

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



28 February 2006

To whom it may concern,

Please find attached a submission from the Tasmanian National Parks Association in relation to the Senate Inquiry into Australia's national parks, conservation reserves and marine protected areas.

Please let us know if the Committee will be providing the opportunity to supplement written submissions with oral evidence.

Yours sincerely,

A handwritten signature in black ink that reads 'R Campbell'. The signature is written in a cursive, flowing style.

Robert Campbell
President, TNPA



February 2006

Inquiry into Australia's national parks, conservation reserves and marine protected areas

Senate Environment, Communications, Information Technology and the Arts Committee

The Tasmanian National Parks Association (TNPA) provides the following feedback to the Senate Committee in response to its request for written submissions on the above inquiry.

Tasmania has a world class National Park and reserve estate – it deserves world class care.

There is strong evidence to show that the care Government provides has been and is currently inadequate.

Flexible and adaptive management by the staff of the Tasmanian Parks and Wildlife Service has helped but funding and government policy are not keeping up.

While the size of the reserves is growing along with the number of visitors, the state of our parks is declining.

Fixing this will require adequate investment.

Terms of Reference

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:

- a. the values and objectives of Australia's national parks, other conservation reserves and marine protected areas;
- b. whether governments are providing sufficient resources to meet those objectives and their management requirements;
- c. any threats to the objectives and management of our national parks, other conservation reserves and marine protected areas;
- d. 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
- e. the record of governments with regard to the creation and management of national parks, other conservation reserves and marine protected areas.

The Tasmanian National Parks Association

The Tasmanian National Parks Association (TNPA) is a non-profit, non-government organization which gives park users a voice on issues that affect the Tasmanian reserve system. Like similar associations in other Australian States, the TNPA provides a link between the community and the park policy makers, to identify and address issues concerning the ongoing management of Tasmania's reserves. Formed in August 2001, the TNPA presently has a membership of over 100 people.

*** - The terms, 'reserve' or 'reserve system', is used in this submission to denote national parks, other conservation reserves and marine protected areas**

Key Principles

1. Australia's reserve system is a significant contributor to the environmental, social, cultural and economic wealth of the Australian community
2. Reserves are the keystones to efforts to conserve and protect biodiversity, cultural and natural heritage and ecological function. Reserves act as the core reservoirs of much biodiversity, provide protection to cultural and natural heritage values and deliver a wide range of ecological functions including clean water and air, climate modulation, habitat for resource species (eg fish stocks) and scientific resource.
3. Reserves contribute to the health and wellbeing of Australians. They provide clean air, water, opportunities for exercise, recreational opportunities, inspiration and spiritual nourishment for many people
4. The values of reserves are considerable and rarely adequately recognised by government or the broader community in terms of resources.
5. Reserves cannot function in isolation from the broader landscape and society. The values for which reserves are created also exist outside the reserve systems and are just as valuable and need managing whether in or out of the reserve system. The objectives within the reserve system need to be integrated with management objectives outside the reserve system.

General comments addressing the terms of reference

a. The values and objectives of Australia's national parks, other conservation reserves and marine protected areas;

- The primary objective of the reserve system should be conservation of biodiversity and natural and cultural heritage. (Note: the TNPA supports the state and national reserve categories being in line with the IUCN reserve categorisation.)
- Aside from their primary conservation purpose, parks and reserves also provide opportunities for recreational, cultural and tourism activities based on their protected values. Indeed, in most cases these protected values are integral to the reasons that people visit and access reserves, e.g. wilderness values for some people involve the opportunity to experience the wilderness first hand through adventure in the wilderness or cultural heritage values might involve people being

able to walk on ancestral lands or participate in rituals such as annual family camping trips to particular natural areas.

- Tourism is a major contributor to the Australian economy, and National Parks are consistently cited in visitor surveys as one of the most popular activities for tourists visiting the nation. Within Tasmania, parks and reserves are regularly used to promote the State and the total economic value of this contribution is substantial.
- Whilst tourism is an important component of recreational access to reserves, a key emerging issue is how increasing tourism and visitation can be effectively managed to deliver ecologically sustainable human use without degrading the area's natural and cultural heritage. The TNPA supports the need for reserve management plans to have an integrated visitor strategy.
- Health and wellbeing. Our parks contribute to the health and wellbeing of Australians. They provide clean air, water, opportunities for exercise, recreational opportunities, inspiration and spiritual nourishment for many people.
- Water and energy. Tasmania generates its energy from hydro electricity. Much of this water is sourced from the pristine catchments of our parks. These deliver high quality water which benefits energy production and contributes to lower costs of water purification for many water supplies. The huge cost benefits of undisturbed catchments in water management are well documented.
- The brand and spirit of Tasmania. Tasmania in the eyes of the world and our own identity is synonymous with its beautiful naturalness and wildness, primarily preserved in its reserve system.
- Measuring the worth of parks in dollar terms is not easily done, but clearly the benefits they deliver are huge. Their loss would have an immeasurable impact on the environmental, cultural and economic wellbeing of Australia. Consequently, the TNPA argues that the critical consideration is not what they are worth, but what does it cost to care for them so that they are maintained sustainably for now and into the future. Indeed, the real cost to Australia lies in the loss of our reserves not in their preservation.

b. Whether governments are providing sufficient resources to meet those objectives and their management requirements;

- It is very clear in Tasmania that the government is not providing sufficient resources to meet the objectives and management requirements of its reserves (see threats below).
- In addition to greater resources, there needs to be a strong emphasis on engaging the wider community in the values and benefits of the reserve system. This is critical to sustaining long term political support for better reserve management and for building greater protection of the values both in and outside the reserve system.
- The level of resourcing for Tasmania's marine protected areas is almost non-existent. Despite six reserves there is not one dedicated MPA specialist member in the Tasmanian Parks and Wildlife Service. In addition next to no money has been

spent promoting these areas for many years. Hidden beneath the waves these are very much the poor cousins in Tasmania's reserve system.

- There is a need to expand no-take areas within larger networks of marine protected areas, as well as a need to increase the "sympathetic" management of the ocean realm outside marine protected areas. (see, for example, "Marine no-take areas: How large should marine protected area networks be?" at www.onlyoneplanet.com.au).
- The TNPA currently holds fears that the Commonwealth Government will buckle to pressure from self-interested sections of the commercial fishing industry in relation to the South East Regional Marine Planning Process. The likely result will be that the long awaited marine protected areas to ultimately be established in the South East Region (then elsewhere around Australia) will be inadequate to properly achieve the goals of marine planning and will not enable Australia to meet its international commitments to the establishment of marine protected areas.

c. Any threats to the objectives and management of our national parks, other conservation reserves and marine protected areas;

- Tourism, through creeping development and the attrition of natural and wilderness values, is a major threat to the integrity of Australia's reserves and the achievement of sustainable conservation and protection of their associated values. For example, within Tasmania the demand for car-parking at places like Dove Lake and the Blowhole and for camping in coastal reserves outstrips supply leading to overcrowding and loss of naturalness. (There are over 30 campgrounds in coastal reserves along north eastern Tasmania alone – this gives some idea of the size of the problem, state-wide there are hundreds of car-parks, campgrounds, picnic sites and trail heads struggling to cope with the fast growing visitor numbers.) While these are usually carefully managed to minimise the environmental impacts, they are never the less degrading to the naturalness of the reserves and cumulatively dramatically altering the quality and tone of visitor experience from one of informal naturalness based on the reserve being an anti-thesis to the 'developed' world to a contrived built environment experience offering a range of consumption choices not dissimilar to the world outside the reserve. The TNPA also recognise that tourism is a potent double edged sword. As well as offering these threats it is also a major incentive for government to invest in the reserve system and does make a significant contribution to regional economies. However the qualities that people visit parks for need to be carefully managed when developing them for visitation.
- The temptation of a cash strapped Tasmanian Parks and Wildlife Service and a Government keen to attract tourist dollars and investment is seeing the siting of large-scale tourism developments in the states reserves (primarily in National Parks). For example, in recent years the Tasmanian Government has approved several 4+ star resort-type developments within Tasmania's national parks, including the Southwest National Park (at Cockle Creek East), the Cradle Mountain-Lake St Clair National Park (at Cynthia Bay and Pumphouse Point), and within Freycinet National Park (at Darlington). The siting of such developments within reserves is the very anti-thesis of the primary conservation objective underlying the creation and ongoing management of such reserves.

- Many of Tasmania's iconic bushwalking tracks continue to degrade as maintenance and development fails to keep pace with walker numbers and impacts. As outlined in the 2004 State of the Tasmanian Wilderness World Heritage Area – an evaluation of management effectiveness” (Report No. 1, Department of Tourism, Parks Heritage and the Arts, Tasmania) many walking tracks in the Tasmanian Wilderness WHA are not currently being sustainably managed (p107): many tracks continue to erode, unplanned tracks continue to develop; and backcountry campsites continue to expand and deteriorate, especially in alpine areas. The walking track network within Tasmania (estimated at 1,057 km within the TWWHA and 3,100 km in total) collectively constitutes the single largest infrastructure asset managed by the Tasmanian Parks and Wildlife Service. However, the management objective to manage walker usage within ecologically sustainable limits is clearly not being met. (Note: As reported in the 2003 State of the Environment Report, in the early 1990s it was estimated that 120 km of track were already heavily eroded to a depth of 25 cm or more, while a further 150 km of track were muddy and 85 km were braided. Furthermore, ongoing monitoring data from throughout the WHA indicates that deterioration is continuing on unimproved tracks.)
- Recreational vehicle track usage and associated destruction of fragile habitats and cultural sites is widespread in reserves, usually concentrated in coastal reserves. Within Tasmania, describing damage done by off-road vehicles in the Southport Conservation Zone, Mr. Michael Hodgman (Member for Denison, Tasmania MHA) stated “I say quite bluntly to the House, and I think all members would agree, that a mishandled four-wheel drive in a very sensitive environmental area can do as much damage as a small army tank. I was as horrified as any to see the photographs of damage in the Southport area. I have seen, in other parts of the State, damage done which is absolutely horrific.” (Hansard, Tasmanian House of Assembly, 1 December 2005). Already modified areas, outside the current reserve system, need to be identified for recreational vehicle use.
- Weeds, pests and pathogens are a major risk to our reserve system and the values they seek to protect. Weed management in Tasmania's reserve system is woefully inadequate. Many rangers resort to ‘bribing’ volunteers with small contributions of some poison or tools to get a small amount of weed control done. This ‘care’ group model of weed control can be quite effective but to date the contribution from the Tasmanian Parks and Wildlife Service has been inadequate – primarily due to lack of funding. In other areas such as feral animals and pathogens (eg phytophthora) more resources are allocated but with the exception of some feral animal control exercises in limited locales (eg cats on Macquarie Island) these threats continue to get worse and further degrade the reserve system and its values. Much more needs to be done if these threats are to be managed sustainably.
- Fire is a significant threat. Currently it receives a reasonable level of funding and management attention.
- Many so-called "reserved" areas are open to destructive mining activity. Resource extraction should only be allowed in certain reserve categories in line with IUCN categorisation and always as a secondary activity in the particular reserve.

- Lack of resourcing itself poses a major threat as the current resourcing level does not provide a sustainable level of management of the threats. There are also inadequacies in the statutory regime and management resources - exemplified by recent petroglyph and midden destruction within the Arthur Pieman Conservation Area. The threats are currently winning over our reserve system.
- Viewing an adequate reserve system as being enough for biodiversity conservation is a significant risk to the core objective of biodiversity conservation. There needs to be a policy and managerial recognition of the need to influence land management practices across the whole landscape to maintain biodiversity. The reserve system can then be both an important contributor to biodiversity across the whole landscape and will also be more sustainable when surrounding land use practices are complementary. Regional NRM planning needs to be closely integrated with the reserve system management.
- A lack of community ownership and appreciation of the reserve system and its values also poses a major threat to the continued sustainable management of these areas.

d. 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

- **Duty of care:** Governments should be the primary body responsible for the creation and ongoing management of the reserve system. The TNPA would strongly argue that a robust publicly owned reserve system should be central to any government's responsibility. Many of the values are not easily assigned a dollar value or market mechanism to protect them and will be held in high regard as a "common-wealth" (for example the ownership of 'wilderness' or any particular species and its existence).
- **Management Planning.** Governments need to ensure that adequate management objectives and associated management plans exist for all reserves. Furthermore, it is critical that performance indicators and management benchmarks be identified to assist monitoring and achievement of management performance. The 1996 Regional Forest Agreement saw the Tasmanian Government undertake to develop management plans for all reserves – however, this program has run consistently behind schedule. More resources are needed to ensure adequate management planning is undertaken by the Tasmanian Parks and Wildlife Service.
- **Recreation and Tourism.** Governments need to ensure that the conservation of the natural and cultural assets protected within reserves remain the primary management objective. In so doing, Governments need to minimise the threats posed by increasing visitor numbers and severely restrict tourism infrastructure within reserves, especially National Parks. Such infrastructure should principally be for the needs, interests and abilities of day visitors, with overnight accommodation facilities to be sited outside such reserves. The TNPA urges recognition that National Parks have a distinctive function to perform that is separate from the service of conventional tourism. As such, the TNPA believes that certain kinds of developments and activities, if allowed in parks, will

undermine the attitudes that parks can, and should, encourage. The TNPA argues that a park full of up-market accommodation developments, together with planned and standardised activities promotes passivity and dependency and does not engender a participatory role in Nature, whereas an undeveloped park leaves the visitor to set his own agenda and allows one to become immersed within and understand the wonders of Nature unimpeded. In this regard, National Parks allow us an opportunity to rediscover our sense of Self and our links with the Natural world – opportunities which are now lost in our modern city-scapes and societies. As such, the TNPA calls on Governments and the tourism industry to acknowledge this unique role of National Parks, and to ensure that our National Parks remain the havens for nature conservation and self-reflection that they were originally set aside for. In this regard the TNPA supports the vision outlined by the Tasmanian Parks and Wildlife Service in their Strategic Framework for visitor services in Tasmania's parks and reserves:

“Everyone who visits our parks and reserves is there to experience the natural and cultural areas at first hand: to be immersed in areas that feel largely untouched: to experience their beauty and tranquility.”

- **Asset maintenance.** The primary asset of the Tasmanian Parks and Wildlife Service is the 36 percent of the State's land mass that it is responsible for. This asset cannot be divested. Our understanding is that Tasmanian Parks and Wildlife Service is undertaking the development of a best practice asset inventory and schedule of maintenance costs. It appears that when this is complete it will clearly show what is evident on the ground – that the current built assets are not being sustainably maintained. For example the annual budgets of Parks sees critically needed maintenance such as the revamped Maria Island Jetty (c \$800,000) or the Wineglass Bay Lookout track upgrade (c\$500,000) occurring while many more examples around the state slowly degrade. This will require significant catch-up maintenance works in addition to an increase in the ongoing maintenance bill. (it is important to note that this discussion only refers to the built assets of the reserve system – obviously the natural assets are the main value and reason for reserves and their maintenance needs to be measured not in dollar terms but in whether or not they are being sustainably managed)
- **Research.** There is an ongoing need for research into, and the collection of information on, the natural and cultural values/assets of parks and reserves: Within Tasmania, currently only a very small amount of funding is going into this area – it is highly inadequate. Good understanding is critical to long term management. The focus has been on botanical values and to date there are few if any national parks or larger reserves that have had full geoheritage or historic heritage inventories carried out or had the Aboriginal cultural heritage values substantially assessed. In the past the Tasmanian government has relied on Federal funding to do this, but there is no longer funding for this. This situation needs to be rectified so that the State can continue the investment in building a strong baseline inventory and understanding of the critical assets in our reserves.
- **Ongoing monitoring.** In addition to the creation of an inventory of baseline data is a strong commitment to a coordinated, prioritised and well funded research and monitoring strategy of reserve values. Indeed, achievement of management objectives can only be achieved if underpinned by a well funded and coordinated

research and monitoring strategy. An excellent prototype for the type of evaluation of management plans required is the “State of the Tasmanian Wilderness World Heritage Area” report previously mentioned.

- Evaluation of Management Effectiveness. Together with the need for ongoing research and monitoring, management effectiveness needs to be evaluated and reported on a regular basis (e.g. every 5 years) and this should be undertaken with a view of informing changes to or preparation of new management plans.
- Promotion and community participation. The current Tasmanian Parks and Wildlife Service management team has recognised the need to promote the value of parks to the Tasmanian community and build stronger positive relationships with them. This is critical for the long term sustainability of our parks. It also costs money. The changes recognise that this area has been inadequately addressed in the past. But building this new relationship will take time – people time, and that costs money.
- Policing and enforcement. The recent defacement of Aboriginal carvings at Arthur River and destructive recreational vehicle activity in Southport Lagoon Conservation Area highlight the need for policing and an effective enforcement regime. With many thousands of kilometres of coastline, reserve boundary and hundreds of public access points across the state the Tasmanian Parks and Wildlife Service clearly is always going to have to stretch to provide effective enforcement and policing. Currently the resources, the people on the ground are clearly inadequate. Recent vandalism at the Coal Mines campground on the Tasman Peninsula highlighted this problem. The Tasmanian Parks and Wildlife Service presence had been reduced in the locality in part to have more staff at Seven Mile Beach to better address wood hooking problems in reserves around Colebrook. More on ground staff are clearly required – although that is only part of the answer – better regulations and more work building community appreciation of the parks values will also make a difference.
- Extension of Conservation Principles to Private Lands. It’s also recognised that conservation reserves and other conservation management practices on private land are an essential part of the mix. The TNPA would encourage the government to support the newly emerging mechanisms and market for protecting private land with conservation covenants.
- Need to be pro-active. With a growing population and economy and changing demands for reserves it is critical that they are proactively planned with an effective management regime including management plans for all reserves. Currently Tasmania does not have management plans for all reserves. This leads to reactive management which rarely delivers best results.

e. The record of governments with regard to the creation and management of national parks, other conservation reserves and marine protected areas.

- Tasmania has a large terrestrial reserve system with National Parks covering approximately 30% of the state’s land area and with a further 10% of the state afforded some protection status. This is a commendable quantity, as would be expected given Tasmania’s unique natural and cultural heritage.

- Despite this, the achievement of management objectives for reserved areas in Tasmania is presently under threat from inadequate levels of funding. This has been clearly identified in the State of the Tasmanian Wilderness WHA report, released in October 2004. Under Proposed Action 1, “key stakeholders identified inadequate resources for management and the uncertainty surrounding future funding as key actors that had limited or threatened overall management performance for the TWWHA over the 1992-1999 period. For example, there were insufficient funds to allow for full implementation of the statutory 1992 management plan during its term, and the uncertainty surrounding future funding levels raised concerns regarding the continuity of many management programs for the TWWHA.” (p228) The TNPA urges both State and Federal governments to take all measures possible to secure funding to secure the adequate implementation of the current management plans for all reserves so as to ensure achievement of associated management objectives.
- Whilst the current management prescriptions for many reserves are technically sound, the TNPA is concerned over a lack of political commitment to adhere to these prescriptions. Indeed, the State of the TWWHA Report identified this as one of the key factors limiting or threatening management performance (p. 194). The amendment to the 1999 TWWHA Management Plan to allow the proposed development at Cockle Creek East is a case in point. In order to improve this situation it was recommended that “Tasmanian State legislation for National Parks and reserves be amended to reflect the international obligations of management of World Heritage Areas under the World Heritage Convention, i.e. to identify, protect, conserve, present, transmit to future generations and, if appropriate, rehabilitate the World Heritage values of the property” (Proposed Action 4, p229).
- Management plans for Australia’s World Heritage Areas must be made to comply with Federal *Environment Protection and Biodiversity Conservation Act 1999* and the associated Regulations, including the management principles that establish a standard for management plans for World Heritage Areas. For example, the 1999 Tasmanian Wilderness WHA management plan (which was developed prior to the EPBC Act coming into force) does not fully comply with the principles set out in the EPBC Regulations.
- Furthermore, many conservation organisations argue that there are still significant areas of the state with high conservation values that are not or inadequately protected. Many of these are smaller areas of old growth, and in some cases world heritage value, forests that are still in state forest or on private land. While some high conservation value forests were protected in the Community Forest Agreement announced in 2005, other forests identified by the Tasmania Together process pursuant to wide community consultation, have not yet been protected.
- A number of areas within the current reserve system should be made into National Park giving them a higher level of protection and in recognition of their values. Such areas include the Tarkine reserve and many small forestry reserves adjoining existing national parks. Given that the Tasmanian Government’s own publicity ‘A way forward for Tasmania’s forests’ recognises the Tarkine as “the last large area of cool temperate rainforest in the world” and as being “significant on a global scale” one needs to ask why the Government has not conferred the highest level of conservation protection on this area. Instead, the Tarkine, which contains the habitat of about 50 rare and endangered species, including the wedge-tailed eagle

and the giant freshwater crayfish, remains threatened by mining and other forms of development. Only by conferring national park status on the Tarkine and nominating it for World Heritage Area listing can the area be fully protected, as promised in Government publicity. For similar reasons, the TNPA also calls on the State Government to confer national park status on the forests reserved in the Styx Valley.

- Additions should be made to the boundaries of the Tasmanian Wilderness World Heritage Area (where there are areas of world heritage value outside the TWWHA) to fulfil Australia's obligations under the World Heritage Convention.
- The record of governments regarding marine protected areas, particularly in Tasmania is inadequate and has been referred to above. If the long awaited marine protected areas ultimately established in the South East Region (then elsewhere around Australia) produce mere 'paper parks', inadequate to properly achieve the goals of marine planning and to meet Australia's international commitments, then we do no favours to biodiversity, future generations or hopes for a sustainable fishing industry.
- Currently no Australian State (except the ACT) has fulfilled its obligations to establish ecologically representative freshwater protected areas, and urgent leadership is now required by the Australian government (see "Kingsford Statement" at www.onlyoneplanet.com.au).