NEWP framework feedback template

Module 1 - Summary of draft NEWP framework

Does the vision statement adequately explain what the NEWP framework is setting out to achieve?

Current NEWP vision:

"Industry, community and government stakeholders routinely collaborate to better manage established weed priorities at all levels. Stakeholders share a goal to strategically, practically and sustainably prevent the spread and reduce the economic, environmental and social impacts of established weeds."

(The vision for established weed priorities provided in the AWS. *'Protect Australia's economic, environmental and social assets from the impact of weeds.* The purpose of the framework is stated in the aim *'a revitalised, long term, strategic approach to reducing the spread and impacts of established weeds across Australia.)'*

Issue
Stakeholder description *'Industry, community and government'* - raises questions about categorisation of some stakeholders for example - where do non-government organisations fit?

Solution
Replace the stakeholder description with the term '*stakeholders*'

Issue
'…routinely collaborate to better manage established weed priorities at all levels'
Vision should look to the impact that governance arrangement are trying to achieve, not the arrangements themselves, as these may change as a result of ongoing evaluation (e.g. it may be found that collaboration is not effective (it may not result in all stakeholders following appropriate and transparent decision making processes or protect the interests of all stakeholders)). Moreover, routine collaboration is just one aspect of weed management - stakeholders will also be required to respect and engage in alternative processes for decision making and conflict resolution such as referral to authoritative bodies (e.g. EIC, NBC), delegation (e.g. to group vote) etc and compliance with legal obligations.
I would like to see an independent audit of how well collaborative efforts have worked to established weed outcomes before an overly collaborative approach is doubled down upon.

Solution
Replace *'routinely collaborate to better manage established weed priorities at all levels'* with *'fairly and effectively manage establish priority weeds at all levels and meet regulatory requirements for weed control and protection of impacted values.*

Issue
A shared goal in relation to some established weeds, for example invasive pasture grasses, is ideal, but not realistic.
This vision risks 'high conflict' weeds being neglected, or an inordinate amount of resources being directed towards fostering agreement rather than effective management.
The long term goals of the framework must be achieved whether they are shared by all stakeholders or not.

Solution
Focus vision on desired long term outcome / impact.

Issue
At times the most 'practical solution' for a weed (e.g. aerial spraying large areas with herbicide) may not be the best practice solution.
Solution
Use "*best practice methods*"

Suggested NEWP vision
"*Stakeholders fairly and effectively manage establish priority weeds at all levels, use best practice methods, and meet regulatory requirements for weed control and protection of impacted values*"

Does the Program Logic adequately describe the problem, the outcome of NEWP and how it leads to the long-term outcomes (taking into account the assumptions)?

The relationships / causal linkages between the components are not adequately described.

- Too many elements of the program are lumped together, making the causal link between each specifically related problem - input - output - outcome unclear. If this template is to be used it would be better to use seperate tables for each element (e.g. https://aifs.gov.au/cfca/sites/default/files/example_of_a_completed_program_logic.pdf)
- A more sophisticated program logic model that allows better description of the causal linkages in such a complex program would be better.
- It would be good to incorporate a program logic specifically designed to describe the educational elements (e.g. the Bennetts Hierarchy Model).

The Program Logic should be align with the priorities of the AWS and EPNS. I suggest using AWS Goals 2 and 3 to form the problems statements - see example below.

Problem statements
They are too broad, they need to be targeted and specific
e.g. The knowledge, capacity and commitment of key stakeholders to play an active and constructive role in weeds management needs to be developed.

Assumptions
Assumption behind each component and causal links must be described, not just assumptions behind the framework as a whole.

Why is there such an emphasis on development of control methods and greater access to information when Module 7: Back ground states only 50-60% of land managers see this as a priority?

If the current Program Logic is to be kept as is, the following should be added:

Problem statement
Explicitly include the impact on culture (there is a lot of evidence on the impact of established weeds on Aboriginal culture and cultural values associated with biodiverse ecosystems and particular places).

Inputs
AWS principles
Skilled workforce

Organisational structures

Legislation and other regulatory and policy requirements for weed control and management rather than in 'external factors'

Outputs: activities
Economic evaluation tools (for all areas including for health, culture, environment)

Outputs: participation
'Pastoral leases' are best described as private land managers rather than organisations (given pastoral leasehold is land leased to a private individual or company for pastoral purposes).

Long-term Outcomes
"Tools and knowledge are contributing to **effective** *strategic, landscape level control programs for established weed priorities".*

External factors
Vested interests

Are any eligible actions missing from the scope of the framework?
Forestry should be included under primary industries

Details of evaluation. Measures to be used. Should be contracted to evaluation group that is independent of stakeholders.

International collaboration (e.g with the US in buffel grass control)

Module 2 – Governance of the NEWP framework

What is the most preferred governance model option for the NEWP steering group, in terms of being able to fulfil its intended roles and stakeholder inputs?

My preferred governance model option for the NEWP is Option 2 - Government-led Steering Committee (+ Stakeholder Advisory Group(s) with responsibilities described in legislation.

This model adheres most closely with standards of democratic legitimacy, including participation, inclusion, control, accountability, and deliberative quality. It also has the best inbuilt risk governance with both the institutional structure and the policy process that guide and restrain collective activities of participating stakeholders.

The government is ultimately responsible for administering legislation and regulation and for ensuring these meet community standards and serve the public good, not particular sectors at the expense of others.

Governments hold the most resources (political, moral, and financial), they are embedded within and are accessible to, the most networks, and are not as vulnerable to capture by particular vested interests.

This model is best placed to increase the inclusiveness and participation by bringing in actors that have so far been marginalised / underrepresented.

Clearly stakeholder input via a stakeholder advisory groups is essential. In high conflict area of weeds management, where stakeholders often have diametrically opposed interests, mechanisms for checking and balancing internal and external interests and power relations are paramount to success. To make sure no voices are lost I recommend separate advisory groups to communicate the advice of land managers, those concerned about the outcomes of weed management, and Aboriginal cultural values. These groups could periodically meet together to ensure each others' values and concerns are understood and collaborate.

I do not support the Board plus Stakeholder Committee or Stakeholder-led Steering Committee models because these create a very high risk of exacerbating unfair power imbalances in an environment where stakeholders have extremely different resources at their disposal and degrees of reach. They are also high risk given there are potentially low levels of cooperation and buy in among some of the most powerful and relevant actors and there is little recourse to mobilise sanctions in the face of non-compliance or unfair actions.

My least preferred is the Board plus Stakeholder Committee model. Corporate governance arrangements have greater risks of considerable unintended structural effects, including the distributive effects of market and competition structures.

If the committee is dominated by one stakeholder group (e.g. industry) it will fail to have legitimacy. Legitimacy can only be gained through fairness - balanced power across stakeholder groups.

The Threatened Species Commissioner should endorse / approve annual work programs and reporting on implementation to ensure the plan are effective in protecting public / natural / community assets and meets Commonwealth regulatory requirements.

The Australian Commonwealth Ombudsman should annually report and audit decision making processes for inclusion, fairness, lack of interference and effectiveness.

The steering group can build political support for its function whilst being apolitical in how it operates by situating itself with the Executive division of the Australian political system, which has been developed over hundreds of years to facilitate communication and separation of powers.

What adjustments would you make to improve any of the models?

Incorporate systems for ensuring vested interest do not override public interest and all stakeholders' voices are heard.

I recommend this could be achieved in Government-led Steering Committee model by having two separate stakeholder committees for the respective stakeholders responsible for:
1) managing weeds (e.g. land owners) and
2) the outcomes of weed management (e.g.community).

A technical advisory group to advise on emerging technologies, ethics should also be considered.

An Aboriginal and Torres Strait Island Advisory Committee is essential.

What concerns do you have about the effectiveness of a NEWP steering group in overseeing the implementation of the NEWP framework?

I'm very concerned that industry influence / vested interest / unbalanced power structures will impact the committees ability to protect environmental and social assets.

Industry stands to profit greatly from ongoing lack of management of many weeds, particularly pasture grasses.
No matter what the funding arrangements, they will continue to have a disproportionate amount of money and resources at their disposal compared to community groups.
They will continue to exert pressure and influence over decision making in both direct and indirect ways.
A steering group may not be the most robust way of governing against the very real risk of undue influence / corruption.

I would like to see an independent audit of how well collaborative efforts have worked to established weed outcomes (in particular conflict weeds) before an overly partnership / collaborative approach is doubled down upon.

I'm also concerned that the vast majority of partnerships strengthen the participation of those actors that already participate (governments, industry and those civil society actors that have already had a say in governance). In many cases, those that were marginalised before (for example, Indigenous groups, women and youth) continue to be marginalised in the 'partnership' process.

Is there an existing organisation or program that has the ideal governance model for the NEWP framework to adopt?

Any further comments you would like to make on governance?

Budget control should only be given to the Steering Committee if it is government led, otherwise too much power is centralised in a non-democratic body.

Module 3 – New Weeds of National Significance
Are there questions missing from, not required or that need rewording in the list of screening questions for new WoNS? 11. The species is not widely cultivated in Australia. This criteria precludes many conflict weeds from further consideration. This is not acceptable, it embeds bad practice and gives the agricultural industry complete power over selection.
What concerns would you have about a publicly available, online nomination process for new WoNS?

Any further comments you would like to make on determining new WoNS?

The involvement of stakeholders must be transparent (all meetings should be minuted and, along with all reports, made publicly available)

Levels of stakeholder support should be assessed using rigorous methods by independent weeds departments / organisations (not linked to particular stakeholder groups e.g agriculture departments or industry / corporate 'think tanks' such as the Centre for Invasive Species Solutions).

Data collection and analysis methods should be rigorous and not biased in favour of those who benefit from planting and spread of weeds (e.g. pastoralists and invasive pasture grasses)

Selection criteria 'feasibility of management' creates a catch 22 for weeds that require a focus on RD&E (without WoNS listing it is harder to attract funding / support for this RD&E, but without it they will never be listed as a WoNs). I appreciate the referral process to NEWAL for weeds not listed as WoNS or WINS seeks to address this issue.

3. Communication and Consultation
The identification of weeds must be based on risk, long-term goals and statutory commitments such as those outlines in threatened species abatement notices.

Decisions on whether a weed is a WoNS should always be a technical matter led by independent experts. However, the stakeholder advisory groups proposed in relation to governance (two separate stakeholder committees for those groups responsible for 1) managing weeds and 2) the outcomes of weed management) should be invited to comment on the technical assessments to ensure value consideration are known.

Experts with conflicts of interest (e.g. employed by corporations with vested interests, or this who receive industry funding for research) should be excluded from the process.

The EIC should not delegate responsibility for the assessment process to the steering committee unless it is government led (although the EPDNS is so dominated by industry that any hope for independent, evidence based decision making that holds the public interest as paramount already appears heavily compromised).

Stakeholder involvement in weighting criteria
Stakeholders should not be involved in weighting criteria, this degrades the process, leaving it open to subjective value judgements, poorly informed decision making and undue influence from stakeholder power imbalances. It creates unnecessary potential for conflict among stakeholders who have diametrically opposing values.

Transparent and Inclusive
Consensus building
Many of Australia's governance frameworks are built on opportunities for opposition to be heard. Trying to bury opposition in rounds of reviews, which many of the less resourced may not have the capacity to participate in, is a resource intensive, unrealistic process.

Access best available information
I'm very concerned about overstating the role personal opinions in assessment of weeds. Clearly there is a need to harness the on ground experience and knowledge to make sure research is appropriately targeted, emerging issues identified and opportunities taken. Under the Government led model these opinions and advice could be accessed via the stakeholder committee process However, it should NEVER take the place of rigorous evidence based decision making.

3. Nomination and screening WoNS candidates.
I agree that community should be able to nominate WoNS.
If there is a limited number of WoNS that can be listed, there should be processes in place to ensure industry nominations, which will be better resourced, do not dominate. There must be mechanisms for ensuring balance and fairness.

Quantifying economic impacts where feasible using industry data

There are many data sources outside industry that can be used to quantify economic impact on the community and environment e.g. health data can be used to quantify economic impact of health issues rated to weeds, emergency management data can be used to quantify costs in relation to fire management. Module 7 highlight the glaring gaps that result from sole reliance on industry data for economic evaluation. Industry clearing has a vested interest that will (consciously or not) led to bias in their data collection and interpretation. There must be mechanisms for independent review of any information they provide.

National Panel of Experts
Must be Independent. No formal link (affiliation, implement contracts) with vested interest. If so, the panel must be balanced e.g. if the is an expert affiliated with MLA, there must also be one affiliated with an environmental advocate. All minutes and reports must be publicly available.

Questions within the ABARES WoNS assessment model
Impacts 3 - the number of ways a weed can impact health (which is defined by the WHO as a state of complete physical, mental and social wellbeing and not merely the absence of disease and infirmity') are far greater than the three listed. These three categories are too restrictive - they should be removed.

Socio-economic and Environmental Values
Economic
The economic impact of established weeds reaches far beyond the agricultural and forestry industries. Sophisticated economic evaluation methods have been developed to measure these, they must be utilised and the findings incorporated. e.g. health economic evaluation using DALYs and QALYS to measure economic impacts.

Social
Cultural impacts are not limited to heritage / sites. The threats to Aboriginal cultural values are far more extensive than damage to cultural sites. Weeds clearly impact many cultural values associated with ecological values across the landscape. The understated impact on Aboriginal cultural values and measures to address these seems a major shortcoming across the document.
Australia is a multicultural country, limiting cultural sites to those of European and Aboriginal and Torres Strait Islander peoples, is offensive.

Module 4 - Weed Issues of National Significance

Do the four categories of WINS described here:

a) provide greater clarity around what a WINS could be and the need for it?

Yes to: 1 (Technical impediments); 3 (integrating management); and 4 (protecting economic, environmental and social assets)
No to: 2 (Wicked problems)

b) seem like things that would benefit from a strategic, integrated approach to weed management at a landscape scale within the broader issue?

Yes to: 1 (Technical impediments); 3 (integrating management); and 4 (protecting economic, environmental and social assets)
No to: 2 (Wicked problems)

I'm concerned by the characterisation of conflict weeds and lack of coordination across tenures as "wicked problems". These issues should be recognised for what they are as failures of leadership, legislation, funding or capture by vested interests and should be addressed elsewhere in NEWP. They can be solved.

I'm concerned introducing this idea as a WINS is legitimising the idea that prioritising industry profits over public good is acceptable.

Are there steps that are not needed or are missing in the proposed WINS selection process?

re: 1.(v) the second bullet point "issue **has not been** adequately addressed through an existing national strategy or other process? Y/N, I would prefer this to be "issue **cannot be** adequately addressed through and existing national strategy or other process? Y/N

This change is needed to avoid the substantial risk that the WINS is used to park issues which should properly be dealt with through existing strategies and processes.

Are there alternate ways to prioritise issues that could be used instead?

Any further comments you would like to make on selecting WINS?

The introduction of the WINS concept should not be used to justify dropping weeds from the WoNS list.

Module 5 – National Established Weeds Action List
Is the process for actions to be placed on the NEWAL clear?
Are there alternative options for how an action is prioritised for inclusion on the NEWAL?
Any further comments you would like to make on NEWAL? I note on page 50 the situation of information gaps for WoNS is raised: "For example, a proponent may nominate a species as a WoNS but lack sufficient evidence to meet all of the screening questions. This will exclude the species from further assessment (and WoNS status) but may warrant its inclusion on the NEWAL to fill this knowledge gap. This is supported but propose the process diagram (5.2) should include and arrow back from NEWAL to WoNS/WINS Assessment for reconsideration when the information is gathered or if management goes backwards.

Module 6 – Implementation
Do you agree with the scope of the strategic plans as outlined above? It is doubtful whether community groups will have sufficient financial resources to make any meaningful contribution toward implementation however community groups' time, energy, advice and advocacy is essential. These in-kind contributions should be recognised and supported by listening, response and investment. It should be recognised that weed control is incredibly time consuming and frustrating when actions to eliminate the source of weeds are not happening.
Is there anything you would include/exclude from the scope or content of the strategic plans?

Do you support the idea of a national repository as a way of supporting ongoing management for the current 32 WoNS and new WoNS/WINS into the future?
Are there other actions that should be included in the national repository?
How could the actions under the national repository be funded/coordinated?
Do think there should be a formal nomination/selection process for taskforce membership? Or would you be happy for members to be appointed on merit by the NEWP steering group/national coordinator? Formal merit based process that precludes those with a clear conflict of interest (e.g. in the spread and growth of particular weeds) or the use of particular management strategies (e.g. herbicide manufacturers and distributors).
Assuming taskforces are nationally focused, what support can they be expected to provide groups working at the state/regional/local levels?
To what extent should taskforces influence/inform the NEWP framework's overall direction? How would they interact with the NEWP steering group?
Do you support the need for specialist support services at the national level for NEWP delivery (e.g. communications, GIS, Monitoring & Evaluation)? Yes. These should be indpendant (e.g. contracts given to evaluators from evaluation units / the Australian Evaluation Society, not Agricultural Departments / invested think tanks such as the Centre for Invasive Species Solutions or their employees)
Are there additional coordinator hosting options that are not captured here? Which hosting model/s will be most effective?

How important are the coordinators' formal links to State/Territory agencies in aiding their engagement/buy-in for framework implementation?

To be seen as legitimate and not compromised the should be independent.

Do you agree that co-investment by governments, industry and community organisations will be required to successfully implement the NEWP framework?

I agree these stakeholder groups are all necessary participants.

I acknowledge that some landholders go over and above in managing weeds but also these industries are a major source of weeds that have escaped beyond property boundaries. I therefore disagree with industry involvement being described as co-investment. I think compliance with regulations is a responsibility that comes with operating a business.

Industry funding should therefore not be linked to framework oversight or hypothecated toward particular activities. This risks unfair influence and power over decision making. Industry is entitled however to expect that the investment model is efficient and decision makers implement the NEWP in full.

If industry is permitted to contribute to control tool development under the NEWP:

- To ensure academic rigour the research undertaken under the NEWP framework must be peer reviewed by independent reviewers
- To ensure quality and consistency of messaging information and education content and delivery plans must be reviewed by independent reviewers against best practice

There are risks to innovation if industry is allowed to dominate research. Industry 'think tanks' (such as with the Centre for Invasive Species Solutions) have vested interests in focusing on new and expanding existing marketable / product based solutions. There should be clear distinction made to differentiate the advice from groups such as this and the formal advisory and decision making bodies established through the NEWP.

Research organisations and researchers must be transparent about, and declare links to industry conflicts of / interest at every stage of research.

Governments must lead funding of implementation, control tool development, best practice information and education and on-ground control programs.

Landholders profit from assets protection, community groups do not. Where are they going to get the money to contribute if not from the government?

Funding community groups through grants programs is not in keeping with the intent of the EPDNS review, which was to reduce regulatory burden. Funding through a competitive grants is inefficient…

Subscription or membership - gives control over activities to organisations, does not allow community groups to remain independent.

Which of these models should be examined further in developing a co-investment approach for the NEWP framework? Are there other models that should also be considered?

I support all models of funding proposed provided they do not allow parties to avoid fully meeting the cost of their regulatory obligations.

Are there any programs or projects that had/has a co-investment model that could be adapted for implementing the NEWP framework?

Any further comments you would like to make on implementation?

Module 7 – Background

Are there any other key aspects of national policy relating to established weeds management that are missing from this section?

Module 7: Background highlights that research on the impact and response to weeds has been focused on industry.

The glaring gaps in development / application of methods to quantify economic impacts on community and the environment is glaring. There is a dirth of research into impacts on health and culture (for example, the community in Alice Springs anecdotally reports a large impact of buffel grass on respiratory distress but there is NO research into this).

The overarching strategies (EPDNS, AWS) and this framework do not provide a mechanism for addressing this issue. Rather, they perpetuate and exaggerate the exact gaps that have led to long term failures to manage weeds - heavily industry influenced attempts to find a solution have failed. It is nonsensical to give them even more power and leadership.

This framework offers no processes for resolving issues with 'conflict weeds' conflict apart from setting up structures that allow those with the greatest resources at their disposal to dominate and drown opposition out in a mountain of grant applications and circular process.

This framework does not provide a fresh, innovative, lateral approach to weeds management, it just exacerbates the unequal power relations and vested interests that have money, power and established connections behind them. This is what has led to the current impasse and embarrassing failures of weeds management in Australia.

While I acknowledge there has been a steering committee involved in the development of this framework, the fact that it was contracted to a group with industry ties (the Director of Wild Matter is also employed by the Centre for Invasive Species Solutions) raises serious issues of perception of bias in the process from the outset.

For the sake of transparency we expect all submissions, not just a summary, to be published.