

“Together, create and apply solutions”

Invasive Animals Cooperative Research Centre

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Secretariat – Independent Review of the EPBC Act 1999
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Dear Dr Hawke and Expert Panel,

Thank-you for giving the Invasive Animals Cooperative Research Centre (IA CRC) this opportunity to contribute to the EPBC Act review. We recently held a national workshop on ‘Risk assessment processes for import and keeping of exotic vertebrates in Australia’, and believe the findings of the workshop are of direct relevance to the review.

The workshop’s primary aim was to produce recommendations for an improved system for regulating the import and keeping of live exotic animals in Australia, to ensure we are adequately protected from new pest incursions.

Representatives attended from the Australian Government Department of the Environment, Water, Heritage and the Arts (DEWHA; from Exotic Species Regulation and Environmental Biosecurity), Department of Agriculture, Fisheries and Forestry (from Bureau of Rural Sciences, Biosecurity Australia and Sustainable Resource Management), and from each state and territory government (primary industry and environment departments). Participants also included members of the Vertebrate Pests Committee (VPC), Murray-Darling Basin Authority, Australasian Regional Association of Zoological Parks and Aquaria, and the IA CRC. New Zealand’s Department of Conservation and Environmental Risk Management Authority were also represented.

The group acknowledged that there are substantially different approaches used by different jurisdictions for assessing risks of animals proposed for live import. These differences cause inefficiencies, inadequacies and confusion in risk assessment processes. Questions and doubts were raised concerning transparency and robustness of the live import process, and whether risk mitigations put in place (such as the containment levels for high-risk animals) were adequate.

The group acknowledged there are difficulties associated with separation of powers, clarity of roles, and impacts of input from different agencies and lobby groups. There was particular frustration expressed from state agencies that final decisions by DEWHA and the federal Minister to import exotic animals may go against the majority of jurisdictional recommendations. It was acknowledged that risk assessments only form part of the overall import decision process. **However, once a species is allowed in, it becomes a risk mitigation issue for state governments rather than a risk assessment issue, so it is important to be clear on state input into the conditions of its import.**

The participants acknowledged DEWHA’s recent improvements in consultation processes for importing live exotic species (they have set up a GovDex site and contact list) and recommended further refinements to aid in communication between all stakeholders. The forum also recommended moving towards harmonising exotic species policies and supporting legislation.

Of particular concern to the majority of participants was the current use of information provided by the import applicant in DEWHA’s risk assessment process. There was consensus, with the exception of DEWHA, that using information from an applicant’s assessment may compromise final risk assessment decisions, leading to the import of harmful species, and loss of credibility of the assessment process. **It was recommended by all attendees that the EPBC Act should allow DEWHA to appoint an independent expert, paid for by the applicant, to conduct a full scientific**

risk assessment. In this way, the integrity of the process would be upheld and duplication of risk assessments by different jurisdictions could be avoided.

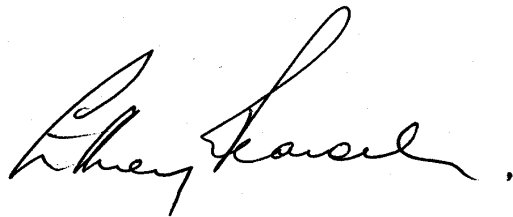
There is no nationally agreed process for the determination of policy on the importation of animals with the potential to adversely impact the environment or social well being. Consequences of ignoring this issue include ineffective use of resources and an unclear national policy position on an acceptable level of protection. The group recommended the development of a nationally agreed policy determination process and an agreed implementation process to inform decision making. **It was agreed a path forward could be for a working group (with VPC and DEWHA) to recommend national policy options with a view to having regulations incorporated under the EPBC Act. The VPC Guidelines for Importing and Keeping Exotics (May 2004) could inform such regulations.**

In summary, key recommendations of the workshop include:

- a single risk assessment system, each species assessed once, by accredited, independent assessors paid for by the applicant
- improved communication between DEWHA and jurisdictional agencies, particularly on the consideration of input from state risk assessments
- agreed levels of security needed for assigned threat categories
- agreed standards for secure facilities and auditing of these facilities.

If you need any further information on the workshop, please do not hesitate to contact Dr Wendy Henderson of our Detection & Prevention Program (wendy.henderson@invasiveanimals.com).

Yours sincerely,



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Chief Executive
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