National Farmers Federation

Updating Australia's Strategy for Nature 2019-2030

April 2024

National Farmers Federation

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About the NFF

The National Farmers' Federation (NFF) is the voice of Australian farmers.

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF represents Australian agriculture on national and foreign policy issues including workplace relations, trade, and natural resource management. Our members complement this work through the delivery of direct 'grass roots' member services as well as state-based policy and commodity-specific interests.

Overview

The NFF welcomes the opportunity to provide a submission to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) and provide strategic comment to the six proposed national biodiversity targets to guide Australia's 2019-2030 Strategy for Nature (the Strategy) and updated national contribution to the Kunming-Montreal Global Biodiversity Framework. The proposed targets as outlined have been formulated to address six priority areas as agreed to by Environment Ministers in November 2023. In recognition that Australian biodiversity has been on a downward trajectory for several decades, the largest of any continent in the past 200 years, it is the position of NFF that national biodiversity targets are developed with the appropriate level of ambition and outline a clear path whereby positive, measurable action is delivered across local, regional, and national levels. Such action while supported, must be framed to align with sectoral interests and priorities, and support Australian agriculture's ability to continue producing the nutritious food and fibre to feed and clothe the world.

The Strategy has been segmented into six priority areas and three driving enablers; our submission has been structured accordingly.

Priority Areas

Priority Area 1: Effective Restoration of Degraded Terrestrial, Inland Water, and Coastal and Marine Ecosystems

Proposed Australian Target: ***30% of priority degraded areas under effective restoration by 2030.***

What do you think of this target?

The NFF supports the notion of restoring degraded landscapes, however restoration action must not come to the detriment or expense of agricultural production. Degraded landscapes are often situated in farming areas with limited yet notable productive capacity and output. As such, the restoration of degraded agricultural landscapes risks compromising the availability of land for productive use and has the potential to create perverse socio-economic outcomes to the sector. These include but not limited to the following:

- Diminished capability to produce nutritious food and fibre for domestic and international consumers and potential to contribute toward safeguarding global food security;
- Diminished farm income earnings potential and business resilience; and
- Diminished regional employment opportunities.

It is also an important consideration that restoration measures involve a considerable time and capital cost at the expense of an individual primary producer and agribusiness. In recognition of these complexities, any intersection between restoration and agricultural land must be avoided where possible.

What additional action needs to occur for Australia to reach this target?

The achievement of this national target cannot rely on restoration measures alone, there exists a strong need for effective invasive species management. As published by the Terrestrial Ecosystem Research Network (TERN) in its annual *Australia's Environment 2023 Report*[1], invasive species followed by habitat loss, fragmentation, and degradation are the two principal key threatening processes to national biodiversity abundance. In recognition that habitat destruction is on a gradual decline relative to prior historical rates, a renewed shift in focus toward invasive species control and eradication is required. Action to mitigate the threat of invasive species will deliver the most value per unit of effort input with regards to halting national biodiversity decline and ensuring degraded landscapes are improved and ultimately restored.

Are you (or your organisation) taking action to contribute to the target? If so, what contributions are you making and which enablers are you using?

The NFF are partners with Farming for The Future (FFTF), a program initiated by the Macdoch Foundation with the aim of investigating the relationship between on-farm natural capital and farm business performance. The program is in the final stages of Phase 2 where fine scale financial, ecological, and social data was collected from 120 Australian livestock businesses via field surveys producer interviews, and remote sensing. The participating livestock farms were selected in regions across Victoria, New South Wales, Tasmania, and Western Australia. The data so far suggests that improved natural resource management is associated with higher gross margin and greater resilience to drought, market price and trade shocks.

Each participating farm in the project receives a detailed natural capital and financial report. The natural capital reports are created using a range of indicators that look at the structural characteristics of the farm, its position in the broader landscape, as well as biophysical aspects of the farm that are directly driven by management actions. The reports also contain some environmental performance indicators such as greenhouse gas estimates, carbon sequestration, and resource us efficiency estimates. The intent behind this is to provide farmers with a rich set of measures they can use to inform natural capital management decision-making and to support information needs in working with their supply chains.

In this initial phase of the project the broad range of indicators will allow the program to evaluate which work most effectively in the analysis. Allowing for refinement of the indicators to be used in future phases.

[1] https://www.wenfo.org/aer/wp-content/uploads/2024/03/2023_Australias_Environment_Report_March2024_spreads.pdf

Priority Area 2: Tackling the Impact of Invasive Species

Proposed Australian Target: ***Minimise the impact of invasive species on biodiversity in our most precious places by 2030.***

What do you think of this target?

Invasive species constitute a major threat to the natural environment as they threaten key biodiversity values and reduce native species abundance and species diversity across a range of ecosystems. Invasive species are a pervasive national problem of significant scale, action to minimise their impacts on biodiversity under the proposed target have been confined to 'precious areas' in Australia. It is the position of the NFF that as framed, the target does not recognise the urgency or importance of the need to eradicate invasive species at the national level. National eradication must remain at the forefront of ongoing policy ambition, with initial focus targeted toward areas of high biodiversity value. Language such as 'most precious places' lacks definitional clarity; it can be interpreted to encompass areas beyond that of high biodiversity value in conflict with the policy intent of the target and scope of the wider Strategy. As such, we propose that the target is amended to the following effect:

- '*Minimise the impact of invasive species on biodiversity in areas of high biodiversity outcomes, with an ultimate objective to achieve national eradication*'.

As previously articulated, invasive species are the greatest key threatening process to national biodiversity abundance. If Environment Ministers are committed to developing 'ambitious national biodiversity targets' and halting and reversing biodiversity decline as suggested, greater action beyond what is currently proposed is required. Each year, feral cats for example are estimated to kill approximately 1.8 billion species (equating to 2000 individuals a minute). Impacts are not confined to 'precious places' or areas beyond major population centres, this is evident as domestic cats, for example, kill 6,000 to 11,000 native animals per square kilometre in urban areas. Invasive species have nationwide impacts, this should be reflected in the target. Commitments to confront and mitigate predation must come with serious investment to deliver outcomes. It is recognised that there are a range of strategic mechanisms such as engagement strategies supported by coordinators. While these are well considered processes, they inherently lack sufficient investment to support actual on-ground intervention to reduce or eradicate numbers at sufficient scale.

What dedicated initiatives would you like to see for managing invasive species in Australia?

Invasive species are a pervasive and broad-reaching national problem, there exist a multitude of policy options to support their effective management:

Funding arrangements for invasive species control in National Parks by Commonwealth and State and Territory Governments should be strengthened and extended. Such funding provisions must be contingent control programs are undertaken in collaboration with private and other landholders. NFF have also been a longstanding advocate on the importance of R&D investment into developing emerging methodologies such as immunocontraception (genetic manipulation of offspring), biological control, and drone surveillance. Government should commit to establishing permanent initiatives that support such R&D action, including by ensuring the Centre for Invasive Species Solutions is

appropriately and ongoingly funded. NFF also sees value in new Government initiatives that provide funding for targeted research into the modification and translation of proven control techniques across different invasive species groups. For example, several deer-specific control techniques have been found successful for unmanaged goats. There exists much potential value in establishing such an initiative, if successful, this will ensure R&D costs and research timeframes are minimised, resulting in faster on-ground action. This also needs to come with a commitment to action. The stark example is how we continue to fail to intervene in the removal of carp despite a number of highly prospective alternatives being developed.

A comprehensive list of NFF recommendations to addressing invasive species was provided to the Minister for Environment in mid-2023 in response to an initial invitation to provide ambitious and innovative ideas to halt and reverse biodiversity decline. The submission is available at Attachment 1 and should be read in conjunction with the above section.

What do you think will increase community support for the need to control invasive species to avoid species extinctions?

The distribution of a clear-cut, to the point factsheet of the key impacts of invasive species on biodiversity, economic damages, and other sectors supported by an appropriate public media campaign delivered across several mediums (online and physical) is one of several mechanisms Government can utilise to increase community support for the need to control invasive species and avoid new species extinctions.

Priority Area 3: Building a Circular Economy and Reducing the Impact of Plastics on Nature

Proposed Australian Target: ***[Expand/grow/maximise/increase] the circularity of Australia's economy by 2030, to reduce the impact of pollution and habitat destruction.***

What do you think of this target?

This is an interesting area but still very nascent in development for the agricultural sector. While we do have a catchment scale 'pilot' (Bega Valley), there is still much to learn. Caution needs to be taken to ensure resilient and sustainable outcomes with a clear eye on appropriate landscape intervention that maintains or improves agricultural productivity, environmental resilience, and economic outcomes for communities of whatever scale. Addressing the drivers of habitat destruction such as predation by invasive species will play a critical role in this process.

Priority Area 4: Minimising the Impact of Climate Change on Nature

Proposed Australian Target: ***Embed climate change adaptation into decision-making by 2030, to support increased resilience of biodiversity.***

The proposed draft target seeks to increase the consideration of climate adaptation in all relevant decision-making through actions such as nature-based solutions to enhance the resilience and adaptive capacity of ecosystems and species, in recognition that existing measures will not be enough.

NFF support the practice and investment of nature-based solutions where they provide multiple co-benefits to biodiversity protection, climate sequestration and mitigation, food security, and enhanced business resilience. At the national level, Federal Government is supporting nature-based solutions through initiatives such as the National Soil Strategy and Australian Agricultural Sustainability Framework, a global-leading project that seeks to recognise biodiversity services from farmers.

Nature-based carbon offsets, specifically vegetative sinks, are likely to become the choice mechanism wielded by Governments. The intersection between offsets and agriculture is a point of concern to the NFF. Offsets in an agricultural landscape risk compromising the availability of productive land. Any mechanism must focus on less productive (or most suitable) land for establishment. Otherwise, offsets will create perverse social, economic, and environmental outcomes to the sector and natural environment.

Priority Area 5: Protect and Conserve 30% of Australia's Land and 30% of Australia's Oceans by 2030

Proposed Australian Target: ***Protect and conserve 30% of Australia's land and 30% of Australia's oceans by 2030.***

What factors should inform where we focus our efforts to achieve the 30% target on land?

This target cannot come at the expense of the loss of agricultural land. Agricultural land has already declined by 14% over the past 30 years. For Australia to maintain its exports globally and to by extension maintain food security both domestically and globally, this target cannot be met through purchasing agricultural land and converting it to protected area.

We note the Other Environmental Conservation Measures (OECM) process is still underway. NFF will consider its view of that as a pathway during the consultation period for OECM.

Protected Areas cannot lock away land from productive use and be left unmanaged. Unmanaged Protected Areas pose risks to farm production through pestilence, increased bushfire risk, and damaged infrastructure. If not appropriately resourced, Protected Areas can effectively become safe harbor breeding grounds for unchecked invasive species proliferation.

What do you consider the barriers and opportunities to reaching the 30 by 30 target?

Rather than being focused on rapid expansion to meet the 30% target, the Government needs to ensure that our existing protected areas are of high quality, managing invasive species and leading to genuine and representative biodiversity outcomes.

The National University of Singapore and the United Nations Environment Programme World Conservation Monitoring Centre (UNEP-WCMC) highlight that current efforts to ensure the effectiveness of existing Protected Areas lag far behind efforts to designate new Protected Areas. This means that expansion for the 30 by 30 target is prioritised over effectiveness of existing area, despite effectiveness being crucial for success. We should be prioritising quality Protected Areas not quantity.

Priority Area 6: Work Towards Zero New Extinctions

Proposed Australian Target: ***Work towards zero new extinctions.***

Where should efforts be focused to help meet this target?

Initial effort primarily should first be focused on effective data collection and monitoring. This will ensure progress toward delivering such a target can be appropriately, accurately, and routinely measured, and will help inform future priority actions. The work of Environment Information Australia (EIA) will be a key informant to these outcomes, trusted, accessible and appropriately protected data will be a key requirement of measuring, monitoring, and improving outcomes.

In working toward zero new extinctions, invasive species should be a key and persistent focus of ongoing Government effort. The impact of invasive species is immense as previously articulated. In recognition that primary producers are stewards of over half of Australia's land mass, there exists an opportunity for primary producers and farming families to be involved in and rewarded for undertaking action to protect threated species/ecological communities and manage invasive species (i.e., through culling, baiting, or other means). NFF recognises that DCCEEW is currently prioritising a fast-track delivery of five initial methodologies under the developing Nature Repair Market (NRM), one of which is a methodology for feral species control. NFF is supportive of this work and will continue our engagement. The development of such a method should create new funding avenues and incentives for landholders to further engage in invasive species control, ensuring on-ground action is broad-reaching and delivering win-win outcomes for both landholders and threatened species and ecological communities (IUCN Red List categories) facing material extinction risks. This methodology must be adequately and continuously resourced by Government to ensure there is significant uptake and driving action toward delivering this target as intended. NFF understands that Federal Government have preferred to sunset rather than extend existing methodologies under the Australian Carbon Credit Units Scheme, such decisions must not be allowed to manifest in the impending NRM.

What do you think will increase community support or actions to prevent species extinctions?

A target to work toward no new extinctions is a non-controversial goal that is likely to be supported in-principle by large elements of the Australian public. To further increase community support for actions that deliver on this target, co-benefits of species abundance to both the economy, industry, and local community needs to be clearly communicated. Building an appropriate level of public understanding and recognition of such benefits will naturally position the community toward supporting actions in this space.

Enablers

Enabler 1: Mainstreaming biodiversity considerations into government and business decision-making, including in financing, policies, regulations and planning processes

What are the current barriers, and potential solutions, to mainstreaming biodiversity considerations into decision-making across government, financial institutions, and business?

In line with national commitments and growing investor demand, Federal Government and the Australian Accounting Standards Board (AASB) have been consulting industry on the design and implementation of mandatory Climate-Related Financial Disclosure (CRFD) reporting requirements for a subset of applicable Australian businesses. NFF understands that while initial discussions regarding an Australian Sustainability Reporting Standard (ASRS) for nature and biodiversity have commenced, we remain unconvinced that the national economy is prepared for additional standards beyond what is currently being considered.

It is critical that Federal Government take the necessary time to establish, monitor, and refine (against review periods) reporting standards for CRFD before any consideration of nature-based disclosures in line with the TNFD is undertaken. Nature-based disclosures may play an important role in future risk management, decision-making, and policy design processes, it is prudent however, that the appropriate time is undertaken to properly establish the initial policy setting (especially considering the modular design of ASRS Standards by AASB (i.e., separate modules built upon a central architecture that being ASRS S1).

Enabler 2: Ensuring environmental data and information is widely accessible and supports planning

What are the current barriers to ensuring environmental data and information is widely accessible, and supports biodiversity protection planning?

NFF agrees that environmental data and information are critical for the effective protection of Australia's biodiversity and restoration of degraded systems. However, there do exist several barriers to ensuring such data and information is widely accessible and supports appropriate outcomes.

As previously articulated, EIA will play a critical enabling role in this process. Building trust is the first impediment toward data sharing, there also needs to be robust privacy agreements to ensure a free flow of information is possible. Considerations for appropriate incentives or reward structures to incentivise data sharing should also be a key priority, alongside effort to ensure data is consistent, comparable (i.e., speaks the same language), and easily accessible. The development of EIA will require communication between all levels of Australian Governments, this should not be a process undertaken through separate bilateral processes.

Enabler 3: Ensuring equitable representation and participation in decisions relating to nature, particularly for First Nations peoples

NFF recognises the role indigenous peoples have and continue to play in managing Australia's land resources including biodiversity conservation work undertaken in Indigenous Protected Areas. Utilising First Nations knowledge in land management are important attributes, they need to be viewed in collaboration and conjunction with a number of contemporary farming practices and mechanisms that are already contributing to sustainable and resilient landscapes.

Conclusion

The NFF appreciates the opportunity to provide a submission to the Department and provide strategic comment to guide the ongoing development of the six proposed national biodiversity targets. We look forward to further engagement and opportunity to contribute to this ongoing work. Please do not hesitate to contact Warwick Ragg, General Manager NRM via e-mail: WRagg@nff.org.au at the first instance to progress this discussion or to seek further clarification.

Yours sincerely,

TONY MAHAR
Chief Executive Officer

Attachments List

- **Attachment 1:** NFF Submission to Minister Plibersek: Invitation – Seeking Ambitious and Innovative Ideas pto Halt and Reverse Decline in Our Biodiversity

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National Farmers Federation

1 June 2023

Hon. Tanya Plibersek MP
Minister for the Environment and Water
Department of Climate Change, Energy, the Environment and Water
King Edward Terrace
Parkes ACT 2600

Via email: NRS.environment@dcceew.gov.au

Dear Minister Plibersek,

RE: Invitation: Seeking ambitious and innovative ideas to halt and reverse decline in our biodiversity

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the Department regarding innovative and ambitious ideas to halt and reverse the decline in Australian biodiversity as invited by Minister Plibersek.

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the length and breadth of the supply chain. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

As a general principle, the NFF seeks to ensure that any legislative reform does not have a perverse or adverse impact on agricultural productivity.

Overview

The NFF has innovative and ambitious ideas to halt and reverse the decline in Australia's biodiversity. Our submission specifically addresses Point 5 of the invitation, innovative ideas on how government and the private sector can work together to:

- *Deliver solutions to environmental challenges, such as **controlling feral species** and using of technology to track the health of our environment.*

Feral species constitute a major threat to the natural environment as they threaten key biodiversity values and reduce native species abundance and species diversity

across a range of ecosystems. Feral species degrade natural habitat through intensive or selective grazing and threaten native wildlife populations through interspecific competition, predation, and habitat modification. They also create billions in economic damages to the agricultural industry each year, and according to the Invasive Species Council, are the leading cause of native animal extinction.

As feral species are a pervasive problem across the entire Australian continent, it is the view of the NFF that significant improvement to biodiversity can be achieved through greater, wider encompassing, and stronger enforced feral species management control and impact mitigation activities on both public and private land. If the government is serious about addressing this problem, additional funding for mitigation activities in existing national management plans coupled with the development of new public-private partnerships is required. Developed strategies that complement and support this vision are detailed below.

NFF Developed Strategies

Nature Repair Market Bill – Methodology Determination

Feral pigs are a major problem in Australia. Recently, while executing a feral pig cull via helicopter, one of our constituents managed to cull 259 feral pigs in less than 4 hours on his private property in NSW. This was an increase in 79 pigs from the previous culling event conducted two months earlier. As most feral pigs that were culled originated from neighbouring private land estates, and these landholders were unwilling to participate in control activities due to a combination of high-cost inputs and limited government funding support, this showcases the importance of economic incentives for driving meaningful action in this space.

In recognition of the impacts caused by feral species, Minister Plibersek stated in her speech to Parliament when introducing the *Nature Repair Market Bill* that the Bill will encourage good environmental work that protects and repairs nature like feral species management on private land[1].

As many farmers and private landholders want to engage in feral species control but do not have the appropriate funds to execute such programs, the NFF would like to propose that any form of feral species control (i.e., shooting, baiting, dog hunting) undertaken by eligible project proponents under the current iteration of the Bill be deemed a biodiversity project and covered by a methodology determination made by the Minister. This action will ensure alignment with the

[1] https://minister.dcceew.gov.au/plibersek/speeches/speech-introducing-nature-repair-market-bill

overall outcome of the *Nature Positive Plan* and provide a viable economic incentive for private landholders to undertake land management activities that support feral species control to improve biodiversity outcomes. It will also send a clear policy signal to landholders who have refrained from engaging in such activities due to the existing high cost-to-barrier entry that such action will be rewarded, guaranteeing a significant uptick in such activity. As a direct co-benefit of feral species control is an improvement to overall biodiversity outcomes, this action will have a significant positive impact for nature and arrest the current decline in biodiversity.

Additional Funding for National Park Management

The NFF would also like to propose that additional funding for feral species management control in national parks be allocated and appropriated by Commonwealth as well as state and territory governments. Such funding provisions must be contingent on a mutual agreement that such funds are spent to advance this purpose and that control programs are done in collaboration with private and other landholders. Currently, due to the large size and scale of national parks, such areas are rarely managed and often become a safe harbour for feral species populations. Two emerging control methods that would greatly benefit from additional funding in this space are genetic control and aerial drone technology.

1. Genetic technology can be strategically utilised to manipulate the offspring of feral species populations to be of one sex. If used effectively and with dedication, this can be used to control the spread of feral species, especially in remote areas with established populations.
2. Drone technology is a cost-effective method to conduct surveillance on feral species in remote and inaccessible locations and can be used to complement more direct existing control methods tailored towards feral species capture and removal.

Extending First Nations Joint-Management Over National Parks

The NFF would also propose that joint land management responsibility shared between state governments and First Nations communities for national parks be extended. While adhering to existing state government management plans, this would ensure that tested traditional Aboriginal land management techniques for controlling feral species (i.e., cultural fire) are recognised and implemented across a wider array of national parks. If implemented, this action will guarantee some level of feral species management control is occurring in national parks that have historically received limited funding allocations, resulting in improvements to

overall biodiversity, feral species control, and a strengthening in First Nations-government relations.

Feral Cats

According to the CSIRO, feral cats kill approximately 1.8 billion Australian animals (reptiles, frogs, birds, and mammals) each year, equating to 2000 native individuals every minute[2].

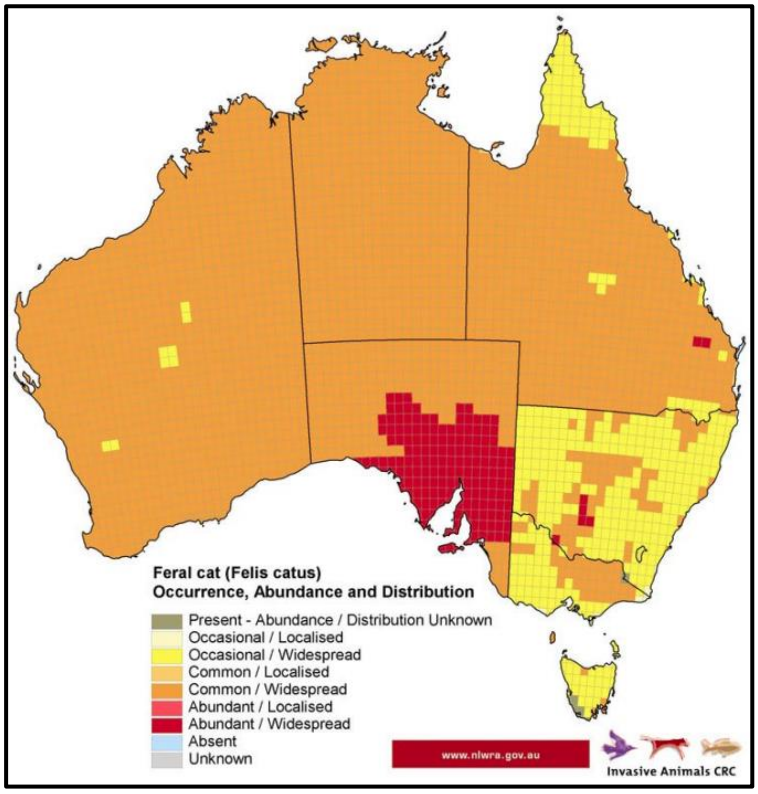

Figure 1: Feral cat occurrence, abundance, and distribution across the Australian continent as published by DCCEEW[3].

As feral cats are pervasive and well established across the Australian continent **(Figure 1),** eradication efforts are unfeasible and near impossible unless the affected land area has clear delineated boundaries (i.e., an island). Management activities should be targeted towards containment and control, and these include:

[2] https://www.csiro.au/en/news/all/articles/2022/june/feral-cats-gene-drive
[3] https://www.dcceew.gov.au/environment/invasive-species/feral-animals-australia/feral-cats

- The eradication or control of cats on offshore islands of high, or potentially high, biodiversity value.
- The expansion and creation of new feral-free areas across a range of ecosystems across the entire continent, with particular focus given to priority areas in South-Eastern Australia.
- A reduction in barriers for responsible domestic cat ownership with state and local council programs to support desexing, registration, and microchipping for domestic cats, as well as night curfew and containment programs, particularly in areas of high identified biodiversity value.
- Ensuring broad-scale toxic baits targeting feral cats are developed, registered and available for use across all of Australia rather than being limited to specific state jurisdictions (i.e., Curiosity® bait is only for use in Western Australia).
- A continuation of research into understanding interactions between feral cats and other predators: **(i)** in different landscapes; and **(ii)** any potential beneficial/perverse outcomes if other predator populations are modified.
- Re-investigate diseases and other potential biocontrol agents, biotechnology and immunocontraceptive options for cats, and commence research on promising options. Undertake social research on promising options to gauge community support.
- Ensuring efficient systems of control. Example: Victoria requires feral cats to be trapped then surrendered this as it is cost prohibitive and inefficient.

Feral Deer

Until more cost-effective tools are rendered available, preventing the spread of existing feral deer populations, and eradicating isolated incursions is the most feasible approach to managing the national feral deer problem. In reference to the National Feral Deer Action Plan, the NFF would like to propose that the following ideas and solutions from the plan be implemented.

- Create a national feral deer containment buffer zone aimed to stop the establishment of large populations in Eastern Australia.
- Control and eradicate small populations beyond the containment zone and in peri-urban areas before they become established in the landscape.
- Control priority feral deer populations in the current distribution range, primarily through intensive ground and aerial culling to stop population growth in complement with baiting and thermal surveillance technologies.
- Conduct extensive surveillance and develop new site management plans to reduce the current or future impact of deer in areas of national and

international environmental significance including Ramsar wetlands, National Heritage, and World Heritage areas.

Carp

In the National Carp Control Plan (NCCP), the Australian Government announced $15.2 million in funding to investigate the feasibility of the Cyprinid herpesvirus 3 (virus) as a biological control agent for common carp. While the NFF recognises that the review of technical papers submitted to the NCCP are ongoing, we would like to see the results of this investigation actioned immediately and with priority. If the biological control agent is found effective, the NFF requests that the Federal Government allocate additional funding to support the introduction and widespread adoption of this biological release program, with problematic areas given immediate priority.

Feral Dogs

In reference to the National Wild Dog Action Plan, the NFF proposes the following be prioritised:

- Identify research, development, and extension (RD&E) opportunities to improve best practice wild dog management.
- Recognise, support, and facilitate the development of best practice wild dog management initiatives with new and existing community groups in potential impact areas.
- Provide funding to support the application and widespread adoption of the PAPPutty® lethal trap device following successful APVMA assessment.

Feral Pigs

In reference to the National Feral Pig Action Plan, the NFF would like to propose that the following priorities from the plan be implemented:

- Establish demonstration sites for new feral pig management control options and report outcomes.
- Raise awareness and drive adoption of new, humane feral pig management and monitoring technologies by land managers.
- Develop strategic approaches to protect prioritised assets through active suppression, or eradication, of feral pig populations.
- Establish a feral pig coordinator network to support existing management groups.

- Establish a nationally recognised, standardised, and accredited training program for feral pig best practice management to operate alongside a network of accredited trainers to deliver training programs for land managers.

Rabbits

In reference to the Rabbit Biocontrol Plan released by the Centre for Invasive Species Solutions, the NFF proposes that additional funding be provided to support research and development into the potential of the *Rabbit haemorrhagic disease virus* (RHDV2) to become a registered biocide control agent. Funding allocations should focus on building an enhanced understanding of the interplay between rabbit interaction and evolution to the virus and optimal-use scenarios. Other solutions include:

- Identifying regional priority areas for rabbit control by focussing effort on areas where rabbits have the greatest impact on threatened species and/or ecological communities.
- Timely strategic release on control measures.
- Establishing new economic incentives for land managers to engage in strategic landscape-scale approaches to control programs.

Blackberry

The NFF would like to propose that the following priorities be implemented to arrest the decline in biodiversity caused by the Blackberry weed:

- Provide additional funding to support greater adoption of *Phragmidium violaceum*, a biological control agent used to prevent Blackberry from producing daughter plants.
- Raise awareness of new and existing chemical control methods that can be used to treat and control Blackberry (i.e., herbicides).

African Lovegrass

The NFF would like to propose that the following priorities be implemented to arrest the decline in biodiversity caused by the weed, African lovegrass:

- Provide additional funding measures to support existing national research projects to develop a commercially viable biological weed control agent.
- Work with state jurisdictions to establish a national framework detailing best-practice preventative measures. Example: A requirement that any

fodder, stock, soil or produce that has been purchased are free of weed seeds.

Summary

The NFF thanks the Minister for the opportunity to provide a submission. We look forward to further engagement on this important issue. The policy contact for this matter is Warwick Ragg, General Manager (Natural Resource Management) via e-mail: WRagg@nff.org.au or phone (02) 6269 5666.

Yours sincerely,

TONY MAHAR
Chief Executive Officer