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Thursday 16 December 2021

**Re: Comments on the draft management plan for Parks of Western and Central Kangaroo Island**

To whom it may concern,

The Nature Conservation Society of South Australia (NCSSA) appreciates the opportunity to provide comment on the draft management plan for 15 parks in western and central 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. Specifically, the NCSSA has a long history of both monitoring and advocating for the protection of Kangaroo Island's biodiversity, including by campaigning for the Gosse Crown Lands to be added to Flinders Chase National Park in the 1980s and supporting the first survey of the endangered Kangaroo Island Dunnart in the 1990s.

For the past two years, the NCSSA has led community projects investigating the impacts of the 2019-20 bushfires on threatened, endemic flora on Kangaroo Island. NCSSA was also the first to identify the issue of Tasmanian Blue Gum seedlings encroaching from plantations into reserves and areas of remnant native vegetation and has made a major contribution to control efforts.

As stated on YourSAy, "A key direction for the plan is to balance the preservation of native vegetation and vulnerable ecosystems while also enabling visitors to experience the natural wonders and wilderness qualities of the island" (emphasis added). The NCSSA does not believe the appropriate 'balance' has been struck, particularly with respect to proposed zoning within Flinders Chase National Park (and all other parks protected under the *National Parks and Wildlife Act 1972* to be covered by this plan), since no areas would be fully protected from the development of visitor infrastructure under the plan as currently drafted.

Please find further comments attached. 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](mailto:julia.peacock@ncssa.asn.au).

Yours sincerely,

Julia Peacock  
Nature Advocate

## **NCSSA comments on the Parks of Western and Central Kangaroo Island Draft Management Plan - 2021**

For clarity, the parks covered by the draft plan are as follows:

- National Parks - Flinders Chase
- Conservation Parks - Kelly Hill, Latham, Mt Taylor, Parndana, Seal Bay, Seddon, Vivonne Bay, Beyeria and Cape Gantheaume
- Wilderness Protection Areas - Cape Bouguer, Cape Gantheaume, Cape Torrens, Ravine des Casoars and Western River.

### **Directions for management (page 3) - Proposed zoning is inadequate to protect natural values**

The NCSSA is deeply concerned that there is no proposed zoning that will fully protect the natural values of parks declared under the *National Parks and Wildlife Act 1972* to be covered by this plan.

Rather, the draft plan specifies various Visitor Use Zones, several of which will enable the Australian Walking Company to build private, luxury accommodation in Flinders Chase National Park (see boxed text). Everywhere else will be zoned for 'low impact' visitor facilities such as camping areas, trails, shelters, toilets and barbecues.

This proposed zoning is a major departure from current practice. The 1999 management plan for Flinders Chase National Park (and three other park areas) identified:

1. major development zones (for park administration, staff accommodation etc),
2. minor development zones (for camp sites, toilets, interpretive signage etc) and
3. limited access zones, which are areas not zoned for development that may be managed for their high conservation value or for visitor safety.

The NCSSA contends that 'low impact' visitor facilities can, in fact, have major impacts on natural values. This is both in terms of direct clearance of habitat for facilities and trails, but also by enabling the introduction of pest plant species and diseases, as well as pest animal species that can use tracks to disperse. As currently drafted, the plan will enable the development of visitor facilities to occur anywhere within Flinders Chase National Park, and well as the nine other conservation parks declared under the *National Parks and Wildlife Act 1972* to be covered by this plan.

This is inappropriate since these parks are to be managed primarily for conservation and therefore any management plan should provide clear guidance as to the areas in which development would be contemplated.

It is also disappointing to see the draft plan explicitly stating that the zoning is not related to the *Planning, Development and Infrastructure Act 2016*. The NCSSA believes the State Government should be working towards a more harmonised system of land management, where park plans clearly identify the conservation values of protected areas and are then formally adopted under the *Planning, Development and Infrastructure Act 2016*.

### **Significance and purpose (page 7)**

The NCSSA supports identifying the threatened species and the threatened ecological community protected within the parks to be covered by this plan, but also believes reference to the ecological importance of large, intact ecosystems should be included.

### **Challenges and opportunities (page 10)**

The NCSSA suggests amending the dotpoint relating to fire as follows:

- Managing the risk of bushfire to the community [and biodiversity](#)

The NCCSA strongly supports improving knowledge of flora and fauna to inform conservation management.

The NCCSA is concerned about the dotpoint “*providing scope for commercial tourism businesses to develop new nature-based tourism ventures that enhance and support the natural characteristics of the park*”. As outlined earlier with respect to proposed zoning, no guidance is given in the draft plan as to the appropriate siting of any infrastructure that would be required for new tourism ventures.

Also, the plan does not specify any requirement for such ventures to be affordable for the general public, nor does it specify any required financial return to be provided to the park from such ventures (noting on page 19, the draft plan states a Conservation Dividend ‘*may be required*’ that would be used for approved conservation programs in these parks).

**Box 1: Why a strong, clear management plan is critical – the sad story of private, luxury development within Flinders Chase National Park**

The idea to ‘develop accommodation or guided tours on the Kangaroo Island Wilderness Trail’ was put forward in the ‘Nature Like Nowhere Else’ nature-based tourism strategy under the Weatherill Government, and the Australian Walking Company was selected as the preferred provider and awarded a grant in the order of \$800,000 to ‘further develop the concept’.

The original concept for this accommodation was that it would be located along the Kangaroo Island Wilderness Trail, and the park management plan was amended in 2017 to facilitate this. However, rather than being ‘along the trail’, siting for two of the proposed accommodation areas was several kilometres remote from the trail, apparently influenced by the desire for sea views.

The disparity between the original concept for the accommodation and the siting sought by the Australian Walking Company was clearly inconsistent with the park management plan.

The approvals granted to this proposal, under both the land-use planning legislation as well as legislation to protect native vegetation, were subject to a legal challenge from a local conservation group.

In response, the Marshall Government introduced a special regulation to allow for developments of over \$1m in Flinders Chase National Park to bypass the usual approval requirements, and then immediately approved revised plans for the accommodation.

Although the revised plans are closer to the original intent for the siting of the accommodation, on balance, the value of this private development in an environmentally sensitive, protected area to the wider community is still questionable. Worryingly, the current Environment Minister stated the Marshall Government would keep the regulation “in our back pocket” in case it was needed for other developments.<sup>1</sup>

Encouraging private, luxury accommodation to be built within Flinders Chase National Park sets a dangerous precedent regarding private development within South Australia’s public parks. The financial returns to, as well as environmental and financial costs to, the public from such developments should be thoroughly reviewed.<sup>2</sup>

Best practice for protecting natural values would be to site private, luxury accommodation outside the park. For example, the nearby Southern Ocean Lodge will provide a nearby, high-end accommodation option, once rebuilt. The KI Wilderness Trail could then be accessed by vehicle tracks for day walks for those who do not wish to camp.

<sup>1</sup> <https://www.abc.net.au/news/2021-02-09/kangaroo-island-pods-find-common-ground-but-was-there-a-choice/13136516>

<sup>2</sup> [https://www.abc.net.au/news/2021-11-27/government-pays-three-capes-walk-marketing/100654838?utm\\_campaign=abc\\_news\\_web&utm\\_content=facebook&utm\\_medium=content\\_shared&utm\\_source=abc\\_news\\_web&fbclid=IwAR23xaxKf4EBEPeYiAC1li1RpnHfCQ5J4h4gXx71CjDfWAbTBk8bAV7IeXU](https://www.abc.net.au/news/2021-11-27/government-pays-three-capes-walk-marketing/100654838?utm_campaign=abc_news_web&utm_content=facebook&utm_medium=content_shared&utm_source=abc_news_web&fbclid=IwAR23xaxKf4EBEPeYiAC1li1RpnHfCQ5J4h4gXx71CjDfWAbTBk8bAV7IeXU)

## Theme 1: Conserving wildlife and ecosystems (page 11 – 13)

The NCCSA strongly supports this management priority since it is the primary purposes for which these parks are declared. This section provides a high-level summary of key natural values protected by these park areas but needs to be improved by including the further detail and particularly by articulating threats to priority species. Kangaroo Island is home to 52 endemic plant species, 29 of which are rare or threatened. Almost all of these species occur in the parks covered by this management plan.

A number of these species are very localised and could be readily impact by any development. These risks should be acknowledged in the draft management plan and a commitment to avoiding them made. For example, *Logania insularis*, which is listed under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), is confined to Cape Borda and could be potentially significantly impact by further tourist development aimed at 'enhancing visitor experiences', as proposed in the draft management plan.

The rare sedge *Gahnia halmaturina* is presently being assessed for listing as threatened under the EPBC Act. The species is totally confined to the creek system leading into West Bay, so any expansion of camping facilities, as suggested in the draft management plan, could potentially have a significant impact on this species.

The EPBC-listed *Asterolasia phebalioides* is confined on Kangaroo Island to just a single population which abuts Cape Borda Road. This population is currently being impacted by the fire break at the northern edge of Ravine des Casoars Wilderness Area where regular bulldozing is likely spreading *Phytophthora* along the length of the park. The action plan for this species identifies *Phytophthora* as a potential threat to this species.

The threatened forb *Asperula tetraphylla* is endemic to KI where it is confined to an area totalling less than a hectare on two river systems. While presently only state-rated it is shortly to be assessed for listing as threatened under the EPBC Act. The stronghold for this species is along Rocky River adjacent to the Kangaroo Island Wilderness Trail, in Flinders Chase National Park. Any upgrading of this trail, or associated developments, could easily eliminate this population of the species which is confined to a few small ephemeral oxbows lakes along the river. These areas are also highly vulnerable to weed invasion.

The NCCSA therefore strongly suggest that is essential that the threats to, and conservation requirements of, all priority species and populations of priority species in these parks be addressed in detail, at least in a publicly available appendix.

Having made a major contribution to Tasmanian Blue Gum seedling control following the 2019/20 bushfire, the NCCSA strongly supports the development and resourcing of a specific strategy to control this weed.

The NCCSA supports the proactive management of introduced Koalas, noting that current low population numbers following the fires may present an opportunity to more effectively manage the species.

The NCCSA supports the strategic management of Western Grey Kangaroo and Tamar Wallaby where their numbers impact on the conservation values of the parks, and concurs that total grazing pressure is a key issue.

The NCCSA strongly supports long-term monitoring to investigate the impact of climate change and other pressures on natural values.

The NCCSA does not support commercial apiary licences in the parks since introduced honey bees present a range of threats to natural ecosystems, including by competing with native species for nectar and pollen and by either not pollinating or pollinating native species inefficiently<sup>3</sup>.

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<sup>3</sup> <https://www.adelaide.edu.au/research/news/list/2020/02/24/buzz-off-honey-industry-our-national-parks-shouldnt-be-milked-for-money>

The NCSSA supports **Theme 2: Maintaining wilderness quality** for the Wilderness Protection Areas covered by this draft plan.

### **Theme 3: Creating exceptional visitor experiences**

The NCSSA supports a 'visitor hub' at the gateway to the western parks but is concerned about the foreshadowed increase in visitor infrastructure throughout the parks, particularly in the absence of any areas being protected from development within the parks declared under the *National Parks and Wildlife Act 1972* to be managed under this plan.

The NCSSA notes with concern the planned development of a 'walking and cycling strategy' and reiterates that even minor trails can impact negatively on natural values.

The statement '*operational infrastructure that supports the provision of exceptional visitor experiences will be located in Flinders Chase National Park and other locations as required*' on page 16 is concerningly broad. The NCSSA strongly advocates for this draft management plan to clearly outline the limited areas within these parks that would be contemplated for such infrastructure.

As outlined earlier in this submission, the target audience for the private, luxury accommodation at Sanderson Bay and Rocky River listed as an 'objective and strategy' on page 18 would be more appropriately catered for in accommodation outside Flinders Chase National Park.

### **Theme 4: Managing fire**

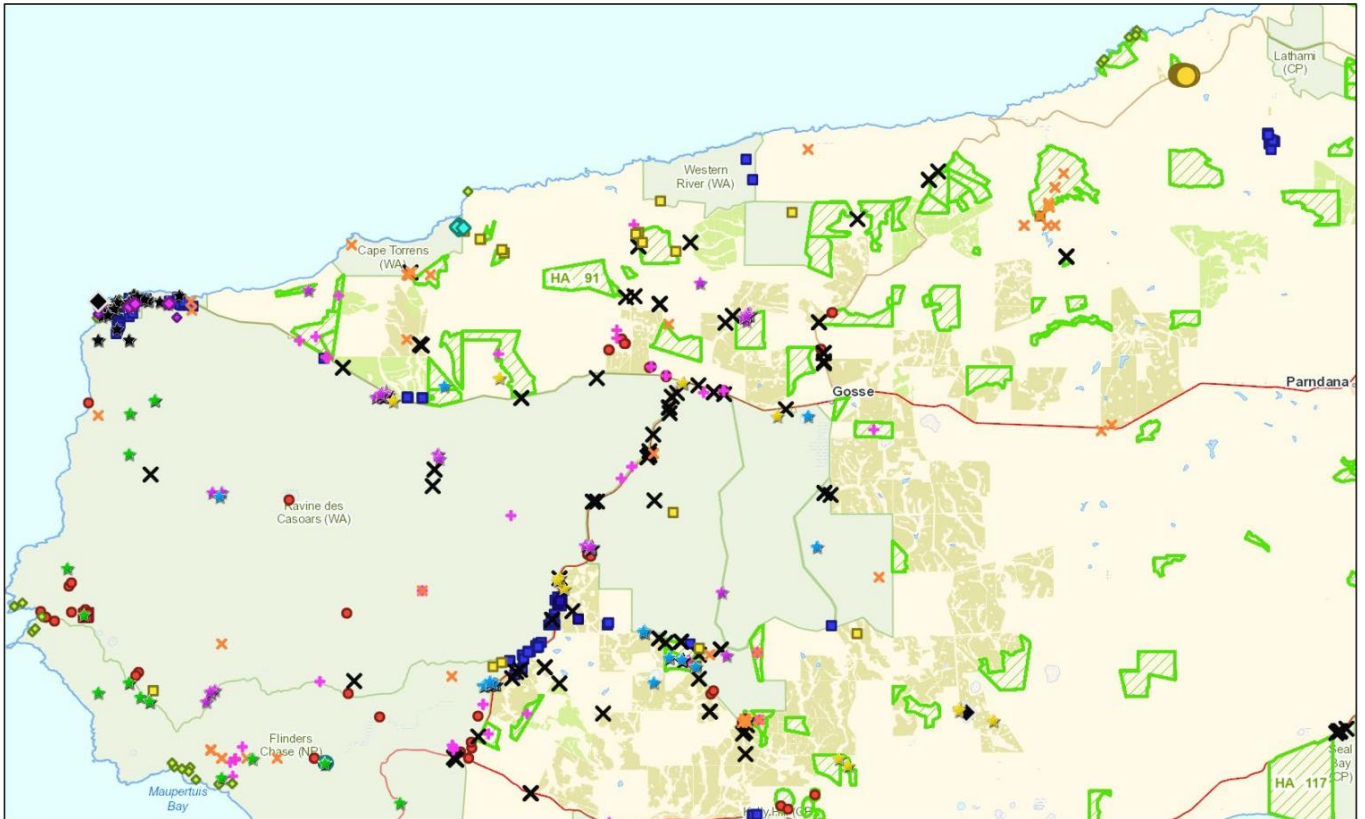
The management of fire in the landscape is a priority both for biodiversity and community safety. However, the NCSSA is concerned by the proposal to create five new permanent fire access tracks in Ravine des Casoars. This approach will encourage the introduction of disease, such as *Phytophthora cinnamomic* (Pc) (Figure 1), into the Wilderness Protection Area, and it therefore inconsistent with Theme 2: Maintaining Wilderness Quality.

Pc causes dieback in a wide range of plant species, including species endemic to Kangaroo Island (Vickery 1997)<sup>4</sup>. Vegetation with Pc dieback symptoms were first observed on Kangaroo Island in the late 1980s, confirmed in 1994 (Vickery 1997) and was most likely introduced through transfer of infested soil on vehicles or machinery from the mainland. Soil testing confirmed the widespread presence of Pc along roadsides and in western KI reserves in the late 1990s, however no widespread testing for Pc has since been conducted on KI.

As vehicles and machinery have been the primary vector for Pc spread on KI, it is reasonable to assume that it is largely absent from Wilderness areas such as the Ravine des Casoars.

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<sup>4</sup> Vickery, F. (1997) The distribution of *Phytophthora cinnamomi* on Kangaroo Island. PhD thesis, University of New England, Armidale.



**Figure 1** Locations of confirmed records of *Phytophthora cinnamomi* (X), Western KI<sup>5</sup>.

The access tracks proposed are unlikely to be effective if fires are spotting several kilometres ahead, and may be unsafe for personnel, particularly on days of catastrophic conditions.

The NCSSA supports increased firefighting capability, including through aerial suppression of fires before they become large and unmanageable.

<sup>5</sup> Adapted from Davies, R.J.-P., Bianco, B. and Reynolds, T (2021). Enhancing bushfire recovery of Kangaroo Island's rare and threatened, endemic flora on private land and roadsides. Final report for Australian Government's Wildlife and Habitat Bushfire Recovery program grants. Nature Conservation Society of South Australia, Adelaide.