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**Submission to the
Senate References Committee Inquiry
into
Australia's National Parks, Conservation Reserves
and Marine protected Areas**

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Index

Background 3

General comments 4

Specific comments

Values and objectives 5

Funding and resources 6

Threats 7

Responsibilities 8

Record of performance 11

Possible improvements 11

Conclusion 12

List of Attachments 12

Background

We are the peak body for four wheel drive owners/operators in Australia and as such we represent every four wheel driver whether a club member or not. This includes the many hundreds of thousands of people who participate in touring, camping and other outdoor activities on public land. The nature of our members' activities is largely based on use of public land including national parks, conservation reserves, State parks, State forests and marine parks. This submission attempts to address the management of the national estate of parks and reserves based on the terms of reference stated in the inquiry document.

This submission does not seek to address the issues concerning marine protected areas as our members' activities are essentially land based, although often the same management policies and practices are applicable.

We understand the significance of the management plan process as a means of regulating behaviour, however, we also believe in self-regulation and while we accept that there are some who don't do the right thing, we believe that it is better to educate these people as forced compliance has never achieved a successful outcome.

The Council has a policy of encouraging greater personal awareness and has formulated several codes of conduct including one for off-road driving of four wheel drive vehicles, and another for vehicle based camping. A copy of the codes is attached for reference.

It should also be noted that some of the State member associations have entered into Memoranda of Understanding with the land management authorities in their state in order to ensure greater user participation in the management process. While we view these agreements seriously, it is clear that some land management authorities selectively choose when they want to abide by the agreements and when they do not.

We also understand the perceptions of some people with regard to the "social acceptance" of four wheel drive vehicles, however, we believe that other people have sought to portray law abiding citizen's vehicles as something other than what they are – legally allowable means of transport, which in our case allows us to visit and enjoy the many remote areas of our national estate.

General comments

We propose the basic premise that the national estate of public land is for the benefit of the people, both now and in the future.

We further propose that all people should be able to participate in the use of public land.

On the basis of these propositions, we believe that those responsible for the national estate have the obligation to ensure that public land is managed equitably for the current users while also ensuring that those facilities are sustained into the future.

Unfortunately, there is much evidence to show that the management policy of many land management authorities consists of closing areas or at least significantly reducing access to parks and reserves. Regardless of the reasons behind this policy, there is overwhelming evidence to demonstrate that the lock it up style of management is not a viable option – rather it denies people equitable access to the national estate while simultaneously ensuring that the natural resource becomes unsustainable in terms of future visitor expectation.

National Heritage listing is intended to protect items or areas of national significance however the value of the list is being undermined by the inclusion of things which have little or obscure heritage significance. In terms of the national estate it appears that heritage listing is little more than a means of adding to the area under management and then not being able to manage it due to the restrictive conditions regarding change imposed by the listing.

Recreation is generally undervalued and under funded by governments until statistics are used to demonstrate perceived poor governance. The Life Be In It campaign was a classic case of promoting the use of the great outdoors as a healthy alternative, and similar campaigns are appearing now after the release of the latest obesity statistics. It is therefore interesting to note that while a growing population is being encouraged to undertake a healthier lifestyle, the growing area of parks and reserves under management is effectively shrinking under restrictive management policy.

Specific comments

Values and Objectives

The terms of reference of the inquiry include the values and objectives of Australia's national parks, other conservation reserves and marine protected areas.

The goal of the National Reserve System Program is:

- to assist with the establishment of a comprehensive, adequate and representative system of protected areas to conserve Australia's native biodiversity.

The NRS will aim to contain samples of all ecosystems identified at an appropriate regional scale. It will also consider:

- the ecological requirements of rare or threatened species and rare or threatened ecological communities and ecosystems, in particular those listed in the *Environment Protection and Biodiversity Conservation Act 1999* and other State, Territory and local government legislation or policy instruments; and
- special groups of organisms, eg. species with specialised habitat requirements or wide-ranging or migratory species, or species vulnerable to threatening processes which may depend on reservation for their conservation.

Source: DEH website

If the above goal defines the objective that land management agencies use in management planning then their actions should reflect attempts to maintain the environment in as near as possible identical condition so that habitats and species can remain sustainable. Clearly, this is generally not the case as is evident by the significant increase in noxious weed and plant infestation area and feral animal population growth.

It is also clear that these environments require proactive management regimes in order to remain in essentially the same condition as nature continually changes environments in response to various influences.

Given that these environments could be maintained in this condition, what value is placed on them and to whom are they valuable?

There is no doubt that the preservation of ecosystems and species has intrinsic value, however those that see, participate in and enjoy these environments gain real value from the experience. Therefore these managed environments are valuable to the users and are closely aligned with the value of their recreation.

One of the key objectives of the national estate is to preserve environments for the benefit and enjoyment of current and future generations. Access to many parks is becoming severely restricted due largely to politically expedient arrangements with green groups that do not reflect the mainstream population. These groups promote the exclusive walkers only policy at the expense of public equity where only the fit and healthy can enjoy the national estate. Surely, this limited access does not meet the objective and only decreases the value of the national estate to the greater population.

The current management of the national estate affects the future value of the environment for the next generations. As the visual appeal of environments deteriorates due to lack of maintenance so too does their value to the users. Unless reversed this has an ongoing effect on the future value and therefore meeting the NRS objective.

The conversion of “useless” (little or no heritage value) land into parks such as old cattle stations in remote areas adds area to the national estate but does not add value. Rather, these additions not only put more demands on the same resources, but often divert needed resources from other more deserving causes. There is little sense in creating new parks when the current ones cannot be managed properly due to a lack of resources.

Funding and Resources

There is no doubt that governments are not providing sufficient funding and resources to meet the NRS objectives and their management requirements despite increasing the area of the national estate – often parks are increased in size with little or no increase in manpower or funding.

This declining level of manpower resources for parks and reserves is highlighted by the increase in area each field staff person in Victoria is expected to manage as shown in the following table.

Year	Number of National Parks	Area of National Parks (ha)	Total employees	Field staff with Managers	Hectares per employee	Hectares per ranger
1983	30	985,643	387	272	2546	3623
2005	39	3,235,249	1021	396	3168	8170

Source: Parks Victoria annual reports

In New South Wales the figures are dramatically worse as shown below:

Year	Number of Parks & Reserves	Area of Parks and Reserves (ha)	Total employees	Field staff including Rangers & Area Managers	Hectares per employee	Hectares per field ranger
2005	600	6,450,000	1401	897	4,604	25,195

Source: DEC Annual Report 2004-05

In addition to the low manning levels, several factors also affect the operational effectiveness of the manpower provided:

- There can be a vast difference in administration structures within land management agencies resulting in disproportionate manning levels of on the ground staff versus office staff. This can be clearly seen in the Victorian figures above.

- The parks with high visitation numbers or those close to main centres often have a disproportionate number of field staff which therefore leaves the remote parks even further under staffed.
- There is a significant amount of time spent by field personnel away from the day to day operational duties due to meetings etc.

Funding for the national estate is derived from many sources and there are numerous examples of money being used inappropriately or not enough money being applied including:

- The cost of excessive management staff as highlighted in the Victorian statistics above. The funds applied in 1983 were \$11.1 million which equates to \$40,808 per ranger, whereas in 2005 funds applied were \$67.1 million resulting in a cost per ranger of \$169,444. Clearly there is a significant overhead cost due to the office based staff.
- The National Heritage Trust provides grants for environmental projects and lists these on their website. There are many projects on the list where property owners have received grants that do little but beautify a small area for the benefit of local residents only. In addition, many grants include money for livestock fencing which surely should be the responsibility of the stock owner.
- The national estate is being overrun by noxious plants and feral animals as acknowledged by various ministers however the funding applied to this major problem is nowhere near enough to make any real difference. The minister states in the attached media release (Media release 04360wt.pdf) that feral animals cost Australia over \$500 million per year in lost agriculture production, however he and the NHT are only going to contribute \$854,000 over 18 projects.

Despite being an inexpensive source of manpower, not enough use is made of volunteers. In many areas our clubs have taken on rubbish cleanups, track clearing, weed removal and minor track maintenance as a way of participating in the management of our parks. In some areas there is a resistance to the use of volunteers and arguments such as insurance liability are used as a reason to stop volunteer field work. Land managers need to encourage user participation at all levels of management of the national estate as it represents a win/win outcome.

Threats

Despite what some people say about 4WDs, horses and cattle etc, the most serious threats to our national parks and other conservation areas are:

- Noxious weeds – blackberries, lantana etc are prevalent in our parks and little or nothing is being done to halt the spread of these weeds. Refer to Senator Macdonald's comments on the Bitou bush infestation in coastal areas shown below.
- Feral animals – rabbits are destroying the natural vegetation providing the intrusive species with the opportunity to further encroach into our parks. In addition foxes and wild dogs & cats are threatening the existence of some natural species to the point where some are facing extinction. Refer to Media release 04360wt.pdf attached.
- Bushfires – the greatly reduced or lack of bushfire prevention measures such as fuel reduction burning have resulted in many of Australia's parks being destroyed by bushfires. The ferocity of the bushfires over the recent summers is evidence that this vital management function is not being addressed. The possibility of litigation against land

managers for fire damage may arise as it appears that fire management is largely reactive and left to rural fire services around the perimeter for the protection of adjacent property.

- Green exclusionist management theories – the theory that an area can be described as wilderness, locked up and left to return to pristine condition is a total misconception. The reality is that the weeds and feral animals will continue to destroy the native flora and fauna, while the fuel load increases for a bushfire. Unfortunately, the only thing that gains from these bushfires is the weeds as they regrow and spread more quickly before the native vegetation.

Source: DEH media release 19th October 2005

Senator Macdonald highlighted a \$1.575 million project that will decrease the impact of bitou bush on threatened coastal plain communities at 25 key sites along the NSW coastline.

"Bitou bush is listed as a Weed of National Significance and is one of the greatest threats to coastal ecosystems, infesting approximately 80 per cent of the NSW coastal zone.

"This invasive scourge has put 150 plant species, two plant populations and nine endangered ecological communities at risk of extinction," Senator Macdonald said.

Responsibilities

The responsibilities of governments with regard to the creation of national parks and other conservation areas can be considered in the light of the following principles advocated by the National Heritage Trust

All Trust investments are guided by the following decision making principles:

1. The focus will be on high priority actions, that is, on carefully targeted investments that will contribute significantly to natural systems, sustainable production and biodiversity benefits for Australia.
2. Actions that maintain natural systems and biodiversity to deliver both environmental and production outcomes are preferred over remediation, as they return far more benefits per dollar invested.
3. Priority will be given to supporting activities with the greatest public benefit, measured both directly and indirectly including the contribution to environmental/social/economic outcomes on private land for the public good.

Source = www.nht.gov.au

According to principle number 1, government land management authorities have the responsibility to prioritise land acquisition to ensure that new parks contribute significant benefits as an investment that grows in value. The creation of new parks based on the statistically calculated under representation of a region in respect of the amount of park area held in comparison to other regions is therefore in stark contrast with this principle, but occurs

regardless. In addition, governments have the responsibility to ensure that parks do not get created where this is insufficient funding and resources available to appropriately manage the area in accordance with a detailed resource requirement plan.

The act of maintaining natural systems in preference to remediation works as noted in principle number 2 presupposes that when a park is created to maintain a natural system the intent is to continue that maintenance to ensure its sustainability. This intent acknowledges that it is far more cost effective to manage the park effectively on an ongoing basis than it is to save an area that has been neglected. Government land management authorities therefore have the ongoing responsibility for maintaining parks that they create, and in addition remediating those that they manage poorly. Unfortunately the lack of maintenance of much of the national estate reflects a non-adherence to this principle resulting in the need for remediation on a large scale as evidenced by the NHT grants scheme.

Principle number 3 is based on public equity where priority will be given to supporting activities with the greatest public benefit. This therefore entrusts land management authorities with the responsibility of providing fair and equitable use of the national estate to all users. Unfortunately, there are many instances where political expediency has resulted in policies which limit access to a minority in contrast to this responsibility.

The responsibilities of governments with regard to the management of national parks and other conservation areas are outlined in the management plan process. The federal Department of Environment and Heritage defines the requirements for management plans as follows:

Management plans

Each protected area has a Management Plan created using the collective knowledge of traditional owners, the community and relevant stakeholders to determine the way ahead. A Management Plan must:

- assign the protected area to an IUCN [protected area category](#);
- state how the protected area and associated issues are to be managed;
- state how natural and cultural features are to be protected and conserved;
- allow for the Director of National Park 's obligations under leases;
- specify limitations or prohibitions on what the Director or anyone else may do in relation to the area;
- specify any operations or activities that may/may not be carried out;
- indicate generally the activities to be regulated or prohibited and how this will be done; and
- indicate how the plan takes into account relevant international agreements.

Source: DEH website

While the above lists general requirements it does not specifically address the need for resource allocation critical to the management responsibility.

In general, management plans have the following shortcomings:

- There is no resource allocation plan within management plans resulting in planning statements that have little possibility of providing a sustainable outcome. Because management plans are generally written after a park is created, the responsibility for ensuring that resources will be available rests with those proposing creation of the park and a resource requirement plan should be included in the proposal.
- There is usually data on the naturally occurring animals and plants that need to be protected, however the data on introduced species is rarely included. This indicates that the impact that the introduced species are having or will have on the natural species is not being considered and therefore not allowed for in resource planning.
- As noted above, threatening species are rarely noted however recent management plans used the phrase “likely to contain” with reference to threatened species indicating that the data is unavailable, inaccurate or there may be some other motive behind creating a park based on the possibility of a threatened species.
- Fire management planning is not usually included in plans. The possibility of litigation against land managers for fire damage may arise as a result of a lack of fire management planning as this is a prime responsibility under creation principles 2 & 3 as well as planning point 3.

Government land management authorities therefore have the responsibility to prepare detailed management plans that address all of the issues including funding and resources for control of introduced species and fire management. In addition, the plans must contain detailed review and audit procedures in order to ensure that the responsibilities are being carried out.

Record of Performance

The record of governments with regard to the creation of national parks and other conservation areas is highlighted by the increase in number and area of parks under the national estate. While the increase in parks may seem to indicate good performance, there are parks being created with little or no heritage value and little or no resources available to sustain them.

The record of governments with regard to the management of national parks and other conservation areas is generally poor due to:

- Under funding as highlighted above
- Funding allocated to minor remediation projects instead of major national projects that would benefit all parks and conservation areas.
- Under staffing as highlighted above
- Under maintenance as shown by the continued increase in feral animal count, noxious weed infestation and bushfire fuel loadings. The level of performance in this area highlights an obvious disregard for the principles associated with the creation and management of parks and conservation areas under the national estate.
- Limited access to users due to restrictive management policies which are often initiated by politically expedient alliances
- Poor use of user organisations in participative park management which has proven successful in other countries
- Adoption of a “lock it up” management approach which ignores a proactive management policy – the introduction of “wilderness” as a management approach has resulted in the worst possible outcome for the national estate.

Possible Improvements

We propose that our national estate is best served by participative management between land management authorities and those that use and care for parks and other conservation areas. We see governments pander to “green” groups with the apparent disguise of being conservationists for political expediency; however we do not believe that these groups have the long term interests of the national estate at heart as they speak volumes but fail to deliver any “on the ground” outcomes.

In this regard, our members have demonstrated on numerous occasions that we practise what we preach by voluntarily performing rubbish clean-ups, track clearing, weed removal and minor track maintenance. Our members have gladly volunteered to assist with feral animal and weed eradication programs however these programs have faltered through liability and unionist concerns raised by those not interested in being part of the solution. We have undertaken these projects because we want to enjoy the national estate in its best condition now and into the future.

There is a strong case for the re-introduction of bounties for feral animals as a way of culling numbers and gaining control over increasing populations. The benefits of a managed program would be significant without adding to the workload of rangers and field staff.

Conclusion

The Australian National Four Wheel Drive Council (ANFWDC) supports the proactive management of the national estate that ensures a sustainable future with equitable access to all.

The ANFWDC believes that the best way to ensure a sustainable future is by providing adequate funding and resources in combination with a fully managed approach that meets the objectives of the users.

The ANFWDC also maintains that the people who use the national estate must be allowed to participate in the management process from the outset rather than as a reaction to a management plan drafted by a desk bound planner. Only in this way will the objectives of the legislation be met.

We thank the committee for the opportunity to participate in the public submission process and look forward to having our submission viewed with the insight that our involvement in the issue brings. We would welcome the opportunity to discuss our submission in further detail at one of your deliberative meetings, and would be pleased to travel to Canberra to do so.

Attachments

Code of conduct – off road driving

Code of conduct – camping

Media release on feral animals