

Submission to the Mackenzie Falls (Migunang wirab) Revitalisation project by the Victorian National Parks Association, September 2022.

The Victorian National Parks Association (VNPA) welcomes the opportunity to make a submission on the draft Mackenzie Falls (Migunang wirab) Revitalisation project 2022.

The VNPA has been a community voice for the protection of Victoria's unique natural heritage for 70 years. VNPA is an independent, non-profit, membership-based group, which exists to protect Victoria's natural environment and biodiversity through the establishment and effective management of national parks, conservation reserves and other measures.

The management of the Grampians/Gariwerd National Park is a huge challenge for Parks Victoria and areas like MacKenzie Falls (Migunang wirab) pose an extremely hard management area due to the rise in social media and the like encouraging park visitors to enter areas that were once managed solely for conservation for a better photo or social media post.

This is a prime example of a park being loved to death and native species and ecosystems being degraded by these actions. These actions by park visitors also pose a significant risk to people health and safety. Although increased infrastructure may help in excluding visitors from areas for a period of time, active regulation and an increase penalties would likely have a better outcome for nature and OHS concerns and better help care for park values than just an increase in built infrastructure.

Carparks or national parks?

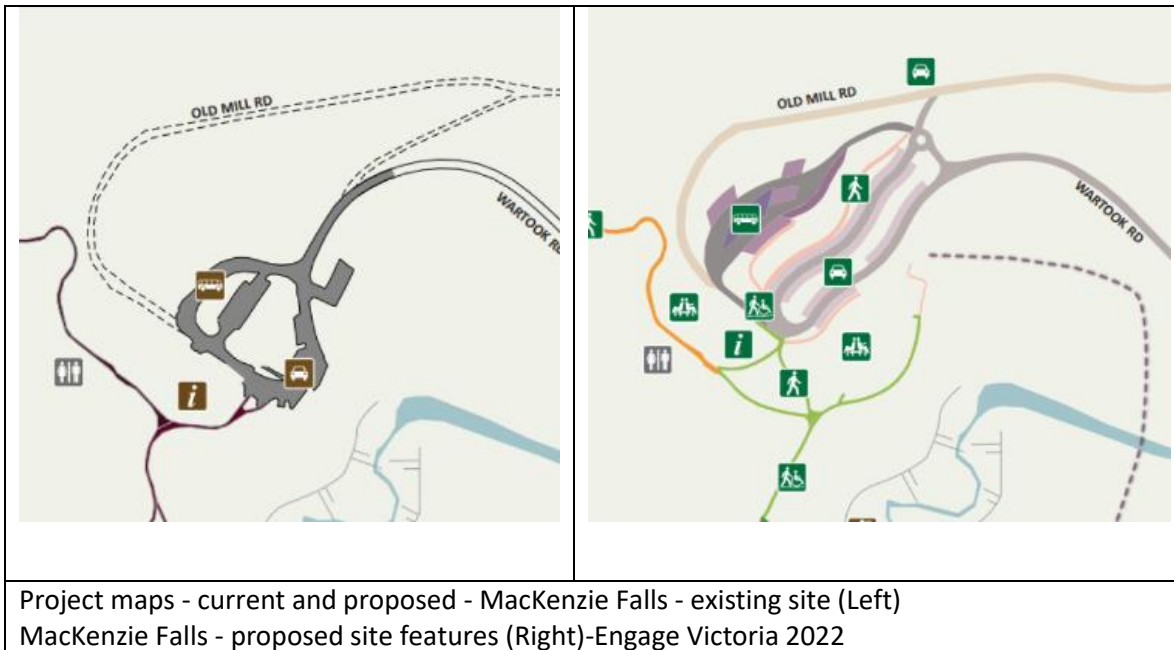
The VNPA sees the loss of remnant vegetation and the fragmentation of habitat as one of the most serious biodiversity issues our state is facing. Allowing our native species the space to adapt to our warming climate is essential for these species to prosper and avoid the threat of extinction into the future. The removal of native vegetation should always be avoided, especially within a national park.

Our national parks and other protected areas play a major role in combating the current extinction crisis we are facing, and in arresting the ongoing decline of native species and vegetation communities. Healthy natural habitats also assist native species to adapt to changes in the environment brought about by a warming climate, bushfires and other disturbances.

The VNPA supports the replacing of existing park infrastructure to meet safety needs, but this should be done within the existing infrastructure foot print but no expansion into new vegetated areas. From the

provided maps on the Engage Victoria (Viewed 29th August 2022) it shows a drastic increase in the size of the car park as well as new tracks.

From the provided information it shows that Parks Victoria have not explored the option of a shuttle bus system, to operate in peak visitor periods, as part of this Revitalisation project. A shuttle bus could pick up park visitors outside of the park where they leave their vehicles and would drop them at visitor nodes across the park including MacKenzie Falls, Reeds Lookout and Zumsteins Historic Area.



A shuttle bus system would reduce the impact of visitor pressure on the park, allow Parks Victoria to make visitors aware of park regulations as well as reducing traffic congestion, parking issues and reduce the threat of cars on local wildlife. This reduces the wildlife roadkill threat, as well as increasing visitor safety and enjoyment.

Parks Victoria should investigate and implement a shuttle bus system for the Grampians/Gariwerd National Park rather than initiating new and expanded infrastructure within the park to cope with increased visitor pressures. Indeed this should be a standard approach to all park management plans.

Shuttle buses are increasingly being used in national parks and protected areas around the world to help reduce visitor pressure and damage.

This was raised in the *Central corridor issues and opportunities* section of the Greater Gariwerd Landscape Management Plan (p 100) "Offering a shuttle bus from here (Zumsteins) to MacKenzie Falls and Reed Lookout", but was absent from the Engage Victoria website information.

Development Creep in parks

The VNPA is deeply disturbed by the line "Potential opportunities for food, drink and visitor information services at MacKenzie Falls and Zumsteins" within the Visitor Experience section of the Engage Victoria website.

The inclusion of food and drink opportunities will encourage “development creep” to maintain the viability of the proposed commercial operations during slow off peak times and lead to a negative impact on the park and its values.

The proposed shop does not align with the National Parks Act or the legislated purpose of a national park. Unnecessary commercialisation such as this has no place in our parks and does not align with government policy that encourages this type of development outside of National Parks.

The guiding principles of the Tourism Leases in National Parks: Guidance Note (The State of Victoria Department of Environment, Land, Water and Planning 2015) states the need to plan potential tourism and recreation facilities outside of the National Parks estate to protect the natural and cultural values and features of the park¹.

The VNPA opposes commercialisation of national parks in the strongest manner as that objective does not easily align with the objectives of the National Parks Act, under which the land is managed and protected.

The VNPA does strongly support visitor access to parks, and recognises the importance of parks to Victoria’s tourism economy.

However access to parks should always be managed in a way that is primarily designed to protect the park. Important principles in this regard include:

- Keeping significant infrastructure outside the park
- Avoiding any situation where existing or new infrastructure is likely to expand due to visitor demand, a management problem commonly known as “development creep”.
- Removing existing intrusive or damaging infrastructure wherever possible. (This is now an increasingly common strategy in USA parks, for example.)
- Directing visitor traffic to areas that can best accommodate that impact.
- Ensuring tourism authorities and agencies are well informed of the fundamental principles of park and protected area management, so that tourism proposals are aligned with park management objectives at the outset.

PV should investigate the installation of water fountains for park visitors and encourage them to bring their own drink bottles into the park and take them home with them, instead of installing a tuck shop that would no doubt add to the litter load within the park and work against the objectives of the National Parks Act and Parks Victoria Act.

The purpose of a National Park

While common sense alone would dictate that any native vegetation giving necessary support to native plant and animal species should be managed with the utmost care, there is a considerable raft of legislation that unambiguously mandates diligent care. Importantly, this clearly raises the bar in relation to any planning of replacement or new infrastructure in national parks.

The objectives of Victoria’s *National Parks Act 1975* include (with our added emphasis):
-the preservation and protection of the natural environment, including wilderness areas and remote and natural areas in those parks

¹ Tourism Leases in National Parks: Guidance Note. The State of Victoria Department of Environment, Land, Water and Planning 2015

-the **protection and preservation of indigenous flora and fauna** and of features of scenic or archaeological, geological, historic or other scientific interest in those parks
-the study of ecology, geology, botany, zoology and other sciences relating to the conservation of the natural environment in those parks
-the responsible management of land in those parks
-to make provision **in accordance with the foregoing** for the use of parks by the public for the purposes of enjoyment, recreation, or education and for the encouragement and control of that use.

The National Parks Act obliges Parks Victoria to manage the park according to the above objectives, and to prepare a plan of management to achieve those objectives. In addition (if additional clarity was needed), the *Parks Victoria Act 2018* obliges Parks Victoria to: “*protect, conserve and enhance Parks Victoria managed land, including its cultural and natural values. For the benefit of the environment and future generations*”.

While listed threatened species are also covered by national and/or state legislation wherever they might be, that protection is clearly already mandated by the above Acts which protect all species in the park, whether threatened or not.

The Grampians/Gariwerd National Park is also included on the Australian Heritage Council's National Heritage List for its outstanding heritage value to the nation. The listing gives the park added protection under the Commonwealth's Environment Protection and Biodiversity Conservation Act 1999 this listing was based on the diverse natural and cultural values the parks hold and maintain them into the future. The objective in managing National Heritage places is to identify, protect, conserve, present and transmit, to all generations, their National Heritage values.

Biosecurity not considered

No proposals for better biosecurity plans was found on the engage Victoria website even though many of the ecological vegetation communities with the Grampian/Gariwerd National Park are sensitive to pathogens such as *Phytophthora cinnamomi* and invasion by new pest plant species that can both be brought into the park via visitors' shoes, equipment and cars.

Infrastructure such as foot washes, wash down areas for cars and equipment could help limit the spread of pathogens and pest plants and raise the awareness of these issues and potential impacts to the park to visitors. There is a need for better biosecurity across the whole park prior to the installation of any new infrastructure.

Native vegetation loss in protected areas

Any proposed project within a national park should make public at this point in the consultation what percentage of native vegetation would need to be cleared to implement the project, including the Ecological Vegetation Classes (EVCs) and their bioregional status.

A process showing how Parks Victoria has Avoided and Minimised damage and loss of native vegetation should also be supplied early on in proposed plans instead of Parks Victoria relying on the *Procedure for the removal, destruction or lopping of native vegetation on Crown land* (DELWP 2018).

The use of the Procedure for the removal, destruction or lopping of native vegetation on Crown land (DELWP 2018) in building new infrastructure in parks is leading to an overall loss in native vegetation across the

protected area estate and “counterbalancing” that loss with management actions that are already obligations of park management, such as pest plant and animal control.

Parks Victoria should show an actual process where it has avoided and minimised damage and loss of native vegetation for this project, and observe the principle that in a national park “avoiding” should be the overriding objective.

It is unacceptable to keep losing native vegetation within Victoria’s protected areas estate, especially within national parks.

Interpretive signage

The VNPA fully supports an increase and updating of interpretive signage across the parks estate that will help educate park visitors on the unique plants, animals and ecosystems that call the park home, and stories on how the park was created, how it is managed and why.

Telling the story of protected area management in a high use area such as Mackenzie Falls (Migunang wirab) can help better educate park visitors about why we have national parks, what values they are legislated to protect and how Parks Victoria does that and how they can help by sticking to existing walking tracks and abiding by parks regulations.

The VNPA also supports the renaming or co-naming of existing areas with the traditional names from Traditional Owner groups in full consultation and support from those communities. We also support sharing of traditional knowledge via interpretive signage if it is being led by Traditional owner groups and is respectful of their cultural processes and beliefs.

If you need any more information please contact Jordan Crook on 0401635573 or jordan@vnpa.org.au.

Thank you



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