



**Gecko**

The peak regional environment body.

19<sup>th</sup> December 2012

**Gecko - Gold Coast and Hinterland Environment Council Assn Inc**

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Sub # 59  
**RECEIVED**  
20 DEC 2012  
HEALTH AND COMMUNITY SERVICES COMMITTEE

Dear Mr Chairman,

Re: Nature Conservation and Other legislation Amendment Bill 2012.

Thank you for the opportunity to make comment on the proposed Amendments to section 35 (1) of the Nature Conservation Act and Forestry Act. Gecko- Gold Coast and Hinterland Environment Council Assoc. Inc. is a not-for-profit environment association founded in 1989 and has been active for the past 23 years in protecting the environmental values and ecological sustainability of the Gold Coast as well as across Queensland .

**Foundation legislation:**

The Nature Conservation Act (NCA) has been a foundation piece of legislation for the conservation and management of Queensland’s biodiversity and habitats since 1992 and its original cardinal principle was the conservation of nature. These amendments represent substantial change to national parks purpose and management and we have grave concerns about the impact of these changes.

**Inadequate public consultation:**

Given the extremely limited consultation on this issue at such a busy time of year and that the only driving force for the changes is a request from the self-interested tourism industry we have concerns about the rush to implement these changes which we believe are not in the best interests of national parks, biodiversity, the community or the tourism industry.

**A future vision:**

National Parks were established in Australia by visionary people who could see the long term benefit of conserving areas of exceptional biodiversity, beauty and geological/geographical interest. They are designed to provide a haven and refuge for native animals and plants which would struggle to survive outside of protected areas. Since the establishment of national parks scientific knowledge has progressed and we are now aware that all living forms are interconnected and that the loss of any of these forms has negative consequences to the unravelling of what is known as the web of life. We do not fully understand the consequences of loss of species, but we do know that a healthy natural environment is the foundation of all human activity and that it must be protected to the utmost.

The integrity of national parks is a management challenge if they are to remain viable and not only provide native species with a refuge, but also provide opportunities for human learning and thoughtful enjoyment. As well, they offer a repository of species having properties potentially beneficial to human health and wellbeing.

It is the opinion of our members that the proposed amendments to the Nature Conservation Act, enabling the construction of eco-resorts within national parks will not further the goals of conservation, maintenance of national park integrity and optimum learning/ enjoyment for Queensland residents and visitors to our State.

**Reasons to oppose the amendments:**

Our reasons for opposing the proposed amendments in regard to the construction of eco resorts in national parks are as follows:-

**Tourism industry problems:**

It should be recognised that the problems confronting the tourism industry have more to do with the high Australian dollar and the uncertain economic state of the world economy which is dissuading people from travelling long distances to visit Australia. The construction of a few eco-resorts in national parks will not even begin to fix these problems. There is no evidence in the Explanatory notes to demonstrate that there will be significant benefits to either the tourism industry or the general community.

**Environment the priority over economics for national parks:**

Economic gain is not, has never been, and should never be a driving force in the management of national parks. And yet this amendment bill proposes to allow private ecotourism facilities in national parks with the sole aim of boosting tourism, to the detriment of highly-valued environmental and cultural interests.

**Conflict of values:**

The primary aim of any business, including ecotourism businesses, is to make a profit for the investors. The primary aim of national parks is the conservation of nature. There is an inherent conflict in these two aims and the environment is highly likely to suffer if eco-resorts fail to make sufficient profits.

**Most appropriate use of national parks:**

Only 5% of Queensland is dedicated to National Parks which is already the lowest percentage in Australia (the international standard is 15% - NSW has 9%, Victoria 15% and Tasmania 40%). This limited area should be protected from commercial development and enabled to function as the refuge for native species.

Enabling ecotourism facilities within National Park lands erodes the **cardinal principle**<sup>1</sup> which seeks *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*).

The concept of most appropriate use is clearly evident in national parks with the conservation of nature as it enables the Government to fulfil its obligations to the Ecological Sustainable Development objective of "to protect biological diversity and maintain essential ecological processes

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<sup>1</sup> Introduced in the *Forestry Act 1959* during a period of **coalition government**, for over 50 years National Parks in Queensland have been managed according to the cardinal principle.

and life support systems.” Further the Government has an obligation to heed scientific warning which may still be tentative or incomplete, about the impacts that global warming will have on biodiversity.

The degradation of national parks by the construction of ecotourism buildings is not acceptable when there are better alternatives to provide public access to the parks which clearly demonstrate Government commitment to truly sustainable management of the parks. The Government must lead by example. It is preferable that ecotourism accommodation facilities are provided outside of national parks with bus transport and interpretative services into the park during daylight hours.

**Issue of democracy:**

Eco- tourism resorts within a national park are built for the use of those with sufficient money to stay there and do little to improve access to the public. Indeed it is most likely that the public will be excluded from the resorts, even though they would be built on land that the Government holds in trust for the public. This is contrary to the basic principles of democracy.

**Fairness and Equity issues:**

The resorts within park boundaries will do little to support local communities, which otherwise could benefit from them being built outside the park. This is especially true of regional Queensland areas which would prefer to have tourists staying in the towns and using town facilities. It is difficult to understand why the Government would want to give a single private entrepreneur a financial advantage over other accommodation and tourism services in regional areas.

If the intention of these amendments is to support the tourism industry it would make more sense to declare more national parks or increase the size of existing parks and fund more adequate promotion and interpretative services than simply allow a small niche market to have exclusive access to the public asset of national parks.

The current state of resorts in Queensland is not economically healthy and a number associated with national parks have gone into receivership. The granting of a few leases will not improve this situation.

Park Watch, September 2012, produced by the Victorian National Parks Association reports that less than 1% of the 20,000 national parks worldwide have any significant tourism infrastructure and that in many USA parks heavy tourism infrastructure is being removed because it detracts from the nature experience.

**Setting a precedent:**

The granting of 30 year leases with options for another 30 years is the thin edge of the wedge and sets a dangerous precedent. It is difficult to understand why the current Government is travelling down this path when previous conservative governments have not found this necessary.

The explanatory notes and comments about the type of facilities which could be permitted in the parks do not fill us with confidence that they will be low key. Mr Cook’s comments *“the trick is not to unduly fetter the entrepreneurial enterprises as it were; to allow some flexibility around the design and operation”*, adding that *“We have been careful not to put too many parameters around it”* is alarming and demonstrates the lack of adequate consideration by all stakeholders of these proposed changes. It is highly likely that the general public that visit the national parks have no idea that these changes are occurring and thus have no say in this process.



Once private enterprise has a foothold in our tiny national park estate there will be pressure for further concessions. These may be an increase in size of the resort because profits are insufficient, or an extension to the lease after 60 years or reduced limits on activities permitted at the resorts. All possible concessions will further erode the primary purpose of national parks and further endanger our rare and threatened species.

#### **Alternatives to benefit the tourism industry:**

If the intention of these amendments is to support the tourism industry surely it would make more sense to declare more national parks or increase the size of existing parks and fund more adequate promotion and interpretative services than simply allow a small niche market to have exclusive access to the public asset of national parks which represent a tiny proportion of land in this state as we have already indicated. "The development of tourism infrastructure adjacent to the base of Uluru that began in the 1950s soon produced adverse environmental impacts. It was decided in the early 1970s to remove all accommodation related tourist facilities and re-establish them outside the Park." ([http://en.wikipedia.org/wiki/Ulu%E1%B9%9Fu-Kata\\_Tju%E1%B9%Afa\\_National\\_Park](http://en.wikipedia.org/wiki/Ulu%E1%B9%9Fu-Kata_Tju%E1%B9%Afa_National_Park))

#### **Negative Impacts:**

Resorts introduced within national parks will bring the following impacts which threaten the viability of native fauna and flora:-

- noise from people and their vehicles in the park 24 hours per day , 365 days per week;
- lights at night disturbing our mainly nocturnal fauna;
- destruction of habitat to build the resort as well as providing sufficient clearing for fire safety, its access and infrastructure;
- introduction of weeds and pathogens on vehicles;
- increased garbage;
- need for increased sewage disposal, water, electricity or other power source;
- Site hardening and litter.

All of these factors negatively impact on fauna ability to find food, shelter and reproduce. This is confirmed by studies of the impacts of tourism on the Kosciusko national park. The study "Environmental Impacts of Tourism on the Australian Alps Protected Areas by Katherine Marina Pickering, Janice Harrington and Graeme Worboys in *Mountain Research and Development Vol 23 No 3 August 2003: 247-254* stated " Winter and summer tourism and recreation activities can have negative environmental impacts, such as trampling of vegetation, introduction and spread of weeds, littering, and nutrient enrichment of soils and water (Good 1992; Good and Grenier 1994; Buckley et al 2000; Pickering et al 2001; Eagles et al 2002; Newsome et al 2002)." The study also notes the negative impact of feral animals, especially rats and foxes, on native wildlife as the feral species are attracted by the waste food of the resorts.

The proposed amendments also fail to recognise existing threats to the integrity of national parks and will do nothing to alleviate these and indeed will exacerbate them.

#### **National Parks are not locked up:**

National parks are already heavily visited by the public and there is no validity in the oft repeated mantra that national parks are locked away from the public. National parks are the final repository for species who already must cope with feral animals and weeds, fragmentation of habitat outside the conservation reserves, poor fire regimes, large infrastructure traversing the parks causing divides and the predicted impacts of climate change. National parks are not the sole answer to these issues, but they need to be part of a suite of measures to protect our unique biodiversity. None of these issues are mentioned and no solutions considered, yet all are far more important than the wants of a tourism industry to have additional access to pristine natural areas.

**Expert Opinions:**

Peter Prineas, OAM, key note speaker at the 6<sup>th</sup> National Wilderness Conference in Sydney in September 2012 stated that a "gateway policy has been in effect for many years in the USA. This policy favours the locations of park visitor accommodation and many other facilities in a gateway community on the national park approaches, rather than within the park." Mr Prineas, a foremost Australian author, was awarded his Order of Australia for "service to conservation and the environment through executive and advocacy roles".

Mr Prineas cited Professor Ralph Buckley, Director of the International Centre for Ecotourism research at Griffith University, in addressing a public meeting in 2010 observed that national park concession holders... do not meet all the costs they generate. The visitation to Natural Arch in Springbrook National Park is a case in point. Tourism operators taking large numbers of tourists to this tiny section of the Springbrook National Park do not cover the costs of ranger supervision and constant site- hardening, nor do most provide a quality interpretative service. Professor Buckley continued saying that private development in national parks "just does not work" and warned against national parks ( therefore the Government) giving away the profitable part of their business to private interests. He believes that intensive tourism development of national parks magnifies costs and the cheapest management option is wilderness.

**Lack of information provided:**

There is no information provided about how any revenue from these resorts will be used for the benefits of national park management rather than ending up in consolidated revenue. Will the money supposedly generated go to paying for the increased management costs or the purchase of additional areas for national park status? Would foreign interests or corporations with a majority of overseas shareholders be allowed to obtain leases? What will be the process if a resort fails to be financially viable?

**Town planning issues:**

It is also noted that there is no information on the town planning requirements for these resorts. What legislation would be applicable to such a development and which Government department will have the final say? Would such proposals would be subject to formal Environmental Impact Assessment; provide for third party rights of appeal; and require performance and rehabilitation bonds for proponents as a minimum? The amendments do appear to be rushed and given the major impacts these amendments will have we urge caution and adherence to the precautionary principle. We also ask that the Government consider the principle of intergenerational equity and protect our national parks intact for future generations to enjoy.

We urge the Government to reconsider these amendments and provide alternative opportunities to assist the tourism industry which are not at the expense of the national park estate and Queensland native flora and fauna or result in the privatisation of public assets.

**Amendments to the Forestry Act 1959.**

Gecko members are opposed to the amendments to the Forestry Act which will permit infrastructure development, including coal seam gas exploration and exploitation in State forest areas greater than 10 ha and over periods of greater than 7 years. While the current permit system may be complex and overly bureaucratic this can be solved by amending the Forestry Act to prohibit

the mining of State forests in recognition of their importance as conservation areas and for some potential as future national parks. Coal seam gas mining is being given precedence over all other forms of production throughout the State, with a few exceptions, without sufficient consideration of the short and long term consequences on the health of residents and natural environment through clearing of habitat, pollution of waterways and artesian water systems, unresolved issues of disposal of saline water and salt extracted. State forests have many intrinsic values which deserve better protection than these amendments propose.

**Please recommend against proceeding with these amendments:**

We look forward to a reconsideration of the proposed amendments to the Nature Conservation Act and Forestry Act and in-depth research into the negative impacts and costs of private enterprise in national parks.

We also strongly urge greater community consultation throughout the State. There is no need for these proposed changes to be rushed. Queensland national parks belong to the public and while the Government holds them in trust, the community deserves the opportunity to be fully consulted on these unique and priceless assets.

Yours sincerely



Lois Levy OAM  
President.

