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NATIONAL PARKS  
ASSOCIATION  
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Barmah Wetlands, Barmah National Park, Yorta Yorta Country. EUAN MOORE

**SUBMISSION TO**

*Stage one feedback process for  
the Murray River Adventure  
Trail (MRAT)*

**Victorian National Parks Association**

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## **Submission to the Murray River Adventure Trail Stage one feedback**

October 2024

Thank you for the opportunity to provide feedback on the Stage one feedback process for the Murray River Adventure Trail (MRAT).

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.

While VNPA supports and encourages people to visit and enjoy our national parks and protected areas, this visitation should not result in the degradation of the local ecosystems and loss of critical habitat for native wildlife. Most park users would also be concerned if their visiting of an area was facilitated by the damage and loss of critical habitat.

### **Background**

We understand the MRAT is being funded by a \$10.3 million from the State Government to support the idea from the Murray Region Tourism Destination Management Plan (2012), commissioned by Murray Regional Tourism.

Many of the tracks and campsites planned in the MRAT process are informal tracks and campsites that will be formalised as part of this process. VNPA welcomes this but raises concerns about the need to calculate the area of native vegetation lost and possible re-aligning away from ecologically required values such as large and hollow-bearing trees, native orchids and waterways and bodies including ephemeral ponds and gilgais.

The MRAT will cover Barmah National Park, Gunbower National Park, Lower Goulburn National Park, Echuca Regional Park, Echuca Historic and Cultural Features Reserve and the yet to be legislated Murray River Park.

We acknowledged the lands and waters on which the MRAT is planned on the lands of the Wemba Wemba and Yorta Yorta peoples.

## **Making an informed contribution**

Parks Victoria has stated that “*Extensive cultural and environmental assessments will be undertaken to ensure this is done appropriately*”.<sup>1</sup> However, these reports have not been made public during the community consultation, even though the assessments seem to have been done between 2020 and 2022, according to the Parks Victoria website.

It remains unclear how much of the proposed track will be existing and how much will be new track requiring the loss of native vegetation within the national parks and native vegetated areas.

VNPA generally supports the upgrading and defining of tracks in this region, when done on exiting trails and when it doesn't harm existing tree roots or badly impact local hydrology. Protocols must also be made public to mitigate the impact of Threatening Process under Victorian law: *The spread of Phytophthora cinnamomi from infected sites into parks and reserves, including roadsides, under the control of a state or local government authority & Use of Phytophthora-infected gravel in construction of roads, bridges and reservoirs* under the FFG Act.

To make an informed decision, these documents should be made public to understand the impact of the project, the number of trees and hectares of native vegetation set to be removed.

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<sup>1</sup> Murray River Adventure Trail, <https://www.parks.vic.gov.au/projects/northern-and-central-victoria/murray-river-adventure-trail>

## **Objectives of the National Parks Act 1975**

A key feature of the national parks estate in Victoria is the control and management of parks by Parks Victoria, an independent public authority with management responsibilities and expertise across parks and reserves in Victoria.

Parks Victoria is accountable to the Minister, subject to statutory responsibilities and empowered with functions necessary to meet the objectives set out in the *National Parks Act*.

Parks Victoria's responsibilities for management of national parks and other reserves go well beyond a limited engagement as a service provider, particularly following the important reforms to its role introduced by the *Parks Victoria Act*.

The *National Parks Act* is very clear in its Objects on how parks must be managed and cared for:

### **4 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;

With such a large investment into built infrastructure, with a decline in the ecological health of the parks, it must be matched in the ecological restoration of the proposed work site.

This would meet the objectives of the land tenure and help increase biodiversity in the parks for visitors to enjoy.

The project as it's planned does little to preserve or protect the biodiversity within the parks. It will see an overall reduction in native vegetation cover and habitat.

Developments such as the MRAT must include positive ecological outcomes for parks, and the plants and animals that call them home.

### **Loss of hollow-bearing trees from Victorian native forests**

VNPA holds concerns about the impact of new and upgraded tracks on large and hollow-bearing trees across national parks and public lands.

The loss of hollow-bearing trees in these landscapes will cause the direct loss of wildlife habitat, including Commonwealth and State listed species such as Superb Parrot (*Polytelis swainsonii*) and Squirrel Glider (*Petaurus norfolcensis*).

The installation of new tracks and assets into treed areas increases the need for trees to be removed, due to perceived and actual risk created by the increase in activity under the trees or within their fall zone.

This was raised as a concern in the Warburton Mountain Bike Destination environment effects statement (EES) hearings and the findings of the Advisory Committee. In relation to the installation of new tracks into treed areas, and the resulting cumulative impact of habitat and tree loss, it stated that

*'Uncertainty also remains about the likely extent of tree removal during the operational phase. The hazard potential of trees will remain throughout the life of the Project. As trees age or are affected by fire or illness, they may present a new hazard. The IAC accepts the submission of Parks Victoria that there is a potential for "impact creep" from the lopping or removal of trees necessary to ensure public safety around trails. The potential extent of this impact has not been assessed, and would be difficult to determine when the impacts may be incremental and occur slowly over time<sup>2</sup>.'*

In 2024, VNPA released *Protecting our living legacies: a guide to protecting large old trees on public land*. It brought together arboricultural management techniques, Australian Standards for tree care and management, and the need to keep large and hollow-bearing trees in the landscape for their ecological importance. We have attached the document as an appendix to this report and encourage Parks Victoria to use it when installing new infrastructure into treed areas and managing the impacts on trees.

For the project to remain ecologically sound and respectful, Parks Victoria must commit to not exceeding the bases provisions of the Crown land exemption, as listed in Clause 52.17 of the Victoria Planning Provisions also known as the Crown Land Procedure.

The Crown Land Procedure exempts public land managers from securing like for like offsets and leads to a public land managers to speed past the other requirements of avoiding and minimising damage and loss of native vegetation in developments. Avoidance and minimisation of vegetation loss must be prioritised and clearly documented. If counterbalancing measure are undertaken, only as last resort, they must be done on a like-for-like basis in line with Native Vegetation Regulations.

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<sup>2</sup> Planning Panels Victoria, Warburton Mountain Bike Destination, Inquiry and Advisory Committee Report No.1, 20 June 2022





Map 1. Map of proposed trail alignment supplied by Parks Victoria. VNPA believes the track should align along Headworks Rd to avoid further loss of native vegetation

### **Loss of coarse woody debris from Victorian native forests and woodlands**

The loss of coarse woody debris from Victorian native forests and woodlands is a listed Threatening Process under Victorian state law (FFG Act) driven predominately by firewood collecting or removed due to perceived fire risk.

Coarse woody debris are critical for a range of wildlife including species listed under State and Commonwealth legislation that live within the parks.

During the River Red Gum Forests VEAC Investigation, the Final Report made a recommendation to 'Re-establish habitat crucial to a number of species of woodland fauna; a target of retaining an average of at least 50 tonnes per hectare of coarse woody debris in riverine parks and state forests is proposed (recommendation R36)', the from this recommendation government recognised the need to establish 'wood lots for campers in high visitation areas<sup>3</sup>.'

It is unclear if DEECA and Parks Victoria have established a firewood strategy for campers as recommended in R36 of the River Red Gum Forests VEAC Investigation Final Report.

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<sup>3</sup> Victorian Government Response to A Victorian Government initiative Victorian Environmental Assessment Council's River Red Gum Forests Investigation Final Report, March 2009.

**Firewood strategy for campers**

**R36 That the Department of Sustainability and Environment develop (in the context of management planning) a firewood strategy for campers (outside the solid fuel fire ban period):**

**(a) with a target of retaining at least 50 tonnes per hectare of coarse woody debris across each frontage block, and**

**(b) specifying where wood can be obtained elsewhere on forested public land, as a result of safety works, road clearing, fire protection works or ecological thinning.**

**Note: Campers could also be encouraged to bring wood from home or purchase it from local suppliers prior to entering the park.**

The government recognises the need for campers to access firewood and the need to install permanent fire sites and establish wood lots for campers in high visitation areas.

*Table 1. Victorian Government Response to a Victorian Government initiative, e Victorian Environmental Assessment Council's River Red Gum Forests Investigation Final Report, March 2009.*

With the formalisation of fire pits and camping areas through the MRAT project, Parks Victoria must make clear where wood for campers will be coming from, and how it will maintain the ecological requirements for woody debris in the parks.

The large sum of money invested in the MRAT project should be used to establish woodlots for campers and establish educational interpretive signage around campsites highlighting the impact of firewood poaching has on wildlife and ecosystem functions.

**Degradation of native riparian vegetation along Victorian rivers and streams and habitat fragmentation as a threatening process for fauna in Victoria.**

In quite a few areas along the proposed route for the MRAT project, tracks get close to the top of the river bank, which may lead to issues with erosion as well as fragmentation of habitat.

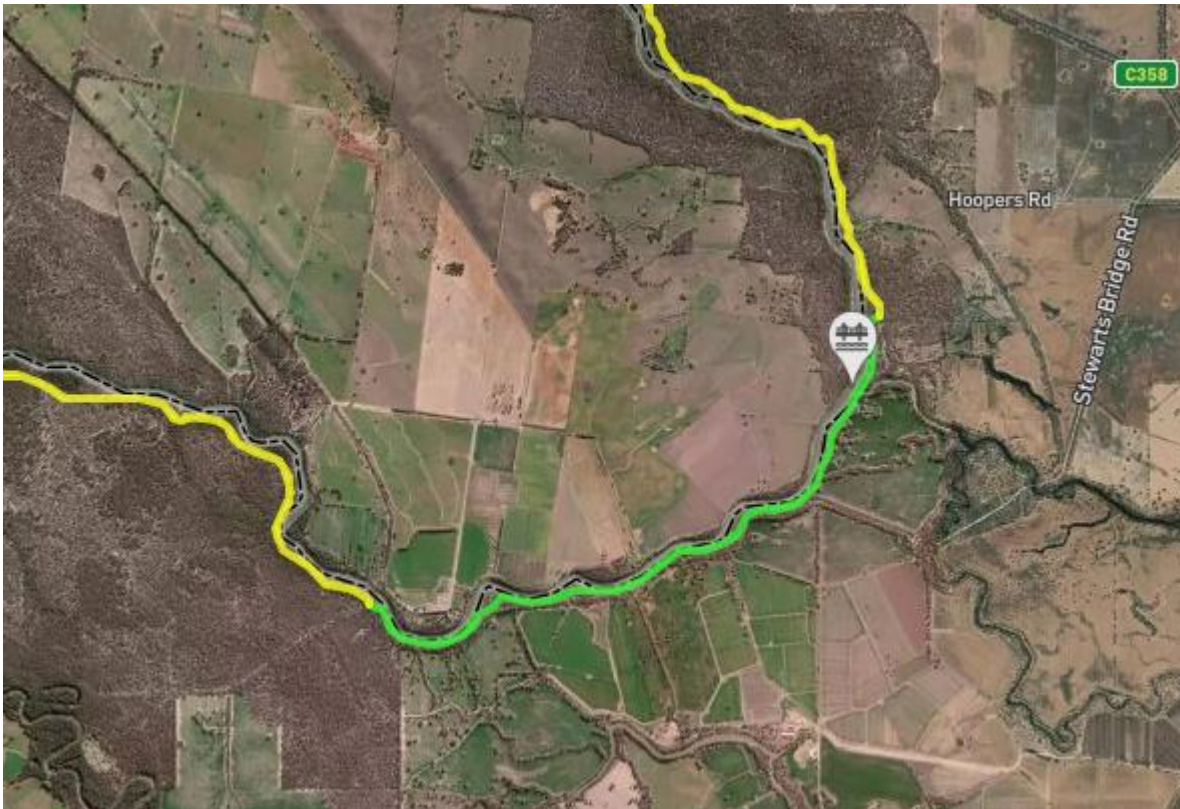
In Map 2, large sections of new track (shown in green) from Stewarts Bridge Road to the Woodbine Drive area is through areas of little native vegetation.

The proposed track stays close to bank edge rather than being established away from the banks or the existing road on Woodbine Drive, this will likely lead to the unnecessary loss of native vegetation and increase habitat fragmentation.

Tracks should be planned first and foremost to avoid the loss of habitat, including avoiding the areas within the Tree Protection Zone of large and hollow-bearing trees to extend their life and usefulness for wildlife.

The track in Map 2 must be planned as far away from the river edge as possible, whilst not leading to any loss of native vegetation.

Degradation of native Riparian vegetation along Victorian rivers and streams and habitat fragmentation as a threatening process for fauna in Victoria is a listed threatening process under the *Flora and Fauna Guarantee Act 1988*.



Map 2. Map of proposed trail alignment supplied by Parks Victoria

### **Gazette the Murray River Parks**

Dotted between the Barmah, Gunbower, Lower Goulburn River and Warby Range-Ovens River, is a series of reserves collectively known as the 'Proposed' Murray River Park, managed by Parks Victoria.

Unfortunately, the park is yet to be formally gazetted by successive the Victoria Governments, leaving the management of the reserves in limbo.

Due to this legislative limbo, we believe cattle are still licensed to graze, trample sensitive wetlands and pollute the river and degrade biodiversity values. An assessment of the MapshareVic website supplied by DEECA in September 2024 found that extensive grazing licences still exist over the Murray River Park. Those maps are attached below.

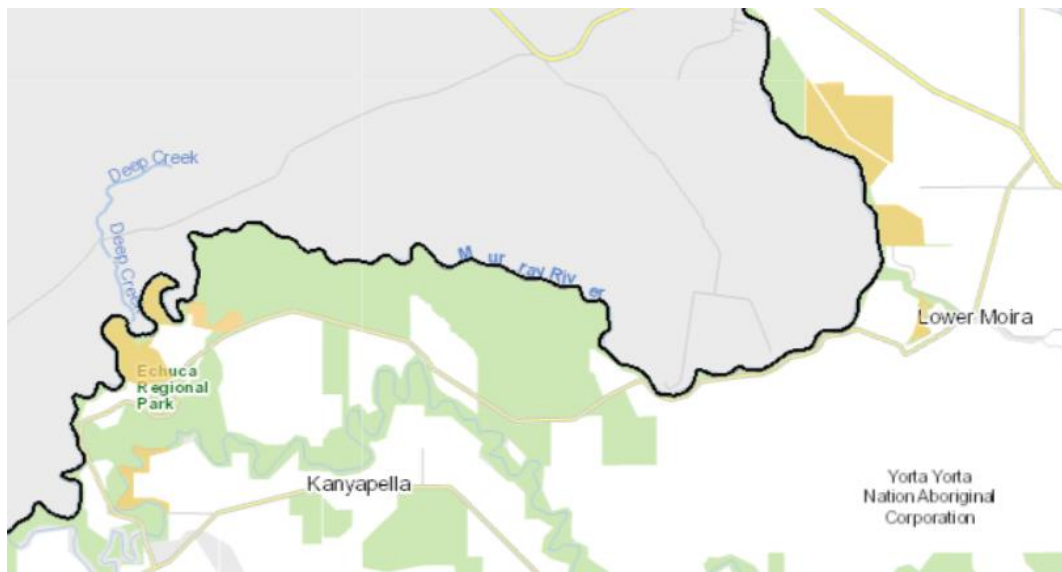
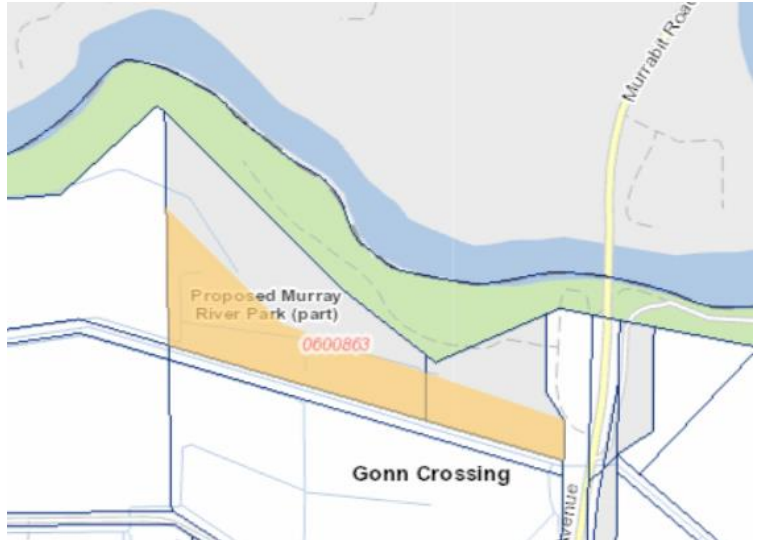
Land set aside for the new park was largely handed over to Parks Victoria to manage, and Parks Victoria initiated a program to phase out cattle grazing in the new park.

Under legislation, cattle grazing licences were to be phased out by 30 September 2014, or when current licences expired, whichever came first. Parks Victoria was part way through phasing out cattle grazing in the proposed Murray River Park when the Victorian Coalition Government re-issued around 200 cattle grazing licences.

With grazing licences still over areas assessed to be the Murray River Park, it is unclear why grazing licences are still over these areas degrading the values people come to visit and enjoy.

Parks Victoria must phase out grazing of these areas as soon as possible and restore the damage done by grazing.





Maps 3,4 and 5. Areas of the Proposed Murray River Park under grazing licence as of September 2024 (DEECA/MapshareVic)

Yours Sincerely,

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