

Response to Parks Victoria: Review of Land Management Strategy



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Context:

Lorne is a town on the Great Ocean Road, surrounded by the Great Otway National Park.

The purpose of the Friends of Lorne (FoL) is:

- To encourage and contribute to the planning and development of the environment within Lorne and its environs consistent with the need for preservation of the natural features, flora and fauna of the district
- To encourage and contribute to the planning, development and maintenance of community services and activities within Lorne and its environs consistent with the balanced needs of permanent residents, holidaying residents, campers and tourists.

Through newsletters, visitor information (including translation into Mandarin), citizen science and public meetings including Webinars, FoL contributes to education about habitat and biodiversity

Comments on the Land Management Strategy

Protecting Victoria's natural riches (Theme 2)

Purpose and value of National Parks	The purpose of National Parks is principally to protect and conserve habitat and the diversity of living organisms for the nation. Friends of Lorne recognise habitat and biodiversity as having intrinsic value. We also recognise that parks, as areas of relatively undisturbed habitat, provide services that are of direct benefit to communities, and that their role in storing and sequestering carbon is of benefit globally
Relative importance of Park functions (Themes)	Conservation of biodiversity through protection of habitat is the most important function of National Parks. We suggest that this Theme should be elevated to the first position in the Strategy. All other considerations (Themes) should be subject to that protection being achieved.
Baseline data and monitoring	Baseline data is an essential part of conservation. We are disappointed that more emphasis is not given to monitoring of habitat and/or organisms and of how this work will be divided between State instrumentalities. We recognise that Victoria has been and is being changed by the activities of humans and that some of these changes are irreversible.

Adapting to climate change (Theme 3)

Offsets	The strategy makes mention of climate change, carbon storage, mitigation and adaptation. In the past Victorian government agencies, just like private owners, were required to establish like-for-like offsets for activities that damaged or removed natural habitat. It now seems that the provision of other community benefits, such as improved roads, is accepted as offsetting environmental damage and loss of stored carbon caused by government. We do not accept this approach.
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Mitigation We suggest that the gains and losses of habitat and stored carbon should be quantified, publicly available and that losses should be offset (like-for-like). Adaptation to climate change is at best a band aid solution if that adaptation does not address the root causes of climate change. Offsetting should be secondary to mitigation of climate change by emissions reduction and increasing carbon storage.

Managing country together (Theme 1)

Managing the landscape through partnerships (Theme 4)

Government agencies The management of wild life, biodiversity and habitat in Victoria is multi-layered to the point that it is difficult to understand where responsibility lies. The Strategy should include additional guidance for the public. Possibly it should include work to review the current division of labour between instrumentalities. Responsibilities in the Great Otway Park are particularly unclear at the moment because of the creation of the Great Ocean Road Coast and Parks Authority
We acknowledge that having access to the diverse skills of a range of agencies can be advantageous, but also that sub-optimal performance by a single agency can place entire programs at risk. We note that the Auditor General has just issued findings about the inadequacy of DELWP measures to protect biodiversity.¹ Similar findings have been made about Commonwealth instrumentalities and programs.

Park ownership While recognising that collaborations will involve non-government groups and individuals, and might involve permits or leases, FoL believes that ownership of Parks should remain with the public in perpetuity.

Structures within parks Built forms should be as needed for purposes of protection, conservation and education. Structures should not be features in themselves.

Cultural values In our opinion cultural values should be subservient to the primary objective to protect habitat.² Where there are conflicts between values, decisions should be based on objective evidence.

Volunteers or employees? Consultants We support the involvement of citizens and other agencies in the management of Parks. However, we believe it is critical that Parks Victoria is well staffed with people with expertise in all aspects of its functioning. We do not accept that volunteer programs or out-sourcing are adequate substitutes for in-house expertise.

Enriching the visitor experience (Theme 4)

Recognising connections to place (Theme 6)

Contributing to the visitor economy (Theme 7)

Education We support work to ‘enrich the visitor experience’ where this involves education and first-hand experience. Many encounters with natural systems in our region occur outside National Parks, so we see education as having broad benefits.

Non-English speakers In typically Australian fashion there has been little or no recognition of the needs of English-as-a-second-language tourists. Although pictograms depict all manner of dangers, written information is only in English.

Facilities at sites All visitors need to know what to expect at particular destinations. This includes

¹ <https://www.audit.vic.gov.au/report/protecting-victorias-biodiversity?section=> viewed 16/10/2021

² For example, maintaining populations of exotic game species for hunting reflects a cultural value, but that value should not be supported in Parks

within Parks	the level of facilities such as manned tourist information booths, food supplies and toilets. We are aware that there is a case to be made for not having toilets at particular destinations, but can see no case for not warning visitors about their absence. Despoilation in our region is evident at car parks at the Sheoak Falls and Erskine Falls.
Accommodation	Most parts of the Great Otway National Park are close to privately owned tourist businesses. We do not see a need for accommodation or other permanent installations to be constructed within the Park or for leases over parts of the Park to be granted for commercial activities. We support the provision of walk-in tent camping sites for bushwalkers traversing the park
Regulated access	We support controls on visitor useage being implemented as needed. We support the closure of the Great Otway Park in periods of extreme fire danger.
Equal access	We support in principle the idea that people of all levels of ability should be able experience some part of all Parks. We do not however support the wholesale upgrading of all routes to accommodate all levels of disability.
Risk	We support in principle the notion that not all risk can be or should be controlled within Parks because risk is inherent in natural environments. We note that Tasmania and New Zealand appear to manage risk quite differently to Victoria.