



CAPRICORN CONSERVATION COUNCIL

A voice for the environment

19 December 2012

Health and Community Services Committee
Parliament House
George Street
Brisbane Qld 4000

email: hpsc@parliament.qld.gov.au

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HEALTH AND COMMUNITY
SERVICES COMMITTEE

Nature Conservation and Other Legislation Amendment Bill 2012

Dear Committee Secretary

Capricorn Conservation Council (CCC), since 1973, has been the principal non-government organisation in Central Queensland covering environmental issues in the Fitzroy Basin, as well as coastal and marine areas from Baffle Creek to St Lawrence.

CCC opposes the Nature Conservation and Other Legislation Amendment Bill 2012 (NCOLA) as its stated objectives, to:

- *enable authorisation of privately operated ecotourism facilities*
- *provide a simplified process to authorise 'service facility' infrastructure*

are in direct conflict to the **cardinal principal for creating and managing National Parks**. National Parks are created to provide for the permanent preservation of an area's natural condition and the protection of cultural resources and values.

Queensland had been slowly catching up to the rest of Australia with National Park funding and the amount of land protected. Queensland National Parks cover less than 5% of the State, and with a total protected area of 6.65%, Queensland lags significantly behind national averages of 8.6% National Park and 12.8% total protected tenures.

For this reason CCC also opposes the NCOLA objective:

- *removing State Forests permit to occupy maximum term and area limits*

as the capacity of State Forests to connect regional ecosystems and provide diverse habitats as well as potentially sustainable timber harvest will be diminished by over-commercialisation of currently-permitted recreational use.

Biodiversity, natural areas and threatened plant and animal communities would be at great risk if inappropriate or excessive human activity and associated infrastructure were allowed in National Parks. National Parks represent the only land tenure in Queensland that ensures permanent protection of ecosystems and ecosystem services, and are essential for ensuring there is natural resilience and capacity for species to adapt to the unknown effects of greater climate variability.

The definition of Nature as stated in the current Queensland Nature Conservation Act 1992 includes:

- *ecosystems and their constituent parts*
- *all natural and physical resources*
- *natural dynamic processes; and*
- *the characteristics of places, however small or large that contribute to their biological diversity and integrity; or their intrinsic or scientific value.*

The management of National Parks has developed around these principles for over 100 years. The objects of the NCOLA 2012 Bill are entirely contradictory to the current aims of the NC Act.

CCC has, with many other groups, strived to secure permanent protection of areas critical to these objectives. The following examples are just a few key CQ National Parks which were declared for their outstanding natural values and which have become significant drawcards for locals and tourists. This situation is replicated across most natural areas of Queensland which would not support significant increases in visitor numbers or viable 'eco-tourism' facilities:

Blackdown Tableland NP was declared to protect its unique and endemic flora from unsustainable timber harvest, below marginal grazing, uncontrolled vehicle tracks and camping. The fragile soils and spring fed streams of Blackdown plateau are already under stress from increased camping and visitor numbers. The lengthy drought followed by a couple of years of record rainfall has caused significant damage from uncontrollable wildfires and loss of vegetation and habitat. The NP has been closed frequently as a result of these factors. Blackdown has much improved road access to the camping area and lookouts and also has a ring road suitable for 4WD vehicles. The number of permitted camp sites, toilet facilities, walking tracks to special places of interest is already at a maximum capacity for overnight and day trippers, the latter having increased greatly since the expansion of the local coal mining towns. CCC considers that Blackdown Tableland NP operates at near its human carrying capacity and that increasing use would diminish the natural environment. If an 'eco-tourism' operator considers they have an ecologically sustainable and economically viable proposal, there are large rural properties areas on the NP boundary which could provide a base for facilities such as farm stay B&B, base camps and cabins for guided walks or low impact 4WD tours.

Mount Archer NP provides Rockhampton with an outstanding easily accessible green-space backdrop, as well as functioning as a substantial ecological haven and wildlife corridor. The NP declaration excluded the housing estate, Council parkland and communication infrastructure area but protected much of the upper catchments of the streams which form effective urban nature corridors. Encroachment of the urban area has resulted in an increased fire hazard. Attempts to operate commercial ventures, such as a coffee shop and mini bus tours to the picnic areas, walking tracks and lookouts have failed or are marginal at best. The steep slopes of the Berserker Range could not support any form of 'ecotourism' lodge or other facility, other than as a drop off point for guided bushwalks and nature rambles.

Mt Etna NP was declared after the closure of the economically marginal limestone mining operation which is still undergoing a lengthy rehabilitation process. The mine destroyed much of the vine scrub (semi-evergreen vine thicket), many very significant caves and would have eliminated the largest maternity site for the Little Bent-wing Bat *Miniopterus australis*. Mt Etna and the adjacent Limestone Ridge would not support a viable 'ecotourism' operation due to the rugged karst limestone topography, challenging cave climbs and the thick remnant vine scrub. At best a local B&B outside the NP might promote adventure tourism and limited access to QPWS-supervised Bat Cleft tours during the short breeding season.

Byfield NP has presented many management challenges for QPWS, Hancock Queensland (formerly Forest Plantations Qld), Defence (Shoalwater Bay Training Area), Queensland Police Service and local government. Destruction of tracks, dunes, beaches and heathland vegetation by increasing illegal and dangerous 4WD use has been an on-going difficulty. Road access (4WD, trail bikes only) through coastal forest, paperbark & banksia heaths and wetlands, crosses the ecologically sensitive catchment of Waterpark Creek, traverses the fragile dunes and provides access (legal and illegal) for beach driving. Despite a history of disputes between visitors, Stockyard Point residents and conservation interests, there have been good cooperative efforts for activities such as dune revegetation and marine debris clean-ups. The clearly stated preference for all users has been for minimal infrastructure, bush camping and basic road access. The current level of usage, particularly during peak times, is already causing environmental damage and increased risk of vehicle accidents. Given these factors, it is difficult to perceive of any viable 'ecotourism' lodge other than the businesses which operate outside the NP from nearby Byfield or from Yeppoon.

The smaller National Parks in CQ, including the coastal islands, could not conceivably support significant 'ecotourism' facilities, though possibly low impact sailing and kayak expeditions could be supported. Some Queensland National Parks, e.g. **Carnarvon Gorge NP, Border Ranges NP** already have barely-viable tourism facilities outside the park and this should remain the model for promoting and accessing our State's great natural features. These examples are provided to give tangible evidence for the case that the prime reason for existence of the Nature Conservation Act would be severely diminished if the NCOLA 2012 Bill is passed into law.

'Ecotourism' is ill-defined in the Bill and Explanatory Notes and could mean anything from simple promotion of Queensland's natural features, low impact nature and camping tours, right through to cabins, lodges, resorts, chair lifts and any amount of road, power and water infrastructure. Partnership agreements between the Government, tourism operators and peak bodies would exclude any reasonable local and public input about loss of amenity for non-paying visitors, or effective scientific scrutiny of the ecological impacts. The loss of significant resources from National Park's policy and interpretive areas is unlikely to be resourced and replaced by fees and levies from tourism entities facing great financial risk with any ventures approved in National Parks. This is especially so with current and uncertain economic conditions, severe weather, variable seasonal and probable climatic events.

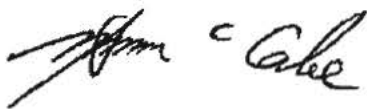
The proposed changes to the Forestry Act would permit even greater acceleration of the dissection of our natural landscape and stream catchments with pipeline and power corridors. CCC constantly expresses our frustration that there is no effective implementation of environmental offsets policies and conditions for the major and significant projects such as coal mines, CSG wells and pipelines, port and dam projects. We engage as much as physically possible with government at all levels, and industry; for example, through membership of CQ Mine Rehabilitation Group and EIS negotiations with corporations, to protect habitats, ecological connectivity and conversion of environmental buffers or precincts to National Park or Conservation Park status. The rate of expansion of industry and urban areas is exceeding the capacity of the offsets strategies without permitting even more destruction of native forests.

A detailed study needs to occur into Queensland's remaining and salvageable nature corridors before any further ecological connectivity is lost in our already greatly reduced native forests. The amendments to the Forestry Act should be rejected.

Time does not permit a thorough analysis of 'eco-tourism' and viability and ecological impacts globally (example below)¹ but the NCOLA 2012 Bill and explanatory notes provides little supporting evidence that this proposed major change to the intent and operation of the Nature Conservation and other Acts will bring any financial benefits to Queensland, or avoid the ecological damage potentially relegating our already threatened, greatly diminished and inadequate amount of natural estate.

CCC supports opportunities to improve human enjoyment and interaction with the nature. We would welcome the opportunity to present additional information at public hearings in early 2013, especially on practical matters for the National Parks, forested Resource Reserves, and other protected areas in Central Queensland.

Yours sincerely,



Michael McCabe
Coordinator

¹ Sample literature review

<http://neapro.oxfordjournals.org/content/21/1/45.full> *Economics of Protected areas*, Dixon, J.A., Sherman, P.B., <http://www.jstor.org/discover/10.2307/4313779?uid=3737536&uid=2&uid=4&sid=21101455122033> *Ambio* © 1991 Royal Swedish Academy of Sciences

Abstract:

Although there is widespread agreement on the importance of maintaining natural areas and their associated flora and fauna, the total amount of area given protected status is frequently less than desirable, and the level of funding provided for management is almost always inadequate to do the job. A major reason for this is that the benefits to society from protected areas are often grossly underestimated, and the immediate costs of protection appear large in comparison. As a result of this "market failure," government investment in protection is usually required. Economics can play a key role in understanding why benefits are underestimated and how benefit estimation can be improved. This information can, in turn, be used to justify increasing the extent of publicly supported protected areas and providing larger budgets for management. The major benefits and costs associated with protected areas are identified, and examples of quantitative and qualitative analysis of these factors in protected areas in Asia, Africa and Latin America are discussed.