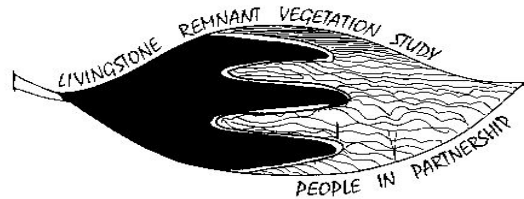


REM VEG



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To
The Chairman,
Health and Community Services,
Parliament House
George Street, Brisbane QLD 4000
hcsc@parliament.qld.gov.au

Submissions to the Nature Conservation and other legislation Bill No 2 2013

Dear Sir,

We wish to register objection to the Nature Conservation and other legislation Bill No 2 2013 as this legislation will negate the cardinal principles governing National Parks.

The proposed amendment to the Object of the Act in Section 4 completely changes the purpose of the Act; no longer will it be primarily concerned with the conservation of nature as is presently the case. It has been shown in the past that once social, cultural and commercial use of protected areas are added as an object, the primary needs of environment are almost always relegated to last rather than primary place

The proposed abolition of 8 classes of protected area is a step too far with minimal gain and some potentially substantial losses. It is fair comment that no areas had been declared as wilderness areas, World Heritage management areas and international agreement areas. So nothing changes by abolishing them. However, nothing is gained either. WHMAs and IGAs could have a place in the future and, in fact, were considered for declaration in the past. Why remove that flexibility when its presence has absolutely no effect, financially or in terms of so-called green tape, on the, on the management of protected areas?

Statements have been made that the amendments leave the cardinal principle for national park management untouched. By changing the Object, the cardinal principle has potentially lost much of its legal strength. It has been the foundation for the protection, to the greatest possible extent, of the natural and cultural resources on national parks. It relied on the Object for its mandate.

This legislation is clearly an attack on national parks, because the three proposed additions only refer to protected areas, when the Act also contains provisions relating to the conservation of wildlife outside protected areas. The proposed changes have no place in the Object. The additions are all presently encompassed by the management principles for each class of protected area, where certain uses are qualified in terms of the extent to which they can apply. By placing them in the Object in such a broad and unqualified manner changes the whole basis of the Act.

Conservation parks and resources reserves have been abolished and rolled into a new class of protected area known as regional parks. This name has no purpose as it carries no implication of resource protection. When you combine two classes of protected area in a hierarchy, the resulting management principles tend to shift towards the lowest common denominator. That has happened with regional parks.

The loss of national park (scientific) and national park (recovery) does need to be reconsidered. The loss of these two classes of protected area achieves virtually nothing other than saving a few lines in the legislation. Rolling them both up and stuffing them into the national park class is a travesty and substantially undermines the level of protection that is afforded to national parks.

National parks (scientific) satisfies the IUCN category of protected area generally known as a nature reserve (the term used in NSW). These areas involve strict protection and management for a particular conservation purpose. Public access is strongly controlled. This class of national park is used for parks that protect, inter alia, bridled nailtail wallabies (Taunton) and northern hairy-nosed wombats (Epping Forest). They sometimes require strong manipulation of the environment (including other native species) in order to ensure the survival of an endangered species. To simply absorb them into national parks and provide for a special management area (scientific) is unacceptable and unnecessary.

Similarly, national park (recovery), which was designed to allow for restoration of land that was destined to become national park, has been absorbed into national parks. This also makes a mockery of national parks status as the restoration requirements

could take many years to achieve. Once again, there is little to be gained and much to be lost by abolishing this class of protected area. A special management area (controlled action) has been created to cater for a national park on which this work is being carried out. National park (recovery) should be retained.

The slow rate of production of management plans for protected areas was identified in an audit of the NC Act some three years ago as a major departmental failing. Action has been taken in the amendments to abolish the requirement for each park, or aggregation of parks, to have a management plan. That has been replaced with a requirement to prepare a management statement. The capacity to prepare a management plan is still available, though there is no compulsion and probably very little incentive.

It could be argued that any park that was subject to activities that are contrary to the cardinal principle, such as tourist resort development and grazing, should have a management plan developed before such an activity could be authorised. That would ensure that the key values of the park had been clearly assessed and expressed.

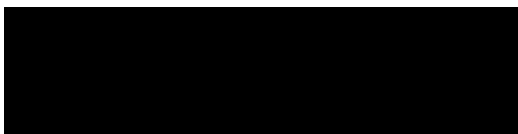
Management plans are required to go through a public consultation process. That process previously had two consultation steps, but has now been reduced to one. Management statements involve no consultation with the public prior to coming into force.

It is important that some public feedback be facilitated.

If that does not happen, then it's difficult to know what value the management statement actually has. It would be appropriate that management statements be subject to a single public consultation process.

In the present climate of financial and political expediency it is of primary importance that protection of habitat with its flora and fauna are given more not less protection.

Yours sincerely

A large black rectangular redaction box covering the signature area.

Christine E Fraser
Livingstone Remnant Vegetation Study Group