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HEALTH AND COMMUNITY
SERVICES COMMITTEE

19th December 2012

Mr Peter Dowling MP
Chair
Health and Community Services Committee
Parliament House
George St, Brisbane
hcsc@parliament.qld.gov.au

Dear Mr Chairman,

Re: Nature Conservation and Other legislation Amendment Bill 2012.

Thank you for the chance to comment on the proposed Amendments to the Nature Conservation Act and Forestry Act. We are very disturbed that your Government, that is charged with the protection and management of Queensland's rich biodiversity and habitats is proposing changes to what has been a fundamentally important piece of legislation. The Nature Conservation Act is the only law that goes anywhere near ensuring the conservation of nature in this state. To weaken it will mean a loss to future generations and an impoverishment of this state's economy and environment.

It is clear that some people do not understand the purpose of National Parks, that they were established by people of extraordinary vision not on a strange irrational whim, but because there was and is long term benefit in conserving areas of exceptional biodiversity, beauty and geological/geographical interest. In providing a haven and refuge for native animals and plants National Parks ensure the survival of species which would struggle to survive outside of protected areas. Although science has shown the importance of protecting native fauna and flora, we have yet to fully comprehend the consequences of destruction of species. However it is becoming evident that unless we do so it is "curtains" for a sustainable economy. A healthy natural environment is the basis for all healthy and productive human activity so it must be protected to the utmost.

The proposed amendments which will enable the introduction of eco-resorts within National Parks seems to us to conflict directly with the goals of conservation, the maintenance of national park integrity and optimum learning/ enjoyment for Queenslanders and visitors to our State.

1. Economic gain should never be a driving force in the management of national parks. Yes they cost money to maintain, but there are other ways to raise this money than hand over access to the publicly owned estate to private enterprise. The profit motive has never been found to protect complex biodiverse systems because possibly a successful regulatory scheme has yet to be found that commerce would accept - or maybe it is impossible, an anathema. Would we put a few foxes in the hen house and expect all to survive?

2. This amendment bill seems to be driven by the sole aim of boosting tourism. Someone has decided boosting tourism equates to getting access to National Parks to install a few "eco-resorts" without regard for the detrimental impacts on highly-valued

environmental and cultural interests and is successfully lobbying this Government to give them concessions. If it were not so serious, it would be laughable.

3. The tourism industry is a victim of the global financial downturn and the high Australian dollar. Some "eco-resorts" in National Parks are not going to help. If they were to help there would evidence in the Explanatory notes demonstrating the significant benefits to either the tourism industry and the general community.

What these proposals fail to take into account are the following important factors:-

- 1. A mere 5% of Queensland (one of the largest states in Australia) is dedicated to National Parks and the preservation of our native fauna, flora and dwindling habitat. This is the lowest percentage in Australia (with the international standard being 15% - our smallest states -Victoria with 15% and Tasmania 40% and NSW with 9%), Queensland is way behind. It is insanity not to protect this limited area from commercial development and leave it to function as the primary refuge for native species.*
- 2. Permitting ecotourism facilities whether resorts or otherwise, inside National Park lands undermines the **cardinal principle**¹ "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). If we abandon that, then what is left?*
- 3. If the conservation of nature in national parks is not a clear example of the concept of most appropriate use because it enables the Government to fulfil its obligations to the Ecological Sustainable Development objective "to protect biological diversity and maintain essential ecological processes and life support systems", what other activities could there possibly be?*
- 4. The Government also has an obligation to heed scientific warning which may still be tentative or incomplete, though there is little doubt about the scientific findings of loss of biodiversity and the impacts that global warming will have on biodiversity with its impacts for continued sustainable human habitation.*
- 5. The degradation and sacrifice of national parks to the outmoded economic imperative of "extract and exploit all resources" is not acceptable. There are better alternatives of providing public access to national parks which will clearly demonstrate Government commitment to truly sustainable management of the parks. It is up to the Government to lead by example. The sustainable option is that ecotourism accommodation facilities be provided outside of national parks with bus transport and interpretative services into the park during daylight hours.*

¹ 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.

6. *There is a socio-economic inequity issue in providing private commercial interests access to national parks. "Eco-resorts" are generally built for the use of those with sufficient money to stay there and tend to restrict access for the public, even though the facilities would be built on land that the Government holds in trust for the public. This is contrary to the basic principles of democracy.*
7. *It has been shown that resorts within park boundaries do little to support local communities, which would otherwise derive more benefit if the facilities were built outside the park. Regional Queensland areas especially would prefer to have tourists staying in the towns and using town facilities. One questions if the the Government has truly given consideration to why it would give a single private entrepreneur a financial advantage over other accommodation and tourism services in regional areas.*
8. *One only has to look to see that 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.*
9. *According to Park Watch, September 2012, produced by the Victorian National Parks Association it seems 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.*
10. *The granting of 30 year leases with options for another 30 years is the thin edge of the wedge and sets a dangerous precedent. Once private enterprise has a foothold in our tiny national park estate there will inevitably be pressure for further concessions. This is not a sustainable situation. All possible concessions will further undermine the primary purpose of national parks and further endanger our rare and threatened species.*
11. *If the intention of these amendments is to support the tourism industry it is scraping the bottom of the barrel. These are not visionary ideas, which would include expanding the national park estate to protect what is really precious.*
12. *These proposed amendments totally overlook the known 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 on vehicles; increased garbage;*
 - *need for increased sewage disposal, water, electricity or other power source;*
 - *site hardening;*
 - *litter.*

13. *The proposals fail to recognise existing threats to National Parks and will do nothing to alleviate these.*

- *National parks are already heavily visited by the public. They are not locked away from the public as some uninformed pretend.*
- *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 such as power lines traversing the parks causing divides*
- *and the predicted impacts of climate change.*

While National parks are not the sole answer to these issues, they need to be part of a suite of measures to protect our unique biodiversity. No attention is given to these issues and no solutions considered, yet all are far more important in the long term than the short-term problems of a tourism industry seeking to be relevant and have special access to pristine natural areas.

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...(and) ..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.

We have further problems with these proposed amendments:

1. *They do not provide information as to how any revenue from these resorts will be used for the benefit 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? What happens if the resort fails to be financially viable.*
2. *One can see a scenario arising whereby foreign interests or corporations with a majority of overseas shareholders would be allowed to obtain leases or local mining magnates be given special concessions and then amazingly mining exploration permits applied for and given. Nowhere is there any guarantee that this will not occur.*
3. *What would be the town planning requirements for these resorts?*
4. *What legislation would be applicable to such a development?*
5. *Would such proposals would be subject to formal Environmental Impact Assessment; provide for third party rights of appeal;*
6. *and require performance and rehabilitation bonds for proponents as a minimum.*

In summary we feel that the amendments do not appear to have given thorough consideration to the major impacts they will have. Caution and adherence to the precautionary principle is what is needed here.

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.

Amendments to the Forestry Act 1959.

We also 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.

We are really concerned that coal seam gas mining is being given precedence over all other forms of production throughout the State, with a few exceptions, with insufficient 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.

We urge the Government to reconsider the proposed amendments to the Nature Conservation Act and Forestry Act and undertake and examine the in-depth research into the negative impacts and costs of private enterprise in national parks.

It is clear that 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 the eco-resort fails to make sufficient profits.

Yours faithfully,

J. Bridle & J. Owens.

*Tugun, 4224.
19 December 2012.*