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Beach in Wilsons Promontory National Park. PAUL SINCLAIR

**SUBMISSION TO**

*Land Management Plan –  
Wilsons Promontory*  
and surrounding parks and reserves  
June 2023

**Victorian National Parks Association**

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## **Submission to the Landscape Management Plan - Wilsons Promontory National Park and surrounding parks and reserves by the Victorian National Parks Association, June 2023**

Thank you for the opportunity to provide information and knowledge into the Landscape Management Plan for Wilsons Promontory National Park (WPNP), Wilsons Promontory Marine National Park, Wilsons Promontory Marine Park and Marine Reserve, Corner Inlet Marine National Park and the Seal Islands Wildlife Reserve.

The Victorian National Parks Association (VNPA) is an independent member-based organisation, working to improve protection of Victoria's biodiversity and natural areas, across land and sea. VNPA has been actively working to protect Victoria's biodiversity for over 70 years, with a long history of advocating for Wilsons Promontory National Park.

We note that all the areas are managed under the *National Parks Act 1975* except for Seal Islands Wildlife Reserve which is managed under the *Crown Land (Reserves) Act 1978*.

VNPA welcomes the updating of the Wilsons Promontory National Park Management Plan and incorporation of surrounding parks and reserves into a landscape management plan.

We note the growing threats of climate change, invasive species and increasing visitation to the parks and reserves. These pressures are causing a decline in the ecological health of the park, species decline and loss, and an overall loss of park values.

Wilsons Promontory National Park was first designated in 1898, and was one of the earliest designations of a national park, not just in Victoria and Australia but in the world. The reservation of The Prom as a national park was largely the result of campaigns by the Field Naturalists Club of Victoria, which recognised the park's extraordinary natural values. The Prom was more permanently reserved in 1908 after poor management resulted in increased community pressure.

VNPA acknowledges the Gunaikurnai, Boonwurrung and Bunurong peoples as the Traditional Owners of the area now known as Wilsons Promontory and its surrounding parks and reserves, and honours their continuing connection to and caring for Country.

We support Traditional Owner joint-management of parks and public land for conservation of natural and cultural heritage.



1200 community members gathered at Wilsons Promontory National Park to Protest Development in Parks, 2013

## Summary of prime concerns

This list of concerns is a summary only; the issues are addressed in more detail later in the submission. The list is not exhaustive and does not imply that other issues raised later in the submission are not significant.

1. Current visitation to the Prom is unsustainable, ecologically harmful, a threat to visitor safety and seriously compromises visitor enjoyment, especially in peak periods. The new management plan MUST provide an effective long-term solution to this problem. We believe the solution will at least involve a shuttle service for visitors, initially in peak periods.
2. The prime objective of the park is the protection of its natural and cultural values. In this respect, we note that the 'Centre of Excellence' for park management promised in the 2002 management plan has not yet eventuated. The construction of the Yanakie Isthmus fence provides an ideal scenario for the development of a park management research and training institute at the Prom, in partnership with tertiary institutions and Traditional Owners. The Prom has a long history of ecological research that can, and should, be built on and consolidated. Management based on sure knowledge is likely to be the most cost-effective.
3. The new management plan should clearly address climate change impacts, especially in relation to future invasive terrestrial and marine species, fire impacts and sea level rises.
4. Fire management is particularly problematic, given the extensive recent fire history at the Prom. While fire management is ostensibly the responsibility of DEECA (and FFMV), the plan should recognise the inherited knowledge of fire management at the Prom, and articulate how the Prom's managers should advise and work with DEECA's fire planners.
5. The marine parks need a far greater emphasis than is indicated in the provided documents on the Engage Victoria site.
6. Tidal River should, as rapidly as possible, be equipped to be a carbon neutral operation. One of Victoria's most important national parks should also be a case study of carbon neutral operation. The current trucking in of diesel to generate Tidal River's power supply, for example, is an embarrassment.
7. Management prescriptions in the new plan should include achievable targets.
8. Many of the above issues were not sufficiently (or not at all!) addressed in the Engage Victoria consultation pages. They should be addressed in a renewed interim consultation, so people have a chance to offer useful feedback. In particular, the community has not been sufficiently advised of the key legislative obligations the new plan must fulfill.

## Management of visitation solutions and strategies missing from documents

The proposed Landscape Management Plan for Wilsons Promontory National Park (WPNP), Wilsons Promontory Marine National Park, Wilsons Promontory Marine Park and Marine Reserve, Corner Inlet Marine National Park and the Seal Islands Wildlife Reserve will guide the management of these special places for the next 15-20 years, yet one of the biggest issues facing these places is touched on but not dealt with adequately: increased visitation.



Traffic on a busy summer day (Page 10) Wilsons Promontory Landscape Management Plan – Discussion Guides (Parks Victoria) May 2023

The 2002 Management Plan for Wilsons Promontory National Park sets out caps on visitor numbers, with a maximum of 800 visitor vehicles permitted into the park on any one day,<sup>1</sup> as well as the Land Conservation Council (LCC) noting in 1991 that there was scope to reduce the number of vehicle tracks, and that there may be a need to control visitor numbers at the more popular campsites to reduce environmental impacts<sup>2</sup>.

The issue of increasing roadkill impacting the loss and suffering of wildlife has also been raised for many years in the Prom, and these numbers may increase with the installation of the predator proof fence.

The lack of planning of management of visitation within the parks is leading to a significant negative impact on visitors' experience in the park.

There is a strong need for Parks Victoria to lay out a discussion on visitation management, its impact on the park and its values and strategies to reduce that impact prior to the publishing of the Draft Landscape Management Plan. This is relevant for the Prom and surrounding parks and reserves, but particularly Wilsons Promontory National Park.

This includes boat access to remote and wilderness areas, and anchoring in bays and inlets, and may need further regulation.

This discussion must lay out strategies and ideas to the community for managing increasing park visitation numbers impacting on the park's values and ecology, bushfire safety, limits of

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<sup>1</sup> Page 4. Wilsons Promontory National Park Management Plan (2002, Parks Victoria).

<sup>2</sup> LAND CONSERVATION COUNCIL WILDERNESS SPECIAL INVESTIGATION FINAL RECOMMENDATIONS November 1991

Tidal River infrastructure and legislative requirements under the *National Parks Act, Flora and Fauna Guarantee Act, Environment Protection and Biodiversity Conservation Act 1999* and other legislation.

**The prime legal requirements for national park management are missing from the provided documents**

The distinct lack of clarity of management objectives under the *National Parks Act 1975*, under which a majority of the areas covered by the proposed Management Plan are managed, is disappointing and potentially misleading to the public.

National and state park management plans are specifically mentioned in the *National Parks Act* under Division 1, Section 17 (2) (a-d). These sections (essentially a more explicit writing of the 'Objects' of the Act) are the management features the legally required management plan is expected to achieve:

*(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) consult, as far as is practicable, with the Secretary to ensure that, as far as is practicable, appropriate and sufficient measures are taken to protect each national park and State park from injury by fire;*

*[then ... (ba) a series of water provisions]*

*(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, which may be included as part of a land management plan within the meaning of Division 4 of Part 3 of the Parks Victoria Act 2018.*

The Objects of the *National Parks Act* are the basis of management of the parks estate and must guide all management of our parks, to not have them within any of the guiding documents is perplexing.

The Objectives of the *National Parks Act* must be used as the basis of the planning of the updated Management in all public communications.

The Objectives are:

### **Objects of Act**

*The objects of this Act 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;*

### **Further Provisions are made for the Management of Water Catchments and Wilderness Areas.**

No maps were provided to the community of the Park's Management Zones and Overlays that guide the management of the park, and the protection of park values. This must be rectified.

The provided map within the Wilsons Promontory Landscape Management Plan – Information Papers (Parks Victoria, May 2023) *Figure 1: planning area for Wilsons Prom Landscape Management Plan* is illegible and adds no value to the consultative process.

## **Discussion 1: Traditional Owners' Cultural Heritage**

VNPA acknowledges the Gunaikurnai, Boonwurrung and Bunurong peoples as the Traditional Owners of the area now known as Wilsons Promontory and its surrounding parks and reserves and honours their continuing connection to and caring for Country.

VNPA supports further survey work to identify both tangible and intangible sites of cultural significance for Traditional Owner groups.

The 2002 Wilsons Promontory National Park Management Plan suggested the removal of camping sites from areas of cultural significance. VNPA supports these types of measures to protect and respect cultural heritage sites and maintain their cultural fabric.

We support Traditional Owner joint-management of parks and public land for conservation of natural and cultural heritage. We also support the restitution of traditional names for national parks and reserves (and features within parks), in consultation with Traditional Owner groups.

## **Discussion 2: Conservation and The Prom Sanctuary**

With the past Wilsons Promontory National Park Management Plan being published in 2002 as well as the Wilsons Promontory Marine National Park in and Corner Inlet Marine National Park Management Plan 2006 and 2005 respectively, many changes have taken place in public land and sea use. Emerging threats such as climate change and fire in the landscape becoming more present, other threats increasing in the severity of their impact (such as feral deer), and rapidly increasing visitation are management issues, must be seriously addressed in the new plan.

Critical marine issues include marine pest species (including potential climate-induced pest migrations), illegal fishing (including commercial fishing), and inappropriate boating operations.

There are also significant pest plant and animal issues on the Prom's surrounding islands. While we note that some good work has been done there, the islands tend suffer an 'out of sight, out of mind' problem. Management of the marine parks, and the islands, necessitates the adequate resourcing of the Prom with sufficient skilled staff and sufficient equipment (including watercraft).

The reintroduction of fire management practices including cultural burning must be based off a foundation of past fire use levels, this must include site specific data such as core drilling and First Nations knowledge of fire practices, when known.

All reintroduction of fire must be closely monitored for impact on species richness and ecosystem diversity, with findings published publicly through the peer review process to ensure thorough public and scientific oversight.

A commitment of long-term monitoring and publishing of data is required not only for fire but also in line with the predator proofing of the WPNP.

The impact of climate change, and a series of bushfires over the last 20 years, plus growing impact of invasive plants, animals and pathogens, highlights the need to protect all remaining native vegetation within the WPNP and surrounding reserves and halt any planned further removal of native vegetation within these areas, be it for more car parking or accommodation.

New infrastructure projects must be placed outside of the park on already cleared country.

With a 1.5-4 degree rise in temperatures, large amounts of existing park area will go underwater and/or change Ecological Vegetation Classes, as shown in Figure 1. Figure 1 shows predicted sea levels rises based on Climate Central's sea level rise and coastal flood maps, and appears in peer-reviewed science in leading journals<sup>3</sup>. The new plan must accommodate management strategies to deal with these predictions.

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<sup>3</sup> Coastal Risk Screening Tool, Climate Central. <https://coastal.climatecentral.org/>

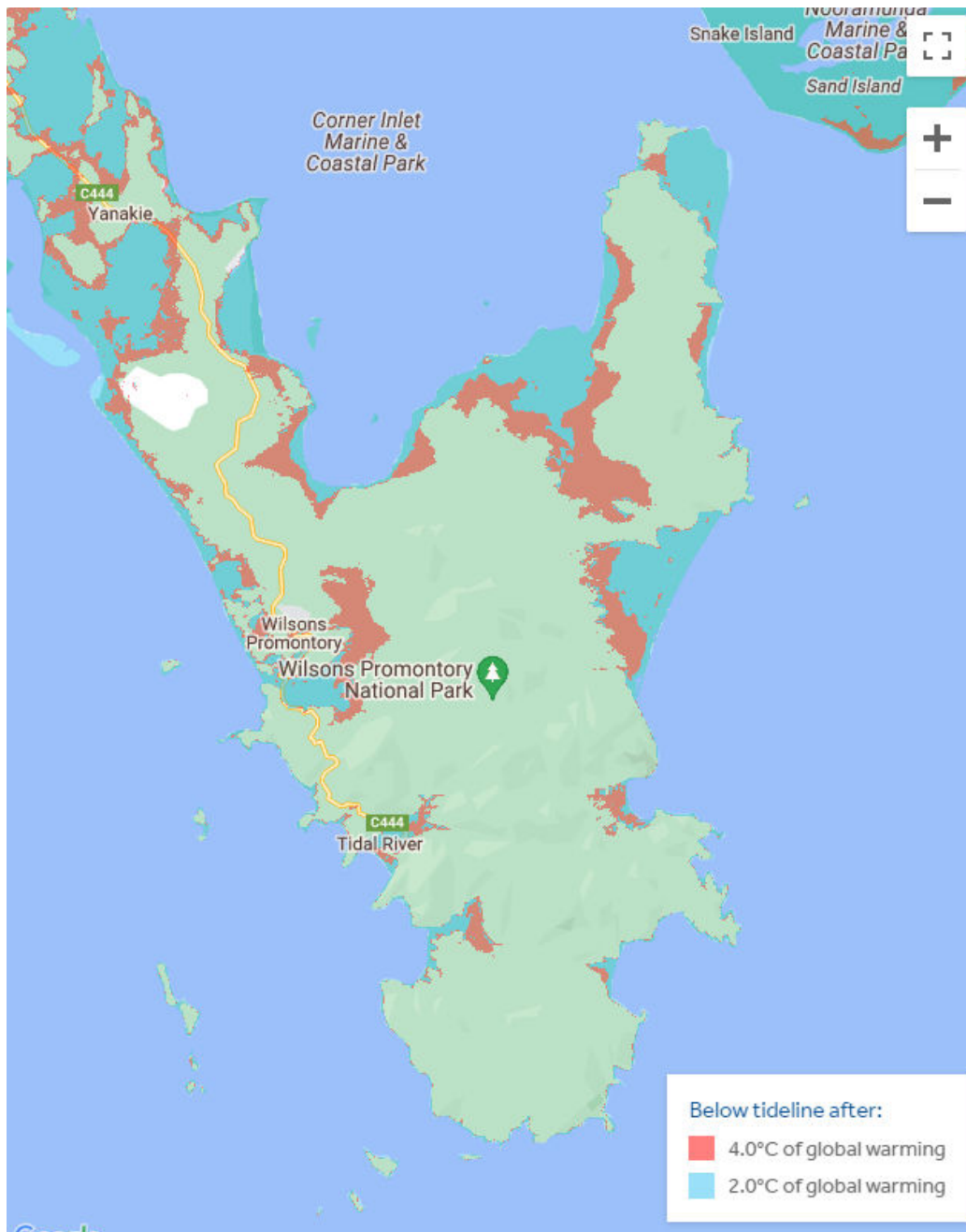


Figure 1. Coastal Risk Screening Tool assessment of Wilsons Promontory National Park and surrounding reserves. June 2023

VNPA supports the proposed main outcomes of the Prom Sanctuary as shown in the Discussion Papers (May 2023) but would like to see the addition of long-term monitoring of the Prom, building data sets of pre- and post-fence construction, and allowing for land managers to make changes to management if outcomes are not being met or adverse outcomes are detected on flagship species and ecosystem types. Monitoring should include both terrestrial and marine ecosystems.

We note the excellent work, founded on careful experimentation and monitoring, for the grassy woodlands rehabilitation of the Yanakie Isthmus; it should be a model for work across the parks.



This will align with the 2002 Wilsons Promontory Management Plan which had a management direction for establishing a 'centre of Excellence for Park Management' to help research, monitor and teach park management<sup>4</sup>.

As highlighted in the 2002 Management Plan:

*Monitoring may help to determine whether change results from natural processes or is induced by human activity. The information gained can be used in the review and improvement of management techniques. An efficient, effective and ongoing monitoring program is needed to provide baseline data, and for subsequent periodic assessments and evaluations.*

The need to work towards a higher level of biosecurity at the Prom and its surrounding reserves is also warranted, but is missing from the supplied documents. This includes not just visitor education of cleaning gear and shoes before entering remote and intact areas, but also within high use walking areas area. This would include the supplying of foot wash stations, closing of illegally made tracks and making mandatory the cleaning of camping gear prior during the booking process.

This will help slow the introduction of pest plants and pathogens, and help stop their future introduction, as well as help educate the greater public on biosecurity and its importance across the parks estate.

### **Discussion 3: Visitor experience and social connections**

The importance of the Prom in a social context should be recognised. This amazing place was one of the first national parks established in Victoria after passionate advocacy by field naturalists in the 19<sup>th</sup> century. That advocacy has never ceased, and given the ecological significance of the Prom, it will continue in the future.

It also plays a special part in many visitors' lives as a place of regular pilgrimage to camp, walk, observe a certain species of bird or the flowering of wildflowers, while weaving their way through South Gippsland to the Prom country.

Eighty-six per cent of people responding to the Parks Victoria 2022 visitor satisfaction survey indicated that they visit the Prom to access a natural experience and attractions, with a majority (46 per cent) undertaking short hikes and bushwalks of 1-4 hours<sup>5</sup> as that experience.

This highlights the need to manage the Prom with a high level of ecological knowledge and care of its ecological, biological and geomorphological features.

Further development within the park boundaries will jeopardise these values and the ambiance of the Prom enjoyed by a majority of visitors, and any increase in housed accommodation or car parking must be placed outside of the park. We will go into this further in our response to Discussion 5: Managing visitor demand.

We must not kill the goose that lays the golden egg, but manage it in a science-led decision-making way to enhance the biodiversity of the Prom and its surrounding reserves. The Prom's character and

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<sup>4</sup> Page 46, 7.1 Centre of Excellence for Park Management program. Wilsons Promontory National Park Management Plan, Parks Victoria (2002)

<sup>5</sup> Wilsons Promontory Landscape. Management Plan – Discussion Guides, Parks Victoria (May 2023)

ecological integrity must not be sacrificed in the process of constructing recreational facilities that can be experienced elsewhere.

Although many of these developments are being undertaken by Parks Victoria and not private operators, new developments should align with the government policy *Tourism Leases in National Parks: Guidance Note* and the guiding principles and consultation requirements within that document<sup>6</sup>.

Visiting Wilsons Promontory National Park may be first time some visitors have entered and camped at a national park in Victoria, so this is a great opportunity to educate visitors not only of the park's natural and cultural heritage but also the reasons why park regulations exist, to protect our parks for the many and avoid damage by a few.

#### **Discussion 4: Protecting the marine and coastal environment**

It is welcome to see the bringing together of land and sea management into one plan and for marine management be recognised as an important priority. However, we note that the discussion paper does not include a lot detail or give much direction for management priorities to be included in the landscape management plan.

It would be helpful to see further detail on what the management goals or objectives are for the marine areas, and we would welcome some direction prior to a draft Landscape Management Plan being released.

We also question why Shallow Inlet Marine and Coastal Park was not included within the geographic scope, given its proximity to the national park, or Nooramunga Marine and Coastal Park, given that management is undertaken by Parks Victoria by the same rangers as Corner Inlet and Wilsons Prom marine areas. The Wilsons Promontory Marine National Parks and Marine Park Management Plan supports this notion by stating that *'Management of visitor access will be integrated with management of the adjoining Wilsons Promontory National Park and Corner Inlet Marine National Park, Corner Inlet and Nooramunga Marine and Coastal Parks.'*<sup>7</sup>

In terms of threats, it was disappointing to see the discussion paper did not refer to one of the Prom's most extreme threats of marine invasive pests, considering previous efforts that have been undertaken in the past to protect the Prom's waters. Marine pest surveillance monitoring has eradicated incursions of the Northern Pacific Sea Star, and Pacific Oysters from Tidal River.

The Prom is recognised as an international biodiversity hotspot, and rightly so. Victoria's largest marine national park is unique for its colourfully lined caves, sponge gardens, kelp forests, fish life and invertebrates.

Parks Victoria's *Integrated Monitoring Program, Technical Report* for Wilsons Promontory Marine National Park acknowledges that invasive pests are an extreme risk to the marine national park. Other threats including illegal fishing, oil spills and increasing sea-surface temperatures are threats to park values.

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<sup>6</sup> Tourism Leases in National Parks: Guidance Note, DELWP (2015)

<sup>7</sup> Wilsons Prom Marine National Park and Marine Park Management Plan. [www.parks.vic.gov.au/-/media/project/pv/main/parks/documents/management-plans/resource-library/wilsons-promontory-marine-national-park-and-marine-park---management-plan---](http://www.parks.vic.gov.au/-/media/project/pv/main/parks/documents/management-plans/resource-library/wilsons-promontory-marine-national-park-and-marine-park---management-plan---)

The monitoring done as part of this study also identifies the decline in several key species of fish, macroinvertebrates and, significantly, for macro algal species, with the underlying drivers of decline unclear.

Increased sea-surface temperatures have not been studied and needs further work to understand their impact of species within and outside of the marine national park, similarly to the species that we know are in decline. This highlights the need for ongoing, long-term monitoring to further understand the changes and guide management responses.

The Wilsons Promontory Marine National Parks and Marine Park Management Plan has effective management priorities and goals that should be used as part of this planning process.

It is our view that the Landscape Management Plan should address the following priorities as core parts of its direction for marine national parks, sanctuaries and the islands (not limited to, but include):

- Broadening the scope to include at least Shallow Inlet, and consider Nooramunga Marine and Coastal Parks as part of the Landscape Management Plan.
- Marine pest surveillance, early detection and monitoring efforts, especially with increased boat traffic around the Prom, shipping and recreational use of kayaks and other water toys.
- The continuation of a comprehensive science monitoring program and investment as one of Victoria's most important climate refuge areas for marine wildlife.
- Marine education programs for park visitors on the values and how to protect the park's values.
- Investment of in-water expertise and training for rangers to undertake marine monitoring.
- First Nations cultural heritage protection programs.
- Guidelines to limit and/or manage impact of future Licensed Tour Operator licenses and visitor use in general on the marine and coastal environment.
- Monitoring of boating traffic and no access to cruise ships.
- Compliance program, including roster for patrols of the marine national parks for fishing activity that is adhered to, and implemented by, the rangers.
- Management statements, goals and objectives that have measureable actions and reporting frameworks associated with them for accountability on how management is progressing.

The Wilsons Promontory Marine National Park and Marine Park Management Plan also refers to various ECC recommendations. For both these recommendations, as well as the broader set of priorities it would be useful to review these and report on progress for each of them, in order to shape the updated priorities for this planning process.

Some of the ECC recommendations listed include:

*R13 Further research to be undertaken on biological community composition and structure, both within and external to marine protected areas, with an emphasis on assessing the impacts of harvesting marine fauna.*

*R14 Assessments to be made and strategies developed for protection of vulnerable or threatened marine species and communities, using the provisions of the Flora and Fauna Guarantee Act 1988 (Vic.) as appropriate.*

*R18 Measures to be implemented by responsible agencies to reduce the risk of marine pest species arriving in Victoria, and to ensure a rapid and effective response in the event of an introduction.*

## **Discussion 5: Managing visitor demand**

Disappointingly, the provided documents don't highlight the ecological impact that increased visitor pressure has on the parks, their wildlife and their values, or set out any ideas or examples of reducing this growing pressure on the parks and their amenities.

There are no estimates provided of predicted visitor numbers over the next decade or two. Visitor planning cannot be meaningfully prescribed without authoritative visitor projections.

Increased visitation come with increased impact; loss of native vegetation (e.g. parking along roadsides damages native flora), car strikes of wildlife, spread of disease and pathogens such as phytophthora, overuse of existing tracks leading to compaction and erosion, are just a few examples.

In past Wilsons Promontory National Park Management Plans (1997 & 1987) the issue of increased car strikes on wildlife was raised due to the increase in visitor numbers. The provided documents don't provide any insight into capping numbers of visitors during peak periods, or reducing road pressure via the use of shuttle buses from outside the park into park node areas.

Any increase in the capacity of built accommodation would place pressures on infrastructure and environmental amenity. This was recognised in the 2002 Management Plan<sup>8</sup> but has so far been neglected from the documents.

There is a strong need (reflected in government policy) to have future development outside of park boundaries. This would reduce pressure on the park and enable surrounding land holders to gain business from camping and shuttle bus services.

The park alone cannot, and should not, be placed under increased pressure to meet this growing demand; there is an ecological and social need to look outside of the parks for ways to reduce this growing impact. There is a sensible and welcome legal requirement to accommodate park visitors, but that is subject to other objectives in the Act, most specifically to:

*Preserve and Protect the natural environment including wilderness areas and remote and natural areas in those parks, 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

*for the study of ecology, geology, botany, zoology and other sciences relating to the conservation of the natural environment in those parks.*

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<sup>8</sup> Wilsons Promontory National Park Management Plan, Parks Victoria (2002) p36.