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UPLOADED TO HAVE YOUR SAY

To whom it may concern,

NATIONAL BIOSECURITY REFORMS

Thank you for the opportunity to comment.

We submit that these reforms are too greatly focused on threats to agriculture and responding to the next incursion rather than attending to the rapid decline of ecosystems due to established weeds and decline in ecosystem resilience. We highlight many systemic problems caused by excessive focus on agriculture, industry partnerships and neglect of environmental priorities and seek to have these addressed.

Our submission is organised as follows:

1. The logic for strengthening environmental protections via the NBS reforms
2. Examples that illustrate the systemic problems which need to be addressed
3. Overarching requests
4. Answers to questions raised in the discussion paper.

We frequently reference buffel grass invasion. This is the greatest invasives threat in Central Australia[1], from where we write. This situation is rapidly deteriorating and extending. Urgent attention is needed.

1. The Logic for strengthening environmental protections via the NBS reforms

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1.1 Environmental assets/biodiversity is Australia's greatest exposure for biosecurity threats

The Australian Government's response to the recent review of the International Government Agreement on Biosecurity stated 'Our national biosecurity system protects agriculture, forestry and fisheries exports worth $75.6 billion in 2023-24, international tourism worth up to $50 billion, environmental assets worth more than $5.7 trillion, and more than 1.6 million jobs.'

Furthermore healthy environments underpins opportunities for industry**.**

1.2 Agriculture is the greatest threat to biodiversity

State of the Environment reporting highlights that like Central Australia, established weeds and pest are the greatest threats to biodiversity, yet many of these threats are supported by the Ag sector which is the third greatest threat to biodiversity.

[1] https://pmc.ncbi.nlm.nih.gov/articles/PMC7713970/

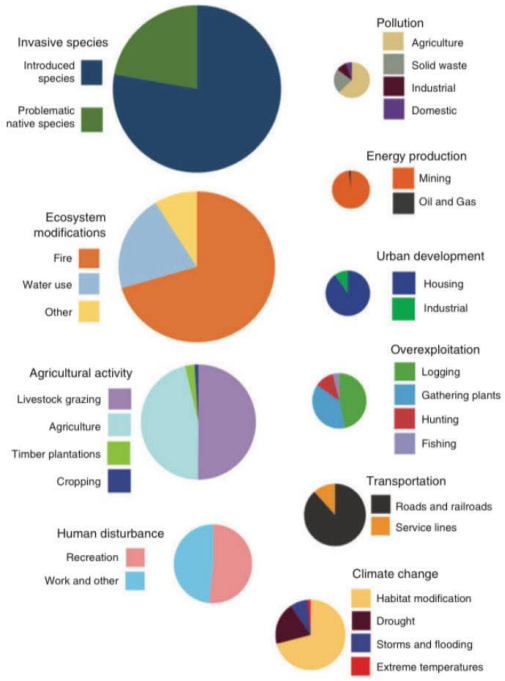

Fig. 1. The prevalence of threats to Australian threatened taxa (n = 1533). Each chart is scaled according to the number of EPBC Act–listed taxa listed as being affected by each threat category (e.g. Urban development). Each pie chart segment represents a subclass threat (e.g. Housing). We removed threat categories that impacted <20 taxa (e.g. Geological events) and subclass threats that impact <5 taxa (e.g. Renewable energy) as they were too small to be displayed effectively. See Table S3 available as supplementary material for further details.

Figure from Kearney et al[2]

1.3. Minister for Environment acknowledges the problem

Recent correspondence we received from the Acting Threatened Species Commissioner on behalf of the Environment Minister (see attachment) states *National biosecurity governance is primarily the responsibility of the Commonwealth Department of Agriculture, Fisheries and Forestry (DAFF). DAFF also leads the National Established Weed Priorities process, under which buffel grass is being considered.*

2. Examples which need to be address and are illustrative of systemic problems

*2.1 **Buffel** Grass invasion*

In central Australia , there can be no doubt that we are watching ecosystems collapse in real time due to buffel grass invasion. It is like watching a train crash which was 50 years in the making.

The chronic transformation and loss of ecosystems, means even relatively common species may be a thing of the past. This is accelerating - the recent extremely wet period there has been intense smothering of native plants due to buffel grass. This is a biosecurity threat to species and

[2] https://www.nespthreatenedspecies.edu.au/media/qile4abf/kearney-et-al-2018_the-threats-to-aus-species_postprint.pdf

ecosystems now and also from the wildfire risk posed in the next spring (especially under *El Nino* conditions). We could be watching an extinction event, not to mention the enormous threat to sacred sites and human life and enormous costs.

The inaction on buffel is proof by *reductio ad absurdum* that governance arrangements that allow effectively a veto right to the agricultural sector of those are hard-wired to fail other sectors. Instead of timely action to turn buffel grass invasion around when the warning signs were noticed, the existing threat abatement advice[3] has been ignored.

2.2 Dingoes

At the behest of animal industries (plan is published by Wool Innovation Limited) dingoes under the banner of biosecurity are mischaracterised as wild dogs and poisoned using inhumane1080 poison under the Wild Dog Action plan. There are numerous peer reviewed studies attesting to the stupidity of the flawed assumptions in the Wild Dog Action Plan e.g. Edwards et al 2022[4] Furthermore the Wild Dog Action Plan pays insufficient regard to dingoes' right ethical treatment, their role in sustaining ecosystems and cultural importance.

2.3. Disregard for Native Bees and pollinators under biosecurity arrangements

1. Native bees are in decline with European Honey Bees are a threat to many native bees and many other native species, yet the Wheen Bee Foundation, a champion of European Honey Bees is drafting the national pollination strategy with funds from the Ian Potter Foundation instead of the Government.
2. Concerns of varroa mite impacts on European Honey Bees appear to be being prioritised over risks to native bees, which are at risk from the fipronil used to kill infected feral European bee hives.
3. Other risks to native pollinators e.g. pesticides used to address biosecurity risks like red fire ants go unchecked.
4. Native bees are often culturally important yet these values are rarely recognised.

2.4 Cultural values and sacred sites, totemic species are in decline and often threatened by invasives

E.g. refer Umuwa Statement on Buffel Grass[5]

3. Overarching requests

Based on the above concerns we want:

1. **Boosting representation of environment, Aboriginal culture membership on all committees and include an ethicist on all committees**
2. **Relevant ministers (in particular ministers for Environment and Indigenous Affairs) should be able to control biosecurity decisions relevant in their portfolio areas**

[3] https://www.dcceew.gov.au/environment/biodiversity/threatened/threat-abatement-advices/buffel-grass-introduction

[4] https://connectsci.au/wr/article-abstract/48/6/531/41046/Lethal-control-reduces-the-relative-abundance-of?redirectedFrom=fulltext

[5] https://www.indigenousdesertalliance.com/publications/umuwa-statement-on-buffel-grass

3. **An urgent audit of Governance and Competition arrangements by Productivity Commission and Australian Competition and Consumer commission respectively. These are needed to**
    a. **Remove vested interests from committees and ensure the public interest is served**
    b. **Profit for purpose companies and industry groups are removed decision making bodies.**
    c. **Scrutinise established contracts and plans which have resulted from undue industry involvement (see 4)**
4. **Review of plans programs codesigned with industry, especially those delivered under the CISS National Coordinator model**
    a. **Model with Centre for Invasive Species solution hosting industry driven plants needs to stop – as demonstrated by Wild Dog Action plan, these industry led plans lack credibility and are corrupted by the profit motives of those involved;**
    b. **We need an urgent review of the wild dog action plan and no new industry led plans, this review should include bringing the purported National Pollinator Strategy into government.**

5. **Buffel grass invasion needs to be urgently arrested, without interference from those who advocate for its spread but do not pay their shifted costs.**

4. Answers to questions raised in the discussion paper

Part 1 – overall reform prioritisation and sequencing

1.1 Do the proposed reform themes adequately address the strategic risks?

No. I understand these are based on the program logic outlined in the NBS Implementation Plan, however there are key strategic risks that are not addressed and this program logic is based on flawed assumptions.

Strategic risks that are not described

1. That the Minister for environment and Minister for Indigenous affairs have no power to effect matters that impact their portfolios – eg environmental offsets are insecure because Agriculture Minister is allowing buffel to keep being spread.

2. Dominance of industry groups and agricultural sector in decision making is highly inappropriate. As mentioned an emerging example is that the invasive honey bee industry writes strategy to protect European honey bees' role as pollinators despite European bees being an immense risk to Native bees.

3. There is a clear risk that not that vested interests collaborating as decision makers or observers will skew priorities in their favour.

4. Commercial interests have a profit motive in choosing the types strategies to manage biosecurity risks – eg: prioritising pesticide applications to control buffel infestations rather than limiting buffel use will provide an immense and endless income stream for suppliers at cost to the public; the same applies to choosing inhumane 1080 baiting programs rather than focusing on ecosystem resilience.
5. Contracts are awarded to observers on committees

Flawed assumptions underpinning the NBS

Appendix B2 in the NBS implementation plan lists the assumption *'Activities under shared biosecurity culture and stronger partnerships contribute to all NBS priorities'*.

To those concerned with environmental risks and risks to Aboriginal culture stronger partnerships with industry manifest as corruption of process and corporate bullying.

To address this flawed assumption decisions and strategies to protect biosecurity should be made by public authorities in the public interest and described in laws and policies. (As repeatedly noted unchecked buffel grass being allowed to march all over the country against almost every stakeholder's wishes is proof of how flawed the current approach is.)

1.2 How should the reform themes be prioritised/sequenced and why?

Legislation and regulation is the highest priority however the focus of proposed reforms is wrong. The priorities should be:

1. Better inclusion of representatives of the environment and aboriginal culture, who have formal responsibility to represent these sectors
2. Productivity Commission urgently to review governance arrangements and recommend a governance architecture that ensures statutory requirements other than agriculture (notably but not exclusively environment and indigenous affairs) are properly served by biosecurity architecture and that the involvement of industry lobby groups and non for profits does not corrupt what should be decisions of government.

   (One current example of biosecurity arrangements interfering with efficacy of other legislation is that the Minister for Environment is seeking to approve environmental offsets under the EPBC Act reforms, yet has zero ability to assure offset measures can be sustained due to the deterioration baseline in areas where buffel grass is spreading.)

3. The Australian Competition and Consumer Commission (ACCC) which has responsibility to promotes competition and fair trade in markets to benefit consumers, businesses, and the community should urgently report on the appropriateness of stakeholders with vested interests being at the table, review existing contracts and advise on suitable arrangements going forwards.
4. Replace Invasive Species Council on the NBS Implementation Committee (NIC) with <u>multiple genuine environmental advocates</u> – this could include a representative from the new National Environmental Protection Agency and/or the Threatened Species Commissioner.

   Explanation: The ISC is the only body that even vaguely purports to represent the environment on the NIC, however it relies on and has strong relationships with ther agriculture sector. This reflects 'double dipping' by the agriculture sector at the cost of groups with a specific environmental charter. Furthermore ISC has complex, potential pecuniary ties with the Plant Health Australia, Animal Health Australia and the Centre for Invasive Species Solutions via the 'Biosecurity Collective'. Our experience is that these complex and very close relationships are leading to a focus on protecting environments away from rural areas; are a barrier to strongly prosecuting the issues associated with the agricultural sector's biosecurity impacts; and leads to a focus on issues and 'solutions' that can be implemented by ISC's 'profit for purpose' affiliates. We are also concerned that this is leading to monopolies in who delivers environmental

biosecurity services and how. The consolidation of activities into one collective is stifling to innovation and a deterrent to building real social licence - rather than responding to community concerns they reverse engineer their preferred approaches and services into biosecurity plans.
5. Include Aboriginal representation on the NIC.
6. Any profit for purpose organisations or industry lobby groups should be removed from the NIC and all subsidiary committees.
7. Urgently review any plans which have been subject to industry interference, including the Wild Dog Action Plan.
8. Urgently intercede in the preparation of Wheen Bee Foundation Australian Pollination Strategy, which appears to be replicating industry driven biosecurity plans.

1.4 What opportunities exist to leverage partnerships for better outcomes?

See above. Need to identify where partnerships are facilitating industry interference and outcomes that are not in the public interest.

1.5 Are there any significant barriers or risks that could limit the effectiveness of these proposed reforms?

See above. Especially concerned about industry and lobbyist interference, excessive focus on agriculture sector and that Agriculture Ministers have too much power.

Flawed assumptions about complexity being bad in regulation and partnerships being necessary. Public health biosecurity responses are government led and solidly underpinned by legislation.

Part 2 – proposed reforms by theme

Preparedness

2.1 How should these preparedness reforms be prioritised/sequenced and why?

- Established weeds, including buffel grass should be prioritised over 'uplift of the national database for cattle, sheep and goats'.

- Threats to sacred sites and culturally important species as exemplified by threats posed by buffel grass and threats to dingoes and native bees needs to be prioritised

- The ignored actions in the buffel grass threat abatement advice[6] need to be fully implemented, including the search for a biological control.

2.2 Are there significant gaps in national surveillance and preparedness coordination?

- Buffel grass mapping is urgently needed on account of threat to ecosystems and fire threat to ecosystems, infrastructure and life which we consider are extreme in the coming year due to recent heavy rain in infested areas. The mapping technique developed by Box et al 2026 [7] enables high resolution maps to be produced quite rapidly.

[6] https://www.dcceew.gov.au/environment/biodiversity/threatened/threat-abatement-advices/buffel-grass-introduction
[7] https://link.springer.com/article/10.1007/s10661-026-15183-7

- The is an extreme risk of dangerous fires threatening biosecurity, life and infrastructure buffel infested areas in Western Queensland and central Australia after recent record breaking rains.

Operational capability and capacity

6.4 How do you think First Nations knowledge, citizen science, and frontline insights could be better integrated into biosecurity operations?

Inclusion of multiple first nations people on all groups within biosecurity governance architecture, including the NBC and NBC Implementation Committee is essential.

It needs to be recognised that the agricultural sector, agricultural media is often openly hostile to people advocating for views that they do not agree with and is wary of their obligations to Native Title Holders and under legislation. This is not a welcoming environment.

Legislation and regulation

Refer answers to 1.1 and 1.2

Funding

8.3 How could existing cost sharing or funding arrangements in other sectors be leveraged or adapted to support changes to national biosecurity cost sharing or funding arrangements?

Non-monetised costs associated with biosecurity are insufficiently considered (at least this is our experience with respect to buffel grass). An impactor pays model is needed to recover these shifted costs.

Part 3 – National Biosecurity Strategy implementation

Governance

9.2 How well do existing NBS governance arrangements support ongoing implementation?
Very. Very badly. Many ecosystems are in decline or collapse and portfolios other than Agriculture are suffering from the decisions made by Agricultural sector.

9.3 What improvements could be made to NBS governance arrangements to enhance effectiveness and impact?

Refer earlier answers.

Thank you for your consideration. We welcome the opportunity to expand upon this submission.

Kind regards,

Adrian Tomlinson & Jacqueline Arnold
Letters for the Environment Central Australia

Written with respect on unceded Central Arrernte Lands

Attachment: letter from Minister for Environment representative passing responsibilities to the Minister for Agriculture

Australian Government
Department of Climate Change, Energy, the Environment and Water

MC26-004611

Mr Adrian Tomlinson
Letters for the Environment Central Australia
leca.nt.au@gmail.com

Dear Mr Tomlinson

Thank you for your correspondence to the Minister for the Environment and Water, Senator the Hon Murray Watt, concerning buffel grass. Minister Watt has asked me to thank you for your correspondence and to reply on his behalf.

The Australian Government recognises buffel grass as a serious and increasing threat to the biodiversity and culture of Central Australia. Buffel grass is considered within the 'novel biota and their impact on biodiversity' key threatening process under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

'Ecosystem degradation, habitat loss and species decline due to *Cenchrus* species (Buffel grass and associates), has been nominated for proposed listing as a separate key threatening process under the EPBC Act. The Threatened Species Scientific Committee is preparing a draft assessment, which will be released for public comment in 2027.

This department is supporting action on buffel grass as part of implementing the *Threatened Species Action Plan 2022-2032*. Implementation of the Action Plan includes targeted investments to priority places and species. Work to address invasive species like buffel grass is usually undertaken as part of integrated projects aiming to improve habitat condition and support threatened species recovery.

The EPBC Act and Regulations do not currently enable a national ban on the cultivation, sale or distribution of a plant species. Some state and territory biosecurity legislation includes provision for weed declaration so as to enable bans on propagation, movement and/or sale of plant species.

National biosecurity governance is primarily the responsibility of the Commonwealth Department of Agriculture, Fisheries and Forestry (DAFF). DAFF also leads the National Established Weed Priorities process, under which buffel grass is being considered. One of the possible outcomes for weeds identified as a national priority is categorisation as a Weed of National Significance. Please refer to the Weeds Australia website for updates.

The *National Weed Biocontrol Prioritisation Results*, available at https://weeds.org.au/wp-content/uploads/2025/05/NWBPS-Prioritisation-Results.pdf, outline the prospects of developing an appropriate biocontrol agent for buffel grass as very low. Given this, the national Environment and Invasives Committee has not prioritised buffel grass for weed biocontrol research and development.

Thank you again for bringing your concerns to the government's attention.

Yours sincerely

Kat Waterhouse
Acting Threatened Species Commissioner
26 May 2026