



AMPTO are in support of the principles of the amendments which are to do with red tape reduction and increasing access to protected areas. However, the implementation of these principles presents some issues. Therefore; AMPTO's submission includes;

1. Support for the broadening of the object of the NCA to include the themes associated with use by the community, involvement of indigenous people in the management of protected areas, and the social, cultural and commercial use of protected areas in a way consistent with the natural and cultural values of the area.
2. Concern is raised regarding the provision of commercial use consistent with "other values of the area" that may threaten the natural and cultural value of the area.
3. Support for the reduction in the number of tenures to streamline legislative and regulatory complexity.
4. Concern is raised regarding the grouping of "Conservation Park" with "Resource Reserve" into the new class of "Regional Park". The intent of the 2 current classes is considered to be significantly different.
5. Concern is raised regarding provisions allowing for a "Resource Use Area" (RUA) declaration to be made on all, or part, of a Regional Park. An RUA allows for mining, geothermal activities and GHG storage activities by regulation.
6. Support for streamlining management planning processes under the Nature Conservation Act 1992 to reduce legislative complexity and red tape. This includes removing the mandatory requirement for the Minister to prepare a Management Plan.
7. Concern is raised over the lack of public consultation for management statements (to replace the management plans) over protected areas.
8. Support for an exemption from a commercial activity permit for filming and photography in a protected area where it involves no more than 2 persons and no erection, construction or use of a 'prescribed structure'.
9. Support for a single (combined) commercial activity permit or commercial activity agreement to extend across more than one tenure type (e.g. Marine parks, protected areas, recreation areas and state forests).

Yours truly,

**Col McKenzie**  
**Executive Director**