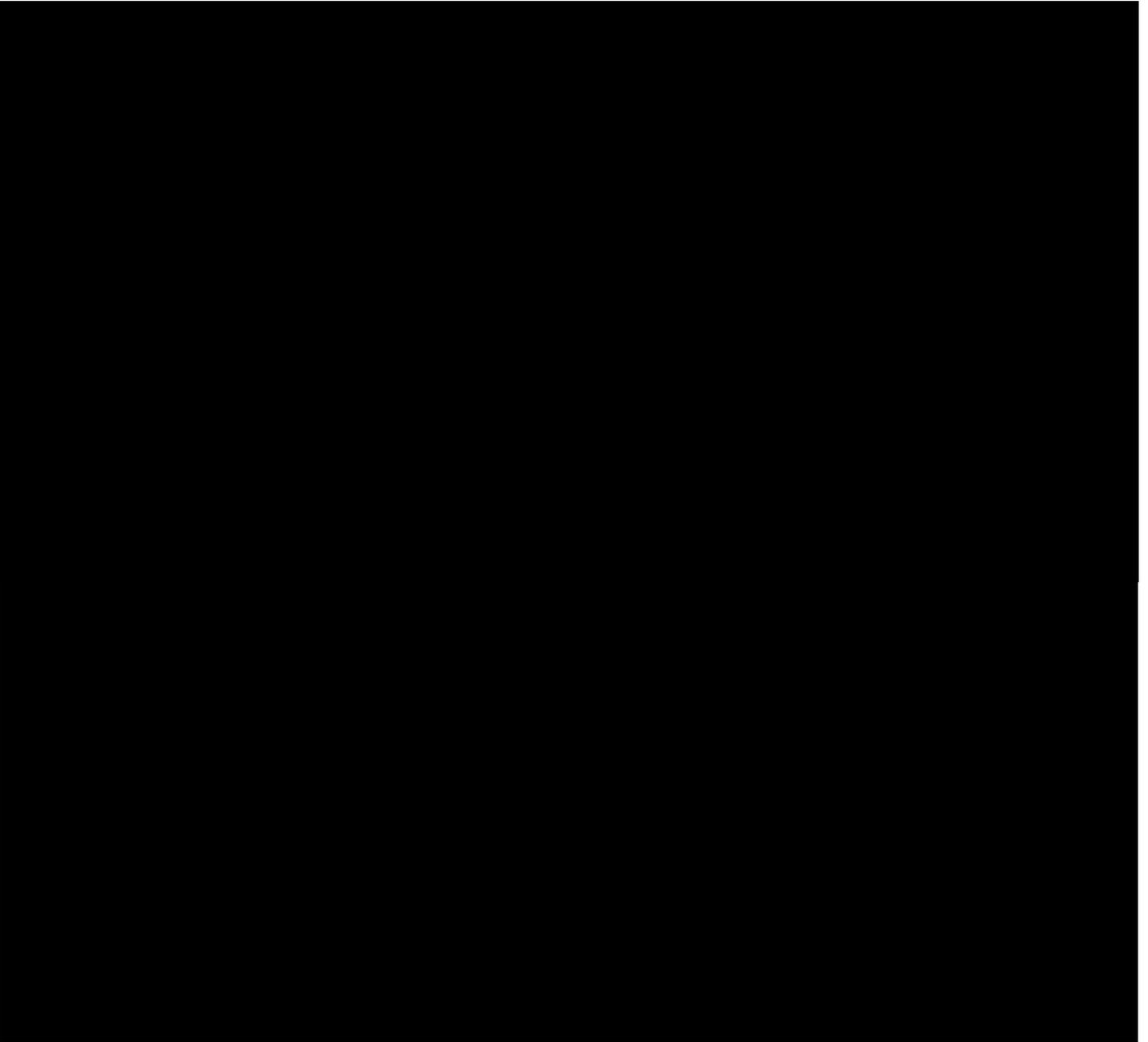




Sent: Monday, 30 November 2015 3:18 PM

To: NRC

Subject: State-wide review of pest animal management submission



BK & CJ Tomalin

Natural Resources Commission
GPO Box 5341
Sydney NSW 2001

Thank you for the opportunity to make a submission into the State-wide review of NSW pest animal management. As a grazier I have been involved in pest management for over 30 years. I have had considerable experience with wild dog management at a number of levels:

- As a grazier and member of a Wild Dog Control Association;
- As a Director on Armidale Rural Lands Protection Board and New England Livestock Health and Pest Authority with a major role in wild dog management policy;
- As a member of the NSW Wild Dog Working Group;
- As a member of NSW Farmers Conservation and Resource Management Committee and dealt with pest issues;
- As a member of Pest Animal Council;
- As a member of numerous steering committees of for Department of Agriculture and National Parks wild dog research projects.

I have not attempted to answer all the questions posed by concentrated on the areas where I have the most experience and expertise.

Yours faithfully
Brian Tomalin

Are roles and responsibilities for pest animal management clear at the state, regional or local scales?

Roles and responsibilities for pest management are not clear at any level. Part of the problem stems from confusion, particularly by the general public, about what constitutes a “pest animal”. In NSW a “Pest Animal” is identified by a Pest Control Order issued under the Local Land Services Act, it is only “pest animals” so declared that are required to be controlled by the landholder where they occur. There is no control obligation on any other species that are regarded as pests by landholder.

There is confusion amongst landholders about the role of the Regulatory Authority (namely LLS). While the LLS has an enforcement role it also under the LLS Act has a role in coordination, education, capacity building and assistance in control programs. The boundaries around these roles are not clear.

There is a common belief that most pest animal problems stem from public land e.g. National Parks and State Forests. However while some public lands are not well managed inadequately managed private lands create the same problems.

What works well with the current institutional arrangements? Where are the examples of good institutional arrangements for pest animal management?

Most of the effective current institutional arrangements have been identified in the Issues Paper.

Plague Locust control provides an example of an effective institutional arrangement.

Landholders have the primary control responsibility, the Plague Locust Commission or Department of Agriculture provides chemicals to landholders for initial control. These organisations with LLS monitor outbreaks and when the outbreaks spread beyond the capability of the individual to control the Authorities take control and implement control programs. Funding can be provided through landholder levies.

What is the appropriate level (state/regional/local) for delivery of pest animal management functions such as planning, enforcement, education etc?

- State responsibility should be to provide effective legislative framework, strategic goals or objectives and some funding for crucial control activities. Overall planning cannot be achieved without a level of State funding.
- LLS is the appropriate body to deliver regional planning, establishing regional priorities, public education, capacity building and delivery of on ground programs.
- It is difficult for the body responsible for delivery of these LLS functions to effectively carry out a regulatory or enforcement role. To carry out these functions a high level of landholder trust and co-operation is required. If the person delivering these services is the same one who has an enforcement function or comes from the organisation with the enforcement function this trust and co-operation is difficult to achieve. It would be more appropriate for the enforcement role to sit with The Department of Agriculture or EPA.
- Local groups of landholders are crucial for the effective implementation of on-ground programs. LLS has a major role with landholder contact and development of cohesive and cooperative local control groups. In this respect groups that have a high level of commitment from the majority of landholders in the local group area have proved to be most successful.

What arrangements can enable issues to be managed at the appropriate scale for efficiency and effectiveness?

The first step to overall pest control is to revise the process for declaring pest animals. All non-indigenous animals should be declared as pest species in order to be able to impose a control obligation on landholders who will not participate in control programs.

However enforcement should be the last step in the process of achieving effective control. Education, capacity building, planning and cooperative participation in implementation are the most effective methods but must be backed up by an effective enforcement regime as a last resort.

In order to achieve effective landscape scale control cross tenure programs are required involving both private and public land managers with equal responsibility to implement agreed control measures.

A landscape scale, cross tenure approach could be:

- Experts in the field (local control group, LLS, scientific experts) agree on an area where control of an identified pest species must occur;
- Minister issues a control order for that area requiring all landholders to cooperate and participate in a control program employing the agreed control methods;
- LLS and local control group plan and implement the program in conjunction with all landholders within the control area:

- Enforcement authority has then has the necessary legislative to take action against uncooperative landholder as a last resort.

This approach could be adopted for pest or problem animals and provides sound scientific and legal backing for the program.

What are the triggers for government intervention in pest management? When is it the Government's role to intervene in pest animal management?

The Government's role in pest animal management should be triggered when scale of the problem moves the impacts from private benefit to the broader public good.

The public good benefit could be either an economic impact extending beyond the affected individual(s) or an environmental impact.

Are current compliance and enforcement arrangements effective, if not, why not?

The current provisions of the Local Land Services Act do not provide an effective framework for the enforcement of Pest Control Orders on uncooperative landholders.

It should be noted that the enforcement provisions of the LLS Act only apply to declared pests.

In order for the Regulatory Authority to be able to take action against an uncooperative landholder an individual eradication order must be issued. The legislation sets out the steps required for the issuing of an order and provides the landholder the right to appeal all through the process. The time required for this process can mean that the pest has move on. If the matter has to go to court the Regulatory Authority will be required to prove that the pest is resident on that land. All the current declared pests (except rabbits) are highly mobile and it is almost impossible to establish this proof.

The LLS Act provides different responsibilities for pest control on private and public land managers. The Act imposes a destruction obligation on both classes of landholders which is to eradicate the pest by any lawful means. However the Act provides a different definition of "eradicate" for private managers to that for public land managers. For private land manager "eradicate" means to continuously suppress and destroy. For public land managers the requirement is to ensure that the pest does not cause harm on any land.

While in theory the LLS Act allows the Regulatory Authority to issues control orders on a private landholding this does not apply to public land managers. The Regulatory Authority must consult the relevant Minister in the case of an uncooperative public land manager. On the rare occasions this is done the outcome is unlikely to be satisfactory. For example the reluctance of some National Parks and State Forests managers to participate in wild dog control program.

How can accountability and performance monitoring for pest management be improved?

Establishing separate bodies for the education, capacity building, planning implementation and reporting functions and the enforcement function will greatly benefit the willingness of landholders to engage with the extension body. Improved engagement with all landholders will improve reporting and enhance data collection.

A clear definition of what constitutes a pest animal is also essential and also where control responsibility lies.

Has anything worked well in the past but can no longer do so because of limited resources?

The annual wild dog aerial baiting program in the northeast of the State which commenced in 1962 worked very effectively until the mid-1990s when large tracts of previously controlled public lands were removed from the program. It was a coordinated program which extended from Maitland to the Queensland border covering the tablelands to the coast. During the period 1962 to approximately 1996 wild dogs continued to exist in the timbered country but in numbers that maintained stable populations that rarely moved into grazing country. The removal of large tracts for the program has played a large role in the build-up of wild dog populations and the spread of wild dog into previously unaffected grazing country.

The reduction in wild dog control in the northeast is both a resourcing issue and a philosophical issue with State Forests reluctant to commit funds and some National Parks managers reluctant to undertake wild dog control.

What do you consider good practice for encouraging community-based pest management and changing landholder practices?

Wild dog management plans provide a good template for community-based pest management programs.

To be effective community based programs must have input from Local Land Services but it is essential that local landholder take responsibility for driving the development and implementation of the plans. Over involvement of LLS staff will be counterproductive and eventually individual landholders will drop out of the implementation and the whole responsibility for on-ground work will be left to LLS staff. When this happens the programs fail.

Do you feel that the current education/awareness programs are working? Why? Why not?

One of the barriers to acceptance of education/awareness programs is an attitude amongst landholders that if they are not impacted by the particular pest it is not their problem. Education and awareness programs need to focus landholder attention on the likely hood that if the pest is not controlled at its source it will become their problem

At what scale (local, regional, state) are awareness-raising programs most effective?

Awareness programs are most effective at the local level with input from the Local Land Services. Neighbour to neighbour contact and peer pressure has proved to be the most effective method of raising awareness and participation.

How can community-based pest management programs be better aligned to ensure efficiency and effectiveness of effort?

Community-based pest management programs must be based on the need to achieve an effective knock down on the target species. The program must have clearly defined targets for participation and outcomes. The control methods employed by the program must be capable of achieving a knock down that reduced the target population. Research has been established, with a high level of confidence, that to be effective a pest animal control program must achieve at least a 75-80% knock down of the target species.

The program must adopt the methods that are capable of achieving this level of knock down. For example feral pig and wild deer programs that have relied on hunting as a control measure have seen large increases in the populations of these species.

Do industry bodies need to be better engaged to enable more collaborative approaches? If so, how?

Industry bodies major function is in engagement with Government to raise awareness of the impacts of pest animals on their industry.

Industry bodies can play a role in conjunction with Local Land Services in engaging with their members. While industry bodies can provide some funding reliance on this source for long-term programs can be counterproductive and unsustainable if industry funds become restricted.

What criteria should be used for prioritising pest species?

All non-indigenous animals should be identified as a pest species with an obligation on all landholders both public and private to control.

Are the current resourcing and funding arrangements sufficient?

Current funding arrangements are insufficient to adequately achieve the knock-down of pest animal species to reduce populations.

The economic pressures on landholders engaged in pest animal programs inhibit their ability to completely cover the cost of the programs and the private benefits achievable are usually outweighed by the costs. A system of assessing the public and private benefits is required with a mechanism to for public contribution. The private benefits of pest animal control are economic, social and environmental as are the public benefits, the proportions are different.