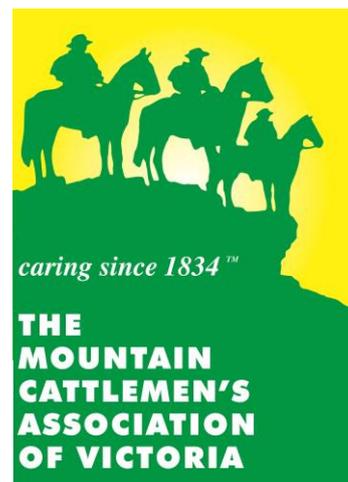


MCAV Submission in support of the Alpine Grazing Trials in Wonnangatta – February 2014

- ✓ We support the proposed grazing trial in Wonnangatta.
- ✓ We support a combination of planned burning and grazing to manage the fuel loads in the Wonnangatta valley.
- ✓ We do not support the current “do nothing” approach to management within the Alpine National Park.
- ✓ Future management of the Alpine National Park and surrounding State forest should be on what is termed a “landscape ‘scale. Lines on a map should not necessarily dictate different management.
- ✓ Grazing is clearly identified as being a suitable management tool in the Wonnangatta /Moroka management plan.
- ✓ We support more scientific research on alpine grazing and fuel reduction.



ABN 25342519237

Reg No A2117

www.mcav.com.au

secretary@mcav.com.au

✉ Shop 11, 20 Highett St
Mansfield VIC 3722

☎ 03 5779 1747

What do the Mountain Cattlemen have to offer?

The bond that has held the Mountain Cattlemen together is a profound and intergenerational commitment to the High Country and a compelling devotion to land's welfare. For 180 years Mountain Cattlemen have honed their craft through the hands-on experience that only working and living in an environment can provide. No other group today possesses such detailed and pervasive knowledge of the High Country. It has always been the culture of the Cattlemen to share this knowledge and the country itself with all comers.

The Mountain Cattlemen culture is inextricably connected to the practice of alpine grazing; they cannot survive as a group or as a culture if alpine grazing is extinguished. The wanton destruction of this culture for partisan political reasons robs Australia of a unique link between its pioneering past and its cosmopolitan future. Sadly, the High Country has been denied the management benefits that could flow from the Cattlemen's contribution and experience, and could be condemned to continue on its present course of well-intentioned but wildly misguided decline.

The Wonnangatta Trial

This is an opportunity to verify what the Cattlemen have been saying for many years; that grazing reduces fuel and hence the intensity of wildfire.

Instigating the grazing trials is an opportunity to draw on the Cattlemen's knowledge and allow them to teach the next generation the craft of Alpine grazing.

There has never been a more rigorous scientific trial on grazing and fuel loads conducted than the one proposed. The question needs to be asked why sections of the scientific community are so against the proposal to conduct this professional trial. Scientists should be welcoming this Government commitment to more scientific work. There can never be enough credible science.

The Heritage

Wonnangatta Station has been a cattle station since early European settlement. It is the cultural home of the Mountain Cattlemen. Several Mountain families have personal and historic connections to the valley and visit it each year. The knowledge on how best to manage this remote area has been handed down through the generations. The Cattlemen should have significant input into the future management of an area as they know this land probably better than anyone.

The cattlemen's knowledge must be preserved and respected. As seen below it can be utilised effectively as they are willing to share their knowledge and experiences of the High Country. The benefits of involving the Cattlemen in the management of the High Country cannot be underestimated.

Article 8 (j) of the Convention on Biological Diversity (of which Australia is a signatory) states:

(j) Subject to its national legislation, respect, preserve and maintain knowledge, innovations and practices of indigenous and local communities embodying traditional lifestyles relevant for the conservation and sustainable use of biological diversity and promote their wider application with the approval and involvement of the holders of such knowledge, innovations and practices and encourage the equitable sharing of the benefits arising from the utilization of such knowledge, innovations and practices.

The Politics

It appears the reason the proposed trial at Wonnangatta has been declared a controlled action by the present Minister for the Environment Greg Hunt is as follows.

Alpine Grazing in the Alpine National Parks and Reserves defined in Regulations as an "Action"

On 19 October 2011 the regulations to the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) were amended to include the grazing of domestic stock within the Alpine National Park and Reserves as an action to which requiring approval under the EPBC Act.

The regulation specifies that grazing of domestic stock including cattle would impact on the heritage values of the Australian Alps Heritage Area. Future or new grazing activities

proposed within the Australian Alps Heritage Area, including the Alpine National Park, will need to be assessed under the EPBC Act.

MCAV Response

It appears that the present Minister had no option but to declare the proposal a controlled action because when the original six trial sites were created by the Victorian Government in early 2011, the previous federal minister for the Environment Tony Burke changed the EPBC regulations for political reasons, targeting cattle. It created a situation where cattle grazing now supposedly threaten the heritage values of the Park. This is nonsense and contradicts the reality, where the presence of the Cattlemen and their cattle has been identified as one of the key cultural and heritage features of both the NSW and Victorian Alpine Parks.

The following entry in the Government Gazette proves the point:

Commonwealth of Australia Gazette, No. S237, Friday, 7 November 2008
Published by the Commonwealth of Australia, Cat. No. S23708

Transhumant Grazing

The AANP has outstanding heritage value for its association with historic transhumant grazing that commenced in the 1830s. The practice of using alpine high plains to graze stock during the summer months was a significant pastoral activity of the nineteenth and twentieth centuries and was continuously practised for a period of over 150 years; making a considerable contribution to the early pastoral industry of south-east Australia. Transhumant grazing created and sustained a distinctive way of life that is valued as an important part of Australia's pioneering history and culture. Evidence of transhumant grazing includes huts, the former grazing landscapes, stock yards, and stock routes.

The State of the Wonnangatta Valley

The reports posted on the DEPI website containing information supporting this consultation identify that Wonnangatta Valley is badly degraded. The Cattlemen agree with this description. Weeds, feral animals and historic damage by four wheel drive vehicles on the flats have left the valley in poor shape. The lack of fuel reduction means the flats are choked with vegetation and are virtually inaccessible by foot or in some places even on horseback. The thick vegetation hides deep bog holes (originally caused by vehicles) which can cause serious injury to anyone who ventures into the area. The deer numbers are rampant and now wallowing in those bog holes. The blackberries have to be seen to be believed.

If the Wonnangatta flats were regularly grazed, as in the past, access would become much better for visitors. The amount of old vegetation would be far less and over time the grazed flats would remain green through most of the summer. This would then allow much better access for weed control, contractors and recreation and greatly reduce the fire risk to visitors.

We enclose two photos (1984 and 2012) that demonstrate those points. Both photos were taken in the summer from the same area. The 1984 photo (left) was taken while Wonnangatta was a working cattle station.



The Science

There have been many claims by a section of the scientific community that “all the science has been done in the Alpine National Park and it has been proven that grazing does not reduce fuel or the intensity of bushfires”. This is not correct.

The small amount of scientific work that has been done, mostly on the Bogong High Plains, has been extrapolated out by opponents of grazing as applying to all the Alpine National Park. This approach does not stand scrutiny and is full of discrepancies. We note that Professor Mark Adams (one of Australia’s most prominent scientists in the fields of fire and ecology) with others undertook a study as part of the Bushfire Cooperative Research Centre’s High Fire research program in which he reviewed the scientific literature concerning the interaction between grazing and fire in the Australian Alps. He concluded that **“there remains insufficient information to provide any definitive scientific statement because all previous studies were inadequately designed, including lack of appropriate baseline data, spatial scale and replication”**.

The MCAV believes this applies to the studies referred to below.

Two Bogong High Plains studies are questionable

1. One particular study by Williams R, Wahren C-H, Bradstock R. and Muller W (2006) ---*Does alpine grazing reduce blazing? A landscape test of a widely-held hypothesis*. Austral Ecology (2006) 31, 925–936) is heavily relied on by opponents of grazing (and was also relied on by the Alpine Grazing Taskforce in making its recommendations)
 - This study is one of the most flawed.
 - The study used field observation of burned and unburned points along transects in grazed and ungrazed areas of Bogong High Plain. It relied on a relatively small number of points given the very large area being studied.
 - Incredibly, no satellite images showing burnt and unburnt areas were used despite the scientists acknowledging in their report they were such images were available.
 - A key conclusion of the study is that “we found no evidence that grazing as a main effect reduced fire occurrence or severity” and went on to say “These findings lead us to reject the hypothesis that ‘Alpine grazing reduces blazing’”

- The statistical study conclusions conflict in a major way with the visible evidence from DEPI satellite images of the burnt areas on the Bogong High Plains. DEPI's satellite images of the burned area clearly show very big differences in the proportion of grazed area burnt and proportion of ungrazed area burnt (much lower in grazed areas).

This raises serious questions about the validity of the study findings:

- Why is the ground based statistical analysis different from the directly observable satellite image evidence?
- Why wasn't the satellite imagery used in the study when it was available?

These differences can clearly be seen in DEPI's referral documents containing the Mountain Cattlemen's model of grazing and burning in the high country (pages 35 and 36) prepared by GHD in 2011. This report highlights the deficiencies with the statistical study by Williams and others:

The GHD report on page 28 states in part:

"..... cattlemen consider that the researchers' key conclusion that 'the use of livestock grazing in Australian alpine environments as a fire abatement practice is not justified on scientific grounds' (a conclusion heavily relied upon by Victoria's Alpine Grazing Taskforce) is tricky and misleading. It is not clear whether it means that the body of scientific research is insufficient to justify a conclusion that grazing is an effective fire abatement practice, or whether it is meant that there is sufficient scientific evidence to justify a conclusion that grazing is not an effective fire mitigation practice in alpine environments.

A more correctly stated finding would be that there is insufficient scientific evidence to form a reliable conclusion either way as to whether grazing reduces blazing. The study itself should only be entitled to claim scientific evidence for a lack of statistical difference in fire occurrence and intensity between ungrazed areas, and the ungrazed components of closed and open heath within grazed areas (which is hardly surprising since cattle largely avoid grazing those vegetation types).

The full section of the GHD report relating to this issue can be found at the following link http://www.depi.vic.gov.au/_data/assets/pdf_file/0019/251542/Attach_2_Conceptual_Model_Appendix_B_Part_2_-_Mountain_Cattlemen-Part-D.pdf

This GHD report goes directly to the issues raised by the present consultation process and should be considered as part of that process.

2. *A more recent study did produce maps of Satellite imagery and data in its report. However it could be said that this report and especially the interpretation of it by some environmental groups in the media recently is also "tricky and misleading"*
The MCAV submits that comments from these groups attempting to link either study to the Wonnangatta proposed trials in the valley grasslands should be treated with caution.

Cattle grazing does not reduce fire severity in eucalypt forests and woodlands of the Australian

Alps, GRANT J. WILLIAMSON,^{1*} BRETT P. MURPHY² AND DAVID M. J. S. BOWMAN¹

1NERP Landscapes and Policy Hub, School of Plant Science, University of Tasmania, Hobart, Tas.

Some points worth noting from this study:

“The use of herbivores as a fire management tool is receiving increasing consideration globally, but this intervention has a limited evidence-base and is controversial because of potential deleterious ecological effects. These issues are well illustrated by the political and scientific debate about the capacity of cattle grazing to reduce fire hazard in the Victorian Alps of Australia; there have been remarkably few scientific studies to illuminate this issue”.

This quote from the study acknowledges that the science is far from all done, (contrary to the claims of grazing opponents), in fact hardly any has been done. The authors go on to state:

“We accept that in a perfect world, well designed experimental studies, such as a before–after control–impact (BACI) experiment should be established that are of appropriate spatial scale and duration”.

The research trial now proposed and which cattlemen have long called for is just such a study.

Unfortunately the Williamson et al study cannot shed any further light on the link between grazing and fire because it deliberately ignored any assessment of the Alpine grasslands where fuel reduction benefits are greatest. Why do a study into fire impacts in grazed and ungrazed areas and leave out the bits where most of the grazing happens? If they had studied the grazing effects on fire extent in the grassland areas they would have found much less area burnt in grazed areas relative to ungrazed areas as can clearly be seen in the satellite images shown in the GHD report. They would have shown a contrary result to that found by the Williams et al study.

Ignoring the grasslands they concentrated instead totally on the forest and woodlands situated adjacent to the actual areas that were originally part of grazing runs up until 2005.

Cattlemen have never claimed that grazing can significantly assist fuel reduction in the forest and shrubby woodlands, but certainly grazing and the action of cattle activity does assist to some extent, if the cattle actually venture into such areas which they only do if there is sufficient grass to eat and maintain their condition. If there is insufficient grass they move on to areas where there is sufficient grass – grasslands and open grassy woodlands.

Given that cattle have not grazed the areas studied in this report for many years the published results were unsurprising and predictable.

It is worth noting that the forest and woodland areas assessed in this report have been gradually shrubbing up since the cattlemen were banned from cool burning in the autumn many years ago. (Now, fires started by lightning are quickly put out regardless of the time of year or the fact some cool fires are actually doing a good job.)

When pioneer cattlemen first moved cattle into these woodland areas they were much grassier than they are now and were maintained that way by cattlemen (using grazing and deliberate careful burning). When the Forest Commission was formed about 1920, pressure gradually came on the Cattlemen to stop burning. This pressure gradually increased until most Cattlemen were eventually

stopped by the authorities except for isolated instances where some families defied the authorities in order to correctly manage their leases. It is highly likely, and identified by Gammage, that much of this current shrub land around the edges of the Alpine grasslands was originally grass land and Aboriginal and natural fires kept the grassland in an open state.

David Packham AOM, (Honorary Senior Research Fellow, Monash University) writing in The Australian on February 10th, 2009 stated;

“The decision to ignore the threat has been encouraged by some shocking pseudo-science from a few academics who use arguments that may have a place in political discourse but should have no place in managing our environment and protecting it and us from the bushfire threat.

“The conclusion of these academics is that high intensity fires are good for the environment and that the resulting mud slides after rains are merely localized and serve to redistribute nutrients. The purpose of this failed policy is to secure uninformed city votes.

“Only a few expert retired fire managers, experienced bushies and some courageous politicians are prepared to buck the decision to lock up our bush and leave it to burn.”

Mr Packham also stated on ABC rural radio news about the same time that:

“There is a need to consider grazing as one management tool to reduce fuel. Some of the science relating to this subject has at best been careless and questionable”

*“There is no doubt that the Mountain Cattlemen have been **dudded**.”*

The Concept of National Parks

Australian environmentalists have lobbied for many years claiming that National Parks should have little or no human interference. This has led to a philosophy of gradually closing up Victorian Parks to multiple use and proactive management of the land as the environmental groups influence over Governments prevailed. This direction may be the worst thing for the land and its biological diversity. More scientific research needs to be done on this issue. A radical rethink of how the Australian bush is managed is required. It could be that future management reflects to some extent how the land was managed by the Aborigines before European settlement.

The reality of National Parks throughout the world is that there are no set “pristine” standards for National Parks as claimed by some groups. In fact, many countries promote multiple uses of their National Parks including deliberately promoting rangeland grazing for good management.

The following is a personal communication from Prof Bill Gammage historian and author of *The Biggest Estate on Earth; How the Aborigines made Australia*.

Bill Gammage: comments on the MCAV publication “The Links between Cattle Grazing and Fuel Reduction in the Grazing Zones of the High Country”. 25 December 2012, (Copy with thanks from Graeme Stoney, December 2012)

The management of Australia’s national parks is a disgrace. Trees and scrub overrun grass and open forest, fuel builds up, fires ravage, species become endangered and extinct, people die.

There are four options for managing fuel in alpine country:

1. *Do nothing*
2. *Fire*
3. *Grazing*
4. *Combine 2 and 3.*

1. Though I've not seen it tested, a common belief is that the public mostly favours doing nothing, because this preserves what is there - a "natural balance", a harmony of plants and animals (including birds, reptiles and insects) as intended by nature.

This offends on three broad grounds. First, even without people there is no such thing as a "natural balance". The term implies a static condition, as if plants and animals stand frozen in time, but all life moves in cycles, competing, collaborating, responding variably to season and circumstance. Second, for at least 50,000 years until 1788, Aborigines actively managed the land. In places they deliberately did nothing, but not forever, and in most places they did a lot – it was their life work. They shaped Australia into a kaleidoscope of plant patterns, and by controlling fuel they eliminated or greatly reduced killer fires. Wilderness came after, in country Europeans couldn't use. Third, it was never the purpose of national parks to protect a "natural balance", even if managers could say what that was. The avowed purpose of national parks is active, not passive: to protect species diversity, so passing to the future the gifts of the past. Clearly this is not happening. "Do nothing" is not a policy; it is a neglect of heritage and a dereliction of duty, endangering our plants and animals and impoverishing our future. We must intervene; we must manage.

2. To reduce fuel and to protect species, fire is the best option. The people of 1788 gave the future a great gift, which even today many newcomers can't imagine: with proper management, killer fires can be averted, the impact of lightning strikes much reduced, and patterns of plant distribution maintained so as to ensure a habitat for every plant and animal. This is a gift to prize.

Today it would be very difficult to reduce the high country to 1788 fuel levels, and then to introduce and maintain a habitat for every plant and animal. We haven't anywhere near the fire and species skills of 1788, nor are we prepared to commit the time and resources those people did. But we could do better. We could "burn and learn": commit to fuel reduction by regular preventive burns, thereby averting killer fires and giving at least some species under threat a chance to survive. In the high country some local expertise survives to assist this, and elsewhere very considerable Aboriginal expertise is at hand.

3. As its title states, the paper advocates cattle grazing to reduce fuel in the high country. This would come from grazing itself, and from the controlled fires cattlemen light to refresh grassland.

Cattle grazing is far superior to doing nothing, but far short of fire's capacity. No doubt marsupial grazing helped Aboriginal people maintain a mosaic of short grassy patches which were also fire breaks, and cattle too prefer young fresh grass which comes up after a well-timed fire.

MCAV comment on Gammage

BILL GAMMAGE 'The Biggest Estate on Earth' - How Aborigines made Australia

This 434 page book proves beyond doubt that modern management has dramatically changed the High Country for the worse, since European Settlement.

The remarkable and instructive thing Gammage has demonstrated in his historic research that what the Mountain Cattlemen have been saying about management and fuel reduction for more than fifty years is correct. It is very important that the conclusions reached by Gammage about how the land was deliberately managed by the Aborigines are urgently considered.

The Orchid - *Diuris ochroma* (pale golden moth)

This proposed grazing trial is an opportunity to conduct valuable and intense research on the orchid. We note that some work has been done in Wonnangatta in 1996 and 2004/2005. We also note that the orchid appears to have become scarcer over that time period. It is not clear from the posted report from the Arthur Rylah Institute if the proposed follow up work after 2005 was ever completed.

FIRE (ECOLOGICAL BURNING) IN NATIVE GRASSLANDS

Glen Johnson, Flora Fauna and Fisheries Coordinator, DNRE Parks Flora and Fauna Division, Wodonga

This is an extract from that paper

Common to most native grasslands is the need for “Biomass Reduction” to maintain structure (open, dominant tussock grasses with plenty of inter-tussock spaces) and maximum floristic diversity (lilies, orchids and other ‘wildflowers’).

Fire, grazing (native and or introduced herbivores) and even slashing/mowing have been successfully used to achieve this state.

MCAV Comment

One of the best and flourishing stands of the Orchid is on privately owned Catherine Station (on the Buffalo River) which is heavily grazed. As cattle grazing keeps the vegetation levels down this appears to suit the Orchid. It is worth noting that grazing ceased in Wonnangatta in 1988 and in 1996 the orchid was still in plentiful numbers. However the unanswered question is, *has the increasing vegetation at Wonnangatta resulted in a diminishing population of the orchid since grazing ceased?*

NSW SCIENTIFIC COMMITTEE

***Diuris ochroma* D.L.Jones (Orchidaceae)**

Review of Current Information in NSW - February 2008

Distribution and number of populations:

Diuris ochroma is currently known from a large population in Victoria (Coates et al. 2007) and a single population in NSW. This NSW population consists of a number of small colonies scattered over an area of approximately 4 km². Two further populations of *D. ochroma* are also known to have occurred in Kosciuszko National Park (NP) although they have not been observed for over 30 years. These records are considered reliable as they are based on vouchers in the National Parks herbarium in Kosciuszko NP. The specimens have been confirmed as belonging to *D. ochroma* (expert advice). Searches have been conducted for *D. ochroma* in both of the vouchered localities since, but failed to relocate the species (expert

advice). Given the variable flowering time of the species, however, and the tendency for only some plants to flower each season, it is quite possible that the species still exists at these poorly known localities despite the recent searches (expert advice).

MCAV Comment:

It is relevant to the current consultation process that the only stands of *D. ochroma* in NSW now missing were located in the Kosciuszko National Park. Grazing ceased in these areas more than 50 years ago.

This begs the question, are the orchid populations diminishing due to the lack of grazing and planned burning in the Park which keep the vegetation open?

Those questions and others could be answered by more research and the grazing trial work. Why is that opportunity being opposed?

The Senate enquiry

The Senate Committee report “The incidence and severity of bushfires across Australia’ August 2010 (page 80) discusses the issue and identifies both sides of the debate. It concludes on page 88 that:

“3.202 Finally, the committee notes that while grazing would not provide a comprehensive solution to fuel hazard reduction deficiencies, where appropriate it should be considered by public land management agencies as part of each regions fuel reduction strategy. The committee also supports further research in alpine country environments to establish the relative long term benefits to those areas of grazing, prescribed burning, or management without fuel reduction”

Further points in support of Alpine grazing and planned burning to reduce fuel:

Source: MCAV paper, **“The Links between Cattle Grazing and Fuel Reduction in the Grazing Zones of the High Country”** (published Feb 2010)

- *When the cattlemen first came to the High Plains after 1835, they followed on from the ancient fire practices of the Aborigines and lit cool fires in the autumn after mustering.*
- *The MCAV has never claimed that grazing prevents wildfire or reduces the incidence of fire. It rightly claims that grazing reduces fuel loads thus reducing the intensity of wildfire thus protecting the environment and snow gums especially in the higher, hot fire sensitive zones.*
- *Recent modelling (sic) within the Bushfire CRC has supported the well known facts that wildfire control is easier and safer where fuels have been reduced by prescribed burning. Obviously the area and location of burning are important, but burning a small proportion of the landscape can have a significant impact on wildfire control (King et al. 2007). There is a wealth of evidence that burning and/or grazing can prevent accumulation of fuels, and affect their arrangement and their seasonal flammability. It is a well-established principle of physical science that these factors affect fire behavior and intensity. The moderating effects of*

fuel reduction on fire behavior have been repeatedly demonstrated (e.g. Underwood et al 1985, McCaw et al. 2003,) therefore it is unproductive to continue to divert resources to research and modeling that tests these established facts. (Jurskis,2006)

- *Reducing the intensity of wildfire protects sensitive land, vegetation and native animals' destruction. The Aborigines knew this and we need to revert to their practices.*
- *There are several eminent people with scientific backgrounds who have done extensive work on the subject addressed in the consultation process. They have raised the possibility of utilizing grazing to reduce fuel loads in the High Country. These include Prof. Mark Adams, David Packham OAM and Prof. Peter Attiwill. It is noticeable that previous scientific work done by Harm Van Rees, Roger Oxley and Alan Wilson is never quoted by the opponents to alpine grazing.*
- *Ongoing research by Prof Mark Adams, Dean of Agriculture Sydney University, suggests that the model of management to provide the best fuel reduction and water yield strategies for the High Country will be a combination of low intensity burning and controlled cattle grazing.*

The Need for More Research

The MCAV has claimed for many years that not enough **independent** work has been done on the value of grazing in reducing fuel loads. The Bushfire Cooperative Research Centre and the Australasian Fire and Emergency Service Authorities Council states:

“The existing evidence about whether the combined effects of fire and grazing are effective in managing fuel loads and fire risk was scant and inconclusive.” (Bushfire Cooperative Research Centre, Issue 32 June 2009)

Prof Mark Adams released a summary of progress of some scientific work on the Victorian and Snowy (NSW) High Plains called 'High Fire'. Under the heading "Roles of prescribed fire and grazing in mitigating bushfire risk" Prof Adams states,

“We began our work with a thorough review of previous research. That review highlighted two main points: (1.) while there have been studies of grazing in the high country, there is a clear lack of research into the interaction of grazing with prescribed fire and (2) some of the research that is cited as being the 'evidence base' for major policy decisions, including decisions to remove or retain cattle grazing, could not be regarded as rigorous (i.e. well replicated at adequate scale) if judged by today's standards.” (Adams, 2009)

“It will not be a surprise to many that some preconceived and city driven perceptions of fire and grazing in the High country are poorly based. The High Fire experiments need much longer periods of time before they can provide definitive evidence. That said, the early data are encouraging insofar as they have at least raised legitimate questions about many of the assertions of the past” (Adams, 2009)

The document goes on to restate that there was a clear lack of replication of studies that are held to prove that grazing has a net deleterious environmental impact. Given Prof Adams preliminary work, it is important that Governments revisit previous decisions as regards grazing, and grazing interaction with fire and fuel management.

Conclusion

Grazing is but one of a suite of options to reduce fuel loads on public land, but one that is practical and very effective in areas where even cool fire is not the best option (given the doubtful track record and long term effect of modern management).

How grazing is implemented as a valuable management tool will be a challenge for the Government because of the philosophical opposition to grazing. The MCAV is left with no doubt the “science”, has been hijacked by small determined groups who have personal agendas to remove grazing because it does not fit with their ideologies of National Parks in Australia.

It is worth remembering many important National Parks throughout the World, including Australia, are grazed by domestic animals so the absence of grazing is not a World standard requirement for National Parks.

It is likely that the present management attitudes applying to our public land and Parks are not applicable to the unique requirements of the Australian bush, are not in the best interests of the land and need to be reviewed.

MCAV February 2014