

A. Entity responses

As mandated in section 64 of the *Auditor-General Act 2009*, the Queensland Audit Office gave a copy of this report with a request for comments to the Department of Agriculture and Fisheries. We also provided a copy to the Department of Environment and Science and all 77 councils and gave them the option of providing a response.

This appendix contains the detailed responses we received.

Following the response from the Department of Agriculture of Fisheries, the Queensland Audit Office prepared, and has included in this report, further correspondence to the department.

The heads of these entities are responsible for the accuracy, fairness, and balance of their comments.

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Comments received from Chief Executive Officer, Sunshine Coast Regional Council



23 June 2023

Queensland Audit Office
53 Albert Street
BRISBANE QLD 4000

Email: [REDACTED]

Re: Comments on proposed report - *Managing invasive species*

I refer to the email from the Auditor-General dated 2 June 2023 inviting feedback on the proposed report *Managing invasive species*, which the Auditor-General is proposing to finalise and table in the Legislative Assembly in late June / early July 2023.

Generally, Council is supportive of the report findings and recommendations and encourages active and well-planned coordination and investment in invasive pest management by Biosecurity Queensland. The recommendations for a risk and data driven approach to invasive pest management are also welcomed.

As you would be aware, all councils have an obligation under the *Biosecurity Act 2014* to regulate biosecurity risks and provide appropriate controls and processes. The *Sunshine Coast Council Local Government Area Biosecurity Plan 2017* – which can be accessed at <https://assets-us-01.kc-usercontent.com/c631baf8-1b46-001f-580c-d0001b68b4a8/7cdb8de1-4732-4bb2-bc19-71bca0ac3c5b/024C058D-5769-42F4-AFB9-FFBE4230B9B2> - provides a detailed action plan supporting Council's ongoing commitment to meet Councils obligations under the Act.

The proposed report has a strong focus on the overall performance of the biosecurity system in relation to the management of invasive species, within the context of:

- Leadership and coordination
- Assessing and mitigating Risk
- Data usage – informing decision making
- Regulating risk

Many of the findings and recommendations in the proposed report represent improvements to the biosecurity management system, including opportunities to enhance the support provided by the Department of Agriculture and Fisheries (DAF) to local governments in discharging their responsibilities, setting strategic priorities and prioritising funding. Our Council recognises and supports the intent to enhance leadership and coordination of biosecurity planning, management and delivery in the management of invasive species. Equally, our Council welcomes a more visible and focussed role for DAF in stakeholder

T 07 5475 7272 E mail@sunshinecoast.qld.gov.au
Locked Bag 72 Sunshine Coast Mail Centre Qld 4560
sunshinecoast.qld.gov.au

Caloundra 77 Bulcock Street Caloundra Qld 4551
Maroochydore Sunshine Coast City Hall
54 First Avenue Maroochydore Qld 4558
Nambour Cnr Currie and Bury Streets Nambour Qld 4560

leadership, engagement, awareness, coordination, funding support and training between Biosecurity Queensland and the Department with councils and other stakeholder groups

It is in this context, that Council would like to put forward for the consideration of the Queensland Audit Office, the potential to strengthen and clarify proposed Recommendation 5, to also include:

- the expansion of DAF's advisory services to local governments to specifically include advice on retaining the contemporary nature of local government biosecurity plans and
- mechanisms to enhance the timeliness of DAF's review of local government biosecurity plans.

Thank you for the opportunity to provide feedback on the proposed report and should your office require any further information or clarification of the matters outlined above, please do not hesitate to contact

Yours sincerely



Emma Thomas
Chief Executive Officer



Comments received from Director-General, Department of Environment and Science



Department of
Environment and Science

Our Ref: CTS 10227/23

22 June 2023

Mr Brendan Worrall
Auditor-General
Queensland Audit Office
PO Box 15396
CITY EAST QLD 4002

Dear Mr Worrall

Thank you for your email of 2 June 2023 regarding the Managing Invasive Species proposed report (the Report), developed by the Queensland Audit Office (QAO).

I understand that representatives from both of our organisations worked together throughout the drafting of the Report. I would like to thank QAO for their engagement throughout the process and for the inclusion of the case study that showcases the important work that the Department of Environment and Science (DES) is doing to protect endangered species at Astrebla Downs National Park and Taunton National Park (Scientific) in the management of feral cats.

DES recognises that pest management is a shared responsibility of all landowners and partners. As the Department of Agriculture and Fisheries (DAF) is the primary state department responsible for managing biosecurity and invasive species in Queensland, DES is committed to working with DAF in the implementation of the recommendations of the Report where there are shared interests between DES and DAF.

DES has no specific comment on the Report and recommendations and will continue to prioritise pest management in our work programs.

Should your officers require any further information, they may contact [REDACTED]

Yours sincerely

Jamie Merrick
Director-General

cc [REDACTED]

1 William Street Brisbane
GPO Box 2454 Brisbane
Queensland 4001 Australia
Telephone + 61 7 3338 9304
Website www.des.qld.gov.au
ABN 46 640 294 485

Comments received from Director-General, Department of Agriculture and Fisheries on 26 June 2023



Department of
Agriculture and Fisheries

Our ref. CTS 11653/23

26/06/2023

Mr Brendan Worrall
Auditor-General
Queensland Audit Office
qao@qao.qld.gov.au

Dear Mr Worrall

Thank you for your email of 23 June 23 requesting an update to my response to the proposed QAO report "*Managing Invasive Species*" sent to your office on 22 June 2023.

I note an additional recommendation has been added to the proposed report in relation to reviewing the *Biosecurity Act 2014* (the Act). Let me reiterate my comments in my letter of 22 June 2023 with some amendments and add some additional comments about the recommended review of the *Biosecurity Act 2014*.

As noted in my previous letter, the proposed report takes a narrow view of biosecurity as just managing weeds, feral animals and tramp ants in Queensland without taking a holistic consideration of the bigger picture of the National Biosecurity System across all of the exotic pests and diseases that threaten agricultural industries and the environment.

I also noted in my previous letter that the Queensland Biosecurity System does not exist in isolation and even within Queensland, the management of invasive species, involves a number of Government entities along with Local Governments and the broader community. The Intergovernmental Agreement on Biosecurity between the Federal, State and Territory Governments aimed to strengthen the national biosecurity system. It defines the roles and responsibilities of governments and outlines the priority areas for collaboration to minimise the impact of pests and diseases on Australia's economy, environment and community.

The proposed QAO report espouses a model of leadership which is inconsistent with the modern biosecurity system approach that looks for the creation of an authorising environment and collaborative partnerships.

1 William Street Brisbane
GPO Box 48 Brisbane
Queensland 4001 Australia
Business Centre 13 25 23
Website www.daf.qld.gov.au
ABN 66 934 348 189

In relation to the additional recommendation, the Act was comprehensively reviewed in 2019 (2019 Act Review) in consultation with key industry stakeholders including Local Government and the Local Government Association of Queensland. The 2019 Act Review was undertaken within three years of the Act's commencement as required by s501 of the Act.

The 2019 Act Review and its recommendations are published at <https://www.daf.qld.gov.au/business-priorities/biosecurity/policy-legislation-regulation/review-of-the-biosecurity-act-2014>.

Some 2019 Act Review recommendations were actioned in the *Agriculture and Other Legislation Amendment Act 2020*. Certain other recommendations, not requiring a Regulatory Impact Statement (RIS), are currently progressing through normal legislative amendment processes.

The outstanding recommendations from the 2019 Act Review require further consideration and/or public consultation prior to a final decision being made by Government on whether those recommendations will be progressed.

DAF will progress this recommendation in conjunction with the next review cycle for the Biosecurity Regulation 2016 currently scheduled for 2026.

My specific responses to the eight recommendations are provided in the attached Appendix 1 on the QAO template provided.

In closing, and as stated in my earlier letter to you, we appreciate the work undertaken by the QAO to improve the performance of the department in relation to the management of invasive species. In that spirit of improvement, I suggest that future performance audits on this topic may be strengthened by inclusion of independent subject matter expertise with biosecurity experience to complement the audit teams.

If you require any further information, please contact [REDACTED]

Yours sincerely



Dr Chris Sarra
Director-General
Department of Agriculture and Fisheries

Enc. Appendix 1: Revised DAF response to QAO report "Managing Invasive Species".

Responses to recommendations



Department of Agriculture and Fisheries

Managing invasive species

Response to recommendations provided by Dr Chris Sarra, Director-General, Department of Agriculture and Fisheries on 26 June 2023.

Recommendation	Agree/Disagree	Timeframe for implementation (Quarter and financial year)	Additional comments
<p>Strengthening biosecurity system leadership and coordination</p> <p>We recommend the Department of Agriculture and Fisheries:</p> <ol style="list-style-type: none"> strengthen its leadership and coordination role for the biosecurity system by setting strategic priorities, prioritising funding, and coordinating and overseeing activities across Queensland (Chapter 4). 	Agree	<p>Q2 2023/24 (Revision of Queensland Biosecurity Strategy for Premier's consideration)</p> <p>Q3 2023/24 (Review of DAF's leadership, consultation and partnership arrangements)</p>	<p>DAF is currently working with key stakeholders to revise the Queensland Biosecurity Strategy. A major tenet of the Australian and Queensland biosecurity system is "biosecurity is a shared responsibility". A stakeholder writing team is currently drafting and will develop action plans in coming months.</p> <p>DAF will review its leadership, consultation and partnership arrangements and structures including the Terms of Reference (TOR) and DAF's role in stakeholder committees within the Biosecurity System. These committees and arrangements include the State Land Pest Management Committee (SLPMC), State Oversight Group, Queensland Invasive Plants and Animals Committee (QIPAC) and the Queensland Dog Offensive Group (QDOG).</p>
<p>Strengthening biosecurity system leadership and coordination</p> <p>We recommend the Department of Agriculture and Fisheries:</p> <ol style="list-style-type: none"> reviews the <i>Biosecurity Act 2014</i> in consultation with stakeholders, to ensure it has the necessary clarity, authority and responsibility to effectively and efficiently lead, coordinate and enforce Queensland's biosecurity system (Chapter 4). 	Agree	<p>Q3 2024/25 (Progression of outstanding recommendations from the 2019 Act Review that require further consideration and/or public consultation)</p> <p>Q1 2025/26 Further review of <i>Biosecurity Act 2014</i></p>	<p>The <i>Biosecurity Act 2014</i> was comprehensively reviewed with key industry stakeholders including Local Government and the Local Government Association of Queensland in 2019. That review was undertaken within three years of its commencement of the Act, as required by s501 of the <i>Biosecurity Act 2014</i>.</p> <p>The 2019 Act Review and recommendations are published at: https://www.daf.qld.gov.au/business-priorities/biosecurity/policy-legislation-regulation/review-of-the-biosecurity-act-2014.</p> <p>Some necessary recommendations were actioned in the <i>Agriculture and Other Legislation Amendment Act 2020</i>.</p> <p>Certain other recommendations, not requiring a Regulatory Impact Statement (RIS) are currently progressing through the normal legislative amendment processes.</p>

Recommendation	Agree/ Disagree	Timeframe for implementation (Quarter and financial year)	Additional comments
			<p>The outstanding recommendations from the 2019 Act Review require further consideration and/or public consultation prior to a final decision being made by Government on whether they will be progressed.</p> <p>DAF will progress this recommendation in conjunction with the next review cycle for the Biosecurity Regulation 2016 currently scheduled for 2026.</p>
<p>Designing an effective strategy</p> <p>We recommend the Department of Agriculture and Fisheries:</p> <p>3. review, update and implement the <i>Queensland Invasive Plants and Animals Strategy 2019-24</i> (Chapter 4). The strategy should:</p> <ul style="list-style-type: none"> • identify the current and future challenges and priorities facing Queensland’s biosecurity system and provide practical solutions to address these challenges • clearly define Biosecurity Queensland’s role in relation to leading the biosecurity system, including co-ordinating and working with councils and stakeholders responsible for managing established invasive species • include indicators of success to measure performance across the biosecurity system – these measures should be cascaded to all key stakeholders including councils • better align to the Department of Environment and Science’s Biodiversity Conservation Strategy. 	<p>Agree</p>	<p>Q2 2023/24 (Sep – Dec 2023 review of current IPAS)</p> <p>Q4 2023/24 (Mar – June 2024 public consultation of revised QIPAS)</p> <p>Q2 2023/24 (July – Sep 2024 adoption of revised QIPAS strategy)</p>	<p>The Queensland Biosecurity Strategy is currently under revision with expected release in Q3 2023/24.</p> <p>A review of the Queensland Invasive Plants and Animals Strategy 2019-24 will commence once the Queensland Biosecurity Strategy is finalised.</p> <p>DAF will renew the Queensland Invasive Plants and Animals Strategy for release during 2025 to include key performance indicators (KPI) in line with the Queensland Biosecurity Strategy and the “Conserving Nature – A Biodiversity Conservation Strategy for Queensland 2022”.</p> <p>DAF will work with DES to develop KPIs for invasive species management consistent with the performance measures for biodiversity conservation.</p> <p>DAF will investigate whether certain other arrangements are necessary to give effect to a cascade of performance measures to other stakeholders and local governments such as amendments to the <i>Biosecurity Act 2014</i> to</p> <ul style="list-style-type: none"> • establish a mandatory requirement for local government biosecurity plans to contain KPI for each local strategy to manage invasive plants and invasive animals and/or • establish a mandatory annual reporting relationship from local governments to DAF for state or local government determined performance measures or KPIs.

Recommendation	Agree/ Disagree	Timeframe for implementation (Quarter and financial year)	Additional comments
<p>Using data to inform decision making</p> <p>We recommend that the Department of Agriculture and Fisheries:</p> <p>4. improve the accuracy and level of detail it records about invasive species, their risk, and the activities it does to manage them (Chapter 4). This should include:</p> <ul style="list-style-type: none"> determining if the Biosecurity Online Resources and Information System has the required functionality regularly auditing and reporting on the quality, completeness, and accuracy of data in the Biosecurity Online Resources and Information System developing processes and measures for analysing its data for trends using its data in making decisions about how best to manage invasive species. 	<p>Agree</p>	<p>Q1 2023/24 (Rolling program of enhancements to BORIS as need identified)</p>	<p>DAF will implement the identified priority activities in the updated Queensland Invasive Plants and Animals Strategy subject to normal budgetary constraints.</p> <p>Biosecurity Online Resources and Information System (BORIS) is an internal system to aid Biosecurity Queensland administer aspects of its regulatory functions under its legislation portfolio, it is not a specific invasive species management tool or data repository or data analysis tool and is used across all biosecurity Queensland programs.</p> <p>Biosecurity Queensland has a rolling program to make functionality enhancements to BORIS and its various modules. Changes to functionality can be scoped and delivered at the request of any Biosecurity Queensland program area which identifies a need for an enhancement.</p> <p>BORIS is just one of the information systems and analytical tools used to support evidence-based decision-making. Biosecurity Queensland also uses nationally agreed applications such as CLIMATCH as part of risk profiling and decision-making using data held in national and global data invasive species data repositories.</p> <p>The Atlas of Living Australia (ALA) and the Global Biodiversity Information Facility (GBIF) are the national and global repositories for invasive species distribution data.</p> <p>DAF, other government agencies and citizen scientists provide invasive species locational data to those data repositories. DAF does not seek to duplicate those data repositories within BORIS.</p> <p>DAF curates a number of spatial data sets associated with pest species distribution and abundance. These data sets are made available through Whole of Government Open data policies and the Department has also created dashboards for external parties to support pest prioritisation and evaluation of management effort.</p>



Recommendation	Agree/ Disagree	Timeframe for implementation (Quarter and financial year)	Additional comments
<p>Assessing and mitigating the risk of invasive species</p> <p>We recommend the Department of Agriculture and Fisheries:</p> <p>5. develop and implement a framework for assessing and mitigating the risk of new and established invasive species (Chapter 4). The framework should include:</p> <ul style="list-style-type: none"> • an approach for regularly assessing, prioritising, and mitigating the risk of invasive species • protocols for communicating the risk of invasive species and any changes in approach to managing those risks, to relevant stakeholders. 	<p>Agree</p>	<p>Q4 2023/24 (scoping of developing and implementing of framework)</p> <p>Q4 2024/25 (Publishing documentation and tools)</p>	<p>DAF will refine the risk assessment and prioritisation processes and tools developed by DAF and previously made available to Queensland local governments in partnership with the Local Government Association of Queensland (LGAQ). These documents and tools will be published on the DAF website once redrafted to meet current web access publishing guidelines.</p> <p>DAF will use the same risk assessment and prioritisation tools, as provided to local government, to provide regular revisions of the risk profiles of the invasive biosecurity matter which are a local government responsibility.</p> <p>DAF will develop protocols for communicating changes in risk profiles to all relevant stakeholders including local governments.</p> <p>DAF notes that there are more than 1000 invasive plants and invasive animals, and about the same number of species of noxious fish or invasive ornamental fish. DAF has not yet scoped the resources and timelines required. However, it may take some considerable time and extra resources to affect a full review of all required risk profiles.</p> <p>DAF will also undertake a review of all invasive plants and invasive animals (including noxious fish) currently listed as restricted matter or prohibited matter in the <i>Biosecurity Act 2014</i> to determine whether the risk profiles and mitigation measures continue to require a legislative listing.</p> <p>The Queensland Government is partnering with other stakeholders in the development of Biosecurity Commons, a platform that host a suite of tools that will deliver a cloud-based decision-support platform for modelling and analysing biosecurity risk and response of invasive plants and animals.</p>

Recommendation	Agree/ Disagree	Timeframe for implementation (Quarter and financial year)	Additional comments
<p>Regulating the risk of invasive species</p> <p>We recommend the Department of Agriculture and Fisheries:</p> <p>6. provide greater education and awareness to local councils about how they can use the powers of the <i>Biosecurity Act 2014</i> to regulate the risk of invasive species (Chapter 4). This should include:</p> <ul style="list-style-type: none"> educating local councils on when and why they should issue biosecurity orders sharing better practice learnings about how local councils are regulating the risk of invasive species and the outcomes. 	Agree	<p>Q4 2023/24</p> <p>Develop and deliver a dedicated education and awareness package for elected councillors.</p> <p>Q4 2023/24</p> <p>Develop and deliver dedicated training package focusing on Local Government Chief Executive Officer powers, roles and responsibilities.</p> <p>Q1 2023/24</p> <p>Continue to deliver training to local government appointed "authorised persons" on powers, roles and responsibilities.</p>	<p>DAF intends to continue to partner with LGAQ on how to best provide training packages for Biosecurity Best Practice Regulation to local government elected members, senior management and staff.</p> <p>DAF has commenced "master classes" for local government "authorised persons" to support local government compliance with the general biosecurity obligation (GBO) when managing invasive grasses.</p> <p>The learning process for Local Government authorised persons is ongoing. DAF will continue to provide training to Local Government authorised persons during 2023/24 and beyond.</p>
<p>Responding to fire ants</p> <p>We recommend the Department of Agriculture and Fisheries:</p> <p>7. strengthen its approach for assessing the progress and outcomes of the National Fire Ant Eradication program (Chapter 5). Decisions about what to do next should be guided by independent assessments grounded by scientific data and modelling. This should include periodically assessing whether it is technically feasible to eradicate fire ants from Queensland.</p> <p>8. report its progress in eradicating fire ants from Queensland (Chapter 5) and the outcomes of its activities. This should include developing and reporting regularly on performance measures that show how well the program is achieving its outcomes, such as the size of the fire ant infestation over time.</p>	Agree	<p>Q1 2023/24</p> <p>(subject to acceptance of revised national response plan)</p>	

Comments received from Director-General, Department of Agriculture and Fisheries on 22 June 2023



Department of
Agriculture and Fisheries

Our ref: CTS 10320/23

22/06/2023

Mr Brendan Worrall
Auditor-General
Queensland Audit Office
[Redacted]

Dear Mr Worrall

Thank you for your letter of 2 June 2023 inviting my response to the recommendations contained in the Queensland Audit Office (QAO) proposed report "*Managing Invasive Species*". As always, my department embraces the opportunities for improvement presented by these processes. I would like to take this opportunity to respectfully provide feedback on the report along with our response to the recommendations.

The proposed report appears to take a narrow view of biosecurity as managing weeds, feral animals and tramp ants in Queensland without taking into consideration the bigger picture of the National Biosecurity System. The Queensland Biosecurity System does not exist in isolation and even within Queensland, the management of invasive species, involves a number of Government entities along with Local Governments and the broader community. The Intergovernmental Agreement on Biosecurity between the Federal, State and Territory Governments aimed to strengthen the national biosecurity system. It defines the roles and responsibilities of governments and outlines the priority areas for collaboration to minimise the impact of pests and diseases on Australia's economy, environment and community.

In 2017, an independent report, "*Priorities for Australia's biosecurity system*" provided at the Agriculture Ministers' Forum, made recommendations for strengthening Australia's national biosecurity system including the development of a National Priority List of Exotic Environmental Pests, Weeds and Diseases (EEPL) to strengthen environmental biosecurity and to develop a national approach to address biosecurity risks to Australia's environment. The EEPL was released in November 2020. The Department of Agriculture and Fisheries (DAF) was involved in nominating invasive plants and invasive animals previously assessed as posing threats to Queensland's environment. The final national priority lists for weeds, invertebrate (insects) and vertebrate pests (feral animals) are dominated by invasive plants and animals already included in the *Biosecurity Act 2014* as either restricted matter or prohibited matter. The lists in the *Biosecurity Act 2014* are Queensland's priority invasive plants and invasive animals including tramp ants.

DAF, through Biosecurity Queensland, leads and delivers four nationally cost-shared eradication programs for Red Imported Fire Ant (RIFA), Red Witchweed, Tropical Weeds and Electric Ants. The finding that “Biosecurity Queensland’s primary focus is invasive species that have an economic impact” is therefore somewhat surprising given that three of the four current national programs are considered to have far greater environmental and social amenity impacts.

The National Red Imported Fire Ant Eradication Program (NRIPAEP), chosen as a case study for this audit, is unlike any other program attempted in the history of biosecurity in Australia. Accordingly, it has been reviewed a number of times in its 20+ year history. In 2021, the RIFA Steering Committee commissioned an independent strategic review of the Program with the aim of examining the Program’s effectiveness, the feasibility of achieving fire ant eradication and alternative strategies for achieving the eradication objectives. On 3 September 2021, the Independent Review Panel delivered its report, the *‘National Red Imported Fire Ant Eradication Program Strategic Review August 2021’*. The review was undertaken by an independent panel comprising of Dr Helen Scott-Orr, Dr Monica Gruber and Mr Will Zacharin. Dr Scott-Orr, the Chair of the review panel, was formerly the Australian Inspector-General of Biosecurity.

The review found that eradication remains technically feasible if changes in the program’s scope, strategy, budget and governance are initiated. A new response plan and a request for ongoing funding has been developed and endorsed by the Steering Committee and is progressing to Agriculture Ministers for their consideration. The QAO is silent on the role of Fire Ant Suppression Team (FAST) in assisting landowners to self-treat fire ants on properties in the core infested area. As part of the report, I question the use of some of the tables, including raw numbers on reports of fire ants in particular suburbs as there is not sufficient scope to provide context on how these numbers should be assessed and suggest a failure of the program.

The proposed QAO report espouses a hierarchical or “leader-follower” model of leadership, which is questionable in today’s society and modern biosecurity system that looks for the creation of an authorising environment and partnerships. The proposed QAO recommendation that Biosecurity Queensland “strengthen leadership and coordination role” in the management of invasive plants and animals is a reversal from a central tenant of the National Biosecurity System that “biosecurity is a shared responsibility”. The department has put considerable effort into bringing together its various key stakeholders, including Local Government, to work collaboratively across sectional interests which vary significantly across the State. This central shared responsibility will continue during the revision of the Queensland Biosecurity Strategy which is currently underway.

I note the findings related to the Invasive Plants and Animals Strategy 2019-2024, including the unsurprising finding that the earlier document does not refer to the Biodiversity Conservation Strategy published three years later in 2022. I commit my department to work with the Department of Environment and Science and other stakeholders to develop suitable performance measures for managing invasive species that align with the performance measures in the Biodiversity Conservation Strategy. I also note Mr Jamie Merrick, Director-General of the Department of Environment and Science's response of 17 February 2023 to the QAO performance audit report 9:2022-23 "*Protecting our threatened animals and plants*" which also identifies other DAF strategies and programs for alignment with the Biodiversity Conservation Strategy.

The proposed QAO report makes findings that appear to suggest that DAF has over prioritised funding for cluster fencing as compared to funding the control of feral cats. The proposed report fails to recognise the rounds of the Queensland Feral Pest Initiative (QFPI) which were devoted solely to cluster fencing. These grants served a dual purpose as a biosecurity measure to mitigate predation of livestock by wild dogs and as an industry economic development and support role to provide employment and place the sheep and wool industry on the road to recovery after years of drought.

The department has received additional funding towards biosecurity preparedness for animal diseases, including \$3.47 million to improve coordination of feral pig suppression in the event of an exotic animal disease incursion. This helps shift Biosecurity Queensland's posture to proactively meet emerging threats and empower the collective responsibility of the community and industry to face biosecurity threats posed by established pests. The department plans to continue to deliver Queensland Government commitments such as providing funding to local communities through industry groups, Local Governments and Natural Resource Management Groups to manage invasive plants and invasive animals in further rounds of the Queensland Feral Pest Initiative to allow participants in the Queensland Biosecurity System to be leaders in their areas of responsibility.

The proposed QAO report makes findings about deficiencies in the content of Local Government biosecurity plans or a lack of performance measures. The report makes no recommendations as to how this could be effectively addressed by Local Government, as part of the biosecurity system, or for appropriate levers that the department may use to improve the preparation, review and implementation of these biosecurity plans by Local Government. I note that regulatory measures in relation to the preparation of Local Government biosecurity plans requiring approvals from the State were removed during preparation of the Biosecurity Bill 2013 as part of "red-tape reduction".

1 William Street Brisbane
GPO Box 46 Brisbane
Queensland 4001 Australia
Business Centre 13 25 23
Website www.daf.qld.gov.au
ABN 66 934 348 189

The exercise of regulatory powers under the *Biosecurity Act 2014*, such as issuing biosecurity orders to a person for failing to discharge a General Biosecurity Obligation (GBO), rests with an authorised person appointed by the Chief Executive Officer of a Local Government and not with the Local Government Senior Management or the elected Councillors. The Council approved Local Government biosecurity plan should give guidance both to a person to understand how to discharge their GBO in the local context of biosecurity risks posed to local industry and local environment and also guidance to the authorised officer to enforce, when necessary, with a biosecurity order. It should also be noted that the use of a Biosecurity Order under the Act is but one regulatory approach to achieve compliance with the legislation and in many circumstances is viewed as a last resort. On this basis, it is not an effective metric to determine a level of compliance or enforcement effort undertaken by an authorised officer.

The department recognises that there has been considerable turnover in senior management of Local Governments since the commencement of the *Biosecurity Act 2014* in July 2016 and that a dedicated education and awareness program for elected Councillors and training packages for Local Government Senior Management is now necessary to dispel some misconceptions about roles and responsibilities of Local Government under the *Biosecurity Act 2014*. The learning process for Local Government appointed authorised persons is ongoing with Biosecurity Queensland Officers having provided Biosecurity Act training or retraining to 103 Local Government officers from 16 Local Governments in South East Queensland over six training sessions during 2022/23. This training program is also being provided in other regions with training sessions for 30 officers from 10 Local Governments at Rockhampton and Longreach.

My specific responses to the seven recommendations are provided in the attached Appendix 1 on the QAO template provided.

I appreciate the work undertaken by the QAO to improve the performance of the department in relation to the management of invasive species. In that spirit of improvement, I suggest that future performance audits on this topic may be strengthened by inclusion of independent subject matter expertise with biosecurity experience to complement the audit teams.

If you require any further information, please contact [REDACTED]
[REDACTED]
[REDACTED]

Yours sincerely



Dr Chris Sarra
Director-General
Department of Agriculture and Fisheries

Att: DAF response to recommendations proposed QAO report "*Managing invasive species*"

Department of Agriculture and Fisheries



Correspondence with Director-General, Department of Agriculture and Fisheries



Your ref: CTS 10320/23 & 11653/23
Our ref: PRJ03579

SENSITIVE

28 June 2023

Dr C Sarra
Director-General
Department of Agriculture and Fisheries
1 William Street
BRISBANE QLD 4000

Dear Chris

Performance audit of Managing Invasive Species

Thank you for your letters dated 22 and 26 June 2023, in which you provide your comments on my proposed report for the performance audit of *Managing Invasive Species*.

I note that you have agreed to all the recommendations in my report and provide information on your plans to implement the recommendations.

I appreciate your comments in your letter regarding that conduct of the audit and suggestions that may enhance the Queensland Audits Office (QAO) approach to such audits in the future. As always, my staff will consider your suggestions and, where appropriate, we will make changes to enhance our audit engagement and processes. There are a few of your comments, however, that, for sake of clarity and accuracy, need to be directly addressed.

Feasibility of the eradication of fire ants

You comment that the National Red Imported Fire Ant Eradication Program Strategic Review August 2021 report (the report) found 'that eradication remains technically feasible if changes in the program's scope, strategy, budget and governance are initiated'. The view that eradication remains technically feasible overstates what the report and the subject matter experts actually said. Page 47 of the report states that 'technical feasibility of eradication is unclear at this time' and further states that eradication 'may eventually be feasible' (not remains feasible) with major changes in the program. The full extract from page 47 of the report is reproduced below:

"Based on previous successes, the containment of polygyne infestations and the elimination of RIFA from significant portions of SEQ, it is still considered biologically feasible to eradicate the ants. However, due to the scale of the infestation at this point, and outstanding uncertainty regarding the effectiveness and strategic use of RSS in routine operations, the technical feasibility of eradication is unclear at this time.

In view of Program outcomes to date and current risks of spread, a major change of strategy is needed for any possibility of long term eradication and even for continued mitigation of a build-up of infestation with consequent serious problems. Gains made to date must be preserved if possible, while a new strategy is put in place. In the longer term, eradication may eventually be feasible, but only with major changes in program scope, strategy, budget and governance, and possibly with new technologies."
(Underlining added).

Queensland Audit Office
Level 14, 53 Albert Street, Brisbane Qld 4000
PO Box 15396, City East Qld 4002

Phone 07 3149 6000
Email qao@qao.qld.gov.au
Web www.qao.qld.gov.au
 Queensland Audit Office (QAO)

Leadership of the state's biosecurity system

Your comment that my report 'espouses a hierarchical or leader-follower model of leadership' is not accurate. My report acknowledges that all Queenslanders, land owners and levels of government have both specific and general responsibilities for biosecurity. However, given the limited information, expertise and resources available, statewide leadership is needed to coordinate and prioritise effort in the state and national interest.

Independent subject matter expertise

Finally, and importantly my staff engaged with a wide range of national and international experts on biosecurity and, specifically, on fire ants. This included members of the National Fire Ant Independent Review Panel. This is made clear throughout my audit report and specifically in Appendix C, which under the heading subject matter experts states:

"We interviewed subject matter experts. This included entomologists – to understand the biology of fire ants and their impact and spread. We also discussed approaches to containing and eradicating fire ants in Australia and other countries, like the United States."

In addition, on page 23 of the report we state that:

"We spoke with national and international subject matter experts about the feasibility of eradicating fire ants in South East Queensland given the size of the infestation."

In closing, I would again like to thank you for your comments. As always, your response letters to the report will be published in Appendix A of my report when it is tabled in parliament. In the interests of accuracy, I intend to also publish this letter in the appendix of the report.

In the meantime, please do not hesitate to contact me should you have any questions. If you would like further detail on the audit, please do not hesitate to have your staff contact [REDACTED]

Yours sincerely



Brendan Worrall
Auditor-General

SENSITIVE

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