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## Submission to Parks Victoria on the River Red Gum Parks Management Plan (July 2017 DRAFT)

Thank you for the chance to reply to Parks Victoria's River Red Gum (RRG) draft 2017 management Plan. The Australian Brumby Alliance Inc. (ABA) is a national body for the Recognition, Management, Preservation and Welfare of Australian Wild Horses (Brumbies). The ABA's main interest is in giving feedback on Barmah National Park, which we note is excluded from this draft, as stated below;

- *"This draft plan does not encompass Barmah National Park ..... which will be covered in a Joint Management" [vi] and*
- *"Barmah National Park is not within the scope of this draft plan" [p6].*

While we wait for the Barmah National Park Red River Gum management plan to be released for public feedback, we provide the following brief comments on the July 2017 draft relating to;

- Australian Aboriginal and Post-Settlement Communities, and
- Damages caused by altered environmental water flow regimes.

### **Australian Aboriginal and Post-Settlement Communities**

The draft often refers to formal agreements between Parks Victoria and Aboriginal communities on the valued skills and culture they bring to park management decisions. For example, *"water must be supplied in adequate quantity and quality to improve Traditional Owners' spiritual, cultural, natural, environmental, social and economic conditions"* [p46]. The ABA would suggest these sensible targets would also apply to all Australian communities, including Post-Settlement cultural historic values.

The draft rarely speaks of involving 'post-colonial' communities in management decisions and there is no suggestion of formal agreements with post-settlement heritage connections, despite the plan's reference to respecting and enhancing understanding of Post-Colonial Settlement heritage values by *"improved information and interpretation"* and of *"strong connections" .....* *"through the history of settlement, grazing and timber cutting"*. The ABA is concerned that park management prioritise one culture over another in decisions, when a more inclusive approach would foster cultural cohesion.

The ABA supports the right of both Aboriginal *and* Post-Settlement communities to be involved with respective national park decisions. Page 25 of the draft states that *"The result is a complex cultural landscape that provides a range of insights into the past and the connections between people and the land"*. We hope this statement is inclusive of both Aboriginal and 'Settlement' land connections.

The draft plan then continues with *"For many visitors, cultural heritage is a key experience of the River Red Gum Parks"* – which we support. However the ABA is disappointed the draft then claims *"Aboriginal cultural heritage has the potential to be the richest experience"*. This statement seems to the ABA to be unnecessarily provocative and risking conflict, by pitting one culture against another. Australia is a multicultural nation, the 'richest' cultural experience will vary from person to person.

### **Water flow volume and timing**

Page 7 of the July 2017 draft explains that water management goals include “to maintain water-dependent ecosystems and improve ecosystem resilience” and to measure “Trends in waterway and floodplain value, ecological character, hydrological water requirements and aquatic health”.

The key reasons *why and how* incorrect flood regimes have already caused rivers in the plan area to deteriorate are virtually lost by using such vague words as *periodic inundation, insufficient flooding, alterations to water-ways, water regulation infrastructure*. The negative impacts from unnatural flooding regimes has been extensively studied over several decades - brief examples include;

- *Timing of flood inundation and return flows is critical (avoiding warmer months of summer and early autumn), as too is the requirement for a drying regime on the floodplain during summer to early winter. [Barmah Forest Seasonal Watering Proposal 2013 – 2014]*
- *Lack of a drying phase in low lying wetlands, consequent change in vegetation, that disadvantage species (grebes, terns, coots, avocets & stilts (Leslie 1998).*
- *Non-palatable Giant Rush has become more widespread, favoured by the hydrological changes caused by river regulation (Chesterfield et al.1984).*
- *Hydrological changes have reduced fish and waterbird populations and their breeding habitats, particularly species dependent upon flood waters. Decline in numbers and species of birds breeding documented, particularly over last 30 years (Chesterfield et al.1984, Leslie 1988).*

The RRG draft plan refers to flood timings on page 37 “The Snowy Mountains Scheme and major dams, such as Dartmouth, Hume and Eildon, have reduced the frequency, extent and duration of winter and spring flooding” – but still fails to explain *why* this timing is so damaging, and that *only* a return to natural spring/early summer flooding (growth period) can reverse the area’s decline.

Daniel Connell, research fellow, Australian National University, notes in his book Water and Politics in the Murray-Darling Basin “For would-be irrigators the problem with the River Murray was that the bulk of the annual flow occurred at the wrong (for farmers) time of year” and the timing of “Peak (Murray) flows under natural (environmental) conditions in the rivers of southern Australia is **winter and spring** but the main growing season when agriculture needs water is *late summer and autumn*.”

### **In conclusion**

The ABA is highly concerned that Parks Victoria risk increasing conflict across Australian cultural communities by suggesting in the draft plan there is the potential for one culture to be richer than another “Aboriginal cultural heritage has the potential to be the richest experience” (page 25).

The ABA strongly recommends that the plan follow the Burra Charter’s position - that co-existing cultural values “should always be recognised, respected and encouraged” and that “This is especially important in cases where they conflict”. The Charter also explains that each of our cultural values reflects “the diversity of our communities, telling us about who we are and the past that has formed us and the Australian landscape” and are irreplaceable, and precious, and “must be conserved for present and future generations in accordance with the principle of inter-generational equity”.

The ABA urges Parks Victoria to urgently resolve critical flood timing conflicts between irrigation and environmental needs. Because if River Red Gum flood timing cannot be addressed; motherhood talk of measuring “Trends in waterway and floodplain value”, “hydrological requirements” and “aquatic health” will not result in enduring, positive environmental outcomes for our River Red Gum Parks.

Yours sincerely



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