

# Submission to the Northern Territory Government on the *Draft Buffel Grass Weed Management Plan*, from Plant Conservation Australia

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Plant Conservation Australia welcomes the opportunity to provide a submission on the Northern Territory Government's *Draft Buffel Grass Weed Management Plan 2026-2036* (DBGWMP).

## **About Plant Conservation Australia.**

*Plant Conservation Australia* (PCA) was founded in 1991, and was until recently known as the *Australian Network for Plant Conservation* (ANPC). Our mission is to promote and develop native plant and ecosystem conservation practice in Australia.

Plant Conservation Australia is an association of people and organisations dedicated to the conservation of Australia's native plant species and vegetation communities, which are part of our living national heritage and underpin the health and productivity of our continent. We are a national not-for-profit, non-government organization incorporated in the ACT, and are on the Commonwealth Register of Environmental Organisations, with Deductible Gift Recipient and Charity Concessions status with the Australian Taxation Office.

PCA has 34 years of experience in the development of national technical guidelines for native plant conservation, and in the delivery of targeted training and knowledge exchange, through effectively involving experts and stakeholders across jurisdictional, disciplinary, and organisational silos.

## **About Buffel Grass and its ecological and socio-cultural effects:**

Buffel Grass is one of the most significant invasive weed species in northern Australia, and the most detrimental to biodiversity and ecosystem health in the semi-arid and arid lands of central Australia. Its wide establishment and continued spread in inland Australia reflects a failure to develop a strong cross-jurisdictional and cross-tenure management response, despite abundant evidence of severe environmental and cultural impacts spanning many years. This has not been a Northern Territory responsibility alone.

We take it that the biodiversity and fire threats of Buffel Grass are 'agreed facts' in the current process, due to its recent listing as a Declared weed in the Northern Territory. Buffel Grass competes with native vegetation, eliminates habitat and resources for many native plants and animals, and changes ecosystem composition and dynamics both directly and through its secondary effects (especially as a wildfire vector, but also through water and soil nutrient sequestration). Buffel grass promotes hotter, bigger and more frequent fires and the effects of this are profound – and, as time passes, increasingly difficult to remediate. Among other effects are an increased rate of destruction of key life-stage sites for some animal species (e.g. hollow-dependent species) and loss of fire-sensitive vegetation communities.

We take it also that at least some of the negative cultural impacts are also ‘agreed facts’, especially in relation to impacts on Indigenous culture. We are aware of the consistent efforts over many years of Aboriginal Land Councils and Indigenous advocates to draw attention to the Buffel Grass threat, and their calls for a more vigorous management response – e.g. the *Umuwa Statement on Buffel Grass* adopted at the 2022 Indigenous Desert Alliance Conference. These are perspectives we support. Indigenous lands (including but not limited to IPAs) are increasingly important for the preservation of functional Australian ecosystems and landscapes as other areas are progressively degraded, and the efforts of Indigenous owners and managers working from a very limited resource base are compromised by new and expanding exotic threats.

We are concerned whether the *full range* of cultural and social impacts have been adequately considered in the development of the overall NT response to Buffel Grass and the formulation of the DBGWMP. In none of the documentation that we have seen has there been substantive consideration of the broader sociocultural implications of the continued spread and entrenchment of Buffel Grass, including impacts on the very high values placed on natural NT landscapes and native biota by non-Indigenous Australians; the likelihood of tourists being deterred by an increasingly overgrown and fire-prone (or fire-scarred) landscape experience; displacement and undermining of the work (and social roles) of the increasingly important Indigenous Ranger programs; increased difficulty for small-mammal re-introduction efforts (a field of considerable investment and high-value publicity and tourist draw for the NT); and the threat to a range of pre- and post-European sites and landscapes of historical significance.

On top of these impacts, the threat to human lives and property from the massive increase in fire-prone biomass that Buffel Grass represents should drive a more integrated *all-tenure* approach. Permitted pastoral tenure exemptions that would allow not only continued promotion of Buffel Grass use but active importation and seeding, will create a fragmented management regime across the landscape, leading to a disproportionate onus for active management on some tenures (especially conservation and Indigenous), most of which are the least-equipped financially to deal with them in the face of other priorities. This approach will cripple effective cross-tenure management; the edge-effects alone would present impossible problems in preventing cross-boundary establishment.

### **Regional difference in action needs:**

The Draft BGWMP 2026-2036 does not seem to us to adequately distinguish between the differing priority needs and opportunities for management and prevention of spread that exist across the range of habitats and regions of Buffel Grass occurrence in the NT. In particular, it does not explore the need for preventive and vigorous curtailment (local eradication) responses in the Katherine and Darwin Weed Management Regions, where Buffel Grass is not yet as firmly established (and where it may be under strongest selective pressure for novel genetic adaptations to local conditions). To neglect a vigorous response in those regions is to invite spread and deeper entrenchment. We would support an approach that declared Buffel Grass as a Class A weed (eradication required) in the Katherine and Darwin Weed Management Regions, and its listing as a Class B weed in all other parts of the NT. This would more adequately reflect regional needs and management opportunities.

### **Spread control issues:**

We believe that the current Draft BGWMP takes an overly passive approach to spread issues by envisaging mandatory management only in the Alice Springs and Tennant Creek Weed Management Regions; a more consistent and NT-wide approach to spread control in transport corridors (and other spread pathway tenures) is needed.

Similarly, restricting the focus (as per the Draft Plan) of the Buffel Grass Education and Assistance Program to the Central Australian region, and not actively promulgating it Territory-wide, would be both a missed opportunity and an unintended contribution to spread and establishment of Buffel Grass in other areas of the NT.

### **The proposed pastoral tenure permitted exemptions:**

Sections 6, 7, and Appendix A are the most problematic aspects of the Draft Plan, in our view.

The 10-year pastoral exemptions envisaged in the Draft BGWMP 2026-2036 will in effect kick the management can down the road for a decade, during which the problem will become more entrenched and the damage done will become more permanent – particularly given that the permitted exemptions will allow the importation of further varieties of the two (or three) Buffel Grass species, quite possibly including even hardier variants, that will contribute to range and habitat extension and potentially (indeed very probably) to in-situ genetic diversification and further adaptation to the Australian environment.

We doubt whether 10-year blanket exemption permits will provide much incentive for pastoral land managers to document and share data about varieties introduced, monitoring, spread prevention, and other desirable information elements, especially when DBGWMP Section 7 (Compliance) states: “*Formal instruction, enforcement or issuing of penalties will not be a focus of Draft Buffel Grass Weed Management Plan 2026 – 2036 management operations but may be undertaken in response to the detection of significant breaches or emerging issues*” for the key activities detailed in Appendix A – all of which contribute to the further spread and establishment of Buffel Grass, and to the disproportionate onus on non-exempted tenures.

Buffel Grass, and Gamba Grass in areas to the north, are major biodiversity and cultural threats right across Northern Australia, and for the Northern Territory Government to take a laissez-faire approach to Buffel Grass management, as the permitted exemptions in the DBGWMP seem set to do, will contribute to a *national* problem. The NT Government may take the view that its responsibilities are only to the NT, but that would be short-sighted – these broad-scale biodiversity threats (many more of which loom on the biosecurity doorstep) cannot be effectively fought, or ignored, on the basis of a response fragmented by jurisdictions or tenures.

We note in passing that the DBGWMP 2026-2026 does not refer at any point to the *Northern Australia Biosecurity Strategy 2030* (Northern Australian Biosecurity Framework Reference Group, 2020), and nor does the NT’s overarching *Buffel Grass Management Strategy: Central Australia 2024 – 2030*, which are concerning omissions given that national strategy’s importance, and given that the DBGWMP proposes to allow the unrestricted import of Buffel Grass seed (including of varieties or hybrids new to the NT) with no compulsory registration of the material and its locations of use. This will greatly complicate the task of understanding the ecological dynamics of Buffel Grass in the landscape, and of any future efforts at novel control methods.

### **Recommendations:**

Rather than generate a separate set of recommendations, Plant Conservation Australia endorses the summary recommendations made by the Invasive Species Council in their submission (Feb. 2026) on the DBGWMP2026-2036, i.e.:

*ISC Recommendation 1:* Urgently declare Buffel Grass in the Katherine and Darwin Weed Management Regions as a Class A weed (requiring eradication) to prioritise early intervention, while mandating it as at least a Class B weed (growth and spread to be controlled) in the remainder of the Northern Territory.

*ISC Recommendation 2:* Management requirements must be extended to all conservation areas and transport corridors across the entire Northern Territory, rather than limiting these requirements to only the Alice Springs and Tennant Creek Weed Management Regions.

*ISC Recommendation 3:* The Buffel Grass Education and Assistance Program should be available to all conservation land managers, transport corridor managers, and interested private, public, and Aboriginal landholders across the Northern Territory, rather than being restricted to Central Australia.

*ISC Recommendation 4:* We strongly oppose the proposed 10-year industry-wide exemption for pastoralists. If a permit system is implemented, it must have significantly shorter timeframes, regular review periods, and mandatory reporting and monitoring requirements.

*ISC Recommendation 5:* Formally support the WoNS (Weed of National Significance) nomination, and that Buffel Grass be listed as a standalone Key Threatening Process under national law to reflect the severity and scale of its impact.

These recommendations would address the most critical issues with the Draft Plan, and we fully support them.

Thank you for the opportunity to comment on the Draft Plan.

Yours sincerely

**Jo Lynch (Business Manager)**

for **Plant Conservation Australia**

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**Cc:** NT Environment Centre; Central Lands Council; Invasive Species Council.