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13 October 2003

The Secretary
Environment, Communications, Information Technology and the Arts References Committee
The Senate
Parliament House
Canberra ACT 2600
AUSTRALIA

Dear Sir,

Re: Submission to the Senate Environment, Communications, Information Technology and Arts Reference Committee inquiry into “the regulation, control and management of invasive species and the Environment Protection and Biodiversity Conservation Amendment (Invasive Species) Bill 2002”.

Please find attached a submission to the Invasive species inquiry. This submission was authorised at the WSQ Inc. executive meeting of the 10th October 2003.

Yours Sincerely,

Martin Hannan-Jones
Weed Society of Queensland

Encl (1)

Weed Society of Queensland Inc

Submission to the

Inquiry into the regulation, control and management of invasive species and the Environment Protection and Biodiversity Conservation Amendment (Invasive Species) Bill 2002.

October 2003

Summary

The WSQ Inc wishes to state that invasive plant impacts in Queensland include: the loss of biodiversity; severe negative affects on human health; the loss of production/yield in agriculture; the degradation natural resources; the production of toxins that effect humans and animals; the destruction of natural aesthetic values; impairment of social amenity; and increased operating costs to a range of industries.

The WSQ Inc stresses the importance of prevention or alternatively early detection, containment and eradication of new weed incursions into Australia and the high economic benefit of such strategies over containment, damage mitigation and inaction.

The WSQ Inc wishes to highlight the failure of some State and Territory governments in not aligning their weed legislation to support of the Weeds Of National Significance (WONS) and the National strategies developed for these weeds.

The WSQ Inc condemns the inadequacy of the short-term nature of previous Commonwealth funding models for community based weed control work and research into control methods for invasive plants.

The WSQ Inc. is intrigued by necessity to amend the act when there are unused provisions in the *Environment Protection and Biodiversity Conservation Act 1999*. Part 13, Division 6A, Section (301 A) that allow for the creation of "Regulations for control of non-native species". To the best of WSQ knowledge it appears that regulations under this section have never been created. With the development of clear, directed regulations Section 301 would deliver effective national outcomes without the need to amend the present Act.

Introduction

The Weeds Society of Queensland Inc. membership are concerned with the management of weeds in Queensland. The WSQ Inc aims are:

- To promote wider interest in weeds and their control.
- To provide opportunities for those interested in weeds and their control to exchange information and ideas based on research and practice.
- To encourage the investigation of all aspects of weeds and weed control.
- To encourage the study of weed science and the dissemination of its findings.
- To encourage education in weed science and weed control.
- To produce and publish such material as may be considered desirable.
- To cooperate and, where appropriate, affiliate with other organisations engaged in related activities.
- To foster the development of an Australia-wide weeds organisation.

The Weeds Society of Queensland Inc. is a member of the Council of Australian Weed Science Societies.

The Weeds Society of Queensland Inc. welcomes the opportunity to submit the following points for consideration by the Senate Environment, Communications, Information Technology and Arts Reference Committee inquiry into “the regulation, control and management of invasive species and the Environment Protection and Biodiversity Conservation Amendment (Invasive Species) Bill 2002”.

WSQ Inc Responses to the Inquiry Terms of Reference

(a) The nature and extent of the threat that invasive species pose to the Australian environment and economy;

Response: The WSQ Inc wishes to state that invasive plant impacts in Queensland include: the loss of biodiversity; severe negative affects on human health; the loss of production/yield in agriculture; the degradation natural resources; the production of toxins that effect humans and animals; the destruction of natural aesthetic values; impairment of social amenity; and increased operating costs to a range of industries.

Since European settlement, 1153 introduced plant species have become naturalised in Queensland (Henderson 1999). Of these plants, a third are estimated to have been introduced as garden ornamentals with a further sixth deliberately imported for food, fodder or for revegetation. Only one sixth are suggested to have been accidental introductions, such as soil or grain contaminants. Fourteen of the 20 Weeds of National Significance occur in Queensland. The rate of new plants naturalisation in Queensland was estimated in a recent report from the Queensland Herbarium at least double the generally accepted rate of 4-6 per year.

Invasive weeds cost Queensland many hundreds of millions per annum with \$500 million being often quoted in the media. The economic cost of all invasive weeds to Australia has only ever been estimated by economic models. However, individual studies have been

conducted to determine the economic cost of some of the more important weeds. The economic cost in \$A per annum of six of the Weeds of National Significance (WONS) of importance to Queensland have been estimated: lantana (\$7.7M, Culvenor 1985), parthenium (\$18.3M, Chippendale and Panetta 1994), rubber vine (\$8M, Chippendale 1991), prickly acacia (\$4.2M – \$9.4M, PASP 2000), mesquite (\$1M, van Klinken and Campbell 2001) and parkinsonia (). Just these six invasive plant species cost Queensland \$50 million each year in lost production and control costs.

Examples of the types of impacts of invasive plants in Queensland include:

- Loss of natural values/biodiversity (rubber vine is destroying unique vine thicket ecosystems in the gulf river systems of north Queensland (Tomley 1998))
- Human health (parthenium and annual ragweed have known allergens eliciting severe skin reactions and asthma in persons that are exposed to the plants (Navie *et al* 1998))
- Loss of production/yield (numerous weeds compete with crops and pasture for moisture and nutrients leading to lower yields)
- Natural resource degradation (woody weeds such as prickly acacia are known to change the function and structure of the landscape leading to further problems such as soil erosion (PASP 2000))
- Toxin production (lantana and mother of millions are both toxic to cattle (Swarbrick et al (1995), Hannan-Jones and Playford (2002))
- Aesthetic values (Madeira vine, cats claw creeper and balloon vine are smothering the edges of rainforest remnants ruining natural vistas in highly visited conservation areas)
- Social amenity (water weeds such as salvinia, water lettuce, water hyacinth and cabomba reduce the amenity of waterways and water storages for social and recreational activities Room and Julien (1995), and Wright and Purcell (1995))
- Increased operating costs (weeds such as prickly acacia hinder mustering and lantana hinders plantation forestry practices Mackey (1998) and Swarbrick et al (1995))

(b) The estimated cost of different responses to the environmental issues associated with invasive species, including early eradication, containment, damage mitigation and inaction, with particular focus on: (ii) The following weeds: (A) mimosa (*Mimosa pigra*), (B) serrated tussock (*Nassella trichotoma*), (C) willow (*Salix spp.*), (D) lantana (*Lantana camara*), (E) blackberry (*Rubus fruticosus agg.*), and (F) parkinsonia (*Parkinsonia aculeata*);

Response: The WSQ Inc wishes to stress to the Inquiry the importance of prevention or alternatively early detection, containment and eradication of new weed incursions into Australia and the high economic benefit of such strategies over containment, damage mitigation and inaction.

An assessment of the economic impact of State and Local government expenditure on weeds and pest animal management in Queensland was carried out in 2002 (AEC 2002). This assessment showed that every dollar spent on pest management initiatives in Queensland,

could deliver up to \$6.40 in benefit, implying a net return of up to 540%. The public benefit was shown to outweigh private benefit and therefore any increase in the level of expenditure will increase the net benefit to the public. The public receives up to \$3.70 in benefits for every dollar invested, but this return differs from species to species and on the level of management. Some activities provide a greater return than others; education and awareness activities return a Benefit Cost Ratio (BCR) of 43.8 while control of established species returns a BCR of 2.3:1 at a 6% discount rate.

Prevention

The border prevention barrier provided by the Australian Quarantine Inspection Service is to be lauded. The AQIS process of risk assessment of plant imports seems to provide a mechanism to prevent the future introduction of potential weeds into Australia but this still should be complimented by strict adherence to a precautionary principle.

The Net Present Value (NPV) of State and Commonwealth prevention programs in Queensland has been estimated at between \$53 and \$131 million, with a BCR of 25:1 - 38:1. The results of this analysis indicate that it is economically desirable to continue to prevent the entry of new pests.

Early detection

The efforts of the small staff of the Northern Australian Quarantine Strategy have served Australia well with many potentially destructive pests being found before they have had time to irrevocably establish in Australia. But to be truly effective the identification efforts of highly skilled botanists and zoologists in herbaria and museums must be complemented by ongoing systematic surveys of all of Australia. The huge size of such an undertaking must encourage in fact demands a heightened level of community awareness and participation.

The effort of the last few years by various State and Commonwealth agencies for the development of a national reporting system of new incursions is also to be commended; but such systems must be readily accessible to the general public both for the reporting of suspicious plants and animals but also in providing education and awareness for land owners that may have information on further outbreaks for these pests. An example of the need for continued dissemination of information about weed incursions to the general public was illustrated recently with Siam weed in Queensland. Siam weed was first identified along the Tully River and near Mission Beach in Far North Queensland in 1994 and has since then been the focus of an intensive identification and eradication program jointly funded by a national agreement. However, in 2003 nine years after the education/awareness began in the area, a further TV campaign and surveys found infestations of Siam weed outside of the initial target region.

Eradication

An economic evaluation of the one Queensland eradication effort, directed at Siam weed in far north Queensland resulted in a NPV of \$12.8 - \$44.1 million, and BCR of \$9.90 - \$26.80 return for every dollar invested (Adamson *et al.* 2000). Siam weed is found in a region of high conservation significance, which significantly increases the potential impacts of this species. This study identified the environmental, e.g. impacts on endangered and rare species, and non-production returns, e.g. recreational use values, as well as the production returns. The non-production BCR in this study was 5.4:1, which although lower than the production return showed that the net benefit from the eradication activity was greater than just those from savings on production losses alone.

Containment

An issue of concern to the WSQ Inc is the lack of any coordinated National containment policy once eradication is determined to be not possible.

(c) The adequacy and effectiveness of the current Commonwealth, state and territory statutory and administrative arrangements for the regulation and control of invasive species;

Response: The WSQ Inc wishes to highlight the failure of the State and Territories in aligning their weed legislation to support of the Weeds Of National Significance (WONS) and the National Strategies developed for these weeds.

The National Weeds Strategy (1997) states:

“Goal 1: To prevent the development of new weed problems

Objective 3: To reduce weed spread to new areas within Australia

- Provide guidelines to States and Territories to ensure appropriate consistency in weeds legislation.
- Facilitate adoption of the guidelines.”

The WSQ has been appalled by the uneven support that various state governments have given to this aspect of the National Weeds Strategy process.

The NWS lists 10 principles that States and Territories ought to adopt in the development of noxious weeds legislation. These principles have not had universal adoption by the State and Territories. “The slow progress of gaining NWSEC and AWC endorsement of the discussion paper highlights the difficulty in gaining agreement across jurisdictions when it requires a change in approach to an issue away from their existing framework” (NSWEC 2002).

To date only three of the 20 WONS have actually been declared in all States see Table 1. Even when a WONS has received a declaration status in some Australian States and Territories this does not preclude its sale and transportation to other States. For example, *Lantana camara* is still available for sale in NT towns including a big wholesale nursery in Darwin, in the ACT, WA, NSW and Victoria. *Lantana camara* sale is now banned from sale in Queensland, Tasmania and South Australia.

Table 1. Declaration status of the 20 WONS in Australian States (from Noxious Weed List for Australian States prepared by the National Weeds strategy Executive Committee 31/05/2002 updated by WSQ in include changes to Queensland Legislation, 31/08/2003). **Red cells** indicate Australian States that do not have supporting weed declaration to prevent for example the sale and trade of WONS. See Appendix B for key to symbols.

	Weed		Category							
	Preferred Scientific Name	Preferred Common Name	Vic	NSW	SA	WA	Tas	Qld	NT	ACT
1	<i>Acacia nilotica</i>	Prickley acacia		W1p	11+	P1/2	D	I	A/C	
2	<i>Alternanthera philoxeroides</i>	alligator weed	S	W1/2/3	1N#	P1/2	D	I	A/C	D
3	<i>Annona glabra</i>	pond apple			11+	Prohib	D	II		
4	<i>Asparagus asparagoides</i>	bridal creeper		W3/4c p	2@	Prohib	D	I		
5	<i>Cabomba spp.</i>	cabomba		W4g		Unass		II	A/C	
6	<i>Chrysanthemoides monilifera ssp. monilifera, Chrysanthemoides monilifera ssp. rotundata</i>	boneseed, bitou bush	P4 C6	W1/2/3 p	4@	P5	D(a)	I		
7	<i>Cryptostegia grandiflora</i>	rubber vine			11+	P1/2	D	II	C	
8	<i>Hymenachne amplexicaulis</i>	olive hymenachne			11+	Prohib	D	II		
9	<i>Lantana camara</i>	lantana		W2/3 p	11+	Prohib	D	III	B^/C	
10	<i>Mimosa pigra</i>	giant sensitive tree			11+	P1^	D	I	A^/B^/C	
11	<i>Nassella neesiana</i>	Chilean needlegrass		W2/3 p	2N@	Prohib	D	I		D
12	<i>Nassella trichotoma</i>	serrated tussock	P6 C4	W2/3 p	1N#	Prohib	D	I		D
13	<i>Parkinsonia aculeata</i>	Parkinsonia		W1 p	1N#	P1^/2^/4^	D	II	B/C	
14	<i>Parthenium hysterophorus</i>	parthenium weed	S	W1	1N#	P1^	D	II	A/C	D
15	<i>Prosopis spp.</i>	mesquites	S	W1 p	1N#	P1/2^/4^	D	I/II	C	
16	<i>Rubus fruticosus sp. agg.</i>	blackberry	C10	W2/3 m	3*	P1^/2^/4^	D	III		D
17	<i>Salix spp.</i>	willows		W4g S	11+(g)	Prohib	D(c)	I		D(a)
18	<i>Salvinia molesta</i>	salvinia	S	W1/2	1N#	P1/2	D	I	A/B/C	D
19	<i>Tamarix aphylla</i>	athel tree			11+	Prohib	D	III	B^/C	
20	<i>Ulex europaeus</i>	gorse	P2 C8	W2 p	2@	P1/2^/3^	D	I		D

(d) The effectiveness of Commonwealth-funded measures to control invasive species;

Response: The WSQ Inc condemns the inadequacy and ineffectiveness of the short-term nature of previous Commonwealth funding models for community based weed control work and research into control methods for invasive plants.

Lack of support for WONS Strategic Plans

One glaring example is pond apple, where the national strategic plan, dated 2001 i.e. already 2 years old, calls for eradication, but virtually no on-ground work of any kind is being conducted or funded. As a result, even containment is not being achieved which makes a mockery of having a national strategic plan.

Lack of strategic consideration when offering funding

There have been cases where community groups have received funding to conduct on ground eradication works in the core areas of a weed infestation but no control work is funded or conducted in neighbouring areas where the weed is just starting to invade. So that the process of invasion is not prevented and the funding in the core area wasted.

Lack of follow-up funding

The short-term Commonwealth funding cycles do not reflect the biological and ecological processes of invasive plants. It is not unusual for some invasive plants to have seed-banks that persist in the soil for up to 20 years. This requires that eradication measures be repeated at intervals over decades to prevent the seed bank from being replenished until the infestation is finally destroyed.

Need for flexibility of funding arrangements

Funding for eradication and containment of invasive plants needs to be able to be rolled over to following financial cycles in response to climatic conditions that interfere with effective control measures. Climatic conditions such as drought reduce the effectiveness of herbicide control programs and mean that plant seed banks are not germinating for the weeds to be found and controlled by any method.

(e) Whether the Environment Protection and Biodiversity Conservation Amendment (Invasive Species) Bill 2002 could assist in improving the current statutory and administrative arrangements for the regulation, control and management of invasive species.

Response: The WSQ Inc. is intrigued by necessity to amend the act when there are unused provisions in the *Environment Protection and Biodiversity Conservation Act 1999*. Part 13, Division 6A, Section (301 A) that allow for the creation of “Regulations for control of non-native species”. To the best of WSQ knowledge it appears that regulations under this section have never been created. With the development of clear, directed regulations Section 301 would deliver effective national outcomes without the need to amend the present Act.

Section 301 of *Environment Protection and Biodiversity Conservation Act 1999* states that these regulations may:

- (a) provide for the establishment and maintenance of a list of species, other than native species, whose members:
 - (i) do or may threaten biodiversity in the Australian jurisdiction; or
 - (ii) would be likely to threaten biodiversity in the Australian jurisdiction if they were brought into the Australian jurisdiction; and
- (b) regulate or prohibit the bringing into the Australian jurisdiction of members of a species included in the list mentioned in paragraph (a); and
- (c) regulate or prohibit trade in members of a species included in the list mentioned in paragraph (a):
 - (i) between Australia and another country; or
 - (ii) between 2 States; or
 - (iii) between 2 Territories; or
 - (iv) between a State and a Territory; or
 - (v) by a constitutional corporation; and
- (d) regulate and prohibit actions:
 - (i) involving or affecting members of a species included in the list mentioned in paragraph (a); and
 - (ii) whose regulation or prohibition is appropriate and adapted to give effect to Australia's obligations under an agreement with one or more other countries; and
- (e) provide for the making and implementation of plans to reduce, eliminate or prevent the impacts of members of species included in the list mentioned in paragraph (a) on biodiversity in the Australian jurisdiction.

If appropriate regulations were prepared and implemented this section of the existing *Environment Protection and Biodiversity Conservation Act 1999* would allow:

- The national listing of weed species to be prevented entry due to pest potential;
- The national listing of weed species such as the 20 Weeds of National Significance to assist with the intention of nationally important weed management plans and strategies such as banning the sale and distribution between the States and Territories;
- The regulation of invasive species where state legislation does not exist; and
- Assist in the incursion management planning and responses for listed species.

The WSQ Inc thanks the Senate Environment, Communications, Information Technology and Arts Reference Committee for this opportunity to participate in the Inquiry into “the regulation, control and management of invasive species and the Environment Protection and Biodiversity Conservation Amendment (Invasive Species) Bill 2002”.

Signed

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Appendix A. Terms of reference

(1) The regulation, control and management of invasive species, being non-native flora and fauna that may threaten biodiversity, with particular reference to:

(a) The nature and extent of the threat that invasive species pose to the Australian environment and economy;

(b) The estimated cost of different responses to the environmental issues associated with invasive species, including early eradication, containment, damage mitigation and inaction, with particular focus on:

(i) The following pests:

- (A) European fox (*Vulpes vulpes*),
- (B) yellow crazy ant (*Anoplolepis gracilipes*),
- (C) fire ant (*Solenopsis invicta*),
- (D) cane toad (*Bufo marinus*), and
- (E) feral cat (*Felis catus*) and pig (*Sus scrofa*), and

(ii) The following weeds:

- (A) mimosa (*Mimosa pigra*),
- (B) serrated tussock (*Nassella trichotoma*),
- (C) willow (*Salix* spp.),
- (D) lantana (*Lantana camara*),
- (E) blackberry (*Rubus fruticosus* agg.), and
- (F) parkinsonia (*Parkinsonia aculeata*);

(c) The adequacy and effectiveness of the current Commonwealth, state and territory statutory and administrative arrangements for the regulation and control of invasive species;

(d) The effectiveness of Commonwealth-funded measures to control invasive species; and

(e) Whether the Environment Protection and Biodiversity Conservation Amendment (Invasive Species) Bill 2002 could assist in improving the current statutory and administrative arrangements for the regulation, control and management of invasive species.

Appendix B. Key to Table 1 symbols

Queensland

- I** Class 1 pests cannot be sold or traded in the state. Deliberate importation or sale would be subject to a \$60,000 fine. All landowners must take reasonable steps to keep their land free of this species.
- II** Class 2 pests cannot be sold or traded in the state. Deliberate importation or sale would be subject to a \$30,000 fine. All landowners must take reasonable steps to keep their land free of this species.
- III** Class 3 pests cannot be sold or traded in the state. Deliberate importation or sale would be subject to a \$15,000 fine. Landowners may be required to manage the species if it is in or adjacent to an environmentally sensitive area.

Victoria

- S** State Prohibited Weeds. Do not occur in Victoria or it is reasonable to expect that they can be eradicated from the state.
- P** Regionally Prohibited Weeds. Are not widely distributed throughout the region, are capable of spreading further and it is reasonable to expect that they can be eradicated from the region.
- C** Regionally Controlled Weeds. Occur in the region, are capable of spreading further and continuing control measures are required to prevent their spread.

Regional Declaration

Numbers following categories refer to the number of regions in which the weed is declared (total of eleven regions as under the noxious weeds listing, the Port Phillip region is split into an east and west region giving a total of eleven.).

New South Wales

- W1** Notifiable weed. The presence of the weed on land must be notified to the Local Control Authority within three days of detection and the weed must be fully and continuously suppressed and destroyed. It is an offence to sell, move or cause to be moved any W1 weed material, or any animal or thing, which has W1 weed material in or on it in the Local Control Area.
- W2** The weed must be fully and continuously suppressed and destroyed on land that is the responsibility of all private landowners and managers, Local Control Authorities and public authorities.
- W3** The weed must be prevented from spreading and its numbers and distribution reduced.
- W4** The action specified in the declaration must be taken in respect of the weed.
 - (a) The weed must not be sold, propagated or knowingly distributed and any part of the weed must be prevented from growing within 3 metres of the boundary of a property.
 - (b) The weed must not be sold, propagated or knowingly distributed and any existing weed must be prevented from flowering and fruiting.
 - (c) The weed must not be sold, propagated or knowingly distributed and the weed must be prevented from spreading to an adjoining property.
 - (d) The weed must not be sold, propagated or knowingly distributed and the weed must be fully and continuously suppressed and destroyed if it is: 3 metres in height or less, or within half a kilometre of remnant urban bushland, as defined by SEPP 19, and is not deemed by council as having historical or heritage significance or is over 3 metres in height and not included in a Management Plan approved by the local control authority.
 - (e) The weed must be fully and continuously suppressed and destroyed. All reasonable precautions must be taken to ensure produce, soil, livestock, equipment and vehicles are free of the weed before sale or movement from an infested area of the property.
 - (f) The weed must not be sold, propagated or knowingly distributed. Any biological control or other control program directed by a Local Control Authority must be implemented.
 - (g) The weed must not be sold, propagated or knowingly distributed.

Notes

- S** All *salix* spp. other than *S. babylonica*, *S. X calodrendron*, *S. X reichardtii*. *S. nigra* is also a W2 weed in the Maclean Local Control Area.

Regional Declarations Weeds are declared on a Local Control Authority (LCA) basis and declarations for the same noxious weed can vary across the State. There are 138 LCAs. The NSW Agriculture noxious weeds database lists weeds by council area plus the Western Lands LCA and the Lord Howe Island LCA. There are 187 local council areas plus the two other LCAs.

- M** Applies to a majority of local council areas of the State.
- P** Applies to a minority of local council areas of the State.

South Australia

Weed Categories and Regional Declarations

- # Plant must be destroyed throughout the State.
- ^ Plant must be destroyed in part of the State only
- @ Control required throughout the State.
- * Control required in part of the State only.
- + Control not required.
- N Notifiable throughout the State.
- N Notifiable in part of the State only.

Notes

- (a) Not including the variety *trichophylla*
- (b) Not planted carrots
- (c) Not including the cultivar *Consol*
- (d) Not including cultivated trees
- (e) Not including spineless *Optunia ficus-indica* (Indian fig)
- (f) Not including *Orobanche australiana* (*Orobanche cernua* var *australiana* - Australian broomrape)
- (g) Not including *Salix babylonica*, *S. X calodendron*, *S. X reichardii*

Western Australia

Prohib Plant species on the Permitted and Prohibited list not permitted entry into WA under the *Plant Diseases Act 1974*.

Unass Plant species declared in other States and Territories that are not on the Permitted and Prohibited list, are unassessed and are prohibited until assessed via a weed risk assessment.

Noxious weed species listed in the *Agriculture and Related Resources Protection Act* only:

- P1** PREVENTION of trade, sale or movement
- P2** ERADICATE - Serious weeds which are not yet widely established in WA.
- P3** CONTROL - Serious weeds which cannot be eradicated in the short term, but must be kept under control.
- P4** CONTAIN - Well-established plants where reducing the infestation is either impractical or uneconomical.
- P5** Weeds to be CONTROLLED on public land or land under the control of a local government.

Notes

- a. Not including *Orobanche cernua* var *australiana* (Australian broomrape) and *O. minor* (clover broomrape).

Regional Declarations

- ^ Not prescribed for whole of the State.

Tasmania

D Declared plants. Restrictions or measures for each declared weed will be specified in the weed management plan.

Notes

- (a) *Chrysanthemoides monilifera* including subspecies
- (b) Not including *Orobanche minor* and *Orobanche australiana* (*Orobanche cernua* var *australiana* - Australian broomrape)
- (c) Not including *Salix babylonica*, *S. X calodendron*, *S. X reichardii*
- (d) All non-indigenous species of *Striga*

Northern Territory

- A** Class A Noxious Weeds - to be eradicated.
- B** Class B Noxious Weeds - growth and spread to be controlled.
- C** Class C Noxious Weeds - not to be introduced to the Territory. All Class A and B weeds are also considered to be Class C weeds.

Regional Declaration

- ^ Not prescribed for all of the Territory.

Australian Capital Territory

D Declared pest plant.

Notes

- (a) All *Salix* spp. except for the permitted species, *Salix babylonica*, *S. X calodendron*, *S. X reichardii*

Appendix B. References

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