



**Arid  
Lands  
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Centre**

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## **Submission to the Buffel Grass Technical Working Group - Meeting 5**

November 14, 2023

Dear Members,

First, we acknowledge you are meeting during a devastating fire season, the impacts of which will be lasting and will be personally felt.

We request you consider this letter in your final meeting. It contains:

1. Comments on your response to our previous submission
2. Comments on issues raised in the now approved Buffel TWG Meeting 3 minutes
3. Comments on the Communique from Meeting 4
4. Update on ALEC's petition, calling for buffel class A/B weed declaration.

### **1. YOUR RESPONSE TO OUR PREVIOUS SUBMISSION**

Since the last meeting in response to our query to the Chair as to the TWG's consideration of ALEC's submission<sup>1</sup> and request to present, the Chair has advised:

"...The issues you raised in your paper were comprehensive although not new to the members of the TWG. The ALEC position on Buffel grass is well understood by all members of the group. Given the number of other matters to be dealt with at the next meeting, it is not considered necessary for a presentation."

We acknowledge the submission was circulated to members during the meeting. However, the Chair's response that the issues we raised "were not new to members" is unsatisfying, as we specifically raised the issues because we felt the minutes showed these issues had been inadequately considered

We therefore trust all issues raised in our previous letter will be properly considered. If the TWG disagrees with ALEC's submission, or does not think they are important, it should be able to explain why.

We would like to expand upon the following issues:

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<sup>1</sup>

[https://assets.nationbuilder.com/aridlands/pages/57/attachments/original/1696784302/Buffel\\_TWG\\_letter\\_ALEC\\_%281%29.pdf?1696784302](https://assets.nationbuilder.com/aridlands/pages/57/attachments/original/1696784302/Buffel_TWG_letter_ALEC_%281%29.pdf?1696784302)

## Economic consideration

The TWG's minutes show it has not grappled with the costs and economics associated with buffel's spread.

We request it acknowledge ALEC's comments on this issue and that the economic factors have largely been ignored.

We also request the TWG consider the following "back of the envelope" analysis, which, while conceptual only, may act as a starting point for discussion and which gives some perspective on the scale of the issue.

If the area infested with buffel is conservatively estimated at 500 km by 500 km (25,000,000 ha) and the cost of remediation is \$5,500 per ha, as Alice Springs Desert Park estimates<sup>2</sup>, then the cost of remediation is \$1.375e11 (i.e. \$137,500M or \$137B).

Even if only 10% of that infestation was unwanted the remediation cost is \$13.7B<sup>3</sup>

So if the damage occurred over the last 40 years, the damage has been about \$343M/year.

For comparison, the GDP contribution from all agriculture (including pastoralism) to Central Australia is \$90.6M<sup>4</sup>. If, for argument's sake, buffel grass increases pastoral output by 20%, then it may provide a benefit of \$18M/year, noting there are significant doubts about the sustainability of buffel as pasture.

***In other words the costs of buffel invasion appear to be over an order of magnitude (19 times) more than its (disputed) benefits.***

### Other economic considerations/approaches

Of course this analysis does not consider: the opportunity costs to other industries, including tourism biodiversity conservation, land management, carbon farming and the arts sector; health costs and churn in population in the Northern Territory's caused by loss of landscape amenity. Furthermore, the ethical acceptability of privatising a benefit at the expense of others, those irreplaceable considerations like loss of culture and species and those costs borne by the public like depletion of soils and atmospheric carbon emissions are all not considered.

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<sup>2</sup> <https://onlinelibrary.wiley.com/doi/full/10.1002/ece3.6724> (The best documented long-term buffel eradication case study, at the Alice Springs Desert Park, costs between \$50/ha/year in dry years and \$10,000/ha/year in wet years, with an average of \$5500/ha/year over 11 years (Gary Dinham in Friedel et al., 2008, Table 4).

<sup>3</sup> We think 10% is too low as buffel has severe environmental impacts on pastoral lands too, causing fires and putting species and ecosystems under pressure.

<sup>4</sup>

<https://economy.id.com.au/rda-northern-territory/industry-sector-analysis?WebID=310&IndkeyNieir=23000>

### ***Health impacts***

The health costs have not been considered by the TWG. We firmly believe these have been underestimated. In the 2022 NT Weed Risk Assessment given in section B4, “What is the plant’s potential to negatively affect the health of animals and/or people?” the rating is ‘low’, with no justification given for this rating. There is no reference to health expert a consultation or a review of relevant literature.

We note that the Aboriginal Medical Services Association NT, Central Australian Aboriginal Congress and the Department of Medicine at Alice Springs Hospital have signed an open letter calling for a class A/B weed declaration across the Territory. We urge the TWG to recognise the health impacts associated with buffel.

### ***Equity considerations***

The costs to other industries, and equity considerations as to who benefits and who pays with are not discussed.

### ***Ethical considerations***

There does appear to have been any consideration whatsoever as to the ethical acceptability of impacting on groups who do not want buffel and for whom it causes health impacts, loss of culture, let alone the ethics of putting species and populations at risk of extinction

## **2. NEW ISSUES RAISED IN THE NOW AVAILABLE MINUTES FROM MEETING 3**

We are concerned that the Minutes of TWG 3 indicated a continuing discussion about the benefits of grazing as a form of buffel management in Parks. It was not clear from the communique for Meeting 3 that this was occurring.

We note the TWG’s observation that grazing regimes which reduce buffel grass are generally overly intensive. However, we are alarmed by the continued comparison between buffel on the pastoral estate and National Parks and by the TWG wanting to visit areas showing “good grazing management neighboured (by) ungrazed national parks”

The biggest factor driving buffel’s spread is propagule pressure (ie buffel being present). For example Fensham et al 2013<sup>5</sup> found probability of buffel grass occurring in remnants was predominantly a function of the abundance of buffel grass in adjoining paddocks. The same study found cattle grazing modestly enhanced invasion, relative to the absence of grazing, but this difference was only significant without burning. Cattle are accelerating buffel’s spread across the country, through soil disturbance, seed spread and the presence of buffel near a property boundary, all of which makes it more likely that buffel will pass that boundary.

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<sup>5</sup> <https://besjournals.onlinelibrary.wiley.com/doi/pdf/10.1111/1365-2664.12009>

We frequently speak to Traditional Owners complaining about incursions of cattle and buffel seeds onto ALTs and the problem of buffel infestations and fire management that these create. Similarly Parks are clearly not resourced to deal with the shifted cost of buffel invasion.

If a biological control is being sought, then the cow is an incredibly blunt and ineffective instrument not backed by evidence. If the TWG seeks to release a biological control into Parks it should recommend that the NTG request the Australian Government investigate a biological control for buffel, using a robust research methodology.

There are numerous studies and reports, which have looked into the perennial idea of introducing cattle into the conservation estate, concluding this is a bad idea. The attached [REPORT ON THE INVESTIGATION INTO THE FUTURE OF CATTLE GRAZING IN THE ALPINE NATIONAL PARK](#), by the Alpine Grazing Taskforce, provides comprehensive coverage of one such study.

It is essential that the TWG is clear that buffel grazed by cattle has off site impacts, as this is a substantial (but not the only) reason as to why a class B weed declaration is needed on pastoral lands.

A more appropriate response to infestations in National Parks would be for the TWG to highlight the need for far greater investment in managing buffel in National Parks.

### **3. ISSUES RAISED IN THE MEETING 4 COMMUNIQUE**

#### **Objectives**

The TWG's objectives are largely supported. However we disagree with the following objectives:

1. "Not reduce the value of the pastoral estate" is highly inappropriate. In its role to advise on management approaches, it is essential that the TWG highlight the urgency and massive public interest in effective buffel management. How this is paid for and who pays is a political decision. Pre-empting these political considerations should not be muddying the TWG's deliberations on the necessity for best management approaches, including weed declaration. This is especially important given the TWG is narrow in its constituency, with the pastoral industry being the only industry represented, while the value of other industries is also clearly impacted.
2. "Reduce spread via transport corridors and mining operations." While clearly managing buffel spread via transport corridors and mining operations is essential, we have two concerns:
  - a. It is too narrow. Given buffel's massive impacts, we must seek to stop its spread everywhere, not just transport corridors and mining operations.
  - b. It is too modest in its ambition for transport corridors and mining operations. With sufficient investment we consider the net spread can be stopped along road corridors and that this is deeply in the public interest.

#### 4. PETITION CALLING FOR CLASS A/B WEED DECLARATION

On 3 November ALEC launched the following [petition](#). As of 14 November 2023, it has received an enthusiastic response with around 450 signatories, including a high proportion of people living in Central Australia.

#### CONCLUSION

While we acknowledge the substantial work that has been done, and that the TWG's minutes already makes a compelling case for a strong (class A/B) weed declaration, **ALEC is firmly of the view that: 1). the extent and scale of risks posed by buffel invasions, and 2). the urgency of responding to buffel invasion, are both understated across the TWG's published statements.**

Simply put, the issue of buffel weed invasion is epic in its scale and its consequences are tragic.

We have to slow / stop buffel's spread and mitigate its impacts. Buffel knows no boundaries. A class A weed declaration is warranted in areas that it has not reached, for all land tenures along with those infested areas where its eradication is needed. In the remainder, while buffel's impacts are disastrous, given that even a biological control ultimately can be expected to deliver suppression and not eradication, a class B classification would be suitable to at least prevent its spread.

We want to assure the TWG that through our many meetings, consultation with members and at public events and most strikingly with First Nations People, there is widespread and strong support for decisive action including both a class A/B weed declaration and a major investment in a buffel weed management plan.

Thank you for your consideration.

Kind regards,

A handwritten signature in black ink, appearing to be 'AT', with a long horizontal line extending to the right.

Adrian Tomlinson

Chief Executive Officer