

**From:** [REDACTED]  
**To:** [Health and Community Services Committee](#)  
**Subject:** Submission on Proposed Amendments to the Nature Conservation Act  
**Date:** Friday, 13 September 2013 5:09:27 PM

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To Whom it May Concern

I wish to express my concerns regarding the proposed changes to the Nature Conservation Act.

In particular, I object to the the proposed amendment to the Object of the Act in Section 4, which completely changes 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. This may look harmless at face value. However, the object of an Act is the first port of call by a court of law when interpreting any provision of an Act. Despite statements to the contrary, this does change the cardinal principle of the Act.

I also object to the consolidation of conservation parks and resources reserves into a new class of protected area known as regional parks. The name has no implication of conservation and resource protection, when in fact these reserves have significant natural values. When you combine two classes of protected area in a hierarchy, the resulting management principles tend to shift towards the lowest common denominator. Every effort should be made to ensure this does not happen with regional parks; and a name change would be a start.

Other changes to tenures and naming seem to achieve little in terms of removing greentape; but leaving tenures as they currently stand does allow flexibility of management purpose.

Regarding management plans, these have also been slow to be developed and perhaps a simpler management statement will enable more to be produced, however, as long as management statements provide sufficient detail to enable management to protect the conservation values of reserves and uphold the cardinal principles of the Act. There may be an need for more detailed subsidiary documents for specific activities that undermine or contradict the intent of the Act, that provide more details and can be used to regulate activities. Community consultation is needed in the development of management statements; this should be an iterative process to ensure community sentiments and science are appropriately considered.

I look forward to your consideration of the above.

Regards,

Liz Horler