

This is the text of the submission by the Victorian National Parks Association to the Victorian Government's Alpine Grazing Taskforce.

The original VNPA submission was accompanied by a number of photographs illustrating the damage caused by grazing in the Alpine National Park. Many of these photographs can be found elsewhere on this website.

The Taskforce had asked for submissions dealing with the benefits and impacts of cattle grazing in the Alpine National Park, and implications for renewal or non-renewal of licences to graze cattle in the park. Issues of the cost of grazing to the community, and opportunities for maximizing natural, economic, social and cultural values, were to be considered by the Taskforce.

**Victorian National Parks Association
Submission to the Alpine Grazing Taskforce**

June 18 2004

Introduction

The Victorian National Parks Association has long been convinced that cattle grazing in the Alpine National Park (ANP) is completely inconsistent with the management objectives of a national park, and that this activity should cease at the earliest opportunity.

While Victoria's *National Parks Act 1975* (NP Act) currently allows the licensing of cattle grazing in the park, there is no evidence that the management agencies (Parks Victoria and DSE) can manage grazing in a manner consistent with responsible conservation management principles, or with the objectives of the Act (s. 4).

We believe these fundamental provisions of the NP Act, together with the internationally accepted IUCN criteria for national park management, mean the concept of "effective management of grazing within the park" has always been an oxymoron.

We note that the IUCN's protected area Category 2, National Park, is identified as a:

'Natural area of land and/or sea, designated to:

1. Protect the ecological integrity of one or more ecosystems for present and future generations;
2. Exclude exploitation or occupation inimical to the purposes of designation of the area and;
3. Provide a foundation for spiritual, educational, recreational and visitor opportunities, all of which must be environmentally and culturally compatible.'

There is abundant scientific evidence that cattle grazing is 'inimical to the purposes of designation' of the ANP, indeed there has been evidence for some time, and we do not intend to re-establish the arguments in this submission.

We are quite satisfied with the conclusions of two impeccable reports to the Government agencies responsible, assessing the accumulated scientific evidence on grazing.

These reports are:

1/ Williams, R. J. Papst, W. A. and Wahren, C-H (1997) *The Impact of Cattle Grazing on Alpine and Sub-alpine Plant Communities of the Bogong High Plains*. Report to the Dept of Natural Resources and Environment, Victoria.

It found (p.40) that:

“Continued grazing is an undoubted cost to national park values, and, indeed, compromises national park management. Any claims made with respect to the benefits of grazing to alpine ecosystems are not supported by scientific evidence.”

2/ Groves, R. H. (1998) *Grazing in the Victorian High Country* Report to Parks Victoria.

This report found that (p. 3):

“The alpine and sub-alpine ecosystems and landscapes of southeastern Australia are significant to all Australians because of their inherent value for nature conservation, water-yielding capacity, landscape and wilderness values and for recreation, as well as for their cultural history of human usage.”

and on , p 6.:

“There is no scientific reason why grazing by non-native animals should not have been excluded from the Victorian high country as early as 40 years ago. That grazing under licence has persisted in Victoria to the present is an indictment of Victorian land management authorities, including Parks Victoria and its predecessors, who have failed to take into account the scientific evidence available and give it its due in the politics of making decisions on land management.”

There is no need for further scientific review of this issue. The available evidence is more than enough to justify removal of grazing from the park.

But we also note a number of listings under Victoria’s Flora and Fauna Guarantee Act 1988 (FFG Act) which clearly implicate grazing in the park as a threat to the health, indeed survival, of natural systems.

In particular, *Soil Erosion and Vegetation Damage and Disturbance in the Alpine Regions of Victoria Caused by Cattle Grazing* is listed as a Potentially Threatening Process (Nomination no. 211).

And cattle grazing is clearly and significantly implicated in the listings and action statements of two additional FFG Threatening Processes: the *Increase in Sediment Input to Rivers and Streams due to Human Activities* and *Degradation of Native Riparian Vegetation along Victorian Rivers and Streams*.

That the recommendations in the Action Statements of these two listings are effectively ignored, within a National Park that ostensibly ‘protects’ the headwaters of most of the significant river systems in Eastern Victoria, beggars belief.

A number of alpine and sub-alpine species and communities affected by cattle grazing are separately listed as threatened under the FFG Act, notably the:

Alpine Water Skink *Eulamprus kosciuskoi* (Nom. 222; Action Statement 114);

Alpine Bog Skink *Pseudemoia cryodroma* (Nom. 390);

Alpine She-oak Skink *Cyclodomorphus praealtus* (Nom. 393; Action State’t 113);

Mountain Daisy *Brachyscombe tenuiscapa* (Nom. 169);

Silky Daisy *Celmisia sericophylla* (Nom. 220);

Drapetes Kellera laxa (Nom. 179);
 Dwarf Sedge *Carex paupera* (Nom. 176);
 Rock Tussock Grass *Poa saxicola* (Nom. 177);
 Wire-head Sedge *Carex cephalotes* (Nom. 156);
 Silver Caraway *Oreomyrrhis argentia* (Nom. 178);
 Carpet Willow Herb *Epilobium willisii* (extinct?) (Nom. 171);
 Mountain Cress *Drabastrum alpestre* (Nom. 174);
 Fairy Bluebell *Wahlenbergia densifolia* (Nom. 175);
 Rough Eyebright *Euphrasia scabra* (Nom. 153);
 Snow Pratia *Pratia gelida* (Nom. 467);
 Bent Grass *Deyeuxia affinis* (Prelim. Rec. 655)
Caltha introloba Herbland Community (Nom. 202);
 Alpine Snowpatch Community (Nom. 192);
 Alpine Bog Community (Nom. 159);
 Fen (Bog Pool) Community (Nom. 182).

In addition a further 30 (non-FFG listed) plants, all within grazing licence areas of the Alpine National Park and likely to be affected by grazing, are listed as vulnerable or threatened in Victoria:

<i>Aciphylla glacialis</i>	Snow Aciphyll
<i>Barbarea grayi</i>	Native Wintercress
<i>Cardamine astoniae</i>	Spreading Bittercress
<i>Cardamine franklinensis</i>	Franklin Bittercress
<i>Carex Archeri</i>	Archer's Sedge
<i>Carex echinata</i>	Star Sedge
<i>Carex hypandra</i>	Alpine Fern-sedge
<i>Coprosma pumilla</i>	Dwarf Coprosma
<i>Craspedia alba</i>	White Bully-buttons
<i>Craspedia lamicola</i>	Allied Bent-grass
<i>Diurus ochroma</i>	Pale Golden Moths
<i>Epilobium tasmanicum</i>	Snow Willow-herb
<i>Erigiron conyzoides</i>	Daisy Fleabane
<i>Euphrasia collina ssp diversicolor</i>	Purple Eyebright
<i>Euphrasia crassiuscula ssp glandulifera</i>	Thick Eyebright
<i>Euphrasia eichleri</i>	Bogong Eyebright
<i>Juncus antarcticus</i>	Cushion rush
<i>Luzula atrata</i>	Slender woodrush
<i>Oreomyrrhis brevipes</i>	Branched Caraway
<i>Oreomyrrhis pulvinifica</i>	Cushion Caraway
<i>Pelargonium helmsii</i>	Mountain Stork's-bill
<i>Poa labillardierei var acris</i>	Sharp Mountain Tussock-grass
<i>Poa petrophila</i>	Rock Tussock-grass
<i>Prasophyllum rogersii</i>	Marsh Leek-orchid
<i>Prasophyllum sp aff brevilabre</i> (SW Vic)	Western Short-tip Leek-orchid
<i>Ranunculus mueleri var muelleri</i>	Felted Buttercup
<i>Rytidosperma australe</i>	Southern Sheep-grass
<i>Senecio georgianus</i>	Grey groundsel (extinct already?)
<i>Uncinia sulcata</i>	Small Hook-sedge
<i>Utricularia monanthos</i>	Tasmanian Bladderwort

A host of others are listed as rare.

The existence of such a suite of listings in relation to clearly identified threatening processes in such a significant protected area must be ringing alarm bells within a Government dedicated to responsible conservation management.

The current and potential benefits and impacts of cattle grazing in the Alpine National Park

The environmental impacts of alpine cattle grazing are well established, considerable, and quite contrary to Victorian, national and international objectives for national park management (see above).

So far as we know, there are no claims to environmental benefits of cattle grazing in the park that have survived the rigours of scientific assessment. This includes claims (in the media) that grazing reduces weeds and feral animals.

(In relation to weeds, we would like to reiterate our warning to the Government of the capacity of at least two recently introduced Hawkweeds to spread across the High Country. Essentially, these weeds take advantage of bare ground (as do most weeds), and cattle cause bare ground. The Hawkweed issue alone should be more than enough to justify removal of cattle from the High Country immediately, and similar action on all hard-hooved animals in the region.)

In relation to fire control, we accept the recommendations of the Victorian Government's commissioned *Report of the Inquiry into the 1002-2003 Victorian Bushfires*, the 'Esplin Report'. This established that, though grazing may slow the spread of fire in some instances, cattle's capacity to selectively graze green and/or fleshy vegetation, together with their capacity to encourage the spread of flammable shrubs, means that:

"according to available scientific evidence, a decision regarding cattle grazing in the High Country should not be based on the argument that 'grazing prevents blazing'.

We also note that, though it is possible to find unburnt sections of grazing licence areas within a fire that covered around one and a half million hectares, essentially, most licence areas in the path of the fire were 100% burnt. This was also the case in the Caledonia fire of 1998, and apparently in the 1939 fires, when grazing was much heavier.

Essentially, any claims that cattle are good for the ecological management of the park are spurious.

Implications of renewal of licences

Economic and social viability of local communities

The economic future of rural Victoria is being affected by two significant changes in rural economies and communities.

1/ The movement to modern, efficient and environmentally sustainable agriculture.

In this regard, we have little to say other than we see no compelling need to continue heavily subsidized access to privileged agistment for a few farmers, allowing continuation of environmentally irresponsible 19th century farming practices that have long-since been abandoned by the great majority of farmers in Victoria.

There are many better options.

In regard to any need for re-adjustment of farming practices by those currently accessing grazing privileges in the Alpine National Park, we do support transitional assistance where appropriate, in the context of assistance given to others in need in the local rural communities where demonstrable hardship exists. More effective, however, will be assistance in line with the following.

2/ The growth of tourism, particularly ecotourism.

This rapidly growing section of the economy has had a significant social effect on regional Victoria. It provides increasing opportunities for young people to stay in the region, primarily through the great range of employment opportunities offered by the tourism industry, and also by the secondary industries those activities support.

Indeed the Alpine High Country Region currently attracts over 2 million visitors per annum and there is continuous growth and improvement in the products that support this level of visitation.

We note that a *Tourism and Conservation Partnership Initiative* is currently being developed by the Alpine Shire.

In this program, “the *Alpine Tourism and Destination Plan* has identified nature based adventure and activities as a primary product strength of the region and Alpine Regional Tourism (ART) is committed to ensuring that all future development and marketing continue to strengthen, protect and enhance our natural environment.” Indeed the Alpine Shire is currently developing a “*Sustainable Environmental Tourism Charter*”. It would be odd indeed, if the Government, the managers of the most important environmental asset in the region, the Alpine National Park, was seen to be in acting in contradiction of that charter by perpetuating grazing practices which compromise that asset.

There are several opportunities for the region in this regard:

- a) The development of a major regional visitor centre focusing on the long cultural heritage of the region, as well as the outstanding natural values of the region. While the history of the cattlemen and horsemen of the area could have some prominence, it would be imperative to also feature the very long Indigenous association with the alps. It would also be appropriate (and useful) to feature the long history of naturalists in the alps, and of recreation in the area (eg the development in the 19th century of the Bright Alpine Club). Such a center could be located at Omeo, at Bright, at Mount Beauty, or a number of other locations.
- b) A similar project could be spread across the region, with a series of smaller information centres focusing on different aspects of the alpine story. This could mean, for example, a cattlemen’s center in Omeo, and the history of Indigenous occupation (subject to discussion with the relevant Indigenous communities) at, say, an information center at Hotham or Falls Creek. The history of recreation and the ‘exploration’ of natural features could be in Bright. Further development of the Mount Beauty visitor center could also be incorporated in the proposal. In this way, a journey along the Alpine Way could be a journey of cultural exploration, particularly if on-site interpretation of significant sites (eg huts) was included.
- c) Encouragement and training for ecotourism operators in the region. This could clearly include support for people with the capacity to give real

experiences of the Indigenous heritage and more recent cultural heritage of the alps.

Activation of these proposals should come through development of an **ecotourism interpretation plan for the Alpine National Park and associated region** as soon as possible.

Throughout the region there are many active historical societies that have accumulated a great deal of information and many remarkable artifacts. These organisations and associated individuals, together with the Indigenous communities, could, and indeed should, be called upon in the development of such a venture.

Support for promoting the annual cattlemen's get together could be appropriate.

In addition, we understand summer visitation in and around alpine resorts in NSW is significantly higher than in Victoria. One very likely contributor to this situation is the significant lack of summer wildflowers in the Victorian Alps wherever grazing occurs. The return of abundant wildflowers, particularly swathes of Snow Daisies around the Christmas/New Year break, could well regenerate within around ten or fifteen years in some areas south of Falls Creek, for example, when cattle grazing finishes.

Cost of management services for the ANP

There are several serious economic issues raised by any proposal to renew licences to graze cattle in the park (quite apart from the ongoing, inestimable, cost of damage to natural systems).

1/ The increasing cost of management of cattle grazing in the park.

Most particularly we believe the considerable cost of management (our estimate is somewhere over \$500,000 per year), given the scarce resources available, is significantly compromising conservation programs elsewhere in Victoria.

We believe the total cost incurred in cattle management cannot entirely, even substantially, be identified in budget figures, but is buried in unidentified allocations of staff time, legal and other costs (including, for example, the cost of this Taskforce inquiry).

If grazing was to continue, there would presumably be an attempt to protect 'significant values' in the future. But essentially, any attempt to protect such values (quite apart from the understanding that management of a national park should aim to protect *all* natural values, not just "significant" values) would greatly increase the cost to the taxpayer and the drain on conservation budgets.

For example, we have had an estimate prepared for the cost of rough protection (essentially electric fencing) for the four FFG nominated communities (*Caltha introloba* herbland, Alpine bog, Alpine Snowpatch, and Fen) and three FFG listed species (Alpine Water Skink, Alpine Bog Skink and Silky Daisy) in the area of the Bogong High Plains only. (Note that there are other listed species on these plains.)

Assuming the fencing takes in rough boundaries, including several communities at once (this minimizes expenses, but excludes a much greater area from grazing) the cost would be around \$150,000 for the Bogong High Plains alone.

Then there are ongoing maintenance costs, snow season removal and re-establishment costs, and we have still only looked after *some* of the FFG-listed species, and only in *part* of the park.

If we get serious about protection of wetlands and waterways (and we should), then there would be a clear need to put in dams, or cart water to tanks, to allow cattle to drink. And fencing, already far too evident within the park because of current licence management, would become one of the most obvious features in the landscape.

The National Park would look like a farm.

And the cost, though impossible to estimate meaningfully, would be very large indeed.

There are other ‘possible’ options, such as increased supervision of cattle, but the unreliability of this is far higher than the already unreliable fencing option.

Security of natural resource values and viability of the park

The security of natural resource values is a difficult thing to achieve, given threats of weed invasion, global warming and a range of impacts from feral animals and even visitor use.

The most effective way to work towards this is by dedicated conservation protection for the park, under a well developed and respected management plan, (we are, on most instances, very supportive of the current plan) and by resourcing the management of the park to enable achievement of conservation programs.

Visitor and local community education is another very important element in such a program. Nothing guarantees compliance with management objectives more than understanding. In this respect, involvement of the local community and tourism interests, as well as conservation groups and scientists, in the development of a new management plan is important.

Need we repeat, hard-hooved animals must be removed from the park.

There are potential employment opportunities for cattlemen and their families in regard to park management and interpretation, and an investigation of proposals for wild horse management in Kosciuszko National Park could be very constructive here.

Possible future options for cattle grazing in the ANP

There are none.

(We note, however, that the majority of the public land grazing licences in the High Country region are outside of the park. The VNPA takes no issue in this instance with “forest grazing” licences.)

Opportunities for maximizing natural, economic and cultural values

The single greatest opportunity for maximizing natural, economic and cultural values of the park and the region, is the formation of a single great Australian Alps National Park, encompassing all contiguous parks currently under the Australian Alps National Parks Memorandum of Understanding (MOU).

Such a park would be managed by existing agencies, under existing State and Territory legislation, with little change. Significantly, however, the MOU should be upgraded to a cross-border Management Agreement.

More information on this proposal, and a proposed management structure, can be found on the website www.onebigpark.com, hosted by the National Parks Associations of NSW, the ACT and Victoria.

A three-State Australian Alps National Park, with truly dedicated and consistent conservation management, can become the core area of a region with World heritage listing.

We should not make the mistake of ignoring the huge social, tourism, economic and environmental benefits of that.

Summary

The damage to the Alpine National Park by cattle is considerable, obvious, and well-established in a great many scientific studies.

That, within a National Park, the headwaters of so many of Victoria's rivers are treated with less respect than creeks and streams on private land throughout Victoria, is difficult to comprehend.

The cost to the Government (and hence the people of Victoria) of management of this activity is onerous, unjustified by any standards of reasonableness, and compromises far more sensible park management programs elsewhere.

We believe the costs of management will grow exponentially, as will public liability and other legal costs, if grazing in the park continues.

We believe the economic future of the farmers involved cannot realistically be tied to an unworkable, environmentally unsustainable and uneconomic practice.

The economic future of the region is, however, tied very solidly to four-season nature-based tourism.

This can be sensibly, and very effectively, tied to the formation of a single great Australian Alps National Park, leading to possible World Heritage recognition of the region.

This future could be very bright.

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Appendix 1

Some quotes from the science relating to grazing in the high country

Costin, A. B. *The Grazing Factor and the Maintenance of Catchment Values in the Australian Alps*. January 1958

‘It is concluded, therefore, that present-day grazing in the Australian alps is not consistent with the preservation and improvement of catchment values.’ P.12

Costin, A.B. *Report on inspection of Plants of the Bogong High Plains Area*. May 2-6 1977

‘The condition of the vegetation and soil in the Loch-Hotham area (now protected from grazing) has noticeably improved during the last 20 years.’ Most bogs and snowpatches are also recovering.’

‘On the more extensive Bogong High Plains (where cattle grazing continues) the same upward trend is not apparent, except in the enclosures...’ ‘Likewise the bog and snowpatch areas examined show no substantial recovery and, in many places, active deterioration and erosion continue.’

Carr, S.G.M. (Maisie Fawcett) *Report on Inspection of the Bogong High Plains* 1977

‘...it can be concluded that protection from grazing and absence of fire results in (a) the development of luxuriant vegetation which provides adequate cover for the soil surface, and (b) promotes an improvement in soil structure and presumably in the hydrological characteristics of the mossbeds and their catchments.’

van Rees, H. *Behaviour and diet of Free-Ranging Cattle on the Bogong High Plains, Victoria* 1984

‘As most of the free-flowing water accessible to cattle is found in mossbeds, cattle by necessity used mossbeds for drinking.’ P 62

‘Overgrazing of rangeland by herbivores results in a loss of cover of preferred dietary species.’ ‘In the absence of grazing the composition of the grassland community changes rapidly with several of the preferred species making spectacular increases in cover.’ P 125.

Williams, R. J. *Aspects of Shrub-Grass Dynamics on the Bogong High Plains (sub-alpine)* PhD thesis, 1985

‘...The contention that grazing is a primary (or even the primary) factor preventing the spread of shrubs on the High Plains is an inappropriate application of the ecological evidence.’ ‘The continuation of grazing as a means of controlling the cover of shrubs cannot be recommended in the face of the evidence presented both in this thesis, and in the various publications of S.G.M. Carr, A.B. Costin and D.J. Wimbush.’

Van Rees, H. and Holmes, J.H.G. *The Botanical Composition of the Diet of Free-Ranging Cattle on the Alpine Range in Australia*. Journal of Range Management 39 (5) Sept 1986

‘Overgrazing of rangeland by herbivores results in a loss of cover of preferred dietary species. This enables less preferred plants to increase in cover through reduced competition by the preferred plants...’

Williams, R.J. and Ashton, D.H. *Effects of Disturbance and Grazing by Cattle on the Dynamics of Heathland and Grassland Communities on the Bogong High Plains, Victoria*. Australian Journal of Botany 1987, 35 pp. 413-31

‘On the basis of present evidence, continued grazing by cattle as a means of inhibiting shrub expansion on the Bogong High Plains cannot be recommended.’ ‘...the continued grazing of cattle within the Bogong National Park is not compatible with strict values of nature conservation.’

McDougall, K.L. *The Effect of Excluding Cattle from a Mossbed on the Bogong High Plains, Victoria*. Sept. 1989

Abstract: ‘The ungrazed mossbed appears to be better serving its role filtering water that is used for the production of hydro-electricity.’

Williams, R.J. *Cattle Grazing within Sub-alpine Heathland and Grassland Communities on the Bogong High Plains: Disturbances, Regeneration and the Shrub-Grass Balance* Proceedings of the Ecological Society of Australia, 1990, 16 2555-265.

‘There is ample evidence indicating that the grazing of domestic livestock within the Australian high country is incompatible with nature conservation values.’

‘The continuation of grazing as a means of controlling the cover of shrubs on the Bogong High Plains, therefore, cannot be recommended as a management option, given the weight of the experimental evidence against the practice collected over four decades...’

Wahren, C.H.A. Papst, W.A., Williams, R.J. *Long-term Vegetation Change in Relation to Cattle Grazing in Sub-alpine Grassland and Heathland on the Bogong High Plains: an analysis of vegetation records from 1945 to 1994*.

‘In the pretty Valley... improvement will occur in the absence of grazing.’

‘In the Rocky Valley... there was no evidence that grazing has reduced shrub cover, and therefore potential fire risk, in open heathland.’

‘...grazing by cattle has substantial impacts on the composition and structure of sub-alpine vegetation.’

‘In grassland... continued grazing... will not reduce the risk of fire in such communities.’

Kimpson, K. *The Effects of Cattle Grazing on the Diversity and Abundance of Terrestrial Arthropods on Poa hiemata Grassland on the Bogong High Plains*. May 2001

‘...the species composition of arthropods was significantly different between the grazed and ungrazed sites... most probably related to differences in moisture content in the vegetation and top layer of soil and the species composition of the vegetation, which are influenced by cattle grazing.’

Simpson, L. *Assessment of the Effect of Cattle Exclusion on the Condition and Recovery of Sub-alpine Streams*. April 2002.

‘The present study demonstrated that exclusion of cattle has positive benefits for aquatic ecosystems... removal of grazing from sub-alpine catchments may release short-term benefits to some features of the aquatic ecosystem, with continued improvement up to 40 years... However, (recovery of) large-scale features such as channel morphology may take much longer.’

Appendix 2

Australian Alpine References

100 research references on the Australian Alps

(These papers either deal with the effects of grazing, or provide base data for other grazing-related studies).

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