

The Honourable Ryan Smith MP
Minister for Environment and Climate Change
Level 17, 8 Nicholson Street
Melbourne, VIC 3000

27 January 2011

Dear Mr Smith,

As concerned scientists, we write regarding the recently-announced trial of strategic cattle grazing as a tool to reduce bush fire risk in Victoria's high country, including the Alpine National Park. We strongly believe that the ban on livestock grazing in alpine parks should be maintained (See ESA Draft Position Statement, *Alpine Grazing* - attached). The Alpine National Park requires sensitive management to maintain its environmental and National Heritage values and the negative ecological impact of cattle on Australian native ecosystems is well documented. The reintroduction of cattle into this area is not consistent with the objectives of managing National Heritage areas. We are specifically concerned that the current trial:

- i) potentially represents a breach of the EPBC Act;
- ii) does not adequately address the full range of relevant ecological values; and
- iii) is not subject to appropriate peer review processes.

This trial is taking place within a region known to include EPBC-listed threatened species and communities. While the study areas have been identified to avoid EPBC-listed ecological communities, the absence of EPBC-listed species in the study sites cannot be inferred without undertaking ecological surveys. A number of threatened species are known to occur in adjoining areas (See attached map), and given the study areas have unfenced boundaries, the cattle do not currently have tracking collars, and there is no permanent on-site presence by Parks Victoria staff to ensure compliance, we are concerned that communities and species listed under the EPBC Act may be impacted by this trial. The trial should therefore be referred to the Federal Minister for Sustainability, Environment, Water, Population and Communities for approval under the EPBC Act before proceeding.

Investment in research is always welcome; however, ecological research that is intended to determine appropriate management actions requires clear articulation of the problem, identification of alternative management actions, and a framework enabling evaluation of the costs and benefits of those actions with regard to the management objectives and other relevant values. We are concerned that these steps have not been clearly addressed in the case of the current grazing trial. Relevant environmental values that must be considered include fuel load and fire risk, aesthetics, human safety, vegetation composition and

condition, water supply and quality, soil condition, native fauna and ecosystem function. There is no indication that the full range of relevant values is being considered in the current research summary, and no explicit framework for managing trade-offs between values has been identified.

The issue of grazing in the Alpine National Park is a highly charged one, and is characterized by entrenched positions amongst stakeholders. Given the divisive nature of this issue, an appropriate governance and administrative structure that ensures transparency and scientific integrity is essential. The provision of high quality science demands independent peer review at the stages of proposal, conduct and communication. This trial has commenced without independent peer review to assess the viability of the research proposal. The establishment of an independent panel of scientific experts to oversee all aspects of the research into cattle grazing in the high country, including its initial design, is necessary to ensure scientific credibility of the current research trial.

We request that the trial be postponed until the Federal Minister for Sustainability, Environment, Water, Population and Communities has considered the matter and determined if the cattle grazing is a controlled action under the EPBC Act. In addition, we request the State Government immediately establishes an independent Expert Scientific Panel to oversee all stages of the research. To cover the complex range of issues inherent in this study, such a panel must include scientists of international standing with expertise in alpine plant ecology, wildfire behaviour, spatial modelling, ecological risk assessment, experimental design, statistical analysis and environmental decision analysis. The establishment of Expert Scientific Panels has precedence in natural resource management decisions that are characterized by contradictory and entrenched positions amongst stakeholders (See ARI Technical Report # 195 - attached).

If you have any questions or wish to discuss this matter, please do not hesitate to contact Dr Libby Rumpff (lrumpff@unimelb.edu.au, 03 8344 8091) or Dr Georgia Garrard (ggarrard@unimelb.edu.au, 03 9035 8091). We look forward to your response.

Yours sincerely,

Concerned Scientists

Cc: Mr Greg Wilson, Secretary, Department of Sustainability and the Environment

Mr Lee Miezi, Director, Forest and Parks Management and Operations, Forests and Parks Division, Department of Sustainability and the Environment

The Honorable Ted Baillieu MP

The Honorable Peter Ryan MP

The Honorable Tony Burke MP

Mr Matt Ruchel, Executive Director, Victorian National Parks Association

Mr Phil Ingamells, Park Protection, Victorian National Parks Association