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Re - Australian Weeds Strategy 2017 to 2027: consultation draft

Dear Invasive Plants and Animals Committee members

The Nature Conservation Society of South Australia (NCSSA) welcomes the opportunity to provide a submission on the Australian Weeds Strategy 2017 to 2027: consultation draft and appreciates the extension of time to enable us to do this. As South Australia's primary nature conservation advocacy organisation, NCSSA has been a long term advocate for the protection and conservation of native vegetation and biodiversity in South Australia with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities, management of protected areas and remnant native vegetation.

We provide the following responses for consideration by the Committee in finalising the Australian Weeds Strategy 2017 to 2027:

- 1. The revised strategy set out the roles and responsibilities of all stakeholders in weeds management and prevention. Are these clear? Why/why not?*

NCSSA consider the roles and responsibilities identified in the strategy are reasonably clear however strongly recommend that the Australian Government provide a greater leadership role in weed management and prevention including support for increased coordination of initiatives across jurisdictions. The current wording effectively absolves the Australian Government of any leadership responsibility and instead relies on action by state/territory governments, industry and the community. We strongly recommend a more targeted consultation process is needed if there is to be greater dependence on landholders and community groups to implement the strategy and much more attention given to providing real incentives to obtain buy-in and meaningful implementation partnerships. We also recommend that the title for the section relating to Natural Resources Management Groups is amended to Natural Resources Management Bodies that applies more broadly to organisations responsible for NRM.

- 2. Are the goals and priorities of the strategy focused in the necessary areas? Why/why not?*

NCSSA consider the goals and priorities identified in the strategy provide an adequate overview of the areas where sustained effort is required to manage the impact of weeds. We are concerned that the draft strategy contains no detailed actions or description of outcomes to be achieved through these goals and priorities. Without such information it will not be possible to evaluate what progress the strategy has made towards achieving the stated goals. The 2007 Weed Strategy contained 45 strategic actions that outlined

how the goals and objectives would be delivered and associated outcomes. We strongly recommend that the final version of the strategy include specific actions and outcomes in order to provide greater clarity to all stakeholders about the mechanisms for delivering stated goals and priorities.

3. *The strategy is intended to describe how weed management fits into Australia's biosecurity system. Is the link between Australia's biosecurity system and weed management made clear in the strategy? Why/why not?*

NCSSA consider the link between Australia's biosecurity system and weed management is made sufficiently clear in the strategy. The information contained in Figure 2 is useful in showing the context for the strategy and how it aligns with other related strategies and plans. It may be useful to refer to other National Strategies such as that for [Willow Management](#).

4. *Additional comments.*

A major shortfall of the strategy is that it fails to mention the impact of climate change on the distribution and abundance of weeds across Australia. There is a substantial amount of published scientific papers and reports that address these matters and, given the 10 year timeframe covered by the revised strategy, it is imperative that the strategy consider this issue as a high priority in terms of weed control and management.

Page 6: The impact of weeds in Australia - Environment

The statement that weeds "impact negatively on native fauna and flora" needs further qualification. There are some instances where weed infestations provide useful habitat and protection from grazing by stock. For example in the Adelaide Hills, Southern Brown Bandicoots often use thick stands of Blackberry, Gorse, Broom, African Boxthorn and Bracken. Traditional management of these weeds involves broadscale clearance by burning, spraying or manual clearing. The loss of these species from areas where they form a dense mass and dominant understorey composition may result in the removal of alternative habitat for Southern Brown Bandicoots in a modified landscape. Similar impacts apply to small woodland birds such as Wrens and Thornbills that utilise Blackberry, Gorse and African Boxthorn as nesting habitat.

We recommend that this section acknowledge that there are currently 3 weed related issues listed as Key Threatening Processes under the EPBC Act, namely;

- Invasion of northern Australia by Gamba Grass and other introduced grasses;
- Loss and degradation of native plant and animal habitat by invasion of escaped garden plants, including aquatic plants; and
- Novel biota and their impact on biodiversity.

A key area of concern for NCSSA is the impact of pest plants and methods used for their control on native vegetation, in particular areas that provide habitat for nationally, state and regionally rare listed species and threatened ecological communities. We feel it important for the strategy to acknowledge the impacts on biodiversity that arise from not only the invasion of new pest plants or animals but also the broader effects of established exotic species. NCSSA strongly recommend that proper consideration is given to the potential impacts of any proposed control efforts for either new incursions or established species. This is of particular concern where non-selective, 'agricultural' pest plant control techniques are employed, such as broad acre spraying of weed infestations in native vegetation. We urge proper consideration of potential impacts of proposed control actions and the use of control methods that are selective for the pest plant and that do not cause off-target damage to native biota.

Page 7: Primary weed-spread pathways

The last sentence of the 3rd paragraph states that "Railway corridors and roadsides are also important dispersal pathways for agricultural and environmental weeds." We recommend the strategy acknowledge that in many agricultural areas roadsides and rail corridors also provide important remnant habitat for native vegetation. Any weed control programs conducted in these areas need to be undertaken with care and due diligence to avoid inadvertent damage to native species.

Pages 28-29: Appendix A: National weed management achievements and lessons

We recommend the information in Appendix A would be clearer if presented as achievements against specific goals and objectives rather than under broad subheadings. This would enable stakeholders to see where progress has been made since the 2007 Strategy and areas where continued resources and effort are required under the current strategy.

As noted in the Final Evaluation Report for the 2007 APAS, and also of relevance to the AWS, many of the identified actions are either ongoing or would take significant time to achieve. We strongly advocate that the Strategy identify actions that might be achievable over the next 2, 5 and 10 years in order to prioritise effort accordingly.

Pages 30-32: Appendix B: Weeds of national significance (WONS)

We recommend that hyperlinks are included to the [Australian Government website](#) and to the WONS listed in this section to provide stakeholders with up to date access to relevant information regarding distribution, impact, management and other related resources. For example [Athel pine](#) and [Bridal Creeper](#).

We trust that the comments and recommendations in this submission will be duly considered and of assistance in finalising the Strategy. If you would like to clarify or discuss any of the points raised please contact me on

Yours sincerely,



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