



SYDNEY COASTAL COUNCILS GROUP INC.
Councils caring for the coastal environment

SUBMISSION

Natural Resources Commission Draft Report – Pest Animal Management Review 2016

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Introduction

Established in 1989, the Sydney Coastal Councils Group (SCCG) is a regional organisation of Councils with twenty-five years' experience in leading sustainable coastal management. The SCCG comprises Member Councils who represent approximately 1.3 million Sydneysiders, and is the peak NSW ROC representing coastal councils.

As land managers, our Member Councils share an interest in the outcomes of the Pest Animal Management Review, and the SCCG is a strong advocate for working collaboratively and transparently to ensure positive environmental, social and economic outcomes are achieved for pest animal management across NSW and in particular Greater Sydney.

We welcome the opportunity to provide a submission in relation to the Draft Report on the Pest Animal Management Review, including both general comments and specific comments based on recommendations provided in the draft report.

General Comments

- Overall the Draft report is comprehensive. SCCG welcomes the inclusion of management recommendations for freshwater vertebrate species in NSW.
- SCCG questions why the terms of reference for the draft report did not include marine pest species.
- SCCG agrees that state-wide strategies and regional plans need to be consistent and align with the Biosecurity Act 2015 and the NSW Invasive Species Plan 2015-2022.
- Section 1.2 – Guiding principles and pest definition. It is suggested that point one of this definition “a pest animal is any animal with the potential to have a negative effect” needs further clarification. If taken as a stand-alone definition, there is no text around exempting native species or companion animals. It is also not clear in terms of the wording around ‘a negative effect’ - on what?, and by whose/what definition?
- SCCG agrees with the six principles for effective pest management (page 15).
- Section 1.3.2 Legislation, plans, governance roles – It is noted that there is no mention of Local Government in this section, and yet Councils as a land manager, particularly in urban areas, do play an active role in pest management, with respect to the management of foxes, rabbits, feral cats and Indian Myna birds.

Local Government is only mentioned briefly throughout the document as a whole. It is recommended that the roles and actions of Local councils, particularly in the urban context, be recognised and that there is an understanding and consistency between what roles/responsibilities are expected of Local councils and what actions councils are actually implementing on-the-ground.

It is noted that LLS will be receiving further staff resourcing and funds through various funding mechanisms, which SCCG recognise as essential in LLS achieving its objectives for pest management. However, some additional funding sources should also be afforded to Local Councils in recognition of the work they undertake on pest

management and the necessary partnerships and collaboration between LLS and Local government to ensure successful outcomes.

- In general, the SCCG is supportive of all of the recommendations provided in the draft report, that have not been specified for comment under the 'Comments on Specific Recommendations' section below.

Comments on Specific Recommendations:

Recommendation 1 – Adoption of core components for state planning:

- SCCG agrees with the core components provided for inclusion in the Invasive Species Plan 2015-2022, in particular, the development of new shared funding initiatives to address targeted needs and prioritisation of ongoing research.
- Whilst improving the control of pests is of utmost importance and streamlined processes are efficient and effective. There needs to be caution applied in reducing so-called 'red tape'.

Recommendation 2 – Provide transparent state level leadership and accountability:

- The SCCG particularly applauds the inclusion of an independent review of the NSW Invasive Species Plan and the recognised need for clear measurable targets.
- SCCG supports recommendation i (a and b) as there is a need to ensure that all roles and responsibilities of agencies are defined and are consistently applied through one lead agency.
- SCCG supports the recommendation that an aquatic biosecurity representative be appointed to sit on the Biosecurity Advisory Committee, with the stipulation that the aquatic biosecurity representative must cover both freshwater and marine ecosystems with respect to pest management and biosecurity.

Recommendation 3 – Provide regional Leadership and local delivery of pest management

- SCCG agrees that regional pest management committees should be established, and be tasked with developing regional priorities, targets and plans. However, this should take into consideration and recognise the regional groups that currently exist and have been undertaking great work in the pest management/feral animal space for well over a decade (for example the Urban Feral Animal Action Group in the Northern Sydney Region).
- It is recommended that the regional pest animal management committees not only focus on terrestrial pest animals but also incorporate freshwater pest animals, and potentially marine pest species into their remit.
- SCCG agrees that the roles, responsibilities and boundaries between local Councils and the Local Land Services in Greater Sydney (urban areas) needs further clarification (viii).

Recommendation 4 – Clarify freshwater roles

- SCCG supports the recommendation that Fisheries compliance and conservation officers should become authorised officers under the NSW Biosecurity Act 2015, and recommends that DPI develops a monitoring and surveillance plan for freshwater pest animal management that is both transparent and accessible to other agencies including local councils.
- There needs to be recognition that DPI and LLS are not the only agencies that should be encouraged to collaborate on freshwater pest management. It is essential that local councils and catchment groups are included in any collaboration and information sharing on managing freshwater pest animal between DPI and LLS, particularly where freshwater pest management issues are located in, for example, rivers/streams/creeks/lakes within specific catchments or Council local government areas, and where community programs, education and capacity building for the local community is required.

Recommendation 10 – Expedite action on critical freshwater pest animal issues

- The SCCG is supportive of government agencies and industries working collaboratively to develop strategies to address freshwater pest animal issues, including a proposed registration / licencing system under the NSW Biosecurity Act 2015.
- Recommendation 10 (iii) – as noted on pages 59-60 managing environmental flows and environmental water to enhance native fish populations and ecosystem health has had mixed results, with pest animals generally more adaptive than native species.

Climate change impacts will only add to the challenges faced. Any changes to environmental flows/environmental water through management actions will have effects on species both native and pests. Question such as how can it be ensured that these actions will favour native fish and disadvantage pest animals without impacting on the freshwater ecosystem as a whole?, require clarification. It is essential that prior to any management actions/use of environmental flows/environmental water that there is a solid scientific basis / evidence that actions taken will work in favour of the native species.

Recommendation 11 – Support and coordinate local on-ground action

- SCCG is supportive of establishing regional pest management coordinators. Recommendation (i) should specify local councils as working closely with the regional pest management coordinator. It should also be specified that these coordinators will link to/play a role in the regional pest management committees (recommendation 3).

Recommendation 12 – Promote shared responsibility for pest management across the community, industry and governance

- The SCCG is supportive of the development and delivery of capacity building and education programs as this aligns with our own goals. This recommendation specifies that LLS and the regional coordinators deliver these education programs. It should be noted that particularly, in an urban context, the local council is generally the first port of call for the local community regarding pest issues and is the closest level of government to the community in terms of education capacity. It is recommended

that local councils be specifically mentioned in recommendation 12 (i) working in collaboration with LLS and regional coordinators (taking into consideration applicable resources/funding made available to local councils for this purpose).

Recommendation 17 – Manage feral cats as a pest animal

- The SCCG supports all recommendations (i – vii), particularly (vi), the amendment of the NSW Companion Animals Act. The recommendations to changes to the companion Animals Act should also include the introduction of a night-time cat curfew.
- (vii) - a number of local councils are already implementing education programs for their community on responsible pet ownership, including cats, so should be included in the partnership with the RSPCA and other organisations to deliver a targeted program.
- It is recommended that the Companion animals Act also be reviewed to incorporate other companion animals such as rabbits, targeting desexing, registration, and heavy penalties for dumping/releasing rabbits.

Recommendation 19 – Prioritise the implementation of biocontrol options for carp

- The SCCG recognises that carp is a pest species that requires prioritisation. Given that clean-up options only has been estimated at 30 million it is essential that sufficient research has been undertaken to determine the best possible and most cost efficient alternatives available for carp removal and clean-up.
- SCCG suggests that a further recommendation (v) be added to the report to ensure it receives formal recognition and weight. This recommendation is for the NSW Government in collaboration with LLS, local councils and local community/catchment groups to develop an education program to alert the community to the use of the virus (CyHV-3), including any potential or perceived risks and health impacts on ornamental species related to carp such as Koi, or potential/perceived threats to other animals or humans.

Recommendation 23 – Reduce red tape surrounding recreational hunting on private land

- The SCCG supports (ii) in promoting membership (and training) of approved hunting organisations to all recreational hunters to ensure that all recreational hunters have adequate training, knowledge and awareness of the best possible hunting techniques for specific pest and game species. Matching hunters to landholders through an assist program is also supported.
- The SCCG does not support recommendation 23 (i). Licences should not be removed to cut procedural red tape for recreational hunting on private land. As it now stands licenced recreational hunters must follow a Code of Practice to ensure ethical, safe and responsible hunting, including being aware of animal welfare issues and abiding by animal welfare standards including humane methods of kill. Removing the requirements for a recreational hunting licence to target non-indigenous species increases the risk of unsafe practices from amateur recreational hunters with little experience, it also seemingly removes any obligation for recreational hunters to take into consideration animal welfare and humane treatment of non-indigenous pest species.

Recommendation 24 (i)- Maintain access to markets for pest animals

- The recommendation of allowing the developments of markets for pest animals is fair, however, regulatory 'impediments' depending on how these are defined should not be minimised, in order to ensure continued food health and safety standards are met, as are animal welfare standards.

Recommendation 30 – Provide adequate resources to deliver effective pest animal management

- Recommendations (i – iv) are supported by SCCG, with the understanding that adequate resourcing will be provided to urban areas to manage urban pest animals.



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