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Cc: Hon Ian Hunter MLC, Minister for Sustainability, Environment
and Conservation
Ms Sandy Pitcher, Chief Executive, Department of
Environment, Water and Natural Resources

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Management Plan Draft Amendments 2016

Dear Peter

Thank you for the opportunity to provide comments after the official close of submissions.

The management plan draft amendments appear to have been developed with very little regard for many of the objectives that management plans are required to address, eg:

- (a) the preservation and management of wildlife
- (c) the preservation of features of geographical, natural or scenic interest
- (d) the destruction of dangerous weeds and the eradication or control of noxious weeds and exotic plants
- (e) the control of vermin and exotic animals
- (f) the control and eradication of disease of animals and vegetation
- (g) the prevention and suppression of bush fires and other hazards.

Instead, a key driver for the amendments seems to have been (h) the encouragement of public use and enjoyment of reserves.

We understand and support the push to improve the community's connection to nature; in fact we run a program called Connecting Community to Nature that is designed to do exactly this. However we are very aware of the potential conflicts between conservation objectives and increased public use and enjoyment of parks. For these conflicts to be managed, they must be acknowledged and steps taken to protect significant conservation assets in our parks system.

However in some cases, the proposed amendments remove any acknowledgement of these potential conflicts.

For example, on p 16 it is proposed to replace text saying:

Dog-walking is not considered to be a suitable activity in Hallett Cove Conservation Park and is therefore not permitted in this park. Prevention of this activity assists in the protection of fragile landforms and native fauna such as bird and reptile species. For example, permitting dog-walking in native habitat has been found to significantly reduce the diversity and abundance of bird species (Banks and Bryant, 2007). There are more than ten parks or public areas within close proximity of Hallett Cove Conservation Park where dogs can be exercised.

with:

The foreshore trail that passes through Hallett Cove Conservation Park is popular for walking. Walking dogs on a lead on this trail is not expected to have a significant impact on the landforms or native fauna of the park.

There is nothing in the proposed text to indicate that dog-walking no longer poses a threat to bird diversity and abundance, and no explanation for how this conclusion was reached. This approach gives no confidence that new activities in parks will be appropriately managed.

The impression that the public use objective may be trumping conservation objectives is reinforced by amendments proposing new activities even in conservation zones within parks, or removal of those zones altogether.

We are also very concerned about the level of resources available to the department to manage the park system. Adequate resources must be allocated to ensure on-going monitoring, especially in these parks given the potential for conservation assets to be degraded.

We recommend:

- Amendments to park management plans must maintain regard for conservation objectives in the NPW Act.
- Risks of new activities or increasing visitor numbers must continue to be acknowledged and addressed in management plans.
- Risks should be minimised by excluding new/increased activity from conservation zones.
- Conservation zones should not be removed.
- Decisions about new activity/increased visitation must be informed by conservation science.
- Adequate resources must be allocated to ensure a rigorous and long term monitoring program which can assess the environmental impacts of increased usage of tracks and trails. This will also inform future decisions regarding recreational use and management within these parks.

We have received anecdotal feedback from community members that work on infrastructure upgrades in some parks may have started already. We would appreciate advice on this matter.

Finally, we note that under s 38 of the National Parks and Wildlife Act, after the close of consultation, the Minister must refer the plan and any comments received to the Parks and Wilderness Council for its consideration and advice. Given this Council has not yet been constituted, what alternative arrangements are in place to maintain normal checks and balances?

Yours sincerely,



Craig Wilkins
Chief Executive