

Draft Threat Abatement Plan for Ecosystem Degradation, Habitat Loss and Species Decline due to Invasion of Northern Australia by Introduced Grasses

June 2025



The National Farmers' Federation (NFF) is the voice of Australian farmers.

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF represents Australian agriculture on national and foreign policy issues including workplace relations, trade, and natural resource management. Our members complement this work through the delivery of direct 'grass roots' member services as well as state-based policy and commodity-specific interests.

NFF Member Organisations



Table of Contents

| | |
|--|----------|
| About Us | 2 |
| NFF Member Organisations | 2 |
| Introduction | 4 |
| Proposed Objectives and Actions | 5 |
| > Objective 1 | 5 |
| > Objective 2 | 5 |
| > Objective 3 | 6 |
| > Objective 4 | 7 |
| > Objective 5 | 7 |
| > Objective 6 | 7 |
| > Objective 7 | 7 |
| Conclusion..... | 8 |

13 June 2025

Natural Capital Program
Department of Climate Change, Energy, the Environment, and Water
Queensland Government
Australia

Via Email: invasivespecies@dcceew.gov.au

RE: Draft Threat Abatement Plan for Ecosystem Degradation, Habitat Loss and Species Decline due to Invasion of Northern Australia by Introduced Grasses

To the Department of Climate Change, Energy, the Environment, and Water,

Introduction

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to inform the development of the proposed *Draft Threat Abatement Plan for Ecosystem Degradation, Habitat Loss, and Species Decline Due To Invasion of Northern Australia* by the following grass species:

- *Gamba grass*.
- *Para grass*.
- *Hymenachne*.
- *Mission grass*.
- *Annual mission grass*.

These grasses have been formally recognised in National and State policy as 'conflict species' (i.e., species that provide productive value and ecological risk). For example, *gamba grass* and *hymenachne* are declared Weeds of National Significance (WoNS) yet continue to be used in different jurisdictions.

The following table summarises the declared weed status of the five identified grass species across jurisdictions:

| <u>Grass Species Name</u> | <u>WoNS Designation</u> | <u>Northern Territory Status</u> | <u>Queensland Status</u> | <u>Western Australia Status</u> |
|------------------------------------|--------------------------------|---|---------------------------------|--|
| <i>Gamba grass</i> | Declared 2012 | Declared (Eradicate / Control Zoned) | Restricted Invasive Plant | Declared Pest, Prohibited |
| <i>Para grass</i> | N/A | N/A | N/A | N/A |
| <i>Hymenachne</i> | Declared 1999 | Declared, Control | Restricted Invasive Plant | Declared Pest |
| <i>Mission grass</i> | N/A | Declared, Control (<i>Mission grass</i> , <i>perennial</i>) | N/A | N/A |
| <i>Annual mission grass</i> | N/A | N/A | N/A | N/A |

NFF acknowledges the ecological risks and impacts associated with unmanaged infestations of these grass species in Northern Australia. Impacts are well documented and include but are not limited to altered fire regimes, sedimentation, degraded natural habitats, impaired recreational water quality, reduced crop yields, and damage to irrigation infrastructure.

It is critical, however, that this Threat Abatement Plan clearly distinguishes between unmanaged infestations and the strategic regulated use of certain grasses within agricultural production systems. Several species (particularly *para grass*, *gamba grass*, and *hymenachne*) are integral to Northern grazing operations where they are actively managed as fodder resources. These species support ponded pastures, floodplain grazing, and dry-season cattle feed systems, especially in the Top End of the Northern Territory and parts of Queensland. These are established land-uses that contribute significantly to regional economies and national food security, and this must be recognised in the final Threat Abatement Plan.

It is our view that in its current form, the proposed Threat Abatement Plan does not strike this balance. NFF holds serious concerns regarding the design and delivery of several proposed Actions. This is articulated in the proceeding sections below.

Proposed Objectives and Actions

Objective 1: Prioritise Biodiversity and Cultural Assets and Areas for Protection, and Increase Our Understanding of the Ecological Impacts of These Grasses

The NFF supports efforts to increase understanding of invasive grass impacts.

The current framing disproportionately emphasises First Nations priorities without adequately reflecting broader land management responsibilities. This theme is repeated throughout the proposed Threat Abatement Plan. Governance proposals that centre exclusively on Indigenous-only delivery networks risk excluding and ostracising broader landholder and community participation. Biosecurity requires a shared, multi-stakeholder approach. To be effective, it must support coordinated, inclusive partnerships that reflect all land tenures and sectors involved in landscape management.

Additionally, Actions 1.5, 1.6, and 1.7 are research-heavy and risk diverting resources away from on-ground management. Given finite funding, on-ground management and extension activities should be prioritised.

Objective 2: Effectively Manage Existing Invasive Grass Infestations

The NFF supports the emphasis on practical measures to manage existing invasive grass infestations, including improved coordination, training programs, extension support, and the dissemination of best practice guidance. However, implementation will only succeed if it is based in genuine regional engagement rather than passive outreach methods such as brochures.

Additionally, under Action 2.11, it is stated that “...*these grasses cannot be effectively contained within a managed grazing system*”. Landholders are capable and active managers of the landscape. The grass species identified under this Threat Abatement Plan are already being actively managed in production systems across Northern Australia. For example, *gamba grass* requires careful height control to maintain palatability and minimise environmental risk. As outlined in *the National Best Practice Management Manual for Gamba Grass*, rotational grazing with high stocking rates is recommended to keep *gamba grass* below 60-90 cm in height. Maintaining this threshold limits seed production and spread, preserves grazing value, and significantly reduces fuel loads and fire hazards during dry seasons.

This example demonstrates that containment is not only possible, but achievable with the right management regimes in place. The risks posed by these grasses are not intrinsic to their presence in production systems, they depend on whether landholders are supported to implement evidence-based practices. Blanket assertions that deny the feasibility of containment in production systems overlook this reality and risk undermining the very partnerships that Action 2.7 aims to foster. If landholders are to be meaningfully engaged in coordinated cross-tenure management programs, their ability to manage these species responsibly must be acknowledged and not dismissed.

Furthermore, this broader point underscores our opposition to the proposed withdrawal of extension material that promote the agricultural use of ‘conflict species’, as further discussed under Objective 6. Effective on-ground management is contingent on access to technical guidance materials, training, and regionally tailored extension support. Deliberately removing or undermining this capacity will weaken landholder engagement and erode trust, compromising the successful implementation and achievement of the proposed Objectives of this Threat Abatement Plan (noting the latter is reviewed at least once every five-years). Rather than implying containment is unachievable, this document must acknowledge the active and ongoing management efforts undertaken by landholders and prioritise strengthening extension services to empower and support best-practice management.

Objective 3: Improve Coordination of Invasive Grass Management

National coordination is welcome, provided it integrates existing frameworks such as the *National Established Weeds Priority Framework* and WoNS. NFF support the development of regional invasive grass management strategies tailored to areas with existing infestations (Action 3.3) as these allow for more effective, locally adapted responses.

On the other hand, Action 3.2 as currently drafted embeds an exclusive Indigenous governance model, which risks sidelining other key landholders, including pastoralists and non-Indigenous land managers. While the role of Indigenous Ranger groups is important and cannot be discounted, inclusive co-design must be the default to ensure full landholder participation and uphold shared stewardship responsibilities.

Objective 4: Prevent Further Human-Assisted Spread of Invasive Grasses

This Objective requires refinement to reflect a more balanced and pragmatic approach, acknowledging that some listed grasses have legitimate authorised uses in agricultural systems. A more appropriate Objective statement would:

- *Prevent further human-assisted spread of invasive grasses while recognising the productive use of 'conflict species' in regulated agricultural systems.*

Actions 4.3 and 4.4 imply a potential phase-out or restriction on the use of productive agricultural grasses including *para grass*, *gamba grass*, and *hymenachne* for fodder production, cultivation, and transportation without a clear scientific or economic basis. These proposals are unjustified, conflict with existing land-use authorisations, and pose serious risks to grazing enterprises. **NFF strongly opposes their inclusion and recommends they be removed entirely from the final Threat Abatement Plan.**

Objective 5: Map, Monitor, and Report Invasive Grasses

NFF is concerned about proposals that encourage compulsory monitoring and reporting obligations of all invasive grass management activities (Action 5.5). Although well intended, such requirements must account for the realities of pastoral operations where these grass species often form part of managed grazing systems. If implemented, monitoring obligations should be proportionate, voluntary, and aligned with existing jurisdictional requirements and frameworks to avoid regulatory overreach and compliance fatigue.

Objective 6: Increase Awareness About Invasive Grass Impacts and Best Practice Management

NFF opposes the proposed withdrawal of all extension materials that support the regulated agricultural use of 'conflict species' (Action 6.5). This measure undermines lawful, best practice land-use in Northern Australia. A more constructive approach would be to update and regionalise extension materials to reflect current legislative requirements, permissions, and best practice management actions.

Objective 7: Improve Invasive Grass Management Through the Development of New Tools and Understanding Interactions That Facilitate Invasion

NFF supports the intent of Objective 7, which is well-conceived and forward-looking in its focus on innovation. We particularly welcome the emphasis on emerging technologies, such as Artificial Intelligence (AI) as it offers significant potential to improve detection, risk assessment, and control of invasive grasses. This forward-planning is prudent as Threat Abatement Plans under the *Environment Protection and Biodiversity Conservation Act 1999* are subject to review at least once every five-years by the Australian Government Environment Minister.

We note the following:

- Actions 7.4, 7.5, and 7.7 including the development of AI tools, remote sensing technologies, and most importantly integrated weed management frameworks, should be treated as high priority initiatives given their potential for scalable application and long-term efficiency across jurisdictions.
- Action 7.2 must be grounded in realistic, regionally appropriate climate scenarios, to ensure modelling outputs remain credible, practical, and aligned with on-ground decision-making.
- Action 7.6 which explores future biocontrol options, must be pursued with rigorous scientific caution, drawing on lessons from past biological control failures (i.e., the cane toad) to avoid unintended ecological consequences for biodiversity and well-managed production systems.

Conclusion

NFF does not support the proposed Draft Threat Abatement Plan in its current form. This document has raised significant concerns from NFF members and producers across Northern Australia where many of the listed grass species are actively managed within regulated grazing systems. Unless this Plan is refined to address the issues outlined in this submission, we cannot support its adoption.

The success of this Threat Abatement Plan will ultimately depend on its ability to clearly distinguish between unmanaged infestations and the strategic, regulated use of certain grass species within agricultural production systems. Equally important is the need to avoid exclusionary governance models, ensure alignment with existing jurisdictional frameworks, and engage all stakeholders through a practical, inclusive, and proportionate implementation approach.

To be effective, this document must:

- **Respect State and Territory determinations.**
- **Recognise and safeguard the authorised productive use of these species.**
- **Retain or adapt extension materials** that support the lawful and best practice management of ‘conflict species’ in agricultural production systems.
- **Avoid overreach in compliance measures** (i.e., the introduction of compulsory monitoring and reporting obligations for landholders).

NFF remains committed to working constructively with the Department to refine this document in a manner that delivers robust biosecurity outcomes while supporting productive agricultural systems. We encourage meaningful engagement and strongly urge the Department to incorporate the practical knowledge and lived experience of producers and land managers across Northern Australia.

Please do not hesitate to contact Warwick Ragg, General Manager, Natural Resource Management, via e-mail: WRagg@nff.org.au at the first instance to progress this discussion.

Yours sincerely,



TROY WILLIAMS

Chief Executive Officer



National
Farmers
Federation

Leading
Australian
Agriculture

NFF House
14-16 Brisbane Avenue
Barton ACT 2600

Locked Bag 9
Kingston ACT 2604

(02) 6269 5666
reception@nff.org.au
nff.org.au



National Farmers Federation



@NationalFarmers