



**The South Australian Ornithological Association Incorporated trading as Birds SA
c/- South Australian Museum, North Terrace, Adelaide SA 5000
(ABN 76 339 976 789 - Not For Profit)**

7 August 2023

To: Department for Environment and Water National Parks and Protected Area Program, GPO Box 1047 ADELAIDE SA 5001/Sent by email: on to DEWFireManagement@sa.gov.au

Re: Draft Parks of Kangaroo Island Fire Management Plan

Birds SA is the operating name of the South Australian Ornithological Association, which is the longest running ornithological association in Australia, having been established in 1899. The Association currently has approximately 1,000 members with new memberships growing strongly. Birds SA is affiliated with the national bird conservation organisation, BirdLife Australia.

Primary objectives of Birds SA include:

- to promote public understanding of the importance of South Australian birds and their natural habitats;
- to support the conservation of Australian birds and their natural habitats;
- to take action, including advocacy, to maintain, protect or enhance the conservation of South Australian birds and their natural habitats.

Further information about Birds SA can be found at: <https://birdssa.asn.au/>

Birds SA welcomes the opportunity to contribute to this consultative process.

Comments

Birds SA believes that the Draft Parks of Kangaroo Island Fire Management Plan contains numerous deficiencies and is inadequate as a basis for managing the impact of fire on the sensitive ecosystems and threatened biological diversity of the island.

1. The consultation process has been inadequate.

Birds SA believes that the plan requires a far higher level of consultation with interested parties and stakeholders. Other than some consultations with residents and interested parties on Kangaroo Island, we are unaware of any attempt to hold in-person and in-depth briefings on the plan with major conservation groups in the State. The online interactive map has disenfranchised a number of people who are unfamiliar with this technology and struggled to make sense of the map. References to the scientific basis for impacts of fire management on biodiversity should have been more obvious as they are easily over-looked. This has led to questions arising on the extent of scientific justification under-pinning the plan.

2. Justification for the fire management zonings of specific protected areas is often missing or inadequate.

There needs to be examples of evidence-based decision making through references to relevant research about treatments that are being applied. The objectives of zonings for parks are only described in general terms which makes it unclear how different fire management strategies will impact on sensitive ecosystems and biological diversity.

Many of the protected areas are un-zoned including large parts of Flinders Chase NP and most of the parks on the northern coast that are essential habitat for threatened Glossy Black Cockatoos. The explanation for this is inadequate.

More areas should be included in the Exclusion Zone category – especially those areas important for GB Cockatoo with long-lived species such as banksias and sheoak.

3. There is no information on long-term monitoring of impacts.

In order for the objectives of the fire management plans to be assessed there will need to be extensive pre- and post-fire monitoring over many years. The draft plan does not appear to make any commitments to this essential component. Without such monitoring it will be difficult, and perhaps impossible in most cases, to determine whether the environmental objectives of the plan have been achieved.

4. There is inadequate information about the resources required to monitor and manage potential negative impacts from existing and new access tracks.

The dedication of new tracks and zoning of large areas within the Ravine De Casoars as Strategic Fuel Management Zone (S) is not adequately justified. There is no information about what resources will be allocated to the control of pests, weeds and pathogens (e.g., phytophthora) in sensitive areas opened up by new tracks.

In summary, Birds SA does not believe the current Draft Parks of Kangaroo Island Fire Management plan is adequate and requires considerably more consultation and specific scientific-evidence for fire management zonings than has been presented.

Regards,



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Chair, Birds SA Conservation Sub-Committee

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