



5 Milner Street,  
Hindmarsh SA 5007

Phone: (08) 7127 4630

Fax: (08) 8231 9773

Website: [www.ncssa.asn.au](http://www.ncssa.asn.au)

Email: [ncssa@ncssa.asn.au](mailto:ncssa@ncssa.asn.au)

Department for Environment and Water  
National Parks and Protected Area Program  
GPO Box 1047  
Adelaide, SA 5001  
[DEWProtectedAreaManagement@sa.gov.au](mailto:DEWProtectedAreaManagement@sa.gov.au)

Thursday 27 July 2023

**Re: Submission on the South East Coastal Lakes (SECL) Project**

To whom it may concern,

The Nature Conservation Society of South Australia (NCSSA) appreciates the opportunity to make a submission to the Department for Environment and Water's *South East Coastal Lakes Project*, which proposes changes to the management of five lakes adjacent to South Australia's south-east coast.

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 has a long history of advocating for the creation and effective management of National Parks and other protected areas. The organisation supports the principle of increasing the area of land and waters under effective protection. In this submission NCSSA wishes to stress the importance of not just creating protected areas, but actively managing them to protect natural values, and adequately resourcing their management.

### **Content of this submission**

This submission addresses several issues arising from DEW's proposal document for the management of the SE lakes:

- the **purpose and expected benefits to conservation** of converting areas of unalienated Crown Land to Parks land
- relationship of the proposal to a **Native Title** claim
- **potential impacts of petroleum and gas exploration** on the SE lakes region that are not addressed in the proposal document.

### **Purpose & expected benefits to conservation**

Protected areas are generally created to increase protection from the impacts of alternative land-uses that would otherwise threaten an area's natural values. In this case **it is not clear what significant threats are being addressed**. Most of the proposed management actions appear minor, and relate to infrastructure such as picnic sites, camping sites and boat launching areas.

It is also uncertain whether DEW/NPWS have adequate resources to fund the active management of any newly created Parks areas. **NCSSA urges better government resourcing of NPWS to enable active management of all Parks**, not merely the creation of more Parks.

### ***Threatened species***

The lakes and surrounding habitats are home to a number of threatened species as highlighted in the proposal document, including the Critically Endangered Orange-bellied Parrot. However, **it is not clear whether, and how, any of these species is threatened by current land-use**, and it is therefore not possible to judge whether they will benefit from any of the proposed management actions.

NCSSA suggests that more work needs to be done **to identify and mitigate any specific threats to threatened species** in the lakes region, regardless of any changes to land use type.

### ***Hunting***

Potentially the most consequential change to current land-use that would occur from creating new areas of National Park or Conservation Park would be the banning of recreational hunting in those areas. The proposal document states that it seeks to strike a balance between community desire to continue hunting activities while setting aside more land and water for conservation and other recreational activities.

NCSSA does not oppose recreational hunting on principle, so long as it can be done sustainably, as outlined in a recent submission to the Parliamentary Select Committee on the Hunting of Native Birds. Again, NCSSA wishes to re-emphasise that **hunting is not the greatest threat to waterbird conservation in South Australia – loss of habitat is**. Permanent hunting bans are not the most effective way to conserve the State's waterbirds; wetland restoration and increased river-flows are.

### ***Native Title claim***

The South East coastal lakes area overlaps with the region's first Native Title claim, by the *First Nations of the South East*, which was submitted in 2017<sup>1</sup> and is still in progress.

DEW's proposal document states that no action will be taken to implement the SE lakes proposal until the Native Title claim is finalised. However, the timescale for resolving the Native Title claim is unknown and is outside of DEW's control.

The proposal does not therefore guarantee that any threats to the conservation values of the lakes region will be managed on a relevant timescale. If there are any **urgent conservation concerns** relating to the lakes region, these **should be managed in a timely manner regardless of the proposal**.

Despite acknowledging the Native Title claim, and stating that First Nations groups were consulted as part of the process of developing the SE lakes proposal, the proposal does not discuss what the implications would be for Native Title interests for areas converted from Crown Land to Parks land. Would any rights of Native Title holders be extinguished in this scenario? This requires examination.

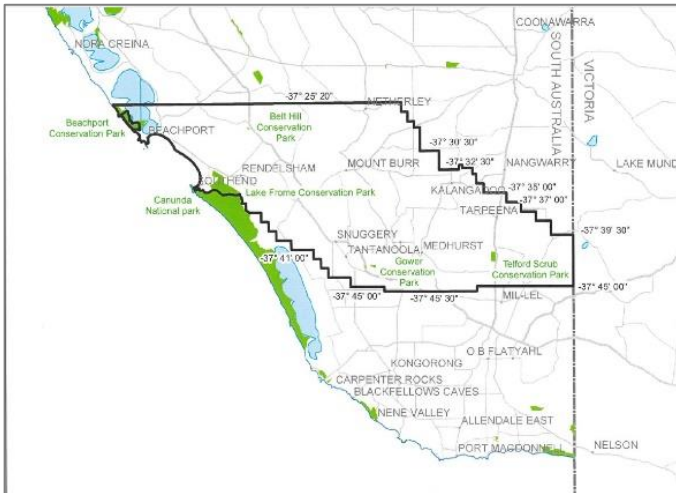
If there were no implications for Native Title holders, there would presumably be no reason to delay implementing the SE lakes proposal until the Native Title claim is settled. This suggests that the proposal may be contrary to the interests/desires of First Nations groups. NCSSA does not speak for the Native Title claimants, but stresses the importance of **adequate consultation with First Nations groups** on land-management issues that may affect them and their rights.

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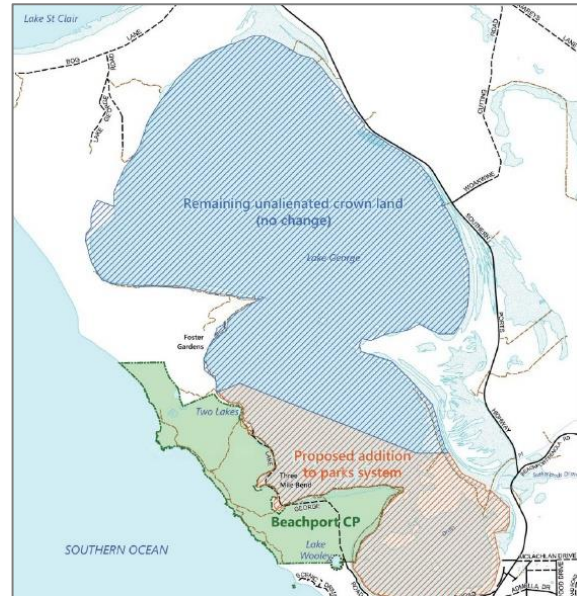
<sup>1</sup> <https://www.nativetitlesa.org/new-native-title-claim-for-the-south-east-of-sa/>

**Petroleum & gas exploration**

NCSSA notes that that some of the SE coastal lakes region is under, or adjacent to, a Petroleum Exploration License (PEL 680) area within the Otway Basin (Figure 1).<sup>2</sup> This is not mentioned in DEW’s SE lakes proposal document.



*Figure 1: Map of the South East of South Australia, showing Petroleum Exploration License 680 (outlined in black). Note that the north-western corner of the exploration area overlaps the southern half of Lake George.*



*Figure 2: Map of Lake George. Note that the southern half of the lake (currently within the area of PEL 680) would be converted to National Park under DEW’s proposal for the SE lakes*

However, NCSSA does note that the southern half of Lake George, which directly overlaps PEL 680, would be converted to Conservation Park under DEW’s proposal (Figure 2). The implications of PEL 680 for the proposed new section of park are not clear. This requires clarification by DEW.

It is unknown to NCSSA whether petroleum/gas exploration, or possible future extraction activities, within the Otway Basin are likely to have a negative impact on the SE lakes region.

If petroleum/gas exploration or extraction could have an equal or greater impact on the natural and cultural values of the lakes region than current recreational activities, the SE lakes proposal may be irrelevant unless mining impacts are addressed.

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

<sup>2</sup> Department for Energy and Mining. Memorandum, 24 June 2021. Petroleum Exploration License PEL 680. REF: MER-2020/0123

