# PERSPECTIVES IN BIOSECUTIAN RESEARCH SERIES 3/2015

#### OPINION

Focus and Performance in Managing Post-border Biosecurity in New Zealand Jack Craw series editors Dan Blanchon Mel Galbraith

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## **By Jack Craw**



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Cover design by Penny Thomson Cover image by Mel Galbraith

On the cover is the Australian tachinid fly (Trigonospila brevifacies), a parasitoid of other insects, specifically larvae of a number of Lepidoptera. It was introduced into New Zealand as a biological control agent for pest leaf roller moths, is also known to affect non-target and nonpest species, and to compete with native parasitoids.

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# Focus and performance in managing post-border biosecurity in New Zealand

Author Jack Craw

PINION

The New Zealand public, its industries and the conservation sector, are greatly concerned about the state of national biosecurity protection, awareness and system performance – and rightly so. Scarcely a day goes by without a new story in the media about a biosecurity breach, a pest, a threat or a related impact on the economy, biodiversity, human health or lifestyles. The vast majority of this public focus is on issues at the national border. Yet the greatest number and cost of biosecurity programmes in New Zealand, and the greatest impact on citizens' wallets, are the many pest management programmes developed and implemented by regional and unitary councils.

These programmes tend to be largely ignored by the national media, possibly because they are implemented by 17 disparate regional and unitary councils (hereafter referred to as councils), and possibly because most of the programmes are unspectacular, business-as-usual, necessary activities that help to keep farming profitable, the environment liveable and conservation achievable. There has also been, surprisingly, little wider scrutiny of the performance and scope of these regional bodies and their biosecurity programmes.

The reasons for this lack of scrutiny and criticism of regional biosecurity programmes are largely due to their relative success, conservative regional policy, lack of clarity in annual reporting and lack of national oversight. The intention of this opinion piece is to highlight regional biosecurity programme scope and performance, credit their successes, explain in some way why scrutiny, reporting and performance have been poor, and suggest how better assessment and reporting would be good for councils, the Ministry for Primary Industries (MPI), the Department of Conservation (DOC) and biosecurity outcomes in New Zealand. It is not the intention to critique any specific council.

Virtually all pest control and biosecurity programmes administered and funded by councils are defined in Regional Pest Management Strategies (RPMSs), which are created under the Biosecurity Act 1993. This very powerful and allencompassing stand-alone Act is superior legislation in almost all aspects including scope and enforcement provisions, and particularly appropriate in that it allows regional communities to own and decide three vital matters:

- 1. What is a pest? Any organism of non-human origin can be declared a pest, subject to several sensible caveats: if the regional community feels that the organism constitutes a threat to their environment, native species, human health and the economy.
- 2. How should pests be managed? They can be excluded,

eradicated, pushed back, controlled, publicised, researched or otherwise considered. Different groups can be charged with pest management responsibilities. Also timeframes can be set for completion of the adopted programmes.

3. Who pays? Programmes can be funded by land rates, benefactors of the programmes or those that cause the problem. Programme funders can be industry or end-user groups, and co-funding options exist involving other organisations.

This flexibility in RPMS programme creation is a major factor in programme success. Councils are able to tailor and deliver programmes that communities demand, and this is borne out in the very low levels of public complaint. Another excellent arbiter of council success has been the total absence (as far as I have been able to determine) of complaints against councils for alleged abuse of their (considerable) powers of entry, search, giving directions, taking actions upon default etc. This suggests that councils are in touch with their respective communities.

Councils generally provide good to excellent advice on pest control and the need for better biosecurity prevention measures.

One generally successful programme for councils is possum and rodent control. Use of toxins is always controversial yet councils receive very few complaints of poor programme performance. The community has been educated regarding the need for possum control and most people accept that toxin use is part of the solution, and have frequently become part of collaborative programmes.

Councils generally provide good to excellent advice on pest control and the need for better biosecurity prevention measures. This includes provision of advice on a wide range of control methods including non-chemical options. Staff are typically very motivated, in the manner of conservation workers, as they believe that their profession is a calling rather than a job. Staff loyalty and retention rates are high, staff thirst for new solutions and most are very well trained and knowledgeable. The creation of outcome-focused programmes under RPMSs helps with maintaining staff focus and morale. Most new council biosecurity staff appointees



'Asian paper wasp' (Polistes chinensis) by Mel Galbraith

are graduates in ecology or related fields and do not lack for initiative, outcome alignment and commitment.

Councils are very proactive regarding biological control of pests. They fund research extremely efficiently through the unique Regional Collective, and they release and monitor agent releases in order to keep programmes affordable. This collective mentality extends to many other areas, particularly biosecurity research, RPMS and programme development, legal interpretation and legislation changes, development of new pest control methodologies, representation on national biosecurity bodies, and adoption of unified standards for training and advisory materials. These all save ratepayers a great deal of money, not only in avoidance of duplication of effort, but also in allowing tender and other contract conditions to be standardised which reduces contract costs. Councils in key areas effectively act as a single national organisation, which has immeasurable benefits for all players including ratepayers.

The strong community focus of councils also provides for generally excellent cooperation with community and sector groups. In my time as a Biosecurity Officer and Manager I enjoyed very satisfying and productive relationships with Federated Farmers; Forest & Bird; conservation and farm advisory groups; the horticulture, silviculture and nursery industries; DOC; Queen Elizabeth II National Trust; pet societies; MPI (and its predecessors the Ministry of Agriculture and Forestry (MAF) and MAF Biosecurity New Zealand) and every other relevant group. It would be difficult to duplicate this outside of regional council employment. Councils represent local communities and this representation brings significant leverage.

Councils are making solid progress with improving relationships with iwi, including sharing and devolving decision making and supporting each other's submissions to Environmental Protection Authority (EPA) issues and the like.

Councils have also been quick to take up new pest control science and adapt their programmes accordingly. This has generally been done cooperatively, without national assistance, funding, and coordination. There is a unique symbiotic relationship between councils and the Crown Research Institutes (CRIs), as is evidenced by collaborative funding of biosecurity science programmes.

Councils are making solid progress with improving

relationships with iwi, including sharing and devolving decision making and supporting each other's submissions to Environmental Protection Authority (EPA) issues and the like. The same can be said of councils' relationships with the conservation sector, where Forest & Bird and conservation groups are now considered as programme allies rather than the annoying complainers of old. This says a lot about how far councils have come in the last 20 years in their attitudes and commitment to biodiversity and habitat protection.

Perhaps the most glaring examples of poor RPMS development and poor council performance has been regarding feral deer, pigs and goats.

The relationship between councils and DOC is complicated. Until recently, DOC deliberately remained outside Biosecurity Act 1993 coverage through a mixture of reasons - but chiefly a fear of being held liable for funding the management of low-priority boundary-issue pests (gorse, ragwort, rabbits, broom, possums etc.). Funding cuts had led to DOC withdrawing from active engagement with councils and the community, which ironically has cost them money and programme success in the medium term. Another factor was the residual, but determined, recreational hunting culture existing amongst DOC upper management - the result of ex-Forest Service staff gaining many senior positions in DOC at its creation in 1987. This meant that DOC clung to the antiguated and demonstrably ineffective Wild Animal Control Act 1977, where pest animals are treated as a recreational resource and DOC is now close to powerless in preventing illegal animal release and other behaviours. The lack of integration between Biosecurity Act 1993 and Wild Animal Control Act 1977 coverage left DOC alone in the landscape and many programmes of mutual benefit were not created. However the seemingly endless procession of DOC funding cuts and new government policy of community engagement (and community resourcing of programmes) now has DOC desperate for councils to take over responsibility for many of its programmes. The lack of mutual understanding and trust has improved but issues remain over legislative coverage in some areas and how to fund pest control on large parts of the huge DOC estate. This hampers integration of landscape scale responses and programmes, which should surely be the Holy Grail for pest management in New Zealand.

Councils have been very effective in their ability to provide assistance to MPI in national biosecurity emergencies e.g. actual and suspected new pest incursions. MPI has a contractual arrangement with its former operational arm AsureQuality to manage these responses and AsureQuality has frequently been found wanting in terms of preparedness, training, logistics and capacity. Councils have been able to step in and manage many of the core tasks required of first response programmes.

The performance of councils in outreach and education programmes has been somewhat mixed. Although advisory functions are well covered, there has been a trend of weakening focus on pest education campaigns and interregional cooperation in developing educational resources. Funding cuts generally mean that outreach suffers first and thus opportunities have been lost but collectively councils could have been more pro-active in creating national-regional campaigns and educational resources.

MPI, as the body with national oversight and some important responsibilities, has developed some novel and very sensible national programmes that councils have signed up to deliver within their own jurisdictions. This has been of immense benefit to councils, in that they are spared the cost of programme development (including legal costs), the programmes are entirely consistent across the country, and are partly (or largely) funded by MPI. Examples are the National Pest Plant Accord (NPPA), the National Interest Pest Response (NIPR) programme and the National Kauri Dieback Programme. Surprisingly, the performance by some councils in these programmes has been poor, with some of them essentially unwilling participants. I can recall several times finding rare and highly invasive pest plant (NPPA) species in nursery outlets in two cities, raising the matter with the retailers who claimed complete ignorance of the rules, reporting the findings to the respective councils, and yet discovering the same species in the same shops 12 months later. Some councils did not manage NIPR species responsibilities well, which was a lost opportunity to eradicate very highly invasive species from their region at no cost.

Some councils have taken a conservative approach to pest management policy and RPMS development. There have been very few examples where Biosecurity Act 1993 flexibility has been fully utilised, e.g. requiring a specific land use to aid pest management (Sec 73[5]). Also programme funding options (e.g. exacerbator pays, industry contribution) have been generally ignored, with councils seemingly content to lean on the traditional ratepayer-funding option. The Biosecurity Act 1993 requires councils to assign programme costs to both the exacerbator of the problem and the beneficiary of the programme however councils have relied almost exclusively on the latter. This is a missed opportunity because councils could maintain programmes for boundary-clearance pests on a self-funded basis.

Many RPMSs do not contain measures for highly or potentially invasive but currently low level pests of particular



'Purple loosestrife' (authors own)

types e.g. fish, birds, reptiles, some plants. The freshwater area is not generally well served. For some councils there have been notable missed opportunities with significant pests e.g. wallaby species, sulphur-crested cockatoo, rook. The response to significant insect pests has been slow but this has essentially been due to lack of national leadership from MPI (e.g. for guava moth).

Perhaps the most glaring examples of poor RPMS development and poor council performance has been regarding feral deer, pigs and goats. Some councils have progressive programmes but others include near-meaningless RPMS iargon that hides a lack of appetite to take any action essentially a bob each way approach. Some of this problem is due to confusion over DOC vs council jurisdiction (i.e. is the animal a Wild Animal Control Act 1977 resource or a Biosecurity Act 1993 pest?) but councils can include RPMS provisions for these pests without fear of resistance from DOC. Some councils have let themselves be bullied by a small but vocal recreational hunting fraternity that insists that it be accorded private hunting rights on public land and private land that it does not own. Illegal release of deer and pigs is widespread and most councils appear unwilling to address the issue.

Some councils have RPMS provisions for some pest species but this is not accompanied by effective programmes to manage the pest. It is as if the mere declaration of an organism is expected to lead to the species controlling itself.

All councils have struggled to find or purchase science to inform species impact and threat assessments and benefitcost studies, but that is not their fault. This information often does not exist and councils have collectively worked hard to obtain what they need or fund the necessary science. National leadership from MPI in this area would be advantageous but this has not been forthcoming.

MPI's role in providing national oversight has been very patchy. The national-regional programmes mentioned above have been truly progressive, however there has been little or no council programme audit by MPI and an absence of demand for councils to report programme results. MPI should be undertaking a programme performance audit across the system but to date has not done so. The problem is not helped by some councils not providing in-depth annual reports on their operational plans, a requirement in the Biosecurity Act. These councils obtained a legal opinion that the very minimal programme details included in councils' overall annual reports to ratepayers are sufficient to meet the legal requirement, however this information does not contain any true performance audit across all of their biosecurity programmes.

I believe that both ratepayers and councils would be better served by closer programme performance measurement. Inefficient and poorly performing programmes would be likely to be improved or terminated, and successful programmes would serve as templates for development of better programmes elsewhere. It is also surprising that Audit New Zealand is less active in auditing councils' programmes than previously. My council (Auckland Regional Council) was subject to programme audits in 2003 and 2005 but nothing since.

Many programme performance measurement issues are caused by lack of effective recording systems. This is a global issue not confined to biosecurity and councils have struggled nobly to individually and collectively develop or purchase digital recording systems. Shifting technologies, redundant and unsupported applications/ platforms, IT industry oversell/ underperformance, and massive and galloping developmental costs have all contributed to a continuing mare's nest of semieffective systems in operation. MPI attempted to become involved at one stage but has itself struggled to find solutions.

A major contributor to patchy regional-national programme development, coordination and reporting has been the lack of leadership from MPI. This has been essentially a political rather than departmental problem, with continuing political demands for change in national oversight but vague and tardy provision of this direction. The National Policy Direction imperative promised significant change and required councils to cease RPMS development for over 3 years, however when released it contained little benefit or change.

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The New Zealand Biosecurity Strategy 2003 was released with great fanfare and contained 57 objectives. The results of the statutory review by MPI in 2010 were never made available. In my view at least 20 of the 40 objectives involving post-border biosecurity had not been met and many of these had not been addressed at all. The National Biosecurity Science Strategy developmental process was also a disappointment, with MPI as Strategy facilitator giving its own pre-border and border needs much more weight. This caused councils to become disengaged and the National Biosecurity Science Strategy, essentially MPI's own document, now lacks any influence through lack of support and interest from councils, DOC, CRIs and other players.

MPI now finds itself underprepared for key incursion issues e.g. avian influenza, myrtle leaf rust, bird species, plant diseases generally. There has been little or no progress on development of a national border/ post-border biosecurity surveillance programme and this is a major concern. MPI has many capable staff and its pre-border focus and performance has been laudable. However the Ministry is constantly subject to changing political requirements, significant changes in focus and internal restructuring. This has led to a loss of focus on post-border biosecurity oversight, which has in turn left councils without clear advice on what it should be doing, particularly regarding surveillance, risk assessment, threat assessment, programme measurement and national-regional coordination of programmes. The marine biosecurity area is a good example of absence of clarity of MPI and council roles.

Overall, councils can be given a pass mark for regional biosecurity programme development and performance but significant questions remain regarding assessment and reporting on programme performance. MPI is in urgent need of external assessment and the National Biosecurity Strategy objectives would serve as the best place to start. If the generated goodwill and excellent performance of key programmes was to be extrapolated across the entire postborder biosecurity system, then New Zealand would have internal biosecurity to be rightly proud of.

### **Author Bio**

Jack Craw has 38 years experience designing and managing biosecurity programmes in New Zealand and Australia. He was the Biosecurity Manager for Auckland Regional Council and Auckland Council for 11 years, and upon retirement in 2014 has been working as a consultant primarily in the Pacific. He is a former member of the Northland Conservation Board, regional chair of Forest & Bird and chair of the Friends of Matakohe Limestone Island Society.

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