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Project Manager
TWWHA Biosecurity Strategy

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Comment on [draft] TWWHA Biosecurity Strategy 2021-2031

The Tasmanian National Parks Association (the TNPA) welcomes the development of a Biosecurity Strategy for the TWWHA. We hope that it will direct some much needed attention and resources onto biosecurity, which has been seriously neglected in recent years. A strategy, no matter how comprehensive, is of very limited use without adequate resources for implementation of all its research, education and compliance components.

The TNPA is generally supportive of the measures proposed in the draft strategy, particularly the emphasis on proactive management and the overarching theme that 'prevention is better than cure'. This is particularly welcome given the emphasis in the 2016 TWWHA Management Plan on the reactive use of Biosecurity Overlays to impose restrictions in order to manage threats.

The most obvious recent practical display of concern about biosecurity in the TWWHA has been the installation of boot wash-down stations and it is already apparent that some of these are not being maintained. Neither is it apparent if there is any monitoring of their effectiveness, both in stopping the spread of *Phytophthora* and in raising public awareness about biosecurity more generally. This suggests that biosecurity needs to be much better integrated into day-to-day management of the TWWHA than has occurred in this case.

We appreciate that this strategy relates to the TWWHA but some of the most serious biosecurity risks are most effectively controlled at state or national borders. For example, if didymo gets established anywhere in Tasmania, it will be effectively impossible to stop its spread into the TWWHA. The most effective measure to protect the TWWHA from a particular threat might be increased scrutiny of overseas arrivals at international airports. To be effective, the Biosecurity Strategy for the TWWHA needs a close and clearly defined relationship with the equivalent strategies at state and national level, and for these strategies to work effectively

We make the following comments on specific sections of the draft TWWHA Biosecurity Strategy:

Research, monitoring and reporting

The draft strategy acknowledges that much of the data on the distribution and abundance of invasive organisms (and, hence, the corresponding risk assessments) are years out of date and, in many cases, do not exist. There is an obvious need for current distribution data and other fundamental research in order to better understand the risks. The actions under Goal 2 (p. 29-30) probably aim to address this but we consider the urgency of achieving this goal should be enhanced. Invasive species which are already present in the TWWHA and appear to TNPA to be of particular concern include deer and lyrebirds.

Tasmania is currently seeking feedback on the draft Biosecurity (SDN-1 Modified Organism) Regulations 2020. There is an assumption that SDN-1 modified organisms 'pose the same risk as, and

are indistinguishable from, organisms carrying naturally occurring genetic changes' (Background statement in SDN-1 Fact Sheet). Reporting and monitoring of biosecurity threats has been identified as a systemic issue for World Heritage areas (Shackleton *et al* 2020) and external evaluation of the efficacy of Goal 2 could be enhanced by adopting the reporting and monitoring framework suggested by Shackleton *et al*. This would also facilitate comparisons with other world heritage sites.

The Strategy reads as a description of a strategy, rather than as the strategy itself. For example, 'the management of invasive organisms needs to consider the likelihood of achieving effective outcomes and to direct efforts where the greatest gains can be made' (page 21). Surely this should read 'the management of invasive organisms will consider ...'

Guiding principles

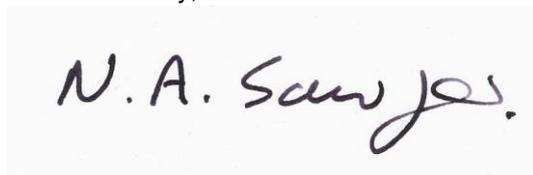
We support the seven key principles listed on pages 12-13 but surely principle 1 (Protect the natural and cultural values of the TWWHA) is better considered as the overarching objective, the remaining six being the 'guiding principles'.

The TNPA particularly supports Action 5.1 (p. 34-35), the delivery of biosecurity educational materials, particularly in relation to hygiene procedures for recreational users. Very little such information is provided by PWS at present. For example, many backcountry users appear unaware of the need for even the most basic hygiene procedures such as those described in <https://www.nrmsouth.org.au/biosecurity/>. Like other information about the TWWHA, this also needs to be presented in languages other than English.

Goal 7: compliance

The TNPA supports the actions and pathways to achieve this goal (p.37-38). We strongly support employment of additional compliance officers. While incorporating biosecurity into existing roles is essential, recruitment of specialist compliance officers is also necessary. We strongly recommend that the *National Parks and Reserves Management Regulations 2019* are changed to allow for significant financial penalties to be applied to anyone, including commercial operators, who fails to demonstrate compliance with the statutory General Biosecurity Duty (GBD) of the *Biosecurity Act, 2019*.

Yours sincerely,



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Reference:

Shackleton *et al.*, 2020. Biological invasions in World Heritage Sites: Current status and a proposed monitoring and reporting framework. *Biodiversity and Conservation* 29:3327–3347
<https://doi.org/10.1007/s10531-020-02026-1>