

1. What do you consider to be the main impacts (consequences) from marine pests to your business, industry, activities or the environment?

The restrictions on vessel movements and other port related activities resulting from an incursions.

2. What activities should the Australian Government do to manage the biosecurity risks associated with marine pests to an acceptable level (to protect your business, industry, activities or the environment)?

Organise and manage/undertake the baseline monitoring activities Australia wide to ensure consistency and transparency. If delegating to State entities, a National Framework should set the expectations, based on risk.

3 . What information or data should the Australian Government collect to support ongoing national commitment to managing marine pest biosecurity?

Data on international incursions, and the risks they pose to Australia.

A good understanding of the risks and vectors of Marine Pests.

4 . What are the best ways to manage and monitor the biosecurity risks of biofouling on vessels?

As above, in order to focus resources in the right places.

5. If the Commonwealth progresses to regulate the management of biofouling on international vessels, what role should it take in the development of domestic controls by the states and territories?

Set the National Framework based on International requirements, so it can filter down based on risk

6. Should the Department consider a regulatory framework for international biofouling management that is:

- a species-based approach (as currently proposed in the Biofouling RIS) or
- an approach based on a requirement for vessel operators to adopt IMO Biofouling Guidelines including on-board biofouling management plan and record book?

The latter as it simplifies compliance and therefore should optimise resources. Retention of records for the removal of biofouling and resourcing compliance to the expectations/ obligations will be important. The 'rogues' in each port could skew the risks so should be considered.

7. How can the Australian Government cost-effectively manage domestic ballast water risks, while preventing the spread of established marine pests?

By ensuring the data required to assess the risk is collected , interpreted and stored appropriately. Which requires a good monitoring strategy to be developed, aligning the risks and resources, and clear responsibilities for managing the function.

8. Should species-specific assessments of port-to-port movements, with associated monitoring, be used?

Probably, but comes back to the risk of incursion and its potential impact.

9. Should we restrict ballast water movements between suitably determined regions?

With restrictions comes issues with compliance and associated resourcing. If deemed necessary, it could be beneficial to provide ballast exchange zones which in turn can be monitored accordingly.

10. What are the most important aims(s) for monitoring in a cost-effective national marine pest biosecurity system?

That it is based on an appropriate level of risk, including funding at a National level, by Government.

11. How should this monitoring be achieved?

Via a National Strategy led by Government with assistance by other interested stakeholders at the appropriate level.