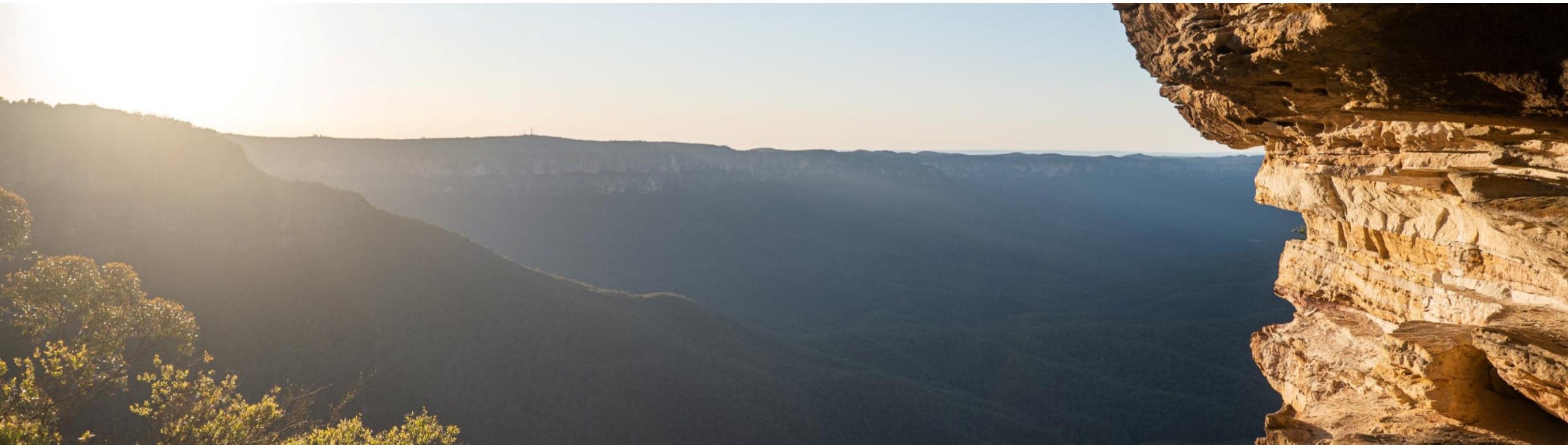


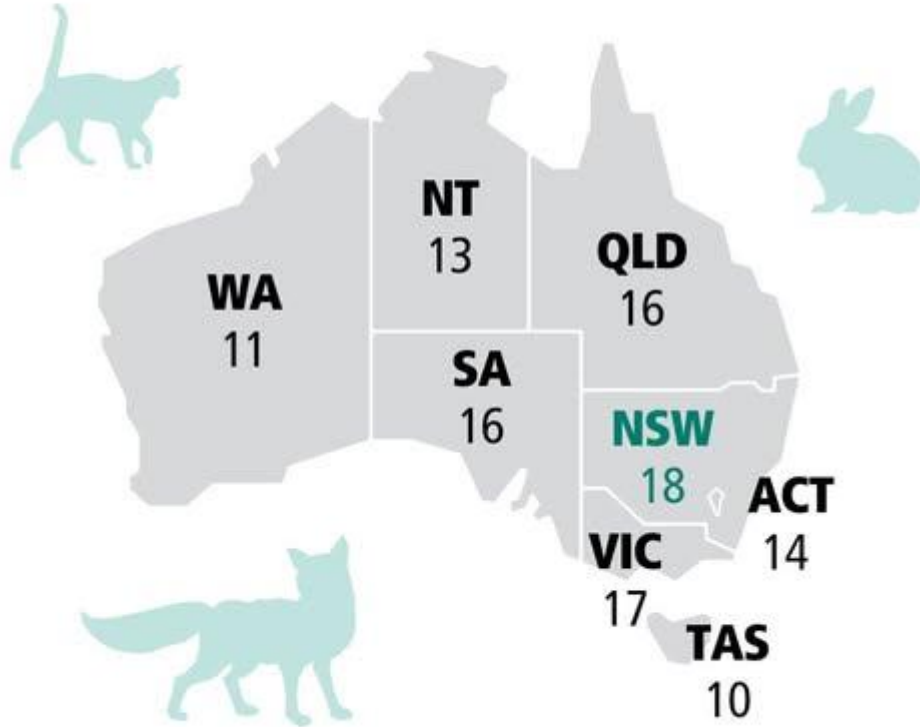
Options for Improving the Regulation of Widespread Pest Animal Management in NSW

21 October 2025

Nathan Cutter



NSW has the highest number of feral mammal species



Source: ABS, National Ecosystem Accounts, experimental estimates, 2020-21

The Scale of the Challenge

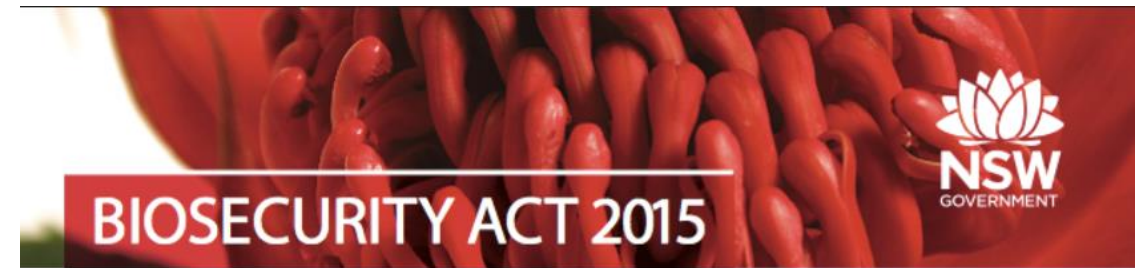
- Pest animals cost Australia over \$1 billion annually
- Wild dog, feral pig, feral deer, fox, wild rabbit, feral goat, feral cat all listed as priority pest animals for management throughout NSW
- Despite decades of investment, populations continue to expand

The Current NSW Framework



The Current NSW Framework

- Governed by the *Biosecurity Act 2015* (NSW)
- Central feature: General Biosecurity Duty (GBD)
- Requires 'reasonably practicable' measures
- lacks clarity



General Biosecurity Duty

What does the General Biosecurity Duty mean?

The General Biosecurity Duty supports the principle of shared responsibility, and means everyone is doing what is reasonable for them to do to prevent, eliminate or minimise biosecurity risks.

The Problem of Ambiguity

The Current NSW Framework

- 'Reasonably practicable' means different things to different landholders
- NSW Codes of Practice and SOPs for effective and humane management of pest animals are not mandatory
- Leads to inconsistency and weak enforcement



On-the-Ground Realities

- Fragmented responsibility across tenures
- Sub-optimal welfare and efficiencies
- Conflicts of interest
- Evidentiary burden
- Limited entry powers
- Variable motivation
- Results in inconsistent compliance



Lessons from Recent NSW Programs

Cross-tenure feral deer management

- NSW Environmental Trust-funded feral deer management program to run 2019- 2027
- Australia's largest feral deer study to protect farms and threatened wildlife
- Coordinated by NSW NPWS in collaboration with local landholders and research partners
- NRC recommended greater focus on management by private landholders.
- participation collapse due to unclear obligations



Lessons from Recent NSW Programs

Western Riverina Pest Project evaluation

WRPP objectives

1.Reduce feral pig numbers to manageable levels: reduce by 75% for each year of the program from 2016-2022.

2. For most landholders to take responsibility for maintaining feral pig numbers at these levels or reduce them further from 2022 onwards.

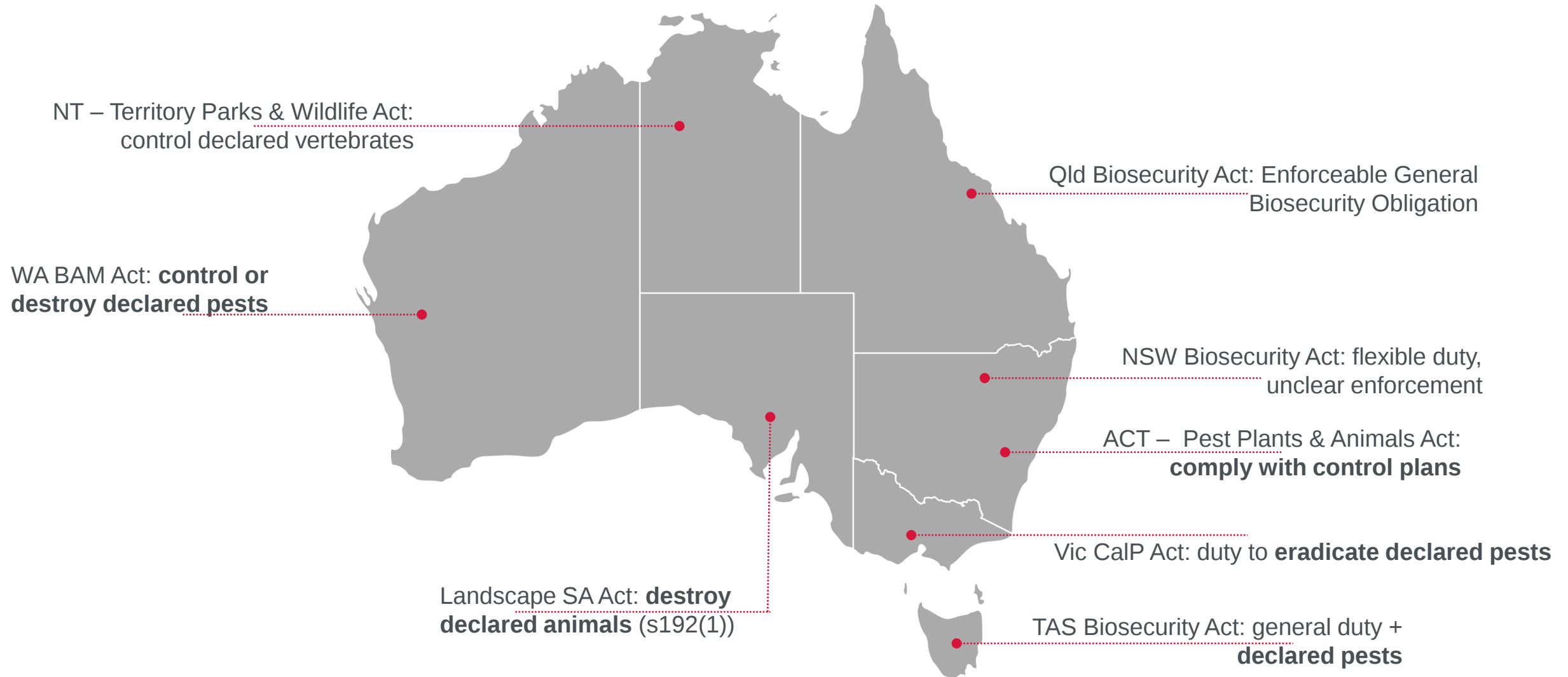
Independent evaluation:

- project reduced the feral pig population
- lack of sufficient landholder commitment
- highly unlikely feral pig numbers were reduced to below reproduction rates

	2016	2017	2018	2019	2020	2021	2022	2023	2024
Population index	4.32 pigs per km ²	11.15 pigs per km ²	2.5 pigs per km ²	0.75 pigs per km ²	3.0±1 pigs per km ²	2.4±0.8 pigs per km ²	No survey	2.9±1.0 pigs per km ²	No survey
Reported # pigs removed	7,764	10,730	15,174	3,271	1,520	8,608	2,367	3,716	9,041

Jurisdiction	Main Act	Key landholder duties / powers	Declared
NSW	<i>Biosecurity Act 2015</i>	Flexible, undefined duty; guidance via Codes of Practice (not mandatory)	Nil
Queensland	<i>Biosecurity Act 2014</i>	Everyone must take <i>reasonable and practical measures</i> to minimise biosecurity risk; clear declared pest lists	wild dog feral deer feral pig feral horse wild rabbit feral goat (regionally) fox (regionally)
Victoria	<i>Catchment and Land Protection Act 1994</i>	Landholders must take all <i>reasonable steps</i> to eradicate or control declared pest animals	feral pig wild rabbit feral cat (Crown land) feral goat fox
South Australia	<i>Landscape South Australia Act 2019</i>	Landholders <i>must destroy all declared animals</i> on their land when required by the Minister or relevant Landscape Board	wild dog feral deer feral pig wild rabbit feral goat fox
Western Australia	<i>Biosecurity and Agriculture Management Act 2007</i>	Landholders must control or destroy declared pests when issued with a pest control notice; failure is an offence	wild dog (regionally) feral deer feral cat feral pig feral horse wild rabbit feral goat fox
Tasmania	<i>Biosecurity Act 2019 (Tas)</i>	Landowners must take <i>all reasonable measures</i> to prevent, manage or eradicate declared pests	wild rabbit feral goat fox (eradication) feral pig (eradication)
Northern Territory	<i>Weeds Management Act & Territory Parks & Wildlife Conservation Act</i>	Landholders must control declared vertebrate pests and protect native fauna	wild dog feral deer (regionally) feral pig wild rabbit (regionally) feral goat
ACT	<i>Pest Plants and Animals Act 2005</i>	Landholders must comply with control plans and directions issued by Director General	wild deer wild dog feral goat wild ferret wild rabbit fox

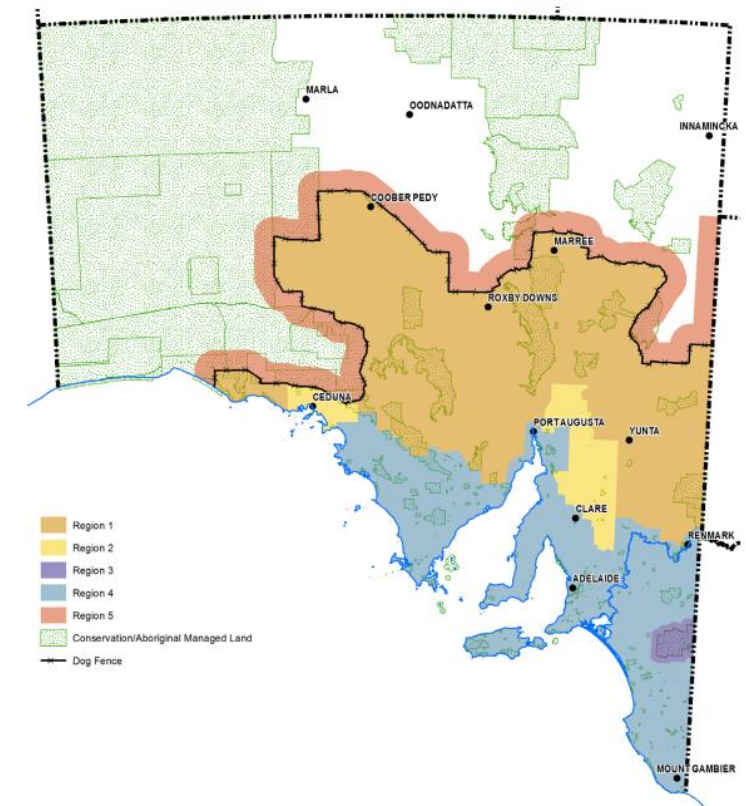
How Other Jurisdictions Do It



South Australia

Re: wild dogs and feral deer

- Owner of land must destroy all animals of a declared class:
S192(1) *Landscape South Australia Act 2019*,
- Mandatory baiting of wild dogs 2 x annually (regionally)
- Landholders must destroy feral deer
- Farmed deer regulated
 - PIC registration
 - Minimum fencing standards with inspections
 - Permanent identification
 - Reporting of escapes



Western Australia

Re: wild dogs and feral deer

- ***Biosecurity and Agriculture Management Act 2007*** S30
- Feral deer declared pest
- Wild dog declared pest
- *“An owner or occupier of land on which a declared pest is present must take such measures as are required to control the pest.”*



International Comparison

New Zealand

Biosecurity Act 2012

- No general duty: obligations built through Regional Pest Management Plans (RPMPs)
- Rules define exact duties: e.g., control rabbits below set threshold
- Site-led eradication programs for feral deer
- Clarity = accountability



Lessons from Work Health and Safety Law

- *WHS Act 2011* originally relied on 'reasonably practicable' duty
- 2025 amendments made Codes of Practice mandatory
- NSW could adopt the same model for pest management



A Behavioural Lens

- Regulation alone isn't enough
- Combine law with education, incentives, and trust
- Clear law defines the social contract for shared responsibility



Conclusion

- NSW has strong intent but weak levers
- Reform must codify best practice, clarify duties, strengthen enforcement
- When law speaks clearly, compliance follows
- Effective, humane, enforceable pest control is achievable



