



Submission to:

Review of the Declared Pests of Western Australia
Intergovernmental Agreement on Biosecurity
Department of Agriculture and Food WA

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Prepared by: Kim Haywood & Maddison McNeil
Organisation: The Western Australian Farmers Federation (Inc.)
President: Mr Tony York
Address: 125 James Street
Guildford WA 6055
Postal Address: PO Box 68
Guildford WA 6935
Phone: (08) 9486 2100
Contact Name: Kim Haywood
Title: Executive Officer
Email: kimhaywood@wafarmers.org.au

Background

The Western Australian Farmers Federation Inc. (WAFarmers) is the State's largest and most influential rural advocacy and service organisation. Founded in 1912, WAFarmers boasts a membership of over 3,300 farmers including grain growers, meat and wool producers, horticulturalists, dairy farmers, commercial egg producers and beekeepers. Additionally, through differing forms of land tenure, our members own, control and capably manage many millions of hectares of the State's land mass and as such are responsible for maintaining the productive capacity and environmental wellbeing of that land and the animals that graze it.

WAFarmers welcomes the opportunity to submit a response to this important review process and we would like to offer the following comments for consideration.

Introduction

As a member of the Stakeholder Reference Group, we were keen to fulfil our obligations by providing feedback to each of the 137 declared pest briefing papers. However, we underestimated the complexities and the time need to complete this task professionally in the timeframes required and this has raised a number of concerns given the subject matter being reviewed. With the delegation of some responsibilities from DAFWA to industry stakeholders as a consequence of resource cutting measures, WAFarmers suggests consideration could have been given to providing funding support to industry stakeholders to allow them to employ a suitable university graduate on a temporary basis to complete this task in a more efficient manner.

Discussion and Comments

1. The first issue we had with the review was the confusing and at times contradictory definitions used to define category definitions for each organism. For example, a prohibited organism can be assigned an exempt keeping category, which in the practical sense, seems illogical. The confusing use of category definitions was highlighted at the first meeting of the reference group.
2. Coupled with the above complexities, was the requirement to complete a comprehensive feedback form for each declared pest, which industry representatives found over-burdensome and time consuming. We strongly believe this complex structure could be modified to improve understanding and efficiencies.
3. WAFarmers seeks assurance that if the current list of declared species is reduced to meet resourcing priorities, will government put more effort into managing and controlling those declared pests remaining on the list. Industry needs assurances that if we support the proposed recommended changes, this will result in improved and well-funded control and management programs on the ground.
4. We also recognised that some important pests were not included on the list. For example feral cats spread disease to humans, particularly pregnant women, yet they are not included on the declared pest list. The industry seeks clarification on how it goes about getting pests put back on the declared pest list. Is there a process for this? Further clarification is also needed on what other control options are available to land owners to manage and/or control reclassified pests, particularly if populations within an area increase. For example, can land owners apply to DPAW for control permits? Many landholders questioned why native animals are included on the declared pest list.
5. There is still confusion in the industry as to what it actually means if a declared species like a starling, moves from a control category C1 and/or C2 to a prohibited keeping

category. What does this actually mean? For example, if a pest is excluded or needs to be eradicated, how does the management practice change if the pest is reclassified to a prohibited category under permit, and what are the land owners' legal obligations?

6. Another example highlighting the confusing aspects of this review, is a declared pest under s22 (C1) like the Rusa Deer is reclassified to prohibited s12 C1 restricted – surely if it is prohibited (only kept under permit for display and educational purposes etc.) it can't then be restricted (have a low risk of becoming a problem) – this doesn't make sense. If a declared pest is categorised as C1 why do we then allocate a keeping category as 'exempt', if it is C1 it should not be in the state?
7. WAFarmers suggests the legal framework under the BAM Act could be reviewed to streamline processes to remove these abnormalities as noted above.

In principle WAFarmers supports the proposed recommendations, although we do need assurances that this will result in improved management and resources on the ground.

WAFarmers welcomed the opportunity to be involved in this review and looks forward to further discussion on some of the suggestions made above.