

**To: Office of the Chief Environmental Biosecurity Officer**

**From: The Australian Network for Plant Conservation Inc. (ANPC)**

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**ANPC submission on the *Priority list of exotic environmental pests and diseases*, 30 Sept. 2019.**

Thank you for the opportunity to comment on the Priority List of Exotic Environmental Pests and Diseases.

We note that the need for such a list was included in recommendations of the 2017 review of the capacity of the national biosecurity system (Craik et al., 2017:

<http://www.agriculture.gov.au/biosecurity/partnerships/nbc/intergovernmental-agreement-on-biosecurity/igabreview#final-report>). That review recognised the dangerously neglected environmental side of Australia's past biosecurity arrangements and investment.

We welcome this Priority List as one step in the implementation of the numerous recommendations of that Review that relate to redressing the balance of attention and resourcing of environmental biosecurity.

In that Review, development of a list of some of the most serious broad-spectrum environmental threats that have not yet arrived in Australia, was recommended as a *first step* towards improved prevention-of-arrival biosecurity and preparedness if they do arrive. The Craik Review also recommended development of **action plans** for these organisms – mechanisms for this next step have not yet been announced by the Department of Agriculture (DA) or the Office of the Australian Chief Environmental Biosecurity Officer (ACEBO).

One of the overarching recommendations of the Craik Review was that the environmental sector – government and non-government – needs to be much more involved in biosecurity planning and execution; to date these rest very largely with the primary industry agencies and the agricultural sector. How the Priority List is promulgated, and how the downstream actions from it are resourced and executed, will have a great effect of whether or not that overarching recommendation is realised.

The Interim List relates to the ANPC's work particularly through the categories of *Plant diseases and their pathogens* and *Weeds and freshwater algae*. We do however regard the entire list as important, as biodiversity conservation needs to be approached holistically, and some of the animal pests and diseases are also directly or indirectly relevant to our area of focus (e.g. Asian Gypsy Moth).

**Preliminary comment re process:**

- **We note the short consultation period (1 month).** While often standard for Government consultations, we advise that this is generally too short a period for NGOs (and sometimes agencies) to generate optimal submissions and engage their membership/staff widely in the process (noting that a widening of engagement by the environmental sector is one of the ACEBO's aims). The non-government parts of the environment sector, more than the agricultural sectors that DA is used to, is made up of many NGOs, many of them small, with dispersed memberships, few staff, and a heavy reliance on personal volunteered time. Even the agency component of the environmental sector is, as the Craik Review noted, poorly engaged with biosecurity issues, and in fostering greater engagement by and with these

agencies and NGOs, DA and the ACEBO's Office would be well advised to allow longer (6-8 week) lead times for consultations.

#### Specific comments on the List:

- **We endorse the list overall.**
- **We endorse the content of the *Plant diseases and their pathogens* category:**
  - Ceratocystis wilt (*Ceratocystis manginecans* and other exotic *Ceratocystis* spp.)
  - Exotic strains of myrtle rust (*Austropuccinia psidii*)
  - Polyphagous shot hole borer associated fusarium wilt (*Fusarium euwallaceae*)
  - Ramorum shoot dieback and leaf blight (*Phytophthora ramorum*)
  - Teratosphaeria leaf blight and canker (*Teratosphaeria destructans*, *Teratosphaeria zuluensis*)
  - Xylella (*Xylella fastidiosa*)
- **We endorse the content of the *Weeds and freshwater algae* category:**
  - Didymo (*Didymosphenia geminata* – the Rock Snot diatom, present in New Zealand)
  - Manchurian wild rice (*Zizania latifolia*)
  - Mikania (*Mikania micrantha*)
  - Mouse-ear hawkweed (*Hieracium pilosella*)
  - Spiked pepper (*Piper aduncum*)
  - We endorse the content of the plant diseases and pathogens category.
  - We endorse the content of the weeds and freshwater algae category.
- We note that both the *plant diseases and pathogens* category and the *weeds and freshwater algae* category could have had numerous other high-impact high-arrival risk organisms included, and that only about one quarter of the short-listed taxa were included in the final released list, on the basis that this was more 'bite-sized' for public awareness raising. This is an understandable rationale, but a somewhat artificial one in biological terms. Exotic invasives are unlikely to form an orderly queue for arrival. Some level of background attention and progress is still needed on those that didn't make the final cut.
- We note the supporting document's statement that this Priority List will be a 'living list'. It is important to give this real effect. The unintended but very real fossilisation of the Weeds Of National Significance (WONS) list, and its overuse (now over many years) as the default priority list for a wide range of weed control grant schemes, has arguably masked and retarded the need for urgent action on weeds of high regional or habitat significance, and has resulted in missed opportunities for control or even eradication. The welcome development of the Priority List should not be allowed to similarly mask the importance of narrower-focus environmental threats, and should not over-dominate the communication and education dimensions of the environmental biosecurity space. 'Priority' does not, or should not, imply the exclusion of other organisms of concern, and a nuanced approach in both education and funding is necessary. This will require informed handling, and active advice from the ACEBO to funding agencies that while strong attention to Priority List taxa is desirable, some provision should be retained for research and preparedness work around the other shortlisted organisms, especially where they may serve to more effectively involve parts of the environmental sector. A case in point is the Kauri Dieback pathogen

(*Phytophthora agathidicida*), which is of particular concern for its potential conservation and cultural impacts in Queensland. It would nevertheless be a mistake if all awareness and vigilance work for this pathogen were to be left to the Queensland Government as a State matter, given the role that can be played in precautionary awareness by various actors in other States – including the custodians of the many *Agathis* trees in public and private tenures in centres of high likelihood as points of introduction (metropolitan botanic gardens in the other States being a prime example). The ABARES (2019) Information paper draws brief attention to this issue (p. 5), but simply treats it as ‘out of scope’ for this list – fair enough, but the potential for the List to over-determine the targets set by funding bodies should be regarded as a real issue requiring nuanced attention.

### Key issues once the list is finalised:

What is going to be done about each listed taxon? We see the priorities as:

- *Preparedness Plans* are urgent (action-oriented, not the more in-depth Contingency Plans used in the past – the extra content of these is important, but can be filled in later).
- Preparedness Plans should have an emphasis on examining relevant systems in place, identifying gaps, and filling them (i.e. resourcing remedies).
- Critical questions for each taxon include:
  - What arrival pathway analysis is available?
  - What specific quarantine measures are in place?
  - What pre-arrival monitoring systems are in place in (e.g. sentinel plants for plant pests/diseases).
  - Is there a regional (Indo-Pacific, Australasian) system in place for vigilance and exclusion?
  - What are the eradication and containment options under different arrival scenarios?
  - What human, physical, and administrative resources are developed and in place relevant to each pest? (*Human*: trained individuals in stable positions in each agency, familiarised with the threat and response options and procedures. *Physical*: suitable traps, lures, other detection systems, identified best chemical options for environmental use, draft awareness material. *Administrative*: suitable permits for chemical use, SOPs for response including for non-biosecurity staff and community).
  - We understand that some of the organisms on the Priority List were subjects in a recent round of botanic gardens biosecurity network training. Is something like this envisaged for environmental agencies and groups, utilising MyPestGuide/Reporter software?
- We note that 2020 is the UN’s *International Year of Plant Health* (IYPH), and that this has been endorsed by DA, but so far with no announcement of proposed initiatives, funding, or what level of community NGO involvement is hoped for and how this is to be resourced. The IYPH is an ideal opportunity to drive greater biosecurity awareness and preparedness for some of the organisms on the Priority List, but if increased engagement with and by the environmental sector remains a goal for DA and the ACEBO’s Office, then it needs lead time, consultative decision-making, and resourcing. We draw attention to the high investment levels in New Zealand for comparable activities directed at this goal.
- Regardless of IYPH, there needs to be a program of familiarisation with the final List and the operational implications, involving the environment sector (agencies, community NGOs, and

eco-businesses) and Indigenous land owners/managers. This process should include the identification and negotiation of lines of communication and decision-making for a response (arrival and post-arrival phases) for each of these sub-sectors. This process should be urgently undertaken so it is in place *before* a crisis, not during.

- Trial ‘war games’ are needed for at least some organisms in each category, with stakeholder involvement as in the previous dot-point. We understand that such exercises are conducted for many agricultural pests and diseases, but they have been very rare for potential environmental invasives. We note that recent (2016-18) Xylella workshops had minimal representation from the environment sector. Conscious outreach (and some support) to improve environment sector involvement in such exercises is an indispensable part of securing better engagement.
- Also important is a review of impediments in the environment sector to rapid response and recognition of each new risk (e.g. skills shortfalls in agencies; slow Extinction-risk Listing procedures in most or all jurisdictions; a lack of discretionary emergency funding sources in these agencies for unlisted but at-risk species). Conducting such a review would itself help make environment agencies more aware of their expertise and systems gaps, and the possible remedies.
- Regarding preparedness for post-arrival transition (assuming failed eradication), we would draw particular attention to the disastrous lack of uptake on Myrtle Rust by the environmental agencies, after the initial Ag-led emergency phases of response to Myrtle Rust in 2010-12. The lack of effective handover systems, very slowing assessment regimes for extinction-risk listing, and the resulting ‘dropped ball’ on the environmental impact front, have been the root of the continuing lack of any coordinated environmental response up to the present (2019). (The contrast with the New Zealand situation since Myrtle Rust arrival in 2017 is stark: they have managed an effective, almost seamless transition from the initial Ag-led response to a wider, whole-of-government and well-resourced environmental impact management program.) Many of the organisms on the present Priority List have a similar high potential for rapid spread and wide impact. We see no evidence that there has been any reduction of a similar recurrence – of failure to transition to an effective environmental response – were a comparable situation to arise again. The Priority List should be used to drive changes in agency priorities, culture, and skills formation that will *in fact* reduce that risk into the future.
- Once first-cut Preparedness Plans and rehearsed procedures are in place (and capability gaps are remedied), other elements of the normal slow Contingency Plan process should be developed – published reviews of biology of the organism; more in-depth review of native species and ecosystems and cultural assets likely to be at risk; and appropriate precautionary actions for these (e.g. germplasm capture – before the threat arrives this time, cf. Myrtle Rust!).
- In regard to periodic review of the Priority List, we note that the ABARES (2019) Information Paper states that “the NBC should lead reviews of the national priority lists at least every five years, reporting to [Agriculture Senior Officials Committee] AGSOC and [Agriculture Ministers' Forum] AGMIN”, as per recommendation of the Craik et al. (2017) Review. We suggest that this reporting line contributes *nothing* to closer engagement of the

environmental agencies in biosecurity (a key issue in that review), and that *dual reportage* through both the Agriculture and Environment committee and Ministers Forum streams would be far more appropriate.

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