



NATIONAL PARKS ASSOCIATION OF THE ACT INC.

Pest Animals

c/- Environment Division, Environment, Planning and Sustainable Development Directorate

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[Via ACTBiosecurity@act.gov.au](mailto:ACTBiosecurity@act.gov.au)

## **Submission on Proposed amendments to the Pest Plants and Animals (Pest Animals) Declaration Discussion paper**

The National Parks Association of the ACT (NPA ACT) welcomes the release of the Discussion paper for the Proposed Amendments to the Pest Plants and Animals (Pest Animals) Declaration (the Declaration) and the opportunity to comment on its content.

The NPA ACT is a community-based conservation organisation with more than fifty-nine years of working to protect our natural environment through an active outings and work party program; participation in Parkcare activities; an extensive publication program; public meetings and conferences and engagement with government policies and programs. Given the potential negative impacts that invasive animals and pests can have on the environment, this is an area that the NPA ACT has always maintained an interest in.

### **General comments on the Proposed Amendments**

The NPA ACT is most interested in the natural environment and the creation and management of conservation reserves. Many species listed in the tables of the Proposed Amendments are of interest to animal keepers, and this is an area of little interest to the NPA ACT unless these species escape from captivity and establish a population in the wild.

The NPA ACT agrees with the aim of the Declaration to make ACT Legislation consistent with NSW Legislation. Many species listed in the Declaration are existing pests in the ACT. However, the listing of those species known to be invasive, or those that have recently been detected as introduced animals in NSW and ACT is commended by the NPA ACT, as this allows a proactive approach to any additional arrivals of those animals.

### **Specific comments on the Proposed Amendments**

Table 2 lists 6 species of wild deer that are already declared as pests, which are not declared as exempt animals under s 155 of the *Nature Conservation Act 2014* and so require a licence to be kept, sold, imported into or exported from the ACT. Deer are valued as game animals by hunters, and are likely to be “seeded” into new areas. However, it is unclear whether any legislation in ACT prevents these animals being trapped, transported and released within ACT. Deer are already numerous in the ACT and observations by our members show that deer are already having a significant impact of some plant species in Namadgi NP, such as Woolly bitterbush *Adriana tomentosa*, and even are significant browsers of spiny plants such as *Bursaria spinosa*.

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Wild rabbits and wild pigs have been considered serious pests across all tenures (in conservation reserves and agriculture) for many years. However, there appears to be no regulation insisting that these two species are subject to pest management activities. In NSW, these two species are subject to Pest Control Orders that include a general destruction obligation. If this Declaration is to align ACT legislation with that of NSW then these two species should have some requirement that all landholders continue destruction of these pests. While the ACT Parks Conservation Service PCS controls large areas of ACT and may consider that such a regulation is onerous, they are already take action on these pests. Rural landholders may have conditions on leases requiring control of these two pests, but a general requirement for control across the whole of the ACT is a powerful education tool to inform the public that these two serious pests can never be ignored.

In Table 5, there are many species proposed for pest declaration. Some are already well established in ACT, while others are potential serious invasive species. These proposed declarations are a useful education tool to make the general public aware that some of these species, while commonly occurring in our urban areas are in fact pests. The declaration of Indian myna/Common myna as pests would be good support for the volunteer community group that has worked vigorously to suppress this species in ACT. The NPA ACT supports the proposed declaration of these species listed in Table 5.

Other species that should be listed in Table 5 are rainbow trout, brown trout, redfin and carp. These are well established species in ACT but valued as sport fish. However, the impacts on native species of these introduced and naturalised fish are well documented. It would be useful education tool to have these four fish species also declared as pests.

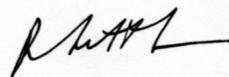
The NPA ACT has been pleased to contribute comments to this discussion paper, and awaits the formal public consultation process.

Should you require any further information regarding the NPA ACT's input, please do not hesitate to contact the NPA ACT office, attention of Mr Rod Griffiths, Convener, NPA ACT Environment Sub-committee.

Yours sincerely



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