which could be transitioned after three years to coordinate community groups in delivering not just pest animal programs but also invertebrate and weed management programs, through working closely with already established community groups and relevant stakeholders.¹⁷

The Association would welcome a more detailed funding proposal from the Commission, which perhaps incorporated current LLS resources and sourced Federal pest animal and plant management funding as well.

3. Timely Coordinated Response to Pest Animal Incursion.

There is currently a significant amount of uncertainty about who is responsible for what pest management activities at a state, regional and local scale. NSW Farmers wants this review to seek that the directives of government agencies (Department of Primary Industries, Local Land Services

¹⁵ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 43.*

¹⁶ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 40, 41.*

¹⁷ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 63.*

and the Office of Environment and Heritage) are effectively aligned and not a source of conflict or confusion. NSW Farmers is advocating for better alignment of government objectives across the various government institutions, agencies and stakeholder groups.

Effective pest animal management does not happen without good coordination. No matter how good each stakeholder, landholder/manager or agency is at carrying out responsibilities independently, all parties need coordinating. Because of this separation, current compliance and enforcement arrangements are not and cannot be effective.

The Association supports the Commission's identification of clear roles and responsibilities being critical to the effective management of incursions and that the *Biosecurity Act 2015* and regulations, whilst being positive in reducing institutional complexity, still leaves room for improvement. In particular, the Association agrees that the roles and responsibilities of the NSW DPI and the NSW Office of environment and Heritage (OEH) should be clearly identified, agreed and formalised. The Association very much supports the Commission's **Recommendation 6(i)**.¹⁸

4. Information Management.

It is the Association's view that the effective management of new incursions depends on the collection and management of information. The Association welcomes steps being taken by the NSW DPI, in particular the Biosecurity Information System, in providing access to information and the timely reporting of data. The Association agrees with the Commission's **Recommendation 8**.¹⁹

In terms of evidence-based programs, NSW Farmers' members would like to see an improvement in the timeliness of the availability of data and information about environmental research and monitoring activities undertaken which would inform management practices. Our members are aware of research occurring which would improve management practice or facilitation of management, however there are significant time lags until this research and information is in the public domain. The Commission has recognised this issue in its recommendation that timely access to resources, including funding for research, information, planning, coordination and eradication or containment is essential in supporting the role of early detection in pest animal management. The Association supports the Commission's **Recommendation 9** for the clarification and formalisation of arrangements for accessing NSW government agency funding for eradicating new incursions.²⁰

¹⁸ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 55.*

¹⁹ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 56.*

²⁰ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 57.*

On this topic, NSW Farmers also supports and pushes for an increase in the research on biological controls and other control measures for pest animals.

5. Manage Deer as Pest Animal.

It has strongly been the position of the Association that deer are a significant pest animal threat and that their pest status should be formalised by the Government.

The Association has received many reports from its members regarding the significant increase in the feral deer population across the state and emphasises the need for more efficient and effective management strategies, which the Association believes can only be facilitated through formal declaration of deer as a pest animal.

If declared a pest, management of deer control would fall within the responsibility of communities and their local landholders, supported and coordinated by LLS. The Association therefore, strongly supports the Commission's **Recommendation 16**, calling for management of deer as a pest animal.²¹

1. Wild Dogs – Schedule 2 Lands.

The economic and social impacts on landholders associated with the predation of wild dogs are of significant concern to the Association.

The Association is supportive of programs, which have the control of wild dog populations as their objective and, accordingly, has supported the management of wild dogs through the Schedule 1 and Schedule 2 lands structure.

The Association is supportive of systems which facilitate the conservation of dingo populations whilst also allowing for management of wild dogs.

The Association is therefore, supportive of the Commission's recommendation that the framework by which schedule 2 lands outcomes were achieved be maintained.²²

²¹ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 76.*

²² *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 84.*

2. Recreational Hunting.

Having regard to the above, the Association also supports the Commission's identification of recreational hunting as a valuable part of a pest management program.

The Association agrees in principle with the Commission's comments regarding the unnecessary and complex regulations involving mandatory licensing for hunters to access private land and the Commission's **Recommendation 23 (i, ii)** to reduce red tape surrounding recreational hunting on private land.²³

Notwithstanding the above, it has been the experience of many NSW Farmers' members that recreational hunters have been responsible for causing significant problems for Farmers, including disturbance of stock, damage to crops, vandalism and arson. We understand that there have also been instances of hunting dogs attacking livestock and stock being shot. The Association recommends that the Commission give further consideration as to how farming communities can be protected from these anti-social behaviours of hunters and how these groups can be managed and controlled.

The Association further submits that it would be also appropriate to extend the application of the proposed regulations pertaining to hunting to management of kangaroos. All Australian States and Territories, including NSW, have legislation to protect kangaroos, however, kangaroo populations have exploded across Australia's rangelands and are now at plague proportions throughout the State. The Association submits that hunting should be further utilised as a means of kangaroo management on farms in Australia and that any review of pest animal management in NSW is incomplete without consideration to the management of kangaroos.

3. Providing Adequate Resources to Deliver Effective Pest Animal Management.

The Association notes the Commission's estimate that current spending on pest management is around \$61 million per year, with \$22 million directly contributed by landholders and an additional \$5 million collected via rates.²⁴

A priority in improving the on-the-ground efforts of pest animal management in NSW will be ensuring that NSW's agricultural extension and advisory services, LLS, are adequately equipped and able to fulfil their role as extension service provider, large scale coordinator and advisory service provider. It

²³ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 97.*

²⁴ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 107.*

remains the policy of NSW Farmers in this and other contexts that LLS should collect rates on all holdings from two hectares upwards, and that all public land managers pay rates to LLS.

We believe that broadening the base of the LLS ratings will significantly improve the true 'shared responsibility' aspect of pest animal management and agree with the Commission that decreasing the LLS minimum rateable size will assist in increasing funding. The Association therefore, expressly supports the Commission's **Recommendation 30(i)**.²⁵

The Commission has recommended that funding in each LLS region be sourced by NSW Government and the establishment of a new Local Land services rate, specifically for pest management coordinators.²⁶

The Commission has also recommended a rapid response fund in each Local Land Services region be funded by a new pest management rate, specifically for strategic activities. The fund would be solely funded from this rate and used by LLS Boards to fund emerging risks and opportunities in pest animal management.²⁷

Whilst the Association is of the view that different avenues for resourcing pest animal management in NSW should be explored, it is the Association's position that there is not sufficient information provided by the Commission's draft report for the Association to state its support for the proposed funding strategy.

The Association requests that the Commission explore in significant detail, the use of current rates, so as to provide further detail as to the quantum of any new rate, how any new funds would be utilised and what accountability mechanisms would operate. The Association is further of the view that the fund should be used not for "facilitation" but for carrying out actual works. It is further the position of the Association that it may be worthwhile to consider Industry lead coordinators rather than appointments from the Government. There is not sufficient information in the Commission's report to justify a new rate.

The Association notes the Commission's recommendation to implement a "special purpose rate" to provide a "rapid response fund", targeted at strategic priorities. It was recommended that the fund would not be ongoing and would be capped at \$300,000.00 per LLS region. Each LLS region would set a maximum cap for the fund and suspend special purpose rates once the cap is reached in any

²⁵ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 112.*

²⁶ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 113.*

²⁷ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 113.*

given year. Any unspent funds from year to year would be rolled over and accounted for separately from other LLS funding.²⁸

It is the view of the Association that the details of the “special purpose rate” proposed by the Commission are not sufficient, such that the Association can support the recommendation. The Association submits that as opposed to requiring regional landholders to pay an additional levy for the “special purpose rate”, consideration should be given to converting the locust fund into a “Special Purpose, rapid response fund”.

Further to the above, we assume that under-resourcing is a significant contributor to the lack of accountability currently being exhibited by Government services in this space and there would need to be more money for Government to have a more proactive role in this space. NSW Farmers remains of the view that efficiency gains found by taking a holistic approach to the legislation mentioned above will go a long way in resourcing the optimal pest animal management scenario.

Conclusion.

It is the Association’s position that major efficiencies in regional land management are achievable through a holistic and consolidated approach to the management of pest animals in NSW.

The Association is generally supportive of the Commission’s Draft Report entitled, “*Shared Problem, Shared Solutions: Pest Control Management Review*” and recognises that it largely reflects the position and recommendations put forward by the Association in its previous submissions to the Commission addressing the state-wide review of NSW pest animal management.

The Association would particularly like further clarification from the Commission regarding the funding systems that it has proposed. It is also of concern to the Association that the management of the State’s kangaroo population is not considered in its review. It remains the Association’s submission that that any review of pest animal management in NSW is incomplete without consideration to the management of kangaroos.

The Association appreciates Commission’s invitation to provide its views and we look forward to the review findings.

²⁸ *Shared Problem, Shared Solutions: Pest Animal Management Review: Draft Report March 2016, Natural Resources Commission, 113,114.*