

Sept 9, 2014

## **Submission by the Victorian National Parks Association (VNPA) in response to the Draft Management Plan for the Greater Alpine National Parks.**

### **Part 1: General comments**

#### **Introduction**

Many thanks for the opportunity to make this submission

The Victorian National Parks Association is an independent, community based NGO with around 3,000 members and some 12,000 registered supporters. Since 1952 we have been actively promoting the protection of Victoria's natural heritage on both public and private land, and in the marine environment of Victoria.

Two the most important issues driving the formation of the VNPA was the need for an Act of Parliament to direct management of national parks in Victoria, and also the need for a comprehensive national park to give protection to the valuable and vulnerable ecosystems in the alpine region of the State. Since that time the VNPA has consistently, and strongly, advocated for those same issues.

It is in that context that we frame this submission: for good reason, the national parks in the alpine region must be protected and managed under the clear objects of Victoria's National Parks Act 1975.

**Note:** Throughout this submission we have not referred to the plan's classification of ecosystems: '*alps ecosystem*', '*wet forest and rainforest ecosystem*' etc. This is because we don't know how they are defined. If they are to be used there should be a clear indication of what EVCs they are made up of, or some other clarification (are they BVTs?) that enables linking management actions to established FFG/EPBC processes, fire policy etc. Wet forests and rainforests, for example, have totally different relationships to fire. We are unsure why there is a need to develop a new series of categories. We have generally stuck to EVCs or EVDs in this submission.

#### **A: Legislation relevant to the management plan**

There is a considerable body of legislation, State and Federal, that applies to the proposed management plan but these different laws, and the regulations under those laws, are not made sufficiently clear in the draft. If, as Parks Victoria claims, the plan will be Parks Victoria's 'contract with the people', then the most compelling legal obligations of that contract should be made clear in the plan.

Some of those legal obligations are listed here.

## 1/ Victoria's National Parks Act 1975

Victoria's National Parks Act offers the highest level of protection for the natural systems in the parks. It gives protection to all native species and natural systems within national and State parks, whether threatened or not. According to the Act, the 'objects' are:

- “(a) to make provision, in respect of national parks, State parks, marine national parks and marine sanctuaries—*
- (i) for the preservation and protection of the natural environment including wilderness areas and remote and natural areas in those parks;*
  - (ii) for the protection and preservation of indigenous flora and fauna and of features of scenic or archaeological, ecological, geological, historic or other scientific interest in those parks; and*
  - (iii) for the study of ecology, geology, botany, zoology and other **sciences** relating to the conservation of the natural environment in those parks; and*
  - (iv) for the responsible management of the land in those parks;*
- (aa) to make further provision in respect of designated water supply catchment areas in national parks—*
- (i) for the protection of those areas; and*
  - (ii) for the maintenance of the water quality and otherwise for the protection of the water resources in those areas; and*
  - (iii) for the restriction of human activity in those areas for the purposes of subparagraphs (i) and (ii);”*

These 'objects' are clarified in “the Secretary's” obligations under the Act:

- “(a) ensure that each national park and State park is controlled and managed, in accordance with the objects of this Act, in a manner that will—*
- (i) preserve and protect the park in its natural condition for the use, enjoyment and education of the public;*
  - (ii) preserve and protect indigenous flora and fauna in the park;*
  - (iii) exterminate or control exotic fauna in the park;*
  - (iv) eradicate or control exotic flora in the park; and*
  - (v) preserve and protect wilderness areas in the park and features in the park of scenic, archaeological, ecological, geological, historic or other scientific interest;*
- (aa) have regard to all classes of management actions that may be implemented for the purposes of maintaining and improving the ecological function of the park;*
- (b) ensure that appropriate and sufficient measures are taken to protect each national park and State park from injury by fire;*
- (ba) ensure that appropriate and sufficient measures are taken (including seeking the making of an appropriate agreement under section 321(1)) —*
- (i) to protect designated water supply catchment areas; and*
  - (ii) to maintain the water quality of and otherwise protect the water resources in those areas; and*
  - (iii) to restrict human activity in those areas for the purposes of subparagraphs (i) and (ii);*

*(c) promote and encourage the use and enjoyment of national parks and State parks by the public and the understanding and recognition of the purpose and significance of national parks and State parks; and*

*(d) prepare a plan of management in respect of each national park and State park.”*

Notably, the act requires the protection of the park in its ‘*natural condition*’, and the protection of ‘*indigenous flora and fauna*’. In other words, the parks’ managers are not only required to secure long-term protection for listed threatened species, but all of the parks’ species in their natural condition. This reflects the well-established global nature conservation imperative: the long-term protection of large areas of intact ecosystems.

Further, in the last point (d) above, it is clear that the plans of management required for “each national and State park” under the Act, is meant to account for the objects and responsibilities listed above.

The VNPA does not believe the current draft plan for the combined ‘Greater Alpine National Parks’ fulfils the requirements of the National Parks Act because:

- The prime objectives of national park management are not clarified in the draft plan, or consistently adhered to;
- It is not generally at all clear what actual management actions are planned;
- It is not at all clear what is proposed for each park under the plan. Indeed most parks other than the Alpine National Park are rarely referred to specifically, and their individual management predicaments are rarely recognised.

Parks Victoria has at various times claimed that the intention of the Act in relation to management plans will be satisfied by a combination of this general ‘Plan’ and the proposed triennial ‘Implementation Plans’. But there is so far (eg for the current SW parks plan) no evidence that these more detailed implementation plans will ever eventuate, or that there will be any public input to that process. And in the special case of the Alpine National Park, if both the general Management Plan and the detailed Implementation Plan together constitute the management plan required under the Act, then both must be tabled in Parliament. Indeed, they both should have been prepared at the same time, and given the long gestation time for this plan, that should certainly have been possible.

## **2/ Other relevant State and Federal Acts**

While the NP Act, as outlined above, offers the highest level of protection to the protected areas in question, there are a number of other Acts of Parliament, Federal and State, that must also be taken into account. Importantly, they highlight issues relevant to management of the parks in the draft plan.

Victoria’s **Catchment and Land Protection (CALP) Act**, which obliges land owners to control weeds on their property, makes it clear that the ‘owner’ of public land is, for the purposes of the Act, the Secretary of DEPI.

The **Federal Environment Protection and Biodiversity (EPBC) Act** gives National Heritage status to the Alpine, Baw Baw, Mount Buffalo and Snowy River National Parks and the Avon Wilderness.

And both the **Federal EPBC Act** and the **Victorian Flora and Fauna (FFG) Act** list the considerable number of threatened species and communities relevant to the plan. It would be sensible (and educational, see NP Act objects (a) (iii) above) to list all of those species and communities, as well as the full **DEPI advisory list**, as an appendix to the proposed plan.

And it would be particularly useful to list all **FFG-listed ‘potentially threatening processes’** relevant to the parks, and use that list as a minimal guide to the development and identification of management actions in the plan. The list identifies processes well-recognised by the scientific community as needing real and ongoing action if many species and communities are to survive in the long-term. The FFG threatening processes list below (in alphabetical order) selects those processes most relevant to the parks in this plan. Where the applicability may not be immediately obvious, we have indicated the relevance in parenthesis [in small type]:

1. Alteration to the natural flow regimes of rivers and streams [eg Rocky Valley and Pretty Valley Dam and aqueducts; Snowy River environmental flows]
2. Alteration to the natural temperature regimes of rivers and streams [change in vegetation cover, sudden release of water from dams]
3. Collection of native orchids [caution in divulging locations, education].
4. Degradation and loss of habitats caused by feral Horses (*Equus caballus*).
5. Degradation of native riparian vegetation along Victorian rivers and streams [willows etc.].
6. Habitat fragmentation as a threatening process for fauna in Victoria [Burrmys].
7. High frequency fire resulting in disruption of life cycle processes in plants and animals and loss of vegetation structure and composition.
8. Human activity which results in artificially elevated or epidemic levels of Myrtle Wilt within Nothofagus-dominated Cool Temperate Rainforest [track and roadworks adjacent to Nothofagus in Baw Baw NP].
9. Inappropriate fire regimes causing disruption to sustainable ecosystem processes and resultant loss of biodiversity.
10. Increase in sediment input into Victorian rivers and streams due to human activities [track and roadworks; too frequent burning; rapid attack capability in the event of severe bushfires].
11. Infection of amphibians with Chytrid Fungus, resulting in chytridiomycosis [movement of vehicles, cattle etc].
12. Introduction of live fish into waters outside their natural range within a Victorian river catchment after 1770 [need for biosecurity strategy/vigilance].
13. Invasion of native vegetation by Blackberry *Rubus fruticosus* L. agg.
14. Invasion of native vegetation by ‘environmental weeds’.
15. Loss of coarse woody debris from Victorian native forests and woodlands [hiker education, campgrounds, horse camps, frequent fuel reduction burns].
16. Loss of hollow-bearing trees from Victorian native forests [safety procedures before fuel reduction burns etc.].
17. Loss of terrestrial climatic habitat caused by anthropogenic emissions of greenhouse gases.
18. Predation of native wildlife by the cat, *Felis catus*.
19. Predation of native wildlife by the introduced Red Fox *Vulpes vulpes*.
20. Prevention of passage of aquatic biota as a result of the presence of instream structures [eg Rocky Valley and Pretty Valley Dam and aqueducts].
21. Reduction in biodiversity of native vegetation by Sambar (*Cervus unicolor*).
22. Reduction in biomass and biodiversity of native vegetation through grazing by the Rabbit *Oryctolagus cuniculus*.
23. Soil degradation and reduction of biodiversity through browsing and competition by feral goats (*Capra hircus*)
24. Soil erosion and vegetation damage and disturbance in the alpine regions of Victoria caused by cattle grazing.
25. Spread of *Pittosporum undulatum* in areas outside its natural distribution.
26. The introduction and spread of the Large Earth Bumblebee *Bombus terrestris* into Victorian terrestrial environments.

27. The spread of *Phytophthora cinnamomi* from infected sites into parks and reserves, including roadsides, under the control of a state or local government authority.
28. Threats to native flora and fauna arising from the use by the feral honeybee *Apis mellifera* of nesting hollows and floral resources.
29. Use of Phytophthora-infected gravel in construction of roads, bridges and reservoirs.
30. Wetland loss and degradation as a result of change in water regime, dredging, draining, filling and grazing [including impacts of deer, cattle!].

Some of the above (and other) issues are also identified in these **EPBC listed Key Threatening Processes**:

1. Loss and degradation of native plant and animal habitat by invasion of escaped garden plants, including aquatic plants.
2. Loss of climatic habitat caused by anthropogenic emissions of greenhouse gases.
3. Novel biota and their impact on biodiversity [need for biosecurity strategy/vigilance].
4. Predation by European red fox.
5. Predation by feral cats.
6. Predation, habitat degradation, competition and disease transmission by feral pigs.
7. The reduction in the biodiversity of Australian native fauna and flora due to the red imported fire ant, *Solenopsis invicta* (fire ant) [possible distribution includes lower elevations of plan area such as in SRNP: need for biosecurity strategy/vigilance].

Of course, there are other threatening processes that have not yet been nominated (eg deer other than Sambar).

### 3/ International obligations

National parks play a critical role in the long-term survival of our natural heritage, and that role is recognised in the **International Convention on Biological Diversity** which Australia has signed and ratified.

According to Article 8 of the Convention (in-situ Conservation), signatories must, among other things:

- *Establish a system of protected areas or areas where special measures need to be taken to conserve biological diversity;*
- *Develop, where necessary, guidelines for the selection, establishment and management of protected areas or areas where special measures need to be taken to conserve biological diversity;*
- *Promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings;*
- *Promote environmentally sound and sustainable development in areas adjacent to protected areas with a view to furthering protection of these areas;*
- *Rehabilitate and restore degraded ecosystems and promote the recovery of threatened species, inter alia, through the development and implementation of plans or other management strategies;*
- *Prevent the introduction of, control or eradicate those alien species which threaten ecosystems, habitats or species; etc.*

We note here that under the IUCN and World Commission on Protected Areas (WCPA) system of classifying different protected areas, national parks have a particularly high level of protection. They are:

*"...large natural or near natural areas set aside to protect large-scale ecological processes, along with the complement of species and ecosystems characteristic of*

*the area, which also provide a foundation for environmentally and culturally compatible, spiritual, scientific, educational, recreational, and visitor opportunities.”*

We also note the words of IUCN Director General Julia Marton-Lefèvre, in Nov 2012:

*“Protected areas have been a cornerstone of IUCN’s work since its foundation in 1948, and that of our World Commission on Protected Areas – the world’s premier body of protected areas experts and professionals.*

*From a handful of national parks at the turn of the 20th century, today we have over 160,000 protected areas, covering 12.7% of the world’s land surface.*

*It is a truly remarkable global estate that remains a fundamental strategy to conserve biodiversity and ecosystem services, with multiple benefits to people.*

*Simply put, large healthy protected ecosystems are the best tool we have to conserve biodiversity, especially against the backdrop of climate change.*

*We are in the middle of a global extinction crisis, with rates of biodiversity loss up to 1,000 times above pre-human levels. This depletes our natural capital and undermines sustainability at a planetary, as well as local, scale.*

*Well managed protected areas are the most robust proven solution to turn the tide of extinction.”*

[http://www.iucn.org/about/work/programmes/gpap\\_home/pas\\_gpap/gpap\\_perspective/?11555/Putting-Protected-Areas-to-Work-to-Address-Global-Challenges](http://www.iucn.org/about/work/programmes/gpap_home/pas_gpap/gpap_perspective/?11555/Putting-Protected-Areas-to-Work-to-Address-Global-Challenges)

The process to develop new management plans for the national parks of Victoria’s alpine region offers a rare chance to reinforce the important management prescriptions, obligations and principles outlined above. Unfortunately, the current plan hasn’t grasped that opportunity, leaving current and future management proposals for the parks open to misguided and/or opportunistic re-interpretation of the legislation.

## **B: Significant failures of the draft plan**

While there are a number of welcome features in the draft plan, it fails in some very fundamental ways.

### **1/ Is the draft a fair dinkum management plan?**

As noted in section **A: 1/** above, the VNPA does not believe the current draft plan for the combined ‘Greater Alpine National Parks’ fulfils the requirements of the National Parks Act: it is neither a ‘plan’, nor does it clearly relate to each park it claims to plan for.

This ‘plan’ gives us precious little detail and covers not one park, but 1/3 of Victoria’s park estate (some 900,000 ha) in one slim volume. Though Parks Victoria plans to produce further plans (an implementation plan and annual work plans), we see no evidence that these are likely to appear.

Errinundra and Baw Baw National Parks, in particular, are rarely mentioned in the draft plan, except in the context of general management goals that apply to all of the parks.

This is particularly worrying in the case of Errinundra National Park, which has no alpine or sub-alpine features, is not part of the Australian Alps National Parks and is not included in the National Heritage listing for the Australian Alpine National Parks. The maintenance of its important natural values – especially the unique nature of its cool temperate rainforests, and the unmatched extent of those rainforests in Victoria – require very careful consideration of likely threats and possible management interventions.

All national parks should have their own management plan or, if necessarily grouped with other similar parks, at the very least have clearly identifiable management actions applicable

to each park. At the very least, Errinundra National Park should be removed from this plan, and added to the proposed East Gippsland coastal area plan where its important management requirements can be more adequately addressed.

While there is no clear consensus on exactly what constitutes a management plan, the IUCN (WCPA) provides these useful and sensible guidelines (with our underlining and emphasis):

*A Management Plan should be:*

1. *Clear and accessible: easy to read, jargon free and well presented.*
2. *Concise and comprehensive: no longer than is absolutely necessary, but with enough information to fulfil its functions.*
3. *Accurate and objective: without major errors or statements likely to date and with the criteria for all judgements clearly explained.*
4. *Systematic and logical: With management policies derived from an assessment of the site and with a clear rationale given for all proposals.*
5. *Acceptable and motivating to all those with interests in and emotional attachment to the site.*
6. *Precise and practical: with clear objectives, realistic methods for achieving them, resulting in desired outcomes which can be monitored.*
7. *Focused and effective: fulfilling its purpose as a tool for site management, meeting the needs of its users and satisfying any legal or other obligations.*

*Guidelines for Management Planning of Protected Areas,*

Best practice Protected Area Guidelines Series no.10,

WCPA 2003 (P. 17)

(Note: the above document, on p. 12, also gives a diagram of a 'typical planning hierarchy', but the subsidiary plans in that diagram do *not* match PV's proposal for 'Implementation Plans' etc. The management plan is definitely the document that should say what will happen in a park.)

## **2/ Protection of nature should consistently be the prime objective of a national park**

The draft plan gives lip service to the prime purpose of national parks – protection of the environment – but then makes increasing concessions to user groups and agendas that may not serve the park at all well.

Throughout the plan, various proposals are put forward (many of which have been generated by tourism interests, alpine resorts etc) without any analysis of whether they will contribute to the better protection of the park, or indeed offer the best experience to visitors.

**The proposed Rocky Valley 'around the lake' walk/bike track** along the southern shore of Rocky Valley Dam is a classic example of this (p. 74). It was originally proposed c. 2004/5 by the Falls Creek Alpine Resort which:

- planned the track,
- was to fund and perform the construction of the track
- commissioned an EES to identify offsets for the track.

As far as we could see at the time this was not part of any park management process – not even a process to look at a rationalisation of walking tracks in the Rocky Valley area. It would impact on wetland and peat bed areas, unnecessarily open up the ecologically sensitive Rocky Knobs area to off-track bike riders (the situation would be hard to control), involve transplanting an EPBC-listed vulnerable species (*Euchiton nitidulus*, Shining Cudweed) and, whenever the level in the dam was lowered, the track would present park visitors with a foreground of a desolate muddy foreshore. In 2008 an EPBC referral was initially submitted

to the Federal Government (jointly by the Falls Creek Management Board and Parks Vic) in relation to this track, but was then withdrawn.

For some reason this long-abandoned proposal has suddenly re-emerged in the current draft plan, still without any evidence that it is part of a rational assessment of walking possibilities in the area, or that it will actually contribute to the prime objectives of the park.

A re-assessment of tracks in the area, which we asked for at the time of the original proposal, might show (for example) that the currently badly sited Heathy Spur track on the northern side of Rocky Valley (which currently ambles straight through a number of peat beds) could perhaps be re-aligned and developed into a loop track with grand views. This would give visitors a short walk offering a real park experience, and the re-alignment (with occasional short boardwalks) could improve the condition of the wetlands and peat beds in the area.

As we said last time the ‘around the lake track’ was proposed:

- the environmental impacts are likely to be considerable, indeed untenable, in this particularly sensitive area;
- the planning process was flawed;
- there are far better ways to encourage and manage summer visitation to the area.

The Rocky Valley ‘around the lake’ track should not appear in the final management plan.

Prescriptions for **horse riding in the park** seem designed to benefit horse riders at the expense of the park. While horse riders are theoretically not allowed through wetland areas such as peat beds, fens, or mossbeds, these areas are inadequately mapped in the plan. Horse riders should be excluded from all areas where wetlands/mossbeds are common, and any other sensitive areas. Horse camps, which inevitably bring weed invasions, should be very carefully sited. For example there should be no horse camp at The Playgrounds, at the headwaters of the Buchan, where a number of threatened plants are found. Indeed the rationale for the reallocation of horse camps is not at all clear. We believe the positioning of new camps needs reassessment, allowing protection of natural values to be the overriding objective.

Also, while there *may* be advantages in some areas for off-track riding to spread the impact of horses (eg on some grassy plains), we can’t understand the assumption that this will be a sensible policy in wooded areas of the park. Indeed allowing ‘off track’ horse riding in these areas must inevitably lead to the formation of a large number of tracks, as horse riders follow any popular path of least resistance in any number of directions.

Horse riding has known impacts, such as increasing weed invasion (the horse camp at Pretty Valley is a clear case here). All current horse camps need urgent weed control programs.

More usefully, an independent assessment of the impacts of horse riding in the park should take place while this plan is being developed, allowing the development of appropriate planning for the activity.

### **3/ Cattlemen should not have privileged access to park management processes**

The treatment of the vexed issue of alpine cattle grazing is the most blatant example, in this draft plan, of pandering to a particular user group at the expense of the parks’ natural features.

The history of cattle grazing in the park is portrayed in the draft as a heroic exercise, without even the slightest suggestion that the activity has ever been contentious, let alone that decades of impeccable science show grazing has had long-lasting and sometimes catastrophic impacts on the natural systems in the Alpine, Mount Buffalo and Baw Baw national parks.



This bias in the proposed plan is extraordinary, highly misleading, and must be significantly rectified if the final plan is to have any credibility at all with interest groups other than the MCAV. (If Parks Victoria needs any advice on this matter, it need only look at its own information board at Wallaces Hut car park which says that, according to scientific studies, 'grazing was indeed harmful to the fragile alpine ecology'.)

In addition we note that:

- *"Soil erosion and vegetation damage and disturbance in the alpine regions of Victoria caused by cattle grazing"* is listed as a potentially threatening process under Victoria's FFG Act. This should be made clear in the plan.
- Cattle grazing is also identified as a damaging influence in a number of threatened species and threatened community listings, under both State and Federal law. (For example: the Policy Statement for the EPBC listing for *Alpine Sphagnum Bogs and Associated Fens* identifies "grazing and trampling by non-native animals" as a significant threat to the community. The EPBC Policy Statement continues: *"One of the better documented threats to alpine vegetation is the impact of animals introduced to Australia since European settlement. All alpine and subalpine regions on the mainland and in Tasmania were used for the summer grazing of cattle from the early 1800s onwards. Although cattle no longer have legal access to national parks, it is important to understand that the impact of non-native animals on alpine vegetation is long-term, with the effects remaining long after the initial problem is removed."*)
- There are many reports and published scientific papers that clarify and assess the damage caused by cattle grazing, but very few are listed in the draft's bibliography.
- The considerable efforts by PV staff, scientists, contractors and volunteers (including VNPA members) to help rectify the damage caused by cattle grazing have not been mentioned.

Alarming, the draft plan also proposes a formal '**collaborative working relationship' with the Mountain Cattlemen's Association** in management of the Alpine National Park, even though the cattlemen have consistently argued against the establishment of the park, consistently denied that cattle grazing has damaged the park, and some MCAV members have attempted to harm the reputations of individual scientists who have published peer-reviewed studies on the impacts of grazing.

Such a formal relationship will only give the MCAV added status, and be seen to be a very public endorsement of the cattlemen's spurious claims to be the Alpine National Park's best 'managers'. We note that Parks Victoria currently has no trouble reaching or communicating with the MCAV, so we are unsure what drives this proposed formation of a formal relationship.

As far as we know, PV has no formal relationship with any of Victoria's major environment organisations, even though they are clearly aligned with the parks' objectives, and have a considerable range of experience and knowledge within their memberships.

#### **4/ The proposed Wonnangatta Valley cattle grazing trial should not be mentioned in the plan.**

First and foremost, a legal challenge to the grazing trial has been mounted in Victoria's Supreme Court by the VNPA. Any proposed action under legal challenge should not appear in the plan.

Secondly, the premise under which the trial is deemed necessary, that cattle grazing can significantly protect the Wonnangatta Valley from the impacts of bushfires, has not itself been tested.

Notably:

- The only bushfire to reach the valley in recent history, the 2006 alpine fire, became extinguished halfway across the valley;
- There is no evidence that an occasional fire would hurt the native grasslands of the valley, indeed grasslands ecologists assure us the opposite is probably true (note the wording of the NP Act that the Secretary must “*protect each national park and State park from injury by fire*”);
- Two important published scientific studies, both of which looked at the effectiveness of cattle grazing on real fires in the alps, have neither been referred to in the draft, nor (it’s a major omission!) have they been included in the draft’s bibliography. They are:

1. Williams RJ, Wahren C-H, Bradstock RA, & Muller WJ, *Does alpine grazing reduce blazing? A landscape test of a widely-held hypothesis*, *Austral Ecology* (2006) 31, 925–936

This study looked used 419 survey points along 108 transect lines through both grazed and ungrazed areas of the Bogong High Plains after the 2003 alpine fire. The study found that:

*“Whatever effects livestock grazing may have on vegetation cover, and therefore fuels in alpine landscapes, they are likely to be highly localized, with such effects unlikely to translate into landscape-scale reduction of fire occurrence or severity. The use of livestock grazing in Australian alpine environments as a fire abatement practice is not justified on scientific grounds.”*

2. Williamson GJ, Murphy BP, Bowman DMJS, *Cattle grazing does not reduce fire severity in eucalypt forests and woodlands of the Australian Alps*, *Austral Ecology* (2013)

This later study, which used satellite and other data from both the 2003 and 2006 alpine fires, across grazed and ungrazed areas at all elevations in Victoria’s alpine region, found that:

*“crown scorch was strongly related to vegetation type but there was no evidence that cattle grazing reduced fire severity. There was some evidence that grazing could increase fire severity by possibly changing fuel arrays. Such landscape analyses are a critical approach given that large-scale grazing × fire trials are prohibitively expensive and impractical to conduct.”*

There is no evidence that either of these informative studies has been taken into account when deciding that the Wonnangatta trial was needed. And for reasons unknown to us, neither of these important studies has been deemed relevant to the proposed alpine parks management plan. That should be rectified.

## **5/ Science should be valued more highly in the proposed plan**

It is more-or-less implied throughout the plan that the findings of scientific studies should be matched with ‘traditional’ or ‘local’ knowledge. For example, in *Issue box 1: Active management and intervention* (p. 2), the second last paragraph rightly says that management of the parks must be careful and “based on evidence”. However, the following paragraph claims that a “new approach recognises that land management knowledge and expertise exist throughout the community”.

The confusion between evidence-based management and community knowledge continues to be muddled throughout the draft. There certainly is a lot of knowledge in the community, but there are also many claims of expertise in the community that can’t be supported by evidence. Indeed many claims people make about managing parks are simply not at all

helpful. The plan should draw a clear distinction between information supplied from claimed 'experience' or 'inherited knowledge' (both of which *may* be valuable) and the evidence arising from scientific studies.

We also note, with some incredulity, that the Scientific Advisory Committee set up to comment on this plan has apparently not met with Parks Victoria since the formation last year of the reconstituted, cattlemen friendly, Alpine Advisory Committee.

The long history of alpine science has "outstanding heritage value" in the National Heritage listing for the Australian Alps National Parks and Reserves. That heritage includes the three remarkable alpine journeys of botanist Ferdinand Mueller in the early 1850s, the inspired work of Alec Costin and his associates which laid the groundwork for modern alpine studies, the now famous high plains and grazing studies by Maisie Fawcett and Professor Turner, and the current work being undertaken on climate change, fire and many other issues by the large group of scientists linked to the Australian Institute of Alpine Studies.

Indeed the work produced by members of the **Australian Institute of Alpine Studies**, and the members themselves, should be heralded as an invaluable resource for park managers. It is a research capability and knowledge resource that most park managers around the world would rightly be jealous of.

Without the above body of scientific work there would possibly be no Alpine National Park, and our capacity to manage the natural systems there would be greatly diminished.

(It's worth noting here that many other historical/cultural/artistic/literary connections with the parks are also given short shrift in the plan.)

## **6/ Pest plants and animals need clear and effective action**

Some aspects of pest management are given welcome prominence in the draft plan, but there is little *clear* commitment to workable solutions.

The significant and growing **impacts of around 10,000 feral horses** for example, are at last given acknowledgement, and a range of treatment options are discussed. Indeed the process of engagement with the community and science over this issue was excellent: a well-resourced and well-directed search for solutions.

But unfortunately the draft plan states that "*the success of feral horse management will largely depend on whether effective control methods are acceptable to the community*", a surrender that will lead inevitably to a continuation of the current process of doing very little. And that lack of action has been the single greatest problem, and the actual cause of the current explosion of horse numbers through the park.

Under the National Parks Act, however, managers are unambiguously required to 'exterminate or control exotic fauna in the park'. The final management plan must own that imperative, and clearly outline the actions necessary to deal with the problem. It must outline how feral horse numbers will be controlled, and also outline an education strategy to inform the public about feral horse (and other feral animal) management in the park.

Feral horses should be removed from the Bogong High Plains, where a successful removal program is clearly achievable. If they are left there their range will spread (as is already happening at lower altitudes), and they will become far more difficult to control.

For the populations in the eastern alps: the plan should clearly advocate aerial shooting among the 'available' control methods (the draft currently doesn't), and specify the conditions under which it will be done (such as follow-up shooters to avoid unnecessary suffering, the presence of vets etc). The plan should also include the need to co-ordinate the control program with Kosciuszko National Park, and the need to continue control methods to take the population down to a level where its ongoing control will be affordable over the long-term (ie well below the 5,000 level cited in the draft). Lastly, the plan should advocate a

strong education program, highlighting the damage to the environment the current suffering of horses in fire and drought.

Similarly, it is very good that the plan makes it clear that **deer are causing widespread and growing damage to the park**, but again the plan goes weak at the knees when proposing solutions. The draft says that “community awareness of deer appears to be rising with growing public awareness”, but seems to be mute about the role PV should have had, and should continue to have, in educating the public about the very considerable deer problem. In the past (in our understanding), the reason PV has not seriously planned to control or eradicate deer populations has been because, while the wording of the NP Act clearly asks for control of feral animals, the Wildlife Act protects deer as a game species, limiting the number to be hunted at any time. However, we understand Parks Victoria can and should apply for an exemption from the restrictions in that Act:

- Section 7A of Victoria’s Wildlife Act says that the *“Governor in Council may declare protected wildlife to be unprotected in an area of Victoria”*
- And in *“Section 28G, Authorisation Orders as to taking etc. wildlife*
  - (1) The Governor in Council, on the recommendation of the Minister, may make an order authorising a class of person to do all or any of the following—*
    - (a) **hunt, take or destroy** wildlife;”...*
    - (2) The Minister must not make a recommendation under subsection (1) unless he or she is satisfied that the making of the order is necessary—*
      - (a) because wildlife is damaging buildings, vineyards, orchards, crops, trees, pastures, **habitats** or other property and authority is to be given by the order to **owners, occupiers or administrators** of such property or persons living in the vicinity of such property;*

Given that deer are a real and growing threat to many areas of the parks, and that Sambar are now listed as a Potentially Threatening Process under Victoria’s FFG Act, it’s surely reasonable to expect that the management plan process should establish PV’s exemption under the Wildlife Act, and then outline a clear strategy to deal with the problem.

Expanding the area available to deer hunting will not reduce the population (recreational hunting hasn’t reduced the population anywhere to our knowledge), but it will reward those who have illegally relocated Sambar and other deer to new areas.

The VNPA would like to see a clear justification for any proposal to increase the areas available to recreational deer hunters, including an assessment of impacts on public safety.

The plan should outline clear approaches to significantly reduce the area occupied by deer in the alpine region, and to reduce the size of populations. The plan should also identify particular areas of high concern, such as rainforest and wetland areas, and how best to approach reducing or eliminating populations in those and other places. We note that, though deer cause considerable damage to rainforest areas in particular, there is no strategy at all to account for deer in the rainforest section of the plan!

The plan should also investigate the use of poison baits to target deer, including the exploration of the most efficient means for targeted administration of baits. Reference should be made to the research on baits for deer currently in progress by the NSW National Parks & Wildlife Service.

In short, the Wildlife Act should be no impediment to taking action against deer in Victoria’s National Parks. There are ample opportunities for deer hunting outside parks, and any

extension of areas for recreational hunting of deer will only entrench public perceptions that deer are given protection in parks for the benefit of hunters.

There are many **other pest plant and animal** issues that require park management action, and many of these are mentioned in the plan, but not with effective control methods identified. Treatments for pigs, goats, rabbits, broom and many other pest species are given little or no clarity.

Importantly, the plan lacks any clarity around rapid action for new pest invasions, and/or new populations of existing pest plants and animals. This is a pity as, for example, Parks Victoria has done very well in managing **Hawkweeds** on the Bogong High Plains. This could be cited as a model for rapid intervention in pest plant management, and the need for ongoing vigilance. The plan should articulate a strategy for identifying, and quickly dealing with new invasions.

Similarly, Parks Victoria's control program for **Grey Sallow Willow** on the High Plains demonstrates the importance of a well-advised strategy, and professional contracted help supported by a well-managed volunteer program.

Importantly, pest control management requires planning well beyond park boundaries. There should be a clear identification of existing useful alliances in this regard, and an identification of where co-operative programs need to be improved.

It would also be useful to give voice to a number of necessary **biosecurity measures**, such as the introduction of a 'permitted list' for imported species, replacing the current, inadequate, 'prohibited' list. The current **Senate Inquiry into Environmental Biosecurity** should identify, in its final report, some useful actions to include in the plan.

Two reports, whose recommendations warrant inclusion in the plan are attached as appendices to this submission. They should also be included in the plan's bibliography. They are:

- *An assessment of the Weed Management Program in land managed by Parks Victoria*. Biosis Research, March 2008
- *Control of Invasive Plants and Animals in Victoria's Parks*. Victorian Auditor General's Report, May 2010

For example, the Biosis report noted (p. 24) that the information about weed control programs/methods was generally not available in park management plans, nor in other subsidiary park management documents: *"None of the parks we visited had a specific weed control strategy document."* It went on to say that the monitoring of the natural values of an area subject to weed control was important, and that it was necessary to: *"Enhance the skills and knowledge of rangers in identifying and monitoring natural values that may be impacted by weed control activities"*.

In other words, weed control is about restoring the invaded ecosystem, not just getting rid of the invader. This need for this approach should be made clear in the plan in, say, the case of managing the considerable infestations of **Broom**. Cut and paste treatment of Broom may be expensive and laborious, but it is effective, particularly in small and/or outlying infestations, and unlikely to have a severe impact on the underlying natural systems. Blanket spraying, on the other hand, may be the cheaper option, but can have considerable impact on native species as well.

The plan should make management of natural systems the clear objective of pest plant and animal management. The 'Area Treated' for weeds (draft plan p. 37) makes no reference to the condition of EVCs involved, and therefore should not be the 'measure' in the plan.

Other weeds that deserve mention in the plan, and an assessment of current treatment options for them, include Soft Rush, Lotus, Ox-eye daisy, Thistles, St John's Wort, Sweet Vernal grass, and Water Forget-me-not.

## 7/ Fire management

There are some very welcome statements in the plan in relation to fire management, including that *"growth stage diversity and long-unburnt areas are particularly rare in the planning area"* (p. 45).

However it remains a problem that the plan perpetuates a significant failure in fire management in Victoria: **the FOPs process** (see p. 43) relies entirely on just one tool for fire management – fuel reduction burns.

The VNPA has long held concerns about the level of planned burning in Victoria, and the justifications given for the Fire Operations Plans.

In short, the level of burning is dictated by the 5% annual burn target recommended by the Victoria Bushfires Royal Commission (VBRC). However we note that in the last three reports from the VBRC's Implementation Monitor, Neil Comrie has strongly advised that the target be reconsidered, because it is unachievable and counterproductive. He says in his last (and final) report that it "will not necessarily reduce the bushfire risk to life and property, and may have adverse environmental outcomes".

Further, Mr Comrie also pointed out that the VBRC's recommendations were not to be taken in isolation from each other. That means that Recommendation 56, to burn 5% of public land annually, should be considered in the context of other recommendations that are also designed to save lives, such as:

- **VBRC Recommendation 57**, which asks for an annual report on "prescribed burning outcomes in a manner that meets public accountability objectives". Although not specifically mentioned in Rec 57, "public accountability" would clearly include the effectiveness of the burn program, especially the cost-effectiveness of the program in reaching the prime objective of the program: saving lives. There has never been a public assessment of the actual effectiveness of the program, despite outcries from the scientific community. We believe it is high time for an independent assessment of the cost-effectiveness of the burn program as a tool to save lives, and an independent assessment of its impacts on biodiversity.
- **VBRC Recommendation 4**, which asks for the "encouragement of personal shelters around homes". This recommendation emerged after the urgent call by the VBRC, in its earlier interim report, for the development of an Australian Standard for home bushfire shelters/bunkers. As far as we can see, there is no material widely distributed by DEPI that advises house/lodge owners to install bunkers, even though well-designed bunkers clearly save lives and avoid the high risk of trying to flee a fire.
- **VBRC Recommendation 20**, which stresses the importance of rapid despatch of aircraft. While aspects of this recommendation have been adopted, and in many instances DEPI's capability for rapid attack has been demonstrated very successfully, there have been other instances when aircraft have not been

available, rendering the call for staff to be 'on standby' somewhat purposeless. FOPs should include the need for a rapid attack capability appropriate to the area concerned.

- **VBRC Recommendation 1**, which asks that "local solutions are tailored to and known to local communities through local bushfire planning".

In other words, fire operations planning should happen at a local level, and should consider ALL of the available tools to best achieve public safety and biodiversity protection. That is, the FOPs should consider all of the relevant VBRC's recommendations and also any further knowledge that has emerged since that time.

The Alpine region is one region where fuel reduction can be considered to be fairly ineffective in the case of severe fire conditions, partly because of the steepness of the slopes, and partly because many ecosystems, such as the Ash forests, are difficult or impossible to burn and certainly can't be burnt frequently.

In this context, both to protect public safety and to protect the vast extent of recently burnt fire-vulnerable alpine ecosystems, the plan should look to the development and deployment of a **stronger rapid attack capability** throughout the alpine region.

In the 2003 fire, around 90% of some 100 lightning strikes were extinguished quickly, but the remaining 10% caused a fire that burnt for months. If an increased capacity of fire crews and aircraft, backed up by the necessary availability of water, were deployed throughout all fire prone regions in summer, then such fires might be stopped from occurring so often – something fuel reduction programs can't achieve. That will cost money, but the cost of fighting large fires, and the cost to the community, is considerably larger (the Black Saturday fire is estimated to have cost Victorians over \$4 billion).

Many important studies and reports have emerged since the VBRC's recommendations in 2010, and they should be clearly informing any FOPs in the state.

For example, five leading fire behaviour scientists in Australia, Canada and the USA have demonstrated that managing the ignition point of a fire is more effective in reducing the extent of fire than fuel reduction. Managing the ignition point can happen through a combination of means, such as increased capacity for rapid attack at the source of a fire, by closing public access to remote areas during high fire danger days, and also through public education.

And other published papers from leading Australian fire scientists and ecologists convincingly show that fuel reduction burns are most effective when performed close to the assets they are meant to protect. This is the sort of strategic effort – small, difficult and expensive local burns – that Neil Comrie says is less likely to happen when managers are struggling to sign off on a large area target.

Other studies are showing us that we now have very little long-unburnt bush left in Victoria, and that the impacts on native wildlife are serious and growing. Victoria's 2013 State of the Environment Report raised concerns about the level of burning across the State, saying that *"40% of native vegetation [was] estimated to be below minimum tolerable fire intervals"*

already, that there is only around 3% of very long-unburnt bush left, and that many species were at risk.

Importantly, in regard to the environmental impacts of planned burning, we note the statement in the last line of p. 15 of the VBRC's Final Report Summary, which calls for "... *more informed and scientifically-based decision making [for] prescribed burning regimes that meet conservation objectives as well as accommodating bushfire safety considerations*". In other words, while public safety is the prime objective of fire management, the VBRC saw that protection of biodiversity is also an objective that should be achieved. And in the context of the alps, the protection of water supplies is also a critical objective.

In short, we believe that the current FOPs process, which appears to be driving the recommended actions in the draft plan:

- Puts far too much emphasis on reaching, or even exceeding, the current 5% target;
- Does not adequately engage means other than planned burns that can also, and often more effectively, reduce the occurrence, or the impact, of bushfires (such as managing the ignition point of fires);
- Operates largely within an information vacuum in regards to the important issue of the long-term survival of Victoria's biodiversity.

In relation to this management plan, it should be clearly pointed out that the five Ecological Vegetation Divisions (EVDs) that are most common and indeed characteristic of the alpine region are not at all tolerant to frequent fire. According to David Cheal's *Growth Stages and Tolerable Fire Intervals for Victoria's Native Vegetation Data Sets*, DSE 2010:

- EVD 12 (Tall mist forest) should not experience low or high severity fire for at least 80 years after fire.
- EVD 13 (Closed forest) should not experience low or high severity fire for at least 80 years after fire.
- EVD 14 (High altitude shrubland/woodland) should not experience low severity fire for at least 35 years after fire, and high severity for 50 years.
- EVD 15 (High altitude wetland) should not experience low or high severity fire for at least 90 years after fire if peat has been burnt
- EVD 16 (Alpine treeless) should not experience low or high severity fire for at least 55 years after fire

And notably, the TFIs above are based on tolerances of vascular plants only, so further precautions must be taken to protect vulnerable fauna and other vulnerable species.

Given climate change predictions for increased extreme fire weather, the need to concentrate fuel reduction burns outside these ecosystems (acknowledged in the draft), and the inevitability that lightning strikes and other ignition events will continue in the alpine region, it is hard to imagine that any management action **other than a top-order rapid attack capability** will genuinely help alpine ecosystems survive fire regimes over the long-term.

The plan should strongly recommend such a capability, and also look at other methods to avoid or control ignition points, such as community education and closing access to remote areas during extreme fire weather.

(Note: David Cheal's *Growth Stages and Tolerable Fire Intervals for Victoria's Native Vegetation Data Sets*, DSE 2010 should also appear in the plan's bibliography.)



## 8/ Climate change impacts

While climate change gets a welcome emphasis in Issue box 3 (p.24) there is no clear path from the issues raised to identified management actions, which you would expect in a management plan.

We note, in Parks Victoria's 'Shaping our Future' strategy, it promises to (p. 14):

- *“use a risk assessment approach to adapt park management, particularly to the impacts of extreme weather events and the changing threats posed by invasive species*
- *take a leadership role in communicating the impacts of climate change on the park system and assist the broader community to understand and adapt to climate change impacts.”*

Unfortunately this promise is not really lived up to in the draft plan.

Some climate management strategies that should be identified in the plan are:

- The fairly radical but important initiative of rehabilitating damaged areas (eg after fire) with different species, or genetic variants of local species, from higher elevations and/or different geographic locations.
- Pre-emptive pest management strategies.
- Identify areas likely to act as climate refugia, such as genetically diverse areas, microclimate areas etc., and give them special management protection.
- Fire management aimed at avoiding fire (see section 7 above)

## 9/ Commercial developments in parks

Given the current climate of encouragement for commercial developments in parks, the plan seems remarkably silent on this issue. However it does surrender to the long-standing push for the walk from **Falls Creek to Hotham**, a push which has long been associated with the need for the walk to be the domain of private operators, possibly with privately constructed 'standing camps'. It also, despite **Mount Buffalo** National Park's long history of flawed commercial developments, flags new commercial developments for the park without any justification.

We do not believe that there is any necessity to construct commercially operated standing camps/huts/lodges or any such facility in the parks because:

- Such facilities will inevitably grow and grow over time, largely due to commercial pressures and/or anticipated commercial benefits (this has been proven time and time again within national parks in Victoria, in Australia and elsewhere in the world)
- Claimed benefits to park management through hypothecated revenue are not, in our experience, supported by reliable evidence. Indeed the opposite is most generally the case.
- Bushfire risks associated with built accommodation are likely to lead to large-scale clearing of native vegetation around such facilities, increasing ecological impacts.
- The servicing of such accommodation can have significant environmental and/or park ambience impacts.
- Private developments will present an ongoing management burden to Parks Victoria.
- Private developments that fail inevitably leave the park management agency to pick up the bill.

### **Attachments to Part 1: General comments**

- a. Williams RJ, Wahren C-H, Bradstock RA, & Muller WJ, *Does alpine grazing reduce blazing? A landscape test of a widely-held hypothesis*, *Austral Ecology* (2006) 31, 925–936
- b. Williamson GJ, Murphy BP, Bowman DMJS, *Cattle grazing does not reduce fire severity in eucalypt forests and woodlands of the Australian Alps*, *Austral Ecology* (2013)
- c. *An assessment of the Weed Management Program in land managed by Parks Victoria*. Biosis Research, March 2008
- d. *Control of Invasive Plants and Animals in Victoria's Parks*. Victorian Auditor General's Report, May 2010

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