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16 February 2026

Hon Joshua Burgoyne
Minister for Lands, Planning and Environment;
Minister.Burgoyne@nt.gov.au

Submission on the Draft Buffel Grass Weed Management Plan

Thank you for the opportunity to comment on the draft Buffel Grass Weed Management Plan.

Unfortunately, this plan feels like an emperor's new clothes moment. If the desired effect was to give guidance on the legal requirements around weed declaration and arrest the negative impacts of buffel grass invasion, in line with recent weed declaration and good weed management practice, then this plan is not the plan. It will not work.

Everybody knows buffel grass does not stay within boundaries, nor do the fires, smoke or pollen it causes. What is effectively a blanket permission to plant and spread buffel on pastoral leases will cause the extent of buffel invasion to increase both on and off pastoral leases. It ensures a future of ecosystem decline. It undermines the efforts on other land tenures.

My concerns are confirmed by comments from NTCA Alice Springs Chair David Driver ABC Country Hour on 10 February 2026 who states "There are certain restrictions on it *(buffel)* but as I've read ***it allows the pastoral sector to continue on roughly the way we have***" [1]

I reach the following conclusion:

This draft plan is unacceptable and will not work. It fails because

- **It does not treat the problems with buffel grass seriously enough - it is too weak.**
- **By not managing buffel invasion on all land tenures and Territory wide, it is ignoring the NT guidance and evidence on how buffel spreads and how to efficiently manage invasive weeds.**
- **It unfairly apportions the management responsibilities on those not causing the problem.**
- **It will be very costly to Territorians - it undermines our overall opportunities for prosperity.**
- **It lacks the clarity and simplicity of the comparable Gamba Weed Management Plan - it should be written using the same template. The government should legislate management categories to enable this.**

There remains an opportunity to build a consensus and make this plan work. Key steps include rebuilding the Weed Advisory Committee, rewriting the draft plan and resubmitting it for public consultation. The rewritten plan must be evidence based and draw upon the results of an economic analysis that is underway. It also needs to be supported by a Plan Statement of Effect. This should be assessed as a Strategic Policy by the NTEPA.

Assessment as a Strategic Policy by the NTEPA is appropriate given this plan's impacts on sites of National and International environmental significance and the threat of buffel grass invasion to ecosystems, species and key refugia. This draft weed management plan seeks to bypass protections of the Weeds Management Act, for sites of National and International environmental significance on Pastoral Leases.

[1] https://www.abc.net.au/listen/programs/nt-country-hour/nt-country-hour/106313594

I implore you and the Buffel Grass Weed Advisory Committee to take the threat of buffel grass invasion seriously and rewrite the plan accordingly.

This is an immense opportunity. Given the extent of the country that buffel is yet to invade, the full impacts of buffel grass invasion are tragic and hard to fathom.

There are many examples of success in managing invasive grasses at scale, including progress with the gamba weed management plan in the NT and the South Australian buffel grass weed management strategy. Please add this plan to the list!

Thank you for your consideration.

Kind regards,

Adrian Tomlinson

Copies to:
NT Weeds Branch Have Your Say Survey
NTEPA, Attention: Dr Paul Vogel

Submission - draft Buffel Grass Weed Management Plan

CONCLUSION

This draft plan is unacceptable and will not work. It fails because:

- **It does not treat the problems with buffel grass seriously enough - it is too weak.**
- **by not managing buffel invasion on all land tenures and Territory wide, it is ignoring the NT guidance and evidence regarding how buffel spreads and how to efficiently and effectively manage invasive weeds**
- **It unfairly apportions the management responsibilities to those not causing the problem.**
- **It will be very costly to Territorians - it undermines overall opportunities for prosperity.**
- **Lacks clarity and simplicity of the comparable Gamba Weed Management Plan - it should be written using the same template. The government should legislate management categories to enable this.**

There remains an opportunity to build a consensus and make this plan work. Key steps include rebuilding the Weed Advisory Committee, rewriting the draft plan and resubmitting it for public consultation. The rewritten plan must be evidence based and draw upon the results of an economic analysis. It also needs to be supported by a Plan Statement of Effect. This should be assessed as a Strategic Policy by the NTEPA.

SUMMARY OF RECOMMENDATIONS

PART 1. FOUNDATIONAL CONCERNS & PATHWAY FORWARD

1. **Statement of effect** by an independent peer organisation to determine what the effect of implementing this Weed Management Plan will be and whether it is cost effective and fair.
2. As this plan risks serious environmental harm, the statement of effect and the draft plan should be referred to the NT Environmental ProtectIon Authority as a 'strategic proposal' for **environmental impact assessment**. This would facilitate informed public input into the plan. (I understand this approach is taken in Western Australia to facilitate evaluation of significant government plans.)
3. The **economic evaluation** being undertaken by Charles Darwin University needs to be completed and its findings used to inform this plan, and evaluate scenarios.
4. **Release of public feedback on the previous have your Say in early 2025**, so the public can ensure that the plan is calibrated to public opinion.
5. **Refresh of the Buffel Grass Weed Advisory Committee** to include greater representation of sectors impacted by buffel grass and expertise in weed management and planning. It should not include those with vested (pecuniary) interest in the planting and spread of buffel grass or who are seeking to undermine weed declaration. If these interests are to be involved, they should be as observers/or a minority, interests must be declared and full minutes published[2].
6. **Regulatory clarity**, including the priority of early intervention needs to be enshrined by:
   a. Classifying buffel grass in the Katherine and Darwin Weed Management Regions as a Class A weed (for eradication)
   b. Classifying buffel grass in Tennant Creek and Alice Springs Weed Management Areas that are current not already infested as a Class A weed (requiring eradication) and class B in infested areas
7. If the Minister seeks to support one sector at cost to others then an **impactor pays model** is needed.
8. An updated draft must be **readvertised for public comment.**

[2] The interview (https://www.abc.net.au/listen/programs/nt-country-hour/nt-country-hour/106313594) reports that the cattle industry '..will push for buffel's weed classification to be overturned.' This raises questions about whether the industry's participation on the Buffel Grass Weed Advisory Committee was in good faith.

PART 2 - GENERAL REVIEW

- ***The plan lacks the clarity and simplicity of the comparable Gamba Weed Management Plan. This plan should be written using the same template. (Refer section 2.1 in Part 2)***
- ***The NTG should provide legislative clarity by declaring management categories for buffel across the Territory under 7 (4) of the Weeds Management Act 2001. (2.1)***
- ***The Reasonable Measures established in the plan should apply everywhere, including on pastoral leases. (2.2)***
- ***Pastoral leases must <u>not</u> be exempt from the weed management duties under the Weeds Management Act and described in the weed management plan. The Pastoral Lands Act is unsuitable for this purpose. (2.2)***
- ***To be compatible with recognised best practice in weed management and NT policy guidance the "management requirements" should apply across the entire Northern Territory, not just "Central Australia"***
    - ***In the Katherine and Darwin Weed Management Regions buffel glass should be declared a category Class A weed (requiring eradication) to prioritise early intervention.***
    - ***In the Central Australian and Alice Springs and Tennant Creek Weed Management Regions, buffel grass should be managed as a class A weed on all land tenures where it is yet to establish/localised or it is a priority for eradication, and class B in areas where buffel is established. (2.2.2)***
- ***An industry wide Pastoral Use Permit is absolutely inappropriate. Permits need to be applied for individually and assessed individually by the regulator and held by the land manager. The industry wide permit will further planting and spread of buffel grass. (2.2.3)***
- ***The Northern Territory Cattleman's Association is an unsuitable permit holder. It is on record as actively lobbying to have buffel grass 'undeclared' as a weed. (2.2.3)***
- ***I request to present to the Buffel Grass Weed Advisory committee on soil erosion associated with buffel grass invasion and impacts of livestock grazing of buffel grass, (2.2.4)***
- ***NTG needs to address myths about buffel and erosion; buffel's overstated value as pasture; and provide accurate information on the economic contribution of buffel grass/pastoral industry (2.2.4)***
- ***The education section (7.1) of the draft Buffel Grass Weed Management Plan needs to be updated to include the Pastoral sector and proactively provide information on the problems with buffel grass and responsibilities associated with weed management. (2.2.4)***
- ***The environment, First Nations people, community amenity, commercial activities with an interest in buffel management, and health (as described in the section below) have been sidelined by allowing the continued planting and spread of buffel grass. (2.3)***
- ***The impacts of different weed management scenarios on the environment, First Nations people, Community amenity, commercial activities with an interest in buffel management, and health (as described in the section below) need to be modelled and the plan rewritten to optimise protection of these values. (2.3)***
- ***Conservation areas: All areas identified as being of International or National Conservation significance in the Buffel Grass Management Strategy: Central Australia 2024 -2030 should be included in the "Conservation Areas" category in the Buffel Grass Weed Management Plan. Territory wide all conservation areas should be protected from Buffel grass invasion. (2.3.1)***
- ***This plan, which would allow the introduction of a declared weed into or adjacent to sites of conservation significance, risks significant and irreversible harm to ecological communities and species. This draft plan should be referred as a Strategic Proposal, as defined in S13 of the Environmental Protection Act 2019, to the NTEPA for environmental impact assessment. (2.3.1)***
- ***Declaration of Class A zones in uninfested areas and individual permits, which take into account local environmental considerations, are needed to protect the environmental values of Crown land under pastoral lease and facilitate proper management of buffel grass invasion (2.3.1)***
- ***A weak plan with ineffective legal controls threatens the security of Federal Investments in conservation in the Northern Territory and opportunities for carbon farming. (2.3.1)***
- ***This plan is not doing enough to address impacts on Aboriginal people. Aboriginal people were not adequately represented on the WAC that drafted this plan (refer section 2.7) and have not been provided with appropriate***

means of engagement prior to this plan being released (refer section 2.8). These shortcomings need to be urgently addressed. (2.3.2)

- ***This plan does not do all it can to support the many sectors of the community negatively impacted by buffel including. The plan is weaker than the community and industry demand for Buffel Weed Management in the open letter (https://www.alec.org.au/buffelweeddec_openletter). (2.3.3)***
- ***The costs to industries and communities of the adverse impacts buffel grass invasion that would be incurred under this weak weed management plan versus the costs of one which focused on stopping the planting and spread under all land tenures needs to be modelled in the economic analysis and the costs minimised in the final weed management plan (refer also section 2.6). (2.3.3)***
- ***The full health costs associated with the adverse impacts of buffel grass invasion described in the report[3] need to be recognised and considered in the buffel grass weed management plan and the CDU economic evaluation (refer also 2.6). (2.3.4)***
- ***The health costs from the adverse impacts buffel grass invasion that would be incurred under this weak weed management plan versus one which is focused on stopping the planting and spread under all land tenures needs to be modelled in the economic analysis and the costs minimised in the final plan. (2.3.4)***
    - ***Does not meet the purpose of weed declaration of 'preventing the plant entering into, and managing the plant in, the Territory' (2.4.1)***
- ***All activities that need to be permitted under the Weeds Management Act should be permitted. (2.4.2)***
- ***Legality of proposed modification of permitting arrangements from expectations under the Weed Management Act is legally questionable. This should be examined and legal advice published. (2.4.2)***
- ***I object to the proposed industry-wide permit. All land uses, including pastoral uses, should be subject to individual permits in accordance with the Weeds Management Act 2001. (2.4.3)***
- ***More information on the proposed industry-wide permit should have been available at the time of this plan being drafted. (2.4.3)***
- ***I object to the proposal in the Draft Plan to define 'reasonable measures' for pastoral lands differently to other land tenures by seeking to define reasonable measures based upon Pastoral Lands Act and bypass the Weeds Management Act (2.4.4)***
- ***Reasonable measures as defined in the weed management plan, in accordance with the Weeds Management Act must apply to all land uses and on all land tenures. (2.4.4)***
- ***A mechanism needs to be included in the Weed Management Plan to ensure permits are terminated and updated upon revision of this plan. (2.4.5)***
- ***Planting advice Agnote No: E28 August 2010 Buffel Grass (A pasture grass for sandy soils) should have been removed when buffel grass was declared a weed. It must urgently be removed now. (2.4.6)***
- ***The plan makes unfair concessions to pastoral lease holders, this unequally distributes the burden of effort required under the plan, jeopardises plan effectiveness and is ultimately socially divisive. (2.5)***
- ***Charles Darwin University economic analysis will provide crucial data that is required before the draft plan can be prepared and the public can make informed commentary. The plan should be delayed until this study is complete and to take into account its findings. (2.6)***
- ***The scope of works for the economic analysis should be sufficiently broad to take into account the many impacted sectors, equity and 'non monetised' costs of buffel grass invasion. It should be publicly available. (2.6)***
- ***What is the cost of this plan? Its impacts and community cost should be modelled and compared to a stronger plan that manages buffel and reported via the proposed 'statement of effect'. (2.6)***
- ***An impactor pays model should apply for any planting or deliberate spread of buffel. (2.6)***
- ***The Buffel Grass Weed Advisory Committee needs to be representative. This includes:***
    - ***Greater First Nations representation including representatives from different regions and genders***
    - ***Environmental interests***

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3 https://www.lettersfortheenvironment.com/wp-content/uploads/2025/09/Buffel-Grass-Invasion-in-Central-Australia-Impacts-on-Human-Health-8-4.pdf

    - ***Businesses adversely impacted by buffel and those which could contribute positively to the buffel grass weed response***
    - ***Expertise in policy and weed management planning (2.7)***
- ***Committee members with a pecuniary interest that is not aligned with weed management declaration should be observers and not have voting status. (2.7)***
- ***The Committee should publish its minutes in full, to normal minute taking standards. (2.7)***
- ***The results of the previous Have Your Say should have been available when this draft was released to enable assessment of how this draft aligns to community expectations. It needs to be released urgently and certainly well before the Buffel Grass Weed Management Plan is finalised. (2.8)***
- ***The shortcomings of consultation need to be acknowledged and the implications of this to the feedback received recognised. Effective strategies to provide information and valid approaches to determine the opinions of groups with a stake in buffel grass management outcomes undertaken prior to finalisation of the plan, (2.8)***
- ***An improved draft plan needs to be resubmitted for public consultation. (2.8)***
- ***I request that my previous submission also be considered***

  https://www.lettersfortheenvironment.com/wp-content/uploads/2025/07/Letter-Have-Your-Say-Buffel-Grass-Management-Part-1.docx-3-4.pdf (other)

PART 3 CONCERNS & SUGGESTIONS WITH PLAN TEXT AND MANAGEMENT REQUIREMENTS

Please refer to recommendations in the fourth column of the table. (Note the commentary in this table is not intended to be exhaustive.)

PART 1. FOUNDATIONAL CONCERNS & PATHWAY FORWARD

To address foundational concerns with this plan, the following needs to happen before this draft is finalised.

1. **Statement of effect** by an independent peer organisation to determine what the effect of implementing this Weed Management Plan will be and whether it is cost effective and fair.
2. As this plan risks serious environmental harm, the statement of effect and the draft plan should be referred to the NT Environmental ProtectIon Authority as a 'strategic proposal' for **environmental impact assessment**. This would facilitate informed public input into the plan. (I understand this approach is taken in Western Australia to facilitate evaluation of significant government plans.)
3. The **economic evaluation** being undertaken by Charles Darwin University should be completed and its findings used to inform this plan
4. **Release of public feedback on the previous have your Say in early 2025**, so the public can ensure that the plan is calibrated to public opinion.
5. **Refresh of the Buffel Grass Weed Advisory Committee** to include greater representation of sectors impacted by buffel grass and expertise in weed management and planning. It should not include those with vested (pecuniary) interest in the planting and spread of buffel grass or who are seeking to undermine weed declaration. If these interests are to be involved, these interests must be declared and full minutes published[4].
6. **Regulatory clarity**, including the priority of early intervention needs to be enshrined by:
    a. Classifying buffel grass in the Katherine and Darwin Weed Management Regions as a Class A weed (requiring eradication)
    b. Classifying buffel grass in Tennant Creek and Alice Springs Weed Management Areas that are current not already infested as a Class A weed (requiring eradication) and class B in infested areas
7. If the Minister has privately decided to support one sector at cost to others then an **impactor pays model** is needed.
8. An updated draft must be **readvertised for public comment.**

[4] The interview (https://www.abc.net.au/listen/programs/nt-country-hour/nt-country-hour/106313594) reports that the cattle industry '..will push for buffel's weed classification to be overturned.' This raises questions about whether the industry's participation on the Buffel Grass Weed Advisory Committee was in good faith.

PART 2 - GENERAL REVIEW

LACKS CLARITY & MISSING KEY ELEMENTS,
TECHNICALLY UNSOUND,
TOO WEAK - LETS THE ENVIRONMENT & KEY SECTORS DOWN,
LEGALLY QUESTIONABLE,
INEQUITABLE - UNFAIR & DIVISIVE,
ECONOMIC ANALYSIS MISSING - COSTS & COST SHIFTING,
CONSULTATION AND COMMUNICATIONS,
GOVERNANCE ISSUES

2.1 Plan lacks clarity and key elements of a weed management plan

This plan is very unclear and complicated when compared to the Gamba Weed Management Plan.

In the section on legal issues I raise concern that the draft plan introduces unnecessary complexity and legal questions by seeking to vary the weed management responsibilities established via weed declaration, rules for permitting under the Weeds Management Act 2001, and reasonable measures established in the weed management plan for pastoral land uses.

It also lacks the clarity that declaration management categories under 7(4) of the Weeds Management Act 2001.

Recommendation

- ***The plan lacks clarity and simplicity of the comparable Gamba Weed Management Plan. This plan should be written using the same template***
- ***The NTG should provide legislative clarity by declaring management categories for buffel across the Territory under 7 (4) of the Weeds Management Act 2001.***

2.2 Technically unsound

2.2.1 Buffel grass needs to managed on all land tenures

A plan that does not manage invasive buffel grass on all lands simply will not work. It will lead to further invasion of land within the pastoral estate and cross border excursions of buffel grass, fires and pollution onto neighbouring lands.

The need to manage effectively on all land tenures is highlighted in NT operational guides like 'Preventing Weed Spread'[5], which the draft Buffel Grass Weed Management Plan establishes (p5) as a 'management component' of the draft weed management plan.

> *Weeds don't recognise property or political boundaries. Everyone has a role to play in protecting all land. Weed spread prevention is always the most successful and cost effective type of weed management. This document describes simple spread prevention techniques that are able to be applied by all Territorians, including land managers and business operators, with a view to protecting our valuable and diverse resources from the impacts of weeds.*

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5 https://environment.nt.gov.au/media/docs/rangelands/weed-management-publications/preventing-weed-spread.pdf

Recommendations:

- ***The Reasonable Measures established in the plan should apply everywhere, including on pastoral leases.***
- ***Pastoral leases must <u>not</u> be exempt from the weed management duties under the Weeds Management Act and described in the weed management plan. The Pastoral Lands Act is unsuitable for this purpose.***

2.2.2 Buffel grass needs to managed Territory wide

It is a well established weed management practice that focusing efforts on early intervention is most efficient and effective.

This principle is made clear in the NT Weed Management Handbook [6]which highlight that key priorities included preventing introduction and eradicating new/isolated outbreaks, particularly those high in the catchment and close to water sources in its section 'Strategic and Planned Approaches to Weed Management'.

There are many parts of the Alice Springs and Tennant Creek Weed Management Areas which are not invaded. These occur both within pastoral leases and under other land tenures.

Buffel grass has also been identified as a sleeper weed in the Top End[7]. In the Cenchrus ciliaris Weed Risk Assessment Summary Review 2022, buffel grass was considered to have a high feasibility of control in the Darwin Weed Region. It is anecdotally reported and self-evident from maps that buffel grass is extending in the Victoria River District (and the Kimberley).

Furthermore management requirements need to be Territory-wide to be effective. This will help managing introduction of buffel grass seeds into the Territory, minimise potential for intra-Territory movement and be compatible with National efforts to move away from buffel grass.

Recommendation

To be compatible with recognised best practice in weed management and NT policy guidance the "management requirements" should apply to the entire Northern Territory, not just "Central Australia"

- ***In the Katherine and Darwin Weed Management Regions buffel glass should be declared a category Class A weed (requiring eradication) to prioritise early intervention***
- ***In the Central Australian and Alice Springs and Tennant Creek Weed Management Regions, buffel grass should be managed as a class A weed on all land tenures where it is yet to establish/localised or it is a priority for eradication, and class B in areas where buffel is established.***

2.2.3 Industry wide permit won't work

The plan proposes an industry wide "Pastoral Use" permit.

The considerations for buffel grass are site specific. Proposals need to be considered by an expert on a case by case basis and taken seriously by the land manager, with binding commitments agreed that are understood by both the permit recipient and the land manager.

Not even requiring individual permits means there is no transparency about what is being planted and what management practices are being employed. This makes evaluation and continuous improvement improvement extremely difficult/impossible

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[6] https://nt.gov.au/_media/docs/environment/weeds/nt-weed-management-handbook.pdf

[7] -https://www.ecnt.org.au/the_state_and_future_of_the_northern_territory_s_savannas_full_report

Remarkably it has been suggested that the intention would be for this permit to be held the cattle industry industry lobby group the NT Cattlemen's Association, which as recently as 12 February 2026 confirmed it remains opposed to the Buffel Grass Weed Declaration. In the same interview it made clear it does not understand the issues with buffel grass or appreciate how it moves off pastoral lease[8].

Recommendations:

An industry wide Pastoral Use Permit is absolutely inappropriate. Permits need to be applied for individually and assessed individually by the regulator and held by the land manager. The industry wide permit will further planting and spread of buffel grass.

The Northern Territory Cattleman's Association is an unsuitable permit holder. It is on record as actively lobbying to have buffel grass 'undeclared' as a weed.

2.2.4 The main arguments for buffel grass are based on <u>false premises</u>

There appear to be three main arguments for buffel grass which are not supported by evidence. At market stalls, shops and on social media, the arguments for buffel always come back to.

1. Soil erosion and dust storms - buffel grass stopped the dust storms in the 1960s about buffel's deep roots and springing back after rain.
2. Cows love it - its the best pasture
3. Economic contribution of the cattle industry

False premise 1. Stopped the dust storms and stops erosion

Claims about soil erosion are not supported by evidence. They are jarring given the extent of land degradation and ecosystem degradation we are witnessing in Central Australia in buffel invaded areas. There are many examples where land under pastoral lease is being stocked with native plants.

Please refer to the presentation
https://www.lettersfortheenvironment.com/wp-content/uploads/2021/06/Buffel-Grass-and-Soil-Erosion-with-references-2.pdf

I request to present a more detailed version of this presentation to staff and the Buffel Grass Weed Advisory Committee.
In short the presentation highlights that buffel grass contributes to erosion via many pathways including

- Destroying woody vegetation and thus inviting strong surface winds at the soil surface;
- Changes the way water flows across the catchment and in rivers;
- Increases the frequency and intensity of fires;
- Changes soil structure (microbiome, takes up nutrients and inhabits soil friendly animals)

It also addresses the myth that buffel grass stopped the dust storms. While buffel grass was planted through the 1960s the decline in dust storms strongly correlates with and has been attributed to the end of a decadal drought, general recovery of vegetation after triple La Nina in the early-mid 1970s and changes in wind patterns. There was not a continuing diminishment of dust storms as buffel grass became more widespread from the 1980s onwards.

[8] https://www.abc.net.au/listen/programs/nt-country-hour/nt-country-hour/106313594

False Premise 2 - Overstatement of buffel grass's value as a feed source

There are concerns with buffel grass as a pasture grass, due to evidence of dieback[9] [10], pasture run-down[11], oxalate poisoning and its adequacy to provide protein and energy to maintain adult dry stock[12]. The perceived pastoral value of buffel grass presents a challenge associated with its management [13].

Given these concerns as a long-term pasture and devastating environmental and social impacts, the NTG should be raising awareness of the concerns and fostering research that leads the pastoral leaseholders towards sustainability. There is an opportunity to research native species displaying characteristics of resilience and nutritional value, in addition to species that can be used to encourage recovery and succession post buffel grass removal. This will assist in both managing impacts to pastoral enterprises and reducing the likelihood of reinvasion through competition

Continued reliance on buffel by the pastoral industry will allow more buffel to be spread and more vigorous types to be introduced. Discouraging the use of more suitable native grasses is potentially blocking establishment of a native grass seed industry and preventing research into biological controls.

False premise 3 - The Pastoral Industry keeps the economy afloat

Refer section 2.5 and figures which highlight the relatively small economic and employment contribution to the Central Australian and NT economy (~4%) and large land footprint. Given buffel grass's rapid spread, ubiquitous negative impacts and difficulty in remediation, this is an astounding claim which the NTG should be countering.

Recommendations

- ***I request to present to the Buffel Grass Weed Advisory committee on soil erosion associated with buffel grass invasion and livestock grazing of buffel grass.***
- ***NTG needs to address myths about buffel and erosion, buffel's overstated value as pasture, and provide information on the economics around buffel grass invasion.***
- ***The education section (7.1) of the draft Buffel Grass Weed Management Plan needs to be updated to include the Pastoral sector and proactively provide information on the problems with buffel grass and responsibilities associated with weed management.***

2.3 Too weak and fails the environment, First Nations people, community amenity, commercial activities with an benefiting from buffel free lands, and health

By not effectively managing the spread within and between land tenures and not stopping further invasion this plan does not address the serious risk to the environment and creates even more risks, First Nations people, many industries including the arts and tourism.

Recommendations

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[9] https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0004/1582042/PastureDiebackGuide2ndED_low-res.pdf
[10] https://connectsci.au/cp/article/75/9/CP23340/81439/Mapping-pasture-dieback-impact-and-recovery-using
[11] https://www.mla.com.au/contentassets/91c28328a3a84affab7208d62b6e33fb/b.nbp.0624_final_report.pdf
[12] https://cdn.environment.sa.gov.au/landscape/docs/saal/20180117_nutritional_grasses_fs.pdf https://onlinelibrary.wiley.com/doi/full/10.1002/ece3.6724
[13] https://cdn.environment.sa.gov.au/landscape/docs/saal/20180117_nutritional_grasses_fs.pdf https://onlinelibrary.wiley.com/doi/full/10.1002/ece3.6724

The environment, First Nations people, community amenity, commercial activities with an interest in buffel management, and health (as described in the section below) have been sidelined by allowing the continued planting and spread of buffel grass.

The impacts of different weed management scenarios on the environment, First Nations people, Community amenity, commercial activities with an interest in buffel management, and health (as described in the section below) need to be modelled and the plan rewritten to optimise protection of these values.

Note. *These issues were raised in the previous Have Your Say, but the consideration of these has not been published.*

2.3.1. Lets the environment down

The effort is not in proportion to the threat.
Invasive species are the most common key threatening process for threatened species in Australia. Of invasive species threats in arid and semi-arid areas of Australia buffel grass is recognised as at least equivalent in magnitude to those posed by invasive animals and possibly higher, because unlike these more recognized threats, buffel has yet to occupy its potential distribution[14].

Buffel Grass threatens Environmental Protection and Biodiversity Conservation listed species and this plan will make this threat worse. Thirty-one EPBC threatened species are currently impacted, or are at risk of impact nationally. A large fraction of these are in the NT. Threatened species for which buffel grass is a threat include Northern Hairy Nosed Wombat, Malleefowl (Nganamara), Slater's Skink, Greater Bilby (Ninu), Night Parrot, Princess Parrot, Central Rock-rat (Antina), Undoolya Wattle / Sickle-leaf Wattle, Central Australian Cabbage Palm, MacDonnell Ranges Cycad, Warru and Great Desert Skink. A weak plan threatens the security of Federal Investments in conservation in the Northern Territory.

The definition of conservation areas is too narrow.
I object to the narrow definition of conservation areas in the draft buffel grass weed management plan.

The map in the Buffel Grass Management Strategy Central Australia 2024-2030 highlights far more substantial areas of International and National Conservation Significance, including the East Macs and Davenport Ranges. These are clearly threatened by buffel grass invasion but these are ignored where they overlap with pastoral leases. No case has been made to avoid protections of weed declaration in these areas and they must be protected. Facilitating further buffel grass invasion of these areas

Decline of biodiversity and 'high value' areas on pastoral leases
More broadly I am also concerned about decline in ecosystem values on Pastoral Leases, if these areas were to become invaded. For example hummock grasslands, waterways, coolibah stands, waterholes and many sacred sites are all especially vulnerable to buffel grass invasion. Continued spread of buffel into these areas will be a significant diminishment of publicly owned lands, reduce ecosystem resilience and Native Title Holder's rights.

Recommendations

Conservation areas: All areas identified as being of International or National Conservation significance in the Buffel Grass Management Strategy: central Australia 2024 -2030 should be included in the "Conservation Areas" category in the Buffel Grass Weed Management Plan. Territory wide all conservation areas should be protected from Buffel grass invasion.

[14] https://pmc.ncbi.nlm.nih.gov/articles/PMC7713970/

This plan, which would allow the introduction of a declared weed into or adjacent to sites of conservation significance, risks significant and irreversible harm to ecological communities and species. This draft plan should be referred as a Strategic Proposal, as defined in S13 of the Environmental Protection Act 2019, to the NTEPA for environmental impact assessment.

Declaration of Class A zones in uninfested areas and individual permits, which take into account local environmental considerations, are needed to protect the environmental values of Crown land under pastoral lease and facilitate proper management of buffel grass invasion.

A weak plan with ineffective legal controls threatens the security of Federal Investments in conservation in the Northern Territory and opportunities for carbon farming. (2.3.1)

2.3.2 Lets First Nations People Down

Clear statements have been made by Aboriginal leaders and groups about the severe problems buffel is causing. For example: https://www.indigenousdesertalliance.com/publications/umuwa-statement-on-buffel-grass

Buffel grass has been assessed as the greatest threat to cultural values for First Nations people in central Australia when compared to five other well-documented threats including large feral herbivores (camels,horses), rabbits, foxes, cats and inappropriate fire regimes (Read et al, 2020). Buffel invasion impacts these in many ways including adverse impacts on:

- Bush foods, bush medicines and hunting practices
- Culturally significant species
- Accessing Country
- Sacred sites
- Intergenerational knowledge sharing
- Cultural burning practices, and
- Healthy country.

Recommendations

This plan is not doing enough to address impacts on Aboriginal people. Aboriginal people were not adequately represented on the WAC that drafted this plan (refer section 2.7) and have not been provided with appropriate means of engagement prior to this plan being released (refer section 2.8). These shortcomings need to be urgently addressed.

2.3.3. Lets the Community and Multiple industries down

The impacts on many industries such as Tourism and the Arts have been widely documented as have the general reduction in social amenity, fire and infrastructures risks we all suffer posed by buffel invasion. Eg Refer ALEC firestorm report[15] and open letter from many industries and peak organisations calling for a class A/B weed declaration in the NT [16].

Recommendations

- ***This plan does not do all it can to support the many sectors of the community negatively impacted by buffel including. The plan is weaker than the community and industry demand for Buffel Weed Management in the open letter (https://www.alec.org.au/buffelweeddec_openletter).***
- ***The costs to industries and communities of the adverse impacts buffel grass invasion that would be incurred under this weak weed management plan versus the costs of one which focused on stopping the planting and***

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15 https://assets.nationbuilder.com/aridlands/pages/4308/attachments/original/1722228789/240626_NT_Buffel_Position_Paper_%28ALEC%29_FINAL.pdf?1722228789

16 https://www.alec.org.au/buffelweeddec_openletter

spread under all land tenures needs to be modelled in the economic analysis and the costs minimised in the final weed management plan (refer also section 2.6).

2.3.4 Health costs and impacts not sufficiently considered

The Buffel weed management plan is not doing all it can to minimise health costs. These are detailed in the linked report. These should be evaluated in the statement of effect and economic analysis.

https://www.lettersfortheenvironment.com/wp-content/uploads/2025/09/Buffel-Grass-Invasion-in-Central-Australia-Impacts-on-Human-Health-8-4.pdf

Recommendations

- ***The full health costs associated with the adverse impacts of buffel grass invasion described in the above report need to be recognised and considered in the buffel grass weed management plan and the CDU economic evaluation (refer also 2.6).***
- ***The health costs from the adverse impacts buffel grass invasion that would be incurred under this weak weed management plan versus one which is focused on stopping the planting and spread under all land tenures needs to be modelled in the economic analysis and the costs minimised in the final plan***

2.4 - Legal issues

2.4.1 Goes against the intention of the Weed Declaration

Recommendation

Does not meet the purpose of weed declaration of 'preventing the plant entering into, and managing the plant in, the Territory'. (self explanatory)

2.4.2 Modifies what needs to be permitted

The proposal in the Draft Plan to set out what 'low-risk' activities that would otherwise constitute non-compliance with duties under the Weeds Management Act can be carried out without a permit is unlikely to be effective. This proposal appears beyond the power of a weed management plan and inconsistent with permit provisions in the Weeds Management Act.

Appendix A appears intended to list conduct, according to each section 9E duty mentioned in column 1, that does not require a permit. However, this will not operate to modify the meaning of the Act. The Draft Plan cannot alter the legal meaning of the legislation enabling it. The relationship between Acts and statutory instruments made under Acts (such as the Draft Plan) is such that the power to make instruments must be "read and construed subject to the Act under which it is made and so as not to exceed the power" of the authorising provision.

Appendix A to the Draft Plan appears to frame certain conduct as not requiring a permit. It says "[s]ection 9E of the Act outlines a number of requirements for 'all persons'. Many of these activities are considered a lower risk and will not be an operational or compliance focus under this Plan". In the table, the heading to column 2 reads "Not deemed to be an operational or compliance focus under this Plan- permits will not be required".

This approach runs up against the limitations of the permit only being able to be issued in accordance with the Weeds Management Act, specifically section 28F of the Act. The Draft Plan can explain the intended operation of permits and outline how applications will be processed and decided but cannot be used to change when a permit is required: that

is set out in section 9E(2) of the Weeds Management Act.

Recommendations:

- ***All activities that need to be permitted under the Weeds Management Act should be permitted.***
- ***Legality of proposed modification of permitting arrangements from expectations under the Weed Management Act is legally questionable. This should be examined and legal advice published.***

2.4.3 Legality of industry wide permit

I object to the Industry wide permit both as conceptually unsound to manage the impacts of buffel grass (see 2.2.2) and also legally questionable (follows).

The proposal for an 'industry wide permit' in the Draft Plan appears inconsistent with permit provisions in the Weeds Management Act. If the NT Government proceeds with an approach in the Draft Plan to issuing permits that conflicts with the Act there may be problems in implementation;

A permit is issued to a person for an activity they propose to carry out that would otherwise be prohibited. If the permit is issued to another person, such as the Northern Territory Cattlemen's Association (NTCA) it does not give the first person protection from liability of committing an offence.

In legislation a "person" means both a natural person and a body corporate. It is not clear in the Draft Plan what persons are proposed to be granted the "industry wide permit" for pastoral land.

An "industry wide permit" does not appear consistent with the framework for issuing permits established under the Weeds Management Act. See Appendix 1 for discussion of this framework and how a permit protects a person from non compliance with a duty under the Weeds Management Act. A natural person or a body corporate must be the applicant under section 28F of the Weeds Management Act, to then obtain the permit to use the declared weed for conduct specified in section 9E(2) of the Act.

It is understood the proposal is that the industry wide permit would be held by the Northern Territory Cattleman's Association (NTCA). The NTCA is an association registered in the NT. Associations have body corporate status. However, the NTCA does not appear to be the person that would carry out conduct specified in section 9E(2) of the Act.

Appendix A of the Draft Plan describes the following intention: *"To allow for continued pastoral use, the Minister for Lands, Planning and Environment (the Minister), upon receipt of an application, can grant an industry wide permit to Crown land subject to pastoral lease under the Pastoral Land Act 1992 to be exempt from these requirements."*

If this is indeed an attempt to grant a permit for all land subject to a pastoral lease under the *Pastoral Land Act 1992* without issuing permits to each person who holds a pastoral lease it appears unlikely to succeed. The permit is for specified prohibited conduct and is granted to a person to carry out that conduct.

The language in the table in Appendix A is misleading as to the nature of permits under the Act. In column 4 under the heading "Allowance for Pastoral Use" the Table states for certain conduct prohibited by section 9E(2) of the Act that it is "To be allowed under pastoral use permit, to be issued by the Minister for land administered under the *Pastoral Land Act 1992*". This language does not reflect how under the Act there is no 'pastoral use permit'. Prohibited conduct, even if authorised under the *Pastoral Land Act 1992,* would still require a permit under the Weeds Management Act. Otherwise it would be a failure to comply with the duty to not engage in prohibited conduct.

Recommendations

- ***I object to the proposed industry-wide permit. All land uses, including pastoral uses, should be subject to individual permits in accordance with the Weeds Management Act 2001.***
- ***More information on the proposed industry-wide permit should have been available at the time of this plan being drafted.***
- ***Legal questions around the operation of the proposed industrywide permit need to be publicly addressed.***

2.4.4 Legality of not extending the Reasonable Measures relevant to the Weeds Management Act to pastoral leases

I object to the proposal in the Draft Plan to define 'reasonable measures' for pastoral lands differently to other land tenures by seeking to define reasonable measures based upon Pastoral Lands Act and bypass the Weeds Management Act

The Draft Plan seeks to give an interpretation for pastoral land that is potentially inconsistent with the duties in the Weeds Management Act. The Draft Plan does not have power to modify the requirements of the Weeds Management Act.

The Draft Plan attempts to define 'reasonable measures' in a particular way for pastoral land and in a different way for other land. This will be an issue for pastoral land because the Weeds Management Act requires pastoral land occupiers, along with all land owners and occupiers, to "take all reasonable measures to prevent the spread of a declared Weed".

The attempt to define reasonable measures to mean something that does not prevent spread (and may include planting), by saying that "'reasonable measures' for pastoral land is defined as use in accordance with the relevant objectives of the Pastoral Land Act 1992", is not supported by the Weeds Management Act.

It is likely to contradict the action required to comply with the duty provision and would not promote the purpose of the Act.

The Weeds Management Act does not contemplate a different meaning of 'reasonable measures' being defined by a weed management plan in this way. Even if it did, the proposed definition of 'reasonable measures' for pastoral land is so vague that it lacks meaning. It is not apparent how a person would determine which are the 'relevant objectives' of the Pastoral Land Act 1992 that define reasonable measures for the purposes of the Weeds Management Act. Secondly, on a common-sense approach to interpretation of section 9K of the Weeds Management Act this approach appears to conflict with that provision in that it requires reasonable measures to reduce the spread of declared weeds.

The term 'reasonable measures' must be understood in relation to the purpose reasonable measures are required for: to reduce the spread of declared weed on the land.

These issues are highly consequential. The Pastoral Land Act 1992 has led to the establishment of buffel grass and has not managed buffel grass on country or stopped buffel grass transgressions from Pastoral Leases. Public reporting of land condition on the pastoral estate does not report extent of buffel, occurrence of listed weeds, the health and occurrence of native species vulnerable to buffel grass invasion or the condition of EPBC listed species under threat from buffel grass invasion.

Recommendation:

- ***I object to the proposal in the Draft Plan to define 'reasonable measures' for pastoral lands differently to other land tenures by seeking to define reasonable measures based upon Pastoral Lands Act and bypass the Weeds Management Act***
- ***Reasonable measures as defined in the weed management plan, in accordance with the Weeds Management Act must apply to all land uses and on all land tenures.***

2.4.5 Length of permits and renewal of permits at plan renewal

I am concerned that if the weed management plan is reviewed and changes down the track, then a permit issued under the first iteration of the plan could allow outdated practices to continue for the duration of the permit. To address this the plan should include a statement that any permits to be issued should be subject to periodic review and that permits are to be terminated and updated in accordance with the updated plan when this plan is updated.

Recommendation
A mechanism needs to be included in the Weed Management Plan to ensure permits are terminated and updated upon revision of this plan.

2.4.6 Failure to modify planting advice after weed declaration

It is concerning that to this day the planting advice Agnote No: E28 August 2010 Buffel Grass (A pasture grass for sandy soils) has not been changed to reflect that buffel grass is a declared weed.
https://daf.nt.gov.au/publications/publications-search/publications-database/primary-industry/pasture/283.pdf

The failure of the relevant department to respect the change to legislation is inappropriate and concerning. Instead of educating buffel grass planters on the problems with buffel grass and pursuing other more sustainable grasses, maintaining this planting advice is undermining the reasons for the legislation.

I am also concerned that failure to update planting advice in a timely way leaves the public exposed to legal recourse from those who have planted buffel grass since the weed declaration, in good faith, based on this AgNote.

Recommendation
Planting advice Agnote No: E28 August 2010 Buffel Grass (A pasture grass for sandy soils) should have been removed when buffel grass was declared a weed. It must urgently be removed now.

2.5 Equity - This is an unfair, unbalanced and ultimately divisive plan.

This plan creates reasonable measures for most land tenures. However these measures are not extended pastoral leases, who perversely are allowed to keep spreading buffel grass.

Buffel grass, fires, air quality and seeds do not stay within the areas where buffel is planted or has become established.

This means the efforts in the areas where reasonable measures are required will be jeopardised and people taking buffel grass management seriously will still suffer buffel grass invasion's worst impacts (e.g. fires, propagule pressure, pollen, smoke and decline in regional environments which make the Territory life great) despite their efforts.

This approach is not only inequitable, it is also demoralising (as it demands effort that is compromised by poor practice elsewhere) and socially divisive.

It also represents substantial shifting of costs. One group, pastoral lease holders, perceive themselves to be gaining a benefit from spreading buffel and not having to undertake reasonable measures, while other groups are burdened by the reasonable measures and still suffering buffel invasion impacts. Please also refer to section 2.5.3 (impactor pays).

Recommendation
The plan makes unfair concessions to pastoral lease holders, this unequally distributes the burden of effort required under the plan, jeopardises plan effectiveness and is ultimately socially divisive.

2.6 Economic considerations

2.6.1 Lack of economic evaluation (and social impact assessment)

This plan appears to be based upon unsubstantiated assumptions about the economic benefit of buffel grass to the pastoral industry when compared to the costs of buffel invasion. To anyone living in Central Australia this is hard to fathom. Buffel's impacts are ubiquitous and its costs are enormous! It is ridiculous to think that the pastoral sector's contribution (4% of the GDP) cannot compensate for the economic, social and environmental costs

These costs include:

- lost earnings for sectors such as Tourism, Arts and Health
- costs associated with ecosystem decline
- Reduced social amenity
- costs of ongoing buffel management activities compared to addressing the root causes
- Firefighting costs
- Opportunities costs such as
    - Securing federal investment in native species
    - threats to carbon sequestration due to inadequate regulation of buffel and fire/ buffel invasion risks
    - Employment opportunities for buffel management
- Risks to investments in buffel management activities in conservation areas, aboriginal lands trusts and opportunities for attracting federal support to protect ecosystems

Furthermore there are equity consideration

- It does not consider equity and who benefits versus who pays. For example in the 76,487 Aboriginal people live in the NT, 74.6% of who live in remote or very remote areas and presumably by large suffer negative impacts from buffel grass invasion. By comparison Agriculture, Forestry and Fishing employs only 383 FTEs (2% of all jobs) and 4% of our economy. Realistically it does not offer a pathway forward for significant employment of those sectors needing jobs or economic prosperity.

2.6.2 Impactor Pays Funding models
Equitable funding models need to be agreed. While some of the impacts of buffel are legally and morally unacceptable (e.g. species and ecosystem extinctions and damage to sacred sites) if this plan seeks to minimise the costs to the pastoral industry, and place a greater burden on the rest of us then this needs to be done on a cost recovery (impactor pays basis)

Recommendation

- ***Charles Darwin University economic analysis will provide crucial data that is required before the draft plan can be prepared and the public can make informed commentary. The plan should be delayed until this study is complete and to take into account its findings.***
- ***The scope of works for the economic analysis should be sufficiently broad to take into account the many impacted sectors, equity and 'non monetised' costs of buffel grass invasion. It should be publicly available.***
- ***What is the cost of this plan and its impacts should be modelled and compared to a stronger plan that manages buffel and reported via the proposed 'statement of effect'.***
- ***An impactor pays model should apply for any planting or deliberate spread of buffel.***

Figure Value added by industry sector and employment data - Central Australia

Current area: Central Australia | Current benchmark: Northern Territory | Comparison year: 2018/19 | reset

Value added by industry sector

reset export

Central Australia	2023/24			2018/19			Change
Industry	$m	%	Northern Territory	$m	%	Northern Territory	2018/19 - 2023/24
Agriculture, Forestry and Fishing	126.3	3.8	4.5	80.3	2.8	4.0	+46.1
Mining	553.2	16.8	34.0	560.6	19.4	29.6	-7.4
Manufacturing	87.9	2.7	2.6	78.1	2.7	4.9	+9.8
Electricity, Gas, Water and Waste Services	52.6	1.6	1.6	39.6	1.4	1.7	+13.0
Construction	117.4	3.6	6.6	142.9	5.0	7.3	-25.5
Wholesale Trade	107.8	3.3	2.9	81.3	2.8	3.4	+26.4
Retail Trade	122.9	3.7	3.1	121.9	4.2	3.1	+1.0
Accommodation and Food Services	149.4	4.5	2.4	139.1	4.8	2.7	+10.2
Transport, Postal and Warehousing	192.5	5.9	4.4	152.0	5.3	4.8	+40.5
Information Media and Telecommunications	18.1	0.6	0.4	17.8	0.6	0.4	+0.3
Financial and Insurance Services	67.0	2.0	2.5	57.1	2.0	2.5	+9.9
Rental, Hiring and Real Estate Services	43.9	1.3	1.4	48.8	1.7	1.5	-4.9
Professional, Scientific and Technical Services	140.3	4.3	3.0	141.4	4.9	4.6	-1.2
Administrative and Support Services	70.9	2.2	2.1	75.2	2.6	1.9	-4.3
Public Administration and Safety	409.0	12.5	10.8	355.7	12.3	11.6	+53.2
Education and Training	206.1	6.3	5.2	206.8	7.2	5.2	-0.7
Health Care and Social Assistance	683.2	20.8	9.1	468.2	16.2	7.8	+215.0
Arts and Recreation Services	48.9	1.5	1.3	46.7	1.6	1.2	+2.3
Other Services	86.3	2.6	2.0	72.3	2.5	1.9	+14.0
Total industries	3,283.7	100.0	100.0	2,885.9	100.0	100.0	+397.8

Source: National Institute of Economic and Industry Research (NIEIR) ©2025. Compiled and presented in economy.id by .id (informed decisions). Note: All $ values are expressed

Current area: Central Australia | Current benchmark: Northern Territory | Comparison year: 2018/19 | reset

Full-time equivalent employment by industry sector

reset export

Central Australia	2023/24			2018/19			Change
Industry	Number	%	Northern Territory	Number	%	Northern Territory	2018/19 - 2023/24
Agriculture, Forestry and Fishing	383	2.0	2.7	327	1.7	2.4	+56
Mining	1,473	7.6	5.9	994	5.3	4.9	+479
Manufacturing	329	1.7	2.7	336	1.8	3.3	-7
Electricity, Gas, Water and Waste Services	271	1.4	1.9	234	1.2	1.9	+37
Construction	1,094	5.7	8.9	1,631	8.6	10.1	-537
Wholesale Trade	252	1.3	1.7	259	1.4	2.2	-7
Retail Trade	1,088	5.6	6.0	1,371	7.3	6.7	-282
Accommodation and Food Services	1,208	6.3	5.6	1,425	7.5	6.1	-217
Transport, Postal and Warehousing	783	4.1	4.7	787	4.2	4.9	-4
Information Media and Telecommunications	194	1.0	1.0	304	1.6	1.2	-110
Financial and Insurance Services	93	0.5	1.0	100	0.5	1.0	-8
Rental, Hiring and Real Estate Services	177	0.9	1.4	245	1.3	1.6	-68
Professional, Scientific and Technical Services	1,101	5.7	5.9	722	3.8	5.1	+379
Administrative and Support Services	365	1.9	2.8	647	3.4	3.5	-282
Public Administration and Safety	2,952	15.3	16.4	2,915	15.4	16.7	+37
Education and Training	1,622	8.4	9.3	1,576	8.3	7.9	+46
Health Care and Social Assistance	4,415	22.9	15.3	3,449	18.2	12.6	+966
Arts and Recreation Services	658	3.4	2.7	626	3.3	2.9	+31
Other Services	804	4.2	4.2	950	5.0	4.8	-146
Total industries	19,263	100.0	100.0	18,900	100.0	100.0	+363

Source: National Institute of Economic and Industry Research (NIEIR) ©2025. Compiled and presented in economy.id by .id (informed decisions). NIEIR-ID data are adjusted

2.7. Governance Shortcomings

Throughout I have highlighted that this plan lacks balance, will not work and remarkably, seeks puts the Pastoral Industry outside of many of the responsibilities of the weed gazettal and the Weeds Management Act 2001. It is reported that the version of the draft plan put out for comment is a minority version [17][18] . This is a red flag that the Buffel Grass Weed Advisory Committee is not functioning in a way that is consistent with the public interest.

The reasons for the are:

1. Lack of transparency - the WAC stopped publishing its minutes and now publishes only vague communiques. This is especially problematic given the make-up of the committee and inclusion of industry interests who are on record as remaining antagonistic to buffel grass weed management.
2. Lack of balance and expertise
    a. First Nations people are most profoundly impacted by buffel grass invasion but there is only one Aboriginal person on the committee. Not even all genders are represented.
    b. There is a distinct lack of independent scientific, weed management and policy expertise and representation on the committee
    c. Adversely impacted industries like tourism and sectors like health and environment are not represented by the recognised authorities or experts.
3. Lacks commitment to effective buffel grass weed management
    a. The largest cohort on the committee (pastoral industry) perceives a material benefit from avoiding buffel grass management responsibilities.

[17] https://nt.gov.au/__data/assets/pdf_file/0004/1573780/buffel-wac-communique-november-2025.pdf
[18] https://www.alec.org.au/25_mr_draftbuffelwmp

b. The group's participation seems to have been disingenuous with recent statements confirming the industry will continue to push for buffel's grass's weed classification to be overturned.[19]

Recommendations

- ***The Buffel Grass Weed Advisory Committee needs to be representative. This includes:***
  - ***Greater First Nations representation including representatives from different regions and genders***
  - ***Environmental interests***
  - ***Businesses adversely impacted by buffel and those which could contribute positively to the buffel grass weed response***
  - ***Expertise in policy and weed management planning***
- ***Committee members with a pecuniary interest that is not aligned with weed management declaration should be observers and not have voting status. (2.7)***
- ***The Committee should publish its minutes in full, to normal minute taking standards. (2.7)***

2.8 Consultation and engagement approach

I am greatly concerned that that engagement leading up to the release of this draft plan did not engage proportionally with the people most impacted in a timely way or with suitable information and resources. In particular I refer to the many thousands of Aboriginal people living in communities and Alice Springs Town members who are adversely impacted but may not prioritise responding to a survey.

The Department has been very passive in its communications around the Buffel Grass weed declaration. Its communication of the risks have not been proportional to the scale of the threat. It feels like it has been left to individuals and volunteer groups. For example NT Parks have no information materials about buffel grass, there are no signs about buffel weed declaration responsibilities.

(I raised issues in my previous submission https://www.lettersfortheenvironment.com/wp-content/uploads/2025/07/Part-2-Submission-on-the-Buffel-Grass-Management-Have-Your-Say.pdf)

Furthermore release of the plan was not announced and timing over summer is terrible. I have been deeply engaged with this process but was not aware that the draft plan was to be released over the summer period. I had been under the impression that the draft was waiting upon receipt of the Charles Darwin University economic evaluation before it could be finalised.

Finally the consultation demands high digital literacy and awareness and engagement in NT Government processes. Even the questions in the survey demanded a thorough reading of the draft Weed Management Plan to be able to participate. This was a barrier to groups with immense expertise and concern having their say. Undoubtedly feedback could have been obtained on the plan settings via different approaches.

I am also concerned that the Department has not been forthcoming in fostering community dialogue on buffel grass management.

- It failed to release a summary of the feedback on the previous have your say, leaving us in the dark as to what feedback has been received and how this draft plan aligns with it

[19] https://www.abc.net.au/listen/programs/nt-country-hour/nt-country-hour/106313594

- It also did not organise and declined Alice Springs Town Council's offer to support a Town Meeting.

This has significantly diminished the opportunity for an informed debate and community consent.

I was told there was reluctance toward such a meeting as proposed by ASTC as it would result in a 'slanging match'. This feels very disrespectful towards the Central Australian community and also tacit acknowledgement of the shortcomings of the plan.

Recommendations

- **The results of the previous Have Your Say should have been available when this draft was released to enable assessment of how this draft aligns to community expectations. It needs to be released urgently and certainly well before the Buffel Grass Weed Management Plan is finalised.**
- **The shortcomings of consultation need to be acknowledged and the implications of this to the feedback received recognised. Effective strategies to provide information and valid approaches to determine the opinions of groups with a stake in buffel grass management outcomes undertaken prior to finalisation of the plans**
- **An improved draft plan needs to be resubmitted for public consultation.**

Other

1. Request my other submission be considered previous submission https://www.lettersfortheenvironment.com/wp-content/uploads/2025/07/Letter-Have-Your-Say-Buffel-Grass-Management-Part-1.docx-3-4.pdf

PART 3 CONCERNS & SUGGESTIONS ON DRAFT WEED MANAGEMENT PLAN TEXT

Note: My comments elsewhere in this submission also pertain to the text and if adopted would also require text changes. This table is therefore not a line by line critique of plan text - it just raises some of the greatest concerns. Please read this table in conjunction with my comments elsewhere in this submission.

Reference	***Issue***	***Comment***	***Recommendation***
	Relationship to wider Buffel grass Management	The Buffel Grass Management Strategy: Central Australia 2024 – 2030 (the Strategy) was prepared without opportunity for public comment. The first opportunity for public input on the approach to buffel grass weed management since it was declared a weed was the Have Your Say survey in early 2025. In that survey I and other raised concerns and emphasised for the need for a Territory wide approach that applied to all land tenures across Territory and raised concerns pertaining to the objectives and statements in the Strategy (e.g. objectives for pastoral lands management aren't strong enough, efforts need to be territory wide, disagreement with statements in section 5.2.4) The results and response to the previous Have Your Say have not been published. So effectively by linking this plan to the Buffel Grass Weed Management Strategy, only those people who have been on the Technical Working Group or Weed Advisory Committee have had a say.	I object to the draft plan referencing management documents that have not been subject to public review.
Chapter 2	Governance	Refer comments and recommendations in 2.7	Refer comments and recommendations in 2.7
Chapter 3	Scope	Refer comments on section 5.0	This plan should apply throughout the Territory
Chapter 4	Lacks Aims and Goals	This draft plan should align with the Gamba Grass Weed Management Plan which clearly defines the aim of the plan	Define Aims and Goals in the plan.

Reference	*Issue*	*Comment*	*Recommendation*
		and sets clearly articulated goals. These are necessary for a purposeful plan will ensure efficiency and efficacy of investments, Clarity of purpose would be well served by declaring the purpose for weed management under 7 (4) of the Weeds Management Act 2001	To assist these should be guided by declaring the purpose for weed management under 7 (4) of the Weeds Management Act 2001.
	General objectives	Statement about value to pastoral industry in 4.1 is not supported by evidence and should be removed	The economic evaluation needs to be completed before this draft can be completed. Statement about value to pastoral industry is not supported by any evidence an at face value statement is incorrect when compared to the costs of buffel grass invasion (refer my comments in section 2.6) This statement is unsound and must not be used as justification for planting and spreading buffel grass and diverting from normal weed management approaches.
	map	This map is wrong and unsuitable. While the draft WAP notes that the map is a significant underestimation, it is already being misused to diminish the extent of buffel grass invasion on pastoral leases (evidence available on request). The lack of data on buffel grass invasion on pastoral leases should not be 'weaponised' to claim buffel is better managed on pastoral leases.	The map should be updated before the plan is finalised. The responsibility described 5.3.2 *"Notify the Weed Management Branch of the presence of buffel grass in areas where Figure 1, defined by the 50km grid squares, indicates that buffel grass is absent, has been eradicated or where the distribution is unknown, within 14 days after first becoming aware*" should apply on all land tenures including pastoral leases.

Reference	*Issue*	*Comment*	*Recommendation*
4.2	Specific Objectives of the Plan	The only tangible weed management focus is 'protecting priority environmental and cultural assets'. This is insufficient - refer to my comments in 2.2.2 of the previous section. This plan needs to be strategically focused on stopping the spread of buffel (including planting) and establish zones for eradication and management using best management approaches as described in the NTG's own guidance documents. https://environment.nt.gov.au/media/docs/rangelands/weed-management-publications/preventing-weed-spread.pdf	I object to the only tangible weed management focus being protecting priority environmental and cultural assets. This is insufficient - refer to my comments in 2.2.2 of previous section. This plan needs to strategically focused on stopping the spread of buffel (including planting) and establish zones for eradication and management using best management approaches as described in the NTG's own guidance documents. https://environment.nt.gov.au/media/docs/rangelands/weed-management-publications/preventing-weed-spread.pdf
Chapter 5			1. The "management requirements" should apply to the entire Northern Territory, not just "Central Australia" Buffel grass has been identified as a sleeper weed in the Top End[20]. Furthermore requirements need to be Territory-wide to be effective. In the Katherine and Darwin Weed Management Regions as a Class A weed (requiring eradication) to prioritise early intervention In the Central Australian and Alice Springs and Tennant Creek Weed Management Regions, buffel grass should be managed as a class A weed, where it is yet to establish/localised or a priority for eradication and class B in areas where buffel is established.

[20] -https://www.ecnt.org.au/the_state_and_future_of_the_northern_territory_s_savannas_full_report

Reference	*Issue*	*Comment*	*Recommendation*
			This approach will facilitate early intervention, which is the most efficient and effective approach to weed management 2. **<u>Lack of</u>** management requirements on pastoral leases is unfair. I do not support the allowances for pastoral uses (refer below and section 2)
4.3	Priority Areas	This is too narrow. Refer my comments about protecting conservation areas throughout, including pastoral areas and the need for proper strategy prioritising eradication where possible and certainly not further planting	This is too narrow. Refer my comments about protecting conservation areas throughout, including on pastoral leases and the need for proper strategy prioritising eradication where possible and certainly not further planting
5.1	Conservation areas	Conservation areas should be protected from buffel invasions anywhere in the Territory.	Conservation areas: All areas identified as being of International or National Conservation significance in the Buffel Grass Management Strategy: central Australia 2024 -2030 should be included in the "Conservation Areas" category in the Buffel Grass Weed Management Plan and managed to prevent weed planting and spread. This plan, which would allow the introduction of a declared weed into or adjacent to sites of conservation significance, risks significant and irreversible harm to ecological communities and species. This draft plan should be referred as a Strategic Proposal, as defined in S13 of the Environmental Protection Act 2019, to the NTEPA for environmental impact assessment.

Reference	*Issue*	*Comment*	*Recommendation*
			The responsibilities for persons should apply in "conservation areas" throughout the NT not just in "Central Australia"
5.2	Transport corridors		The responsibilities for persons should apply in "conservation areas" throughout the NT not just in "Central Australia"
5.3	Management Requirements all Land Tenures		The responsibilities for persons should apply in "conservation areas" throughout the NT not just in "Central Australia"
Section 5.3.2.1	Reasonable measures to prevent spread on own land	I object to the statement and idea that "under this plan 'reasonable measures for pastoral land is defined as use in accordance with relevant objectives of the Pastoral Land Act 1992' The reasonable measures on non-pastoral land detailed in this section should apply to pastoral land also. The objects of the Pastoral Lands Act do not align with those in the Weeds Management Act (refer discussion in) This appears to be overreach The responsibilities for weed management for owners and occupiers for other weeds like gamba grass are defined in the Weed Management Plan.	These should apply on all land tenures including pastoral land. These measures should apply Territory Wide.
5.3.1	Appendix A	I object to 'the allowance for Pastoral Use' in Appendix A and statement, "to allow for continued pastoral use, the Minister for Lands, Planning and Environment (the Minister),	Remove allowances for pastoral industry

Reference	*Issue*	*Comment*	*Recommendation*
		upon receipt of an application, can grant an industry wide permit to Crown land subject to pastoral lease under the Pastoral Land Act 1992 to be exempt from these requirements." Higher risk activities on all land tenures, across the Territory should be treated equally. They require individual permits issued under the section 9E of the Weeds Management Act 2001.	
	Table Appendix A	I am opposed to a 'pastoral use permit' to be administered under the Pastoral Lands Act 1992.	I object to an "industry wide permit" for pastoral leases. Remove <u>all</u> the allowances for pastoral use described in Appendix A of the draft Plan and remove this column. Any permits should be on a case specific basis for ALL land tenures High risk activities on all land tenures, across the Territory should be treated equally under the same laws. They require individual permits issued under the section 9E of the Weeds Management Act 2001.
	Table Appendix A	Statement column 2 'The scattering of buffel grass, with seed sourced from within the same weed management region by owners/occupiers within land parcels used for the purposes of pastoral production, as long as use is in accordance with the objectives of the Pastoral Land Act1992 and the size does not exceed 1 ha'	This is not a low risk activity. It should be subject to permitting. Reference to the objectives of the *Pastoral Land Act 1992* is inappropriate for a Weed Management Plan and should be removed as per previous comments.

Reference	*Issue*	*Comment*	*Recommendation*
	Table Appendix A	Statement column 2 'Hire of equipment containing buffel grass within the Alice Springs Town Council Area or within 10 kms of Tennant Creek.'	This is not a low risk activity and is poor practice. It should be removed.
5.3.2.2	Reasonable measures to prevent spread of buffel grass onto adjoining land	I object to the statement: *"Note: Burning, grading, slashing and grazing management methods do not destroy buffel grass. <u>These methods can be useful for managing buffel grass fuel loads and minimising seed production.</u> To destroy buffel grass, these methods must be implemented in conjunction with other control methods, such as herbicide application and hand pulling."* It is well established that buffel grass benefits from fire and fire at any time of the year is leading ecosystem transformation and degradation[21]. Similarly industry best practice advice highlights buffel grass benefits from grazing, including aiding buffel grass seed production. Grazing also has many other adverse environmental impacts. I am concerned that this statement could be misused by pastoral leaseholders to require cattle to be accepted into neighbouring parks and Aboriginal Lands under the guise of this being an accepted method to reduce fuel loads. This risk is major given that under the plan buffel grass will inevitably move from pastoral leases to neighbouring land tenures. Further information - problems with Grazing. Please see attached presentation: <u>https://www.lettersfortheenvironment.com/wp-content/upl</u>	***Recommendation:*** Remove the sentence 'These methods can be useful for managing buffel grass fuel loads and minimising seed production.'

[21] https://theconversation.com/the-buffel-kerfuffle-how-one-species-quietly-destroys-native-wildlife-and-cultural-sites-in-arid-australia-149456

Reference	*Issue*	*Comment*	*Recommendation*
		oads/2026/02/Grazing-to-manage-buffel-grass-invasion-review.pdf This concludes cattle and grazing are not an effective form of buffel grass management. Grazing is also a major threat to biodiversity NRMaps highlights biodiversity is concentrated in conservation areas and IPAs, not areas grazed and certainly not grazed buffel. Environmental Impacts of grazing ● Damage to wetlands, waterways, streams and water quality ● Impacts on soils ● Impacts on vegetation ● Biodiversity decline ● Spread of other weeds Furthermore it finds grazing helps buffel grass. Best practice advice promotes regular grazing/slashing as: ● To increase buffel seed production ● Decreases its vulnerability to pests, diseases and rundown ● Livestock help spread buffel seed ● Grazing increases soil disturbance which increases chances of buffel seed germination	
Chapter 7	Buffel Grass Compliance Approach	Education and Assistance Program **Pastoral Leaseholders** need to be included in the education section, comments from David Driver, Elkedra Pastoral Company.[22] demonstrate do not suggest any awareness of the implications of their activities on their neighbours:	Pastoral Leaseholders, Bushfires NT and any individuals involved in fire management and response need to be included in the education section. This needs to be mandatory.

[22] https://www.abc.net.au/listen/programs/nt-country-hour/nt-country-hour/106313594

Reference	*Issue*	*Comment*	*Recommendation*
		"It's really up to the other land managers in the NT to get on top of how they want to manage their land. We're not going to venture into that part, because we're not about telling other people what to do but we manage our land very well and we manage buffel grass well." Bushfires NT and any individuals involved in fire management and response need to be included in Education and programs.	
Monitoring and Evaluation	Ensure owners and occupiers of land are aware of their legal obligations to manage buffel grass under this Plan and the Act.	Communications Plan should be a Communications and Engagement plan and include awareness raising and education about buffel grass impacts, not just legal obligations. It should be in place prior to plan gazettal. Planting advice Agnote No: E28 August 2010 Buffel Grass (A pasture grass for sandy soils) should have been removed when buffel grass was declared a weed and most urgently be removed now	Communications Plan should be a Communications and Engagement plan. It should include awareness raising and education about buffel grass impacts, not just legal obligations. Planting advice Agnote No: E28 August 2010 Buffel Grass (A pasture grass for sandy soils) must urgently be removed.
	Implement transparent and accountable compliance, monitoring and reporting processes.	There is not enough information and a lack of transparency around how much buffel grass is being spread and what varieties	Any permits or permissions allowing the planting of buffel grass under a permit, or the proposed industrywide permit which I strongly objected to, need to be on the public record, reporting at the property scale, details including how much, what varieties and what parts of the property buffel is being planted or spread on.

Appendix 1 - operation of permits

Part 6A of the Weeds Management Act deals with permits to use declared weeds or potential weeds in a manner that would otherwise be prohibited by the Weeds Management Act.

For a declared weed such as buffel grass, a permit may be sought from the Minister by "a person" who applies to use "a declared weed for conduct specified in section 9E(2)" of the Weeds Management Act.

Section 9E(2) of the Weeds Management Act sets out what a person has a duty not to do in relation to declared weeds, except in accordance with a permit. This is separate to the duty in section 9E(1) of the Weeds Management Act to "comply with a weed management plan for a declared weed".

The Minister grants or refuses to grant an application for a permit. The Minister can impose any conditions on the grant of a permit that "the Minister considers appropriate".

It is an offence against the Weeds Management Act to fail to comply with a permit.
Section 9E(2) of the Weeds Management Act is set out below.

> *"(2) Except in accordance with a permit, a person has a duty to not do any of the following:*
> *(a) bring, or be responsible for bringing, a declared weed into the Territory; (b) propagate or scatter a declared weed;*
> *(c) sell, offer to sell or provide a declared weed or any thing that contains or carries a declared weed;*
> *(d) purchase or offer to purchase a declared weed or any thing that contains or carries a declared weed;*
> *(e) hire or offer for hire to another person any equipment, device or any other thing that contains a declared weed;*
> *(f) hire or request to hire from another person any equipment, device or any other thing that contains a declared weed;*
> *(g) store, grow or use a declared weed or any thing that contains or carries a declared weed;*
> *(h) subject to this section, transport or carry a declared weed or any thing that contains or carries a declared weed."* (emphasis added)

This duty has a corresponding offence that may be enforced against a person if they are alleged to engage in the specified conduct without a permit.[14] The relevant physical conduct of the offence is:

> *"(a) the person intentionally does any of the following:*
> *(i) brings a plant into the Territory;*
> *(ii) propagates or scatters a plant;*
> *(iii) sells, offers to sell or provides a plant or any thing that contains or carries a plant;*
> *(iv) purchases or offers to purchase a plant or any thing that contains or carries a plant;*
> *(v) hires or offers to hire to another person any equipment, device or any other thing that contains or carries a plant;*
> *(vi) hires or requests to hire from another person any equipment, device or any other thing that contains or carries a plant;*

(vii) stores, grows or uses a plant or thing that contains or carries a plant; (viii) transports or carries on their person a plant or any thing that contains or carries a plant;…"[15]

The absence of a permit to engage in the conduct is an element of the offence. Proving the offence does not require the person's knowledge of the requirement to hold a weed management permit.

Framework for permits to be granted

45. The relationship between permits, the Draft Plan and the requirements of section 9E(2) of the Weeds Management Act may also complicate the Plan's implementation. Only a permit can authorise a person to engage in the conduct specified in section 9E(2) of the Weeds Management Act with a declared weed. Engaging in this conduct without a permit is conduct capable of constituting an offence against section 9F(1) of the Weeds Management Act. It appears that the Draft Plan is intended to provide the framework for issuing permits for this conduct.[37]
46. This approach runs up against the limitations of the permit only being able to be issued in accordance with the Weeds Management Act, specifically section 28F of the Act. The Draft Plan can explain the intended operation of permits and outline how applications will be processed and decided but cannot be used to change when a permit is required: that is set out in section 9E(2) of the Weeds Management Act.
47. For the permit to authorise conduct otherwise prohibited by the Weeds Management Act, it must be held by the person carrying out the conduct. This is clear from the language of the offence provision in the Act (reproduced below).

    "*A <u>person</u> commits an offence if:*
    (a) <u>the person</u> intentionally does any of the following:
    …
    (c) <u>the person</u> does not have a permit to use the declared weed for the conduct specified in paragraph (a)."[38] (emphasis added)

48. This is mirrored in the language for the application for a permit:

    "*(1) A <u>person</u> may apply to the Minister for a permit <u>to use</u>:*
    (a) a declared weed <u>for conduct specified in section 9E(2); or</u>"[39] (emphasis added)

49. A pastoral lease holder who will carry out prohibited conduct must obtain a permit to avoid non-compliance with their duties and potentially the offence in the Act.