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### *Feedback on the List of Declared Animals and New and Emerging Introduced Animal Policy*

The Nature Conservation Society of South Australia (NCSSA) welcomes the opportunity to provide feedback on the List of Declared Animals and New and Emerging Introduced Animal Policy. As South Australia's primary nature conservation advocacy organisation, NCSSA has been a long-term advocate for the protection and conservation of native vegetation and biodiversity in South Australia with particular attention to nationally and state listed threatened plants, animals and ecological communities and management of protected areas.

We provide the following feedback on the draft policy:

#### General Comments

The policy provides a good framework for the management of new and emerging introduced animals in South Australia however we suggest that it could be improved through the inclusion of further detail about other related State and National policies that guide biosecurity responses. It could be useful to include a diagram showing the context for the policy and how it aligns with relevant legislation and other biosecurity related strategies and plans.

We strongly recommend the policy acknowledge the impact of climate change on the current and future distribution and abundance of pest animals. There is a substantial amount of published scientific papers and reports that address these matters and the policy should address this issue as a high priority in terms of pest animal control and management.

#### Pest risks of new introduced vertebrates

We support the risk-based approach to assessment of the impact of introduced vertebrates and the application of a precautionary approach where an introduced animal has not yet been assessed. This approach will ensure that a lack of full scientific knowledge does not prevent or delay measures to protect biological diversity or other environmental values.

We recommend this section provide a brief overview of the procedures for developing and implementing management strategies for new pest animal incursions and who is responsible for these processes.

#### Feasibility of Containment

We strongly support the focus on prevention, early detection and eradication in the draft policy as the most cost-effective methods to control of pest species. Although the greatest emphasis should be placed on the early stages of invasion where greater outcomes can be achieved with a given amount of resources (e.g. prevention and rapid incursion response), it is also important to continue striving for ways to effectively reduce the impact of existing invasive species on the environment. We suggest that the policy acknowledge the need for ongoing resources and efforts to control established pest species.

### Monitoring effectiveness

The implementation of management strategies to reduce the number of incursions or number of introduced animals that establish populations is supported however we recommend this section acknowledge the need for adequate resourcing for their implementation.

Although the number of reports, and the number of animals within each of these reports provides useful information about the implementation of the management strategies they are more of a surrogate measure for the effectiveness of management actions. We strongly recommend that the effectiveness of management strategies should also be assessed more directly for example through the time and resources allocated towards undertaking surveillance to detect incursions and responses to incursions.

### Policy statement

We support the statement that “Incursions of new and emerging introduced animals increase the risk that new populations will become established in the wild” however recommend that the 2<sup>nd</sup> sentence is reworded i.e. Management strategies will be implemented that outline a plan to reduce this risk.

### Implementation of management actions for new and emerging introduced animals

We strongly support the need for coordinated action from all stakeholders in preventing and managing incursions of new and emerging introduced animals with Biosecurity SA and regional NRM Boards taking a lead role in oversight of programs and activities. We also support the intention for landholders, industry and community groups, and individuals who hold permits to keep introduced animals being actively involved and sharing responsibility for activities to prevent new incursions of introduced animals and assistance with early detection responses.

### Declarations for new and emerging introduced animals

We suggest that it might be useful to have two separate sections within Class 1, one that includes introduced animals of high invasive potential that do not currently occur here and could potentially readily establish e.g. Barbary Doves, and another that includes all other introduced animals not listed in any other class.

We also suggest that this section acknowledge that the South Australian Government is a signatory to the Intergovernmental Agreement on Biosecurity that provides a coordinated national approach to the funding of and response to exotic pest and disease incursions.

### Review of the policy

We support the proposal to review the policy by 2023 or in the event of a change in one or more regional management plans for introduced animals. We suggest that it would be useful to specify who will undertake the review and publish the findings on PIRSA’s website in order to contribute to improved transparency in South Australia’s biosecurity system.

We trust that our feedback will be duly considered and of assistance in finalising these documents. 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](mailto:nicki.depreu@ncssa.asn.au)

Yours sincerely,



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