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Nature Conservation Saves for Tomorrow

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Independent Biosecurity Commissioner

NSW Government

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Administrative reform of environmental weed management Blue Mountains NSW

I am writing to you on behalf of the Blue Mountains Conservation Society. The Society is comprised of over 900 members and seeks to protect, conserve and advocate for the natural environment of the Greater Blue Mountains. The Society takes a strong interest in the management of environmental weeds in the Blue Mountains.

The Society wishes to advise you, as the Independent Biosecurity Commissioner NSW, of our recent experiences with environmental weed management and administration in the Blue Mountains, and the need for reform of the current regional and state management regime. The Society presents several recommendations for your consideration.

The Society has considered the recently released invasive species review document *Reducing Risk, Securing the Future NSW Invasive Species Management Review Preliminary Report August 2024* (aka Review 2024).

Environmental weeds in the Blue Mountains

Environmental weeds can be found in all four Blue Mountains major land use groups:

- NPWS managed national parks and the Greater Blue Mountains World Heritage Area (GBMWH);
- bushland reserves managed by Blue Mountains City Council (BMCC), Sydney Water asset protection zones and semi-rural properties;
- urban areas largely managed by BMCC;
- a central transport corridor managed by Transport NSW.

NPWS national parks and the Greater Blue Mountains World Heritage Area (GBMWH)

The internationally significant GBMWH is comprised of eight national parks and protected areas managed by the NPWS. The Society notes that UNESCO has listed invasive plants as a threat to the integrity of the GBMWH. Environmental weeds have potential to compromise GBMWH placement on the World Heritage List. (See <https://whc.unesco.org/en/list/917/>.) Climate change impacts may seriously exacerbate the spread

and degrading effects of environmental weeds in the GBMWHA.

The temperate climate and relatively high rainfall of the Blue Mountains promotes vigorous growth of and seeding by introduced plant species. It is relatively easy for environmental weed seed produced along the central transport corridor and in urban areas to find its way into the GBMWHA. Spread of environmental weed seed into the GBMWHA occurs because the seed and other propagules of weeds are widely distributed by wind, water (particularly gravity fed transportation by stormwater and streams), human action and other animals, particularly birds.

Although the situation does not appear to be critical, as yet, environmental weeds have become well established within many GBMWHA sectors, primarily those located adjacent to the urban areas and bushland reserves. Environmental weeds have particularly infested vulnerable ecological community *Blue Mountains Swamps*, stream riparian zones, highly valued Eucalypt forests (the basis of the World Heritage listing) and Temperate rainforests. Environmental weeds destroy the habitat of indigenous wildlife.

The NSW National Parks and Wildlife Service (NPWS) engages in national park and GBMWHA weed management work, by employing professional field workers and supporting NPWS volunteer Bushcare groups with trained field officers.

Urban areas and adjoining bushland reserves

Major concentrations of weeds can be found in the urban areas and adjoining bushland reserves managed by BMCC. This can include gardens and larger private properties, streams and riparian zones, within swamps, and within BMCC managed bushland reserves.

In accordance with the *Biosecurity Act 2015* (NSW), BMCC is the Local Control Authority, and has a legal obligation to manage the biosecurity risk posed or likely to be posed to human health, the economy, community and environment by Priority Weeds and other listed environmental weeds.

Relative to most Sydney councils, BMCC has a very small operational budget, but a physically large LGA to manage.

To manage the threat posed by environmental weeds, BMCC undertakes weed eradication, management and education programs. The council operates a Natural Area Management Team that implements these programs. The council maintains weed information and management websites. The council employs a Bush Regeneration Team (natural area restoration), a Weed Management Team (direct weed management including high volume spraying), and a Bushcare Team (managing volunteer bush carers). The Bushcare Team supervises the activities of an exceptionally large and active Bushcare program, involving approximately sixty volunteer groups and approximately 600 resident volunteer bush carers. Commencing in approximately 1990, the volunteer bush carers of the Blue Mountains have undertaken some quite exceptional weed management work, and natural area restoration projects.

Despite these various measures, the Society is of the opinion that a far more extensive BMCC weed management program is required, to adequately manage the current situation. For example, the Society is aware of situations where threatened ecological community, *Blue Mountains Swamps*, is currently highly degraded by weeds such as Arum lily, Japanese Honeysuckle, and Blackberry. The council's low operational budget is a contributing factor to this situation.



Rocklea Swamp Hazelbrook infested with Arum lily November 2024

Photo: BMCS

Transport NSW urban transport corridor

As well as the GBMWHA, adjoining BMCC bushland reserves and the urban area, a fourth major concentration of environmental weeds can be found within the substantial central transport corridor (Great Western Highway, Main Western Railway) that traverses the Blue Mountains. Transport NSW is responsible for the management of the corridor's environmental weeds.

Currently, for the greater part of its length the corridor is infested with State, Regional and Local Priority Weeds (Blackberry, Butterfly Bush, Crofton Weed, Pampas Grass, Privet and many more). In the spring of 2024, the corridor glowed with the bright yellow flowers of Scotch/English Broom, a State Priority Weed.

The environmental weeds that infest the Blue Mountains transport corridor are of great concern to the Society, as their management is patently ineffectual. Transport corridors require substantial stormwater management infrastructure. The stormwater infrastructure of the Blue Mountains transport corridor discharges into a large number of natural drain lines, minor streams and major streams, that flow into the GBMWHA. There is considerable potential for the seed of Priority Weeds to be distributed into adjacent bushland and the GBMWHA. As discussed, weed seed is also distributed by animals, particularly birds.

The ineffectual management of corridor weeds is distressing and demoralising to the many Blue Mountains residents who contribute to volunteer Bushcare programs, to the general public, and to local landowners who have been requested to manage weeds by BMCC.

At their April 2024 council meeting, BMCC councillors resolved to write to the Minister for Transport and request that additional funding be allocated to Transport NSW for corridor weed management work. The Society is unaware if BMCC received a reply to its correspondence.

The Society pursued the corridor weed management issue with the NSW Department of Primary Industries (DPI) in May 2024. The DPI replied on 19 May 2024. The following quote is a key section of their reply:

Cape broom is not currently listed in the Greater Sydney Regional Strategic Weed Management Plan.

Scotch broom and Pampas grass are listed as 'Asset Protection' priority weeds in the regional plan. While these weed species are relatively low priority (compared to other listed species), I have copied your local Weed Biosecurity Officers and Local Land Services, Regional Weeds Coordinator into this email trail for their consideration.

Cape Broom, Scotch Broom and Pampas Grass are all serious Blue Mountains environmental weeds that constantly threaten the ecological integrity of BMCC bushland reserves, important ecological communities, and the adjoining GBMWA.

The Society pursued the corridor weed issue directly with Transport NSW, on 12 June 2024. Transport NSW replied on 9 July 2024. The following quote is a key section of their reply:

In 2023, Sydney Trains have treated 74 weed incursions in the Blue Mountains, which have mostly included blackberry and broom. Sydney Trains has an ongoing vegetation management program, which includes the removal and control of weeds where appropriate. The primary focus of this program is to ensure the safety and reliability of the rail network by ensuring vegetation doesn't negatively impact the integrity of our assets and rail operations. As such, vegetation management is prioritised based on the level of risk to Sydney Trains assets, rail operations and general biodiversity.

Thank you...

From an environmental perspective, the Society considered this communication from Transport NSW to be most unimpressive. It would appear that Transport NSW does not prioritise vegetation management according to their responsibilities under the *Biosecurity Act 2015* (NSW), but only in terms of *general biodiversity*. The Society notes that Transport NSW did not address the issue of when their weed corridor management program would resume. The communication of 9 July 2024, along with local observations, strongly suggest that no or extremely minimal weed management works were conducted in the corridor during 2024, even though the corridor was infested with State, Regional and Local Priority Weeds.

Management of environmental weed sales and distribution by commercial entities

As well as the need to manage environmental weeds that are already well established in urban and protected areas of the Blue Mountains, there is a need to implement satisfactory control of environmental weed distribution by commercial entities, such as garden nurseries, retailers at community markets, online retailers, and importers of plant species (legal and illegal).

The *Biosecurity Act 2015* (NSW) and the *Biosecurity Act 2015* (Commonwealth) impose biosecurity duties on commercial entities.

The Society is of the opinion that enforcement of the *Biosecurity Act 2015* (NSW) in the Blue Mountains as applied to commercial entities can be rated as only fair to inadequate. Local nurseries have been known to stock Priority Weeds. BMCC does operate a Bushland Nursery Initiative, that accredits local nurseries that do not sell Priority Weeds. However, the scheme does not cover the full range of environmental weeds listed by BMCC. Quite possibly due to financial constraints, BMCC does not appear to be monitoring plant retailers operating in local markets (primarily weekends).

The Society is aware of interstate online plant retailers who advertise for sale NSW Priority Weeds. Contemporary academic research reveals that online trading of environmental weeds within Australia is rampant ('Weed wide web: characterising illegal online trade of invasive plants in Australia' Maher, J. *et al.* August 2023).

Federal Minister for the Environment and Water, Hon. Tanya Plibersek MP, and her state counterparts have agreed to progress a national threat abatement plan to combat the impact of escaped garden plants on native species. The Society has written to the minister and endorsed this plan.

Overall, state and federal government monitoring and regulation of commercial environmental weed distribution is grossly inadequate.

Discussion

The Society is aware that strictly speaking, the administrative scope of the Independent Biosecurity Commissioner is limited to NSW. However, in this section, the Society will also make recommendations that pertain to federal administration of environmental weeds, in anticipation that relevant NSW ministers will have opportunities to confer with their federal counterparts.

- **Funding of weed management**

Environmental weed management funding appears to be grossly inadequate. The on-ground work is personnel intensive. Management of weeds primarily involves direct employment of trained personnel, or engagement of contractors. As mentioned, BMCC recently corresponded with the NSW Minister for Transport and requested that adequate environmental weed management funding be procured for the department. This strongly indicates that current funding is inadequate. It would appear that Transport NSW undertook absolutely no environmental weed management work along the Blue Mountains Transport Corridor in 2024, quite probably due to funding shortcomings.

Also, funding estimates and allocations are likely to be inadequate. This is because secondary follow-up work of a treated area is almost always required, once primary work has been completed. Environmental weeds develop soil seed banks, where deposited weed seed is stored. Once the primary stand of weeds has been treated, a fresh secondary stand develops, when stored seed is exposed to sunlight and germinates. Quite possibly, funding estimates and allocations make no provision for necessary follow-up work. When follow-up work is not performed before seed set and deposit occurs, then the weed cycle is perpetuated. When this happens, essentially the primary work has been a waste of money and time. As Transport NSW apparently undertook absolutely no environmental weed management work along the Blue Mountains Transport Corridor in 2024, a fresh growth of environmental weed plants would have occurred, and these plants and established plants would have produced copious amounts of seed.

The same principle applies to grant funded work. Grants are often limited to one or two years of funding. Unless adequate follow-up funding is provided, the initial primary work is wasted.

Also, many smaller councils simply do not have the financial resources to adequately manage all of their major environmental weeds and are forced to prioritise a few of the worst species. As the NSW DPI acknowledges, in the meantime, many of the less prioritised species adapt to local conditions and become serious problems.

- **Efficacy of environmental weed management planning**

The Society's recent experiences, as outlined, indicate that preparation of environmental weed management objectives and plans is deficient. Quite possibly, management planning is based on funding considerations and achieving economic benefits, rather than on environmental and ecological considerations. As *Review 2024* states: there is a need to *Include a plan for resourcing intense reduction of pest animals and weeds*

from high conservation value regions and NSW biosecurity activities focus on risks to the economy but [do] not directly address emerging risks to the environment and community amenity.

This inadequate planning by statutory authorities has quite possibly been brought about by executive acceptance that funding is and will continue to be inadequate, and that environmental weed management must be based on anticipated funding and be highly targeted, to a virtually ineffectual degree. That is, most environmental weeds are ignored.

Certainly, the Society's experience with the DPI and Transport NSW indicates that the *Greater Sydney Regional Strategic Weed Management Plan 2023-2027* is seriously deficient. Virtually none of the environmental weeds that afflict the ecosystems of the Blue Mountains and the GBMWHI are seriously targeted in the Plan. As the DPI stated in the correspondence previously quoted, they are *relatively low priority*.

In terms of the environmental degradation that they inflict, so called low priority weeds such as Scotch Broom and Pampas Grass are not low priority in the Blue Mountains. Favourable environmental conditions in the Blue Mountains, such as the climate, dictate that these particular weeds will destroy sensitive ecosystems and sections of the GBMWHI, unless adequately managed.

Regional planning processes should consider all the risks and threats faced by local and regional ecosystems, the local and regional environmental conditions that influence environmental weed spread and growth, and be aware of special local and regional environmental circumstances and priorities, such as the GBMWHI.

In fact, the Society believes that there is a strong case to be made, at least as regards the Greater Sydney Region, for environmental weed management planning to be based on local government areas (LGAs), or amalgamations of LGAs based on environmental and ecological considerations. Environmental weeds do not comprehend administrative boundaries; they conform to ecological conditions.

There is also no detailed mapping of environmental weeds in the *Greater Sydney Regional Strategic Weed Management Plan 2023-2027*. It seems strange that priceless environmental assets, like GBMWHI and the Cumberland Plain Ecological Community, are not actually mapped and discussed in the Plan. As *Review 2024* stated: *analysis showed that although priority species were identified, priority management areas were typically not identified.*

Jurisdiction issues are adversely affecting the efficacy of environmental weed management planning in NSW. These issues are certainly at play in the Blue Mountains. A co-ordinated management approach does not operate in the Blue Mountains. As *Review 2024* states: an environmental weed management plan should *Detail specific commitments for regional coordination and local delivery*. Much of the effective environmental weed management work being undertaken by BMCC, NPWS and 600 Bushcare volunteers is being undermined by the failure of Transport NSW to effectively manage environmental weeds along the transport corridor. Certainly, Transport NSW has administrative jurisdiction along the transport corridor, but Transport NSW is under no obligation to work with BMCC (Local Control Authority) and develop a co-ordinated environmental weed management plan.

- **Enforcement**

The current environmental weed management regime appears to lack any effective means of enforcement. It is quite obvious that Transport NSW has not complied with its obligation under the *Greater Sydney Regional Strategic Weed Management Plan 2023-2027* to manage Priority Weeds such as Scotch Broom, Blackberry and Pampas Grass growing within its Blue Mountains transport corridor. Possibly prosecution under the *Biosecurity Act 2015* (NSW) is an option, but this appears to be a very expensive and complex

option.

- **State and federal liaison**

As discussed, the federal and state ministers responsible for the environment have agreed to progress a national threat abatement plan to combat the impact of escaped garden plants on native species. The Society views this as an important, necessary development.

The Society notes that neither the NSW Department of Primary Industries, nor the federal Department of Agriculture, Fisheries and Forestry makes it clear on their websites as to which entity is responsible for the management and prevention of interstate, online environmental weed transactions and exchanges in Australia.

Recommendations

The Society notes that the administrative scope of the Independent Biosecurity Commissioner is confined to NSW. However, the Society is aware that NSW government ministers do have opportunities to consult with their federal counterparts, and has included here recommendations that require implementation at the federal administrative level.

1. The Society recommends that funding of environmental weed management by the state and Australian governments be dramatically increased, and be based on environmental and ecological considerations i.e. the funding targets ecosystem maintenance and health.
2. Councils that financially struggle to meet their environmental weed management obligations should receive special financial consideration. Means tested funding may be required.
3. The Society recommends that current funding arrangements, including grant systems, be reviewed, to ensure that both primary and all necessary follow-up environmental weed treatments are adequately considered, and funded within an appropriate time space.
4. The Society recommends that in the first instance, planning targets should be determined by environmental and ecological considerations, and not financial and economic considerations. Environmental weeds that pose a significant threat to important local ecosystems should be rated as Priority Weeds that require high level management. If a plan's environmental targets are not met, then funding needs to be increased, until the targets are met.
5. The Society recommends that planning processes adopt a more locally targeted approach, and that current planning regions e.g. Greater Sydney, be sub-divided on a local government area and environmental basis, to maximise environmental weed management outcomes. Certainly, the total inclusion of the Blue Mountains within the Greater Sydney region for the purposes of environmental weed management, with no regard being paid to the unique environmental features of the former, can quite reasonably be considered a bizarre administrative arrangement.
6. The Society recommends that future plans address jurisdictional issues. Every state administrative body working within a particular planning region should be required to actively liaise with the Local Control Authority and prepare a co-ordinated response to environmental weed management.
7. The Society recommends that significant environmental and ecological assets should be mapped and included in environmental weed management plans.

8. The Society recommends that the frequency of assessment of actual and potential environmental weed species and their level of environmental threat should be reviewed. For example, Arum lily (*Zantedeschia aethiopica*) and Crofton Weed (*Ageratina adenophora*) are environmental weeds that appear to be rapidly expanding their range in the Blue Mountains.
9. The Society recommends that a review be held into the funding and conducting of environmental weed research. For example, is research funding adequate and environmentally focused? Should councils receive research funding, at least on a casual basis, to assess spread and management of local environmental weeds?
10. The Society supports co-ordinated federal and state development and implementation of a national threat abatement plan to combat the impact of escaped garden plants on native species.
11. The Society recommends that the NSW Department of Primary Industries and the federal Department of Agriculture, Fisheries and Forestry clarify and publicise management responsibility for the prevention of interstate online environmental weed transactions and exchanges in Australia.

Thank you for taking the time to consider the Society's concerns and recommendations. I may be contacted at my email address below.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'A. Cam', written in a cursive style.

Mrs Annette Cam
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