In an era where environmental challenges continue to test our resolve and demand innovative solutions, the Australian Environmental Pest Managers Association (AEPMA) stands at the forefront of safeguarding our ecosystems and communities against invasive pests. We recognise that the presence of such pests can disrupt the delicate balance of our natural world, threaten agricultural industries, and compromise the well-being of our citizens. It is with this unwavering commitment to environmental stewardship and public safety that we address one of the most pressing threats our nation faces today – the Red Imported Fire Ant (RIFA).

In the following pages, AEPMA presents a comprehensive assessment of the challenges posed by RIFA in Australia, meticulously outlining the far-reaching consequences that this invasive species can unleash upon our continent. Drawing from a wealth of research, expert opinions, and real-world experiences, this document sheds light on the multifaceted impacts of RIFA infestations. We delve into the potential repercussions on human health, agriculture, the environment, infrastructure, social amenity, and the livelihoods of regional workers.

Our analysis uncovers not only the immense economic burden borne by the United States due to RIFA but also the sobering parallels that could befall Australia should we fail to act decisively. The costs, both financial and ecological, are too high to ignore, and the stakes are too great to delay action.

The challenges of RIFA management extend beyond economic concerns, raising profound questions about the efficacy of current response plans and the responsible allocation of public funds. AEPMA scrutinises the existing strategies, highlighting critical shortcomings and emphasising the imperative need for data-driven decision-making, transparency, and accountability in pest management efforts.

We also draw essential lessons from the management of another formidable adversary – the Varroa mite – offering a comparative perspective on the allocation of resources and the importance of stringent movement controls in pest containment.

As dedicated environmental pest managers and experts, AEPMA acknowledges that the battle against RIFA is not one that can be won through isolated efforts or fragmented approaches. It requires a unified, holistic, and strategic response. Therefore, we propose a 10-point plan that envisions the establishment of a specialised Red Fire Ant Commission, mirroring the successful model of the Australian Plague Locust Commission. This commission would play a pivotal role in coordinating efforts across affected states, fostering expertise, and ensuring accountability in our collective endeavour to eradicate RIFA from our shores.

I look forward to your early advice in respect of the above.
Regards

Stephen Ware
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1. **The costs and impacts of Red Imported Fire Ants in the United States,**

We can anticipate similar consequences if these ants were to spread across Australia. The costs of Fire Ant infestations to the USA are estimated to be over $6 billion per year. In the State of Texas, with climatic conditions similar to Australia, it is over $1 billion per year.

Human Health: Red Imported Fire Ants can pose a significant threat to human health. Their painful stings can cause severe allergic reactions in some individuals, leading to hospitalizations and healthcare costs. This impact on human health could result in increased medical expenses in Australia, mirroring the situation in the United States.

Social Amenity: The presence of Red Imported Fire Ants can disrupt outdoor recreational activities and limit the enjoyment of public spaces. Australians may face reduced quality of life and social amenity due to the aggressive nature of these ants, which could have negative social and psychological effects.

Agriculture: Fire ants are known to damage crops and livestock in the United States, leading to reduced agricultural productivity and increased costs for farmers. In Australia, a similar scenario could result in economic losses for the agricultural sector, affecting both crop yields and livestock.

Environment: Red Imported Fire Ants are invasive and can outcompete native species. Their presence could disrupt local ecosystems and harm native wildlife, potentially leading to ecological imbalances and additional conservation efforts, similar to the environmental impacts observed in the United States.

Infrastructure: Fire ants can damage electrical equipment, irrigation systems, and road infrastructure. Repairing and maintaining such infrastructure can be costly. In Australia, fire ant infestations could strain budgets for infrastructure maintenance and repair, as seen in the United States.

Regional Workers: Regional workers in agriculture and related industries may face challenges due to the presence of Red Imported Fire Ants. The costs associated with healthcare, reduced crop yields, and damaged equipment could affect regional workers' livelihoods, similar to the impacts observed in the United States.

The costs and impacts of Red Imported Fire Ants in the United States, as outlined above, provide a basis for understanding the potential consequences in Australia. These include adverse effects on

human health, social amenity, agriculture, the environment, infrastructure, and regional workers. To mitigate these potential costs, it is crucial for Australia to develop effective fire ant response plans and allocate appropriate funding for eradication efforts.

The economic costs should not be allowed to fund a program that is not cost effective nor its outcomes measurable.

B: ***an assessment of the current and any proposed fire ant response plans for achieving the eradication of red imported fire ants;***

The current response to Fire Ants has been ad-hoc and poorly planned. Reviews of the program have consistently found shortcomings and there is no evidence to suggest that these shortcomings have ever been properly addressed. In respect of the current program we would make the following observations

Federal Funding Announcement (October 2023):

In October 2023, Federal Minister Watt announced additional public funding for another fire ant eradication program.

The announcement should be characterised as “more of the same insanity”, suggesting that the approach taken in previous programs may not have been effective.

There is skepticism about the effectiveness of simply pouring more public money into a program without a clear evaluation of its past performance.

Queensland Audit Office Findings (August 2023):

The Queensland Audit Office reported that the Queensland's fire ant program lacks data to support its plans or progress reports.

This lack of data raises concerns about the program's ability to demonstrate its value for public money.

The government's progress and new plans are to be criticised for lacking data-driven evidence of success.

Failed Eradication Programs (July 2023):

Rightly, there is criticism that these programs have been unsuccessful and that they were implemented too late, with a 22-year delay.

A "horseshoe containment program" is mentioned, suggesting that containment efforts may not have been effective in preventing the spread of fire ants.

In summary, the assessment of the current and proposed fire ant response plans in Australia, as described above, raises significant concerns about their effectiveness. There is a lack of data-driven decision-making, a history of failed eradication efforts, and scepticism about the value of allocating more public funds without clear evidence of success. The situation appears to be characterised by challenges and shortcomings in the management of the fire ant eradication programs.

The Australian Environmental Pest Managers Association (AEPMA) previously responded to the review held by Dr Helen Scott Orr which failed to even consider any of the operational issues of concerns expressed by industry in the running of the program.

C: ***an evaluation of funding provided for the current or any proposed fire ant response plans;***

Historical Allocation of Funds:

The fire ant eradication program has been ongoing for 22 years, indicating a significant long-term commitment of public funds.

This extended period suggests that substantial resources have been invested in the program, encompassing various initiatives, personnel, equipment, and operational costs.

Critical Report and Lack of Accountability:

The presence of a critical report related to the program raises questions about accountability. Despite its existence, it appears that the program may not have adequately addressed the issues and recommendations within the report.

The failure to address critical findings and recommendations can be seen as a lack of transparency and responsibility in managing public funds.

Continued Spending without Improvement:

The Queensland Minister is allocating additional public money to the program, despite its history of failure.

This continuation of funding without demonstrable improvement in eradicating fire ants may be perceived as an inefficient and wasteful use of taxpayer dollars.

Need for Program Effectiveness Assessment:

The allocation of funds to a program with a history of underachievement raises the question of whether the program's effectiveness has been properly assessed.

There appears to be a lack of accountability measures to ensure that the allocated funds result in tangible progress and successful outcomes in terms of fire ant eradication.

Public Money Concerns:

The ongoing allocation of public funds without addressing underlying program issues may be seen as wasting public money.

It highlights the importance of not only providing funding but also ensuring that it is utilised effectively and efficiently to achieve the program's intended goals.

The fire ant eradication program in Queensland, combined with the existence of a critical report and the ongoing allocation of public funds without apparent improvement, underscores concerns about accountability, transparency, and the prudent use of public resources. It suggests the need for a comprehensive review of the program's financial management and effectiveness to ensure that taxpayer dollars are being used efficiently to address the fire ant infestation problem.

D***: the effectiveness of eradication efforts and the spread of fire ants***

Persistence of Fire Ants: Despite long-term efforts, fire ants continue to persist and expand in various regions of Australia. This indicates that the current strategies in place may not be achieving complete eradication.

Inevitable Spread: The presence of fire ants in Victoria, a previously uninfested area, suggests that containment measures have not effectively prevented their spread. This raises concerns about the program's ability to control the ants' expansion.

Long-Term Efforts: The fact that the fire ant eradication program has been ongoing for over two decades indicates that it has faced challenges in achieving its objectives within a reasonable timeframe. The prolonged duration of the program may imply a lack of effectiveness in eradicating fire ants.

Lack of Clear Success Metrics: The absence of clear and measurable success metrics for the fire ant eradication program makes it challenging to accurately assess its progress and effectiveness. The program should establish well-defined criteria for evaluating its success.

Resource Allocation: Substantial financial resources have been allocated to the program, with a significant amount spent. However, despite these investments, the continued presence and spread of fire ants raise questions about the efficient use of funds and the overall effectiveness of the program.

Need for Reassessment: The information strongly suggests a need to reassess eradication strategies and methods. The program's inability to prevent the spread of fire ants to new areas and its extended duration indicate that alternative approaches should be explored to achieve more effective fire ant control and eradication.

Public Awareness: Engaging the public in identifying and reporting fire ant infestations can be an effective strategy. Public awareness and involvement can aid in early containment and eradication efforts, potentially reducing the spread of fire ants.

The assessment of the effectiveness of eradication efforts and the spread of Red Imported Fire Ants in Australia highlights significant challenges. The persistent presence and spread of fire ants, the absence of clear success metrics, and substantial resource allocation without corresponding results all point to the need for a critical review and potential revision of the current approach to achieve more effective fire ant control and eradication.

E: ***learnings of Varroa mite in managing red imported fire ants***;

Regarding the Varroa mite, it's important to note that this external parasitic mite poses a severe threat to honeybees, making it one of the most destructive honey bee pests worldwide. A significant infestation by the Varroa mite typically results in the demise of a honeybee colony, typically occurring from late autumn through early spring.

Drawing lessons from the experience with Red Imported Fire Ants, we can identify three key takeaways:

- Importance of Movement Controls: Implementing stringent movement controls to prevent the spread of the Varroa mite was arguably the most crucial preventive measure that governments could have taken. Failure to effectively regulate the movement of beehives in and out of infested areas was a major contributing factor to the mite's spread.

- Resource Allocation Disparity: Comparatively, the funding allocated for Varroa mite control was minimal when contrasted with the hundreds of millions of dollars spent on combating Red Imported Fire Ants. This significant resource allocation toward one invasive pest, particularly when spent inefficiently, can hinder the government's ability to respond adequately to other equally devastating threats facing Australia's agricultural and pasture industries.
- Rethinking Response Strategies: The initial response to the Varroa mite followed Australian animal and plant health contingency plans, with the combatant State (in this case, NSW) shouldering the responsibility for providing the necessary manpower and expertise if a long-term eradication approach were pursued. Given the challenges faced by state departments in terms of expertise and competing responsibilities, it is prudent to explore alternative models for addressing this ongoing issue effectively.

F: Other Comments

The Australian Environmental Pest Managers Association would put forward its own 10 point plan for the ongoing management and control for the Red Imported Fire Ant.

1. **The establishment of a Red Fire Ant Commission. This would be similar to the Plague Locust Commission, and would be funded by States affected by Fire Ants.**

The establishment and successful operation of the Australian Plague Locust Commission (APLC) provide a compelling case for the creation of a similar commission dedicated to addressing the threat posed by Red Imported Fire Ants (RIFA) in Australia. The APLC's history, purpose, and roles demonstrate the value of having a specialized agency to combat invasive pests that pose interstate threats to agricultural industries. Here's why a similar commission for RIFA is warranted:

<u>Historical Precedent:</u>

The APLC was created in response to the interstate spread of locusts, which presented a significant agricultural threat. Similarly, RIFA is known for its rapid territorial expansion, and history has shown that it can quickly infest new regions. The establishment of a dedicated commission for locusts can serve as a model for addressing RIFA's interstate threat effectively.

<u>2. Specialised Expertise:</u>

Just as the APLC was established to manage specific locust species, a dedicated commission for RIFA could focus on understanding the biology, behaviour, and control methods specific to these invasive ants. Specialised expertise is crucial for developing effective eradication and control strategies.

<u>3. Interstate Cooperation:</u>

The APLC's formation required cooperation between multiple states and the federal government, recognising the need for a unified approach to combat a shared agricultural threat. Red Imported

Fire Ants also require coordinated efforts across states, making a dedicated commission a logical choice to facilitate interstate cooperation.

Funding Model:

The APLC's funding model, with contributions from various levels of government, demonstrates a shared commitment to pest control. A similar funding model could be established for RIFA, ensuring that the financial burden is distributed equitably among different stakeholders.

Clear Purpose and Roles:

The APLC's charter outlines its specific purpose and roles, including preventive control, environmental protection, research, monitoring, and collaboration with national and international programs. A dedicated commission for RIFA could have a similar charter, providing clarity on its responsibilities.

Accountability and Oversight:

The APLC's governance structure, with Commissioners overseeing its operations, ensures accountability and oversight. A comparable structure could be established for RIFA management to ensure that resources are used effectively and transparently.
7. Adaptability and Continuous Improvement:

The APLC's commitment to reviewing its operations to meet evolving expectations aligns with the need for adaptability and continuous improvement. This approach ensures that the commission remains responsive to the changing challenges posed by invasive pests.

2. **Urgently Investigate the use of biological controls for Fire Ants**.

In particular Phorid Flies, are a natural parasite of Fire Ants and have been released in the USA for the control of Fire Ants. The jury is out regarding their effectiveness, however anecdotal reports indicate a 5% reduction in Fire Ant populations and a change in the behaviour of Fire Ants that makes them easier to control

Phorid flies offer a unique and potentially more effective approach compared to pesticides for controlling Red Imported Fire Ants (RIFA). While pesticides may have a role in localized and short-term scenarios, the following points highlight why phorid flies are a valuable alternative:

Long-Term Effectiveness: Phorid flies are likely to be a more economically sustainable and safe method for reducing the pest status of RIFA over an entire region and an extended period,

spanning decades. Unlike pesticides, which may require ongoing applications and can have environmental concerns, phorid flies can provide a more enduring solution.

Targeted Approach: Female phorid flies selectively target individual fire ants for parasitisation based on size preferences, injecting eggs into the ant's body. This focused approach helps in controlling fire ant populations without indiscriminate harm to other organisms, promoting ecological balance.

Disruption of Fire Ant Behaviour: Phorid flies, while searching for victims, provoke a response from fire ants, causing them to hide, retreat, and exhibit unusual behaviours. This disruption in fire ant behaviour can undermine their ability to provision nests with food and protect their territory, indirectly benefiting native ant species.

Biocontrol and Environmental Protection: Phorid flies contribute to biocontrol by keeping fire ant populations in check. Their specific targeting of fire ants minimizes the risks associated with pesticide use, such as harm to the natural environment, human health, and agricultural markets.

Potential for Disease Control: Phorid flies may also act as vectors for transmitting diseases among fire ant colonies, further aiding in population reduction.

Species Specificity: The phorid flies selected for release have undergone careful screening to ensure they are highly specific to the imported fire ant. They are not known to target other organisms, mitigating concerns about unintended consequences.

Phorid flies offer a more sustainable, targeted, and environmentally friendly approach to controlling Red Imported Fire Ants over the long term. Their ability to disrupt fire ant behaviour, minimise ecological risks, and specifically target fire ants makes them a valuable tool in reducing the pest status of RIFA in a safer and more balanced manner than traditional pesticide use.

3. Expansion of the Role of the Inspector General of Biosecurity to be given expanded powers to review ongoing eradication programs – including Fire Ants

To enhance the effectiveness of biosecurity measures and address the ongoing threat posed by invasive species such as Red Imported Fire Ants (RIFA), it is advisable to expand the scope of the Inspector-General's responsibilities to include the ongoing review and monitoring of existing eradication plans, particularly those related to RIFA.

This expanded scope would fall within the existing framework of the Inspector-General's mandate while providing a comprehensive approach to biosecurity.

The Inspector-General's scope currently covers a wide range of biosecurity arrangements and actions, including pre-border, at-the-border, and peri-border activities. To incorporate ongoing review and monitoring of existing eradication plans for RIFA and similar invasive pests, the following points can be considered:

- Pre-Border Arrangements and Actions:

Review and assess the department's strategies for preventing the introduction of RIFA into Australia. This may involve evaluating international collaborations, offshore risk assessments, intelligence gathering, and capacity-building efforts aimed at mitigating the risk of RIFA incursions.

- At-the-Border Arrangements and Actions:

Evaluate the effectiveness of screening, inspections, enforcement, and quarantine measures in preventing the entry of RIFA into the country. Assess the department's engagement with regulated entities and their compliance with biosecurity regulations related to RIFA.

- Peri-Border Arrangements and Actions:

Monitor the surveillance and emergency response plans and their execution, specifically regarding RIFA. Review the department's collaboration with states, territories, and industry stakeholders in addressing RIFA incursions and outbreaks.

- Ongoing Review and Monitoring:

Implement a systematic and continuous review and monitoring process for existing eradication plans related to RIFA. This includes assessing the governance, regulation, policy effectiveness, strategy, innovation, and assurance mechanisms in place to combat RIFA infestations.

- Data Management and Reporting:

Ensure that the department's data management practices related to RIFA are effective and support informed decision-making. Evaluate the reporting mechanisms for RIFA-related activities and incidents.

- Funding and Investment:

Examine the allocation of funds and investments dedicated to RIFA eradication and control efforts. Assess the adequacy of resources and their alignment with the goals of eradication.

- Stakeholder Engagement:

Review the department's engagement with stakeholders, including communities, industries, and scientific experts, to ensure their active involvement in RIFA-related initiatives and their feedback is considered in planning and decision-making.

- Implementation of Plans and Recommendations:

Monitor the implementation of recommendations and action plans related to RIFA eradication. Ensure that the department follows through on suggested improvements and changes to biosecurity strategies.

4. Houses sold and transferred in NSW and QLD (and or other States determined to have Fire Ants) should be inspected and sold certifying they are free of Fire Ants.

Timber Pest Inspections are a mandatory requirement for house sales in New South Wales (NSW) and Queensland (QLD) to assess the presence of wood-boring pests and termites in residential properties. A Code of Practice has been established to guide these inspections and ensure compliance with relevant regulations. Given the growing concern regarding the spread of Red Imported Fire Ants (RIFA) in Australia, it is essential to incorporate a fire ant inspection component into the existing Timber Pest Inspection Code of Practice.

Rationale:

Biosecurity Threat: RIFA is an invasive pest that poses a significant threat to agriculture, the environment, and public safety. Their presence can have devastating consequences, and early detection and containment are crucial to prevent their spread.

Mandate Expansion: Expanding the Timber Pest Inspection Code of Practice to include fire ant inspections aligns with the need for proactive biosecurity measures and complements existing regulations.

Protection of Property Value: Detecting and addressing fire ant infestations before property sales can protect property values and provide potential buyers with confidence in the property's condition.

Proposed Inclusions:

The expanded Timber Pest Inspection Code of Practice should include the following elements related to fire ant inspections:

- Identification Guidelines: Detailed guidelines for identifying Red Imported Fire Ants, including physical characteristics, nesting behaviors, and common signs of infestation.

- Inspection Methods: Procedures for conducting fire ant inspections, including examination of outdoor areas, gardens, lawns, and potential nesting sites such as mounds and disturbed soil.

- Reporting Standards: Clear standards for reporting fire ant findings, including documentation of the location, extent of infestation, and recommended actions.

- Treatment Recommendations: Guidance on appropriate treatment and eradication measures for fire ant infestations, including the use of approved control methods and the engagement of licensed pest control professionals.

- Compliance Requirements: Information on compliance with state and federal regulations regarding the reporting and management of fire ants, emphasizing the importance of early reporting and containment.

- Educational Resources: Provision of educational resources and materials to assist homeowners, inspectors, and real estate agents in understanding fire ant risks and prevention measures.

Implementation:

To implement this inclusion, the following steps are recommended:

Collaboration: Collaboration with relevant state and federal biosecurity authorities to ensure alignment with existing guidelines and regulations.

Training: Training of timber pest inspectors to equip them with the necessary skills and knowledge for fire ant inspections.

Public Awareness: Public awareness campaigns to inform homeowners, real estate agents, and inspectors about the expanded Code of Practice and the importance of fire ant inspections.

Reporting Mechanisms: Development of reporting mechanisms and databases to track fire ant inspections and findings.

Expanding the Timber Pest Inspection Code of Practice to include fire ant inspections is a proactive step toward enhancing biosecurity measures in NSW and QLD. This inclusion will contribute to early detection, containment, and prevention of the spread of Red Imported Fire Ants, protecting property values and the environment while ensuring compliance with regulatory requirements. Collaboration, training, and public awareness efforts are essential for successful implementation.

Additionally, it should be noted that Red Imported Fire Ants (RIFA) have been discovered in the northern rivers region. This presence of RIFA has introduced discrepancies that are impeding the progress of land development in new residential areas. These discrepancies are primarily associated with decisions related to soil movement, especially in areas under surveillance and managed by pest control contractors. Consequently, these issues are causing delays in the completion of small sections of development and hindering the release of land for use.

5. The proposed primary production biosecurity levy should not be used as a back door method of funding a flawed Fire Ant eradication program.

The introduction of the Biosecurity Protection Levy, commencing on July 1, 2024, represents a significant step in securing sustainable funding for Commonwealth biosecurity activities. While it is a positive move towards enhancing Australia's biosecurity capabilities, it is essential to ensure that these funds are utilized judiciously and not used as de facto funding for fire ant eradication programs that lack proper cost assessment, evaluation, and monitoring mechanisms.

<u>Key Points to Consider:</u>

Transparent Allocation: The Biosecurity Protection Levy is intended to collect approximately $50 million per year to maintain Commonwealth biosecurity functions sustainably. While this funding is critical, it should be transparently allocated to various biosecurity activities, including prevention, preparedness, response, and recovery, rather than being predominantly channelled into specific programs like fire ant eradication.

Cost-Effective Spending: Fire ant eradication programs, like any other biosecurity initiative, should be subject to rigorous cost assessments and evaluations. The allocation of funds should

prioritise programs that demonstrate cost-effectiveness and the ability to deliver meaningful outcomes in line with their budgets.

Monitoring and Evaluation: Biosecurity funding, including that designated for fire ant eradication, should be subject to ongoing monitoring and evaluation to assess the efficacy and efficiency of spending. It is crucial to ensure that taxpayers' money is well-spent and that programs are achieving their intended objectives.

Transparency and Accountability: The commitment to increased transparency and accountability in biosecurity funding, as outlined in the 2023-24 Federal Budget, should extend to all aspects of biosecurity expenditure, including fire ant eradication. Regular reporting of income and expenditure should be accompanied by detailed breakdowns of funding allocation and outcomes achieved.

Equitable Levy Structure: The proposed levy rates for different agricultural, fisheries, and forestry sectors should be equitable and proportionate to the potential biosecurity risks they pose. This ensures that each sector contributes fairly to biosecurity funding.

Consultation and Industry Involvement: Collaboration with industries is essential when considering changes to fees, charges, and levies. It is vital to engage with stakeholders to determine the most appropriate funding mechanisms and to assess the potential impact on industries.

International Trade Obligations: Any new levy or changes to existing fees and charges must align with Australia's international trade law obligations to avoid potential trade disputes or conflicts.

While the Biosecurity Protection Levy is a significant step towards bolstering Australia's biosecurity defences, it should be managed carefully to avoid becoming a source of de facto funding for specific programs like fire ant eradication. Proper allocation, cost assessments, monitoring, and transparency are essential to ensure that biosecurity funds are used efficiently and effectively to protect Australia's agriculture, environment, and public health.

6. A new process should be established for running long term invasive animal responses.

The existing procedure for managing invasive animal and pest incursions involves establishing a cost-sharing arrangement between the Australian states and the Commonwealth. Under this framework, the state where the incursion initially occurred assumes the role of the combatant state and is tasked with overseeing the eradication program.

For the past two decades, the fire ant program has been administered in Queensland, with Queensland contributing only 10% of the funding. This arrangement has led to bureaucratic inertia and has not incentivised Queensland's public servants to effectively control the pests in a cost-efficient manner.

Financial Transparency: The establishment of a new authority would enhance financial transparency and accountability in the allocation of funds for emergency pest and disease responses. This authority would be responsible for meticulously tracking and managing financial contributions from various stakeholders.

Fair Resource Allocation: Over time, stakeholders may have varying levels of financial contributions towards eradicable plant and disease responses. A new authority can ensure that resources are allocated fairly, taking into account the proportional funding contributions of each stakeholder. This approach promotes equity and discourages free riding.

Efficient Fund Utilisation: The new authority can streamline fund utilization by prioritizing projects and initiatives based on the severity of the pest or disease outbreak, the available resources, and the contributions of stakeholders. This ensures that funds are used efficiently and effectively to address the most pressing issues.

Long-Term Sustainability: By reflecting funding contributions over a specified period, the new authority can facilitate long-term sustainability in eradicable plant and disease response efforts. It encourages continued financial commitment from stakeholders and ensures ongoing support for biosecurity initiatives.

Improved Coordination: A dedicated authority can improve coordination among various government agencies, industry bodies, and research institutions involved in emergency pest and disease responses. This coordination is essential for effective containment and eradication efforts.

Responsive Decision-Making: The authority can respond swiftly to emerging threats and allocate resources promptly to mitigate the impact of new pest and disease outbreaks. This agility in decision-making is crucial for preventing the spread of threats to agriculture and the environment.

Risk Mitigation: The new authority can develop risk mitigation strategies and contingency plans, taking into account the changing landscape of pest and disease threats. This proactive approach minimizes the potential economic and environmental consequences of infestations.

Establishing a new authority to administer funding for eradicable plant and disease responses, with contributions reflected over time, is a prudent step to ensure financial transparency, equitable resource allocation, efficiency, and long-term sustainability in biosecurity efforts. Such an authority can play a pivotal role in safeguarding Australia's agriculture and environment from the threats posed by pests and diseases.

7. Improved transparency of any eradication program

Initially, the Queensland program provided public access to board minutes, an annual report, and updates regarding the funding allocation for the Red Imported Fire Ant Program. However, approximately three years ago, following adverse publicity and independent reports scrutinizing the program, this transparency was abruptly withdrawn without any official explanation. Consequently, updates regarding the program's progress and expenditures have only surfaced through sporadic ministerial statements. This lack of transparency makes it challenging for the public to discern how hundreds of millions of dollars in public funding have been utilized and allows program employees to operate without thorough scrutiny.

To illustrate, past board minutes revealed various disclosures, including instances where program members allegedly took extended two-hour lunch breaks. While these claims were attributed to mistaken identities involving different vehicles, they still raised concerns. Additionally, there were reports of erratic driving by individuals responding to fire ant incidents, leading to complaints from the public. Another puzzling expenditure was the allocation of a quarter of a million dollars for fire ant dog training when an offer for two fully trained dogs was available during the early stages of the program. The justification provided was the program's loss of a letter, which appeared questionable.

Further, during the COVID-19 pandemic, the program seemingly disregarded guidelines by requiring two operators in vehicles, with one driver and another seated in the back. Remarkably, amid lockdowns affecting the rest of the pest management industry, the fire ant program made an unusual decision to purchase 85 new vehicles. This seemingly disregarded the standard Queensland procurement policy due to the absence of an officer overseeing the process.

Regardless of potential justifications for these actions, it is imperative to emphasize transparency, particularly given the use of public funds. The Queensland Auditor General's report in March 2017 highlighted the program's inability to report on effectiveness or efficiency due to the absence of a functional information system and a lack of data on specific, measurable performance indicators.

On July 4th, 2023, the Queensland Audit Office (QAO) revisited Biosecurity Queensland's programs, specifically focusing on the National Red Imported Fire Ant Eradication Program.

The QAO reiterated its call for transparency in Biosecurity Queensland's planning decisions, acknowledging varying expert opinions on the feasibility of eradicating the pest. Additionally, it questioned the Biosecurity Online Resources and Information System's (BORIS) capability to gather data on specific, measurable program performance indicators.

Nonetheless, on July 25th, 2023, Queensland's Minister for Agricultural Industries Development and Fisheries, Mark Furner, made a significant announcement regarding the Fire Ant Program's direction, despite the absence of supporting data.

This decision followed two previously unsuccessful eradication programs (2001-2016 and 2017-2021). Minister Furner introduced a four-year 'horseshoe' containment program scheduled from 2023 to 2027.

On August 2nd, 2023, the Minister reported to the Estimates Committee in Parliament, again lacking supporting performance data. He asserted that the Fire Ant Program had successfully prevented fire ants from spreading in an arc originating from the Port of Brisbane, encompassing areas such as Mackay, Quilpie, and Sydney. However, it is essential to note that there was no data available regarding the rate of ant spread. The QAO expressed scepticism about the uniformity of the spread in all directions, suggesting that fire ants were more likely to expand along the highways leading north, south, and west out of Brisbane and in areas with suitable habitats.

Crucially, the Ministerial Council established a pivotal milestone for the National Red Imported Fire Ant Eradication Program in 2001: the implementation of a functioning information system to collect reliable and consistent performance data and report against specific, measurable performance indicators. Regrettably, this milestone was never achieved, and the program has never reported against such performance indicators. Despite this lack of data, oversight committees have consistently recommended that both state and federal governments allocate nearly $1 billion of public funds to a program lacking performance measurements. It is crucial to hold oversight committees accountable for the prudent utilisation of public funds.

8. Operational response to fire ant control

The operational response to fire ant control is a multi-level effort involving local, state, and federal governments. Local governments are on the front lines of detection and containment, with state governments providing funding and coordination, and the federal government offering additional resources, regulation, and support.

The states and territories have very different arrangements on handling biosecurity incursions in respect to organisational responsibility and the potential resources available.

For example in NSW Local Land Services are one set of organisations responsible for biosecurity. They are based upon regional areas in NSW and have little impact or coverage in major metropolitan areas.

Victoria has a State Emergency Management Plan which shares responsibility for biosecurity management between government, agencies, industries, businesses and the community.

Different skills and different equipment will be required for the potential multitude of biosecurity incursions and outbreaks from insects, rodents, disease carrying birds and mammals.

People with the appropriate accredited skills for countering the various types of biosecurity incursions should be on a localised list for immediate contact to check availability to provide immediate support for controlling or eradicating incursions in their local area. Member firms of AEPMA are obvious initial contacts. Agreements between the various jurisdiction and local governments with accredited specialists should be put in place to enhance early control or eradication.

Industry cannot stress enough the failure at all levels of government in properly administering the Fire Ant Programme. Over the two decades that have passed, there have been numerous missed opportunities and management failures. The established structure operated through a committee that did not employ staff, lacked overall budget responsibility, and purported to be a statutory authority with its own website. However, in reality, it was simply an extension of BioSecurity QLD.

Industry made it known to the Treasury and the QLD Auditor General that there were issues that needed addressing. The Department of Agriculture, together with Treasury QLD, was aware that QLD only contributed 10% of the funds to run the program. Even when questions were raised regarding operational matters, the Minister's offices did not wish to entertain complaints and instead directed them to the committee overseeing the program.

In March 2017, the Queensland Audit Office (QAO) reported that while Biosecurity Queensland was delivering program activities and outputs, it could not report on program effectiveness or efficiency due to the absence of a functioning information system and the lack of data collection on specific, measurable performance indicators.

In Canberra, the Council of Agricultural Ministers had the capacity to take action, but often, meetings were held, joint press releases were issued, and the numerous reviews conducted in the program, which highlighted the need for reform, were disregarded.

> Industry also reached out to the Federal Commonwealth Auditor General, who explained that despite the Commonwealth's expenditure of hundreds of millions of dollars, it was the state government's responsibility to manage the program, providing only 10% of the revenue. It underscores the importance of ensuring that corporate governance is just as significant in the public sector as it is in the private sector, regardless of the system in place.

9. Review of the policy of handing out free bait to members of the public

Legislation and Environmental Responsibility: A Case Against Distributing Free Bait to the Public

When it comes to addressing the issue of fire ant infestations, there has been a practice of distributing free bait to members of the public as a means of tackling nests.

However, this practice raises significant concerns from both a legal and environmental standpoint. Here are key arguments against the distribution of free bait to the public:

Legal Implications:

The Biosecurity Act 2014 designates fire ants as category one restricted matter. This classification underscores the seriousness of the issue and places specific responsibilities on how fire ant nests should be treated.

Under the Queensland Pest Management Act 2001, it is illegal for the public to treat fire ant nests. This legislation establishes a licensing regime to ensure that pest control activities are conducted by qualified pest management technicians, protecting the public from health risks associated with unqualified interventions.

Safety Concerns:

Fire ants are known for their aggressive nature and swarming behavior when their nest is disturbed. Attempting to treat the nest without proper training and equipment poses a significant safety risk to individuals.

Fire ant stings can cause extreme pain and, in some cases, result in anaphylactic shock. The potential harm to public safety cannot be understated.

Environmental Risks:

The bait provided by Biosecurity Queensland contains pyriproxyfen, a chemical with specific safety instructions for use. There is a question of whether the public will follow these instructions diligently, potentially putting themselves and the environment at risk.

Pyriproxyfen is toxic to aquatic life, and its misuse or improper disposal can harm local ecosystems. Environmental responsibility is paramount in safeguarding our natural habitats.

Ineffectiveness of Self-Treatment:

Treating fire ant nests without proper training and expertise is often ineffective. It can lead to the colony evacuating the queen and relocating to another area, perpetuating the problem instead of solving it.

Overuse and Bait Shyness:

Bait should be applied only when ants are actively foraging, in specific quantities (2-4g per 10m2), and no more than three times a year. Overuse can lead to bait-shyness among ants, rendering the bait less effective.

Environmental Contamination:

Wet conditions in regions like south-east Queensland increase the risk of bait being washed into waterways, where it can be detrimental to aquatic life. Rain or irrigation shortly after application can result in environmental contamination.

Considering these legal, safety, and environmental concerns, it is imperative to reevaluate the practice of distributing free bait to the public for fire ant eradication. Instead, a more responsible approach may involve qualified professionals administering treatments, ensuring legal compliance, public safety, and environmental protection. Additionally, the establishment of a Federal Integrity Agency could hold those responsible for national biosecurity matters accountable for their actions and decisions.

10. Operational aspects of the program should be changed to ensure that operations should, in the first instance be put out to private tender and comply with accepted government procurement policies.

There are several compelling reasons to consider private sector tendering for the eradication of fire ants and other invasive species:

Expertise and Efficiency: Private sector companies specialising in pest control and eradication often possess a high level of expertise and experience in dealing with invasive species. They can bring a wealth of knowledge, innovative techniques, and cutting-edge technology to the table. This can result in more efficient and effective eradication efforts compared to government-run programmes, which may lack specialised expertise.

Cost-Effectiveness: Private sector companies are typically motivated by cost-effectiveness and efficiency. When competing for government contracts, they strive to provide the best value for money, which can result in cost savings for taxpayers. Private companies often have the flexibility to adapt quickly to changing circumstances, potentially reducing overall project costs.

Accountability: Private sector companies usually work under stringent performance metrics and accountability measures. These companies are contractually obligated to meet specific targets and milestones, ensuring a higher level of accountability than government-run programmes. If they fail to deliver, there are financial consequences, providing a strong incentive for success.

Faster Response Times: Private sector companies can mobilise quickly to respond to outbreaks of invasive species. Their ability to deploy resources rapidly can be crucial in preventing the spread of these pests. In contrast, government agencies may face bureaucratic delays that can hinder timely responses.

Innovation and Adaptability: Private sector companies often invest in research and development to stay at the forefront of pest control technology. They can adapt quickly to changing circumstances and emerging threats, making them well-suited to tackle invasive species that may evolve over time.

Competition and Innovation: The competitive nature of private sector tendering encourages innovation and efficiency. When multiple companies bid for eradication contracts, they strive to outperform their competitors, leading to the development of new and improved eradication techniques.

Specialised Equipment: Private sector companies often have access to specialised equipment and resources that may not be readily available to government agencies. This equipment can enhance the effectiveness of eradication efforts.

Focus on Results: Private sector companies are outcome-oriented. They prioritise achieving the desired results, such as the complete eradication of invasive species, within specified timeframes. This results-focused approach can lead to more successful outcomes.

Reduced Burden on Government Resources: By outsourcing eradication efforts to the private sector, government agencies can free up resources for other critical functions. This can help governments allocate their budget and personnel more efficiently.

Public-Private Partnerships: Collaborations between government agencies and private sector companies can harness the strengths of both sectors. Public-private partnerships can leverage

government funding with private sector expertise and resources, leading to more comprehensive eradication efforts.

While private sector tendering offers several advantages, it is essential to ensure proper oversight, transparency, and adherence to environmental regulations when implementing such programmes. Additionally, a well-structured tendering process and clear contractual agreements are crucial for the success of private sector-led eradication initiatives.