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Nature Conservation Saves for Tomorrow

11 November 2025

Dr Rosemary Dillon
Chief Executive Officer
Blue Mountains City Council
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KATOMBA NSW 2780
Email: council@bmcc.nsw.gov.au

Dear Dr Dillon,

Submission: BMCC Draft Weed Management Strategy 2025-2030

I am writing to you on behalf of the Blue Mountains Conservation Society (The Society). The Society is comprised of over 900 members and seeks to protect, conserve and advocate for the natural environment of the Greater Blue Mountains.

The Society wishes to make a submission on the *BMCC Draft Weed Management Strategy 2025-2030*.

Background

The Society's view is that effective management of environmental weeds in the Blue Mountains is an exceptionally important issue. The spread of weeds poses an ongoing threat to the ecological health of our bushland reserves, local streams, Blue Mountains National Park and the Greater Blue Mountains World Heritage Area (GBMWA). The Society is concerned that the problem may be worsening.

Effective weed management is essential to sustaining the natural capital that underpins the Blue Mountains' identity and tourism economy. Invasive weeds threaten the biodiversity, water quality and aesthetic character of the bushland, waterways and ecological integrity—elements that are central to both resident and visitor experience in the region. The Weed Management Strategy 2025-30 therefore is an important contributor to the ecological foundation upon which the Destination Stewardship Management Plan depends, by safeguarding biodiversity and ecological resilience and by promoting environmental values that underpin both community engagement and tourism.

The Society congratulates BMCC and its environmental managers, officers and field staff, and associated Natural Area Volunteer Program bushcarers and landcarers on their many excellent achievements regarding the management of environmental weeds in the Blue Mountains (*2019 Implementation Plan Review*).

The Society notes that BMCC operates on a relatively small budget, manages a large urban area featuring extensive bushland interface, and that given the magnitude of the environmental weed problem in Australia, state and federal financial allocations to weed management grants and programs are inadequate.

Submission

1. Overall, the Society commends *BMCC Draft Weed Management Strategy 2025-2030*. The Society's view is that the Strategy can be further enhanced.

2. The Society strongly agrees that a long-term strategic, planned approach to environmental weed management should be adopted, rather than an ad hoc, reactive approach (*Action Plan 2025-30*).

3. Accordingly, it is important that the community understands the Action Plan 2025-30 strategic approach. The Society recommends that community weed education should explain how the strategic approach works, and its benefits, and that this should be itemised in Action Plan 2025-30.

Recommendation: *Action Plan 2025-30/ CAPACITY BUILDING / LOCAL ACTION a) Deliver two biosecurity awareness raising campaigns. Explain to community BMCC strategic approach to environmental weed management (p.76).*

4. To conform to *Objectives* (p.15), the Society suggests that at *Strategic Approach/Goals* (p.15) goal #3 be amended to 3. *Effectively manage land to reduce the impact of widespread invasive weeds on key natural area assets and where applicable, other assets.*

5. The Society strongly supports the diverse range of environmental weed management programs developed by BMCC and community advocates to address the weeds management issue across a range of conservation landscapes: Priority Weeds Inspection Program, Natural Areas Management Program, Urban Weeds Program, Creekline Restoration Program, High Risk Pathway Surveillance Program, the Natural Area Condition Mapping Program, Natural Area Volunteer Program and the Bushland Accreditation Nursery Program.

6. The Society strongly supports the incorporation of Indigenous Australian Traditional Ecological Knowledge into mainstream weed management strategies and techniques.

7. The Society highly commends a strategic approach that includes weed inspections in priority focus areas but recommends that inspections of properties be dramatically increased.

There is no doubt that there is a need to considerably increase the number of properties inspected annually and reduce the interval between inspections. Only approximately 4% of Blue Mountains properties are inspected annually for weeds. Convincing anecdotal evidence presented to the Society strongly suggests that a large proportion of all Blue Mountains properties exhibit substantial numbers of Priority weeds. *Table 3/Priority Weeds Inspection Program* (p.39) strongly supports this proposition. The *Draft Weed Management Strategy 2025-2030* (p.37) explains and acknowledges the significant scale of the environmental weed management problem on private property and the threat that it poses to adjacent bushland.

The Society acknowledges that inspections involve considerable expense and suggests that over the period 2025-2030 the number of inspections be incrementally increased to 5000 per year by 2030, rather than be set at *>2000 private property inspections* (p.74). Property inspections conducted on a scale of 5000 per year will be far more effective at stemming weed infestation of bushland, Blue Mountains National Park and the GBMWhA, and in time it may be possible to reduce the number of inspections and the associated expenses, as Priority weed numbers and density decreases.

Recommendation: *Action Plan 2025-30 EFFECTIVE MANAGEMENT - ASSET PROTECTION/PERFORMANCE MEASURE/ 5000 private property inspections in priority areas by 2030* (P.74).

8. To implement recommendation #7 as above, the Society supports employment of additional environmental staff, including appropriate weed management field staff (to treat weed infested BMCC managed land adjacent to inspected properties and fulfil *mutual obligation* [p.37]) and Compliance Officers.

9. The Society's view is that given the extent of the environmental weed management problem and the need for more property inspections, the impacts of climate change and the devastating outcomes that may arise if weed management is inadequate including loss of indigenous flora and fauna species, risk of UNESCO delisting of the GBMWhA and resultant severe community and economic consequences, there is a need for adequate funding of *Action Plan 2025-30* (including proposals put forward in this submission).

If required, the Society supports increasing the proportion of the BMCC annual budget allocated to environmental weed management, to satisfactorily fund *Action Plan 2025-30* including 5000 property inspections annually by 2030. The Society is under the impression that current BMCC rates do not include any form of environmental levy and believes that introduction of an environmental levy component in rates is justified and would receive wide support from the community (https://www.bmcc.nsw.gov.au/sites/default/files/docs/2025-09-30_Enclosure_Item_5.pdf). The Society believes that a significant proportion of the income derived from the recently introduced urban parking fee program should be allocated to environmental weed management, as the local tourism economy benefits from weed management work. In principle, the Society supports any further efforts by

BMCC to recover costs associated with implementation of environmental measures that support the tourist economy, and allocation of these revenues to environmental works.

10. The Society's view is that BMCC should exhaust every opportunity to secure all available grant funding for *Action Plan 2025-30*.

Recommendation: *Action Plan 2025-2030/ Effective Management – Asset Protection/ PERFORMANCE MEASURE/ All available grants and partnership funding opportunities accessed when available and depending on staffing capacity to manage additional projects / administrative requirements.*

11. The Society's view is that BMCC should advocate at state and federal level and at LGNSW Annual Conference for dramatic increases in the level of funding devoted to weed management (funding of direct programs, grants).

12. The Society agrees that in the first instance, co-operation with landowners is a highly preferable approach to weed management. But application of appropriate compliance procedures, including financial penalties, is also an essential management tool, as many landowners will not remove environmental weeds from their property. The Society believes that there is considerable community support for appropriate BMCC use of compliance powers.

13. The Society's view is that BMCC must advocate at state level for an increase in the penalty amount payable following an infringement of Section 128 "Biosecurity Direction" or Section 133 "No Work Undertaken" of the *Biosecurity Act 2015* (NSW).

14. The Society and the general community are outraged by the failure of Transport NSW to adequately manage serious weed infestations within its railway corridor. Quite obviously, these weeds pose an environmental hazard to adjacent bushland and the GBMWhA. The failure of Transport NSW to adequately manage these weeds sets back work undertaken by BMCC and hundreds of NAVP volunteers. The Society has made extensive representations to Transport NSW and local state member of parliament, Hon. Trish Doyle MP, about this matter, and is aware that BMCC has also made representations to Transport NSW.

As part of its draft *Effective Management – Asset Protection/Action Plan 2025-2030* has BMCC considered issuing or has it issued Transport NSW with a Section 123 *Biosecurity Direction* and Section 128 *Individual Biosecurity Direction* under the *Biosecurity Act 2015* (NSW)? Has BMCC considered making representations or made representations to the Secretary, Department of Primary Industry and Resource Development (DPIRD), to initiate legal action against Transport NSW regarding Priority weed infestation within the Blue Mountains rail corridor as per Section 385 *Biosecurity Act 2015* (NSW)?

The Society acknowledges that although the financial penalties involved are small and there is a low likelihood of the Secretary commencing legal action against Transport NSW, initiation of these measures would indicate to the community the serious environmental consequences of poor weed management by Transport NSW and may

possibly shame Transport NSW into taking effective weed management action along the rail corridor. There is also the issue of equitable application of the *Biosecurity Act 2015* (NSW) by an LCA.

15. The Society's view is that BMCC should advocate at state level and at LGNSW Annual Conference for reform of the *Biosecurity Act 2015* (NSW) and particularly reform of its ineffectual and overly complex enforcement and prosecution procedures.

16. The Society supports BMCC commitment to *the need to address the causes of the problems not just the symptoms* (p.18). In particular, the Society believes that BMCC should advocate at state and federal level to secure better regulation of inter-state and intra-state online weed sales, as the Society believes that management of this form of weed distribution is poorly regulated by state and federal authorities, if at all. Anecdotal evidence presented to the Society strongly suggests that some online environmental weed sellers particularly target sale of declared weed species.

17. The Society strongly recommends that *inspection of markets and other plant sale outlets and aquatic plant suppliers such as pet stores* be added to *Action Plan 2025-30 Effective Management - Asset Protection/ Performance Measure/3.2 Promote responsible plant biosecurity practices to industry groups etc./* (p.75).

18. In principle, the Society supports the BMCC Blue Mountains Bushland Nursery Incentive program. However, the Society notes that the program is confined to the exclusion of Priority Weed sales by regional plant nurseries. The Society believes that there is scope to considerably improve the program, initially by including environmental weeds categorised as *Very High* risk (BMCC DCP 2015). Further categories could be added in the future. The Society notes that very few nurseries prominently display their BMCC accreditation certificate, suggesting that the program requires invigoration. Recommended: *Action Plan 2025-30/EFFECTIVE MANAGEMENT - ASSET PROTECTION/PERFORMANCE MEASURE/Refresh and continue expansion and implementation of Nursery Accreditation Scheme that encompasses state, regional and local priority weeds and environmental weeds rated as Very High risk* (p.75).

19. The Society notes that the three volunteer community native plant nurseries (Wildplant Rescue Nursery Katoomba, BMCS Plant Nursery Blackheath, Australian Plant Society Nursery Glenbrook) are not listed in the BMCC Blue Mountains Bushland Nursery Incentive program and trusts that they are eligible to apply. (BMCS declares ownership and financial interests in BMCS Plant Nursery Blackheath).

20. The Society strongly supports insertion of a dedicated BMCC "report the sale of priority weeds" (priority weed sales by garden nurseries, markets, online etc.) reporting facility and education program at *Action Plan 2025-2030 CAPACITY BUILDING /4.3 Improve public capacity to report weeds/PERFORMANCE MEASURE/Develop and promote a "report the sale of weeds" facility for public use* (p.77).

21. The Society's view is that the definition provided at p.18 *Environmental weeds may be defined as those introduced plants, both exotic and non-endemic native species,*

which have invaded natural ecosystems in the Blue Mountains is incorrect, that the term “non-endemic” should be deleted and the definition should be adjusted to *Environmental weeds may be defined as those plants introduced to the Blue Mountains (both exotic and Australian native species) that have invaded natural ecosystems in the Blue Mountains.*

22. The Society is concerned that some plant species exhibiting weed behaviour are not being listed promptly as Local Priority Weeds and therefore are not being appropriately managed and are not being notified to local nurseries participating in council’s local nursery bushland incentive accreditation scheme (NSW Weed Risk Management system; *Local Priority Weed list updated/Eradicate or Contain/Action Plan 2025-30*). For example, *Cordyline australis* is naturalised in the Blue Mountains (<https://plantnet.rbgsyd.nsw.gov.au/cgi-bin/NSWfl.pl?page=nswfl&lvl=sp&name=Cordyline~australis>), seed is widely distributed by birds, and specimens are numerous in urban fringe bushland at Katoomba, Blackheath and Lawson, but this plant is not listed as a Local Priority Weed. Recommend: *Action Plan 2025-30/ ERADICATE OR CONTAIN/LOCAL ACTION/c) Local Priority List updated.../PERFORMANCE MEASURE/Consult Catchment groups, Bushcare groups, and Urban Weeds Program managers (p.72).*

23. The Society’s view is that there is scope for BMCC to conduct a structured, annual workshop featuring BMCC weed management administrators/senior field workers and representatives of community volunteer groups, and conservation focused organisations. At the workshop staff updates on current environmental weed field work across the Mountains and community representatives’ feedback would inform evaluation of weed management progress, and review and adjustment of *Action Plan 2025-30* where required. Such a workshop would provide opportunities for reporting of landscape scale spread of weeds, and emergence of weeds of concern. Accordingly, the Society strongly endorses establishment and annual meetings of the proposed Blue Mountains Strategic Weed Management Working Group (BMSWMWG) (*Effective Management – Asset Protection/Action Plan 2025-30*). Other invited participants could include NPWS, Blue Mountains Conservation Society, Blue Mountains Weed Action and Blue Mountains World Heritage Institute.

24. The Society’s view is that there is scope for better management and co-ordination of weed treatment work that should be continued beyond BMCC managed land and onto land managed by other entities. For example, BMCC bushcare weed treatment work halts when a NPWS boundary is encountered. Quite probably, BMCC professional staff encounter the same boundary complications. When weeds continue to flourish “over the fence/boundary”, weed treatment work already undertaken is largely rendered ineffectual, due to seed spread. This issue should be specifically described and a management response outlined.

Recommendation: *Action Plan 2025-30/EFFECTIVE MANAGEMENT – ASSET PROTECTION/LOCAL ACTION/ p) Establish communication pathways with public entities to facilitate effective cross-tenure field weed management*

work/PERFORMANCE MEASURE/communication channels established with NPWS and other land tenure organisations (p.75).

25. The Society believes that a similar issue arises when property owners and organisations treating environmental weeds wish to approach BMCC and obtain co-operation where boundaries are adversely affecting treatment. To enable effective communication and weed treatment, this issue should be specifically described and a management response outlined.

Recommendation: *Action Plan 2025-30/Effective Management – ASSET PROTECTION/LOCAL ACTION/ q) Establish communication pathways with private landowners to facilitate effective cross-tenure field weed management work/PERFORMANCE MEASURE/communication channels to BMCC established for use by private landowners to enable effective field weed management work (p.75).*

26. The Society believes that environmental weed treatment issues frequently arise when weeds on sites (usually managed by BMCC) located adjacent to weed treated bushland sites remain untreated and a source of weed spread e.g. weed infested road verges and public parks located near weed treated bushland or bushcare sites. This issue should be specifically described and a management response outlined.

Recommendation: *Action Plan 2025-30/EFFECTIVE MANAGEMENT – ASSET PROTECTION/Local Action/ f) Identify, prioritise and coordinate control of widespread weeds across the four conservation landscapes and high management priority Subcatchments, including treatment of weeds on BMCC managed land adjacent to treated, high management priority sites.*

Thank you for providing the opportunity to comment on the important Blue Mountains environmental weed management issue and *BMCC Draft Weed Management Strategy 2025-2030*.

The Society wishes BMCC natural area managers, officers and field staff every future success with the task of managing environmental weeds in the Blue Mountains.

I would be pleased to answer any enquiries concerning the Society's submission, and may be contacted at president@bluemountains.org.au

Yours sincerely,



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