



**National Parks Association of Queensland Submission
Nature Conservation and Other Legislation Amendment
Bill 2012**

19th December 2012

The National Parks Association of Queensland (NPAQ) promotes the preservation, expansion and good management of National Parks and the wider protected area estate in Queensland. As a non-government, non-party political, membership-based organisation, NPAQ campaigns for more National Parks and protected areas across Queensland.

NPAQ plays a key role in lobbying for the preservation of existing National Parks in their natural condition, and also for the reservation of new areas identified as deserving National Park status. NPAQ has been pursuing this agenda since its inception in 1930, and has taken a leading role in, or has supported, the establishment of the majority of the current Queensland National Park estate.

The National Park and wider protected area estate is the foundation of the preservation and management of our natural environment, both now and for future generations. National Parks are for our children, our grandchildren, and for their grandchildren.

The content of this submission reflects the major components of the Bill.

1. Leases for Ecotourism Facilities in Queensland National Parks

Erosion of the Cardinal Principle

Introduced in the *Forestry Act 1959* during a period of coalition government, for over 50 years National Parks have been managed according to the **cardinal principle**:

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.

The State Government defines *natural condition* as *protection from human interference - allowing natural processes to proceed*. That is, National Parks are managed for nature first so that they are available for public appreciation and enjoyment. The cardinal principle is embodied in the Queensland Biodiversity Strategy, the Queensland Parks and Wildlife Service Master Plan (for protected areas), and underpins every action within individual National Park management plans. An activity that poses a threat to this principle - such as boutique ecotourism resorts - threatens a National Park's natural condition, and the values that have led to gazettal as a National Park in the first place.

NPAQ does not support the placement of ecotourism facilities on National Park land, and is very concerned about the long-term impact of such facilities in National Parks. This level of infrastructure reverses more than 100 years of National Park management on mainland Queensland, and erodes the role that National Parks play in our society. The Parliamentary Inquiry into the Nature Conservation and Other Legislation Amendment Bill should uphold the place and role of the cardinal principle as it applies to National Parks in Queensland, not lessen its application.

Tourism in National Parks

The proposed amendment raises questions about the appropriateness of tourism **development** in National Parks. When asked whether Victoria's National Parks should be opened to private tourism development, 81% of respondents said *No, never* (*The Age* 24/8/2012; 4,714 participants). Currently there is a complete lack of market demand for this type of experience, with a significant number of National Park-associated resorts in Queensland going into receivership this calendar year. In addition, less than one percent of the 20,000 National Parks worldwide have any significant tourism infrastructure (*Park Watch* September 2012, Victorian NPA); many of the larger US Parks are removing heavy tourism infrastructure because it directly reduces and detracts from the experience of being in a natural place. Improving the promotion of National Parks, clearly linking visitation with off-Park facilities, better transport to and from protected areas, and enhancing the National Park experience (through interpretive walks, etc.) are arguably more effective ways of improving tourism in protected areas.

Ecotourism leases confuse public access to public land with the exclusive use associated with private commercially-orientated ecotourism ventures. The introduction of such leases would appear to directly contradict the State Government's policy of making National Parks more accessible to the public. Boutique-style developments in National Parks will reduce access to Queenslanders who cannot afford such facilities.

Less than 5% of the Queensland is National Park, a very low statistic considering the progress made in virtually every other State and Territory towards expanding protected areas. They are the jewels in our conservation crown, and preserve some of the very best landscapes and natural attractions in Australia. The Queensland Government should be taking every opportunity to expand the National Park estate, if only to support **appropriate** regional tourism and public recreation.

Supporting Regional Queensland

The placement of ecotourism facilities in National Park will not support regional Queensland. That is, embracing private eco-tourism development for a small niche tourism market will be at the direct expense of not supporting the economies of regional communities that adjoin National Parks. Note that the USA uses a gateway policy that locates accommodation and related facilities in an entry or gateway community near or adjacent to a National Park.

Other Concerns

- It is unclear what the term *ecologically sustainable* means, how it will be measured, and who will be responsible for enforcing standards associated with these term.
- Equally unclear are the minimal actions that must be undertaken to meet the *primary purpose* of an ecotourism facility.
- Wherever tourist resorts have been established in National Parks (such as South Africa), they dominate visitor use of the Park and in many instances determine priorities for Park management at the expense of not addressing conservation concerns.
- Furthermore, when resort facilities move inside a National Park, the damage they can create is substantial and cumulative. The access roads alone are corridors for weeds and other introduced species, modifiers of water movement, and barriers to certain wildlife movements. Fire issues are exacerbated because of the easy access, and fire management then has to concern itself primarily with protecting the resort and its inhabitants. This will inevitably be to the detriment of the surrounding natural landscape, which would have been subject to an ecological burning regime in the absence of such a facility.

- Should the legislative amendments proceed, there has been little information to indicate whether revenue derived from eco-tourism leases will be fed directly back into National Park management.
- Neither the Bill, nor the associated Explanatory Notes, articulate the period that leases will be provided for. The term of the lease for ecotourism facilities should be clearly defined in the legislation.

2. Amendments to provide a simplified process to authorise Service Facility Infrastructure

NPAQ notes that pages five and six of the Explanatory Notes for the Bill state that:

An existing service facility (examples given include telecommunications towers, powerlines and water pipelines) is defined to mean a service facility that was in existence on the land immediately before the land was dedicated as the relevant national park tenure under the NC Act. This definition covers pre-existing cases, but will also be applicable to cases that may arise in future, for example if a new national park is dedicated on land with a service facility in place.

These amendments are straightforward assuming that:

- Authorisation is subject to assessment and is not automatic.
- Interest in land is clearly constrained to the facility in question.
- The authority is time bound.
- A realistic fee is imposed (many such facilities pay nothing at present).
- Incremental improvements are not used to circumvent the constraint on 'substantial improvements'.

3. Removal on area (10ha) and time (7yrs) limits from the occupation permit provisions in the Forestry Act

These amendments will facilitate mining operations on State Forests. Any action that contributes to the loss and degradation of State Forests, contributes to the loss of biodiversity in Queensland. Already, places such as Hallett State Forest (east of Injune) have virtually disappeared under a matrix of CSG well-heads. These areas represent potential future protected areas, and NPAQ is not aware of any thorough scientific assessment (other than survey effort completed by the Australian Rainforest Conservation Society) that articulates the conservation values of these forests.

4. Repeal of the Brisbane Forest Park Act 1977

NPAQ notes that when the *Recreation Areas Management Act 2006* was originally passed in 1988, it contained a clause to repeal the Brisbane Forest Park Act that was never acted on. NPAQ would be concerned if activities that were originally excluded in 1977, were then allowed to occur in the new D'Aguiar National Park. The opportunity for Brisbane residents to enjoy a National Park on their doorstep should not be diminished by a myriad of invasive and environmentally damaging recreational uses.

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