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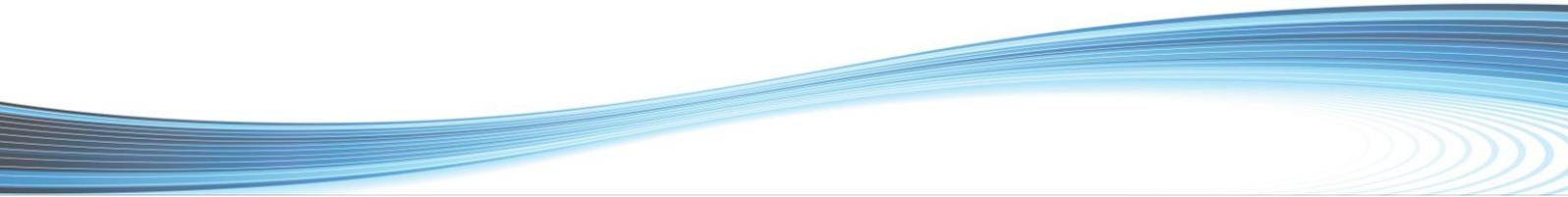
councils **caring** for the coastal environment

## SUBMISSION

# Draft NSW Invasive Species Plan 2015-2022

October 2015

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## Introduction

We are the peak NSW Regional Organisation of Councils representing Sydney coastal councils and the third largest Australian RoC based upon population.<sup>1</sup> We have 25 years' experience leading sustainable coastal management, and harness the individual and collective knowledge of not only our Member Councils but also a suite of technical and academic experts and other stakeholders. Accordingly, we are able to provide unique insights drawing upon the technical, experiential and local knowledge of our Members.

The opportunity to comment on the Draft NSW Invasive Species Plan 2015-2022 (the Plan) is welcomed. Member Councils are concerned with invasive species management in NSW particularly in terms of the impact on biodiversity and water quality. In this submission we provide recommendations in relation to the implementation of the Plan, followed by a brief discussion on the identification of priorities and the structuring of future investment in the management of invasive species.

## Overall Recommendations

As the Plan is a high level document we understand that statements are fairly broad in nature. We do, however, make the following recommendations:

- Ensure alignment and integration with local, state and federal strategies and legislation relating to biodiversity conservation.
- Attach time frames wherever possible and formulate actions in SMART syntax: Specific, Measureable, Action Based, Realistic and Time bound.
- Adequately resource the plan and its implementation and clearly outline its source and longevity.
- Give explicit consideration to and mention of the potential for spread of invasive plant and animal species beyond current climatic limits of distribution as temperature and moisture changes occur.
- Carefully consider the risks of cost shifting from state government to local agencies including councils and local communities
- Emphasise the need for cooperative effort across all sectors by ensuring the Plan explicitly incorporates aspects of regional collaboration. This is critical to effectively address invasive species management across LGAs.

## Discussion and specific recommendations

This draft Plan is an opportunity for the identification and inclusion of new objectives, challenges, and innovative and collaborative actions and outcomes to tackle the issues of invasive species and biodiversity impacts, particularly in the face of the impacts of climate change.

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<sup>1</sup> Gooding, A 2012, *A Comparative Analysis of Regional Organisations of Councils in NSW and Western Australia*, Australian Centre of Excellence for Local Government, University of Technology Sydney.

## Identification of Priorities

The four main goals of the Plan remain as for the 2007-2015 Plan:

- *Exclude - prevent the establishment of new invasive species;*
- *Eradicate or contain - eliminate, or prevent the spread of new invasive species;*
- *Effectively manage - reduce the impacts of widespread invasive species;*
- *Capacity building - ensure NSW has the ability and commitment to manage invasive species.*

These provide a good overarching structure for the objectives and actions which underpin the Plan, particularly if effective management is targeted towards protection of assets – environmental, economic and social/cultural. Biodiversity and climate change interact and change the level of threat posed by invasive species. Yet this reality is not reflected in the Plan, focussed as it is on biosecurity rather than biodiversity. This is of concern to us. SCCG recommends a reference to Australia's Biodiversity Conservation Strategy 2010-2030 in related documents in order to reinstate biodiversity conservation as a target of the plan alongside biosecurity.

## Principles of the Plan

The Principles of the Plan remain substantively unchanged.

## Roles and Responsibilities

There has been some review of roles and responsibilities due to the re-structuring and abolition of various departments and bodies. The inclusions of a table seeking to capture the roles and responsibilities is helpful. SCCG recommends the inclusion of greater guidance on opportunities and mechanisms for collaboration to enhance this section. Good examples of effective collaborative invasive species management include the Urban Feral Animals Action Group and the Sydney North Regional Weeds Committee.

Some statements in the Plan (such as "it is hoped" in relation to pest species *Tilapia*) are vague. SCCG recommends the use of SMART syntax and explicit details generally, and in particular around collaboration and coordination across local, state and national agencies.

The greatest responsibility for implementation would seem to fall on the NSW Department of Primary Industries (DPI) and concerns must be raised about the resource allocations which coincide with that. It is pleasing to see the introduction of an explicit role for community but SCCG recommends implementation be backed by more effective community education and engagement campaigns so that members of the public can be better informed as to their role as the "eyes and ears". The community needs to be supported and resourced to contribute their local knowledge to weed and invasive animal detection, eradication, containment and management.

Additionally SCCG recommends the Plan include revision of DPI Pest Management Guidelines to more specifically recognise urban pest management to help improve both the efficiency and effectiveness of pest programs in urban areas.

## Challenges, Goals and Actions

SCCG commends much of what is contained in the Goals, Objectives and Actions section of the Plan. Of particular note are: use of a risk-based approach grounded in sound science; recognition of the importance of enhanced (rather than merely maintained) surveillance and early detection, both by agencies and the wider community, and; the importance of private landholder motivation.

This draft Plan does not seem to build on the achievements of the previous. It is disappointing to see the same or similar objectives, actions and outcomes/outputs to those which featured in the previous seven-year plan. We understand the need for these to be broad and some are naturally ongoing. SCCG recommends some outcomes, such as those involving industry or state codes of practice and protocols, be developed and then revised as required. There is a real risk that the Plan is simply aiming towards the same outcomes over the long-term, rather than reinvigorating the Plan to incorporate new actions/outcomes based on the latest knowledge, research, technologies and on-ground management techniques.

SCCG recommends a proactive approach to dealing with potential effects of climate change be incorporated. Making use of models of spread to better target monitoring along likely invasion fronts is one example, though again adequate resourcing needs to be available for such suggestions.

Given recognition of the need for increased collaboration across all sectors in order to implement successful prevention and management of invasive species, SCCG recommends that the Plan explicitly align with both the Intergovernmental Agreement on Biosecurity, and strategies derived from it, and the Australian Biodiversity Conservation Strategy – both of which have been introduced since the previous NSW Invasive Species Plan was adopted.

In order for the Plan to be effective there needs to be a greater emphasis on implementation targets that are specific, realistic and measurable, with solid timeframes. The where and how of regional collaboration needs to be stipulated to address the issue of consistent invasive species management across LGA and state/federal government boundaries. It is also extremely important that adequate resourcing be identified and applied to actions within the Plan upfront, clearly indicating where resources will be sourced from. Whilst we support this Plan and the need for action, there is a real concern regarding the potential for cost shifting from state government to local councils, which would apply further pressure on local councils and local communities in terms of financial and staff resourcing.

Finally, given the charter of the Sydney Coastal Councils Group, we note that while the Plan acknowledges the impacts not only on terrestrial, freshwater and marine species, the overall emphasis of the Plan appears to be on terrestrial species, with marine species receiving little or no overt attention.

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