

## **Who are Friends of Parks KI Western Districts?**

Friends of Parks KI Western Districts is a group of volunteers dedicated to making a real difference in the parks, reserves and private bushland on the western end of Kangaroo Island. This is the least developed part of the island and therefore contains the most extensive undamaged ecosystems including large areas with exceptional wilderness values. It contains many of the island's rare, endemic species and famous natural attractions.

Our group holds monthly working bees involving a number of long-term projects but also some one-off activities. We collaborate closely with other environmental and community NGOs, as well as the local KI Landscape Board and DEW.

Recent projects include:

- removing invasive Tasmanian blue gums with Trees for Life, the Kangaroo Island Conservation Landowners Association and the Nature Conservation Society SA
- Surveying, mapping and protecting threatened plant species with NCCSA
- Using motion-sensitive cameras to help monitor KI dunnart bushfire recovery with Landcare SA and Land for Wildlife
- Replanting drooping she-oaks to aid glossy black-cockatoo bushfire recovery with the KI Landscape Board and Landcare SA
- Mulching a native bush garden with the Emu Bay Progress Association
- Supporting the deployment and monitoring of pygmy possum and micro-bat nest boxes with Uni SA.

We have been successful in partnering in several bushfire recovery grants over the last two years. We have won awards for our work from the Department, Friends of Parks Inc. and the KI Council and individual members have been nominated for and won various awards for their environmental volunteering.

We currently have 30 active members.

# **Parks of Western and Central Kangaroo Island Draft Management Plan 2021**

## **Comments by Friends of Parks KI Western Districts**

This draft management plan is inadequate as a document for guiding the management of the 15 disparate National Parks, Conservation Reserves and Wilderness Protection Areas that are covered by it. There is almost no guidance on how the parks will actually be managed, but merely vague aspirations. It does not draw upon any of the vast catalogue of scientific knowledge about the conservation estate on western Kangaroo Island, and it has been put together with extremely limited consultation with the public and scientific experts. There is no review process outlined and hence no way of knowing in the future whether or not the plan is achieving its objectives, such as they are.

While the 'Reimagine' report emphasises that the primary purpose of the parks covered by this document is for conservation, it seems that the main driver for their management here is for economic return, both for the government and for private interests.

One of the great hallmarks of the parks of western and central Kangaroo Island is their wilderness values, which are scarce, precious and highly sought after globally. These values seem to be greatly undervalued in this document.

Wilderness values need to be identified, mapped, zoned as such and appropriately protected across the entire park estate. Only in this way can the increasing demands of visitation be met without compromising the very features that attract visitors in the first place.

It is far more important to get the plan done right than quickly. The Department needs to go back and start the process of developing this document again, this time by fully consulting the community, scientific experts and the voluminous scientific literature, while keeping as the first priority that all these parks were established primarily for the conservation of nature.

We will now go through the document systematically, making comments on the text in sequential order.

### **Developing this draft plan (page 2)**

The first paragraph under this heading states that: *'This plan provides strategic direction for the protection of the natural and wilderness values of the parks and wilderness protection areas'*. This is the critical role of the plan and all other activities must relate to and be subordinate to this key direction. This is the reason that all the parks covered under this plan were created in the first place.

This document does not provide for the objectives of management under the National Parks and Wildlife Act SA (1972) or the Wilderness Protection Act (1992). What was once a document that directed park management has become a vision statement, with no detail on natural and cultural asset protection or threat management actions. Specifically, the plan does not align with Part 3, Division 5, Section 38 4a and b of the NPWSA Act (72); and Part 3, Division 3, Section 31 5a, b and c and 32 a and b of the WP Act (92).

### **Question 1: Why does this document not directly align with the National Parks and Wildlife Act SA (1972) and the Wilderness Protection Act (1992)?**

It does not reference the current management plan for Conservation Parks of Kangaroo Island: Beatrice Islet, Busby Islet, Cape Hart, Cape Torrens, Dudley, Mount Taylor, Nepean Bay, Parndana, Pelican Lagoon, Seddon, Vivonne Bay and Western River Conservation Parks (1988). Despite its age and the changes to the

status of some of the reserves above, this is still the adopted plan for several of the parks named in the current draft on page 6.

**Question 2: What will be the status of the current management plan for Conservation Parks of Kangaroo Island given that some of them will now be covered under this new document?**

Community and scientific input into the development of the plan was not extensive – the meeting on Kangaroo Island on 4 February 2021 was for invited key stakeholders and was not promoted more generally.

**Question 3: What opportunities were given and by what means was the community able to contribute to the development of the draft plan? Why was there no extensive community consultation?**

**Question 4: Why was the scientific community and the voluminous relevant scientific literature not extensively consulted, or if they were why is it not evident in the content of this document?**

There appears to be a major disjunct between recommendations in the ‘Reimagine’ report and what is presented in this document. This document should be consistent with existing plans except for changes agreed to by the Reimagine groups.

**Question 5: Why were many recommendations from the ‘Reimagine’ group ignored in the production of this document?**

The management plan replaces six plans and amendments and covers 15 diverse parks and Wilderness Protection Areas. No justification for combining these parks and plans into one plan has been given and it was opposed by stakeholders in the initial planning discussions in July 2020. Most other recent park management plans (for example Cleland National Park) cover a single or two or three parks, not

multiple areas. Flinders Chase and Western KI parks could be addressed in one plan but not the additional disparate areas that are in the proposed plan.

**Question 6: Why was the unanimous stakeholder recommendation that all 15 parks not be lumped together in one plan ignored?**

**Question 7: What is the justification for lumping all these disparate parks into one plan?**

### **Directions for management (page 3)**

In the first paragraph it is stated that parks are managed to achieve the objectives of the *National Parks and Wildlife Act 1972* to ensure they are managed primarily for conservation. The emphasis should be on 'primarily for conservation' with the other listed uses as secondary.

This document demonstrates its lack of commitment to these principles through, to mention just three examples, inadequate development zoning, the proposal to introduce fire tracks into Ravine des Casoars WPA, and allowing for the introduction of commercial European honeybees.

The fourth paragraph refers to community participation. The community's confidence that it is valued, involved and listened to was significantly undermined by the dismissal of its strong opposition to building private accommodation within the park and locating it on unspoilt coastal headlands outside of the designated development zones.

**Question 8: What processes or structures are provided within the plan to ensure that the community's views will be sought, seriously considered and used to shape park management decisions, directions and developments within the parks?**

The fifth paragraph refers to the thoughtful siting of facilities to avoid disturbance of areas of high conservation value.

**Question 9: How is this statement consistent with the approved siting of Australian Walking Company accommodation on remote, unspoilt, prominent coastal headlands associated with the KI Wilderness Trail?**

Thoughtful siting of facilities within a park estate established primarily for conservation would restrict them to areas with existing anthropogenic disturbance, as strongly recommended in the 'Reimagine' report. There are a number of such sites that would be suitable for the Australian Walking Company building clusters.

**Question 10: What measures in the new plan ensure that this siting of facilities in areas of high conservation value will not occur again?**

Paragraph six refers to zoning and is extremely dangerous for what it allows to occur and what it does not rule out. Unlike previous management plans where zones for development were identified, this document's new zoning descriptions mean that any areas that are not designated as Visitor Use Zones (ie the entire rest of the park area) can still have 'low impact' uses, including picnic and camping areas, walking and cycling trails, ancillary facilities including shelters, toilets and barbecues. This statement effectively opens the entire park area for this infrastructure to be built. It completely undermines the conservation role of the parks. There is no evidence that this document will protect any areas in any of the parks from development should a future government be so inclined.

**Question 11: How can built infrastructure of the kind described be considered 'low impact' in areas managed "primarily for conservation"?**

**Question 12: How is built infrastructure of the kind described compatible with the stated strategic direction 'for the protection of the natural and wilderness values' of the parks?**

Limited Development or Visitor Use Zones should be identified in areas with existing anthropogenic disturbance, and development must be limited to those areas, as strongly recommended in the 'Reimagine' report. The 'low impact' uses described in Paragraph 6 can in fact have considerable impact and this document puts no constraints on the size or location of these areas, except for within Wilderness Protection Areas. In essence there are Visitor Use Zones and the rest is open for so called 'low impact' uses, which can, in fact, have considerable impact.

No areas are identified as 'no development zones'.

To be consistent with the 'conservation first' values expressed at the beginning of this document, the majority of the parks, and all areas with no existing disturbance footprint, should be zoned for no further development. The draft Cleland National Park Management Plan identifies four distinct zones, including a no-development zone. Are the magnificent and iconic parks of western and central Kangaroo Island considered of lesser conservation value than Cleland?

**Question 13: Why are there no zones in any of the parks identified as 'no-development zones' as is the case for Cleland National Park?**

Paragraph seven states that working with local partners is encouraged through this plan. The recently formed KI Parks Consultative Committee is already feeling the strain of the government's 'announce and defend' attitude with developments at Cape Willoughby sprung on the community with no prior consultation.

**Question 14: How is working with local partners going to be formalised within this management plan?**

**Question 15: How will disputes or disagreements with local partners over proposed management actions be arbitrated?**

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

### ***What are we looking after?***

While we support the items that are listed, missing from the list is the critical and global importance of the large, unfragmented areas of intact, functional ecosystems that exist in parks of western Kangaroo Island, particularly Flinders Chase National Park (FCNP) and Ravine des Casoars Wilderness Protection Area. This is something lacking or in limited supply elsewhere in South Australia, Australia as a whole and, in fact, the world, where wholesale land-clearance of temperate vegetation communities has taken place. Not only is this important as wildlife habitat, provision of ecosystem services and aesthetic value but also for the role vegetation plays in reducing the impacts of climate change.

### **Question 16: Why is the national and global significance of the vast, unfragmented ecosystems of western KI not emphasised?**

Admirals Arch and Remarkable Rocks are more than 'features', they are Geological Monuments.

Other comments about the items under 'What are we looking after?'

- Areas that are set aside for biodiversity conservation and functioning ecosystems should be included.
- Why mention only one threatened species in this list? Are sea-lions more valuable than other EPBC, NPAW or IUCN threatened species or just more profitable? What about the many endemic species and sub-species that are only found on KI or the biodiversity richness due to Island biogeography? Kangaroo Island is one of only 15 Biological Hotspots in Australia. These are the places on earth that are richest in biodiversity. Western KI is the most diverse location in South Australia for plant and fungus species.
- The whole island is a Key Biodiversity Area (KBA) which refers to sites contributing significantly to the global persistence of biodiversity in

terrestrial, freshwater and marine ecosystems. This is based on globally agreed criteria for the identification of KBAs worldwide by the IUCN. Weakening of protection bringing ecosystems under threat could lose this recognition.

- The west end reserves form a contiguous block of native vegetation, which following the Black Summer wildfires will be critical for native species that have limited unburnt refuges. They will provide connectivity for species to disperse through the landscape as habitats slowly recover. This is especially important for many small flightless species that can find even vehicle tracks impassable barriers to dispersal.
- Wetlands of National significance in Cape Gantheaume and Cape Bouguer WPAs and Flinders Chase NP, the latter of which contains the only catchment in SA that is entirely within the protected area estate, have not been mentioned. Cape Gantheaume CP, Grassdale lagoon, Lake Ada and Flinders Chase River systems are also Nationally Significant Wetlands but are not mentioned.
- Kangaroo Island is home to over 25% of South Australia's endangered coastal raptors, with approximately half of their breeding territories situated in protected areas.
- Kangaroo Island is a source population of the Nationally vulnerable Hooded Plover, with 200 adults on the island but limited breeding success due to their beach-nesting season aligning with the spring and summer peak visitation. The increased storm surge events exacerbated by climate change have a cumulative negative impact on nesting success. Beaches in parks must have protection measure in place to support breeding success.
- Cape Torrens and Cape Gantheaume WPA and Vivonne Bay CP have seasonal closures gazetted to protect coastal raptors.
- Western KI is habitat to numerous rare, endemic and undescribed invertebrates, a range of which are likely to soon be listed under legislation and/or were targets for post-fire government funding due to their threatened status. The current document cannot address this and appears to work directly against it by facilitating entry of commercial honeybees and their diseases into protected areas.

- There are several species of extremely rare and threatened land snails endemic to coastal limestone within the western Kangaroo Island park estate. Their entire known habitat was burnt in the 2019-2020 bushfires. They are also threatened by the invasion of exotic European land snails.

### **Comments about individual parks (pages 8 & 9)**

This section of the document is a woefully inadequate description of the biological, geological, historical, archaeological, palaeontological and aesthetic treasures contained in these 15 protected areas, given the vast sources of information available, but not referenced in any way in this document. Brief examples of this missing information include the following:

*Beyeria Conservation Park*: should list the spider orchid.

*Cape Bouguer WPA*: contains threatened plants including *Stylidium tepperanum* (rare in SA).

*Cape Gantheaume CP*: one of the boat ramps is not in the park.

*Cape Torrens WPA*: Coastal raptor territories are present in all but one of the coastal parks in this plan. Why mention Cape Torrens WPA specifically? It would be better not to identify nesting refuges and instead include a general reference on the previous page.

*Flinders Chase National Park*: Flinders Chase National Park is important on a state, national and international scale, having been protected for over 100 years and because of its location on an island with few weeds or vertebrate pests (State of the Environment Report, 2018), most importantly an absence of foxes and rabbits.

In the list of its significant species invertebrates and fungi are omitted. FCNP is a recognised 'hot spot' for fungi and contains numerous threatened invertebrate

species. Over 800 species of fungi have been identified in the parks of the western end of KI, two of which are listed under the International Union for the Conservation of Nature (IUCN) Red List as Endangered and Vulnerable.

*Kelly Hill Conservation Park: Styliidium beagleholii* (rare in SA) grows in the open, low-lying grasslands that are regenerating at the park entrance, west of the carpark. This area has been identified for future development of visitor infrastructure.

*Vivonne Bay CP:* Saying there is limited human disturbance in this park is questionable given that a quad bikes tour operator has permission to access the park on the Cape Kersaint track to the beach where threatened bird species breed. This text should be changed to emphasise ‘no visitor facilities’ and ‘no public vehicle access’, given the track traverses through private property to the north of the park and closed fire tracks on the boundary.

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

Dot Point 7: ‘*Maintaining wilderness quality and the priority conservation values and species of the parks*’ should be the first dot point listed, recognising that this is the critical function of all the parks, as stated in the first paragraph under the heading ‘Developing this draft plan’: “This plan provides strategic direction for the protection of the natural and wilderness values of the parks and wilderness protection areas.”

**Question 17: Why is ‘*Maintaining wilderness quality and the priority conservation values and species of the parks*’ not considered the highest priority challenge and opportunity?**

Dot Point 2: ‘*Managing the risk of bushfires to the community*’ should be included in Dot Point 9 and reworded to ‘managing the risk of bushfires and extreme weather events to the community and biodiversity’.

**Question 18: Why is there no mention of gaining a better understanding of fire through the application of the best available science to maintain biodiversity?**

Surely this is one of the primary challenges in the protection and management of these parks.

Dot Point 5: How do 'Providing outstanding park experiences and facilities' .... 'protect the parks' natural and heritage values'? We suggest words be changed to 'Providing outstanding park experiences and facilities to meet visitor needs without compromising the primary purpose of the park estate which is for the protection of its natural and heritage values'. This is more in line with the strategic direction (as above).

**Question 19: How do you intend to differentiate between visitor 'needs' and the 'wants' of some private businesses to provide exclusive access and facilities on undisturbed sites for paying clients?**

Dot Point 8:

**Question 20: How will commercial tourism businesses developing new nature-based tourism ventures 'enhance and support' the natural characteristics of the parks?**

Rather the wording should be 'Providing scope for commercial tourism businesses to develop new nature-based tourism ventures without additional infrastructure while protecting the natural characteristics and ecological values of the parks.'

The following dot points need to be added to the list:

- Maintain the integrity of the many habitats, vegetative age classes and functioning ecosystems required for biodiversity conservation.
- Commit to ongoing monitoring of threatened or near-threatened species to determine the long-term population trends, particularly in the wake of the Black Summer fires. Many species, including endemics, have very little data

available on distribution or numbers on KI prior to Black Summer due to the focus on visitor management and economic drivers.

- Commit to ongoing funding for the management of the park estate for conservation outcomes.

## **Management Priorities**

We support these five priorities but suggest changing Theme 4 to Fire Control and Theme 5 to include the conservation of Geological Monuments.

### **Theme 1 Conserving wildlife and ecosystems (pages 11 & 12)**

The title and first paragraph of this section are not reflected in the following text, where the emphasis is on a few individual wildlife species rather than an ecosystem approach. Western KI Parks region is a recognised biodiversity hot spot (Guerin, Biffin, Baruch, Lowe 2016 *Identifying Centres of Plant Biodiversity in South Australia*) and also listed by Wildlife Land Trust and Humane Society International as an area with a high level of endemism.

**Question 21: While different habitats are mentioned in this section where is the commitment within the draft management plan that such habitats will be protected in their entirety?**

The fifth and sixth paragraphs refer to the Glossy Black-Cockatoo and coastal raptors. There are 17 endemic subspecies of birds on KI, and the Glossy Black-Cockatoo is but one of them. Some of these lost more than half of their known habitat in the recent bushfires and have been identified as species of concern. Threat assessments that have been made on the KI Western Whip-bird, KI Southern Emu-wren, KI Shy Heathwren, KI Little Wattlebird, KI Purple-gaped Honey Eater, KI Brown-headed Honeyeater, KI Crimson Rosella, KI Striated Thornbill and the Western Beautiful Firetail (a species for which KI was a stronghold) for conservation status up-listing consideration under the EPBC Act.

Beach-nesting birds are facing increased disturbance on beaches around the island, including those located at Hanson Bay in the Cape Bouguer WPA. There is a

lack of management of dogs and vehicles on this beach, particularly since the KI Council changed the by-laws for boat launching. Development of visitor facilities must not impact on their breeding refuges.

Migratory shorebirds require protection as they fatten up over summer to return to their international breeding areas. Development of visitor facilities must not impact on their feeding areas.

**Question 22: Why are birds given such a cursory treatment?**

The first paragraph on page 12 relating to control of pest plants, pest animals and phytophthora should also include pest invertebrates (including especially feral honeybee colonies which take over crucial nesting hollows needed by native birds and mammals, plunder scarce nectar resources and pose a threat to visitor safety).

A number of exotic weedy plant species will need ongoing removal following fire. Tasmanian blue-gum wildlings are the biggest current plant threat to biodiversity, but pines and Cape Leeuwin wattles are also among a number of exotic plants already encroaching onto the park estate in many places.

**Question 23: What are the plans for managing pest plants on the park estate?**

**Question 24: What resources will be made available to accomplish pest plant control, especially for Tasmanian blue-gums which are advancing on a broad front?**

There is no mention of exotic pest bird species such as blackbirds, starlings and sparrows that are starting to encroach into our protected areas.

Proposals to push vehicle tracks into remote areas will only exacerbate the threats posed by exotic pests.

In the third paragraph on page 12 it states that “Total grazing pressure should be monitored ... by native and introduced fauna. Control of introduced herbivores is a priority.” Why has the grazing pressure on native flowering plants by feral bees been omitted? It says “should be monitored” but does this mean that it will be?

**Question 25: What resources will be made available to monitor grazing pressure within these parks, including of floral resources by introduced European honeybees?**

Research into the impacts of climate change on wildlife and ecosystems should be given far greater emphasis, especially as island species and ecosystems have such limited capacity to migrate as climatic conditions change.

**Question 26: How will the impacts of climate change on ecosystems and individual species such as beach-nesting birds, pests, visitors etc. be monitored?**

Research into the impacts of prescribed burns and wildfires, especially on biodiversity but also on property should also be a high priority, with climate change likely to both increase the length and severity of fire seasons and limit the occasions suitable for prescribed burning.

**Question 27: Will burning regimes be informed by the best available scientific evidence, or will it be dictated by the opinions of local landholders?**

**Question 28: What is a discussion of allowing commercial apiarists to have access to national parks for their exotic European honeybees doing in a section titled ‘Conserving Wildlife and Ecosystems’?**

**Question 29: What is a discussion of allowing commercial apiarists to have access to national parks for their exotic European honeybees doing at all in any plan of management for any National Park, Conservation Reserve or WPA where conservation of wildlife and ecosystems is a primary goal?**

Apiary licences should not be granted anywhere in the conservation estate. European honeybees are not native insects and should not be encouraged to harvest nectar and pollen in native vegetation in parks in direct competition with native wildlife. European honeybees have many detrimental impacts in national parks including:

- They already are estimated to remove 80% of all native floral resources in South Australia (source Associate Professor David Paton)
- Kangaroo Island has approximately 100 species of native bee, plus many other insects, birds and mammals that depend upon native floral resources. Stealing hundreds or thousands of kilograms of nectar and pollen from native ecosystems has serious but unpredictable consequences up and down the food chain for the myriads of native creatures that need that resource to survive, especially at times of seasonal shortage, drought or following bushfires, which is when apiarists are more likely to want to exploit native floral resources in national parks
- Many native flowers depend upon specially-adapted native pollinators to maximise reproductive success – honeybees are inefficient pollinators of many native species. Over time the presence of European honeybees will skew the native vegetation composition towards those species most efficiently pollinated by them, such as the Myrtaceae, and plants requiring specialised native pollinators will become scarce
- Many environmental weeds on Kangaroo Island have co-evolved with European honeybees. In the absence of European honeybees their seed production and hence their invasiveness would be negligible in many cases. In the presence of honeybees they constitute major environmental threats to the conservation estate
- Honeybees live in large colonies that generate heat and are larger-bodied than most native bees, enabling them to become active earlier in the morning or in colder weather than most native pollinators, plundering the vast bulk of the available resources while native species are inactive
- Honeybees are more aggressive than most native pollinators and ‘bully’ them away from flowers

- Managed European honeybees frequently go feral and take up residence in scarce tree hollows in direct competition with native birds and mammals, especially critical on Kangaroo Island for the nesting success of the glossy black-cockatoo
- Honeybees are Australia's deadliest creature, killing on average more people annually than sharks, crocodiles, snakes or spiders. Around 3% of people suffer anaphylactic shock when stung by a honeybee. European honeybees are attracted to water sources such as water tanks, taps, toilets and hand basins in hot dry weather, which puts them in direct dangerous contact with people in our parks.

Exotic European honeybees should not be allowed in parks, particularly given the depletion of nectar resources following the Black Summer fires. In fact, given their ability to forage over many kilometres from their hives, a European honey bee-free buffer zone should be established around each of these 15 parks of at least 5km.

Aggressive honeybees are known to outcompete native bees, insects, birds and small mammals for these resources which are very limited due to the extent and intensity of the fires and will remain so for many years. **This does not meet the objective of Manage natural areas to conserve wildlife, recover priority species and maintain ecosystem health.**

Rather than expediting commercial apiarists to plunder critical native floral resources in our national parks, the Department should be putting far greater resources into removing the already ubiquitous feral colonies from our parks. If apiarists are lacking native floral resources for their commercial needs, there are many thousands of hectares of degraded cleared land that could be easily and cheaply planted out with native flowering plants.

**Question 30: What efforts will be made to remove existing feral European honeybee hives from these parks?**

**Question 31: Regarding the Long-nosed fur seal, what has ‘providing a world class opportunity for visitors to observe animals up close’ to do with the theme of ‘Conserving Wildlife and Eco-systems’?**

It would be more suitably placed under Theme 3 ‘Creating exceptional visitor experiences’.

***Additional information to be included in Theme 1.***

Kangaroo Island has at least seven species of insectivorous bats and possibly more. Their genetic and conservation status is largely unknown. The western end of KI is a known biodiversity hot-spot for fungi. They are important post fire colonisers, decomposers and an essential part of all ecosystems. A number of species of land snail are extremely rare and only found associated with limestone on the western coastline of Kangaroo Island where their entire known habitat has been burnt. They are also threatened by invasive European snails.

The lack of any consideration for such important components of the park ecosystems, plus the cursory treatment of invertebrates (probably comprising at least 95% of the total biodiversity) and birds highlights the lack of scientific input into the planning process.

The KI Landscape Board hosts a searchable database of nearly everything ever written about Kangaroo Island and its flora and fauna, comprising over 6,500 individual items.

**Question 32: Was the KI Landscape Board searchable database of biological resources of Kangaroo Island consulted in preparing this plan, and if not, why not?**

Exclusion zones must be created around sites where threatened species are observed or recorded. A comprehensive monitoring program must be implemented for at least 12 months prior to any development work in any part of

the park estate commencing. Such development should only replace infrastructure that burnt.

There need to be far more detailed plans about protection of native vegetation.

### ***Objectives and Strategies (page 13)***

Under dot point 4, why aren't feral bees included along with feral cats and feral pigs for monitoring, controlling and eradicating?

**Question 33: What is the evidence that feral pigs have a greater environmental impact upon native wildlife and ecosystems than feral bees?**

**Question 34: If there is no such evidence, why are so much effort and resources being put into feral pig eradication while feral and managed European honeybees are being at best ignored and at worst actively encouraged?**

### **Theme 2 Maintaining wilderness quality (page 14)**

Park SA definition of wilderness: *'South Australia's wilderness areas are life-giving places of natural and cultural significance. Our wilderness areas are a crucial part of natural resource management in our State. They protect biodiversity, assist with landscape-scale natural resource management, and provide valuable ecological, evolutionary and climatic reference and research areas for the future. They offer insight into Australia's pre-European condition, hold significant cultural connections for Aboriginal people, and provide opportunities for future generations to experience and enjoy untouched natural landscapes. The Wilderness Protection Act 1992 defines wilderness criteria for South Australia. For land to be considered 'wilderness,' it must be relatively free from the effects of modern technology and not seriously affected by exotic animals, plants or organisms.'*

**Question 35: With the above definition why does the theme 'Maintaining wilderness quality' only relate to the Wilderness Protection Areas (WPA)?**

Shouldn't the aim be to maintain wilderness quality in all parks regardless of their legislative status? Wilderness quality is present and should be maintained in National Parks and Conservation Reserves as well as WPAs. Either wilderness zones should be identified within parks or wilderness should be the default state except where zoned otherwise (such as in already developed areas).

**Question 36: Why are there no 'Wilderness Zones' identified and delineated within these parks apart from formal WPAs?**

**Question 37: Why is 'Wilderness Zone' not the default state of all areas of this park estate except for those small discrete areas explicitly zoned otherwise?**

The Department should lead by example — a coalition of 70 countries (the High Ambition Coalition) has championed a global push to halt and reverse biodiversity loss by 2030, including a target of conserving or protecting at least 30 per cent of global land and oceans, by 2030. Australia has committed to this global target but not pledged action. This management plan should make a start.

**Question 38: How can appropriate management of visitors, tour operators, and infrastructure '*protect and improve* long term integrity of wilderness quality'?**

Should it not be 'This involves appropriate management of visitors, tour operators, and infrastructure so that they do not in any way *damage* long term integrity of wilderness quality'?

The proposals to continue to regularly burn the WPAs without reference to the best available scientific knowledge will not maintain wilderness quality and will lead to the creation of a 'managed landscape'. The proposal to cut the RDC WPA up into blocks will destroy wilderness and facilitate entry of pest organisms.

**Question 39: How will the proposal for regular burning and the creation and maintenance of bulldozed tracks through the Ravine des Casoars WPA maintain wilderness quality?**

**The following is an extract from the Wilderness Protection Act 1992 Wilderness Code of Management:**

*3.10 Emergency and essential management operations*

*(i) All emergency and essential management operations will be carried out with the least possible impact on wilderness quality.*

*(ii) Actions that cause short-term degradation of wilderness quality but are necessary for emergency and/or essential management operations will be permitted. The only specific situations acknowledged in this Code as possibly requiring such actions are:*

- control or eradication of non-indigenous species;*
- conservation of threatened species, communities and habitats;*
- protection of fire-sensitive species and communities;*
- management of visitor use;*
- management action or use of devices to mitigate hazard to human life;*
- restoration of natural processes, communities and habitats; and*
- research.*

*Where degradation has occurred as a result of these activities, rehabilitation will be undertaken as soon as practicable.*

**Question 40: How is the proposal for regular burning and the creation and maintenance of bulldozed tracks through the Ravine des Casoars WPA consistent with the Wilderness Protection Act 1992 Wilderness Code of Management?**

***Objectives and Strategies (page 14)***

The introductory paragraph refers to 'Low impact use and enjoyment' – some areas need to be set aside without promotion of visitor use and the need to allow public access to all areas at all times. This is especially the case for protecting

threatened species habitat and breeding refuges, and to minimise the incursion of weeds and phytophthora into remote areas.

Dot point 4 needs strengthening to 'Maintain existing public infrastructure necessary for essential management, ensuring that the wilderness values of the protected areas are not in any way damaged.'

All infrastructure within the park estate needs to remain in public ownership.

### ***Wilderness Protection Areas Visitor Management Strategy (page 15)***

**Question 41: If public use and enjoyment is compatible with maximising wilderness quality, why do we gazette closures in two WPA's?**

There is currently no vehicle access to Cape Bouguer WPA so vehicle access on 'existing public access roads' doesn't apply.

Commercial 4WD tour operators in the Ravine des Casoars WPA need to be limited to Shackle Road and Ravine des Casoars roads.

#### ***Additional points:***

There is a need for Gazetted closures to mitigate impacts on threatened beach nesting bird breeding refuges.

### **Theme 3: Creating exceptional visitor experiences (page 16)**

**Question 42: Are the experiences that are described in paragraph 2 the visitor experiences that park management seeks to maintain ie: ‘experiences that are relatively “untouched by humans”’?**

**Question 43: How can increasing visitor numbers be sustainable if wilderness values are to be preserved?**

The fourth paragraph refers to ‘the changing composition of visitors.’

**Question 44: How is the composition of visitors changing and what are the emerging issues relating to those changes?**

**Question 45: How will park management ‘future proof’ against changes in the composition of visitors?**

**Question 46: Where is the plan for visitor management?**

There is mention of a Kelly Hill Cave expansion. Apart from the chocolate wattled bat it is not known what bats are roosting there, however all bat species known from KI have been recorded at Kelly Hill and all roosting bats are very susceptible to disturbance. Any further cave development will have an impact on bats and other specialised cave fauna, which by definition is rare and localised.

While caves are an attractive feature for visitors, it must not be forgotten that conservation of all biodiversity is the primary function of these parks. As such, no new caves should be opened up to visitors.

**Question 47: How will any expansion of Kelly Hill Caves be managed to prevent negative impacts on native bats and other cave fauna?**

There is mention of visitor facilities providing ‘an immersive viewing and learning experience’ at Seal Bay. This is a poor choice of words because 1) it is meaningless waffly jargon, 2) it is dangerously vague in a management plan that makes no

stipulations about the types and locations of development allowed, and 3) it could be read to imply swimming with the sea-lions (as is done elsewhere in South Australia), and totally inappropriate for a conservation/marine park area.

There is mention of the types of accommodation anticipated in designated Visitor Use Zones, which raises the following issues:

- RV sites: recreational vehicles come in a range of types and sizes – this description needs some qualification. Are all RVs to be permitted in Visitor Use Zones or are there to be limits on sizes? Considering the additional space and vegetation clearance that they require, in which camp sites will they be permitted? Such sites should be identified clearly in the Visitor Use Zones. Are such sites going to provide power and sullage or *dump* sites? Why shouldn't larger RVs and those requiring power and sullage be catered for in nearby commercial or council parks?
- 'Pods': this term is too vague, inviting too many interpretations as to what it means regarding size, construction and permanence. The largest of the structures proposed by the Australian Walking Company, referred to in all of their propaganda as 'pods', could not be described as anything other than large, substantial, permanent buildings.
- Privately operated accommodation: no further private commercial accommodation should be constructed, nor public accommodation leased to private businesses in our public parks. Such accommodation should be located on private land outside of the parks.
- Accommodation fees for cabins, cottages, tents and campsites should be affordable and within the budget of 'average' visitors. 'High end/exclusive' accommodation does not belong in the public parks – it can be provided elsewhere.
- The maps showing the Visitor Use Zone locations provided in the Appendices are totally inadequate and lack important information. More comments highlighting this is provided in the relevant section below.

'Additional viewing platforms' need to be identified on the maps and located in Visitor Use Zones and must include provision for safe pull-off areas if located on

roadsides. Such viewing platforms should be carefully constructed so as not to detract from the wilderness values of an area. Visitor use zones are not clearly identified on the maps, leading to uncertainty about their size.

‘Walking and cycling trails strategy’ – more details need to be provided regarding this strategy and the way relevant aspects of it relate to proposed developments in the parks of western and central Kangaroo Island. Alignment of the Kangaroo Island Wilderness Trail (and other suggested trails) must be in keeping with this document’s strategic direction (*paragraph 1 page 2*) ‘the protection of the natural and wilderness values of the parks and wilderness protection areas.’

**Question 48: Does a ‘walking and cycling trails strategy’ actually exist, and if so, why is it not listed in the ‘References’ on page 41?**

Walking and cycling tracks are notorious for allowing invasion of pests into remote areas. Exotic weed species were being found along the Kangaroo Island Wilderness Trail within a year of its opening, and the provision of boot brushes is hardly an effective measure for preventing introduction of phytophthora.

**Question 49: How will walking and cycling tracks be managed to prevent them becoming pathways for introduction of pests?**

There is discussion of visitor facilities designed to “maximise sustainability” and “minimise impact”. These terms are meaningless waffly jargon unless rigorously defined and able to be measured and monitored, and ineffective unless fully implemented regardless of cost.

**Question 50: How will the terms “maximise sustainability” and “minimise impact” be defined in practice?**

Bridal creeper is one of the worst environmental weeds in southern Australia due to its ability to establish in and smother undisturbed ecosystems and to be spread by birds. Bridal creeper was almost unknown from the western half of Kangaroo

Island before DEW (or its predecessors) carried out construction works without regard to the source or hygiene of the materials used. Over recent years Friends of Parks KI Western Districts members have discovered bridal creeper growing around the edges of the Rocky River Visitor Centre, Ranger housing, Kelly Hill picnic shelter and toilets, walking tracks at Admirals Arch, Cape Borda, Kelly Hill and Rocky River, a pile of fill at Cape Borda and other places always near to recent construction activity.

**Question 51: What protocols will be established, monitored and enforced to avoid introducing exotic pests such as bridal creeper or phytophthora during construction of visitor and staff facilities?**

All 'Operational infrastructure' must be publicly owned.

**Table 1 (page 17)**

Fire Pits are not supported due to:

- fire risk from campfires left unattended
- concerns about the sourcing of firewood from native vegetation
- denuding areas of the dead wood that provides essential habitat for native insects, animals and fungi
- firewood brought in from outside the parks containing phytophthora, invertebrate pests or weed seeds
- encouraging campfires in other non-designated locations.

***Objectives and strategies — Develop park facilities to create exceptional visitor experiences (page 18)***

Dot point 2: Cape Borda Heritage Accommodation— this must remain in public hands and not be handed to private operators to run at a profit. Accommodation fees must remain at 'average, affordable' rates for normal families and not be targeted at the high-end/exclusive minority. This comment also applies to Dot

Point 4 (May's Homestead and Postman's Cottage) and Dot Point 6 (Edwards Cottage).

Dot Point 3: RV sites - see comments above.

Dot Point 4: Comments on Dot Point 2 above apply.

Dot Point 6: Plans for Kelly Hill Conservation Park are supported with the caveat above (Dot Point 2).

Dot Point 7: Neither Snake Lagoon campsite nor Harvey's Return campsites are identified on the appropriate maps (Fig 11 and Fig 14)

Dot Point 10: If other multi-day walking trails are planned with associated constructed campsites and infrastructure then they should be identified in this document and be subject to wide and comprehensive public consultation. Having them slipped into the document in this manner gives too wide a scope for creating campsites and other facilities in inappropriate locations such as areas with high wilderness values. This document as it stands provides no guidance on where might or might not be appropriate for such developments.

**Question 52: Are other multi-day walks planned, and if so, where?**

There is no map that shows the location of the complete Kangaroo Island Wilderness Trail.

Dot Point 12: The private luxury accommodation on the Kangaroo Island Wilderness Trail is defined in explicit detail unlike the broad stroke design of everything else in the draft management plan. Why is this particular development spelled out in such detail?

Other concerns here include:

- Kangaroo Island Wilderness Trail public camp site locations are not included in Figures 5, 10 or 11. The maps do not provide adequate identification of either the public camp sites or the private accommodation sites. More clarity around the location of both public and private campsites is needed.
- The differentiation between eight accommodation pods (including guides accommodation) at Maupertuis Bay and seven accommodation pods and one guide accommodation pod at Rocky River is confusing – are they different numbers of buildings? As identified before the term ‘pods’ is a deliberately inadequate explanation of the scale and permanence of the buildings proposed.
- Why aren’t the location of the proposed lookouts at the three locations identified on the maps?
- What new roads are anticipated at Sanderson Bay, Rocky River and Cape De Couedic? These are not identified on the maps, only tracks.
- Information was circulated to Friends of Parks and Eco-Action by DEW and AWC that the coastal trail leading south-east from the Visitor Use zone on Figure 10 was no longer going to be built, as part of the agreement reached when the court case was abandoned. Why has this now changed? If this length of track is constructed it will add to further habitat fragmentation in an area with high wilderness values and breach the agreement reached between the parties in good faith.

Dot Point 13: Visitor infrastructure supporting interpretation at the Ravine des Casoars Wilderness Protection Area omits the Lighthouse Keepers’ graveyard and the Return Road Hike, the latter established and maintained by the Friends of Parks KI Western Districts. Are these important historical sites to be left out?

Dot Point 15: How is extracting water from dams in Latham Conservation Park creating exceptional visitor experiences in the parks? In what way is it an objective or a strategy? Without any background information it is hard to see how it fits in here.

***Objective and strategies – Ensure park facilities and infrastructure are sustainably designed, constructed and operated minimising impacts on the natural environment (page 19)***

As discussed above, talk of sustainability and minimising impacts is meaningless unless they are rigorously defined, there are means in place to measure and monitor them, and they are fully implemented regardless of cost.

Dot Point 1: Visitor facilities must be publicly owned and managed, located on areas of existing anthropogenic disturbance and are not to be placed in areas of significant wilderness and natural beauty.

Dot Point 4: Walking and cycling trail strategy – Pg 16 Para 11 refers to this strategy. Is it in existence or is it still to be developed? If it exists why is it not included in the 'References'? Trails should only be developed on existing cleared land and not in areas with high quality conservation or wilderness values.

***Additional strategies***

There must be provision of appropriate hygiene stations to minimise the spread of *Phytophthora cinnamomi*, an EPBC Act threatening process.

**Theme 4: Managing fire (page 20)**

All fire management, including prescription burning, should be based on scientific evidence, not on opinions no matter how sincerely held.

The establishment of five new permanent fire access tracks in Ravine des Casoars Wilderness Protection Area is strongly opposed because this will not achieve the objective of stopping or being able to manage wildfire (note the 2019/20 fires). These proposed tracks will destroy wilderness quality, disrupt ecosystem processes, create a managed landscape, provide pathways for incursions of phytophthora, feral pests and weeds, encourage illegal vehicle access and become a fire trap for firefighters.

Why do we need multiple fire tracks parallel to each other? The area has steep terrain and this, along with the perched swamps, makes track maintenance almost impossible. Creation and maintenance of these tracks will provide no benefit and only serve to fragment wilderness. This does not align with the Wilderness objectives!

The 2009 Flinders Chase Fire Management Plan set the lower Threshold of Potential Concern for fire frequency for Eucalyptus woodland with scrubby understorey at 17 years and the upper threshold at 40 years. There should be great concern for the future of these ecosystems if shorter gaps between fires becomes the norm.

### ***Comments on Indigenous fire management***

The proposed adoption of cultural burning practice is irrelevant because there has been no Aboriginal fire on Kangaroo Island for 2,300 to 4,000 years BP. The KI ecosystems have evolved in the absence of Aboriginal fire and have been subjected to relatively regular large hot fires instead. Information from elders over the past 35 years indicates that the Aboriginal connection to KI is mythological and not physical. In fact physical engagement with KI is discouraged by the elders of N Garrindjeri, Ramindjeri, Kurna and Narungga.

### ***Objective and strategies (page 21)***

Dot Point 1: Include Environment Non-Government Organisations (eNGOs) as partners.

Dot Point 5: The establishment of five new permanent fire access tracks in Ravine des Casoars Wilderness Protection Area is strongly opposed. Establishing water tanks is supported but not if it encourages the creation of more tracks.

### ***Additional dot points:***

- Employ sufficient fire management staff and provide sufficient funding to enable good science-based fire management practices.

- Ensure timely access to aerial water bombers.
- Incorporate habitat requirements and age class structures for biodiversity in fire management activities.

More Adelaide-based air tankers are urgently required. The ‘Lessons from the Island report’ states that ‘The initial attack using all available aircraft in the period 20-22 December cannot be overstated in relation to the success of the outcomes of the Duncan and Menzies fires on KI, and the Cudlee Creek fire on the mainland’.

While air tankers are expensive to purchase and maintain, this cost is still much lower than the cost of loss to life and property caused by increasingly prevalent mega-fires.

### **Theme 5: Conserving cave and karst features and palaeontological sites (page 22)**

While human impact on speleofauna is mentioned there is insufficient information given about the fauna involved and measures to be taken to protect them. Most caves need to be left as undisturbed areas.

**Question 53: What efforts will be made to identify and understand the ecological requirements of speleofauna?**

**Question 54: What specific actions will be taken to avoid negative human impacts on speleofauna?**

### **Objective and strategies (page 23)**

*Additional dot points:*

- Leave all but one cave undisturbed to limit negative impacts on speleofauna.
- Monitor speleofauna populations.
- Geological monuments— include strategies for conservation of Admirals Arch and Remarkable Rocks.

## **Theme 6: Celebrating cultural heritage and history (page 24)**

The aim to give more prominence to celebrating cultural heritage and history is supported. This is an area that has received little attention in recent years. However linking European built heritage (eg lighthouses etc.) with First Nations is disrespectful. Europeans have not lived on KI for thousands of years. Either it needs to be reworded into two different points or comments should be relocated to paragraph 6.

Paragraph 4: Matthew Flinders' ship traversed, not circumnavigated, the southern Australian coastline.

Paragraph 6: Where is the mention of the Aboriginal women brought to the island?

Paragraph 7: There is no mention of the Return Road Hike, which recreates the road taken by lighthouse keepers, or the lighthouse keepers' cemetery. Suitable interpretative signage needs to be installed.

There is no mention of the museum at Cape Borda Lighthouse precinct and its maritime artifacts. This museum should be upgraded, and the maritime history presented in a more engaging way for visitors, thus highlighting Kangaroo Island's maritime history. This will also help to create an 'exceptional visitor experience'.

## ***Objective and strategies: work in partnership with First Nations groups to manage the parks and wilderness protection areas (page 24)***

As mentioned above, this may be inappropriate due to the Aboriginal connection to KI being mythological and not physical. In fact physical engagement with KI is discouraged by the elders on N Garrindjeri, Ramindjeri, Kurna and Narungga.

***Objective and strategies: Tell the stories of the parks to help visitors develop greater appreciation, understanding and respect for the deep relationship between First Nations people and Kangaroo Island (page 25)***

As mentioned above, this may be inappropriate due to the Aboriginal connection to KI being mythological and not physical. In fact physical engagement with KI is discouraged by the elders on Nrarrindjeri, Ramindjeri, Kurna and Narungga.

***Objectives and strategies: Conserve and celebrate the parks' rich cultural heritage and history (page 25)***

Dot Point 2: Locations of historical importance are not limited to Flinders Chase National Park but include Cape Borda, Ravine des Casoars WPA, Kelly Hill Caves Conservation Park, Cape Gantheaume Conservation Park etc.

**Additional comments about the draft document:**

- There is minimal mention of climate change and nothing at all about the projected impacts of climate change, which must surely be a primary consideration when planning for managing protected areas into the future, especially so on an island with minimal opportunities for species and ecosystems to migrate to keep within their evolved climatic parameters.
- There is no information about proposed traffic management especially in places of high visitation like Remarkable Rocks, Seal Bay and Admiral's Arch.
- There is no mention of a code of conduct for recreational vehicles.
- There is no mention of compliance requirements and policing.
- There is no mention about the importance of the wetland areas.
- There is very little about biosecurity, which will become a more pressing issue if visitation increases, and especially if there is more infrastructure.
- Is there any intention to reinstate the Breakneck Creek walking track? This would be an opportunity to further disperse visitors without unduly compromising wilderness values.
- There is no mention about the review that was to be held and its findings into the previous *Flinders Chase National Park, Kelly Hill Conservation Park, Ravine*

*des Casoars Wilderness Protection Area and Cape Bouguer Wilderness Protection Area Management Plans (1999) and Plan Amendments (2017) and those of the other parks listed on page 2.*

- Where are the assessment and review strategies for the proposed new management plan? What is the timeline for the review of the strategies of the new plan and who will be involved in such a review?
- Standardise and use 'visitor' rather than 'tourist' – parks are important for locals as well as off-island tourists.
- Remove 'immersive' as an adjective – its use is meaningless jargon.

## **Appendices – specific comments on maps**

**Pg 28 Figure 2 Seal Bay:** Why is Bales Bay not included on the map given it has a road to the beach, carpark and access to the Cape Gantheaume WPA?

**Pg 29 Figure 3 Cape Borda:** There is no indication on the map of Return Road Hike nor the Cliff Top Hike. Are they not going to be reinstated?

**Pgs 30-33 Figures 4 -7:** Why is the only walking trail shown on these maps the KI Wilderness Trail?

**Pg 30 Figure 4 Rocky River:** Many walking trails are omitted including the Heritage walk, Platypus Waterholes Walk, Black Swamp Hike etc. Are they not going to be reinstated? The buildings: are they ruins of existing or are they proposed new buildings? Two of the buildings appear to be outside of the Visitor Use Zone. There is inconsistent labelling: if visitor zones are to be reinstated, put the name of the campground or facility on the map with a note 'may be reinstated'.

**Pg 31 Figure 5 Cape du Couedic:** The public campsite for the Wilderness Trail is not included, nor lookouts both existing and proposed. Why are walking tracks including Weirs Cove Hike and Cape du Couedic Hike omitted? Why are Weirs Cove and Boxer Drive not included on maps (including day visitor area, lookout and the KIWT spur trail and link to Remarkable Rocks)? Why are the Casuarinas Islets not included as Prohibited Areas as in the Seal Bay and Remarkable Rocks maps?

**Pg 32 Figure 6 Remarkable Rocks:** Again there is inconsistent labelling. If visitor zones are yet to be reinstated, put the name of the boardwalk, toilet, etc on the map with a note. Yacca flat is a firetrack, not an unsealed road - remove from maps.

**Pg 33 Figure 7 Kelly Hill Caves:** Mays Hike, Burgess Hike, Hanson Bay Hike, Old Cave Entrance, day visitor facilities are not identified. Remove unsealed road to the west as it is not accessible.

**Pg 34 Figure 8 West Bay:** Paisley Islet needs to be included as a Prohibited Area.

**Pg 35 Figure 9 Murray Lagoon:** Why are other trails included here?

**Pg 36 Figure 10 Sanderson Bay:** This map lacks clarification regarding public camping and private accommodation village locations. The track linking the Visitor Use zone and Sanderson Track must be removed. The location of the Visitor Use zone on a relictual dune is not sustainable and needs to be relocated further from the coast.

**Pg 37 Figure 11 Rocky River (Maupertuis Bay):** Public campsites both for general camping (Snake Lagoon) and for the KI Wilderness Trail are missing. Is the general public campsite going to be removed? The Sandy Creek and Rocky River Hikes are omitted. Is the Rocky River Day visitor area no longer a visitor use zone?

**Pg 38 Figure 12 Allotment 5 and Southwest Parks:** Accommodation at Rocky River (Maupertuis Bay) and Sanderson Bay are indicated but not the campsite at Grassdale, nor is there any indication of the sites for staff housing, works depot, and other operational infrastructure in Allotment 5.

**Pg 39 Figure 13 Kangaroo Island Parks 2019-20 Bushfire extent:** The intensity of the fire is as important as the extent in a management plan, as is the fire history, as they both have enormous bearing on the ability of ecosystems to fully recover.

**Pg 40 Figure 14 Ravine des Casoars WPA proposed fire access tracks:** Without detailed aerial imagery, this is deceiving. As discussed above, these tracks must be removed from consideration.

### **General Comments on maps**

None of these maps identify the locations of areas of high ecological value, eg locations of threatened plant, animal, fungal species, wetland areas etc, that would determine their unsuitability for any development including those

described as ‘low impact uses such as picnic areas, camping areas and walking and cycling trails, and ancillary facilities such as shelters, toilets and barbecues’ These ‘low impact uses’ can have extremely high impacts on such areas and should be recognised as such.

Apart from Figure 13 which shows the bushfire extent in the 2019–20 bushfires there are no maps that relate to any ecological aspects of the Western and Central KI Parks. These parks are very diverse and not ‘one-size-fits-all’.

Maps order is extremely confusing and should be by location – currently they are mixed up with Flinders Chase interspersed with Murrays Lagoon etc.

What is the distinction between a ‘track’ and a ‘trail’?

Harveys Return: why is there no map of this part of FCNP?

As mentioned above, a map showing the complete location of the Kangaroo Island Wilderness Trail needs to be included.

## **References (page 41)**

The references are minimal and totally inadequate for a plan that covers the size, diversity and significance of the 15 parks of Western and Central Kangaroo Island. In contrast the Cleland National Park draft management plan which is just one park has more than double the number of references. There is no reference to the previous plans, no referencing of the ‘ReImagine’ frameworks on which this plan is supposedly based, no mention of the exhaustive biological survey documents covering these parks, threatened species reports, biological databases, historical records, introduced species, palaeontology, archaeology etc. Nor are there references regarding climate change and its projected impacts on the park. Nor is there any reference to the Kangaroo Island Natural Resources Management plan.

How can a plan for a suite of national parks be produced without any foundation on what went before, without any knowledge or acknowledgement of the ecological treasures protected in the parks, and no thought for future challenges?

As a starting point for going back to the drawing board and trying to get this plan right, the Kangaroo Island Landscape Board maintains a searchable database of nearly everything ever written about Kangaroo Island, comprising over 6,500 individual items.