

Submission to the
Natural Resources Commission

Review of NSW Invasive Species Management

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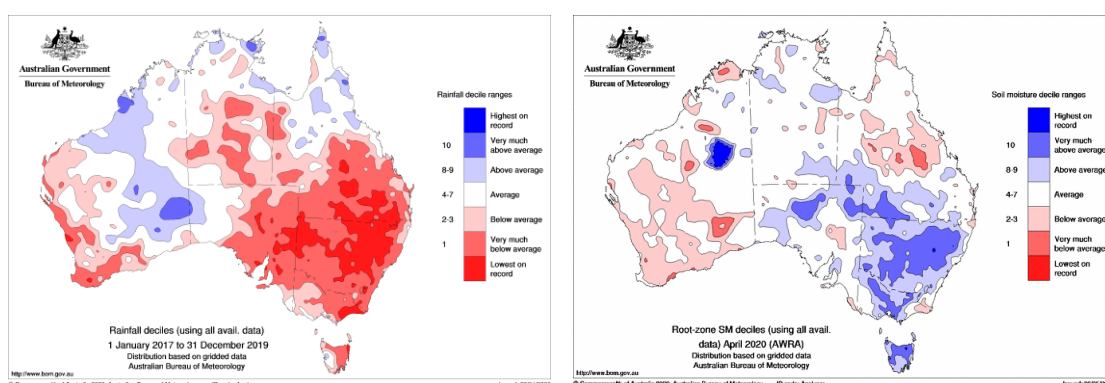
RESPONSE TO KEY REVIEW QUESTIONS

1. To what extent are the NSW environment, industries and communities currently impacted by invasive species?

Comment

The true extent and magnitude of the social, economic, and environmental impacts of invasive species in NSW is incalculable. It is fair to say all industries in both regional/rural and urban communities are affected either directly or indirectly by invasive species.

Agricultural productivity in NSW recovered in 2020-2023 following the 2017-2019 drought.



Source: Australian Bureau of Meteorology

Favourable conditions since 2020 have also seen recovery from the 2019 bushfires with extensive vegetation regrowth in national parks, state forests, other affected crown lands and private holdings. As anticipated, all invasive species have recovered in parallel with the return to favourable environmental conditions.

Feral pigs especially are recognised as a major and unrelenting problem in the National Feral Pig Action Plan 2021-2031 (NFPAP). An incursion of foot and mouth disease would cost in excess of \$50 billion to Australian agriculture.

2. To what extent do you think existing programs in NSW are effectively managing invasive species?

Comment

In a word, poorly. Despite the massive, combined expenditure and effort by NSW government agencies to control pests, regrettably it is intermittent and therefore inconsistent with the key principle of sustained action and investment over the long term.

The lack of recurrent (annual) funding, lack of engagement with private Vertebrate Pest Animal Control (VPAC) licence holders, Recreational Hunting/Vermin Control licence holders, and lack of sustained pest management effort on public land effort is a major shortcoming of existing programs.

3. What, if any, are the key barriers to effective management of invasive species?

Comment

There are many barriers to effective management of pest species, including:

- Lack of engagement with all stakeholders

There is an ongoing reluctance by NSW agencies to embrace, engage and utilise non-government firearm licence holders in the management of invasive species in this state. Firearm licence holders including Vertebrate Pest Animal Control (VPAC) licence holders, Primary Production licence holders, and Recreational Hunting/Vermin Control firearm licence holders are actively obstructed and prevented from participating in pest control programs by government agencies.

On more than one occasion farmers in north-west NSW have contacted my office and reported that Local Land Services (LLS) personnel in their region advise that there are NO “authorised campaigns” in place. This is a de-facto tactic to prevent the issue of category D firearm licences by the NSW Firearms Registry.

- Intermittent rather than continuous control

The National Feral Pig Action Plan calls for *sustained* action and investment over the long term and building capacity and capability of community-led efforts.

Regrettably, budgetary allocation decisions by NSW Treasury do not allow allocation of recurrent (annual) funding of pest animal control programs. This has a profoundly adverse impact on the continuity of both government-led and community-led pest control efforts.

- Legislative and regulatory impediments

It is widely acknowledged that semi-automatic firearms improve the effectiveness and efficiency of culling invasive species. Licences for semi-automatic (category D) firearms however are highly restricted and are only available for the genuine reason of *Vertebrate Pest Animal Control*.

In the interests of providing bona fide farmers (only) with the means to efficiently deal with invasive pests on their or their neighbour’s property, I suggest that a second genuine reason, namely ‘Primary Production’ be added to eligibility requirements for issue of a category D licence.

4. How has invasive species management changed since the introduction of the [NSW Biosecurity Act 2015](#) legislation and associated programs and plans?

Comment

A key aspect of the Biosecurity Act 2015 is recognising that biosecurity is a shared responsibility between government, industry, and communities. Regrettably, NSW agencies continue to impede VPAC firearm licence holders from bidding for contracts to participate in pest management on public lands.

5. What are the future risks posed by invasive species to the NSW environment, industries and communities?

Comment

The future risks posed by invasive species have been identified many times. There is perhaps no greater risk posed by invasive species than the catastrophic impact that Foot and Mouth Disease (FMD) would have on the agriculture sector if it were ever to enter Australia.

I refer readers to reports on the human health impacts of invasive species.

6. What opportunities do you see to improve the outcomes of invasive species management in the future?

Comment

- A genuine and sincere commitment by the NSW government to *competitive neutrality*¹ recognising that Local Land Services under the provisions of s3 and s14 of the Local Land Services Act 2013, operates as both a regulator and service provider, and therefore has an inherent conflict of interest. I refer readers to the recently published IPART report *Competitive Neutrality in NSW – Final Report, May 2023*.
- Removal of legislative and regulatory impediments preventing bona fide primary producers (only) from accessing category D firearms. This could be rectified simply by including 'Primary Production' as a second genuine reason for the purpose of being issued a category D firearms licence.
- Embrace and engage with professional Vertebrate Pest Animal Control (VPAC) licence holders to undertake control of pest animals in national parks, and on other public lands.
- Acknowledge and encourage responsible recreational firearm licence holders to engage with private landholders to undertake pest control on private land.
- Undertake a review, including public consultation on the role of bounties in reducing invasive species. I note a fox bounty has been operating in Victoria for some years now and has led to reductions in localised fox populations (Department of Energy, Environment and Climate Action, Victoria).

REFERENCES/BIBLIOGRAPHY

Australian Pork Limited. [National Feral Pig Action Plan 2021-2031](#)

Michael Burt. Feral pigs in the state election space. [The Farmer, 21 March 2023](#)

IPART [Competitive Neutrality in NSW – Final Report, May 2023](#)

Department of Energy, Environment and Climate Action (Victoria). [Victorian fox and wild dog bounty](#)

¹ Competitive neutrality is the principle that a government business should not have a competitive advantage (or disadvantage) as a result of its government ownership. Competitive neutrality policies aim to promote fair and efficient competition between public and private businesses.