Tasmania's Threatened Species Strategy Discussion Paper

Submission by the
Invasive Species Council

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About the Invasive Species Council

The Invasive Species Council was formed in 2002 to advocate for stronger laws, policies and programs to keep Australian biodiversity safe from weeds, feral animals, exotic pathogens and other invaders. It is a not-for-profit charitable organisation, funded predominantly by donations from supporters and philanthropic organisations.

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Executive Summary

The Invasive Species Council welcomes the opportunity to comment on the proposed Tasmanian Threatened Species Strategy. We welcome any questions relating to this submission, and look forward to further engagement during the next phase of the strategy development.

The Invasive Species Council is an independent donor-funded organisation that safeguards the Australian environment from invasive pests, weeds and diseases. Formed in 2002, the Invasive Species Council has been at the forefront of efforts to strengthen biosecurity in Australia to better safeguard our land and seas from invasive species. We strive for a future in which invasive species are no longer a major cause of environmental decline and extinctions.

Invasive species are Australia's leading cause of animal extinctions and, along with loss of habitat, are the highest impact threat to nationally listed threatened species and ecosystems (Kearney et al. 2019). Tasmania's island status and strong biosecurity protocols have limited incursions of invasive species, contributing to Tasmania's mainland species that are now extinct on the mainland, or are on the verge of extinction.

Despite Tasmania's natural advantage, invasive species remain one of the most significant threats causing extinctions and declines of Tasmanian biodiversity, as well as necessitating costly and disruptive eradication programs to protect agriculture and trade. Unfortunately, the number of detections and incursions of potentially invasive species in Tasmania are increasing from trade and tourism, and established invasive species continue to cause ecological damage.

The main method of conserving biodiversity, through protected areas, can only be effective if key threats are actively managed and mitigated. The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) report highlights the opportunities in conservation through prioritising the threat of invasive species. Thus, it is critical for any threatened species strategy to prioritise managing the threat of invasive species in Tasmania. This includes preventing new incursions, prompt and effective response to new incursions, and controlling established invasive species. Island eradication programs are the flagship approach for demonstrating the outcomes of investing adequate resources to address feral animals and plants and their impacts.

In recognition of the threats invasive species pose to threatened flora and fauna in Tasmania, the Invasive Species Council has made 8 recommendations for the proposed Threatened Species Strategy.

Recommendations

Recommendation 1: Set an ambitious goal of no new extinctions in Tasmania, in line with the federal government's commitment.

Recommendation 2: Develop and implement a dedicated Island Recovery program, focusing on feasible eradication of invasive species from priority off-shore islands, including eradicating feral cats from lungtalanana/Clark island, feral deer and cats from Bruny and King Islands, and feral pigs from Flinders Islands.

Recommendation 3: Develop and strengthen Threat Abatement Plans and planning for Tasmania, as well as supporting and implementing relevant federal Threat Abatement Plans. As part of this, the Tasmanian Government should:

a. Comprehensively identify and list key threatening processes through an independent scientific process, supplemented by a public nomination process. Regularly review the list of threats to ensure it remains up to date.

b. List threats in a hierarchical scheme of key threatening processes and environmental threats of state significance. Establish an additional threat category – emerging threatening processes.

c. Design a fit-for-purpose abatement response for all listed threats, including threat abatement plans or action plans (e.g. for cross-sectoral threats), regional plans, and policy and regulatory responses.

d. Establish an implementation taskforce for each major threat response, with a coordinator to drive implementation of plans for the priority threats. Facilitate collaborations by governments, Traditional Owners and community and cross-sectoral stakeholders on abating major threats.

e. Systematically monitor and report on threat abatement progress. Introduce independent oversight of the threat abatement system.

f. Substantially increase public spending on threat abatement and threatened species recovery, and allocate funds based on a transparent prioritisation process.

Recommendation 4: Identify fallow deer as a priority established invasive species for management to protect threatened species and ecosystems and take actions including:

a. Commence control programs on satellite populations where eradication of feral deer is clearly achievable, including the Tasman and Freycinet Peninsulas, on Bruny and King Islands, around Hobart, Launceston, and in the northwest.

b. Appoint six regional feral deer coordinators to work with landholders and the community to scale up feral deer control activities.

c. Ensure stronger enforcement of deer farming regulations to prevent reinvasion or new populations of deer.

d. Maintain the commitment to eradicate deer from the Tasmanian Wilderness World Heritage Area and ensure no new populations are allowed to establish.

e. Declare feral deer a pest species.

Recommendation 5: Identify feral and roaming pet cats as a priority established invasive species for management to protect threatened fauna and take actions including:

a. Declare feral cats a pest species.

b. Prioritise feral cat eradications on off-shore islands, such as lungtalanana/Clark Island

c. Strengthen cat containment legislation, funding and policies, including through:

    i. promoting the uptake of cat prohibition zones and cat containment by local governments,

    ii. mandating prohibition zones in areas of high conservation value,

    iii. supporting community education and enforcement of cat containment policies, desexing and pet registration.

d. Develop and implement a comprehensive state-wide feral cat strategy that aligns with the national Threat Abatement Plan for predation by feral cats, with appropriate funding from the outset.

e. Appoint a state feral cat coordinator to implement the state-wide plan, support community action and education and to complement and support the work of the National Feral Cat Coordinator.

Recommendation 6: Ban ferrets being imported to Tasmania or kept as pets to prevent establishment.

Recommendation 7: Prepare for an effective response to High Pathogenic Avian Influenza (HPAI).

1. Surveillance and data collection including reporting and investigation of all unusual and mass sickness and deaths in domestic and wild birds, and wild mammals and intensified surveillance and biosecurity measures in high-risk situations, e.g. where seabirds and mammals interact.

2. Employ a cross-sectoral One Health approach for communication and coordination of preparedness and response to HPAI.

Recommendation 8: Continue to support the eradication of fire ants and commit to Tasmania's full share of funding for the National Fire Ant Eradication Program

Responses to questions in Threatened Species Strategy Discussion paper

QUESTION 1: *What key elements in the 2000 Threatened Species Strategy should be considered when developing the new Strategy?*

As the number one cause of extinctions and biodiversity loss in Australia (IPBES, 2023), addressing and abating this threat should be front and centre in the new strategy. A threatened species strategy needs to address invasive species and link closely with biosecurity activities and policy. The Invasive Species Council supports the continued prioritising of biosecurity controls that help to limit the invasion and establishment of exotic pest plants and animals and the need for prepared response activities.

It is positive to see the development of a new Tasmanian Biosecurity Strategy 2022-2027, which has incorporated concepts of shared responsibility and culture and a General Biosecurity Duty that was implemented with the *Biosecurity Act 2019*. The strategy also acknowledges the precautionary position while faced with the steadily increasing biosecurity threat from external sources.

Continued progress and commitment to modernising and strengthening Tasmania's biosecurity system is welcomed and should continue on from the reform of legislation in 2019, to the new biosecurity strategy. The focus on prevention and early eradication of newly detected species will set Tasmania on a path to maintaining its natural advantage, potentially in more ambitious ways such as eradicating established pests, such as feral deer.

Tasmania's policies, programs and funding regarding already established invasive species should be substantially strengthened. Several of Australia's worst invasive species are present in Tasmania and their populations continue to increase in density and distribution. Existing legislation and policies are insufficient to properly address the devastating impacts of these invasive species.

The feral deer population has continued to increase in number and distribution across the state, putting pressure on threatened flora communities. Despite these impacts, feral deer continue to be a protected species in Tasmania, hindering control and threatening highly endangered plant communities in the Midlands and Highlands. Feral cats, despite clear evidence of their devastating impacts, have yet to be declared a pest species in Tasmania, meaning there are no obligations on individuals or agencies to manage them. Unrestrained domestic cats are having a devastating impact on native and threatened fauna (Legge et al, 2020). Stronger domestic cat containment legislation and policies will be vital to protecting some of Tasmania's threatened fauna.

Threat abatement plans are essential for effectively targeting and mitigating specific environmental threats, thereby protecting biodiversity and ecosystems. As identified in the *2000 Threatened Species Strategy a*ddressing threatening processes as opposed to an individual species approach is not only efficient but more cost-effective as single actions may help the conservation of several species. Despite being identified as a priority in the 2000 strategy, threat abatement plans have not been developed for any threatening processes.

QUESTION 2: *Are there any key threats to Tasmania's native species that may be missing, and why are they important?*

It is important to note that the identified key threats to biodiversity, notably climate change, habitat loss, unsuitable fire regimes, and invasive species are interactive and additive. For example, the impact of feral deer on threatened flora communities is likely heightened in the face of unsuitable fire regimes. Fire opens the landscape to be more attractive to feral deer; following the 2019 fires in the World Heritage Area, a 19-fold increase in deer activity in post-burnt areas was recorded (Driessen 2022). Even low numbers of deer can then hinder post-fire regeneration and potentially alter ecosystems (Feral Deer Action Plan 2023).

The impact of feral cats on native animals is magnified in cleared and disturbed (including post-fire) landscapes where they are more effective hunters (McGregor et al 2015). The additive and interacting impacts of climate change, habitat loss, and invasive species make it even more critical to prioritise managing established invasive species alongside any threatened species management.

Ferrets are identified by the State government as a high-priority species to prevent establishment due to the serious risk they pose to Tasmanian mammal populations. Despite this risk, the importation of ferrets into Tasmania is legal with a permit under the Animal Health Act 1995 and prior written permission from the Secretary of DPIW. No permit is required to keep ferrets and there are no limits on the number that can be kept.

High Pathogenic Avian Influenza is currently a global conservation and biosecurity crisis. More science should be done to determine the true risk to terrestrial bird and mammal species, and what the likelihood is of arrival and spread. Prevention and control of HPAI will be challenging, however, the risk to wild birds in Tasmania, while not yet scientifically understood, may be catastrophic.

Red Imported Fire Ants remain one of Australia's most serious and costly eradication efforts. Fire ants are an economic, environmental and human health threat that if left to establish, would lead to unprecedented damage and loss to biodiversity. Approximately 80% of Tasmania is suitable for fire ants, and if left to spread Tasmania could see population declines and habitat loss for native animal populations, with estimated losses of 45% of birds, 38% of mammals, 69% of reptiles and 95% of frogs locally in the presence of fire ants.

It is vital that all jurisdictions commit their share of the national funding required to successfully eradicate fire ants before they spread throughout the country. We therefore call on Tasmania to follow the lead of New South Wales, Queensland, Victoria, the ACT, NT and the federal government in committing their fair share toward the current four year, $592 million fire ant eradication funding agreement.

QUESTION 3: *Do the proposed Vision, Objectives and Guiding Principles provide a sound foundation for the Strategy and Implementation Plan? If not, why not? Are there any important elements missing and, if so, what are they?*

The strategy vision proposed in the discussion paper of "reducing future species decline" and "creation of pathways" lacks ambition. Rather than aiming to simply reduce the decline of threatened species, Tasmania should aspire to a vision of an island haven for the unique

Australian flora and fauna, a haven where the many species in decline or extinct on the mainland are thriving.

Tasmania has the natural advantage of being an island with many off-shore islands and should utilise this advantage to lead the country in protecting biodiversity. The Tasmanian Government should make the commitment to no new extinctions, in line with the federal government's commitment, and should set an ambitious goal to rid priority off-shore islands, such as Bruny, King, and lungtalanana/Clark Island, of invasive threats by 2050.

The Invasive Species Council would also emphasise the importance of collaborating with Traditional Owners, which will be vital to effective protection of Tasmania's threatened habitats and species. There are ample opportunities for collaboration on conservation wins, such as feral cat eradication and priority species reintroductions on lungtalanana/Clark Island.

QUESTION 5: *Do you think the proposed Prioritisation Framework and Strategic Priorities are appropriate? What would you add or change?*

The Invasive Species Council would particularly highlight the importance of systematic monitoring and adaptive management. It is critical to monitor and assess outcomes to assess whether strategies in place are achieving the desired outcome and adapt strategies as needed. Too often conservation efforts, including invasive species management, neglect to assess whether efforts are achieving the outcomes, meaning strategies may be ineffective and wasteful.

There are several existing monitoring programs across the state, such as the extensive species monitoring being undertaken by the University of Tasmania and the Tasmanian Land Conservancy. Collaboration and integration of monitoring efforts for a wide variety of species, threatened and invasive, across the state will make monitoring more efficient and extensive.

QUESTION 6: *What work are you or your organisation undertaking, or planning to undertake, that aligns with the proposed objectives and strategic priorities, and what opportunities are there for your organisation to partner to deliver priorities over the next 5-10 years?*

The Invasive Species Council is striving for a future where invasive species are no longer a major cause of environmental decline and extinctions. We work with a variety of stakeholders at the local, state, and federal level to strengthen laws and policies to prevent future invasions and better protect the Australian environment from invasive species.

In Tasmania, our main priorities are stronger policies on feral deer and feral cat management and domestic cat containment, as well as prioritising efforts on off-shore islands to create havens for native biodiversity.

There are many opportunities for us and our stakeholders to partner with the government to deliver the priorities of the Threatened Species Strategy with a particular focus on mitigating the impacts of invasive species on threatened species and ecosystems.

QUESTION 7: *What research and innovation priorities could support Tasmanian threatened species management over the next 5-10 years?*

Research, development and extension (RD&E) activities for environmental outcomes remain disorganised, de-prioritised, uncoordinated, and under-resourced across Australian jurisdictions and the Commonwealth. Investing in RD&E is particularly relevant to Tasmania, as changes to the climate that are occurring are shifting the natural protections against many invasive species, while also contributing as another key threatening process to biodiversity and threatened species.

Strong biosecurity relies on research and development of new technologies to keep ahead of the increasing pressure and costs of preventing, responding and controlling invasive species. Innovation is needed to deal with the most difficult problems, and to foster this we need to provide long-term grants for promising ideas without a guarantee of success. We only have to look to our neighbour, New Zealand, where ambitious programs are well resourced and commitments have led to ambitious goals.

The Predator Free 2050 program is a huge commitment by New Zealand and the investment in RD&E will have strong returns by improving the country's invasive species control and prevention programs. Tasmania should engage with our neighbour for collaborative ideas on RD&E projects, as a similarly unique island with similar invasive species challenges.

There are some high priority RD&E areas that require jurisdictions across Australia to support and implement to enhance environmental biosecurity capacity for the future. These include:

a. alternate vertebrate control technology e.g. expanded field trials of new methods such as Curiosity feral cat bait (para-aminopropiophenone, or PAPP, a 1080 alternate), feral pig baits such as "Hoggone" could be trialled on Flinders Is.

b. The risk of invasive fungi and other plant pathogens is poorly understood and pathways are not well studied. Myrtle rust is a prime example of this, and the more dangerous strains of this pathogen would devastate Tasmania's forests. We currently do not understand the range of host plants for the current established strain, or where it has spread within the state.

c. Research into more effective and humane methods of controlling invasive species should be a high priority. A broad range of biocontrol technologies should be investigated. Further research into the development of genetic biological controls (Teem et al 2020) may prove fruitful.

d. Improve diagnostics for environmental pathogens and other invasives to better detect incursions and rapidly identify species before they establish in Australia.

e. Fully support and fund the National Environment and Community Biosecurity Research, Development and Extension Strategy (NECBRDES) program to guide RD&E activities under a national, agreed strategy.

Further information

The Invasive Species Council welcomes the opportunity to provide further information and to discuss our submission in more detail.

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