



National Biosecurity Committee
Department of Agriculture, Water and the Environment
CANBERRA, ACT 2601
By email: nationalbiosecuritystrategy@awe.gov.au

18 March 2022

Dear National Biosecurity Committee and Project Team,

RE: Submission to National Biosecurity Strategy consultation draft

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission to the Federal Government's National Biosecurity Strategy consultation draft.

As with ALCA's initial guidance on the direction of the Strategy, **ALCA wishes to restate the crucial importance of elevating environmental protection as a key strategic biosecurity consideration on par with protecting our communities and economy**, noting that these priorities are inextricably interdependent; as well as reinforcing **the opportunity presented to Government in harnessing environmental land managers as crucial partners in delivering any biosecurity strategy**, especially where it relates to invasive species.

Please note that ALCA is happy for this submission to be published in full.

About the Australian Land Conservation Alliance

ALCA represents Australia's leading land restoration and conservation organisations working with landholders on privately owned and managed land across Australia. Together, ALCA's members represent a substantial and growing voice in Australia's land management sector. Our eleven members are:

- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Bush Heritage Australia
- Greening Australia
- Landcare Australia
- Nature Foundation
- Queensland Trust for Nature
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)

ALCA land conservation efforts stretch across over 3 million square kilometres with more than 3,000 landholders. We have over 50,000 supporters and our combined annual turnover exceeds \$200 million. Together we work to support some of the most pressing conservation issues across the country – including invasive species and managing national environmental biosecurity threats, restoring endangered ecosystems, mitigating the impacts of climate change, and building the protected area estate.

Through their active land management, ALCA member organisations are deeply embedded in regional communities and economies, providing jobs, securing significant regional investment, and

safeguarding remaining native habitat for the local community with its many positive spillover effects for agriculture.

Some ALCA members are statutory entities; the views expressed in this submission do not necessarily represent the views of the Government administering those statutory entities.

Recommendations

ALCA's recommendations to initial consultation to the Strategy have been restated below, with additional commentary regarding whether they have been appropriately and adequately addressed in the current draft Strategy.

However, to summarise the most critical recommendations:

- **The environment needs to be re-elevated in the final Strategy to have an equal standing with the economy and communities – as it was in the National Biosecurity Statement and Intergovernmental Agreement on Biosecurity. This is a highly salient omission.**
- **The role of environmental groups – especially private land conservation organisations, given their central role in land management – should not only be more prominent, but their potential as delivery partners in community engagement, data-sharing, and direct assistance in implementing biosecurity control efforts (such as invasive species management or eradication) should be explicitly recognised.**

Elevating the importance of the environment

1. The Strategy should clearly articulate the deep, inextricable, and interdependent interconnection between managing biosecurity threats to safeguard our Australian environment and the management of biosecurity threats to safeguard our communities and economy. **Crucially, communities and the economy cannot be protected without protecting our environment.** Protecting our environment should be afforded the same standing in the Strategy as protecting our community and economy.

Additional commentary: Despite occasional positive language relating to the environment, ALCA notes that **environmental concerns have not been given equal standing in the Strategy's narrative, despite the prominence of the environment in the National Biosecurity Statement, and the equal standing given to the environment in the 2019 Intergovernmental Agreement on Biosecurity.**

2. **Protecting the Australian environment is a critically important national objective**, and this objective should be clearly stated in the Strategy.

Additional commentary: ALCA notes that the environment has been included in the Shared Purpose in the draft Strategy.

3. **The Strategy must consider the entire length of the invasion curve** – whilst prevention is clearly the best approach for emerging threats, there must be approaches developed for eradication, containment and long-term management of pests, diseases, and weeds.

Additional commentary: There is no clear indication that this has been considered or incorporated into the draft Strategy; there should be explicit references to prevention, eradication, and containment as necessary components to a properly holistic national biosecurity strategy.

4. **The Strategy needs to facilitate community buy-in and support** for biosecurity action, including from the private land conservation sector.

Additional commentary: This has been partially addressed in the draft Strategy. ALCA encourages an explicit reference to private land conservation organisations given their central role in land management.

5. In devising the Strategy, the value to national biosecurity from supporting existing private conservation landholders should be considered, as should its expansion. Private land conservation organisations and the landholders with which they engage are critical to national biosecurity outcomes.

Additional commentary: This has not been addressed in the draft Strategy. Given their central role in land management, at least the *consideration of* support for private land conservation organisations to contribute to national biosecurity outcomes should be explicitly stated.

Opportunities to leverage private land conservation organisations

6. **Private land conservation organisations are key stakeholders in our national biosecurity and should be routinely engaged** in the implementation and evolution of the Strategy.

Additional commentary: ALCA welcomes the references to environmental groups within the Appendix of the draft Strategy; however, private land conservation organisations should be explicitly referenced given their central role in land management.

7. The Strategy should recognise the **unique opportunity that private land conservation organisations provide as an avenue of community engagement**, with ALCA members being able to reach many thousands of landholders across over 3 million square kilometres of the Australian landmass. However, these organisations would require support to facilitate community engagement on biosecurity issues.

Additional commentary: As above, ALCA welcomes the references to environmental groups within the Appendix of the draft Strategy; however, private land conservation organisations should be explicitly recognised as a key avenue for community engagement given their central role in land management and unique community role.

Data transparency and availability

8. **Increased data transparency and availability is crucial to improving biosecurity outcomes;** the Strategy will need to outline how this will be achieved.

Additional commentary: ALCA welcomes the references to data sharing and accessibility, especially on page 9 of the draft Strategy where it states: “*Actively share data and research widely*” and “*Enhance the accessibility and use of surveillance and interception data*”.

9. Private land conservation organisations (including ALCA members) are experienced in data collection, methodologies, and handling. They often lead collaborations in right-way science approaches, as well as recognising rights and opportunities for Aboriginal and Torres Strait Island community leadership and collaboration in land management, conservation, science, and knowledge that are relevant to the Strategy. **With appropriate support, private land conservation organisations are well-placed to contribute to Government biosecurity datasets.**

Additional commentary: ALCA welcomes the language in the Appendix, although encourages an explicit reference to private land conservation organisations given their central role in land management.

Research

10. **The Strategy should consider national biosecurity research investment priorities**, including the feasibility of high-tech control technologies for invasive species, such as – for example – gene drive.

Additional commentary: This appears to have been addressed in the draft Strategy.

Resourcing and cooperation

11. The Strategy will need to address funding arrangements, resourcing, and inter-governmental cooperation.

Additional commentary: This appears to have been addressed in the draft Strategy.

Thank you again for the opportunity to provide input to the Federal Government's consultation on the draft National Biosecurity Strategy. ALCA looks forward to an ongoing engagement with Government to ensure that environmental biosecurity issues are afforded the much-needed prominence relative to their national importance in safeguarding Australia's future social and economic prosperity. This includes involvement in the development of actions plans with clear timelines.

Australian Land Conservation Alliance