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Amy Allen  
Policy Officer  
Protected Areas Unit  
GPO Box 1047  
ADELAIDE, SA 5001

Thursday 11 April 2019

**Re: Lake Gairdner National Park Draft Management Plan 2019**

Dear Ms Allen,

The Nature Conservation Society of South Australia (NCSSA) appreciates the opportunity to comment on the draft management plan for Lake Gairdner National Park. 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 provides specific comments on the Lake Gairdner National Park draft management plan on the following pages. If you would like to clarify or discuss this point please contact me on (08) 7127 4633 or via email at [julia.peacock@ncssa.asn.au](mailto:julia.peacock@ncssa.asn.au).

Yours sincerely,

Julia Peacock  
Nature Advocate

## **NCSSA comments on the Lake Gairdner National Park draft management plan**

NCSSA recognises the strong cultural ties that Gawler Ranges Aboriginal people have to the country covered by this Plan and strongly supports the co-management approach in place for this Park.

### *Page 1: Developing this draft plan*

We recommend that the final Plan include a statement to clarify that its intended purpose is not to specify strategies to address all issues confronting the Park but rather 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, including for Innamincka Regional Reserve. Given that all park management plans are now moving towards a simpler, more generic format, we believe that it is useful to clarify its intended purpose.

### *Page 4: Park Significance and Purpose*

This is a good summary of the important features of the Park.

### *Page 6: What are we looking after?*

We recommend the Plan acknowledge that the Gawler Ranges area was historically an extremely important refuge for the Night Parrot (*Pezoporus occidentalis*) with many specimens collected by Mr F. W. Andrews, a naturalist collecting for the South Australian Museum in the late 1800's. It is quite possible that this species still persists in suitable habitat that includes *Triodia* Hummock Grasslands and Samphire assemblages such as occurs around some parts of the edges of the salt lakes, therefore these areas should be a focus for future management.

There is a comma that needs deleting after 'wild violet' in the eighth dot point.

### *Page 7: What are the challenges and opportunities?*

In addition to those identified in the current draft Plan, we strongly suggest that the management of threatened species to ensure their long-term conservation is a significant challenge (including those listed on page 6), particularly in response to climate change, and that it should be specified in this list as an additional dot point.

We also recommend that the challenges posed in the management of pest plants and animals within the Park is acknowledged given its remoteness and inaccessibility.

### *Theme 1: Looking after Country*

This section provides a good summary of the importance of the Park for Gawler Ranges Aboriginal people.

Page 9: A minor editorial correction is to add the word 'be' in the first sentence of the first paragraph on this page, so it reads '...cultural sites may be shared with visitors...'. The 6th paragraph should acknowledge that the Ooldea Guinea-flower is listed as nationally vulnerable under the *Environment Protection and Biodiversity Conservation Act 1999*. It should also reference the historic records of the Night Parrot, as mentioned earlier in these comments. It is pleasing to see that the insect diversity of the lake is given particular attention in this section.

Page 10: Paragraph 3 refers to the joint proclamation and rights for resource exploration and development under the *Mining Act 1971* or the *Petroleum Act 1940*. We suggest it would be more appropriate for this information to be included under 'Theme 2: Enhancing the visitor experience and enabling appropriate access'. We also suggest that it may not be practical for exploration and development activities to be regulated such that "they do not have impacts", as any type of exploration or development will impact on the Park, no matter how well regulated.

We also recommend that this section acknowledge the risk that large-scale bushfires pose to biodiversity as well as life and property.

*Page 10: Objectives and strategies*

We recommend the 2nd sentence of the last dot point is amended to: Continue to build on control programs for feral herbivores and pest plants in collaboration with neighbours and the SAAL NRM Board to support the conservation values of the park.

We also recommend that the Management Plan include a list of flora and fauna species of conservation significance that occur within the Park as an Appendix.

*Theme 2: Enhancing the visitor experience and enabling appropriate access*

We strongly support the monitoring of impacts of events such as dry lake racing on the Park. Particularly if the Park is being accessed for commercial events, the costs of enabling appropriate monitoring should be borne by those benefiting from that access.