



## Contact Details

### Name

Select your Title **(required)**

First name **(required)**

Last name **(required)**

### Contact

Email **(required)**

Phone number **(required)**

Postcode

### Stakeholder Group

Select the stakeholder group  
that best represents you  
**(required)**

## Question 1

**The revised strategy sets out the roles and responsibilities of all stakeholders in weed management and prevention. Are these clear?**

The current draft Strategy does not reflect the national and state shift towards collaborative networks and everyone being responsible for managing their own biosecurity risk. There needs to be increased recognition that other co-existing land users such as the resource sector and public utilities also play an important role in weed prevention and management.

Recommend the following changes to Roles and Responsibilities:

Landholders (public and private) and co-existing land users

[Insert text]

- Identify and manage all biosecurity risks, including risks associated with goods, vehicles and people entering the property.

- Implement weed seed hygiene procedures to minimise establishment or spread of high risk weed species.

[Delete or reword]

- Understand the need for multiple species approaches and the cause and effect relationships that apply to weed problems.

## Australian Government

[Insert text]

- Provides leadership and coordination for emergency responses to weed incursions of national significance.
- Provides a legislative framework, including biosecurity and environmental legislation to minimise risk of pre-border and border weed incursions by undertaking Biosecurity Import Risk Assessments (BIRA's), first point of entry inspections, enforcement and regulatory actions where necessary.
- Maintain a national network of skilled biosecurity officers trained in detection of new weed incursions at first points of entry and across Northern Australian borders.
- Oversee pesticide regulation and safety processes to enable minor use permits for new weed incursions.

## State and territory governments

[Insert text]

- Lead and coordinate emergency responses to priority weed incursions of state significance and take all reasonable steps to eradicate State prohibited weeds.
- Statutory functions to declare or revoke the scheduled list of noxious (prohibited or restricted) weeds.
- Manage weed problems on government land, state managed corridors and waterways, in cooperation with other landowners.
- Undertake enforcement and regulatory actions with individual landholders only when necessary to support eradication of a localised new incursion or sustained management of widely established weeds by industry or community.
- Maintain state processes to appoint authorised biosecurity officers who can issue biosecurity certificates, inspect premises or goods for weed incursions and set up biosecurity response zones.
- Oversee the state processes and regulations for the responsible storage, transport, application and disposal of herbicides, including agricultural chemical distribution licences

## Local government

[Insert text]

- Planning, regulatory, surveillance and monitoring role for invasive weed management.
- Manage weed problems on local government land and shire roads, in a responsible way, in co-operation with other landowners.
- Appoint authorised biosecurity officers who can issue biosecurity orders and increase weed risk awareness.

## Industry, land use and community groups

[Insert text]

- Lead, promote and participate in collective action based on industry or community needs at a local, regional or national level to mitigate impacts of established weeds of 'national significance' and/or industry significance.
- Build weed risk mitigation measures into normal industry practices (for example – quality assurance programs, best management practice programs, industry and land use networks that develop farm biosecurity planning)
- Develop land use agreements and weed hygiene protocols to reduce risk of weed spread by multiple land users, such as resource, transport and public utility industries.
- Develop, collaborate and promote weed risk checklists and regional /catchment /property biosecurity management plans

## Regional natural resource management groups

[Insert text]

- Represent community interests in weed management, especially for environmental weeds and /or weeds affecting environmental natural resources and assets.

## AgChem companies and commercial resellers

[Insert text]

- Important source of continuously updated information on weed and herbicide management options and stewardship programs
- Provide ongoing research and development into weed control options and application methods for weeds causing significant economic losses
- Implement AgSafe national stewardship for accreditation of agchem supply premises; training of staff in safe handling and supply of agvet chemicals; drumMUSTER recycling of agchem containers and ChemClear disposal of unwanted agvet chemicals

## Weed contractors and consultants

[Insert text]

- Important source of current information and best practice actions on weed and herbicide management
- Provide weed identification and weed reporting services
- Provide landholder and land user training in agvet chemical handling and weed management methods
- Continuously improve application methods and innovative weed management techniques

## Aboriginal and Torres Strait Island indigenous rangers

[Insert text]

- Provide biosecurity surveillance across northern Australia

## Question 2

### Are the goals and priorities of the strategy focused in the necessary areas? why / why not?

The maximum Return on Investment and most future effort should be focused on Goal 1- prevention, detection and early intervention.

In regards to Goal 2 – minimise impacts of established weeds, AgForce questions the ongoing commitment to Weeds of National Significance (WoNS) as a national coordination process. Many of the current web links to the WoNS Strategic Plan, WoNS determination processes and Weeds Australia website are no longer active. All the WoNS Best Practice Manuals for each nominated weed have disappeared off websites. This rigorous collaborative work on best practice needs to be continuously improved rather than lost out of all systems. Activity on WoNS has declined, since the launch of WoNS weed management guides and the transition to Phase 3 in 2013. Industry has no confidence the existing WoNS plans and WoNS lists will be reviewed over time, unless the draft Australian Weeds Strategy commits to a process and timeline within Priority 2.1. Appendix B alluded to 28 weeds on the National Environmental Alert List as possible candidates for WoNS. AgForce recommends future WoNS need to be assessed against environment and economy criteria, in addition to biodiversity criteria.

AgForce recommends the National Biosecurity Committee increase awareness of the National Established Pests and Diseases of National Significance (EPDNS) Management Framework, since the review in 2015. What is the timeframe and process to assess if other problematic weeds such as the weedy *Sporobolus* grasses (giant rats tail grass and Parramatta grass, etc) meet the criteria of 'national significance'? Does the EPDNS framework apply to broadacre cropping weeds which are potentially developing herbicide resistance such as feathertop Rhodes grass and fleabane? What will be the public consultation and engagement process for the EPDNS assessment of future weeds?

#### Priority 2.3 Weed Containment

AgForce agrees that a few landholders should not bear the cost of localised containment or eradication, where there is wider stakeholder or community benefit. AgForce recommends exploring the feasibility of a national biosecurity tax or levy paid by all community members and visitors to Australia. This would also assist in developing a culture that 'everyone has an obligation towards managing biosecurity risk'. A national biosecurity levy would enable cost-sharing and affordable rapid response to new or spreading biosecurity incursions that threaten economy, environment or human or animal health.

#### Priority 2.4 Enhance weed control techniques

[Insert text]

- Nationally coordinated approaches to selecting new biological control agents and new genetic or breeding technologies

#### Priority 3.1 Develop knowledge

[Insert text]

- Provide weed management modules within school curricula to entrench a duty of care about weeds across the wider community and future younger generation land holders.

#### Priority 3.2 Maintain RD&E

[Insert text]

- RD&E for integrated weed management using appropriate combinations of mechanical, chemical, plant competition, fire and other methods
- Maintain awareness of weed potential of certain herbs, forbs, aquatic plants across multi-cultural communities, plant nursery industry, aquarium industries and internet importers

#### Priority 3.3 National data

[Insert text]

- Work towards one shared database for weed location data such as Australia's Virtual Herbarium (<http://avh.ala.org.au>). Currently there are too many disjointed databases for weed location and spread data.
- Improve extension and awareness of existing national databases on current outbreaks of national significance (eg. [www.outbreak.gov.au](http://www.outbreak.gov.au)) and naturalised weeds (eg. Australia's Virtual Herbarium <http://avh.ala.org.au>). Include links to these national tools in state and regional biosecurity training modules

#### Priority 3.4 Improve decision support resources

Future systems need to maintain flexibility and regional relevance to environment and industries in readiness to respond to future biosecurity risks. Future systems involve collaborative networks where national criteria may not be applicable.

Rather than developing consistent national criteria for government involvement, AgForce recommends changing the proposed action to:-

[Insert amended text]

- Maintain flexibility in assessment criteria and approaches to guide government and other stakeholder involvement
- Resources, expertise and knowledge shared across relevant government and stakeholder groups to support effective detection and response processes
- Foster improved collaboration by including other stakeholder groups with government on the Invasive Plants and Animals Committee

## Question 3

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**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?**

The national Biosecurity Act 2015 and Queensland Biosecurity Act 2014 refer to biosecurity monitoring and response zones to prevent entry and manage new incursions. Goal 1 in the draft Australian Weeds Strategy could improve alignment to these new legislated biosecurity measures for prevention and early intervention.

The importance of protecting Australia's coastline from future weed incursions needs to be highlighted. The Northern Australia Biosecurity Framework (NABF) is an effective collaboration between northern communities (especially Aboriginal and Torres Strait Islander communities), government and industry to safeguard 10,000 km coastline from biosecurity risks through improved surveillance for targeted risk species. Within NABF, the Northern Australia Quarantine Strategy (NAQS) also monitors cargo and people movement through Torres Strait.

## Comments / Feedback

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**Any other comments or feedback?**

The scope of the Strategy (page 3) needs to clearly articulate if the Strategy only applies to introduced weeds only, or native weeds are also considered. For producers, there are several native weeds that also fit the Strategy's definition of a 'weed'. For example, toxic native weeds such as Pimelea species, heartleaf poison bush (*Gastrolobium grandiflorum*) require action such as control or stock exclusion. Native woody plants thickening over time such as breadfruit (*Gardenia vilhelmsii*), gutta-percha (*Excoecaria parvifolia*) and currant bush (*Carissa ovata*) require action to restore tree-grass balance and biodiversity.

The seven principles of weed management (page 4) do not recognise the importance of co-existing with multiple land users. The growth of the resource sector (mining and coal seam gas), transport and tourism sector has resulted in multiple visits and uses to the same land parcel, in addition to the 'landholder'. Weed management capability also requires knowledge and skills in efficient weed management methods. Suggest amending three of the seven principles to:-

(1) Effective weed management is a responsibility shared between landholders, land users, community, industries and government.

(5) Coordination amongst landholders, land users, community, industries and governments is necessary to manage weeds at a landscape and/or catchment scale.

(6) Sustaining capability, capacity and knowledge of cost-effective management methods across landholders, land users, community, industries and governments is fundamental to effective weed management.

## BACKGROUND

Who is AgForce?

AgForce is the peak state farming organisation representing the majority of beef, sheep and wool, and grain producers in Queensland. The gross value of these agricultural commodities in Queensland for 2014/15 totalled \$6.3billion which included \$1.15billion for broadacre cereal, oilseed and pulse crops, \$5.14billion for slaughtered cattle and sheep and \$66million for wool. AgForce exists to ensure the long term growth, viability, competitiveness and profitability of these industries. Our members provide high-quality food and fibre products to Australian and overseas consumers, manage more than 50% of the Queensland landscape, and contribute significantly to the social fabric of rural and remote communities.

Biosecurity risks due to diseases, weeds and feral animals are one of the greatest threats to the red meat and cropping industries. Crop diseases and weed seed contamination threaten the productivity and export trade for broadacre grain crops. Prevention of new weed biosecurity incursions is paramount for Australian agriculture. Existing weeds are at risk of spreading due to factors such as globalisation, rapid movement of trading stock and fodder, co-existence between multiple land uses, variable tropical climate and reduced understanding of agricultural issues by urban communities. Biosecurity business has recently changed nationally and statewide, with new legislation commencing in 2016. The challenge ahead is to develop a culture that 'biosecurity is everyone's business' and empower shared responsibilities between all sectors.

The recent review of key policy instruments such as the Intergovernmental Agreement on Biosecurity, Established Pests and Diseases of National Significance Framework and Queensland's Weed and Pest Animal Strategy 2016 to 2020 and now the Australian Weeds and Pest Animal Strategies 2017 to 2027 should all link together, be living documents and provide pathways to priority outcomes.

In this submission, AgForce has provided responses to the four questions pertaining to roles, goals, linkages and other comments.

## Attach a document

File formats allowable are .doc, .docx or .pdf with a maximum file size of 5 MB.

You can upload a document by:

Dragging and dropping onto the upload attachment box

or

by selecting the upload attachment button and browsing to the file on your computer

File: AgForce submission to Aust Weeds Strategy Review\_20161014.pdf

# Submission

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Yes  No

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Yes  No

### Do you consent for the department to contact you about your submission, if required? (required)

Yes  No



## **AgForce Queensland Industrial Union of Employers**

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12 October 2016

Review of the draft Australian Weeds Strategy 2017 to 2027

Department of Agriculture and Water Resources

Australian Government

Online submission form:-

<https://online.agriculture.gov.au/dawr/servlet/SmartForm.html?formCode=weeds>

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In this submission, AgForce has provided responses to the four questions pertaining to roles, goals, linkages and other comments.

For further information, please contact AgForce on 07 32363100 or email [agforce@agforceqld.org.au](mailto:agforce@agforceqld.org.au)

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<sup>1</sup> Australian Bureau of Statistics – Value of Agricultural Commodities Produced 2014-15  
<http://www.abs.gov.au/ausstats/abs@.nsf/mf/7503.0>

**Question 1:**

**Are the roles and responsibilities of all stakeholders in weed management and prevention clear in the Revised Strategy? How to strengthen community involvement?**

The current draft Strategy does not reflect the national and state shift towards collaborative networks and everyone being responsible for managing their own biosecurity risk. There needs to be increased recognition that other co-existing land users such as the resource sector and public utilities also play an important role in weed prevention and management.

Recommend the following changes to Roles and Responsibilities:

**Landholders (public and private) and co-existing land users**

*[Insert underlined text]*

- Identify and manage all biosecurity risks, including risks associated with goods, vehicles and people entering the property.
- Implement weed seed hygiene procedures to minimise establishment or spread of high risk weed species.

*[Delete or reword]*

- ~~Understand the need for multiple species approaches and the cause and effect relationships that apply to weed problems.~~

**Australian Government**

*[Insert underlined text]*

- Provides leadership and coordination for emergency responses to weed incursions of national significance.
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- Oversee pesticide regulation and safety processes to enable minor use permits for new weed incursions.

**State and territory governments**

*[Insert underlined text]*

- Lead and coordinate emergency responses to priority weed incursions of state significance and take all reasonable steps to eradicate State prohibited weeds.
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- Manage weed problems on government land, state managed corridors and waterways, in cooperation with other landowners.
- Undertake enforcement and regulatory actions with individual landholders only when necessary to support eradication of a localised new incursion or sustained management of widely established weeds by industry or community.
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### **Local government**

*[Insert underlined text]*

- Planning, regulatory, surveillance and monitoring role for invasive weed management.
- Manage weed problems on local government land and shire roads, in a responsible way, in co-operation with other landowners.
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### **Industry, land use and community groups**

*[Insert underlined text]*

- Lead, promote and participate in collective action based on industry or community needs at a local, regional or national level to mitigate impacts of established weeds of 'national significance' and/or industry significance.
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- Develop, collaborate and promote weed risk checklists and regional /catchment /property biosecurity management plans

### **Regional natural resource management groups**

*[Insert underlined text]*

- Represent community interests in weed management, especially for environmental weeds and /or weeds affecting environmental natural resources and assets.

### **AgChem companies and commercial resellers**

*[Insert underlined text]*

- Important source of continuously updated information on weed and herbicide management options and stewardship programs
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### **Weed contractors and consultants**

*[Insert underlined text]*

- Important source of current information and best practice actions on weed and herbicide management
- Provide weed identification and weed reporting services
- Provide landholder and land user training in agvet chemical handling and weed management methods
- Continuously improve application methods and innovative weed management techniques

### **Aboriginal and Torres Strait Island indigenous rangers**

*[Insert underlined text]*

- Provide biosecurity surveillance across northern Australia

**Question 2:**

**Are the goals and priorities in the strategy focused in necessary areas?**

The maximum Return on Investment and most future effort should be focused on **Goal 1- prevention, detection and early intervention.**

In regards to **Goal 2 – minimise impacts of established weeds**, AgForce questions the ongoing commitment to Weeds of National Significance (WoNS) as a national coordination process. Many of the current web links to the WoNS Strategic Plan, WoNS determination processes and Weeds Australia website are no longer active. All the WoNS Best Practice Manuals for each nominated weed have disappeared off websites. This rigorous collaborative work on best practice needs to be continuously improved rather than lost out of all systems. Activity on WoNS has declined, since the launch of WoNS weed management guides and the transition to Phase 3 in 2013. Industry has no confidence the existing WoNS plans and WoNS lists will be reviewed over time, unless the draft Australian Weeds Strategy commits to a process and timeline within Priority 2.1. Appendix B alluded to 28 weeds on the National Environmental Alert List as possible candidates for WoNS. AgForce recommends future WoNS need to be assessed against environment and economy criteria, in addition to biodiversity criteria.

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**Priority 2.4 Enhance weed control techniques**

*[Insert underlined text]*

- Nationally coordinated approaches to selecting new biological control agents and new genetic or breeding technologies

**Priority 3.1 Develop knowledge**

*[Insert underlined text]*

- Provide weed management modules within school curricula to entrench a duty of care about weeds across the wider community and future younger generation land holders.

**Priority 3.2 Maintain RD&E**

*[Insert underlined text]*

- RD&E for integrated weed management using appropriate combinations of mechanical, chemical, plant competition, fire and other methods

- Maintain awareness of weed potential of certain herbs, forbs, aquatic plants across multi-cultural communities, plant nursery industry, aquarium industries and internet importers

### Priority 3.3 National data

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- Work towards one shared database for weed location data such as Australia's Virtual Herbarium (<http://avh.ala.org.au>). Currently there are too many disjointed databases for weed location and spread data.
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### Priority 3.4 Improve decision support resources

Future systems need to maintain flexibility and regional relevance to environment and industries in readiness to respond to future biosecurity risks. Future systems involve collaborative networks where national criteria may not be applicable.

Rather than developing consistent national criteria for government involvement, AgForce recommends changing the proposed action to:-

*[Insert amended text]*

- Maintain flexibility in assessment criteria and approaches to guide government and other stakeholder involvement
- Resources, expertise and knowledge shared across relevant government and stakeholder groups to support effective detection and response processes
- Foster improved collaboration by including other stakeholder groups with government on the Invasive Plants and Animals Committee

#### Question 3:

**Is the link between Australia's biosecurity system and weed management clear in the Strategy?**

The national Biosecurity Act 2015 and Queensland Biosecurity Act 2014 refer to biosecurity monitoring and response zones to prevent entry and manage new incursions. Goal 1 in the draft Australian Weeds Strategy could improve alignment to these new legislated biosecurity measures for prevention and early intervention.

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**Question 4:**  
**Other comments**

The **scope** of the Strategy (*page 3*) needs to clearly articulate if the Strategy only applies to introduced weeds only, or native weeds are also considered. For producers, there are several native weeds that also fit the Strategy's definition of a 'weed'. For example, toxic native weeds such as *Pimelea* species, heartleaf poison bush (*Gastrolobium grandiflourm*) require action such as control or stock exclusion. Native woody plants thickening over time such as breadfruit (*Gardenia vilhelmii*), gutta-percha (*Exoecaria parvifolia*) and currant bush (*Carissa ovata*) require action to restore tree-grass balance and biodiversity.

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-