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Monday 28<sup>th</sup> August 2023

**Re: Submission on the Draft Parks of the Central Fleurieu Peninsula Management Plan**

To whom it may concern,

The Nature Conservation Society of South Australia (NCSSA) appreciates the opportunity to provide feedback on the Department for Environment and Water's *Draft Parks of the Central Fleurieu Peninsula Management Plan*.

Since 1962, the NCSSA has been a strong advocate for the protection of nature, with particular emphasis on nationally and state-listed threatened plants, animals and ecological communities, and the management of protected areas.

NCSSA's feedback focuses on the following key points:

- The adequacy of including multiple parks under one management document,
- The draft document is not a plan, but a strategy, and does not meet the requirements of the National Parks and Wildlife Act, 1972
- The need for formal management plans to be developed to identify and address site-specific issues at each of the 15 parks, *and*
- Comments on management of individual parks and threatened ecological communities.

### **Adequacy of combined management plans**

Section 38(1) of the South Australian Parks and Wildlife Act, 1972, requires the minister to prepare a plan of management for a reserve as soon as practicable after its constitution. The draft document for the central Fleurieu parks has been prepared in response to the establishment of Hindmarsh Valley National Park, but covers 14 other parks as well.

NCSSA notes a trend towards bringing multiple non-contiguous parks within regions under single management documents, in order to apply a consistent management approach at a landscape scale. For example, this umbrella approach has recently been applied to various parks on Kangaroo Island, and a single plan covers Glenthorne National Park, Hallett Cove Conservation Park and Marino Conservation Park south of Adelaide.

In principle, NCSSA supports the concept of landscape-scale strategies for management of parks and other protected areas that are affected by similar management issues. However, with the combined approach there comes a risk that detailed planning for the management of individual parks and their unique attributes will fall by

the wayside – with the knock-on effect that they will be managed ineffectively, and the conservation value of South Australia’s protected areas will decline. The draft plan for the central Fleurieu parks is a case in point.

This is the first management document developed for most of the central Fleurieu parks, and replaces only one pre-existing management plan, for Stipiturus Conservation Park, which was written in 2007.<sup>1</sup> As an illustration of the amount of detail that is lost via the combined document approach, consider the level of detail in the current plan for Stipiturus Conservation Park alone, versus the detail contained in the draft document for 15 central Fleurieu Parks, *including* Stipiturus CP (see Table 1).

The new draft document, covering 15 parks, is shorter than the single-park plan for Stipiturus CP. It is heavily illustrated at the expense of text, contains just one regional map and no site-specific maps of individual parks, and just one reference. The threatened fauna list for the 15 parks does not contain any invertebrate species (although the plan does contain a photograph of an insect), whereas the Stipiturus CP Management Plan names two invertebrates of conservation significance and identifies a knowledge gap around invertebrate diversity.

**Table 1: Declining detail in Fleurieu Peninsula management plans. Comparison of Stipiturus Conservation Park Management Plan & draft central Fleurieu parks plan**

	<b>Stipiturus Conservation Park Management Plan (2007)</b>	<b>Draft Central Fleurieu Parks Plan for 15 parks (2023)</b>
Number of pages	32	28
Number of maps	2	1
Number of photographs	1	12
Number of references	15	1

This brevity, and lack of referenced scientific evidence, is concerning in relation to the Fleurieu parks themselves, but NCSSA makes the broader point that there is a risk of inadequate management plans being instituted throughout South Australia if a similar multi-park approach is adopted in other regions of the State.

### **The draft document is not a management plan**

In its current form, NCSSA does not consider the draft management plan for the central Fleurieu parks a management plan. Rather, **it is better termed a management strategy**. The title of the document should be amended to reflect this.

NCSSA emphasises that the current document **does not meet the obligation, under Section 38(1) of the NPW Act, to prepare park management plans** for the 15 parks it covers.

The draft document itself goes some way towards acknowledging this. It states that:

*“The strategic management objectives and strategies outlined in this plan are designed to enable adaptive management of the parks. The **specific actions required to manage these parks in accordance with the plan will be developed and monitored at a park operations level**. This approach provides the flexibility necessary to address future management challenges and opportunities.”* (p.5; emphasis added)

The above excerpt tacitly recognises that the draft document is not fit for purpose as a *management plan*, and requires further ‘specific actions’ to be developed for the individual sites before any management actions can be implemented on the ground – in other words, individual management plans will still need to be written.

<sup>1</sup> SA Government (2007). Management Plan Stipiturus Conservation Park. [https://cdn.environment.sa.gov.au/docs/stipiturus\\_cp\\_mp.pdf](https://cdn.environment.sa.gov.au/docs/stipiturus_cp_mp.pdf)

NCSSA notes that the excerpt does not include any commitment to write individual park management plans on any specific timeframe, whereas Section 38 of the NPW Act requires management plans to be written ‘as soon as practicable’.

Further, by adopting a multi-park umbrella strategy document in lieu of individual management plans, and relegating the development of individual park management plans to the park operations level, this could effectively shield the process of developing park management plans from public scrutiny. It removes the guarantee that the community will be consulted on the development of individual park management plans for any of the 15 parks. This would not meet the obligations of the Minister under Section 38 (3, 4, 5, 6) of the NPW Act, which requires draft management plans to be announced, made available to the public, and be open for feedback for a three-month period. It also removes the guarantee that draft management plans for the 15 individual parks, and public feedback on any such plans, will be presented by the Minister to the Parks and Wilderness Council, as required under Section 38 (7) of the NPW Act.

NCSSA contends that the need for ‘flexibility’ to meet future challenges and opportunities should not be used as a pretext for developing vague and non-site specific plans at the landscape level. Change is inevitable, both in terms of ecology, and the social and legal frameworks in which management must take place. Adaptive management is not achieved via avoidance of writing specific plans; it is achieved by writing plans in such a way that change, and new information, can be accommodated, openly and honestly.

If there is a concern that a management plan will become obsolete over time, this can be addressed by, for example, by writing in a date for its future review.

### **Essential information to include in management plans**

NCSSA recommends that park-specific plans should contain sufficient detail to guide managers and the community about the unique natural values of each park, identify key threats and how to manage them, and should include as a minimum:

- maps showing the park’s boundaries, gates, trails, hydrological features, and identifying major vegetation communities (e.g. see Figure 2 on p.6 of the current Stipiturus Conservation Park Management Plan for an example of good practice)
- complete historical flora and fauna species lists
- lists of *all* threatened species (Federal, State, and regional) and ecological communities that are known to occur, or are likely to occur, at the site,
- management actions needed to maintain, improve, and monitor the individual park’s conservation values, *and*
- identification of relevant documents relating to threatened species or ecological communities found at the sites, such as recovery plans, documents on key threatening process, and threat abatement plans.

Data on species occurrence and vegetation communities is available via NatureMaps queries for people who know that platform exists, have a computer with internet access, and who know how to use the platform. However, a management plan should be an accessible one-stop shop that interprets and packages information for managers and the public. It should clearly identify a park’s features and natural values, identify legislative requirements linked to individual threatened species and ecological communities, and link these to site-specific conservation actions.

The ‘challenges and opportunities’ paradigm used in the draft document (see p.13) is of a style appropriate for a strategy document, but does not provide a rigorous approach for identifying, prioritising or managing key threats to the natural values of individual sites. Opportunities no doubt exist for, e.g., enhanced visitor experiences, and deserve highlighting, but should not be listed on a par with, say, the obligation to manage or monitor a listed threatened species or habitat.

## Time-bound management actions

The draft document outlines major management strategies that will be applied across sites. However, it lacks detail about the timeframes for implementing or evaluating management actions, which is an essential part of an adaptive management approach.

This needs to be remedied, either by specifying timeframes for actions mentioned in the document, or preferably, by setting a clear timeframe for producing park-specific management plans containing a higher level of operational detail – please see comments above on the adequacy of multi-site plans.

## Management objectives under the NPW Act, 1972

Some of the key objectives of park management outlined under Section 37(1) of the SA National Parks and Wildlife Act, 1972 are addressed in the draft document in a way that implies that as little management action as possible will be carried out in practice.

Government management of public protected areas should be exemplary, and set a high standard for conservation management outside of the parks estate. Management of parks should also maintain the ‘good neighbour’ policy by managing parks in ways that minimise negative impacts, e.g. of invasive species, on surrounding properties.

Examples are given below.

### ***Control of vermin and exotic animals***

Under Section 37, Part 1(e) of the NPW Act, control of introduced fauna is a key objective of park management.

The draft Fleurieu parks management document states that introduced rabbits, hares, goats and deer will require management **when their impacts** to biodiversity, such as grazing and trampling native vegetation and spreading phytosphthora **become unsustainable**.

This wording implies that a certain level of grazing, trampling, and spreading of phytosphthora by introduced herbivores can be considered *sustainable* and will be tolerated. Consideration of impacts should guide prioritisation of where and how intensively to control introduced herbivores, but NCSSA points out that control of declared species is *required* under the Landscape South Australia Act, 2019.<sup>2</sup> In addition, the spread of *Phytophthora* cannot be considered sustainable at any level because this key threatening process is irreversible.<sup>3</sup>

Similarly, the draft document only states that control measures for introduced cats, foxes and rats will be ‘*considered*’ **where their impacts are a significant contributor to the decline of native species, and where programs are likely to be effective**. As with declared herbivores, NCSSA points out that the control of declared predators such as cats and foxes is *required* under the Landscape South Australia Act, 2019.

A *laissez faire* approach to managing introduced predators, especially cats and foxes which are identified as key threatening processes under the Environment Protection and Biodiversity Conservation Act 1999,<sup>4</sup> unless they are proven to have caused the decline of native fauna species, is risky. There will be very few species for which this level of evidence is available, which will lead to a default position of no active management. NCSSA urges a reversal of this thinking, towards considering *which native species would benefit and recover* if introduced predators were better controlled throughout the landscape.

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<sup>2</sup> PIRSA. Pest animal policies and regulations. Available at: [https://pir.sa.gov.au/biosecurity/introduced-pest-feral-animals/pest\\_animal\\_policies\\_and\\_regulations](https://pir.sa.gov.au/biosecurity/introduced-pest-feral-animals/pest_animal_policies_and_regulations)

<sup>3</sup> DCCEW. Dieback caused by the root-rot fungus (*Phytophthora cinnamomi*). Available at: <http://www.environment.gov.au/cgi-bin/sprat/public/publicshowkeythreat.pl?id=2>

<sup>4</sup> DCCEW. Listed key threatening processes. Available at: <http://www.environment.gov.au/cgi-bin/sprat/public/publicgetkeythreats.pl>

The target of park management should be to maintain populations of exotic fauna at as low a level as practicable, and to eradicate them from individual properties where possible. State Government policy guidance on pest animal management recognises that there is a strategic and cost advantage to early eradication of a species that has not yet become established at a particular location.<sup>5</sup> The current emphasis in the draft document on the ‘sustainability’ of the *impact* of introduced fauna does not encourage this precautionary approach of early intervention, and the document should be revised in line with that policy.

NCSSA points out that if a bare minimum of feral animal control is carried out on-park, and surrounding landholders faithfully meet their obligations to control declared species under the Landscapes South Australia Act, 2019, then parks could become safe havens for feral animals. This is fundamentally incompatible with the purpose of parks.

### ***Control and eradication of weeds***

Under Section 37, Part 1(d) of the NPW Act, it is a key objective of park management to destroy dangerous weeds and eradicate or control noxious weeds and exotic plants. It is also a requirement on landholders to control declared plants on their properties under the Landscapes South Australia Act, 2019.

As with invasive animals, NCSSA expresses similar concerns about the draft document’s apparent minimisation of the intent to control weeds on the 15 park properties. The document states that ‘***control will be implemented to protect areas of high conservation value, and where pest plants threaten the survival of threatened flora populations***’.

It is appropriate that the areas and species of highest conservation value (i.e. those under greatest threat of extinction/degradation) will be *prioritised* over other areas, but the document contains no commitment to control weeds in other areas.

NCSSA points out that it is obligatory to control declared plant species under the Landscapes South Australia Act, 2019. A commitment to weed control should be informed by the list of declared plants<sup>6</sup> and an assessment of the invasive potential that weeds pose, including in areas of parks considered to have lower conservation value. Further, the same observation on the value of early eradication of new invasive animals is equally applicable to plants.

### ***Control of native herbivores***

The draft document states an intent to control native herbivores, particularly Western Grey Kangaroos, where there is evidence that total grazing pressure is having an unsustainable impact on conservation values. This may be necessary at individual sites, but should not be over-generalised throughout the region, and should be driven by conservation, and not commercial, considerations.

Total grazing pressure is a coarse measure of herbivore impact that does not necessarily distinguish between the impacts of native versus introduced species. Where non-native herbivores are present, these should be the first line of control, with protected native herbivores controlled only when strictly necessary.

The NPW Act Section 60(J)(d) permits the Minister to grant permission to harvest protected animals on-reserve where the Minister has adopted a plan of management for the reserve under Section 38 of the same Act. In light of the inadequacies of the current draft management document for the 15 central Fleurieu parks, which is not a management plan but a strategy document (see earlier comments), NCSSA does not consider that the draft plan

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<sup>5</sup> PIRSA (2019). Declared Animal Policy – New and Emerging Introduced Animals. Downloaded from [https://pir.sa.gov.au/biosecurity/weeds/landholder\\_responsibilities](https://pir.sa.gov.au/biosecurity/weeds/landholder_responsibilities) 18-08-2023.

<sup>6</sup> PIRSA. Biosecurity – Weed management programs. Available at: [https://pir.sa.gov.au/biosecurity/weeds/weed\\_management\\_programs](https://pir.sa.gov.au/biosecurity/weeds/weed_management_programs)

would meet the requirements of being a management plan for any of the 15 parks. Harvest of protected kangaroos in any of these parks would therefore not meet the requirements of Section 60(J)(d).

Individual management plans for the 15 parks would need to be developed and adopted before harvest of kangaroos would be permissible.

### **Site- and issue-specific feedback**

NCSSA has compiled detailed comments on the management of specific parks and ecological communities. These are provided in Appendix 1.

If you would like to clarify or discuss this submission please contact me on 0431 448 133, or via email at [kirsty.bevan@ncssa.asn.au](mailto:kirsty.bevan@ncssa.asn.au).

Yours sincerely,



Kirsty Bevan  
CEO

## Appendix 1

### NCSSA comments on management of individual parks & ecological communities

#### Threatened ecological communities

One of the major focuses of the draft plan is managing the Fleurieu Peninsula's swamp habitats (Theme 2: Conserving Fleurieu Peninsula Swamps).

Swamps of the Fleurieu Peninsula are recognised under Federal legislation as a **Critically Endangered Threatened Ecological Community**<sup>7</sup> (Environment Protection and Biodiversity Conservation Act, 1999). This is briefly mentioned in the draft document, but the locations of these habitats are not comprehensively identified or mapped. The legislative requirements for managing these habitats should be clearly addressed in the plan.

A Federal *Conservation Advice* document<sup>8</sup> exists for this Threatened Ecological Community, and should be referenced in the management plan. The management plan should address the threats and management guidelines contained in the *Conservation Advice*, and state how the management plan aligns with the guidelines. If the proposed management practices deviate from the *Conservation Advice* document, the reasons for this should be explained.

#### Parks

##### *Hindmarsh Valley National Park*

This park was recently added to the National Parks estate due to its outstanding natural values and because it contains ecological communities otherwise poorly represented within protected areas. NCSSA previously provided feedback on the unsuitability of this park for mountain biking due to the fragile nature of its ecological communities, and is pleased to note that this activity is no longer proposed.

The draft document notes the need for park visitors to adhere to strict phytophthora hygiene protocols, and that there will be visitor education about its importance. This is particularly important in Hindmarsh Valley NP where visitor access has previously been restricted, and visitors will now visit pristine areas unaffected by phytophthora. More detail is needed about the precautions that will be taken to prevent the spread of phytophthora. Brush stations may not be sufficient, and boot washing stations with phytoclean solution may be a better option.

##### *Stipiturus Conservation Park*

For Stipiturus Conservation Park the draft document represents a backward step in its management planning. The current plan for this park is rigorous and detailed (see earlier comments), and provides a good model for the kind of information and level of detail that should be included in all management plans.

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<sup>7</sup> DCCEW. EPBC Act List of Threatened Ecological Communities. Available at: <http://www.environment.gov.au/cgi-bin/sprat/public/publiclookupcommunities.pl>

<sup>8</sup> DCCEW. Fleurieu Peninsula Swamps Conservation Advice. Available at: <http://www.environment.gov.au/cgi-bin/sprat/public/publicshowcommunity.pl?id=31&status=Critically+Endangered>