

7 June 2024

Department of Agriculture and Fisheries
c/o Biosecurity Queensland Invasive Plants and Animals
GPO Box 46
Brisbane QLD 4001

Via email: Biosecurity.Capability@daf.qld.gov.au

Response to Draft Qld Invasive Plants and Animals Strategy (QIPAS)

Thank you for the opportunity to provide feedback on the draft Queensland Invasive Plants and Animals Strategy. We appreciate the efforts of the Queensland Invasive Plants and Animals Committee (QIPAC) in developing this strategy and note that it confirms the current direction of biosecurity policy in Queensland.

This strategy is highly consistent with former versions of this strategy and takes a “business as usual” approach. While many positive elements of the former strategy are worth retaining, developing this new strategy provides an opportunity for new ideas and improvements - as suggested in this submission.

The following is our specific feedback.

QIPAS implementation

Strategic action 3.2 Determine priorities and develop Statewide strategic plans for individual invasive plants and animals and specific practices is an example of an action where our organisations’ policy leadership roles can provide meaningful support.

A dedicated QIPAS project team will ensure these statewide plans are implemented during the life of the strategy. A QIPAS project team should involve a dedicated coordinator to ensure the strategy's success, lead strategic action implementation in consultation with scientists and key stakeholder groups, and report to the Queensland Invasive Plants and Animals Committee. The upcoming election and potential change in leadership provide an opportunity to secure adequate funding for implementation.

Resourcing industry and community responses

We also support strategic actions 1.4 and 1.5 recognising the vital role of industry and community early detection, prevention and control. This engagement needs support from long-term funding sources with clear criteria that address state priorities at a regional, landscape or catchment scale. Resourcing should balance environmental, agriculture and community well-being. Outcome-oriented investments can establish best practice control and monitoring for community and industry uptake. Clarity and continuity for funds like the Feral Pest Initiative will avoid short-term, ad hoc, politically driven, ineffective responses.

A regional approach with dedicated coordination

Many invasive plant and animal responses are best delivered at a regional level. Funding regional invasive plant and animal coordinators with dedicated frontline staffing and project resources will ensure that the QIPAS statewide plans are implemented based on local prioritisation. Statutory powers and resources delivered at a regional level in line with practices in other Australian jurisdictions should be considered. Regional coordination will help close existing land management and risk mitigation gaps across a range of public and private tenures. The QIPAS project team should drive the development of the regional coordinator model.

Failure to coordinate pest responses creates gaps in management, where invasive species can find refuge and increase their population. This is an all too common issue when an area-wide baiting program is carried out, and complacent landholders create significant problems for others in the community. An area-wide approach like the Regional Biosecurity Groups in Western Australia helps to ensure that pests and weeds are managed on a landscape scale.

Frontline resourcing

Additional frontline staffing resources are needed. Frontline staff limitations constrain invasive plant and animal early detection, prevention and control. The community and industry can do their part if supported by permanent professional pest management staff. These roles can be delivered through Natural Resource Management groups, Queensland Parks and Wildlife pest management rangers and further support for local government roles.

Succession is a key part of strategic planning. We understand several key Department of Agriculture and Fisheries (DAF) staff in biosecurity roles and permit applications (special use, minor use, and emergency use) are currently at or nearing retirement. Succession planning is necessary to identify critical skill areas to pre-emptively ensure upskilling and training. In the example of crop protection products, if DAF is not able to swiftly prepare permit applications due to a lack of trained personnel, delays could have disastrous consequences.

Spread prevention

This strategy devolves risk, responsibility and costs for on-ground management downwards. The invasion curve model emphasises the role of government interventions at earlier management stages. This model should also provide reliable resourcing to those doing ground-level work managing established invasive plants and animals that cause costly damage and environmental destruction in Queensland. These are well beyond eradication, prevention, or containment. This strategy risks side-stepping government responsibility and devolves on-ground action for spread prevention to those with the least power to implement change at the required scale.

An example is the closure of multiple wash-down facilities because the respective local governments were not resourced to upgrade the infrastructure to meet standards for discharge/runoff. Consequently, regions are more vulnerable to the spread of weeds through unwashed vehicles and machinery. Previously, there was a Queensland weed spread prevention strategy, with a Queensland-wide working group, a coordinator and committed funding - including grant money to local governments to upgrade or build washdown facilities. There was also a database of washdown facilities. At present, it is difficult for anyone wanting to wash down to know where they can find a functional facility. There is a strong need to review the current status of weed spread prevention in Queensland.

Biosecurity, stock routes and conservation areas

Councils with significant primary stock routes in their local area must prepare a stock route management plan. The QIPAS strategy does not mention the Stock Route Network Management Strategy. If inadequately managed, these stock routes could act as invasion pathways throughout an extensive landscape, providing havens for pests and weeds.

Moreover, when landholders apply for freehold conversion of a Grazing Homestead Perpetual Lease (GHPL), the Department of Resources responds with a requirement to widen stock routes. This widening will increase the area under local government management - what additional funding is available to ensure these areas are properly managed? Accompanied by increased camping in stock routes by travellers, this has consequences for

biosecurity. Ideally, groups using stock routes would comply with their GBO, but education is required to promote “come clean, go clean” methods and appropriate waste disposal.

Similar considerations apply to large land acquisitions for new national parks in Queensland. Strategic planning at the state and regional levels is needed to ensure sufficient resources for managing these large areas - to ensure they do not become habitats for invasive species or overgrown with weeds that increase fire risk and intensity. Such outcomes would undermine their conservation potential and increase risk for surrounding landholders and wildlife.

Woody weeds in Great Barrier Reef catchment areas

In Great Barrier Reef catchment areas legislative and regulatory confusion inadvertently discourages mechanical clearing and herbicide control of woody weeds in riparian zones. The result is an expansion of highly invasive woody weed species that damage environmental values and agricultural land use. The QIPAS should have an objective to communicate and coordinate with inter-jurisdictional agencies in and around the Great Barrier Reef to manage large areas of woody weeds in riparian areas and floodplains.

Queensland Feral Cat Management Plan

Feral cats directly contributed to the extinction of more than 20 Australian mammals and put direct pressure on at least 124 Australian species endangered with extinction.

In Queensland, local councils can enforce 24/7 cat containment, pet cat microchipping and have access to a range of cat control tools. Because there is no Queensland feral cat management plan local government responses to roaming cats vary widely. Responses in some areas undermine strong efforts on cat management in others.

A Queensland feral cat management plan should be rapidly delivered through the QIPAS framework.

Research, Development and Extension

From 2012, the Campbell Newman government in Queensland made enormous cuts to the public sector. This resulted in the loss of key scientists and technicians in areas such as Charters Towers, Toowoomba and the Boggo Road Ecosciences Precinct. It had a devastating effect on invasive plant and animal research. The legacy of Campbell Newman’s government has left a lasting impact on staffing in these key areas of RD&E. Restoring this capacity is essential to support and inform strategic planning.

Increasing the burden on the few remaining researchers, the strategy gives researchers the responsibility for “Training and education in best management practice.” It is an unrealistic assumption that this small number of researchers will be capable, supported or resourced to deliver on this expectation.

Designated DAF extension officers are needed for the organised transfer of R&D to those directly responsible for controlling invasive species. Failure to do so will continue to limit the uptake of valuable tools to control invasive species. For example, the splatter gun (or gas gun) is an excellent tool for applying herbicide to lantana foliage and it has been available for over a decade however there is limited uptake and awareness of this tool. Expecting other groups to manage extension given the ad-hoc nature of funding is an ineffective strategy.

Additionally, the strategy is unclear on processes used to guide investment in the Invasive Plants and Animals Research Prospectus. Strategic foresight is necessary to ensure funding continuity, as is presently the case with biological control research, which risks losing momentum due to funding uncertainty.

Thank you again for the opportunity to provide this feedback.

To discuss this further please contact Reece Pianta Invasive Species Council Advocacy Manager 0422 935 665 or reecep@invasives.org.au, Dr Annie Ruttledge Senior Policy Advisor AgForce Queensland 0429 062 852 RuttledgeA@agforceqld.org.au, or Natalie Frost, Nature Campaigner Queensland Conservation Council 0411 074 846 natalie.frost@qldconservation.org.au.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Andrew Cox', with a long horizontal flourish extending to the right.

Andrew Cox, CEO
Invasive Species Council

A handwritten signature in black ink, appearing to be 'Michael Guerin', with a long horizontal flourish extending to the right.

Michael Guerin, Chief Executive Officer
AgForce Queensland

A handwritten signature in black ink, appearing to be 'Dave Copeman', with a long horizontal flourish extending to the right.

Dave Copeman, Director
Queensland Conservation Council