The Parks and Wildlife Commission of the NT welcomes the opportunity to deliver more effective and more sustainable biosecurity outcomes for governments, industry and the broader community through a national framework for managing established pests and diseases of national significance. The advantage of this approach is greater focus on outcomes for public and private benefit.

Currently, there is considerable funding allocated to management of well-established pests. While these pests cause significant environmental damage, in many cases, they have become established or 'naturalised' and the natural ecosystem has begun to adapt to their presence. Rather than pursuing management of these populations, funding could be better used to implement prevention strategies for new incursions. Equally, as stated in the document, asset based management may be most cost-effective for an individual and/or the community – since asset-based protection will reduce damage to infrastructure, facilities and other community values.

The Parks and Wildlife Commission supports the proposed policy principles, which will see greater focus on asset-based protection and shared responsibility between landholders, community, industry and government. This will lead to significant savings, while also leading to improved outcomes, greater prioritisation, enhanced innovation and more effective pest/disease management.

The Parks and Wildlife Commission also support the policy principle that where there is national interest in the pest/disease (such as private or public benefit), the jurisdictions will collectively work together under a national management plan or strategy. The Commission is of the view that these proposed policy principles are appropriate, practical and sufficient.

The Commission supports the terms that have been developed to assess the impact of the pest or disease. In terms of the consultation questions, the Commission is of the view that the listing of established pests and diseases of national significance should be open ended (rather than a defined period), subject to management outcomes. A series of criteria should be developed based on the continued technical feasibility of eradication, whether there continues to be ongoing national interests, the cost-effectiveness of the program (current and into the future), possible alternative options for eradication (based on new and emerging technologies), and the estimated time for eradication. The timing of such reviews would depend on the species in question and the level of incursion, however a balance between enabling the eradication program to take place and the need for program review is required. For this reason, it is recommended that a review be undertaken every 3-5 years to make assessment on the ongoing national interest in the program.

The Parks and Wildlife Commission recommends including the following role/responsibility be added to 'Risk creators':

- 'control and manage established pests and diseases to mitigate as necessary effects on the public and private assets, or as required by regulation'.
- 'take reasonable steps to minimise effects of established pests and diseases on other parties and industries, particularly when part of a programme of collective industry- or community-led action'.

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Besides these proposed additions, the Commission is of the view that the proposed roles and responsibilities are both appropriate and practical.

Overall, the Commission supports the collective action in the management of established pests and diseases, recognising the considerable economic, social, community and environmental benefits that will be achieved through a collaborative approach. In doing so, the Commission also recognises that a number of challenges will arise, including:

- Low levels of funding that are accessible to landholders and community groups (which is one of the primary reasons that eradication and management programs have fallen to Government in the past);
- Difficulties in identifying program leaders (i.e. those responsible for delivering the program), which may impact the development and implementation of a coordinated approach;
- Broad acceptance of changes to the roles and responsibilities of landholders and risk creators, in particular.

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