

**From:** [Stuart Olver](#)  
**To:** [Health and Community Services Committee](#)  
**Subject:** Nature Conservation and Other Legislation Amendment Bill (No. 2) 2013  
**Date:** Wednesday, 11 September 2013 2:32:35 PM

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Submission regarding the proposed amendments to the above Act:

I understand what these proposed amendments are trying to achieve in providing for a more efficient and streamlined management of Queensland's protected areas, and broadly support these efforts. However, I am most anxious that the cardinal principle of Nature Conservation in National Parks and other protected areas not be watered down in any way. The whole point of a National Park is to preserve nature, and human access is a privilege (and I might even add "right"), but on Nature's terms, not our own (and not at any cost).

- The proposed amendment to the Object of the Act in Section 4 could change the purpose of the Act. No longer will it be primarily concerned with the conservation of nature, as is presently the case, but it will now have social, cultural and commercial use of protected areas as an object. By changing the Object, the cardinal principle could potentially lose much of its legal strength. National Parks could be severely affected, 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 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.
- The proposed abolition of 8 classes of protected area brings little benefit. 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 management of protected areas?
- The loss of national park (scientific) and national park (recovery) achieves little other than saving a few lines in the legislation. Rolling them both up and stuffing them into the national park class 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. 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.

Many activities that were legitimately carried out on national parks (scientific) and national parks (recovery) would be in breach of the cardinal principle. Consequently,

the proposed action makes an absolute mockery of the cardinal principle and of national park status.

- 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.

Yours sincerely,

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(A member of the National Parks Association of Queensland)