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West Kangaroo Island Parks Management Plan Submissions
Department for Environment and Water
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Thursday 10 September 2020

Re: Pre-submission on Cape Bouguer, Cape Gantheaume, Cape Torrens, Ravine des Casoars and Western River Wilderness Protection Areas on Kangaroo Island

To whom it may concern,

The Nature Conservation Society of South Australia (NCSSA) appreciates the opportunity to provide a pre-submission to the management plan development process for the five Wilderness Protection Areas on Kangaroo Island. Since 1962, the 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.

The NCSSA would like to take this opportunity to emphasise that the *Wilderness Protection Act 1992* 'provide(s) for the protection of wilderness and the restoration of land to its condition before European colonisation'. Therefore, a new, unified plan for these five Wilderness Protection Areas (WPAs) on Kangaroo Island should make clear the aim of protecting these Areas is for their outstanding wilderness quality, as well as identifying the management actions that need to be undertaken to restore these areas, as far as possible, to their pre-European colonisation condition.

The new plan should also enunciate the many reasons why protecting these large, intact natural ecosystems is important, including in light of a changing climate since they provide opportunity for the migration and adaptation of species as the planet warms in a way that smaller reserves do not.

The new plan should reflect that these WPAs are to be managed in accordance with the Wilderness Protection Areas and Zones Code of Management, which stipulates the need to 'maximise the naturalness and remoteness of wilderness areas'.

For each WPA, the NCSSA suggests the new plan should specifically address:

1. **Protection of biodiversity**, including the presence and abundance of species of particular conservation concern, such as the Kangaroo Island Dunnart and Kangaroo Island Echidna, and the actions that will be undertaken to protect these species and, as far as possible, return them to their pre-European colonisation abundance and range,

2. **Management of threats** to wilderness and biodiversity values, including the actions needed to adequately control pest plant and animal species,
3. **Management of fire**, particularly noting that the Code stipulates that 'Fire management will be based on continuing research into the fire history of the area, the relationships between fire and the natural communities occurring within the area, and on the maintenance of wilderness quality',
4. **Visitation management**, to ensure visitation is low impact and does not detract from the wilderness value of these areas, whilst also providing for opportunities to appreciate and learn about these areas,
5. **Water quality**, particularly for those WPAs that include wild rivers,
6. **Protection of heritage features**, both Indigenous and European, and
7. **Regular biodiversity monitoring**, to inform and improve future management.

The NCSSA suggests the new plan should identify the resources required for its implementation, as well as a timeframe for review, to ensure it is effectively followed and improved on in future iterations.

The NCSSA notes that two additions were made to the Cape Torrens WPA in 2018 and 2019 respectively. The NCSSA encourages the Department for Environment and Water to continue to review the opportunities to extend protection under this Act to other areas on Kangaroo Island (and throughout SA), where they retain outstanding wilderness quality.

If you would like to clarify or discuss this submission please contact me on 0400 277 423 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 placed on a light yellow rectangular background.

Julia Peacock
Nature Advocate