



**Submission to the  
NSW Natural Resources Commission**

***State-wide review of NSW pest animal management***

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## 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's stance on the current management of pest animals in NSW is that whilst effective practices are found in some districts, in the majority of cases pest animals are reaching plague proportions with devastating impacts both on agricultural production and the environment. Fragmented administration and a failure to resolve conflicting policy objectives has led to inconsistent implementation of programs, fragmented planning and confusion across multiple responsible authorities, wastage of funding and high levels of frustration and friction in some communities.

The Association welcomes the NSW Government Natural Resources Commission (NRC) state wide review of pest animal management which is a result of a pre-2015 NSW state election commitment, documented in a memorandum of understanding (MOU) between the now Liberal/National Government and the Association. The Issues Paper developed by the NRC is comprehensive in its outline of issues and the Association will use this opportunity to present the main issues as experienced by our membership, who are based in each and every region of NSW and who have identified varying concerns with the way pest animals are currently management in their district. We will also put forward recommendations which concern pest animal management on a state-wide scale.

Primarily, the Association submits that there could be major efficiency gains in land management (including pest animal management) if a holistic approach is taken to natural resource management on a regional basis in NSW. This means utilising the pre-existing statutory functions of various government agencies to ensure that triple bottom line outcomes are being optimised in each stakeholders' participation in natural resource management. Key to these efficiencies will be ensuring that management obligations are consistent across the landscapes, regardless of who owns or manages the land.

## Summary of recommendations

**Recommendation 1:** Coordination including visibility should be a key focus of any and all pest animal management programs across NSW.

**Recommendation 2:** Across all natural resource management legislation affecting businesses and community members “on-the-ground” in NSW, include a means to address unnecessary prevention of optimal pest animal management in NSW.

**Recommendation 3:** Ensure the timely availability of data and information about environmental research and monitoring activities.

**Recommendation 4:** Provide easier pathways for upgraded research on biological controls and other control measures for pest animals, and dissemination.

**Recommendation 5:** Broaden the base of the LLS rates to include from 2ha landholdings and land under public management.

**Recommendation 6:** Review the arrangements for LLS as leaders and experts in pest animal management in order to better manage natural resources.

**Recommendation 7:** Efficiencies gained through consolidation of resources – for example, the use of pre-existing weed control authorities, or biodiversity officers, or DPI water officers, to assist in a holistic approach to pest animal control.

**Recommendation 8:** Ensure that the pest management obligations are completely consistent across all tenures to set a foundation for true shared responsibilities.

**Recommendation 9:** The pest animal management system should be ‘prioritised’ according to the problems identified by each locale, using plans and processes that are consistent across NSW.

**Recommendation 10:** Integrate pest plant and pest animal management using advisory committees that feed into the LLS Boards across NSW, and a state-wide advisory committee.

## Introduction

Pest animals have potentially devastating impacts at the farm level, and in a wider societal context have major economic, environmental and social impacts across the landscape. Many pest animals cause significant damage to crops and seriously affect Australia's livestock industries by preying on stock and competing for pasture. They also cause severe land degradation by promoting soil erosion, stream turbidity and the spread of weeds. Competition, habitat destruction and predation by pest animals threaten the survival of many of Australia's native plants and animals.

As indicated above, NSW Farmers' general policy position is that the current pest animal control effort is failing. Some areas in relation to particular species have seen recent improvements in the effectiveness of control, however overall the on-ground management of pest species could be markedly improved.

Wild dogs are reaching or are at plague proportions in some areas of NSW, and we are hearing reports of an increasing amount of wild dogs in areas (such as the coastal regions of NSW) where they have previously not been seen. The predation by wild dogs on sheep and cattle is having a major financial and social impact on farm families across NSW. Wild dogs are vicious invasive pest animals when marauding on private land, and this problem is exacerbated when wild dogs on public lands are not managed effectively. Pigs, foxes, feral cats, deer and goats are also an increasing threat to commercial farming and to biodiversity. Feral pigs in particular attract illegal pig shooting activity on private land, creating an additional threat and safety concern to farming families.

Fragmented administration and a failure to resolve conflicting policy objectives has led to inconsistent implementation of programs, fragmented planning and confusion across multiple responsible authorities, wastage of funding and high levels of frustration in the community.

Under current arrangements, the provision and management of pest animal control varies markedly from Local Land Services (LLS) region to region. The programs that are run within each LLS lack the coordination between themselves, and the visibility of what the others are doing. Coordination within regions and across the state is imperative to address this extremely challenging policy problem.

**Recommendation 1: Coordination including visibility should be a key focus of any and all pest animal management programs in NSW.**

## Guiding principles

NSW Farmers supports the number one guiding principle – arrangements should aim for best outcomes on the ground. We support this principle, from research and development to more effective delivery and extension from the LLS. We strongly suggest the prioritisation of actions that would see a reduction in the numbers and effects of pest animals in NSW. NSW Farmers main point on this guiding principle is the amount of intersecting legislation that considerably affects the outcomes that landholder and regional communities in particular will experience as a result of this review.

Currently in NSW we are experiencing significant policy reform in the areas of biosecurity, public land management and biodiversity. Biosecurity arrangements are to be streamlined and sit under a new *Biosecurity Act 2015* (not yet commenced), and we assume any arrangements as a result of this review would form a regulation under that Act. We also await the final form of legislative change as a result of the NRC's review of weed management in NSW<sup>1</sup> which we expect will also form a regulation under that Act. The NSW Department of Primary Industries also recently drafted their NSW Invasive Species Plan 2015-2022 which is to replace the previous 2008-2015 version. The final Government response of the NSW Crown Lands review was also recently released<sup>2</sup>, and a review into Travelling Stock Routes (TSRs) is currently underway through the Local Land Services.

Another significant change relevant to sustainable land management in NSW is the changes occurring as a result of an independent panel's review of biodiversity in NSW in 2014, legislation for which is currently being devised by a Senior Officers Group across the Planning, Primary Industries and Environment Departments of the NSW Government, with draft legislation expected by early to mid 2016.

The Association believes that with piecemeal reform that is occurring, policy makers must address the cross over that occurs between biosecurity arrangements, biodiversity arrangements, public land management arrangements, pest plant species arrangements, and pest animal arrangements. Furthermore, where one legislative arrangement is hindering the objectives of the other, there must be a means to address the problem from within the legislation itself. This could be done by including rules and regulations where the overall outcome could be better in the experience of the people on the ground.

For example, current native vegetation legislation can prevent or hinder effective pest animal control and place enormous restraint on what could be achieved on a triple-bottom-line basis. There could be a far better environmental and pest animal management outcome if the pieces of legislation could take on a more holistic approach.

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<sup>1</sup> NSW Government Natural Resources Commission *Review of weed management in NSW* available via <http://www.nrc.nsw.gov.au/weed-management>

<sup>2</sup> NSW Government *Response to Crown Lands Legislation White Paper* October 2015 available at [http://www.lpma.nsw.gov.au/\\_data/assets/pdf\\_file/0004/206680/response-to-crown-lands-legislation-white-paper.pdf](http://www.lpma.nsw.gov.au/_data/assets/pdf_file/0004/206680/response-to-crown-lands-legislation-white-paper.pdf)

Attempting to regulate specific issues without regard to the wider societal context in which it operates is futile and a very clear example of this is pest (and weeds for that matter) animal management because of the *Native Vegetation Act 2003*. Although the NRC are not being tasked to review the Native Vegetation Act we would be disappointed if there was not the opportunity to ensure that recommendations for optimal pest animal control as a result of the pest animal review were unnecessarily hindered by that or other legislation. In fact the independent review panel noted in relation to pest animal management:

*Widespread invasive species – including foxes, feral cats, wild dogs, rabbits, goats, and weeds – have been identified as a threat to more than 70 percent of the state’s threatened species (Coutts-Smith & Downey 2006). In particular, feral cats, red foxes and wild dogs are the main predators threatening fauna (Coutts-Smith et al 2007). These threats are difficult to control as they are widespread and expensive to manage (Coutts-Smith & Downey 2006, Coutts-Smith et al 2007).<sup>3</sup>*

Because pest animal management is a part of overall sustainable land management practice, in order to achieve truly triple bottom line outcomes, there must be the ability for cross-checking the various pieces of legislation.

**Recommendation 2: Across all natural resource management legislation affecting businesses and community members “on-the-ground” in NSW, include a means to address unnecessary prevention of optimal pest animal management in NSW.**

The remaining principles as outlined on page 3 of the NRC Issues Paper, of shared responsibility, evidence-based, adaptive, cost-effective and accountable are absolutely supported by the Association.

In terms of evidence-based programs, NSW Farmers’ members would like to see an improvement to 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.

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.

**Recommendation 3: Ensure the timely availability of data and information about environmental research and monitoring activities.**

<sup>3</sup> Independent Biodiversity Legislation Review Panel (Dr Neil Byron , Dr Wendy Craik AM Dr John Keniry AM Professor Hugh Possingham) *A review of biodiversity legislation in NSW Final Report* December 2014, page 3.

**Recommendation 4: Provide easier pathways for upgraded research on biological controls and other control measures for pest animals, and dissemination.**

## **Roles and responsibilities**

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 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.

### **Improvements to the Local Land Services (LLS) model**

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 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. Currently only private landholders over 10 hectares (20 hectares in some Southern areas and 40 hectares in the Western Division) are rated through LLS, creating a bigger burden on those landholders who are already shouldering a lot of the cost of pest animal management on farm, the latest available statistics showing the expenditure (for natural resource management activities including pests and weeds) at around \$12,000 per year per farm<sup>4</sup>. We believe that broadening the base of the LLS ratings will significantly improve the true 'shared responsibility' aspect of pest animal management.

**Recommendation 5: Broaden the base of the LLS rates to include from 2ha landholdings and land under public management.**

Currently the LLS are developing 10 year strategic plans, and NSW Farmers has recently provided feedback in the form of recommendations for the improvement to the draft strategies. During the formation of the LLS structure, NSW Farmers stressed the importance of localised plans to guide LLS (including a local presence), along with clear leadership. At the 2015 NSW Farmers annual conference, members passed a motion calling for a review of the Local Land Services with a specific mention of pest animal management.

<sup>4</sup> Australian Bureau of Statistics *Natural Resource Management on Australian Farms 2006-07* available via <http://www.abs.gov.au/ausstats/abs@.nsf/mf/4620.0>

It is the experience of NSW Farmers members as LLS ratepayers that leadership is lacking in both an LLS context and a pest animal management context in general. The following statement is extracted from our recent submission on the LLS strategic plan/s<sup>5</sup> 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 state<sup>6</sup>. They believe 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.'<sup>7</sup>*

**Recommendation 6: Review the arrangements for LLS as leaders and experts in pest animal management in order to better manage natural resources.**

NSW Farmers strongly believes that the appropriate level for delivery of pest animal management functions is at a local or district level. The appropriate level for planning is at a state and regional level so as to improve consistency of delivery. There of course needs to be adaptability at every level so common sense can prevail. We note the question posed in the Issues Paper in relation to roles and responsibilities: *What are the triggers for government intervention in pest management? When is it the Government's role to intervene in pest animal management?*<sup>8</sup> NSW Farmers is of the firm view that Government's role is not about intervention but rather sharing the burden of responsibility throughout the entire process. 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 arms of Government are operating independently and are therefore too easily under resourced because they are lacking in the higher level accountability. To give a straightforward example, NSW Farmers members have noticed particular and very damaging pest and weed problems arising on land surrounding several state-owned water assets. We are pushing for a review of management strategies and procedures employed by water authorities<sup>9</sup>. The requirement could be that the on-site water

<sup>5</sup> NSW Farmers Association *Feedback on Local Land Services draft Strategic Plan(s)* November 2015 page 2 available via [nswfarmers.org.au](http://nswfarmers.org.au).

<sup>6</sup> 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.

<sup>7</sup> LLS Draft Strategic Plan, p. 10.

<sup>8</sup> NSW Natural Resources Commission *State-wide review of NSW pest animal management Issues paper* page 8.

<sup>9</sup> NSW Farmers policy motion passed at the 2015 annual conference: *That the NSW Government regularly review the management strategies and procedures employed by NSW Water in the management of their land surrounding water utilities, especially in relation to effective pest and weed control.*

inspector is to provide pest species reports/and or authorisation for pest control activities, whilst there for the other primary (water) purpose. The second element is of course, requiring public land managers to control pest species in a way that is expected of private landholders.

We imagine 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 recommends that efficiency gains found by taking a holistic approach to the legislation mentioned above would go a long way in resourcing the optimal pest animal management scenario.

**Recommendation 7: Efficiencies gained through consolidation of resources – for example, the use of pre-existing weed control authorities, or biodiversity officers, or DPI water officers, to assist in a holistic approach to pest animal control.**

## Shared ownership

NSW Farmers supports the sentiments raised in the NRC's Issues Paper surrounding shared ownership and in particular the point that 'stakeholders are looking to Government to take a lead role in pest animal management particularly in the provision of strong oversight, coordination and capacity building, as well as management of pests on public lands. However, support is essential from landholders, industry and the wider community.'<sup>10</sup>

NSW Farmers is of the firm view that if management obligations were consistent across tenures, an increased amount of community ownership would naturally result. At the moment in many areas the challenge is just too great when farmers in any given district are dealing with not only reluctant landholders or neighbours, but also parcels of land that are owned by Government and not being managed which intensifies the challenge significantly. In NSW Farmers' experience, the programs that are the most effective and long lived are the programs that are owned and driven by the affected community members.

**Recommendation 8: Ensure that the pest management obligations are completely consistent across all tenures to set a foundation for true shared responsibilities.**

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<sup>10</sup> NSW Natural Resources Commission *State-wide review of NSW pest animal management Issues paper* page 10.

## Priority pest species

NSW Farmers supports the principles outlined<sup>11</sup> in the NRC's Issues Paper about priority pest species although it is not entirely clear what is attempting to be achieved by prioritisation and the requests for what stakeholders think the review should focus on. The Paper lists the pest animal groups that fall within the parameters of the review as wild dogs, rabbits, foxes, feral cats, pigs, goats, feral horses, wild deer, birds, rats, mice, camels, and carp and tilapia. In NSW Farmers opinion this is a relatively short list and all of these pest species would be the focus of the review. In terms of numbers from an agricultural perspective, In NSW Farmers' experience, as an Association speaking to farmers every day, anecdotally staff hear concerns about wild dogs, pigs, foxes, cats, goats, deer and feral horses the most out of the NRC's list. That is not to say the other species are not worth prioritising, as we believe that if the system is set up correctly, it doesn't matter what the pest species is that is being targeted, the relevant plans at a local, district, regional, and state level would provide a framework to respond to the relevant pest species.

This is not to say that 'priority' i.e. more destructive and abundant pest animals such as wild dogs should be given the same treatment as less extensive (in terms of geographical spread) species such as wild horses. Our position is that

- There should be a clear process for determining priority species in any given locale
- There should be a clear process for each layer of government in its role in addressing the 'priority species'.

**Recommendation 9:** The pest animal management system should be 'prioritised' according to the problems identified by each locale, using plans and processes that are consistent across NSW.

<sup>11</sup> NSW Natural Resources Commission *State-wide review of NSW pest animal management Issues paper* page 11.

## Landscape approach

NSW Farmers supports a landscape approach to pest animal management and we believe that the holistic approach to natural resource management embodies this approach.

Strategy and adaptability are extremely important and to NSW Farmers' members, it would include operating on outcomes that provide the best triple-bottom-line outcome across all of NSW natural resource management legal frameworks. Management of weeds and pests could be integrated using the set up currently being arranged by Local Land Services for the State Weeds Committee and regionalised weeds advisory committees.

**Recommendation 10: Integrate pest plant and pest animal management using advisory committees that feed into the LLS Boards across NSW, and a state-wide advisory committee.**

## Conclusion

NSW is currently experiencing extensive and promising reform across a number of natural resource management contexts. NSW Farmers' position on pest animal management is that it must be part of an overall holistic approach to managing natural resources along with biodiversity and biosecurity legislation. We believe tenure-neutral responsibilities will be a key element to this approach. Where Government agencies are effective at extension and/or compliance work these models could be copied or the resourcing combined to boost the specialised pest animal management programs that should be occurring following state-wide consistent plans. In the experience of NSW Farmers' members, LLS staff are currently under resourced and/or do not carry the relevant expertise to truly embody the principle of enhancing the natural resource base as per the LLS' mandate, which requires reviewing and refreshing. We appreciate the opportunity to engage with the Natural Resource Commission and its extensive Issues Paper and we look forward to the review findings.