



Senior Manager  
Natural Environment and Resource Management  
Environment and Sustainable Development Directorate  
GPO Box 158  
Canberra ACT 2601

Dear Sir/Madam

Thank you for the opportunity to comment on the ACT's Draft Pest Animal Management Strategy.

The Friends of the Pinnacle wish to make the following comments on the Draft Strategy.

The Draft Strategy appears a comprehensive, science-based approach to pest control, applied within a risk management framework. Given the strategic nature of the document we offer only "high level" comments, which we hope may be reflected in the revised strategy.

Firstly, there is scope to rationalise the strategic goal and make the goal more meaningful for land managers and the community. Use of the term "*manage*" introduces ambiguity when there is broad agreement that impact minimisation is the desired outcome, and that the strategy is tenure-blind is clear from the supporting text. A revised strategic goal could be "*To set the framework for avoiding and minimising the undesirable social, environmental and economic impacts of pest animals in the ACT*". The emphasis is to first avoid new incursions and minimise existing ones, providing a clear basis to the objectives.

The Strategy has 10 "*key principles*", these could simply be "*principles*" as there are no non-key principles, and, for consistency with the strategic goal it may be wise to describe these as "*principles for avoiding and minimising the impacts of pest animals*", avoiding the ambiguous term *managing*. Principle 1 more closely resembles a definition than a principle, and pest animals may be defined as ones causing an *unacceptable* impact rather than *serious*.

The value in enunciating principles is to make clear the basis on which lower order strategies and actions are formulated and implemented, to achieve the goal and its subordinate objectives. With this in mind the principles should be rationalised and recast, for example:

*"the attitudes, concerns and capacity of key individuals and groups with an interest in pest animals should be demonstrably reflected in the design and implementation of pest control programs"* (Principle 2).

With respect to the intent of Principle 5, a more suitable statement would be "*pest animal control should be conducted as part of an integrated property management regime, to achieve a desired ecological or economic outcome*". The emphasis then is integrated management actions to achieve a condition or production outcome, avoiding the cumbersome and ill-defined concept of a "whole of system approach".

A revised Principle 7 "*continuous improvement should be achieved by implementing active adaptive environmental management systems*" would provide clearer direction for designing control activities. This would see control programs designed within an experimental context, monitoring, evaluation, public reporting and adjustments to implementation plans and actions.

Principle 10 alludes to the need for capacity building. This is not so clearly a principle as it is a strategy with a series of actions. In general, the 10 *principles* should be revisited to make them clearer drivers in setting practical directions for pest control.

The proposed Strategy would benefit from including a clear opportunity for community groups to control pest animals, in partnership with the Parks and Conservation Service. Not all groups would take up this opportunity, however, there may be suitably resourced and motivated groups capable of designing and implementing a rabbit control program, employing new low-risk control techniques. The Strategy might suggest the piloting of one or more joint control programs with community-based conservation groups.

If you seek clarification to any of the above please contact myself.



Vaughn Cox  
Convenor

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