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Ms Amy Allen  
Protected Area Unit  
Department of Environment, Water and Natural Resources  
GPO Box 1047, Adelaide SA 5001

June 6, 2017

**Re: Innamincka Regional Reserve Draft Management Plan 2017**

Dear Amy,

The Nature Conservation Society of SA (NCSSA) welcomes the opportunity to comment on the Innamincka Regional Reserve Draft Management Plan 2017. As South Australia's primary nature conservation advocacy organisation, NCSSA has an active interest in the protection and conservation of South Australia's natural resources with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities, management of protected areas and native vegetation.

Since 1962, NCSSA has played a key role in establishing and expanding the reserve system in South Australia by promoting the protection of key biodiversity assets through the dedication of reserves and by undertaking ecological research to inform their management. Our current and past activities also address the significant need for ongoing management within parks and ongoing engagement and education of the wider community regarding the importance of protected areas for nature conservation.

Although NCSSA recognises that the preparation of a new management plan for the Innamincka Regional Reserve is a requirement under the National Parks and Wildlife Act, we have serious concerns that the Ramsar Management Plan for Coongie Lakes has never been completed. The NCSSA strongly recommend that DEWNR direct further effort and resources to completion of the Ramsar Management Plan in order to guide the Reserve management plans for both Innamincka Regional Reserve and Coongie Lakes National Park.

NCSSA provides the following comments on the Innamincka Regional Reserve Draft Management Plan. If you would like to clarify or discuss any of the points raised please contact me on (08) 7127 4633 or via email at [nicki.depreu@ncssa.asn.au](mailto:nicki.depreu@ncssa.asn.au)

Yours sincerely,

Nicki de Preu  
Conservation Ecologist

## **NCSSA comments on Innamincka Regional Reserve Draft Management Plan - 2017**

### **Cover**

We acknowledge the cultural importance of Innamincka to the Yandruwandha people and the Yawarrawarrka people but recommend that the important natural values of the area are also acknowledged in the subtitle to emphasise the words of John Schutz on the first page of the plan i.e. A management plan for the Innamincka Regional Reserve is being prepared to ensure the long term protection of the regional reserve's natural values.

### **Developing this draft plan**

We support the statement to clarify that the intended purpose of the plan is not to provide strategies to address all issues confronting the regional reserve or specify all strategies that will be undertaken but that it seeks to provide an overview of management arrangements and outline key priorities for long term management. Given that all park management plans are now moving towards this format we believe that it is useful to clarify these points.

### **Significance and purpose of the regional reserve**

We recommend that this section acknowledge that Innamincka Regional Reserve is one of South Australia's largest protected areas and plays an extremely important role for long-term conservation of biodiversity.

### **What are we protecting?**

We recommend that the first dot point under "Plants and animals" acknowledge some of the migratory birds that occur on Innamincka are considered Matters of Environmental National Significance under the EPBC Act.

### **What are the challenges and opportunities?**

The impact that climate change should be acknowledged in this section as it will be a significant challenge for future management of the Reserve. We also strongly recommend that the management of threatened species and ecological communities to ensure their long-term conservation will be a significant challenge that should be added to this list.

### **Theme 3 – Sustaining ecosystems of the Cooper Creek and surrounding landscape**

The conservation of natural values is fundamental to sustaining the long-term health of the Cooper Creek ecosystem and should be acknowledged as such in the second sentence of paragraph 2 (Page 19).

Page 19: We recommend the 3rd sentence in the 4th paragraph is amended to "Additionally, a decline in average annual rainfall and an increase in average annual maximum and minimum temperatures is predicted for the far north of South Australia in response to projected climate change scenarios".

Page 19, Paragraph 5: We recognise that the assessment and approval of water affecting activities is guided by the Natural Resource Management Act, SA Arid Lands Strategic Plan and Far North Prescribed Wells Water Allocation Plan however strongly recommend the Management Plan acknowledge how it aligns with and will implement priorities identified in Ramsar Handbook 18: Managing wetlands (Ramsar Convention Secretariat, 2010).

Page 19, Paragraph 8: It would be useful to give some examples of some of the species and communities that occur within the Marqualpie land system and are uncommon in South Australia.

Page 19, Paragraph 9: The statement that "The retention of riparian vegetation and the protection of threatened ecological communities from clearance or invasion by pest plants is a priority" needs further clarification as to the cause/s of clearance. Would this be associated with grazing, resource extraction, park management or visitor use or possibly all of these?

Page 19, Paragraph 10: Further information is required to support the statement that "rare or threatened species require special consideration to ensure that they are not adversely impacted by management activities, tourism or resource use". What sort of "special consideration" will be given in a practical and operational sense? In our previous submission on the Discussion Papers NCSSA recommend that there are number of key areas that require special consideration as a part of the regulation processes under the *Petroleum and Geothermal Act 2000*, the *Mining Act 1971* and the Crown Lease under the *National Parks & Wildlife Act 1972*, in particular areas where nationally and state listed threatened species or ecological communities are known to occur. Of particular importance is the area where the most recent sighting of the Night Parrot was recorded in June 1979. The inventory by Neagle (2003) and

biological survey report on the Marqualpie Land System (Neagle & Armstrong, 2010) provide further details of key areas that are a priority for biodiversity conservation that should be acknowledged in the plan.

Also, we recommend that further detail is required about how the management objectives will align with the recovery plan that has been developed for the Plains Mouse and other recovery plans for threatened species that may be developed in the future.

Page 19, Paragraph 12: The plan correctly acknowledges that Innamincka RR is of international significance for the conservation of migratory bird habitat and that the Australian Government has entered into three bilateral migratory bird agreements. We recommend that this section of the plan also note that migratory shorebirds covered under these agreements are listed as Matters of National Environmental Significance under the EPBC Act.

#### **Page 20: The Coongie Lakes Ramsar Wetland**

Given the international significance of the Coongie Lakes Ramsar Wetland and the fact that the ECD Report was published in 2011 we strongly recommend that DEWNR make a commitment to preparing a plan for wise use rather than just saying such a plan “has not yet been prepared”. Also, the statement that “In recognition of the important status of the Ramsar Wetland, the portion of the Coongie Lakes Ramsar Wetland within the Innamincka Regional Reserve is managed in conjunction with the regional reserve” is unclear and requires further detail about the implications for management of the reserve. For example how will the Management Plan align with priorities identified in the Ecological Character Description Reports and the ‘Plan for wise use’ once that is completed?

Page 21, Paragraph 2: The Coongie Lakes ecological condition descriptor Report (Butcher & Hale, 2011) notes that several Weeds of National Significance are of concern for the area including Mesquite spp. (*Prosopis* spp.), Mexican poppy (*Argemone ochroleuca*), Parkinsonia (*Parkinsonia arculeta*) and Prickly acacia (*Acacia nilotica*). We recommend that the plan acknowledge the risk posed by these species to future management of the Innamincka RR.

#### **Page 21: Objective and strategies**

We strongly recommend an additional objective is added to this list acknowledging the management of the reserve to protect and conserve threatened and regionally rare plants and animals as a key objective. We also recommend the word “natural” is inserted before “values” in the last dot point that currently states “Continue to encourage volunteers to undertake monitoring and surveys that improve understanding of the regional reserve’s values”.

#### **Page 22: Search for the Night Parrot**

Although there are past records of the Night Parrot in the Innamincka region and suitable habitat occurs in Innamincka RR the text in this section is somewhat misleading. We are assuming that the population located “in the region” in 2013 is referring to the birds found on what is now Pullen Pullen Nature Reserve in Central Queensland? If that is the case, we recommend that the text is amended to clarify this and acknowledge the urgent need for further survey work to determine if the species still occurs in the region using methodology developed by the Night Parrot Recovery Team.

#### **Theme 4: Enabling the ecologically sustainable use of natural resources**

The plan should acknowledge that the pastoral leases previously owned by Kidman & Co. have recently been sold to Gina Reinhardt and a Chinese owned corporation. We recommend that the plan provide further details about the inspection process for monitoring the impact of cattle grazing on the Reserve and the types of monitoring and conservation activities that have been conducted jointly by DEWNR and the pastoral lessees. We also recommend that the plan contain further information about the impact of resource utilisation on conservation values of the Reserve given that two reviews have been undertaken since the current management plan was adopted in 1993.

The significant threat posed by resource development activities in Queensland, especially Coal Seam Gas & unconventional gas production and potential impact that this could have on hydrology and future management of the Reserve should also be acknowledged in the plan. For example chemical/oil spills and disruption to aquifers and sub-surface flow may result that is not covered by South Australia’s *Petroleum & Geothermal Act 2000*.

We strongly support the need for development of a waste management plan to minimise the current environmental impacts of rubbish tip and guide appropriate management. Such areas are known to support high numbers of feral cats that can readily spread out into surrounding areas and have devastating impacts on native fauna species.

## **Theme 5: Connecting visitors to the regional reserve's history, the Cooper Creek landscape, and Yandruwandha and Yawarrawarrka culture**

We support the need for a long-term, cohesive planning approach to visitor management to ensure visitor planning and infrastructure development is undertaken in a sustainable manner that gives a high priority to the biodiversity conservation values of the Reserve and the Ramsar wetlands it contains. The Coongie Lakes ecological condition descriptor Report (Butcher & Hale, 2011) notes that soil compaction, loss of vegetation, leaf litter and introduction of pollutants and nutrients into the water around key waterholes and camping areas are key management issues for the area. This report also notes the emerging issues of increased recreational activities on water rat abundances at waterholes and overfishing in permanent waterholes which act as refuges for the native fish populations. These issues are also applicable to Innamincka RR and we recommend that they are acknowledged in the plan.

### **Page 28: Objective and strategies**

We recommend that the information in the first sentence and first dot point are reviewed as the current wording is somewhat repetitive.

### **Appendix 1 - Threatened Fauna**

We recommend that the title of the Appendix is changed to Significant Fauna Species and further explanation provided of the column headings Conservation Status Australia (i.e. EPBC Ratings) and Conservation Status South Australia (i.e. NPW Act Ratings). We also recommend that the table include symbols to identify migratory bird species that occur on the Reserve and in particular species that are listed as Matters of National Environmental Significance under the EPBC Act.

We suggest it might be useful to include the text from the Discussion Paper as a preamble to the Appendices: "The following lists of flora and fauna highlight the species of high conservation value, recorded within the Innamincka Regional Reserve. This includes those species listed under State and Federal legislation".

### **Appendix 2 – Threatened Flora**

We recommend that the title of the Appendix is changed to Significant Flora Species and further explanation provided of the column heading Conservation Status South Australia (i.e. NPW Act Ratings).

## **References**

- Butcher, R. & Hale, J. (2011) Ecological Character Description for Coongie Lakes Ramsar site. Report to the Department of Sustainability, Environment, Water, Population and Communities, Canberra.
- Neagle, N. (2003) *An Inventory of the Biological Resources of the Rangelands of South Australia*. Department for Environment and Heritage, South Australia.
- Neagle, N. & Armstrong, D. (2010) *A Biological Survey of the Marqualpie Land System, South Australia, 2008*. Department of Environment and Natural Resources, South Australia.
- Ramsar Convention Secretariat (2010) Managing wetlands: Frameworks for managing Wetlands of International Importance and other wetland sites. Ramsar handbooks for the wise use of wetlands, 4th edition, vol. 18. Ramsar Convention Secretariat, Gland, Switzerland.