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## Submission to Parks Victoria draft Strategic Action Plan “Protection of Floodplain Marshes Barmah National Park and Barmah Forest Ramsar Site 2019 – 2023”.

Thankyou for the opportunity to provide the Australian Brumby Alliance (ABA) submission to Parks Victoria’s “Protection of Floodplain Marshes Barmah National Park and Barmah Forest Ramsar Site 2019 – 2023” (the plan).

### **Barmah Round Table Key Stakeholder input**

The ABA has been involved with providing feedback to the 3 Barmah “Round Table” Key Stakeholder meetings held early 2017, however none of the recommendations or input from the ABA are found to be reflected in Parks Victoria’s draft plan in regard to management of sustainable populations of Barmah’s Heritage Wild Horse population.

### **ABA Recommendations to Round Table**

The ABA recommendations included the retention of Barmah Heritage Wild Horse numbers of around 150 to 180 Wild Horses (Barmah Brumbies) living in the Barmah park area where they have lived for over 150 years.

### **Background**

In 1982, when RAMSAR listed Barmah forest as a wetland of significance, the area already had a long history of horse, cattle grazing and logging (32+ years) that continued until cattle grazing ceased 2007 and logging 2010 when the area became a national park to be managed by Parks Victoria.

The draft plan for Barmah seeks to remove all of Barmah’s Heritage Wild Horse population, which is all that remains of the way of life (horse/cattle grazing and logging) that existed when RAMSAR declared the Barmah wetlands as worthy of being a wetland of significance.

The draft plan states that “*principal factors that are likely to have contributed to the decline in Moira grass extent are:*

- 1. Changes to the natural flooding regime due to river regulation*
- 2. Grazing and trampling pressure by introduced animals, particularly by feral horses (and previously, cattle)*
- 3. Encroachment by invasive plant species”*

The major, significantly devastating change to the Barmah Wetlands has resulted from the implementation of the Snowy Mountain Hydro-Electric scheme that was created to assist farm irrigation and water supply.

**Issue: 95% of Barmah's Moira Grass has been lost since first measured**

At the time Barmah was listed as a Ramsar Site, the draft plan states that the *"Moira grass-dominated grassy Barmah wetlands at Forest represented the largest extent of the species in the Murray-Darling Basin", and that the extent of Moira grass was around 1500 hectares"*.

Parks Victoria's draft also plan states that *"Current water management practices aim to help mitigate the risks to Moira grass plains from river regulation ..... by promoting the winter-spring flooding and summer-autumn dry period that this species requires"*.

However efforts to mitigate the risks to Moira grass plains from river regulation have proved ineffective for years judging by the fig 9 draft plan graph of declining Moira grassland cover.

Even the most recent "environmental flow" that flooded nearly the entire park during the summer season, causing significant negative survival impacts to all of Barmah's species, especially those requiring long dry periods (see Refs below)

**Issue: Draft plan artificial River Regulation lack of control impacts**

Parks Victoria have stated at stakeholder meetings that Barmah's water regime is not under their control, leaving Parks Victoria no way to effectively apply the much needed correction to winter/spring flooding regimes essential for any effective recovery of Barmah's wetlands.

So while Parks Vitoria's draft plan states *"principal factors that are likely to have contributed to the decline in Moira grass extent are:*

- 1. Changes to the natural flooding regime due to river regulation*
- 2. Grazing and trampling pressure by introduced animals, particularly by feral horses (and previously, cattle)*
- 3. Encroachment by invasive plant species"*

The reality is that Parks Victoria has NO ability to reverse the principle factors in points 1-3 above that arise directly from damaging water regimes that followed after the implantation of the Snowy Hydro scheme.

Therefore removing ALL Barmah's Horses (that grazed the area decades before RAMSAR recognised Barmah's healthy environmental values) will not mitigate the ongoing significant decline from environmental water flooding regimes outside of Parks Victoria's control. Put a different way, the Moira grass decline will continue irrespective of the presence or absence, of Barmah's resident Wild Horse population.

**Issue: Claim that Horses pose greatest risk of all Barmah's introduced species**

The draft plan requires *"Parks Victoria to develop strategies to tackle the threats that pose the greatest risk to priority values"*, yet Parks Victoria state they have no control over the current damaging artificial water regimes that pose the most *critical risk* (draft plan) and single out Brumbies from all other introduced species such as deer, pigs and rabbits.

Other Barmah introduced specie populations cannot be counted (draft plan p48). Therefore of the 20 pigs, 34 deer, 7 sheep, and 1 goat in killed 2017/18 (draft plan), there is no way of knowing what percentage of these species population were removed and whether such low numbers of multiple birth species has even slowed their overall population increase.

**Issue: Claims that Brumbies cause detrimental impacts to Aboriginal cultural sites**

Parks Victoria's draft Barmah management plan Figure 3 shows a photograph of Barmah Brumbies walking beside a fence in the Fig 3 photograph titled "Horses traversing a site of Aboriginal cultural significance". Which side of the fence is the fence protecting?

If the fence is holding the horses inside the protected Aboriginal site of cultural significance, why was the area fenced with horses inside? Conversely if the horses are walking along the outside of the protected Aboriginal site of cultural significance, how can they be blamed for damage within the fenced area?

**Issue: Limits of acceptable change**

The draft plan says that an assessment of the ecological character status of the Ramsar Site in 2018 (DELWP, in prep., 2018) found "*evidence of potential change* in the site's ecological character and detected an unacceptable level of change ..... relating to Moira grass extent".

The above draft plan statement infers this assessment is the first time potential change in the extent of Moira grass in Barmah has been recorded - this is very far from the truth. Noticeable loss in the extent of Moira grass cover was found to result from the Snowy Hydro scheme decades ago - see reference examples;

- (1984-1988): 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) as flooding is required to provide suitable nesting conditions & sufficient feed to rear young successfully.
- (1988) Lack of drying phase in low lying wetlands & consequent vegetation change disadvantaged species (grebes, terns, coots, avocets & stilts (Leslie 1998).
- (1984) Non-palatable Giant Rush become more widespread, favoured by the hydrological changes caused by river regulation, has (Chesterfield et al.1984).
- (1986-1988) The condition of flood plain vegetation is strongly influenced by flood timing, frequency, duration and depth. (Chesterfield 1986, Bren and Gibbs 1988).
- (1986) changes in the Barmah area water regime as a result of river regulation on the Murray has allowed *Juncus ingens* to out compete the Moira grass (*Pseudoraphis spinescens*) previously found to a much greater extent(Chesterfield (1986).
- (1987) Some former Moira Grass plains have developed into *rushlands* because of prolonged flooding resulting from higher river levels in summer & autumn; whereas others have been encroached upon by river *red gum* seedlings where regulation caused a reduction in flood frequency (MDBC 1987).
- (1989) Under conditions current in 1989, flood duration had significantly decreased with dry periods lasting for more than 10 months at a time ... and *Sedimentation* in Barmah Forest wetland areas appear to have increased (Leitch 1989).

- (1992) While siltation is a natural process, the rate of *sediment* build-up seems to have accelerated over recent years (DCE 1992).
- (1988/9) Under *natural conditions*, 70% of the forest would be flooded for average of 2.9 mths in 78% of yrs. Since regulation, this level of flooding is only experienced for an average of 1.3 mths in 37% of yrs (Leitch 1989, Bren and Gibbs 1988).
- (1992) Distribution and condition of the shorter-lived *understorey species* are more strongly influenced by recent watering conditions (MDBC 1992).
- (2002) Floods more likely to occur between Dec & April (Chong & Ladson 2002).
- (2010/11) *Blackwater* event December 2010 resulting in substantial fish & crayfish death in the Murray River downstream of Barmah Forest (King et al. 2011), appearing to result in complete loss of crayfish downstream of the forest.
- (2013/4) Barmah forest seasonal watering Proposal for 2013-2014 [*return to natural flooding*] Concerns now exist for alarming decrease in extent & cover of Moira Grass, that used to dominate the treeless Barmah Forest floodplain and serve as a major waterbird feeding ground on which Ramsar status was bestowed..

**Issue: Why claim that removing all Barmah Heritage Horses is essential when;**

- Despite many references showing *significant* damage from altered water regimes, the draft plan (2019) to recover Moira grasslands just claims “Of all introduced grazing species present, feral horses are currently considered the most destructive and their removal from the Barmah Forest is an immediate priority”. None of the above *references* refer to damage being caused by an ongoing horse presence.
- The draft plan Fig 9 graph of declining Moira grass cover is consistent with Parks Victoria’s statement that “Regulation of rivers began almost a century ago”, and
- Forest Commission Barmah map 1930 estimated 13.5% (4,050 ha) of forest as open Moira Grass plain. Over the next 50 years of altered flood regimes show Giant Rush & River Red Gums invading to reduce Moira grasslands to 5.5% (Chesterfield 1986).

**Rather than repeat our earlier Round Table discussion feedback, please see attachments;**

- att1 AlpsBogongBarmahCulturalSig
- Att2 Reply to RT Brumby impact claims

**Conclusion**

Parks Victoria do not acknowledge that the Barmah wetlands had had a continuous history of horses/cattle grazing and logging at the very time RAMSAR accepted Barmah’s area as a wetland of significance alongside grazing/logging activities.

The plan p36 states “*Managing the flood regime to maintain a balanced mosaic of habitats is critical in the protection of Moira grass plains*”. If managing flood regimes is “critical”, this must be resolved first - before the balance of Heritage Wild Horses and Moira grass can be managed to reflect pre water regulation with Horses grazed alongside healthy Moira grass.

Yours sincerely,



Australian Brumby Alliance Inc.