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SUBMISSION TO

Victoria's Biosecurity Strategy

Victorian National Parks Association

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Victorian National Parks Association submission to Victoria’s Biosecurity Strategy

Thank you for the opportunity to provide feedback and knowledge into Victoria’s Biosecurity Strategy.

The Victorian National Parks Association (VNPA) is an independent member-based organisation, working to improve protection of Victoria’s biodiversity and natural areas, across land and sea.

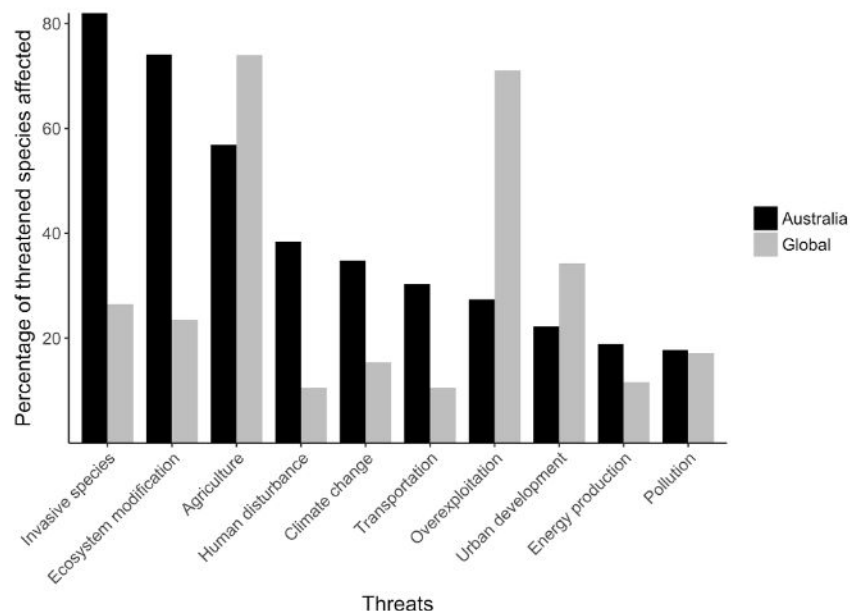
VNPA has been actively working to protect Victoria’s biodiversity for over 70 years, with a long history of advocating for increased management of invasive plant and animal species across all land tenures and highlighting the growing and significant impact invasive species have on Victoria’s unique plantlife and wildlife.

Biodiversity and nature lost in document

Although the document sets out a clear strategy of managing biosecurity risk and sharing responsibilities across all land tenures, the bias towards agricultural language and impacts is disappointing.

Within the Executive Summary, the impact on our parks is highlighted but the impact on native plantlife, wildlife and ecosystems is omitted from the onset of the document. These values exist outside of parks and reserves, across private and public land, and must be clearly identified as values at risk from impact of harm caused by pest plants, animals and diseases.

A recent review of plant and wildlife species listed under Federal legislation as Critically Endangered, Endangered or Vulnerable, found that 82% of listed species are impacted by invasive species¹. This is highlighted again in the graph below.



¹ Kearney Stephen G., Carwardine Josie, Reside April E., Fisher Diana O., Maron Martine, Doherty Tim S., Legge Sarah, Silcock Jennifer, Woinarski John C. Z., Garnett Stephen T., Wintle Brendan A., Watson James E. M. (2019) The threats to Australia’s imperilled species and implications for a national conservation response. Pacific Conservation Biology 25, 231-244. <https://doi.org/10.1071/PC18024>

Decline in biodiversity in Victoria impacts not just the plantlife, wildlife and ecosystems that call Victoria home, but also the future health and wellbeing of all Victorians, current and future.

This is highlighted with Victoria's statewide biodiversity plan *Protecting Victoria's Environment – Biodiversity 2037*, published in 2017. As stated within the document by the Environment Minister Lily D'Ambrosio:

Our natural environment is not only beautiful, it is fundamental to the health and wellbeing of every Victorian. It provides clean air and water, productive soils, natural pest control, pollination, flood mitigation and carbon sequestration – and supports productive activities that underpin our state's liveability and economic advantage.

Tourism spending alone associated with national parks and reserves is estimated at approximately \$1.4 billion annually, and visits to national parks are estimated to deliver health benefits that save the state between \$80 million and \$200 million per year through the avoidance of disease.

National parks are estimated to save the Victorian Government a further \$46 million per year on avoided infrastructure costs from flooding, and through water purification which saves approximately \$33 million annually in metropolitan areas and \$50 million a year in non-metro areas².

There is a strong need to recognise these values within the proposed future of Victoria's biosecurity strategy and future Biosecurity Act.

Vision for the future of Victoria's biosecurity system, biodiversity needs to highlighted

The vision as a whole is ok, but there is a need for a specific line on the biodiversity values and how they are impacted and valued, much like the line on food and fibre.

The level of impact of pest plants and animals on native biodiversity is not reflected in the current vision – this must be rectified.

Below we have given a possible example for inclusion into the Vision:

Where Victoria's native plant, wildlife and ecosystems on both land and sea are able to follow their evolutionary development and function unimpeded by invasive plants, animals, pathogens and diseases.

Biosecurity Reference Group (BRG)

The current Biosecurity Reference Group (BRG) is heavily weighted toward agriculture and production interests, with only two environment groups out of the 13 people on the group. Also, one of these two groups are aligned with an agricultural organisation already represented in the group.

There is a need for additional conservation-minded representatives in the reference group, with experience not only in the impacts of invasive species on local biodiversity but also the legislative requirements and interactions around threatened species recovery and

² Protecting Victoria's Environment –Biodiversity 2037, The State of Victoria, Department of Environment, Land, Water and Planning (2017). Page 5

management, and how that can add to the strengthening of biosecurity systems across the state to protect these values.

VNPA is disappointed that conservation voices are not being heard within the reference group . This further highlights the lack of acknowledgement of impacts on biodiversity within the consultation and planning around the biosecurity strategy and new Biosecurity Act.

Groups that could been included in the BRG are: Trust for Nature, Invasive Species Council, Biodiversity Council, Environment Victoria and ourselves at the Victorian National Parks Association (VNPA).

The members of the Biosecurity Interagency Committee (BIC) must also be made public and minutes of meetings open to ensure transparency of planning processes towards a new Biosecurity Act.

Sharing responsibility, but maintain accountability

In the list of priority actions we are concerned and disappointed that *“Improve the compliance and enforcement toolkit of regulatory and non-regulatory approaches to incentivise good biosecurity practices and better deter non-compliant behaviours”* rates as low as it is. This is currently the issue that is lacking the most across all land tenures in the state, and leading to the uncontrolled spread of pest plants animals across Victoria.

We understand compliance is undertaken by Agriculture Victoria officers, and we believe this may add a bias towards not just listing of pest animal and weed species that impact on native species and ecosystems, but also the compliance of land holders and managers when these values are being impacted, instead of agricultural production. This is understandable, as this does require specialist ecological knowledge. This could be rectified by increasing the amount of compliance officers and empowering bodies such as the Office of the Conservation Regulator (OCR) to also issue warnings and penalties for non-compliance with legislation.

The need to educate and empower industry and community leaders must be built off more than just championing and advocacy. It must be imbedded with the laws and regulations, added with compliance of these regulations to deter non-compliance and strengthen outcomes and responses.

Increased collaboration and coordination is always welcome and helps build capability and community ownership of programs and operations, but this must be more than matched by government to maintain and coordinate programs and operations by decreasing bureaucratic headaches for community and groups and organisations that are largely volunteer-based.

Marine biosecurity

Marine biosecurity issues should be addressed as part of this strategy. Currently, there are a range of marine biosecurity which are managed by different agencies. For example, Parks Victoria manage marine pests within marine national parks and sanctuaries, and Fisheries manage the Abalone virus. There needs to be some overarching strategy that covers it all, such as this plan.

Marine pests are largely managed, controlled and monitored by Parks Victoria in the marine national parks and sanctuaries, however these only make up a small portion of Victoria's coastal waters – 5.3%. The rest of the state doesn't have a strategy that coordinates other areas outside of parks.