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The Secretary  
Senate Environment, Communications, Information Technology  
and the Arts References Committee.  
Parliament House  
Canberra ACT 2600

### **Submission to the Inquiry into Australia's National Parks, Conservation Reserves and Marine Protected Areas.**

Dear Secretary,

Thank you for this opportunity to make a submission to the References Committee's inquiry into protected area management.

The Victorian National Parks Association is an independent, non-profit, member-based organisation, and has been working for the protection of biodiversity in Victoria since 1952. Since that time we have seen great advances in Victoria's representative system of national parks and other conservation reserves, and we have also seen a considerable increase in the threats to the integrity of natural systems in those reserves. This situation is not peculiar to Victoria, indeed natural areas worldwide are subject to similar threats. (Note *Attachment 2*, which illustrates the considerable loss to biodiversity in Victoria since European settlement.)

We are particularly appreciative of this Federal inquiry, because two of the greatest threats to the integrity of parks and reserves in Victoria lie very much within the Federal sphere of influence. These are:

- **Global warming.** Given that most of Victoria's protected areas are fragmented and/or generally isolated from other natural areas by farmland, towns and cities, there is little opportunity for migration of ecological communities south to cooler climes as would have happened in earlier periods of "natural" global warming. There are also clear indications that climate change may be happening at such a fast rate that the evolutionary changes that would normally have assisted species to cope with geographic or altitudinal migration would be unlikely to occur this time around. The threat to ecological systems and their biodiversity is considerable, indeed frightening.

There is therefore a clear and compelling need for the Federal Government to take unequivocal action within its own jurisdiction, and in the international sphere, to address the causes of global warming. The report of this inquiry must include a clear statement of the threat global warming poses to the integrity of Australia's representative protected area system, and a clear call to action by the Federal Government to do all in its power to deal with that threat.

- **Feral weed and pest invasions.** The rapid growth of introduced plant, animal and pathogen pests is a world-wide phenomenon, and Australia, despite its geographic isolation, has not been immune to this plague. Indeed Parks Victoria's *State of the Parks 2000* report identified 748 exotic weed species growing in Victoria's parks, over 420 of which are regarded as major environmental weeds. (And this problem is not restricted to national parks and reserves – weeds threaten all natural areas, and all agricultural areas.) Australia's isolation, however, does provide us with the opportunity to take immediate steps to prevent future invasions. We need to close loopholes that continue to allow the legal importation of known and potential invasives, for industries such as the nursery, pastoral and aquarium trades.

This will require a range of new measures, including the introduction of 'permitted lists', at national and state/territory level. This ensures that any species imported into Australia have passed a thorough 'weed risk assessment' (WRA) and are not known weeds. This is instead of the current 'prohibited list' system, which bans some species, but allows the legal import of many thousands of known weeds.

No species should be imported without passing a weed test.

In 2005, The Australian Government promised to change to a 'permitted list' system by 2006. Assuming the promise is kept, the next points become the most pressing priorities. Even with a 'permitted list' and very strong quarantine checks at our borders, we will still have illegal and accidental imports, and some of the imported species in gardens today will inevitably escape tomorrow. Thus we will continue to have new outbreaks, including in our National Parks and other lands, but our 'early warning' identification and eradication system isn't adequate. If a potential weed or invasive animal gets through, there's a fair chance of it establishing and spreading, unhindered by attempts to get rid of it.

Needed are 'rapid response' teams to quickly locate, identify and eradicate outbreaks of new invasive species. Currently, these rapid response systems vary across states, and have responsibilities scattered across different departments and levels of government. They are often underfunded, and based in programs which don't target the most threatening new weeds.

We need a detailed national plan, co-ordinated by the Australian Government and replicated across the states and territories, to eradicate or contain new invasions. This is what the Australian Government promised in 1997 in the National Weeds Strategy. Systems and people must be properly equipped to quickly identify, assess and eradicate newly established invasive species, sometimes responding to alerts from the public, and working towards binding, measurable targets.

We need a plant labelling system for the nursery industry. It must be mandatory, as voluntary systems are inequitable and do not work. This would comprise a range of measures including a requirement for all those selling plants to advise customers of a plant's 'weediness'.

All known weeds should immediately be banned from sale from all outlets.

These measures should ensure that Australia's National Parks (as well as other public and private lands) are better protected against new outbreaks of invasives (feral plants, animals and pathogens) and our work to eradicate existing infestations will be vastly more effective.

There are other imperatives for Federal funding and resource support for park and other conservation reserves managed by the Victorian Government, and these are indicated under this inquiry's terms of reference below.

*(a) The values and objectives of Australia's national parks, other conservation reserves and marine protected areas.*

Most notably, the Victorian National Parks Act 1975 is very clear about the objects of national and state parks. They are to provide:

- (a) for the preservation and protection of the natural environment including wilderness areas and remote and natural areas*
- (b) 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*
- (c) for the study of ecology, geology, botany, zoology and other sciences relating to the conservation of the natural environment in those parks; and*
- (d) for the responsible management of the land in those parks.*

Sections of the Act which relate to other reserve categories, and many other State and Federal Acts and strategies etc., also set out appropriately high objectives for biodiversity and other conservation imperatives. It is important to keep these many important imperatives in mind in relation to any considerations by this enquiry.

*(b) Whether Governments are providing sufficient resources to meet those objectives and their management requirements.*

Essentially, budget levels for the management of national parks and other conservation reserves in Victoria (and elsewhere in Australia) have been inherited from a time when the threats to these reserves were considerably less than they are today, and our understanding of the difficulty of maintaining biodiversity, and natural systems generally, has grown considerably since that time.

In recent years there have been many attempts to indicate appropriate funding levels - comparing funding per head of population, or per hectare etc. with other Australian States or with other countries. It would seem high time, however, in the somewhat compromised history of biodiversity management, to actually cost the management actions needed to give long-term security to the integrity of the natural systems within the reserve network. Surely, nothing less is asked for by the legislation.

It is not within the VNPA's capacity to reliably set that level of funding, though we are sure it is considerably higher than current levels. It is also unlikely to be within the capacity of this Senate inquiry to reliably set that level. But it is clearly the responsibility of the Victorian Government, (and the other Governments managing the conservation estate), and within its capacity, to set about assessing the management actions required for secure long-term protection of the integrity of the reserve system.

*(c) Any threats to the objectives and management of our national parks, other conservation reserves and marine protected areas.*

Most importantly, please refer to the two dot points at the start of this submission, pointing out that global warming and weed and pest invasion are the two greatest threats to the integrity of the reserve system, and that these are two areas in which the Federal Government must make a very real contribution.

There are many other threats, difficult to detail in this brief submission. These include, however:

- commercial exploitation (in possibly a large number of guises). Most particularly, any procedure whereby park funding is tied to commercial operations has the capacity to lead to compromises in park management.

- inappropriate activities (ie those activities which are incompatible with the primary objectives above).
- overuse by visitors (parks being being “loved to death”). Careful visitor management should not lead to visitor limitation or exclusion, but visitation should always be compatible with the objectives above. Careful planning is essential.
- sometimes questionable fire management. There is a need for better monitoring of management burns in parks and reserves, so that the short and long-term effects of those burns are better understood (ie their effect on fire mitigation, and their effect on biodiversity etc.).
- An unfortunate lack of understanding in the broad community of the purposes of a representative reserve system, and the management processes required for lasting protection of park values.

This last point is an important one. In recent years, there has been a marked decrease in community conservation education processes by both the Victorian and Federal Governments. Oddly, this has happened in conjunction with an increased community concern for conservation issues, and an increased debate on the purpose of the reserve system. Essentially, there are many misunderstandings being aired in the community, and they should be addressed by better community education. Note the postscript at the end of this submission. (If Governments employed a similar lack of enthusiasm with road safety education, we would still have people arguing that seat belts trapped people, and that speed didn't cause accidents.)

*(d) the responsibilities of governments with regard to the creation and management of national parks, other conservation reserves and marine protected areas.*

Essentially, we (the people) have set ourselves up to be custodians of the earth's natural systems, and the considerable biodiversity those systems support. And understandably (given the difficulty of that task) we have handballed that responsibility largely to our Governments.

The Australian Constitution lays responsibility for land management primarily with the State Governments. It is therefore the Victorian Government that has the task of ensuring that Victoria's 40,000 odd species have a secure future. (That number, taken from the VNPA's *Nature Conservation Review Victoria 2001* by Barry Traill and Christine Porter, includes an estimate of around 35,000 fungi, but excludes “lower” life forms like bacteria etc, which are also an essential component of biodiversity.)

A copy of that 2001 review, which assessed gaps in Victoria's CAR reserve system, is an attachment to this submission. Note that since the review was published, a series of marine national parks and reserves has been established in Victoria, and also a series of Box-Ironbark parks. The Government is now assessing the need for reservation of Red Gum ecosystems, and also some old growth forests in East Gippsland.

The Victorian Government is clearly responsible, chiefly under the national Parks Act, for effective management of all of the natural values (not just threatened species) of the reserve system. It also has responsibilities under the Flora and Fauna Guarantee Act, the Catchment and Land Protection Act, the Parks Victoria Act, and a number of other pieces of legislation.

There are also a number of emerging management relationships under native title agreements etc.

The Federal Government has a number of obligations under the EPBC Act. It also has considerable capacity to support the Victorian Government financially in its task.

More particularly, both Governments have a clear moral responsibility to honour those Acts and, working clearly in an atmosphere of goodwill and co-operation, to ensure that the long-term protection of biodiversity is secured. This is no small task, and no small responsibility. It is

possible, indeed inevitable, that our generation will be judged by future generations on its response to the task - on its capacity and its sense of urgency. Our failure to manage the task cannot be remedied by future generations.

*(e) The record of Governments with regard to the creation and management of national parks, other conservation reserves and marine protected areas.*

The Victorian Government, or rather a succession of Victorian Governments, have a good record in regard to the creation of national parks and reserves. Since the formation of Land Conservation Council in 1971, and its successors the Environment Conservation Council and the Victorian Environmental Assessment Council, we have seen enormous progress towards a truly representative terrestrial and marine reserve system in Victoria. It has been an impressive process, and a model that has been emulated by many. There are still gaps however (see attachment: *Nature Conservation Review Victoria 2001* by Barry Traill and Christine Porter, VNPA).

In many respects Victoria has quite a good record in the management of its national parks and reserves. In particular, the dedication of management agency and park staff is generally very high, and information systems are being developed to assist intelligent, science-based management processes, and facilitate intelligent prioritisation of resources.

The problem, as identified in (b) above, is that the available resources are far from adequate.

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If your inquiry would like further information, we are very happy to answer any queries you may have.

You can contact me, or the VNPA Director Charlie Sherwin, at the Victorian National Parks Association at any time.

With best wishes for your task,

Yours faithfully,

Phil Ingamells  
National Park management campaigner  
Victorian National Parks Association

*(See next page for postscript and attachments)*

## **Postscript to VNPA submission: Some common community misconceptions on park management.**

There are a number of common misconceptions about the purpose of park and reserve systems, and about their management.

### **Cattle in parks**

There has been some debate recently in Victoria over the grazing of cattle in parks, particularly the Alpine National Park. There is abundant evidence that grazing has done great damage to natural systems in the alps, and continues to do great damage to wetland systems and woodlands in the Barmah State Park and forests. If the current inquiry chooses to look again at this evidence, it should start with the Victorian Government's 2005 *Alpine Grazing Taskforce Report*. We are also very happy to supply further information in this regard.

### **Fire** (see *Attachment 3* for more information)

Claims are often made that conservation groups do not allow control burning in parks, or even that there is no control burning in parks. In Victoria, between 2002 and 2005, some 95,200 ha of land managed by Parks Victoria was control burned. This is close to one third of all control burns on Victorian public land. The Victorian National Parks Association is well aware of the long (c. 50 million year) evolutionary relationship native ecosystems have had with fire. We do, however, ask for scientific monitoring of the effects of management burns, and natural burns, so that we are better able to manage control burns to support biodiversity outcomes.

We also note that global warming is likely to increase the frequency of bushfires in Victoria, and refer to our call for Federal action on this issue above.

### **Access**

Parks are often referred to as being "locked up". This highly emotive term doesn't easily accommodate the fact that park visitation is increasing, and indeed that the declaration of parks often generates considerable visitor interest. For activities that are quite inappropriate in a national park, there is generally ample opportunity to plan for these activities outside parks. We note, again, the "objects" of Victoria's National Parks Act, above.

## **Attachments to this submission (forwarded by mail):**

**Attachment 1:** *Nature Conservation Review Victoria 2001* by Barry Traill and Christine Porter, VNPA.

**Attachment 2:** CD of Vegetation maps of Victoria, showing distribution of broad vegetation types pre 1750 and in 1987.

**Attachment 3:** *National Parks and Fire*: Park Watch feature, March 2006. VNPA.