



## **ENVIRONMENTAL DEFENDERS OFFICE (QLD) INC.**

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Mr Bruce James  
Department of Primary Industries and Fisheries  
Queensland Biosecurity Strategy Project Team  
GO Box 46, Brisbane 4001 QLD  
By email: [bruce.james@dpi.qld.gov.au](mailto:bruce.james@dpi.qld.gov.au)

Dear Mr James,

### **EDO Qld comments on Biosecurity Discussion Paper**

Please find below the brief submission of the Environmental Defenders Office Qld (“EDO Qld”) on the Queensland Biosecurity Discussion Paper.

The EDO Qld is a public interest environmental and planning law community legal centre. The primary goal of the EDO Qld is to protect and enhance the environment in the public interest through use of the law, by and on behalf of the community. EDO Qld is active in law reform and we welcome the opportunity to comment on this important Discussion Paper.

#### **General comments**

EDO Qld supports the development of a statewide framework for managing biosecurity risks and responses, with the aim of protecting the environment, human health and the economy.

However, we believe there is insufficient prioritisation in the Discussion Paper of the threats to the natural environment - especially to biodiversity - from potentially harmful pest, diseases and contaminants. We note that threats from pests and diseases will only increase with climate change yet the Paper does not propose any strategies for mitigation or adaptation to climate change, nor does it propose any linkages to existing government climate change policies.

It is crucial that the proposed Biodiversity Strategy is reflected in legislation and that existing weed and pest legislative provisions are reviewed, improved and integrated into new legislation which provides for public participation and enforcement. Appropriate resourcing for implementation of the Strategy will also be vital to its success.

Our specific comments on points requested by the Discussion Paper are set out below.

#### **Comments on proposed Vision, Outcomes and Principles**

The Vision statement as currently worded measures the level of public confidence in our biosecurity response, rather than the actual on-ground adequacy of the response. This misplaced emphasis would fail to measure the effectiveness of the Strategy in protecting the state from biosecurity threats, since public confidence could be engendered by a mere advertising campaign, without adequate on-ground measures. The Vision statement should also make specific reference to the environment, without which there would be no human health or economy (similarly the diagram showing the environment as a separate concern should be amended to depict health and

economy sitting within the environment). EDO Qld submits that the Vision statement would be more meaningful if it read “Queensland’s environment and our way of life are adequately protected from the negative impacts of pests, diseases and contaminants”.

Adaptation to, preparation for and management of the increased risk of biosecurity threats from climate change should be included as an Outcome. This should also be reflected in the Risk management approach Principle.

Building the resilience of the natural environment should be an Outcome. Resilient natural areas are better able to withstand weed and pest invasions, and therefore building resilience in those areas by reducing existing threats (such as land degradation and poor land management) helps reduce the risk posed by biosecurity threats. This should be reflected in the Prevention Principle.

### **Comments on proposed Key Issues and Actions**

Regarding Key Issue 1 Sharing Leadership, we note that landholders will be key allies in the fight against new weeds and pests, and need to be resourced in order to prevent or quickly report and respond to a new threat. We support building Biosecurity Queensland’s capacity so that it can provide outreach services to landholders. However we are cautious of proposals to inflate the role of industry stakeholders in the policy development process, particularly since there is the possibility of conflict between the private interest of industry and the public interest of the environment.

Regarding Key Issue 2 Justifying and Prioritising Investment, the EDO Qld supports high government investment in both prevention and response to biosecurity threats, particularly in relation to threats to biodiversity and the natural environment from weeds and pests. Any increased private investment should not be used as a premise to reduce overall funding. The statement that there is a need to determine whether there should be any government investment in a particular biosecurity issue should be answered by applying the precautionary principle.

Regarding Key Issue 3 Taking a Strategic Approach to the Science, the EDO Qld strongly supports building social science capacity, as environmental threats from biosecurity are influenced by the behaviour of land managers.

Regarding Key Issue 4 Focussing on the Tropics, the EDO Qld supports the proposed focus on biosecurity threats to the tropical north, as much of this area is pristine and needs protection from weeds and pests.

Regarding Key Issue 5 Improving Emergency Response, the EDO Qld supports investment in a formal integrated structure with resourcing dedicated to developing and maintaining readily deployed infrastructure, staff and systems necessary to underpin an effective biosecurity emergency response capability. However, a focus on preventative measures is vital and needs to be prioritised and should certainly be its own Key Issue. Ongoing collaboration between government, industry and community on biosecurity is strongly supported. Well resourced community engagement through education and training is critical to emergency response, threat containment and recovery.

Regarding Key Issue 6 Improving Surveillance, the EDO Qld agrees that modern biosecurity surveillance systems require more focus on social and environmental impacts rather than just being driven by economic needs. Cooperation between all levels of government and community and industry engagement is crucial.

Regarding Key Issue 7 Management of Established Pests, Diseases and Contaminants, the EDO Qld believes that this is the highest priority Key Issue along with Key Issue 11. The Paper cites AusBIOSEC as saying weeds cost \$4 billion in production losses but the impacts on the environment and biodiversity are largely incalculable – though they are likely to be comparable and possibly higher. There is an urgent need to protect our national parks from the spread of weeds and our native wildlife from invasive pests. The current legal, policy and funding frameworks around

weed and pest management are disparate and long overdue for updating. We strongly support their review and modernising through better integration with the Biosecurity Strategy backed up with legislative provisions.

Regarding Key Issue 8 Achieving Active Participation in Biosecurity, the EDO Qld strongly supports a proactive community education, awareness and engagement campaign for the reasons set out in the Paper. As mentioned above, we strongly support the development of contemporary Biosecurity legislation with modern compliance and enforcement provisions, including legislative provision for public participation and enforcement.

Regarding Key Issue 9 Enhanced Service Delivery, the EDO Qld supports better integration and shared service delivery with NRM bodies, which are well established in the community and enjoy the support of most landholders.

Regarding Key Issue 10 Building Capability, the EDO Qld supports expanding outreach into the peri-urban sector and improving capacity to manage modern biosecurity issues, including by specialist employment and training programs.

Regarding Key Issue 11 Identifying the Gaps, the EDO Qld believes that this is the highest priority Key Issue along with Key Issue 7. The Paper notes that most pests and diseases are managed for their economic impacts but that we must start to consider the range of social or environmental pests and their impacts, and EDO Qld strongly agrees. This is all the more urgent given that climate change will result in greater weed and pest invasions as well as the spread of diseases, a point surprisingly absent from the Paper. We strongly support the three Actions proposed:

- Identifying, quantifying and prioritising current and potential threats;
- Incorporating environmental biosecurity into environmental management plans and biodiversity strategies;
- Recognising the need for greater emphasis on investment in prevention due to difficulty in detecting and treating many environmental pests and diseases.

*Recommended additional Key Issues*

Building the resilience of the natural environment should be a Key Issue with associated Actions, as well as an Outcome and a Prevention Principle for the reasons suggested above.

Preventative measures should be a Key Issue, with associated Actions. There is laudable focus on emergency response but this needs to be balanced by proactive preventative measures to reduce the need for emergency responses.

**Comments on proposed Measurement of Success**

Assessment of the success, and review and improvement where shortcomings are identified, is a necessary part of any regulatory system. Public comment on the success of the Strategy and suggestions for improvement should be sought.

Please do not hesitate to contact EDO Qld to discuss any aspect of this submission.

Yours faithfully  
Environmental Defenders Office (Qld) Inc.



Larissa Waters  
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