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**From:** Martin Taylor <mjtaylor@gmail.com>  
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**To:** Health and Community Services Committee  
**Subject:** Submission on the inquiry into the Nature Conservation and Other Legislation Amendment Bill 2012

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**Submission to the Queensland Parliament's Health and Community Services Committee inquiry into the  
*Nature Conservation and Other Legislation Amendment Bill 2012***

Dear Committee Members,

At present the power of Chief Executive of the department administering the Act to an authority over national parks is restricted to essential service facilities like communications towers, power and pipelines.

The proposed amendments in this Bill would expand this power to granting of leases for "ecotourism" facilities on National Parks.

The proposed amendment to section 35(1) of the *Nature Conservation Act 1992* represents a major change in practice to the Objects of the Act.

Notwithstanding the caveats in the Bill that such facilities would only be allowed if they further the Objects of the Act, just by allowing such facilities at any place in a national park alters its purpose.

The primary purpose of a national park *and any portion of a national park*, is to protect nature, not tourism as laid out in Sect 19. The granting of a lease amounts to a degazettal of that portion of a national park and a change in the primary purpose.

Tourism is a happy side benefit of protecting nature, but it should never become a primary purpose of a National Park nor any portion of a national park.

As one of the world's foremost experts on tourism in national parks Ralf Buckley observes:

" It is good policy for people to play where their impact causes less damage, keeping protected areas for conservation and low-impact individual recreation. The former gives the human economy its air, water, and biological resources; the latter gives the human population low-cost improvements in physical and mental health.

It's poor policy that in order to maintain budgets, parks agencies should continually increase visitor numbers. Human populations are growing, but the area of parks is not keeping pace. The area of land and water available for conservation outside protected areas is continually shrinking, so parks themselves are increasingly critical. Parks are assets for tourism, but they are not tourism assets." Buckley, R. (2009). Parks and Tourism. *PLoS Biol* 7 (6)

A number of prevalent myths that provide the underpinning for these amendments are not supported by evidence:

- "Parks need to foster private tourism developments to pay for management" In reality, developments just bring more problems and conflicts with nature protection that cost more to manage than yielded in fees to parks agencies. The biggest component by far of park management cost is visitor management. Management of other threats like weeds, pests and fire, is a relatively minor component. Research shows that the biggest driver of weed pest and fire problems is proximity to roads and urban areas. The myth that national parks are hotbeds of weeds and pests routinely trotted out in some circles is contradicted by evidence, not the least the accumulated evidence of the 2007 senate inquiry found here: [http://wopared.aph.gov.au\\_senate\\_committee\\_ecita\\_ctte\\_completed\\_inquiries\\_2004-07\\_nationalparks\\_report\\_report.pdf](http://wopared.aph.gov.au_senate_committee_ecita_ctte_completed_inquiries_2004-07_nationalparks_report_report.pdf). National parks do indeed suffer from weeds pests and excessive fire, but this Bill and the increased people pressure, vehicles and roads it promises will only worsen these problems and increase the cost of management. Research reviewed by Ralf Buckley cited above contradicts this myth.
- "Tourism facilities are needed to meet the presentation function of national parks". Presentation of national parks may be impaired by private tourism interests, not enhanced, by increasing the commercialisation of natural areas, by impairing the attractiveness, peace and quiet of those areas. A good interpretive program can more than adequately be provided by parks staff, particularly if Traditional Owners are engaged in interpreting cultural connections. These days social media offers a whole new world of opportunity for enhancing the presentation value of national parks, through guided tours on mobile phones for example. Hard infrastructure is an outdated and heavy handed approach to presentation.
- "Tourism facilities are needed to improve access". In fact the Bill's Explanatory Notes states that an ecotourism lease could potentially provide exclusive access rights to an area that may once have been

accessible by the general community as public land. Hence the Bill is likely to result in public access being curtailed, not enhanced.

- "Parks are not delivering the tourism value they could" In fact the opposite is true. The Ballantyne report found at [http://www.crctourism.com.au/wms/upload/resources/90049BallantyneValuingTourismSpendQPSUM%20\(1\).pdf](http://www.crctourism.com.au/wms/upload/resources/90049BallantyneValuingTourismSpendQPSUM%20(1).pdf) found that national parks in Queensland are associated with \$4.43 billion a year in tourist spending up to a billion of which can be attributed firmly to the parks themselves. Attribution levels are lower than elsewhere in Australia probably because Queensland has such a small parks system as a proportion of the landscape (less than 5%) and so has not yet reached the critical mass needed to provide the iconic attraction to that market segment that seeks out nature experiences. Those tourists are spending their money instead in Tasmania, NZ or South Africa because the parks systems are so much larger and such a feature of those countries. The solution is not to cram more safari lodges, troop carriers and quad bike tours in the few, small and fragmented parks we have. That will only depreciate their value as wildlife experiences by killing off the wildlife. The solution is a greatly expanded parks estate that offers the rich menu of unique nature and wildlife experiences that can rival and beat our competitors. At the moment the economic value from spending by visitors to parks far exceeds the money that Queensland puts into expanding and maintaining this vital asset. It is very narrow thinking to say that parks have to somehow pay for themselves through visitor fees and tourism leases. The reality is that parks are already paying for themselves and more by the economic value they generate for tourism, not to mention all the other uncosted ecosystem services they provide like clean air and water, genetic resources and pollination. The problem is that government's refuse to see this economic value and refuse to reinvest it back into building and maintaining the asset that produced it, like any good business would. This value is already being delivered without tourism developments in parks. Spoiling our parks with development only threatens to reduce the tourism value they are already delivering.

*This Bill threatens to actually degrade the value of Parks for tourism itself, and prevent Queensland from becoming a nature based tourism magnet*

Despite the provision in section 35(1)(c)(iii), impacts on the land's natural condition and its biodiversity values, and degradation of the values of the park is inevitable with the introduction of tourism infrastructure. This is likely to have the larger long term effect of degrading the tourism value of our park system itself as discussed. The primary purpose of any private tourism facility is return on investment and this will always come into conflict with park management imperatives, for example if the park has to close for biodiversity protection reasons during a critical breeding season of an endangered species.

No consideration has been given to the benefits to tourism from strategic growth of the area and number of national parks, one of the objects of the Act. Queensland, with less than five per cent of the State protected in national parks, compares poorly with other states. The Parks Minister recently shocked the world by proposing to convert national parks back to state forest or grazing land, turning the clock backwards on parks system growth.

However the Premier also made an election commitment to continue the acquisition of new national parks which is to be applauded.

One way the eco-tourism industry could really add genuine value to conservation is for them to get into the business of buying land to become private protected areas. Those might be appropriate locations for safari lodges or other eco-tourism venues. What is more, the Commonwealth has been offering \$2 for \$1 grants to do just that. The experience of the private game reserve industry in South Africa provides a good model for how tourism can both "give back" to conservation and build their own asset base of nature-experiences.

This Bill would prevent progressive elements of the tourism industry from pursuing this approach, by removing any incentive for tourism businesses to buy their own protected areas. Queensland does not have a reputation as a magnet for nature based tourism yet, except for the Reef, because our park system is too small and as this Bill proves, so mis-understood. This Bill threatens to ensure we never achieve that reputation.

Sincerely

Martin Taylor

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