



5 Milner Street,
Hindmarsh SA 5007
Phone: (08) 7127 4630
Email: ncssa@ncssa.asn.au
Website: www.ncssa.asn.au
ABN: 40 538 422 811
GST registered

Independent Review Panel
Intergovernmental Agreement on Biosecurity
C/- IGAB Review Secretariat
Department of Agriculture and Water Resources
GPO Box 858
Canberra City ACT 2601
igabreview@agriculture.gov.au

March 2, 2017

Re: Intergovernmental Agreement on Biosecurity Review Draft Report

The Nature Conservation Society of South Australia (NCCSA) welcomes the opportunity to provide a submission on the Draft Report on the Review of the Intergovernmental Agreement on Biosecurity and appreciates the extension of time to enable us to do so. As South Australia's primary nature conservation advocacy organisation, the NCCSA has an active interest in the protection and conservation of South Australia's natural resources with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities, management of protected areas and remnant native vegetation. Since 1962, NCCSA has been a strong advocate for better laws and policies to protect natural ecosystems in South Australia from the impacts of pest plants and feral animals. We strongly believe that this review and its recommendations present a very significant opportunity to address current and emerging biosecurity threats to Australia's native wildlife and natural areas in the face of climate change, increased urbanisation and shifting global biosecurity challenges.

We commend the Independent Review Panel for their efforts in the review process and the increased emphasis on the importance of environmental biosecurity and risks posed by both established and new/emerging pest plants and animals to biodiversity conservation across Australia. We endorse the comments provided by the Invasive Species Council in their submission on the draft Report in particular the recommendation for the Chief Environmental Biosecurity Officer position to be located within the environment department and the establishment of a new environment committee under the National Biosecurity Committee.

Please refer to the following pages for our feedback on key areas of importance to NCCSA outlined in the draft Report. If you would like to clarify or discuss any of the points raised please contact me on (08) 7127 4633 or via email at nicki.depreu@ncssa.asn.au

Yours sincerely,

Nicki de Preu
Conservation Ecologist
Nature Conservation Society of South Australia

NCSSA Feedback on Key Areas of the Draft Report

Knowing and owning our roles and responsibilities

[Feedback request 1](#) The Review Panel seeks feedback on the draft roles and responsibilities of national biosecurity system participants.

We support the draft roles and responsibilities of stakeholders with an interest in national biosecurity identified in Table 1 in the draft Report and acknowledge the importance of clarifying these roles and responsibilities as a first step in developing a shared sense of responsibility for national biosecurity.

Although the table format enables all participants to identify their key roles and responsibilities it might be better to present the information as a diagram with key headings that include shared areas of responsibility e.g. managing declared established pests and diseases is the responsibility of all stakeholders identified in the Table including Australian/State/Territory governments, Local government, Industry, Community and NGO's. This approach might provide a more holistic view and better understanding of the shared responsibility that each stakeholder has in relation to national biosecurity rather than treating each group separately.

There are also a large number of NGO's that actively manage or own land across Australia e.g. Australian Wildlife Conservancy, Bush Heritage Australia and the Nature Foundation to name a few. NGO's such as these also have responsibility for managing declared established pests and diseases on the land they manage. We recommend the last dot point is amended to reflect this situation.

As stated in our submission on the discussion paper we recommend that there is a need for better linkages and understanding of the relationship between national biosecurity priorities and those identified at jurisdiction level including Regional NRM Plans. Regional NRM bodies also have a very strong role in ensuring that local communities have a clear understanding of the associated risks of priority pests and diseases that may affect both agricultural production and social and ecological systems. Most have also undertaken regional risk assessments for pest plants and animals so it is important to ensure that these are consistent with, and feed into, the processes to be applied at a national level. We consider the NRM Boards and staff have a key role to play in ensuring buy-in from local communities and industries and processes to identify regional priorities for investment through engagement, discussion and education. We recommend this area still requires further clarification in the draft Report.

Research and innovation

[Feedback request 3](#) The Review Panel seeks feedback on the options for a new entity for cross-sectoral biosecurity R&I.

We strongly support the proposal put forward by the ISC for the establishment of a new stand-alone, permanent entity for cross-sectoral biosecurity R&I - with governance structures that include environmental interests and purposes, and with an appropriate funding stream to support environmentally focused research. We strongly recommend that further research on the impact of climate change on the distribution and abundance of pest plants and animals is an important priority for the next two decades that should be further acknowledged in the draft Report with a specific recommendation relating to this area of R&I.

Strengthening governance

[Feedback request 4](#) The Review Panel seeks feedback on the proposed Terms of Reference for the NBC.

We strongly support the recommendation by the ISC in their submission on the draft Report for the establishment of an environmental biosecurity sub-committee to be written into the terms of reference. We also recommend that an additional term of reference is included that clearly states the objective of the NBC is to provide advice on means of reducing the impact of invasive pest plants and animal species and pathogens on Australia's natural environment.

Measuring system performance

We strongly support the proposal that the NBC should establish a time-limited task group to progress development of a performance framework and performance measures for the national biosecurity system (Recommendation 36) and the need for minimum standards and specifications to be agreed for data sets (Recommendation 38). We commend the Independent Review Panel for the increased emphasis on transparency in terms of reporting on system performance and sharing key learnings gained from biosecurity interventions across jurisdictions.