



# Mount Roland LAND CARE

## Submission Re the State Government's intention to make *Digitalis* (foxgloves) a Declared Weed in Tasmania

Mount Roland Land Care (MRLC) is in its 25<sup>th</sup> year of operation, has 123 current members, and in 2023 won the Tasmanian Landcare Community Group award. This submission has been prepared by the MRLC Weeds Subcommittee, through a consultation process involving the Governing Committee and the entire MRLC membership.

Mount Roland Land Care has been actively managing *Digitalis purpurea* (foxglove) in the Mount Roland and broader Kentish area since 2016, and over that period has accumulated direct on ground experience of the many threats it poses to our natural ecosystems, our agricultural industry and human health. We have witnessed the explosive spread of this weed across a range of environments. Even with well-resourced and sustained management programs at some sites, we have observed that control of foxgloves has not been achieved: foxgloves demonstrate invasiveness that is without precedent in our experience.

As such we welcome the announcement by the Tasmanian Government of its 'Intent to Declare *Digitalis* species', and see this as a positive step forward. The provision of quality information in these documents is greatly welcomed. A Strategic and coordinated approach to the management of foxgloves in Tasmania is in our view completely justified.

Given the threat posed by foxgloves, we would encourage the Tasmanian Government to also seek to have this weed nominated as a Weed of National Significance (WONS), to support a case for Australian Government funding assistance to help meet the substantial costs likely to be associated with managing foxgloves in Tasmania.

In response to the DRAFT documents, we have a number of specific comments to offer for the consideration of the Department, and we list those below.

- **The data informing government’s response is inadequate/ incomplete and grossly underestimates the scale of the problem.** The distribution of foxgloves in Tasmania as described in these reports is derived principally from the ‘Atlas of Living Australia’ (ALA). While this mapping platform (and iNaturalist) show promise, the data set for foxgloves in Tasmania is thin, and does not accurately reflect reality – the distribution of foxgloves in Tasmania is far greater than these records suggest, because only some areas have been mapped. To provide a few examples, in the ALA there are no recorded foxglove sites in the Paradise plantations adjoining Mount Roland, none in Stoodley, none in Lorinna, none in Beulah, none in Erriba, and none within 5km of Wilmot. And none on the north face of Mount Roland. But there are hundreds of hectares of foxgloves in those areas in Kentish, as local people know. The following picture shows in yellow the actual distribution of foxgloves on the north face of Mount Roland in 2020. In ALA no foxgloves are recorded in this area. Sadly, this foxglove population has expanded significantly since then.



The picture below shows spray contractors managing foxgloves within that yellow area in 2020.



For the Declaration documents, the absence of accurate mapping data appears to result in a misleading underestimation of the impacts that foxgloves are currently having, and the rate of spread that is evident on-ground. While the risk assessment acknowledges the threat of foxgloves, it speaks as if there is only an occasional plant here and there – but in reality, what we have are landscape level populations, that are already having very significant environmental impacts. And not only environmental impacts, there are also agricultural and social impacts. Foxgloves also carry a range of significant health risks for the health of humans, companion animals, farm animals and native animals, and these risks increase in proportion to the abundance of foxgloves in the broader environment.

- This may go a long way to explaining community angst about the foxglove situation in Tasmania – so many landowners are acutely aware of how invasive foxgloves have become, and the health threats they pose. And they have been very frustrated, feeling that their calls for help have not been heard.

**Foxgloves are currently having significant environmental, financial and social impacts in the Kentish community**

We know people who have sold up and moved away, because they can't deal with the foxgloves on their properties. We know of many who live a life of stress through spring and summer, as they 'drown' in a sea of foxgloves. These are very real social impacts of the foxglove invasion, yet these documents don't hint at these circumstances, let alone acknowledge them.

Urgent action is needed on two fronts. A great start would be employing additional NRE staff, tasked with getting out and becoming aware of the actual distribution of foxgloves in regional areas. MRLC warmly invites NRE staff to visit our area, and see the reality firsthand. A second more general step would be development of clear and agreed processes for mapping weeds in Tasmania, and pathways for uploading weed mapping data to a Tasmanian Government weed mapping platform. The List goes some way towards this, but with refinement it could become so much more powerful. Over time, this would provide the Government with a valuable source of information to support its decision making.

- **Exploring biocontrol options** - Judging by the documentation provided by NRE, there is no intent to explore options for the biocontrol of foxgloves in Tasmania. **We argue that investigating the options for biocontrol should be an immediate and urgent priority, and be supported by a budgetary allocation of sufficient size and duration.**

It's true that there is no guarantee that a suitable biocontrol agent will be found. It's also true that any program to evaluate possible biocontrol options would take many years – probably a decade - and only after that period of time might a biocontrol agent be available for release. But those factors should not prevent us from seeking possible biocontrol options, and there's no better time to start the process than today.

Some of us remember the scourge of ragwort across north western Tasmania in the 1970's and 1980's. Fields of yellow stretched into the far distance in Oldina, Gunns Plains, Lorinna, Sheffield, Paradise, and Mole Creek, amongst many other locations. Yes, ragwort can still be found in those locations today, but the control achieved through the release of biocontrol agents has been quite remarkable – reducing a dense monoculture to an occasional patch, here and there. It could be hoped that similar management could be achieved for foxgloves, and certainly this option is worthy of exploration. Already in many areas of Tasmania, foxgloves are well beyond any possibility of physical control, and continue to spread rapidly, often along and beside waterways. The ALA mapping may not record this, but people on the ground know it. Biocontrol may well be the only realistic option we have to limit the spread and populations of foxgloves in many areas of Tasmania, including our World Heritage Areas.

- The Digitalis risk assessment rightfully acknowledges the complexity of foxglove management in Tasmania, where one of our most loved and common garden plants has transfigured to become a super invasive environmental weed. How do we reconcile our love for the garden plant, with our urgent need to manage its weedy threat? The declaration documentation aims to strike a realistic balance. Is the balance right? Time will tell, and the submissions received will provide a good sense of whether the community is happy with the balance or not. Many would agree with active management and enforcement to protect key natural and agricultural assets, in the short term. Many would also agree that those in urban centres should not need to fear

enforcement, for a period of maybe 5 years, but in the meantime should be encouraged by an awareness raising campaign to contribute to the environmental health of Tasmania by removing foxgloves from their gardens. That would be clear and easy to explain, and would likely win the support of town and country people.

But the partial Declaration proposed by the State Government introduces complexity. The proposals for Class A and Class B and all the inbuilt flexibility have praiseworthy intent, but will be contentious, and dealing with that may take a lot of time and energy. The Class boundaries are imprecise at a property level. Importantly they appear not to consider active vectors for spread – for example waterways, roads, and trails. A set buffer width in one area will be inadequate in another. How are ‘reasonable measures’ for control defined? Why are towns exempt from control measures? In practice these matters may be complex and time-consuming to explain, oversee and administer, and consume much time and energy.

**We argue that the best outcomes will be achieved by a total Statewide Declaration supported by an initial management focus on protecting key natural and agricultural assets, a comprehensive community awareness raising campaign, an amnesty on control of foxgloves in urban areas for five years, and the development of a biocontrol program.**

- **Provisions for transport and disposal of foxglove plant material will require clarification if community confusion is to be avoided.** Will all foxglove material be subject to these requirements, or just material containing viable seed? How many Municipalities can provide deep burial facilities, and how accessible will they be? Will these more stringent requirements lead to an increased rate of illegal dumping, as has occurred in other jurisdictions?
- **An awareness-raising campaign is promised, and is much needed. A campaign built around a few Facebook posts and/or a glossy brochure would not be adequate. What is also needed is a well-resourced outreach program, that personally visits and connects with the communities most affected by foxgloves.** This is not just an additional task to be given to existing staff, it requires a budget allocation, and additional staff. The promotional campaign for ‘pumped hydro’ conducted by Hydro Tas is a current example of how this can be done effectively.
- **A comprehensive NRE guide to the management of foxgloves has been promised, and is urgently needed by land managers, but where is it?**
- The remaining dot points falls under the umbrella of ‘resourcing’. **Without adequate resources to support an awareness campaign, a management and compliance program, and a biocontrol program, the Declaration of foxgloves is not much more than words on paper, and the spread of foxgloves is likely to continue along its current trajectory. This is an alarming prospect for Tasmania.**

- It's stated that this Declaration aims to strike a balance between protecting environmental and agricultural assets from foxgloves, and not diverting resources away from managing eradicable weeds. This is a spurious dichotomy. It's not an either/or situation, as of course we can do both these things. The weed control budget is not fixed – it can be increased and it should be when there is a need to do so. Foxgloves have been likened to an environmental Covid outbreak. Faced with this situation, we need to reprioritize and increase our expenditure on weed management.
- The Tasmanian forestry industry deserves special mention. In our Kentish municipality, and we expect elsewhere, harvesting of plantation forests has been a trigger for an explosion in foxglove populations. We can provide numerous examples of this. The sudden exposure to light, and the massive soil disturbance and high traffic levels that are part of harvesting operations, strongly favour the spread of foxgloves, both within the plantation area and then beyond. Considering that the life of foxglove seed greatly exceeds the time frame for plantation rotations, this situation is set to persist for as long as the harvesting of plantations continues. How will the forestry industry manage this when these plantations are in designated Class A areas? Will the forestry industry be exempt from the provisions of this new Declaration and its requirements for management? If not, will it be provided with financial assistance to help it manage this problem?
- Will the various State government departments and agencies be required to control Class A foxgloves if that occurrence is on land they manage? What assistance will be provided to those groups to enable them to take on these additional responsibilities? Where will the money come from? How will their performance be monitored?
- Will private land managers be provided with financial assistance for the management of foxgloves, in Class A, Class B or elsewhere? Where will this finance be sourced?
- Who will be monitoring and enforcing the 'requirement' for control in Class A? Where are the resources coming from to support that enforcement? Is local government expected to play a role in compliance, if so, how is that to be resourced?

The seed life of foxgloves is 80 years, and this highlights the need for long term management, and long term commitment to allocation of resources. It also highlights the need to develop a foxglove biocontrol program – in the long term that may be most effective and economical way of limiting the spread of foxgloves in Tasmania.

To conclude, in many ways this 'intent to declare' is an encouraging document: it is an acknowledgement by the State Government that foxgloves are a weed of significance in Tasmania. That's a large step forward. Much quality information has been included in this paperwork, and that is a credit to the NRE staff who have worked to create these documents - their efforts should be applauded. But the urgency of management, and the real impact of foxgloves now, are both underestimated in these documents. The distribution of foxgloves is far more pervasive than is shown in the ALA mapping. Control of foxgloves in Tasmania is already beyond physical control in many areas. The rate of spread is alarming, and is having major social impacts, currently creating distress in many Tasmanian regional communities.

In order for a credible management strategy to be formulated, the Department needs to visit foxglove sites across the State, talk to landowners and on-ground weed managers, and hear the concerns of the community, and see first-hand the actual distribution of foxgloves. Then they would become aware of the urgency of the foxglove crisis.

After gathering information from across Tasmania, the Government will then be able to formulate a realistic management strategy for foxgloves that focuses on strategic protection of priority assets and broad community education. Control of foxgloves will be expensive and long term, and the prospect of that commitment will be challenging to Government at all levels. A formal Declaration of foxgloves in Tasmania is certainly a step in the right direction. Nominating foxgloves as a Weed of National Significance may be a vital further step towards securing finance to enable management. A Biocontrol program may well assist with foxglove control, though the benefits of biocontrol are many years away. However, a biocontrol program offers hope to the community, and steps to initiate this process should be pursued as a matter of urgency.