

**From:** [Paul Sutton](#)  
**To:** [Health and Community Services Committee](#)  
**Subject:** Nature Conservation and other legislation Bill No 2 2013  
**Date:** Thursday, 12 September 2013 2:16:04 PM

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The Chairman,  
Health and Community Services,  
Parliament House  
George Street, Brisbane QLD 4000

Dear Sir

I write with considerable concern about the proposed changes to the Nature Conservation Act. In particular, I am very concerned with the proposed changes to the Object of the Act in Section 4 which completely changes the purpose of the Act from the conservation of nature to social, cultural and commercial use of protected areas. For me, the Nature Conservation Act ensures we will pass on to our children and their children a small but incredibly important part of our natural heritage in as untouched a form as possible. For this generation to be so greedy as to wish to exploit 100% of our natural estate for our own purposes is beyond belief. The current small National Park Estate of 4.8% of Queensland faces enough threats from fragmentation, weed and feral animal problems, climate change and other pressures without this new and unnecessary threat of change of purpose.

*We do not inherit the earth from our ancestors, we borrow it from our children.* (Moses Henry Cass, Australian Minister for the Environment in a speech in Paris 1974)

While I have seen claims that the Cardinal Principle of National Park management remains in place, the change to the Object undermines the legal strength of this principle and changes the whole basis of the Act.

The proposed new protected area to be called Regional Park, also concerns me. These appear to contain areas previously known as Conversation Parks and Resources Reserves. While I would be pleased to see Resource Reserves given greater protection, the name Regional Park suggests the protection for Conservation Parks will be reduced rather than that for Resource Reserves increased. If the combining of two very different land purposes is to be made, there should be no lowering of the protection afforded and the name should reflect this eg Regional Conservation Park and management practices should be consistent with the higher level of protection currently afforded to Conservation Parks.

The proposed loss of the National Park Scientific and National Park Recovery is important and of concern. The former is essential to provide untouched habitat for baseline research that allows most other research to be put into context. It is not sufficient to use historical data for baseline information as climatic conditions continue to change the baseline. NP Scientific parks can respond to these changes with minimal other impact allowing the establishment of new baselines despite the small amount of NP allocated to this class, NP Recovery will become increasingly important as climate change forces changes in fragmented regional ecosystems which, prior to industrial occupation, would have allowed ecosystems to evolve but now run into human changes to the landscape that limit capacity to evolve. If we are to hand at least 5% of our natural environment to our children in good condition, a recovery option will be essential for many of our National Parks.

The use of National Park Scientific to try to save endangered species such as the Bridled Nailtail Wallaby at Taunton and the Northern Hairy Nose Wombat (Epping Forest) demonstrate the unique importance of this class of National Park. Later this month, I am volunteering to assist in the capture-recapture wallaby survey at Taunton demonstrating the importance I place on the separate management plans needed for such Parks.

It is essential that the class and purpose of National Parks Scientific and Recovery be preserved.

As I write this, the early Spring temperatures in Qld are likely to reach 40 degrees and the bushfire season has already started in NSW in yet another demonstration of the increase in frequency and severity of climatic events. Already we have already passed 400ppm of carbon dioxide mark in the atmosphere and the proposed abolition of the carbon tax says we are going to do even less about carbon pollution now that the already inadequate effort made previously. The impacts on our protected estate are potentially catastrophic as ecosystems now protected in higher country attempt to retreat to higher ground that does not exist. Places such as Main Range NP where I recently took my 2yr old granddaughter camping at Spicers Gap are

very likely to be greatly changed by the time she takes her children there. With that sort of pressure in the future, we cannot justify adding additional pressure for our own greed at this time.

The Forest Reserve class of protected area should be retained for the flexibility it provides in moving areas such as State Forest that contain multiple tenures into other forms of protected area while tenure issues are resolved. There appears to be no gain from the abolition of this class of reserve and significant loss of flexibility.

The change from requiring management plans for parks to requiring a management statement appears to significantly weaken the planning required to manage a park for its intended purpose. Each park contributes to the Cardinal Principle in its own way and its management plans should reflect that. While I strenuously object to any commercial or inappropriate recreational activity in National parks, at the very least, there must be a comprehensive management plan in place before any alternate activity is considered so that the key values of the Park are understood and protected.

Further, the proposed change from management plan to management statement removes the opportunity for public consultation entirely. While there may be a case for reducing the 2 public consultation steps to one (provided genuine notice is taken of the public submissions as happened in the very successful GBRMPA rezoning activities of several years ago), there is no justification in removing public consultation entirely. While I have great respect for most of the public servants involved in decision making (I was one for 33 years), genuine democracy requires more than public consultation once every election. The ongoing engagement of the public in areas such as management plans is crucial to maintaining an engaged and thinking democracy as well as being good for better decision making. No government could afford to buy the advice freely given in a genuine public consultation process.

I trust my above concerns will be given full and careful consideration in the redrafting of this bill.

Thank you for the opportunity to make a submission.

Regards

Paul

Paul Sutton

Wildlife Preservation Society of Qld Councillor

*I acknowledge and respect the Traditional Owners and Elders past and present of country I have been privileged to live on and visit.*