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To  
The Chairman,  
Health and Community Services,  
Parliament House  
George Street, Brisbane QLD 4000  
[hpsc@parliament.qld.gov.au](mailto:hpsc@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

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

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.

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.

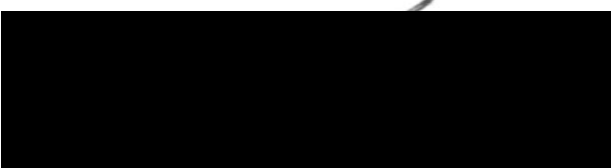
Forest reserve has been abolished as a tenure. It was established to act as a holding tenure in the SEQ Forest Agreement process. Many State forests that were being transferred to national park status contained a number of encumbrances (e.g. grazing, occupation licences etc) that had to be determined and negotiated before the land could be dedicated as national park. It has been an extremely useful holding tenure and there would appear to be no strong reason why it should no longer be available. Why wipe out that flexibility when it has served a very useful purpose in the past?

The demise of forest reserve status would seem to reflect the government's desire not to transfer any State forests to protected area. In fact there seems to be a move to return many forest reserves to State forest status. It is appropriate to argue that forest reserve tenure should be retained. As with other abolitions, there is nothing gained by its loss, but future opportunities have been lost if it no longer exists.

All in all It is extremely disappointing that Australia, a wealthy country , but one with one of the worst records of species extinction in the last two hundred years now has governments that puts economic values ahead of preservation of our irreplaceable habitats and environment.

Throwing away whole environments for short term gain is very short sighted and it is time that all governments learn to think and plan ahead for 50 not 5 years. Once many aesthetic values and habitats are lost they cannot be replaced.

Yours sincerely



George Ronald Leslie Fraser



Christine Elizabeth Fraser