



Environmental Biosecurity Office
Established Pest Animals and Weeds Section
Department of Agriculture, Water and the Environment
CANBERRA, ACT 2601
By email: pestanimals&weeds@agriculture.gov.au

2 May 2022

Dear Environmental Biosecurity Office,

RE: Submission to the draft National Established Weeds Priorities Framework

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission to the Federal Government's consultation on the draft *National Established Weeds Priorities Framework*.

Please note that ALCA is happy for this submission to be published in full.

About the Australian Land Conservation Alliance

ALCA represents Australia's leading land restoration and conservation organisations working with landholders on privately owned and managed land across Australia. Together, ALCA's members represent a substantial and growing voice in Australia's land management sector. Our eleven members are:

- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Bush Heritage Australia
- Greening Australia
- Landcare Australia
- Nature Foundation
- Queensland Trust for Nature
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)

ALCA land conservation efforts stretch across over 3 million square kilometres with more than 3,000 landholders. We have over 50,000 supporters and our combined annual turnover exceeds \$200 million. Together we work to support some of the most pressing conservation issues across the country – including tackling invasive species and weeds and managing national environmental biosecurity threats, restoring endangered ecosystems, mitigating the impacts of climate change, and building the protected area estate.

Through their active land management, ALCA member organisations are deeply embedded in regional communities and economies, providing jobs, securing significant regional investment, and safeguarding remaining native habitat for the local community with its many positive spillover effects for agriculture.

Some ALCA members are statutory entities; the views expressed in this submission do not necessarily represent the views of the Government administering those statutory entities.

Summary

Directly and indirectly, ALCA's member organisations are helping to combat weeds across over 3 million square kilometres of Australia and with more than 3,000 landholders; managing the threat of weeds to our natural environment is a key component of the work that our members undertake on a daily basis.

Many of our worst weeds are agricultural pasture grasses that are still promoted and widely used – for example, gamba, buffel, and Phalaris, to name but a few. The responsibility for addressing these agricultural pasture grass weeds is not always squarely addressed by agricultural departments and biosecurity efforts across Australia.

For these reasons, ALCA welcomes any initiative that has the potential to improve the focus, coordination and collaboration of key organisations and their resources in combatting Australia's most environmentally destructive weeds.

Recommendations

1. The importance and relevance of climate change is completely absent from the draft Framework; **the impact of climate change upon shared weed priorities – including how they are determined and addressed – should be explicitly outlined in the Framework.**
2. **It is unclear how the Framework will be used in practice alongside existing and emerging environmental planning mechanisms** – the current language of *“The Framework will consider and complement jurisdictional, regional and local weed priorities and management objectives.”* (Guiding principles, page 4) falls into the confusing trap of the document trying to describe itself, rather than providing guidance on how it will deliver on these objectives. Another example is that whilst regional planning is currently identified in the draft Framework, how the two will operate in tandem is not addressed in detail¹.
3. The use of the language *“All threats are considered”* within the Guiding principles (page 4) is to be applauded and retained, especially if it can **prevent the exclusion of agriculturally important plants** (including agricultural grasses as referred to in the Summary above) that are threats to other sectors.
4. Native plants should indeed be excluded from the Framework as native plants that become pests are usually localised in their impact and thus do not require a national approach to their management.
5. EPDNS Criteria 2 (Table 1, page 8) should include a reference to coordinating research and development, as explicitly described in the EPDNS itself: *“For a high impact established pest or disease of national significance, the absence of feasible management methods may be grounds for coordinated research and development. In that case an established pest or disease of national significance could be recognised as nationally significant for the purposes of research and development and not for coordinated on-ground management.”*²
6. **The development of a Virtual Weed Information Hub should be applauded and retained;** properly resourced, it will be very useful for land managers to ensure best practice management techniques are implemented wherever possible. **With financial assistance, ALCA members would be willing and able to contribute their deep expertise to this Hub.**

¹ Other than *“The NEWP Framework is not intended to... override local or regional plans or strategies”*; see: p3, *National Establish Weed Priorities – Draft Framework*, March 2022.

² p13, *National Framework for the management of established pests and diseases of national significance*, National Biosecurity Committee, 2016; see: <https://www.awe.gov.au/sites/default/files/sitecollectiondocuments/biosecurity/framework-pests-diseases.pdf>

7. The timeframe for determining national priority actions for the National Established Weed Action List (NEWAL) should be considered carefully as it is unclear whether the short, one-to-two-year timeframe for completion is realistic or not.
8. **The NEWP Steering Group would be greatly assisted by a representative from the private land conservation sector;** ALCA would be happy to assist in the Government's selection of a suitable representative.

Thank you again for the opportunity to contribute to the Federal Government's consultation on the draft *National Established Weeds Priorities Framework*.

ALCA looks forward to an ongoing engagement with the Government to scale up effective efforts to prevent, eradicate, contain, and manage weeds and improve our protection of Australian biodiversity.

Australian Land Conservation Alliance