

The Secretary,
Senate Environment, Communications Information Technology and the Arts References
Committee
Parliament House,
CANBERRA ACT 2600
By email

**Submission to the Inquiry into Australia's national parks, conservation reserves and
marine protected areas**

We make the following submission and considering the terms of reference of the inquiry as set out below. Our submission focuses on Tasmania and terrestrial systems and we apologise for the limited scope due to our current time constraints.

Terms of Reference

The Senate has referred the following matter to the Committee for inquiry and report by 30 November 2006:

The funding and resources available to meet the objectives of Australia's national parks, other conservation reserves and marine protected areas, with particular reference to:

- 1. the values and objectives of Australia's national parks, other conservation reserves and marine protected areas;*
- 2. whether governments are providing sufficient resources to meet those objectives and their management requirements;*
- 3. any threats to the objectives and management of our national parks, other conservation reserves and marine protected areas;*
- 4. the responsibilities of governments with regard to the creation and management of national parks, other conservation reserves and marine protected areas, with particular reference to long-term plans; and*
- 5. the record of governments with regard to the creation and management of national parks, other conservation reserves and marine protected areas.*

Introduction

Currently even formally protected areas of Tasmania are not managed properly. There are no land clearance controls: this undermines the ability to achieve conservation on private land. Concern for the environment in Tasmania has declined for almost a decade and remains significantly less than all other states of Australia. Far from being clean and green Tasmania is the woodchip state where extraction of this natural resource has escalated to about double the pre RFA levels despite ongoing public condemnation.

Tasmanian Government influence over bureaucrats is often heavy handed and ensures compliance with government subservience to the pulp industry. The Tas. government

bureaucracies appear unable to fulfil their role of advising the government in the interests of all Tasmanians and implement the legislation impartially and unhindered. In this climate therefore we advise that the bureaucracy requires greater legislative support and power to implement genuine conservation measures over extractive and ecologically unsustainable activities. Stop conserving foreign interests and start conserving nature and therefore resources and thus sustainable jobs.

The Federal Government must recognise that the management of natural resources in Tasmania is incompetent and causes environmental harm. That undermines the rights of future generations to have the natural areas conserved as they become more enlightened and informed that the current administrators. The common good and the public interest have little redress in Tasmania against the corporate driven extraction of the nature based common wealth.

There is an absence of accurate baseline data on ecology and genetic diversity. Accordingly there is an absence of any meaningful information on the trends of species decline. You should be comfortable with the concept that reduction in habitat causes a reduction in species, both threatened and otherwise. The Threatened Species control has been given to the Forest Practices Authority and because the reserve system is inadequate to conserve threatened species such gifts to industry are a serious concern for the inquiry. We would advocate that only by increasing the reserve system can one gain security for threatened species.

Tasmania is now the only Australian state without land clearance legislation. It will become recognised as the state where the natural environment is raped and plundered. We know there are better ways to proceed and that more care is essential when our government is not prepared to stand up for our environment in a legitimate way. You may wonder how important this is to the reserve system; well it is vital to achieve adequate conservation. Many vegetation communities are found predominantly on private land. Currently the farmers are jumping up and down about the very small amount of threatened non-forest vegetation remaining, which Govt here is trying to be seen to conserve under Federal pressure without losing votes. So Thylacine farming and logging are continuing in Tasmania even though the Thylacine has gone. The lesson has yet to be learned.

Tasmania needs land clearance legislation, not some wishy-washy strategy or administrative arrangement. If people did not need laws we would not have them. The overwhelming evidence shows conclusively that laws are needed and that most people respect and obey laws. Strategies and policies are not viewed as binding or indeed as being compulsory. The backward attitudes in this state's conservation elements of the populace combined with the evidence of unsustainable land clearance indicate that laws to further protect the environment are urgently needed. Such legislation should have an aim of conserving nature and include incentives as such. Such laws should have the aim of encouraging an increase in the reserve system as only with secure reservation will such places be conserved.

Currently the nature, especially forests is exempt from valuation in the Tasmanian Valuation of Land Act. If it has no value in the Act how can the community value it properly?

The identified trend of a low and decreasing respect for the environment in Tasmania clearly shows the need for having land clearance legislation and laws rather than a strategy. Land clearance legislation must be introduced and be managed by an independent EPA in Tasmania.

It is illogical to determine percentage conservation statistics based on political boundaries on a state-by-state basis. If there is more land worthy of conservation on the island of Tasmania then more should be conserved for the benefit of Australia and visa versa.

We recommend that voluntary conservation programs be upgraded as an urgent priority.

We recommend that the Tasmanian minister for the environment start to advocate environmental care rather than assisting people to destroy our environment. Government must work to reverse the statewide trend of poor attitude and bigotry towards the environment. This is an issue for this inquiry as the illogical attitudes are a threat.

We advocate the establishment of an independent Environment Protection Authority, a statutory body with statutory powers. That under such a structure industry funded bodies such as the Forest Practices Authority would be subsumed and would thus stop being puppets of the pulp industry.

We advocate that in Tasmania all land planning be channelled through the one authority such as the RMPS and that exemptions for extractive industries be abolished. Currently some industries operate effectively beyond just and equitable laws where the citizens of this state have no say or right of appeal. This disgusting situation denies fundamental human and democratic rights.

Currently natural resources are not managed wisely. The precautionary principle is not being used. Reserve boundaries are having tree plantations established upon them and then the company doing so lures the animals out of the reserve and kills them with 1080 poison. This is a threat including to RFA priority species, the reserve itself and to threatened species.

Our society should make the point that until we know what is there and have documented what exists both in and outside of Reserves we should stop destroying it. Any other approach is unwise in the extreme. Only after you have discovered what and how much is there will you be able to assess what will require special conservation attention. It is a shame that the RFA's CRA is so inadequate and that new information is not being used to reassess the RFA.

This state is not systematically conserving genetic diversity, indeed the opposite is occurring. An enormous contraction in the gene pool is going on with the largest fire-sale clearance of natural vegetation in the state's history.

It would be a step forward if the reserves that have been established in Tasmania were:

1. Their purpose clearly defined
2. Identified on the 1:100,000 and 1:25,000 Tasmapi map sheets.
3. Signposted at all entry points.
4. Managed properly and transparently with:
 - Specific and proper plans
 - Staffing allocations and
 - Budgets for each reserve.

Currently many reserves are, for all practical purposes invisible with many not being signposted. Accordingly they are not part of the listed attractions of the state and are vulnerable to shooters, firewood getters and other illegal activities. We have no confidence that such invisible reserves are adequate.

The land clearance legislation should be commenced with a clearing embargo occurring instantly. After all if the state can introduce retrospective legislation for the loggers it can introduce a land clearance embargo effective immediately to stop an unholy rush. As it is with woodchipping at about 1.2 million tons per quarter per annum a vast land area of natural values and life supporting forests is being trashed. It is a national shame. Such places should be regarded as a national treasure, for their wondrous natural values, their beauty and balance especially in a scenario of climate change.

We would separate functions of conservation from those organisations primarily involved in development. For example, Forestry Tasmania should not be a reserve manager. It is a conflict of interest and the reserve management is always secondary to the tree killing function.

The land valuation system needs to be overhauled to include the valuing of ecological capital. Otherwise how can one either be rewarded for its conservation or penalised for its destruction or degradation if it is not valued with our other systems of value using the almighty dollar. How can local government offer genuine incentives if what they are trying to deal with has no identified value?

Logical and simple decisions void of vested commercial interest are required.

We do not agree that Tasmania's secure conservation reserve system is mature or even near mature. As the world's ecological crisis intensifies and if the current wilful destruction of the state's unprotected ecological capital has not been completed there will be an imperative to conserve what is left.

In that context we advise that we believe the current reserve system is not adequate, not comprehensive and not representative. Furthermore if you do not know this then we can only conclude that the job of education is larger than you have forecast.

We wholeheartedly agree with the statement "our knowledge of many key aspects of natural diversity is very limited ... what we know is far outweighed by what we don't know, and this restricts our ability to manage the natural world properly and wisely." For this reason it is impossible to pass judgement on the level of 'maturity' of the state reserve system.

We believe that it would be wise to place a halt now on further land clearance and including the conversion of natural forests to managed forests and the conversion of forests ecosystems to plantations as well as the restrictions on other vegetations.

We are entirely comfortable with a very substantial increase in the reservation of all ecosystems. The habitat of all organisms should be conserved especially those of key habitat of threatened species.

We are comfortable with the fact the Tasmania's future lies not with resource extraction but with ecologically sustainable development. But currently the state's ecological capital is undervalued by the state and this will cause a lost opportunity to future generations. This is selfish behaviour that cannot be excused. We see no excuse for not addressing this crucial issue as a fundamental part of this inquiry for Tasmania, which we regard as a threat and as part of long term planning.

The reforms that we have suggested need to be implemented by a government with vision and courage and a genuine desire to do good for the future. After all, with a stable population such as in Tasmania and with limited resource bases the conventional economic

capitalist theory of sustained growth based on overexploitation of the limited natural capital is not logical or sensible and certainly not ecologically sustainable.

Forest Reserves

From the Tasmanian Act, Schedule 3 of the Forestry Act 1920 the following objectives for Forest Reserves in Tasmania are described below.

These objectives are very broad and generally no management plans for forest reserves are produced. Forest Reserves are included in Forestry Tasmania District Plans but these plans are oriented towards wood production. The information in these plans on reserve purpose and significance is inadequate in most cases and the often the only plan for the reserves is contained in Schedule 3 of the Act.

The brief information strongly suggests to us that Forestry Tasmania is driven by a wood production economic incentive rather than any altruistic concern for the reserve system that it is meant to be managing. We contend that in the main FT is not managing that reserve system and that there is a conflict between its corporate aspiration for wood production and its community conservation obligations.

SCHEDULE 3 - Objectives for management of forest reserves

Sections 20(2D) and 22C

1. The objectives for the management of forest reserves are as follows:

- (a) to conserve natural biological diversity;*
- (b) to conserve geological diversity;*
- (c) to preserve the quality of water and protect catchments;*
- (d) to conserve sites or areas of cultural significance;*
- (e) to encourage education based on the reserve's purpose and significance;*
- (f) to encourage research, particularly that which furthers the purpose of reservation;*
- (g) to protect the reserve against, and rehabilitate the reserve following, adverse impacts of fire, introduced species, diseases and soil erosion on the reserve's natural and cultural values and on assets within and adjacent to the reserve;*
- (h) to encourage appropriate tourism, recreational use and enjoyment;*
- (i) to encourage cooperative management programs with Aboriginal people in areas of significance to them in a manner consistent with the reserve's purpose and other reserve management objectives;*
- (j) to provide for the controlled use of natural resources;*
- (k) to provide for exploration activities and utilisation of mineral resources;*
- (l) to provide for the taking on an ecologically sustainable basis of designated game species for commercial and private purposes.*

We favour in regard to the reserve system managed by Forestry Tasmania that because they complain about the impost of their public service obligation and how it impacts on their corporate goals that they are relieved through this process of their reserves completely. They could be vested in a manager that does not have such a conflict between wood production and conservation.

Informally Reserved Forest

There is a very large area of informally reserved forest. Many areas are large and would be better managed in the formal reserve system. They are not secure at present. We propose that all useful sized such areas say of more than 100 Ha in size should be formally reserved in the appropriate IUCN category.

Additionally there is a substantial area of informal reserve that adjoins the existing secure reserve system. These areas should be included in the existing secure reserves and those areas gazetted as an addition to the current reserve.

Informally reserved forest is currently managed by Forestry Tasmania. Not all the areas of informal reserve created by the RFA were actually set aside as such. A complete investigation of the informal areas that were promised but not delivered should be conducted as a part of this inquiry.

When such areas are found they should be added to the reserve system and especially when they include key habitat for threatened fauna.

Funding of Private Land Conservation.

Whilst the Commonwealth secured the signatures of each State Government in support of the National Forest Policy Statement it must be said that it was a Commonwealth initiative. The Commonwealth is also the signatory to the International Convention on Biological Diversity. The main reason for the conservation of private land is the protection of biological diversity and other natural life support systems. Tasmania supported the NFPS and the Biodiversity Convention through explicit agreements that commit them to undertakings to ensure Australia honours its obligations under the convention.

Tasmania is a state with the population resources of the average suburban municipality in either Sydney or Melbourne. It would have been unreasonable and probably onerous for the Commonwealth to expect Tasmania to shoulder what is a national and international responsibility.

Tasmania's role is clearly to support the most effective means for conserving properly and effectively biodiversity on private land at the least cost to the Commonwealth. That would be achieved most economically with the support of State legislation restricting the clearance of forested land. Shamefully this has not happened under the RFA. Indeed the State's private land conservation effort under the RFA has been a shambles.

If the state failed to enact such legislation or other effective controls they must take additional fiscal responsibility for their actions in the form of additional financial resources directed to ensuring that the Commonwealth's international obligations can be met. We view land clearance legislation as imperative and responsible. There are a number of models from which to draw.

Whilst Tasmania has limited capacity to pay for conservation on private land it does have the ability to facilitate the conservation of land through legislative enactment. To not do so must be regarded both as a breach of its duty of care and of the RFA.

In May 1997 The RMFCG proposed that the Commonwealth fund the conservation of private land in Tasmania contingent upon land clearance legislation being enacted. We also recommended: “In the absence of Tasmanian private land clearance control legislation we propose the RFA stipulate that the State pays for a land conservation program that meets the Commonwealth’s guidelines.”

The RFA And Tourism - Regional Forest Agreement - Aspirations And Outcomes For The Region’s Forests And Reserves

The outcome from the Regional Forest Agreement (RFA) was the further entrenchment of the dominant woodchip export players with the deregulation of the Federal controls that have in the past been an important brake on industry.

The focus on plantation establishment saw private land cleared at a significantly increased rate. Export woodchips increased.

The forested land that was reserved in the RFA was in general on the less productive and less commercially viable sites, often on steep slopes and poorer soils, etc. Where plantation viability is marginal. Some important conservation outcomes were achieved but there is no guarantee that many of the smaller reserves will be sustainable or that the process of species decline will be arrested. There remains important unprotected forest that would have been conserved under a level playing field. RFA reservation targets were eroded for “social and economic” reasons relating purely to the forestry industry. The resulting contraction of our reserve system and subsequent loss of natural environment works against the tourism industry. The social and economic benefits of tourism were not adequately articulated or considered in the RFA.

The loss of these forests to an industry that wants both more plantations and an essentially free native forest resource will impact in the longer term on this state’s strategy to increase nature based tourism and maintain biological diversity.

Tourism was a poor performer in the RFA in terms of understanding the RFA’s impact on the tourism resource and in lobbying for security for the industry. The conservation movement spoke in favour of tourism repeatedly during the RFA process with limited success. The loser is the state. The state is unable to determine the implications of its own statistics. The dominant forestry corporations have clearly had a disproportionate influence on the result. The economic and social benefit that accrues from their activity is simply not as large as their muscle suggests.

The implications for tourism is that it now has to perform with what is available and suitable for visitation; a subset of the reserve system. Many reserve destinations are totally unknown and totally undeveloped.

Money to support promotion of secure reserves as tourism job creation in the RFA was misdirected. The best example is the Great Western Tiers Visitor Centre where much of the \$1.5mil got diverted.

Identification Of Reserves In The Central North Region

The following list provides ample evidence of a strong environmental advantage. Our draft list of 64 reserves cover the existing and new reserve criteria on which the natural advantages should be based.

Some of these are not suitable for visitation, some should be limited to restricted activities, some are quite robust and can sustain substantial visitation.

Deliberation over the suitability of reserves for visitation and tourism is a prerequisite to considering increased use.

What reserves are in existence now?

NB a draft list.

1. Alum Cliffs State Reserve
2. Bakers Beach National Park
3. Black Jack Hill Forest Reserve
4. Bonney's Tier Forest Reserve
5. Bradys Creek Forest Reserve
6. Brushy Dam RFA Reserve
7. Brushy Rivulet Forest Reserve
8. Carolina Creek Forest Reserve
9. Central Plateau Conservation Area
10. Christmas Hills Forest Reserve
11. Coppermine Creek Forest Reserve
12. Dalgarth Forest Reserve
13. Dans Hill Forest Reserve
14. Dasher Falls RFA Reserve
15. Devils Gullet State Reserve
16. Dogs Head Hill Conservation Area
17. Drys Bluff Forest Reserve
18. Fairy Glade
19. Forest Vale Forest Reserve
20. Franklin Rivulet Forest Reserve
21. Gog Range RFA Reserve
22. Great Western Tiers, Jackeys Marsh RFA Reserve
23. Great Western Tiers, Liffey RFA Reserve
24. Great Western Tiers, Millers Bluff 1 RFA Reserve
25. Great Western Tiers, Millers Bluff 2 RFA Reserve
26. Great Western Tiers, Mole Creek/ Meander RFA Reserve
27. Great Western Tiers, Poatina RFA Reserve
28. Great Western Tiers, Threshermans Hill RFA Reserve
29. Great Western Tiers, Tumbledown RFA Reserve
30. Gum Scrub Creek
31. Holwell Gorge State Reserve
32. Jackeys Creek Forest Reserve
33. Liena RFA Reserve
34. Liffey Forest Reserve
35. Lizard Hill Forest Reserve
36. Lobster Rivulet Forest Reserve
37. Long Hill RFA Reserve
38. Long Ridge Forest Reserve
39. Maggs Hill Forest Reserve
40. Meander Forest Reserve
41. Mersey River Forest Reserve
42. Mersey White Water Forest Reserve
43. Millers Bluff Forest Reserve
44. Mole Creek Karst National Park: comprising the former:
 - Westmorland Falls Waterfall Reserve
 - Wet Cave Reserve
 - Uncommitted Crown Land Block on Caveside Road
 - Baldocks State Reserve
 - Cave Country Reserve
 - Guides Reserve Adjacent
 - Kubla Khan Reserve
 - King Solomon State Reserve
 - Croesus State Reserve
45. Mt Careless Forest Reserve
46. Mt Careless RFA Extension Reserve
47. Mt Roland RFA Reserve
48. Notley Fern Tree Gorge Reserve
49. Parangana Sugarloaf Forest Reserve
50. Peaked Hill Forest Reserve
51. Poatina Forest Reserve
52. Porcupine Hill Forest Reserve
53. Quamby Bluff Forest Reserve
54. Reedy Marsh Forest Reserve
55. Reedy Marsh RFA Reserve
56. Roaring Magg Hill Forest Reserve
57. Sensation Gorge Conservation Area
58. Standard Hill RFA Reserve
59. Stephens Hill Forest Reserve
60. Tom Gibson Nature Reserve
61. Virginstow Forest Reserve
62. Walls Of Jerusalem National Park
63. Warrawee Creek Forest Reserve
64. Yorktown RFA Reserve

We may not have identified them all. Many are small and this list does not include the informal reserves, some of which as we have stated could be amalgamated with the secure reserves. A

greater effort to establish connectedness of the reserve estate is essential especially for threatened species such as the Spotted Tailed Quoll. The central north of Tasmania is a priority area for the Quoll yet plantation conversion continues apace both on private and public land. The reserve system is very inadequate for the Quoll and the CRA assessment was likewise inadequate but has not been fixed despite better knowledge.

Additional Reserves

We remain committed to an expanding reserve system in our area including those parts of proposal for reserves that were not included in the CAR reserve system such as our great Western Tiers National Park proposal and that additional area proposed for Reedy Marsh. Both areas fall within key habitat for the Spotted Tailed Quoll. Another area we have advocated reservation is the Dazzler Range to our north. Indeed we support the reservation of places set out in the document Protecting Forests Growing Jobs.

In that document not enough emphasis was given to the poorly reserved forest communities and private land conservation, however if it were implemented significant deficits would be addressed.

Private Timber Reserves

Private Timber Reserves (PTR) are threats to secure conservation reserves when they are established up against the secure reservation system. We would like to provide additional information on this subject but at this stage the information is being considered by the Forest Practices Tribunal. There are no appeal rights against activities on a PTR. PTRs intensify industrial forestry in Tasmania and usually do not consider the landscape consequences and thus are unsustainable. No adequate assessment of the impacts is done prior to creating them.

Fire

We consider that fire is a tool of management that is easily abused to the detriment of biodiversity. Often fire burns out logs and old growth trees. Foresters love fire and cannot help but to light a few every year. They often simplify the forest and reduce the old growth habitat. Only very rarely are they needed. Reduced access especially vehicular access reduces the chances of accidental fire. Many reserves are managed by foresters in the charge of Forestry Tasmania.

Conclusion

The lack of funding allocation to Tasmanian reserves is very obvious. Tasmania repeatedly relies upon Commonwealth for funding for such purposes and that is not adequate. If export woodchip were not so heavily subsidised there would be more money for such things as reserves and health and education. This is a third world extraction state. If you want to know more read what Saul Eslake from ANZ says about Tasmania.

END