

10th February, 2006

Re: Appropriate regard for management objectives within Australia's National Parks.

Dear Sir or Madam,

Thank you for the opportunity to submit our concerns with the current state of management of Australia's natural areas reserves.

We submit our comments below: note that most of our experience of the natural areas reserve system is within New South Wales, although we suspect that similar issues apply to reserves within all Australian States and Territories.

We are aware that most government agencies charged with the responsibility of managing natural areas are generally doing their best with limited resources and reduced staff, yet it is apparent to even a casual observer or visitor to any of the country's National Parks or Nature Reserves that the current methods of maintaining biodiversity in these areas are insufficient.

In summary, the main issues which we believe that the Inquiry must address are as follows:

- there are now many more management plans for the various reserves and parks under NSW National Parks & Wildlife Service management than ever before, yet the evidence suggests that very few of the recommendations within these management plans are acted upon, while it appears that recommendations for some reserves are not followed through at all;
- while there are more management plans completed, there are fewer staff and reduced budgets (imposed by ever tighter government budgets) to implement them, raising the question of why so much time, money and effort is spent on management plans at all if very little of them is to be implemented;
- lack of co-operation and co-ordination between various government agencies – we have given details of one such incident below. This incident, while a predominantly local matter, seems to us to be typical of the lack of a co-ordinated approach to the management of biodiversity in the country's reserve system. We are aware of many other similar instances, particularly where large-scale or potentially damaging processes such as bushfire are being considered. In NSW, there are several glaring inconsistencies between the policies of the state's bushfire authority and the fundamentals of biodiversity conservation, particularly in the lack of detail regarding appropriate fire regimes for threatened species;
- lack of co-operation and co-ordination between various levels of government (*i.e.* Federal-State, between States and State-Local): policy emphasis often differs between different levels of government, often to the detriment of biodiversity values;
- despite the great number of management plans for individual reserves, it appears that there still exist many reserves and national parks where no formalised management plans have been drawn up, resulting in uncoordinated practices;
- despite the large number of management plans for national parks and reserves, it appears that a myriad of threatening processes (both those listed under state or federal legislation and those which remain formally unrecognised) are still in operation. These include weed invasion, predation by feral animals, loss of threatened species and endangered ecological communities,

increasing numbers of species and communities being listed under conservation legislation, use of the reserve system for practices inimical to conservation, poor or non-existent management of long-term and/or broadscale processes (including unplanned bushfire, pollution of waterways), degradation of footpaths, and downgrading of visitor infrastructure;

- legislative changes – in NSW at least, recent changes to environmental planning policy and law will make it more difficult to ensure that adequate planning for future biodiversity conservation is undertaken, as most major projects can now be taken out of the established planning process by the Minister. Further changes to threatened species conservation legislation has reduced the onus on the Department of Environment and Conservation (formerly NP&WS) to formulate and implement threatened species and endangered ecological community recovery planning. In addition, Acts which effectively bypass existing conservation legislation (such as the *Filming Approval Act* 2004 in NSW which circumvented restrictions on commercial activities in declared Wilderness Areas under the *National Parks and Wildlife Act* 1974) will water down both the power of the agencies entrusted to manage the national parks estate and the spirit of conservation legislation;
- many government agencies are now under some pressure from organised lobbying from vocal minority groups, such as 4 wheel drive clubs, shooters and other ‘recreational’ groups. Many of the objectives of such groups are antithetical to the primary rationale of the natural reserves system – that of the conservation of biodiversity. We cannot see how the wishes of 4-wheel drive clubs can sit comfortably with the need to conserve fragile ecosystems (such as coastal dune vegetation types), especially when such groups insist on their ‘right’ to use these areas – similar comments also apply to high-profile minority groups such as horse-riders (*e.g.* in Kosciuszko National Park). Regrettably, DEC has chosen to allow such uses within many of its National Parks, to the detriment of biodiversity conservation and parks users following a more passive hobby;
- despite the many management plans for a range of national parks and conservation areas, planning and land use practices in adjacent areas continue to impact on biodiversity and conservation measures undertaken in national parks. Typical long-term threats include weed invasion, feral animals, altered hydrological and edaphic regimes, and altered fire regimes (especially in reserves near urban areas), while more immediate effects along the shared boundaries between natural reserves and large-scale developments include severing of biodiversity corridors, loss of vegetation, loss of soil, drastically reduced population diversity for those species remaining in natural areas and air, water and soil pollution. Little in any management plan for any reserve appears to acknowledge these pressures, and even less is done;
- it appears that most government agencies responsible for biodiversity conservation and management of national parks are under increasing pressure from both commercial interests and politicians to allow more commercial “interests” within those reserves: we cannot see how such contrary interests as big business and biodiversity conservation can be made to sit comfortably with each other, even where management plans and policy within those government agencies allows for this;
- it is evident that terrestrial processes affect marine processes, and vice versa, yet conservation of marine biodiversity appears to have been mostly ignored, at least at State level. This must be remedied immediately;
- road systems in national parks: as the detailed correspondence below indicates, roads in national parks are often poorly managed, from the perspectives of both biodiversity and adequate road safety. Obviously roads are necessary within national parks to allow public access, but these cannot be built and maintained at the cost of biodiversity and conservation;

- funding: while we agree that there should be fees applying to members of the public who wish to enter a national park or nature reserve, it seems to us that the majority of the funds that entry fees generate should be spent on those parks or reserves, not simply diverted into central agency coffers or back to central government.

We thank you for this opportunity to comment on the management of Australia's national parks system: we believe that the fundamental philosophy which must inform policy in these and similar reserves must be that biodiversity conservation comes first. While other competing or contrary interests could be incorporated, those other uses and users must not be accommodated at the expense of biodiversity conservation. Similarly, funding for biodiversity conservation purposes must be *increased*, along with an attendant increase in resources and staffing levels to ensure that policies and regulations within relevant management plans can be implemented.

If you require further information, please do not hesitate to contact the undersigned.

Yours Faithfully

Handwritten signatures of Claire deLacey and Steven Chamberlain, separated by a plus sign.

Claire deLacey and Steven Chamberlain