

13 September 2013

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

Dear Sir/Madam,

Please find hereunder my submission on the proposed changes to the Nature Conservation Act 1992 in the Nature Conservation and other legislation Bill No 2, 2013.

I see no reason for any changes to the Nature Conservation Act, (the Act) as its management provisions currently cater for various uses of each protected area, within the conservation ethic for which the Act was established..

Any changes are likely to change the basis of the Act, and render null and void the cardinal principle for which the Act was set up, that is, the conservation of nature and the protection of native fauna and fauna and their habitat, both in designated National Parks and other protected areas.

To open up National Parks to commercial, social and cultural activities will undermine such protection now afforded by the Act, and should not be considered.

National Parks are currently open to many passive recreational pursuits, accessible to all. I fail to see why areas should be closed off to the general public by way of so-called 'Eco-Lodges' available only to the clientele of the resort.

I understand that there is a proposal to abolish eight classes of protected area. This will remove the opportunity to utilise these classes in the future and serves no purpose in the economic management of protected areas. These designations should remain.

I am against the proposal for regional park designation for former conservation parks and resource reserves. This smacks of lowest common denominator management status for these areas, and obliterates the reason for which these areas were classified, ie 'conservation' and 'resource reserve'. They would appear not to now have these considerations in place..

These designations should remain.

In the same vein, the separate designations of national park (scientific) and national park (recovery) should remain. Such areas were created for specific purposes such as the protection of endangered wildlife and the restoration of areas destined to become national park in the future.

To absorb these areas under the generic term of national park and provide merely for 'special management areas (scientific) and (recovery)' is unacceptable.

This proposal is likely to extinguish the cardinal principle of national park management, as activities which were permitted as legitimate under the designation of national park (scientic) and national park (recovery) will now be in breech of the cardinal principle.

Forest Reserve must remain as a legitimate tenure. It is an extremely important holding tenure while the land is in transfer to national park status under the SEQ Regional Forest Agreement., and while negotiations are taking place to finalise closure of activities permitted under State Forest designation.

I believe that there is a move to return many forest reserves to State forest status, under the Forestry Act, thus bypassing the strong requirements of the Nature Conservation Act against such action. This should not be permitted, as these areas act as, undesignated, national parks and afford protection to many species of native flora and fauna.

I oppose the proposal to abolish the requirement for each park, or aggregation of parks, to have a management plan, and instead replace it with a requirement for a management statement. This eliminates the comprehensive nature of a management plan, and it is unlikely that there will be any future preparation of a management plan that will ensure the best possible outcomes for the parks, and protection of their key values

I suggest that any park that is likely to be subject to activities such as the development of tourist resorts, and cattle or other livestock grazing, which are contrary to the cardinal principle for which national parks are created, must have a management plan developed, subject to public consultation, and implemented, prior to any authorisation of such activity.

This would ensure that the key values of the park had been fully assessed and evaluated and that measures would be in place to safeguard such values.

I am disappointed that public consultation for any management plan has now been reduced to one consultation, instead of two, and that management statements have no public consultation requirement. It would appear that, since parks are now only to be subject to a management statement, not a management plan, there is no requirement for any public notification or consultation prior to any proposals coming into force.

This is totally unacceptable. There must be public input to ensure that the best possible outcomes are achieved for the management of the area.

We would therefore ask that there is provision for management statements to be subject to at least one public consultation process.

It is imperative that, where there is a proposal for the development of any area of a national park or Reserve as a tourist resort, or to be opened up for grazing, contrary to the provisions of the Nature Conservation Act, a management plan must be developed, be subject to public consultation, and be implemented, prior to commencement of any such activity.

I am of the opinion, therefore that these proposed amendments to the Act should not be implemented. To do so would be a retrograde step for the environment.

Yours faithfully,

Mrs J S Chamberlain