

Bryce Wilde
Executive Director
Natural Resources Commission
Level 10, 15 Castlereagh Street
Sydney NSW 2000
By email: Bryce.Wilde@nrc.nsw.gov.au

11 April 2013

Dear Mr Wilde,

Submission on proposed listing of Yellow Mimosa (*Vachellia farnesiana*) as a feral native species

The Nature Conservation Council of NSW (NCC) and the National Parks Association of NSW (NPA) welcome the invitation to comment on this proposal.

NCC is the peak environment organisation for New South Wales, representing more than 100 community environment groups from across the State. NPA is the leading state non-government organisation concerned with the protection and enjoyment of nature, through a well-managed national parks system and other means. Both organisations have taken an active interest in promoting the conservation and good management of native vegetation. Both organisations also have a statutory obligation under the *National Parks and Wildlife Act 1974* to nominate members to the National Parks and Wildlife Regional Advisory Committees and the Advisory Council.

We note that within NSW, Yellow Mimosa (*Vachellia farnesiana*) is known to be an invasive threat to Mitchell Grass grasslands. These grasslands form part of federally listed ecological communities such as the critically endangered “Natural Grasslands on basalt and fine-textured alluvial plains of northern NSW and southern Queensland” ecological community. It is therefore important that appropriate control measures are taken to mitigate the negative environmental impacts of this species. In addition, as a resilient plant of tropical/semi tropical origin, predicted climate change scenarios can be expected to favour further its spread in arid and semi-arid areas, hence reinforcing the need for active control measures.

Despite the threats posed by Yellow Mimosa, we note that it is still being promoted for horticultural use in Australia in some cases. Notably, seeds of *Vachellia farnesiana* were observed being promoted under an e-bay pricedumper advertisement.

The history of this species means that determining appropriate control measures is a complex task. Yellow Mimosa (*Vachellia farnesiana*) is generally accepted to have reached Australia prior to the conventionally accepted date of European settlement but just when, where and how appears to be unresolved. The distribution and spread of this species within Australia has been linked with transport routes, particularly those of cameleers through the outback.

As set out in the position paper and references, this is reflected in its differing classification in different Australian jurisdictions, as a 'weed', as an invasive native or exotic species and now potentially as a 'feral native species' under the NSW Vegetation Legislation. Specifically, in four NSW Catchment Management Areas Yellow Mimosa is listed as an Invasive Native Species, enabling it to be cleared under an approved Property Vegetation Plan. It is listed as a priority environmental weed under the 2011 Biodiversity Priorities for widespread weeds in the Namoi CMA.

Given this anomalous status, decisions made about the listing and classification of Yellow Mimosa could have implications for the management of other plant species (and possibly even animals such as the dingo), which are believed to have come to Australia relatively recently, whether by natural processes or introduction by humans, but prior to the conventionally-used 'native' cut off of 1788.

NCC/NPA submit the following points for consideration

1. Control of Yellow Mimosa is warranted to limit its spread in a timely manner.
2. Control measures should ensure a precautionary and ecologically sustainable approach is followed so as to minimise adverse ecological impacts on native vegetation communities (including listed EECs and species) due to broad-brush application of chemicals or mechanical clearing of native vegetation communities.
3. Given the impacts of Yellow Mimosa spread, as well as control measures, on important remnant native habitat, including species and ecological communities listed under State and Federal laws, the relevant agencies should be consulted and involved in defining localities to be treated and the development and review of appropriate control measures.
4. Listing Yellow Mimosa as a 'feral native species' under the NSW Vegetation Legislation means that its control and management would be considered a Routine Agricultural Management Activity (RAMA) and thus exempt from vegetation clearance controls and the requirement for a Property Vegetation Plan (PVP). This could potentially provide an opportunity for misuse or abuse of vegetation clearance controls by uninformed land managers. If this approach is taken, it is important that the code of practice emphasises restoration and management of native vegetation after clearing. It should not allow areas to be cleared of Yellow Mimosa in order to replace it with other exotic species, as this would create significant potential for

abuse of this listing. Any listings of species as “Feral Native Species” should include a review process to mitigate any adverse environmental impacts.

5. A single clear and Australia-wide definition should be developed to cover anomalous species such as the Yellow Mimosa where timing of arrival and origin are uncertain. The different terms that are used, and the implications of these under the varying Australian State, Territory and Federal jurisdictions is confusing and potentially has adverse environmental implications.
6. Ongoing monitoring of the status of Yellow Mimosa and further research into its ecology and best-practice management and control techniques is required. Governments have an important role in fostering such research on this and other invasive species, noting in particular predicted climate change implications and taking into account ecological as well as economic and social considerations for the long term. This research should inter alia feed into a review of the NSW Invasive Species Plan 2008-2015.

Yours sincerely,



Pepe Clarke
Chief Executive Officer
Nature Conservation Council of NSW



Kevin Evans
Chief Executive Officer
National Parks Association of NSW