

31 October 2018

Via email

**Re: Overabundant and Pest Species Inquiry**

The Environmental Defenders Office (SA) Inc (“the EDO”) is an independent community legal centre with over twenty five years of experience specialising in environmental and planning law. EDO functions include legal advice and representation, law reform and policy work and community legal education. The EDO appreciates the opportunity to provide a response to the Natural Resources Committee’s call for submissions in relation to the management of overabundant and pest species in South Australia.

The current management framework is a combination of legislation and policy primarily under the Natural Resources Management Act 2004 (SA). Generally the responsibility of dealing with pest species on private land lies with the landowner. However, increasingly, many pests are released or escape and find ‘resort’ style habitats which increase their numbers. It is crucial that processes are put in place to minimise these threats to biodiversity and increased cooperation amongst stakeholders is vital.

At the outset we make the point that base-line data is critically important in developing effective management plans, for example, there needs to be detailed scientific studies of the environmental effects of feral deer. A 2010 policy report on feral deer states that unless both recreational hunters and farmers are made aware and accept the potential economic and environmental costs, the liberation of deer into the wild is likely to continue.

In general we support the retention of most of the current provisions for pest plants and animal control with improvements to be informed through the engagement process. We support the use of legislation to help eliminate or minimise the impact of pest plants and animals. The current provisions have created a unified approach to managing pest and weed populations across boundaries.

The proposed focus on pest plants and animals in the new SA Landscape legislation puts forward some proposals that we believe will help in the effective management of pest species. We support the assertion that there needs to be a whole of landscape approach to pest species and that separate regional plans will not adequately deal with this issue. Consequently we recommend that the new landscape boards plan to minimise the habitats that foster pest species and cooperate with neighbouring boards to minimise favourable habitat.

For example, feral fallow deer seem to increase in forestry plantations and fallow deer increase at the interface between native vegetation and cleared agricultural land. The deer problem is exacerbated by the lack of effective fencing due to the excessive cost of this fencing. Levies need to be targeted to ensure an unreasonable burden is not placed on particular landowners. There needs to be a partnership approach between Landscape Boards, government, community and industry in order to detect and respond to new incursions and for landscape scale management of established pests.

One area where change could be made is in the area of compliance. Enforcement of penalties in relation to declared pest plants and animal control needs be consistent. Penalties should encourage compliance and be proportional to the biosecurity impacts or risks posed by pest plants and animals. Compliance would be strengthened if authorised officers could prescribe specific control activities (for example specifically requiring landholders to bait to control wild dogs) and have the ability to directly undertake control activities and recover costs where there is high risk impact.

Please advise if you require clarification on any of the issues raised in this submission.

Yours sincerely

A handwritten signature in blue ink that reads "M Ballantyne". The signature is written in a cursive style and is positioned above the printed name.

Melissa Ballantyne

Coordinator/Solicitor

Environmental Defenders Office (SA) Inc.