



<http://townsville.wildlife.org.au>

29 November 2015

Agriculture and Environment Committee
Parliament House
Brisbane, Qld, 4000.

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To the Committee Chair

Re: Nature Conservation and Other Legislation Amendment Bill 2015

The Townsville Branch of Wildlife Queensland would like to make the following comments on the amendments proposed in this Bill.

The Townsville Branch has maintained an active interest in, and concern for, Queensland's National Park heritage for nearly 50 years. We strongly support the **cardinal principle** of park management, namely that such management must *"provide, to the greatest possible extent, for the permanent preservation of the area's natural condition and the protection of the area's cultural resources and values."*

We support adequate resourcing of Parks management and we actively encourage public appreciation of the conservation, scientific and aesthetic values of our National Parks through our program of field outings, many of which visit both National Parks and the previously titled Conservation Parks, which became Regional Parks under the Newman government amendments. Our Branch has a very long history of involvement with the Townsville Town Common Regional Park, being the first community group to call for its protection as long ago as the early 1970s.

There are many aspects of the proposed amendments that we view with approval and a considerable degree of relief. These include:

- Reinstatement of the "conservation of nature" as the sole purpose of the Act.
- Reinstatement of conservation parks as distinct areas established for the primary purpose of conservation, and the abolition of the regional park classification that merged conservation parks and resource reserves.
- Restoration of the classification of national park (scientific) and the management principles of these parks
- Removal of the provision that allowed for grazing of stock in national parks as a drought relief measure.
- Removal of the provision which allowed changes "consistent with government policy" to proceed without consultation

While we strongly support all the above amendments and commend the government for following through on its commitment to make these changes, we do have concerns regarding the following.

Cardinal principle of management

In 2013 we expressed our concern that the Newman government's changes diminished the cardinal principle of National Park management by including other management principles, such as the provision of recreational, educational and ecotourism opportunities, apparently on an equal footing.

In our submission of September 2013 we recognized that the provision of such opportunities is a valuable function of many National Parks, but argued that their provision (and related management) must remain *secondary* to the overriding function of the Parks - which is the conservation of nature and protection of cultural values. While the current Act refers to the cardinal principle we do not believe its primary role is identified with sufficient clarity.

The explanatory notes for the current Bill clearly set out the reasons for reinstating "conservation of nature" as the sole purpose of the Act (*Explanatory Notes*, page 3) – namely, to ensure that no other objectives confuse or take precedence over this sole purpose. These are exactly the same reasons why the management principle quoted above needs to be unequivocally defined as the overriding principle -- ie to ensure other management principles do not take precedence or confuse the principle of "permanent preservation of the area's natural condition and the protection of [its] cultural resources and values." The sole object of the Act and the cardinal principle of management must go hand in hand, supporting and strengthening each other.

We recommend that Section 17 of the Act be revised to ensure that the cardinal principal (Section 17 (1) (a)) is more clearly identified as the overriding principle of management and that all others are subordinate. For example:

17 Management principles of national parks

- (1) A national park is to be managed to provide, to the greatest possible extent, for the permanent preservation of the area's natural condition and the protection of the area's cultural resources and values. This is the cardinal principle.
- (2) Further principles, which must be consistent with the 17 (1), are:
[List the other principles here]

Commercial developments within National Parks

Section 35 (1) of the Act amended in 2013 allows the chief executive to grant or issue a lease, licence or other agreement over land within a national park for a service facility *or an ecotourism facility* (our emphasis). This provision runs counter to the cardinal principle of National Parks and, by allowing for such development, essentially accepts a form of privatisation over some areas within their boundaries. In December 2012 and June 2013 we made two submissions to the Newman government on this subject outlining the problems inherent in such a proposal – for the Parks themselves, for the public who visit and value the Parks, and for existing businesses, adjacent to National Parks, which already provide accommodation and other activities for Park visitors. National Parks are public lands and it is against the spirit that has guided their establishment and management to allow parts of them to be made available to private interests, however well intentioned or well-managed.

We recommend the words "ecotourism facility" be removed from this section of the Act.

Other classes of protected areas

Several other classes of protected areas were removed under the Newman government amendments, including Wilderness, World Heritage Management and International Agreement Areas. In our September 2013 submission we argued that, even if no such areas have as yet been declared, these tenures should be retained since they involved no administrative, management or financial burden and might well allow valuable flexibility in the future.

We recommend that these classes be reinstated.

Finally, we wish to give our support to the more detailed submission prepared by our parent body, the Wildlife Preservation Society of Queensland, which has decades of expertise in best practice management of our National Parks and other protected areas.

Thank you for the opportunity to make these comments on the proposed amendments to the Nature Conservation Act and related legislation.

With kind regards,

A black rectangular box used to redact the signature of Liz Downes.

Liz Downes
President
Wildlife Queensland- Townsville Branch Inc.