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Monday 30 January 2017

Re: Yellabinna and Warna Manda Parks and Nullarbor Parks Draft Management Plans

Dear Ms Kumar,

The Nature Conservation Society of South Australia (NCSSA) appreciates the opportunity to comment on the Yellabinna and Warna Manda Parks and Nullarbor Parks Draft Management Plans and the short extension in time to do so. Since 1962, NCSSA has been a strong advocate for the protection of native vegetation and biodiversity in South Australia with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities and the management of protected areas. Particularly, 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.

NCSSA strongly supports the central role of Far West Coast Aboriginal people in the management of these parks, particularly through the Yumbara Conservation Park Co-management Board and the Nullarbor Parks Advisory Committee. We support that these plans have been developed using the *Far West Coast Healthy Country Plan* as a basis, so that the aspirations and knowledge of Far West Coast Aboriginal people are central. We believe it would be appropriate for these management structures to now be empowered to oversee the implementation of these plans going forward, specifically by making the Nullarbor Parks Advisory Committee into a Co-management Board.

The on-ground implementation of park management plans is an issue of concern for the NCSSA. For these parks in particular, we would encourage the establishment of Indigenous ranger groups where this aligns with the wishes of Far West Coast Aboriginal people, as the success of this approach both environmentally and socially has been demonstrated in many other places. Resources to do so may be available through federal government funding programs and/or through support from the companies currently extracting resources within the park areas, such as Iluka Resources who have recently restarted the Jacinth-Ambrosia mine due to increasing zinc prices and whose 2017 half-yearly results report \$180 million free cash flow. In addition, we would encourage the Department of Environment, Water and Natural Resources to think broadly and innovatively about how the aspirations of Far West Coast Aboriginal people, as well as the broader community, in looking after country in these park areas could be achieved. A targeted adventure tourism business, properly managed, could provide an

income stream as well as discourage visitation to other environmentally and/or culturally sensitive areas that cannot support visitation. The establishment of public/private partnerships, such as with non-governmental organisations, accessing funds from the philanthropic sector and the targeted involvement of knowledgeable and dedicated groups such as Friends of the Great Victoria Desert could support the achievement of key strategies in these plans, for example as closing off excess vehicle tracks to protect country and sensitive cultural sites.

NCSSA provides the following specific comments on the Yellabinna and Warra Manda Parks and Nullarbor Parks Draft Management Plans. If you would like to clarify or discuss any of the points raised please contact me on (08) 7127 4633 or via email at julia.peacock@ncssa.asn.au.

Yours sincerely,

A handwritten signature in blue ink that reads "Julia Peacock". The signature is written in a cursive style and is set against a light yellow rectangular background.

Julia Peacock
Nature Advocate

NCSSA comments on the Yellabinna and Warna Manda Parks Draft Management Plan

Page 2: Developing this draft plan

We recommend that the plan include a statement to clarify that its intended purpose is not to specify strategies to address all issues confronting these parks and reserves but that it seeks to provide an overview of management arrangements and outline key priorities for long term management. Similar wording has been used recently in a number of park management plans such as that for Innamincka Regional Reserve. Given that all park management plans are now moving towards this generic format we believe that it is useful to clarify these points.

Page 3: Directions for Management

We note that monitoring and evaluation of this plan is mentioned under Directions for Management but we suggest the timing of this should be prescribed so that all stakeholders are aware of when the plan will be reviewed. We understand that the *Far West Coast Healthy Country Plan*, which underpins this plan, is supported by a work plan and a monitoring plan so review of this plan could be based on those. NCSSA requests periodic updates on how the strategies in this plan are being implemented and if they are achieving the expected outcomes.

Pages 5 - 8: Significance and purpose

We commend the Yumbarra Conservation Park Co-management Board for acknowledging the importance of the mallee woodlands contained within the Yellabinna parks for biodiversity conservation and interconnection with other protected areas that assist in providing resilience to the effects of climate change.

Whilst we strongly support the inclusion of threatened species as something 'we are looking after' in the list on page 6 for the Yellabinna parks, there is some repetition between the sixth, seventh and ninth dot points which could be rationalised. We strongly suggest including the total number of species of conservation significance, as listed under both the *Environment Protection and Biodiversity Conservation Act 1999* and the *National Parks and Wildlife Act 1972*, together with some specific examples. We strongly suggest the plan should also provide a full list of species of conservation significance as an appendix (as was included in the recent draft Simpson Desert Conservation Park and Regional Reserve Plan).

Similarly, on page 8, the total number of species of conservation significance, as listed under both the *Environment Protection and Biodiversity Conservation Act 1999* and the *National Parks and Wildlife Act 1972*, found within the Warna Manda parks should be included in the plan and a full list of species of conservation significance included as an appendix.

We suggest the location of the Iluka Jacinth-Ambrosia heavy mineral sands mine, mentioned on page 5, be included on the map on page 17.

Page 9: What are the challenges and opportunities?

We particularly support the third dot point regarding use by Far West Coast Aboriginal people being sustainable, especially given the combination of traditional and non-traditional hunting methods. We strongly suggest that the management of threatened species to ensure their long-term conservation is a significant challenge (including malleefowl, sandhill dunnart, desert greenhood and yellow Swainson-pea, as listed on page 6), particularly in response to climate change, and that it should be specified in this list as an additional dot point. The delivery of conservation priorities identified in various Recovery Plans for threatened species will also pose both a challenge and an opportunity (e.g. through access to funding programs that support conservation initiatives and monitoring for such matters) and should be included as a priority. We also recommend that the management of healthy Dingo populations outside the Dog Fence is both a challenge and an opportunity that should be included in the list given their ecological and cultural significance.

Pages 10 - 12: Theme 1: Maintaining Healthy Country

We support the specific reference to managing rare or threatened species within the Yellabinna parks on page 11, however recommend further detail is provided about how park management will address and implement priorities identified in these Recovery Plans. We also strongly support the control of pest plant species, such as buffel grass in both Yellabinna and Warna Manda parks, African boxthorn and beach daisy, which are not currently widespread within the Warna Manda parks. We recommend the plan also acknowledge that the parks and reserves covered in this plan lie within Zone 3 of the South Australian Buffel Grass Strategic Plan where the aim is to significantly reduce the extent of buffel grass by locating and destroying all infestations aiming for local eradication at feasible sites. This will link in better with the 3rd dot point under Objectives and strategies.

We strongly suggest that adequate, long-term flora and fauna monitoring that enables the successful management of the values identified in 'what are we looking after?' be added as a strategy on page 12.

As mentioned earlier, we suggest that the management of healthy Dingo populations in these parks is both a challenge and an opportunity. We suggest that the Dog Fence be marked on the maps provided in the plan and that the ecological (as well as cultural) significance of the Dingo be acknowledged. For example, there have been a number of studies in South Australia into the effects of wild dogs on suppression of populations of mesopredators such as feral cats and foxes that have shown benefits to threatened mammal species. This should be acknowledged in this section of the plan and relevant references for this should be cited. The plan should also refer to the SA Wild Dog Strategic Plan accessible at http://www.pir.sa.gov.au/data/assets/pdf_file/0006/285252/Wild_Dog_Strategic_Plan.pdf

Page 13: Theme 2: Keeping culture strong

We acknowledge the Far West Coast Aboriginal people's continuing connection to country and strongly support Theme 2. As mentioned earlier, given the combination of traditional and non-traditional hunting methods, we strongly support the dot point regarding the monitoring of species to ensure sustainable take.

Page 15: Theme 3: Respecting and enjoying Country

We acknowledge that Yellabinna and Warna Manda parks have special meaning to many people, in addition to Far West Coast Aboriginal people, and support visitation and use that does not negatively impact natural and cultural values. We note, however, there is potentially some inconsistency with the information in this section and Theme 1: Maintaining Healthy Country that makes reference to some of the potential impacts of visitation, for example identifying the importance of "reducing new track development which affects native vegetation and can allow pests to enter, or ... managing feral predators around sensitive sites such as rock holes". We recommend that this is also acknowledged under Theme 3.

We also recommend that the key aim of the Objective and strategies i.e. "Ensure that the range of experiences that can be enjoyed in the parks is maintained and expanded" is amended to acknowledge that any expansion of visitor experiences is done with careful consideration of sensitive cultural sites and conservation values.

Page 16: Theme 4: Yellabinna Wilderness Protection Area Visitor Management Strategy

We support visitation to the Yellabinna Wilderness Protection Area (WPA) that is compatible with protecting its natural values and management in accordance with the *South Australian Code of Management for Wilderness Protection Areas and Zones*. We recommend this section of the plan contain further information about the key issues associated with visitor management to the Yellabinna WPA despite the low visitation rates for example firewood collection, campfires and unregulated four-wheel drive access. This section of the plan should also acknowledge the significant natural and cultural values within the Yellabinna WPA to ensure that they are maintained and protected as part of the visitor management strategy.

NCSSA comments on the Nullarbor Parks Draft Management Plan

Page 2: Developing this draft plan

We recommend that the plan include a statement to clarify that its intended purpose is not to specify strategies to address all issues confronting these parks and reserves but that it seeks to provide an overview of management arrangements and outline key priorities for long term management. Similar wording has been used recently in a number of park management plans such as that for Innamincka Regional Reserve. Given that all park management plans are now moving towards this generic format we believe that it is useful to clarify these points.

Pages 3 - 4: Directions for Management

We strongly support the proposal for management of the Nullarbor WPA to avoid development of any new infrastructure and any further alteration of the landscape.

Given that the Nullarbor Regional Reserve (RR) already comprises 68% of the total area within the Nullarbor parks we do not support the proposal for the small remnant of the original Nullarbor National Park to be incorporated in to the Regional Reserve without any further justification of why this would occur. We strongly recommend that the remnant of the National Park is added to the Nullarbor WPA rather than the Nullarbor RR that would result in the WPA covering only 32% of the entire area.

We suggest that the schedule for monitoring and evaluation of this plan be included under Directions for Management, including the timing of when this will take place. We understand that the *Far West Coast Healthy Country Plan*, which underpins this plan, is supported by a work plan and a monitoring plan so review of this plan could be based on those. NCSSA requests periodic updates on how the strategies in this plan are being implemented and if they are achieving the expected outcomes.

Page 5: Significance and purpose

We commend the Nullarbor Parks Advisory Committee for acknowledging the importance of the Nullarbor WPA to South Australia's land managed for the highest level of conservation protection and important contribution to the National Wilderness Inventory. Although the last paragraph in the left hand column acknowledges the connectivity between the Nullarbor parks and adjoining areas managed for conservation, we recommend that the last sentence further emphasise the importance of this interconnection with other protected areas in terms of how this may assist in providing resilience to the effects of climate change.

Page 7: What are we looking after?

We strongly support the inclusion of flora and fauna of conservation significance as an important priority for management of the Nullarbor parks and recognition that the area provides habitat for the largest population of the Southern Hairy-nosed Wombat in Australia. We recommend that the endemic Hill's Emu-bush *Eremophila hillii* is also included as a flora species of significance within the Nullarbor parks. We strongly recommend that a complete list of the species of conservation significance, as listed under both the *Environment Protection and Biodiversity Conservation Act 1999* and the *National Parks and Wildlife Act 1972*, is included as an appendix in the plan.

Page 8: What are the challenges and opportunities?

We acknowledge the challenges posed by the management of pest plants and animals within the Nullarbor parks given their remoteness and inaccessibility. We strongly recommend that the management of threatened species to ensure their long-term conservation is a significant challenge (including the Plains Wanderer, and other species listed on page 7), particularly in response to climate change, and that it should be specified in this list as an additional dot point. The delivery of conservation priorities identified in various Recovery Plans and strategies for

threatened species will also pose both a challenge and an opportunity (e.g. through access to funding programs that support conservation initiatives and monitoring for such matters) and should be included as a priority.

We support the third dot point ensuring that the use of resources by the Mirning people and other Far West Coast Aboriginal people is conducted in a sustainable manner, particularly given the combination of traditional and non-traditional hunting methods that are now utilised. We also support the management of fire in the landscape as a key challenge in managing the Nullarbor parks, particularly in response to climate change.

The management of healthy Dingo populations outside the Dog Fence is both a challenge and an opportunity that should be included in the list given their ecological and cultural significance.

Pages 9 - 10: Theme 1: Maintaining Healthy Country

We recommend the statement that the “the parks have protected the area for several decades allowing natural processes to occur” requires further clarification. Although this is true in relation to grazing by stock, the grazing impact of rabbits continues to occur despite the proclamation of the parks and reserves. The management plan should acknowledge the effects of the myxomatosis virus and Rabbit Haemorrhagic Disease (RHD) on rabbit populations over the past century as these vectors are likely to have contributed to fluctuations in rabbit numbers and subsequent grazing impacts.

We strongly support the need for management of the Nullarbor parks to focus on species with national and state conservation ratings. We suggest that the sentence at the bottom page 9 referring to the management of the Nullarbor WPA in alignment with the Recovery Plan for the Plains Wanderer requires amendment. It is highly likely that habitat for the Plains Wanderer also occurs within the Nullarbor RR. We recommend that the plan acknowledge this and, rather than just the WPA being managed in accordance with the Recovery Plan, state that all the Nullarbor parks will be managed in accordance with the Recovery Plan. The wording of the conservation status of the Plains Wanderer could be streamlined to the nationally and state-rated Plains Wanderer – given that the actual ratings will be included in the Appendix. This comment also applies to the threatened flora mentioned on Page 10.

We strongly support the statement that Buffel grass is of particular concern in the Nullarbor Parks and the need for ongoing monitoring and control in accordance with the South Australian Buffel Grass Strategic Plan and Alinytjara Wilurara Buffel Grass Operational Strategy.

Although we acknowledge the need for access to maintain telecommunications infrastructure within the area, we recommend the plan refer to the Environmental Best Practice Guidelines for this type of work and acknowledge the potential threat that such activities pose to the nationally rated *Microlepidium alatum* as outlined in the Draft recovery plan for 23 threatened flora taxa on Eyre Peninsula (Pobke, 2007). Roadside and easement work failing to comply with Environmental Best Practice (EBP) could result in physical disturbance that could cause localized species extinction. Due to the small population size, all habitats and individuals are critical to the survival of this species.

Although we acknowledge that fire is a natural part of the ecology of the Nullarbor parks we recommend this paragraph also note the impact that inappropriate fire regimes can have on native vegetation communities. The impact of large bushfires on environmental assets should also be acknowledged.

Page 10: Objective and strategies

We recommend the inclusion of an additional strategy that addresses the management of rare and threatened species that occur within the Nullarbor parks in accordance with relevant Recovery Plans and strategies. We also recommend that the 6th dot point in this section include the protection of key environmental assets.

Pages 13-14: Theme 3: Respecting and enjoying Country - Objective and strategies

We recommend the inclusion of an additional strategy that addresses the need to ensure that the impact of visitor and other infrastructure development has minimal impact on rare and threatened species.

Page 15: Theme 4: Nullarbor Wilderness Protection Area Visitor Management Strategy

We support visitation to the Nullarbor WPA that is compatible with protecting its natural values and management in accordance with the *South Australian Code of Management for Wilderness Protection Areas and Zones*. We recommend this section of the plan contain further information or at least some examples of the key issues associated with visitor management in the WPA despite the low visitation rates. For example, the impacts of firewood collection, campfires and unregulated four-wheel drive access in the area should be noted. This section of the plan should also acknowledge the significant natural and cultural values within the Nullarbor WPA to ensure that these values are maintained and protected as part of the visitor management strategy.

Reference

Pobke, K. (2007). *Draft recovery plan for 23 threatened flora taxa on Eyre Peninsula, South Australia 2007-2012*. South Australia: Department for Environment and Heritage. Available from:

http://www.environment.sa.gov.au/managing-natural-resources/Plants_Animals/Threatened_species_ecological_communities/Recovery_planning/Plans_for_threatened_plants_in_SA.