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Queensland Weed and Pest Animal Strategy consultation
Department of Agriculture and Fisheries
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Property Rights Australia submission

Draft Queensland Weed and Pest Animal Strategy 2016-2020

Property Rights Australia (PRA) is a not for profit organisation with members in all states but mostly in Queensland. PRA was formed primarily to protect a range of property rights, including rural property rights.

Our organisation notes that the draft Queensland Weed and Pest Animal Strategy 2016-2020 is intended to address “the environmental, economic and social impacts of Queensland’s current and **potential** weeds and pest animals” (emphasis added). While the economic impact of pests is most likely to be drawn to the attention of PRA by its membership, PRA is of the view that social and environmental impacts are no less important and, for that reason, pest management requires a holistic approach. This calls for shared responsibility in addressing existing pest problems and developing proactive responses to potential pest problems.

PRA notes that the Strategy takes the position that “the primary responsibility [for dealing with pests] rests with the land manager ...”. PRA believes that this position conflicts with the notion of shared responsibility because the land manager’s pest problems can be increased if other parties, particularly the State, do not adopt a proactive stance on pests and – most importantly – potential pests.

The State also has responsibility in managing weeds and pests in National Parks and other crown lands. PRA receives many complaints from landowners who neighbour State control land about a constant battle with weeds and pests building up and coming through the boundary.

Other land that is vacant also poses a risk to neighbouring landowners. This can be excess land purchased by a resource company; land set aside as an offset for various development including for resources projects; land set aside for carbon credits and land purchased and locked up for non-government conservation endeavours.

PRA believes that the policy framework within which pest strategies are formulated may impact rural property rights if government policy does not recognise all pests and/or does not balance obligations appropriately between responsible parties.

This submission will provide some comment on pest species and weeds before addressing stakeholder roles and responsibilities.

Pest Species

- 1 The Strategy mentions the European Brown Hare (*Lepus europaeus*) as a feral animal causing damage (chewing irrigation lines) but it is not listed as a pest species requiring action. Hares are responsible for a variety of damage, particularly to tree seedlings and some crops. In areas of southern Queensland towards the historical limits of the recognised range of the Brown Hare, the species appears to be increasing in numbers and may be more commonly encountered than the rabbit. This is in areas outside the rabbit fence where rabbits have been established for years. In some places, when driving at night, hares may be seen as frequently as one per kilometre. It is noted that hares became such an extreme problem in the New England area in the 1930s, that a bounty was placed on them. While it is hoped that such a situation will not follow the current increase in hare numbers, PRA believes that hares have the potential to become a significant pest problem.

PRA suggests that the European Brown Hare should be added to the list of pest animal species in Queensland with the required action to be “Prevent the spread of and, as far as possible, remove all populations of European Brown Hares.”

- 2 The Invasive Animals CRC lists the Common Myna (*Acridotheres tristis*) and Common Starling (*Sturnus vulgaris*) as pest species in Australia. The Common Myna is spreading rapidly in southern and eastern Queensland. It is not longer confined to built up and cultivated areas but is invading semi-open woodland where flocks of up to 30 birds are frequently encountered. This suggests that the Common Myna is poised to have a very significant and unanticipated environmental impact.

PRA notes that no bird species is currently listed as a pest requiring action in Queensland. PRA suggests that the Common Myna should be listed in the Strategy with a suitable action for prevention of further spread of this pest. Consideration may also need to be given to listing the Common Starling.

- 3 The Invasive Animals CRC lists various feral fish as pests requiring attention. Species listed include the Common Carp and Goldfish, both of which have caused significant damage in the Murray-Darling and other river systems. The Invasive Animals CRC does not list Tilapia although this species is known to occur in some Queensland coastal river systems. PRA notes that if Tilapia should ever reach Murray-Darling, the consequences for that river system would be catastrophic.

PRA notes that the Common Carp is mentioned as a pest in the Strategy, but no response is indicated for this pest. Posting awareness signs on waterways is not a sufficient response. PRA suggests that the Common Carp, Goldfish and Tilapia should all be listed as pests. PRA believes that the departmental leadership should develop management plans to address the problem they present and include this in the Strategy.

- 4 PRA notes that the four species of deer found in Queensland are declared pests and that, for any of those deer outside the specified areas of their tradition range, the land occupier must take all reasonable action to destroy the deer.

There is a contradiction in this because deer are being “farmed” or (more often) simply released on land for “hunting” purposes with no requirement for fencing to ensure the deer stay contained on that property. Populations of feral deer are becoming established in areas around these enterprises. Under the Strategy, the surrounding land managers would be required to control the deer escaping from these enterprises. In other words, the department turns a blind eye to the potential pest problem that these enterprises represent, and expects other land managers to absorb the cost of dealing with the pest problem that is thrust upon them.

While it would be easy to dismiss this as the inevitable outcome of “a few escapes”, there is also the situation where the same “hunting” enterprises may be releasing domestic pig varieties (e.g. Saddlebacks and Tamworths) to “upgrade” the genetics of feral pigs in their area. These pigs are not contained behind fences.

PRA has no objection to “hunting” activities which are directed at controlling feral pests. However, PRA believes that these activities should not be used as a mask behind which feral pest populations are actively increased. This is a problem that needs to be addressed by the Strategy.



Photo supplied by a PRA member – Saddleback pigs released to upgrade feral pig stock.

.Weeds

One pest issue which is regularly drawn to the attention of PRA by its members is that of weeds being spread by vehicles used by resource industry personnel, particularly coal seam gas which requires frequent access across properties.

The biosecurity problem presented by these activities will become more noticeable as time passes. Rather than using neutral government or third party weed washdowns, companies often have their own facilities and are not always vigilant about the washdowns between properties or between different areas of the same property. Third party washdowns are also not reliable. There is some evidence that basically blank certificates have been issued to company employees or contractors. In one instance connected with a matter that ended up in the Supreme Court, fifteen totally random checks of required bio-security documentation showed that seven were in breach, several with no paperwork at all. This represented a failure rate of almost 50 per cent.

Many land holders do not want resource companies on their land, but the legal position as it stands is that they do not have “the right to say no”. The government requires land holders to negotiate terms of access with these companies but provides little to no support when companies breach the agreed terms of access – including activities which contribute to weed spread.

The Strategy states that “the primary responsibility [for dealing with pests] rests with the land manager ...”. But where resource companies have access to land, they must have at least equal responsibility with the land manager for addressing weed problems, and primary responsibility for weed problems on land that is designated for their operations. The Strategy does not explicitly recognise this in the “Stakeholder roles and responsibilities.” This will be addressed in the next section.

Stakeholder roles and responsibilities

While the Strategy identifies a range of Stakeholders from the Australian Government down to the land manager, the statement that “the primary responsibility [for dealing with pests] rests with the land manager ...” suggests that the Strategy is written primarily for the land manager to respond to. There are several ways in which the Strategy could strengthen the concept of shared responsibility.

With reference to the preceding points on pest animals and weeds, PRA suggests:

- 1 That the pest birds and fish be included under the Strategy with “Required actions” which identify the State as the leader in developing and implementing programs to address the pest problem.
- 2 That responses to the feral deer problem arising from deer “farming” and “hunting” operations be developed and incorporated into the Strategy.
- 3 That resource extraction companies and their agents be specifically identified as stakeholders with primary responsibility for weed and (where appropriate) other pest control on the areas of land that they operate on, whether they own the land or the land is only a portion of another land manager’s holding.
- 4 That State control land such as National Parks are better funded so that the State is in a better position to meet its shared responsibility and improves its record as a good neighbour in regards to weed and pest control.

Regards,

Dale Stiller

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