

23 May 2014

Paul Murphy
Assistant Secretary
Wildlife Trade and Biosecurity Branch
Department of the Environment
By email: weeds@environment.gov.au

***Preparation of Threat Abatement Plan for Key Threatening Process:
invasion of escaped garden and aquatic plants***

Dear Mr Murphy,

Thank you for seeking our views on this matter.

We strongly recommend that a threat abatement plan be prepared for the Key Threatening Process 'Loss and degradation of native plant and animal habitat by invasion of escaped garden plants, including aquatic plants'.

Please refer to pages 13 and 14 of our 2009 submission to the nomination of this key threatening process (attached) for our views on this subject. The reasons outlined then still apply.

The threat of weeds to biodiversity continues to grow. The main policy tools that were relied upon to justify not proceeding with a threat abatement plan have been ineffective at abating the threat of escaped garden and aquatic plants. The independent Hawke review of the EPBC Act confirmed this. It found that the several thousand plant species persisting as ornamentals or as naturalised populations in urban areas "represent a vast reservoir of potential future problems" and that their movement within Australia "is effectively unconstrained". State and territory responses were criticised as representing "a substantial failure of state and territory-based environmental regulation".¹

The Australian Weeds Strategy was prepared by the Australian Weeds Committee and adopted by the Natural Resources Management Ministerial Council in 2007. While it had laudable goals and some important work was carried out under the plan, it has not led to systematic identification and closing of pathways for weed establishment and spread. While some of the systems in place for managing weeds

¹ Hawke A. 2009. *The Australian Environment Act: Report of the Independent review of the Environment Protection and Biodiversity Conservation Act 1999*. Department of the Environment, Water, Heritage and the Arts, Australian Government.

have improved, new weed species continue to escape into the environment and existing weed species continue to spread.

In the 2014-15 budget, the Federal Government announced that it would abolish the Australian Weed Committee and combine its work with other abolished entities such as the National Biosecurity Committee. It is now unclear what intergovernmental processes will continue this work.

Changes proposed by the nursery industry to date have been voluntary and have had limited uptake. Many nurseries and other plant sellers around Australia continue to sell known or potentially weedy plant species. Many pathways for potential new weeds are expanding, such as internet sales of seeds and plants. Only Western Australia has a strong preventative approach through a permitted list approach that limits the introduction of new species to those assessed as low-risk.

The Australian Weeds Strategy does not specifically address aquatic weeds. In 2008, Land and Water Australia funded a project to conduct a risk assessment of aquatic weeds, and recommendations to limit the sale of high risk species was made to the Australian Weeds Committee in the same year. The Australian Weeds Committee has taken no coordinated action since this time.²

We believe the threat remains at least as serious, if not greater than at the time the threatening process was listed and the rationale for a threat abatement plan is strong.

Please contact me on 0438 588 040, 03 8060 5198 (w) or email andrewcox@invasives.org.au

Yours sincerely



Andrew Cox
CEO

Attached: Invasive Species Council submission to listing of escaped garden plants as a Key Threatening Process: Submission in response to the nomination 'Loss and degradation of native plant and animal habitat by invasion of escaped garden plants, including cultivated and aquatic plants', April 2009.

² NSW Natural Resources Commission 2014. *Weeds – Time to get serious: Review of weed management in NSW*. Draft report. Feb. Sydney.