

**National Parks Association of the ACT**  
**Submission on Namadgi National Park draft Management Plan**  
**November 2005**

**Introduction**

The National Parks Association ACT welcomes this opportunity to help plan for the management of Namadgi National Park in the coming decade. Our submission begins with the basic premise that the primary purpose of national parks, and of Namadgi in particular, is the conservation of its natural values. We envisage this new management plan will establish a long term framework for the conservation and protection of the flora, fauna, landscapes and ecosystems which Namadgi contains.

Many thousands of people every year use the park to enjoy its natural values, its landscapes and the peace and solitude which it provides. As our world becomes more frenetic, noisy and crowded, it will become an even more important sanctuary and refuge for us all. A key principle of our submission is that Namadgi is not a place for competitive games, for large crowds, for noisy or intrusive activities. Namadgi needs to be respected as a place of nature, of wilderness and of seclusion. It also needs to be valued as an ark which will carry what we may preserve of our native plants and animals into an uncertain future.

The main challenge for Namadgi lies in the impact of climate change which it will experience over the next few decades while it continues to recover from the 2003 fires. The prospect of high impact fire management strategies which will compound the effect of this climate change is an unpleasant one. We submit that there are many better, less expensive and more effective strategies for managing fire, both natural and planned, than some of those outlined in the draft plan. We have to work smarter in the coming years; we have to keep ahead of the challenges, not relying on outdated 20<sup>th</sup> century technology in a new and uncertain future.

There will be increasing pressure for high impact recreational activities such as 4WD and horse riding as Canberra grows. Park management needs to be firm that everybody is welcome to enjoy being in Namadgi, but that they may have to leave their noisy vehicles and their competitive sports attitude at the gate. A national park is a place for low impact recreation, peace and solitude.

Over the next ten years, it is safe to predict park management will be expected to do more with less, to raise funds independently of the ACT Budget process and to market and possibly even commercialise some activities in the park. Even as the draft plan goes out for consultation, staff cuts and cost reductions in critical programs such as fire management are being proposed.

It is important therefore, that the final management plan for Namadgi addresses the complexity of these challenges and competing priorities and sets out clear parameters for its conservation and human use so that our energies are not dissipated by misunderstandings. The draft plan is a good beginning but four main areas need to be worked on to make the final management plan an effective and workable document:

- We need more rigorous protection of existing wilderness areas and an extension of the wilderness classification and its protection into the Blue Gum Creek, Booth Range and Lower Cotter catchment areas.

- We need adequate and sustained funding for research, training and conservation strategies in order to ensure the natural assets of Namadgi NP are maintained or enhanced and to minimise the impact of climate change.
- We need to abandon the increasingly outdated concept of 'commercialism' as an income generator for national parks, not just because of its ecological impact but because of the growing evidence that the private profits made in national parks are actually taxpayer funded.
- We need to move away from the high cost, high impact fire management strategies proposed to date – for example low-loader roads through the wilderness, up steep hills and through remote and pristine areas – and develop clever, effective and low impact fire management strategies which build on the fire-resistant features of the bush, rather than destroy them.

All 302 members of NPA ACT feel a strong and very special connection to Namadgi National Park. Our organisation was formed in 1960 for the express purpose of creating "a national park for the national capital". Members lobbied politicians, carried out scientific assessments of the area's natural and cultural heritage, published books and pamphlets on its flora and fauna and conducted extensive media and public education campaigns for 24 years to achieve this. When the park was finally declared in 1984, members turned their attention to preserving and enhancing its natural values and those of its neighbouring conservation areas.

Walking, camping and photographing in the park, sharing it with family, friends and visitors, all have become a regular and necessary part of our lives. Each of us could nominate a long list of locations within the park with special meaning for us. Places such as Mt Kelly, Mt Clear, the upper Cotter Valley, Gudgenby, Orroral and Honeysuckle valleys, Booroomba Rocks, Mt Ginini, Mt Franklin carry lovely memories, family legends and special experiences. We want them to remain pristine and unique, for the enjoyment of future generations.

NPA ACT members also have a long history of working on the park's infrastructure and natural environment, to better protect and preserve its cultural and natural values. As far back as 1981, members began work to restore Orroral Homestead to its current glory. We are responsible for maintaining Yerrabi Track and Demanding and Horse Gully huts. We take part in regular work parties in the park, for example the Gudgenby Bush Regeneration program, the Alpine Walking Track, river and bog monitoring and weed reduction programs; and we produce and market books and guides to help people appreciate the flora and fauna of the area.

The primary purpose in establishing Namadgi National Park was for nature conservation. The first priority of this management plan should be "to maintain and improve the natural and cultural values of the park for future generations". This is the first principle to which the plan should refer when conflicts arise between the different uses of the park. We are disappointed that this is not more clearly articulated in the draft plan. The plan currently lacks any such clear statement of purpose, merely including nature conservation within a list of various other purposes for which the park is currently used: e.g. to collect water, manage fire and enjoy recreation opportunities.

It is not acceptable, in our view, to leave open vague possibilities which theoretically can be resolved further down the track. In the face of climate change, it is foolish to assume a level of robustness in the park's ecosystems upon which we can rely. An arid, degraded and pest-prone park may be the price of our failure over the next decades.

In addition, given that it has taken some time to develop this draft plan and that it may be some time yet before it becomes operational, we seek a commitment that there be a moratorium on any approvals for work or activities that would conflict with the potential commitments in the final plan. For example, there must be no upgrading of fire trails or planning work done on new trails. There must be no leases or commercial agreements entered into, eg with Outward Bound, nor new uses of facilities, eg Gudgenby Homestead.

The following section of our submission outlines what needs to be added to the management plan to better protect our national park. The remainder of our submission contains discussion of the ideas, concepts and statements in the text and specific recommendations to improve the workability of the management plan.

## Part A: What needs to be added

### Wilderness

We recommend that three additional areas be given wilderness status under the Nature Conservation Act in order to better protect the different ecological systems of the park, and to provide greater protection to the existing wilderness area. This is not a new idea. The House of Assembly Select Committee that inquired into the draft Tidbinbilla Management Plan in 1998 recognised that land of high wilderness quality (as illustrated by Australian Heritage Commission National Wilderness Inventory wilderness quality maps) existed both within the national park zone of Tidbinbilla Nature Reserve and adjacent parts of Namadgi, as well as in the Middle Cotter area, and recommended that the wilderness quality of these areas be protected from potential adverse influences.

Wilderness delineation work conducted by the Australian Heritage Commission in 1999 as part of the Commonwealth Wilderness Program identified two areas of wilderness in Namadgi - one centred on the Booth Range east of the Boboyan Road (of about 19,300 ha), that is larger than the semi-remote area proposed in the draft management plan, and one that includes but is very much larger than the existing wilderness zone west of the road (of about 67,300 ha, not including contiguous areas of wilderness in NSW).

These areas were identified as having high wilderness values using guidelines based on those used during the Comprehensive Forest Assessment-Regional Forest Agreement processes (the 'JANIS' criteria) in forests in south-eastern Australia to identify wilderness. The JANIS guidelines were approved by the ACT Government, but apparently were not used by the ACT Government to delineate wilderness in the ACT, despite a commitment by the ACT Government in the National Forest Policy Statement (1992) to do so (see process on page 10 of NFPS).

There are a number of problems with the existing wilderness system including:

- The wilderness zone identified on map 3 of the plan is much too limited in extent and is not representative of ecosystems in other areas of the park such as the Booth Range.
- The existing wilderness boundary is sub-optimal because much of it is in straight lines that are not easily identifiable on the ground and do not follow either natural features such as catchment divides or creeks, or constructed features such as roads or 4WD tracks.
- The National Capital Plan states that the land between the wilderness zone and the Boboyan road should be managed as a buffer to protect the wilderness (see page 105 of Appendix G, policy statement D.2, D.3 and D.4). It has been clearly established through numerous wilderness identification studies over recent decades that any area required as a buffer to a wilderness core should be included within the wilderness itself. Examples include:
  - Victorian Land Conservation Council Wilderness Special Investigation, Final recommendations 1991 page 17: 'Unless otherwise impracticable, all areas requiring specific management to maintain or enhance wilderness quality should be included within the boundary of the designated protected area. That is, in most instances, any buffer required to protect the areas of highest wilderness quality should be included within the protected area boundary.'
  - Commonwealth Wilderness Delineation Program Wilderness Delineation Guidelines (1998): 'Boundaries should be located to include allowance for

buffering of areas of high wilderness quality from activities that may adversely affect wilderness quality.'

- Technical wilderness identification studies such as Helman et al (for NSW) and Feller et al (for Victoria).
- The wilderness zone proposed in the plan (Zone 1A) is only 28,150 ha, less than half of the area identified as wilderness by the Australian Heritage Commission. The Blue Gum Wild Semi Remote area (part of Zone 2A) is less than 3,000 ha and the Booth Range Wild Semi Remote Area (other part of Zone 2A) is less than 9,000 ha, also less than half the area identified as wilderness by the Australian Heritage Commission. Even allowing for works conducted since the 1999 Commission wilderness delineation, such as tracks bulldozed during January 2003 fire fighting, the Wilderness and Wild Semi remote zones proposed in the plan are considered to be far too small to adequately encompass and protect the wilderness values and wilderness quality present in the park.

**Recommendation 1: It is recommended that the existing wilderness zone be expanded as shown on the map supplied as part of this submission to include parts of the Middle Cotter, western portion of the upper Orroral River catchment west of Smokers Trail, and lands bordering the eastern part of the current wilderness zone up to existing fire trails further south such as Old Boboyan Road and Grassy Creek Fire Trail.**

- This would significantly expand the wilderness zone to about 50,300ha, without adversely affecting existing recreational activities which are not acceptable within wilderness, such as mountain bike riding, horse riding and bushwalking in large groups.

**Recommendation 2: It is also recommended that the Blue Gum Wild Semi Remote area be expanded and upgraded to Zone 1A (wilderness), as shown on the attached map, to abut Smokers Trail, Bushfold Flats and fire trails, to an area of about 7,800 ha.**

- This would also not affect current recreational activities which are not acceptable in wilderness but would benefit low impact recreation values, wilderness values and biodiversity values by establishing a more robust area within which roadworks, new structures, and high impact recreation activities would not be permitted. At 7,800 ha it is larger than some wilderness areas identified elsewhere in the JANIS criteria and the Commonwealth Wilderness Delineation Guidelines.
- Although the Blue Gum Creek and Booth Range wilderness areas are at the smaller end of the scale of wilderness areas in south-eastern Australia, they are both larger than some of the areas of wilderness identified during the CRA-RFA process. Examples in eastern Victoria include: Upper Brodribb 5,300 ha, Tamboon 5,000 ha, Petrel 10,960, Buchan 12, 580 ha, Razor-Viking 15,700 ha. Formally gazetted wilderness zones in Victorian national parks also include relatively smaller areas, such as Sandpatch 15,600 ha, Razor-Viking 15,700 ha, and Genoa 19,400 ha.

**Recommendation 3: It is also recommended that the Booth Range Wild Semi Remote area be expanded and upgraded to Zone 1A (wilderness), as shown on the attached map, to the edge of surrounding fire trails and the Naas River or Bicentennial Trail (which crosses over the river several times), whichever is the westernmost, on the eastern boundary.**

- At 12,000 ha it is significantly larger than the minimum size for wilderness accepted by the JANIS criteria and the Commonwealth Wilderness Delineation Guidelines. Benefits would be as for the Blue Gum area described above.

**Recommendation 4: Restrictions on party size and use of campfires etc that relate to the wilderness/water catchment zone in the Upper Cotter may not be necessary in the Blue Gum and Booth Range wilderness zones. However prohibitions on the use of mechanised vehicles should apply to all three of the wilderness zones.**

#### **Climate change**

- There is inadequate reference to managing the park under climate change.
- Under climate change, ecosystems will change and become vulnerable eg. alpine meadows, herbfields and sphagnum bogs. Walking tracks will need to skirt vulnerable areas and their impact more closely monitored.
- Application of the precautionary principle should be referred to throughout the plan and directly applied to activities which, under the predicted climate changes, could escalate damage to the natural values of the park, eg some recreational activities, large group activities and overuse of some areas through commercial exploitation.

#### **Funding for research**

- There is inadequate commitment to appropriate funding or research especially for fire management and pest control.

#### **Inclusion of birds and invertebrates**

- There is almost no reference to birds, eg
  - the impact of too-frequent prescribed burning on birds due to the time required to build complex bird habitats;
  - the interrelationships of bird habitats in the park and in surrounding areas; and
  - there is no listing of bird species in the park.
- There is no listing of invertebrates found in the park.

#### **A community role in supporting the park**

- There is no reference to the responsibility of ACT lessees to behave as good neighbours to the park.

#### **Protection, maintenance and repairs to heritage sites**

- There needs to be a detailed plan, indicative costings and strategies for the management and conservation of heritage sites. For example, there should be a clear commitment to repair heritage sites such as Orroral Woolshed and an indication of where community groups have taken responsibility for management and conservation of heritage sites.
- Mt Namadgi stone arrangements and other Aboriginal sites are not listed as either Heritage or Interim Heritage sites and should be mentioned in the text.

#### **Public scrutiny of park use**

- There should be a general public register available on the internet of significant park use. This should contain listings of registered events with their group sizes,

routes and duration; of commercial uses of the park, again with duration, group sizes and routes; and of large group use.

- There should be public scrutiny of commercial decisions affecting the park eg commercial licences and special uses – if any – granted to commercial operators. This should take the form of a public register of licences, leases etc.

### **Implementation of the management plan**

- There should be a new section in the plan covering the draft implementation, evaluation and reporting mechanism for the plan. The much larger and more complicated management plan for Kosciuszko National Park is a good example of how priorities, indicative funding and implementation strategies can be set out in advance.
- There should be a public and transparent process for review and updating of the management plan on an annual or bi-annual basis. The cooperative management process should be rolled into this process.

### **Legislative/legal strategies required**

- The ACT government should negotiate Land Management Agreements with ACT rural lessees and other land managers, which promote a special role for rural areas adjacent or close to Namadgi National Park by:
  - Prohibiting grazing or cultivation of potentially invasive plants or animals, eg deer and olive trees;
  - Developing individual lease-specific land management strategies which protect areas of special interest eg yellow box redgum woodland adjacent or close to the park;
  - Making specific provision for co-operative fire management strategies and use of fire management resources;
  - Encouraging productive use of the leases which complement the park plan of management eg by providing services to park users and tourists; and
  - Making public those lease provisions which relate to land management strategies.
- Review and amend the Nature Conservation Act to:
  - Enable the appointment of an independent statutory Conservator who has no direct role in management of Namadgi National Park;
  - Reflect changes to other areas of the plan of management, eg use of permits, fees and charges and provide appropriate legal status for them.

## **Part B: specific comments against the text**

### **Preface**

The preface of a document is usually not the place where definitive statements are found. Therefore it is disappointing that this is where the prescribed management objectives of the park under the Land (Planning and Environment) Act 1991 are set out as the basic and inherent goals of the management plan. Burying such a key point in the preface means that the management plan fails to establish from the outset that the conservation of natural and cultural values is the primary purpose of the park.

Even so, this section confuses the issue further by its reference to “water as the primary value of the water resource catchments in the park” and does not discuss how the management plan will handle any conflict between the two statutory purposes. There is no point ignoring potential conflict in a document which should serve as the basis for practical strategies for resolving such conflict, should it arise.

**Recommendation 5: that the prescribed management objectives of the park under the Land (Planning and Environment) Act 1991 be repeated in section 1 ‘A new vision for the future’ and in Section 2 ‘Introduction’ as part of the first element on the ‘Statement of Significance’.**

### **SECTION 1: VISION**

We strongly support the management principles set out here, in particular the first three: precautionary principle, adaptive/experimental management and inter-generational equity. These principles offer the best hope for developing strategies which may protect the park as the effects of climate change and increasing human pressure become more damaging.

We would like to see this approach strengthened to establish formally and up front the underlying purpose of the park as the conservation of its natural values. There needs to be a cohesive, stand-out statement clearly stating the statutory purposes of the park as currently set out in the preface (see Recommendation 5).

We support cooperative management of the park but ask that consultation with the wider community be undertaken before agreement is reached between the parties, contrary to what is stated on p 8. Any consultation process after such agreement has been reached would be severely compromised.

**Recommendation 6: that there be community consultation on Joint Management Agreements before the parties have reached agreement.**

### **SECTION 2: INTRODUCTION**

This section is quite confusing. It refers to important issues set out previously in the preface section such as the legislation underpinning the park and the Australian Alps National Park. On the other hand, on page 1, (1.2 Background) it has neglected to recognise the work of NPA ACT in initiating the concept of a national park in the ACT; in lobbying over 24 years “for a national park for a national capital”; and its ongoing role in preserving and enhancing its natural values. Detailed information on this role is contained in the 40<sup>th</sup> anniversary supplement *NPA ACT Bulletin* March 2000 Vol 37 No 1, a copy of which should be in Environment ACT files. Both Sections 1 and 2 need to be rationalised and streamlined.

## **The Australian Alps National Park**

We strongly support the MOU between Victoria, NSW and the ACT for cooperative management of the relevant national parks within the Australian Alps National Park. We consider that this MOU needs to be strengthened to incorporate the principle that each jurisdiction should be establishing management strategies drawn from best practice across the parks.

**Recommendation 7: that Environment ACT proposes as a management principle to the Australian Alpine Liaison Committee that best practice management guidelines be established for all management jurisdictions across the parks.**

We have a number of other corrections for this section:

- The tone of this management plan is set by the order in which different values are listed and unfortunately 'economic' values tend to be listed first throughout the document. This is inappropriate in a plan for a national park. It is essential that, in order to reflect the true value of the park, 'economic' always be listed last throughout the management plan in terms of values! (First sentence p9)
- On the same note, the wilderness values of Namadgi should be listed before "archaeological fabric" and "beauty". Again, it is essential that the listing indicate to a reader where the importance of elements of the park lie to its managers. (p10)
- The descriptor for wilderness should also include "Areas of high wilderness quality within Namadgi form an integral part of the Bimberi Wilderness that extends into adjacent parts of Kosciuszko National Park, Bimberi Nature Reserve and Scabby Range Nature Reserve in NSW".
- There is no mention of Aboriginal sites of significance in this section, a key oversight.
- The sub-paragraph 'Other key historic themes' on p 10 which refers to the extraction of natural resources should not contain a reference to 19th and 20th century brumby running as this was not extraction of a natural resource but harvesting of feral horses.
- We would prefer that the order of strategic initiatives of the National Alps MOU (p 13) be listed in a priority order which reflects their true value to the park as in: "the adoption ... of a common terminology...The establishment of an Alps-wide scientific reference panel....The adoption of Alps-wide fire management principles..."

**Recommendation 8: That Section 2 be re-drafted to reflect the pre-eminent value of the park as nature conservation and to correct minor errors.**

## **SECTION 3: PARK ZONING**

The relationship between the zones and their conservation values is not clearly spelt out so that there is little discussion of what underlies the allocation of activity level to the different zones. Whatever the justification for group sizes of up to 400 being permitted in the Booth Range area, it is not articulated. In fact the sensitive nature of the area and the lack of information about its ecology are referred to and yet groups of up to 400 are to be permitted. We note that there is limited knowledge about Zone 2, Semi Remote, especially Naas Catchment. Information about the natural and cultural values of the Booth Range in particular is "extremely limited and therefore its values are unknown". In view of this, the precautionary principle (p.4, 1.4) must be followed.

We are concerned that zoning could become the de-facto dominant planning mechanism for the park, rather than simply a useful tool with inherent limitations. It does appear that recreation and not ecological factors drives the zoning mechanism, rather than the other way around. The reason for our concern is seen quite clearly in “Key values” for wilderness Zone 1A – Upper Cotter Catchment and Wilderness Area, in the table at the top of page 18, which refers to its high wilderness quality only in terms of its water and recreation uses rather than for its own sake and for inherent wilderness qualities such as minimal disturbance. This is a good example of the confusion and failure to sort out priorities throughout the draft plan.

Clarification and definition is needed for commercial and non-commercial groups. In all areas of activity it is becoming increasingly impossible to differentiate between for-profit and not-for-profit organisations and there can be no rational assumption that this classification actually reflects an organisation’s capacity to protect and care for the park in its activities. NPA ACT strongly believes that permits, licences and other strategies to ration or restrict park use should only be granted by public process to organisations and activities which best reflect the purpose of the park and its limited resources.

There are some elements we strongly support in this section:

- “Restriction on group size and overall numbers at any one time” for Zone 1A and agree with “No new overnight walking tracks” but query why Zone 1B: “Has potential for new walking tracks for day walks”. There needs to be specific information provided before such statements can be accepted because of the need for strict limitation of access to this area.
- We strongly agree with no Special Events for Zone 1A.
- We strongly agree that trail bikes and other powered wheeled transport should not have access to Zones 1 & 2 but request that this be extended to bicycles.

We have concerns about other elements:

- In view of the limited knowledge about Zone 2, Semi Remote, especially Naas Catchment and Booth Range, all activities should be restricted to the same level as that of the Cotter wilderness area . Information about the natural and cultural values of the Booth Range in particular is “extremely limited and therefore its values are unknown”. In view of this, the precautionary principle (p.4, 1.4) must be followed.
- The reference on p 19 to “it provides an important recreation asset for pursuits and events that **require** a remote setting” in “Zone 2A Wild Semi Remote” is very confusing. What pursuits and events *require* a semi-remote setting but are not suitable for Zone 1A? This appears to be some sort of code and we must ask why the draft plan cannot specify these pursuits and events so that their requirements can be openly discussed.
- We query where it would be appropriate to place picnicking and sightseeing facilities in Zone 1A which could have very real impact on its wilderness qualities, as set out in the table on pp 20 - 23.
- We object to the proposal on p20 that “management trails may be upgraded” under 1A and 2A and 2B. At what point does an upgrade become a new road? Unless the level of upgrading is restricted to meet wilderness requirements, upgraded tracks become too easily accessible to vehicles and reduce the wilderness quality and values that these zones seek to protect. Upgrading management rails reduces

wilderness values and wilderness quality and should not be permitted in zones 1A, 2A and 2B.

- We strongly object to the proposed extension of cycling into the wilderness. It should be deleted from Zone 1A.
- We object to the potential for commercial use of overnight accommodation at Gudgenby homestead. There should be no overnight accommodation allowed at Gudgenby Homestead except for parks ACT rangers on active duty.

**Recommendation 9: that Section 3 be modified to make clear the pre-eminence of conservation and the limitation of recreation activities to those areas where such activities would not impact on those values.**

**Recommendation 10: that Section 3 also be amended as follows:**

- Add to last dot point of Background on p17 “and where wilderness quality is high”.
- More clearly define the type of “low impact activities” referred to under Recreation in Zone 1.
- Remove the reference to permitting “Utility structures” on p 21 in zones 1A, 2A, 2B as such structures significantly reduce wilderness values and wilderness quality.
- Delete references to permitting memorial plaques.
- Delete reference to permitting cycling in the wilderness area.
- Apply a uniform permit system to manage access to camping, not just in Zone 1A but also in other zones.
- The use of Zone 2 areas is restricted to similar conditions for Zone 1A. (See below, comments on Wilderness).
- Zone 3 Roaded and Recreation should only extend 10 metres from the centre of the road, not 40 metres.
- Apply a system whereby permits, licences and other strategies to ration or restrict park use be granted by public process to organisations and activities which best reflect the purpose of the park and its limited resources.

## **SECTION 4: WATER**

We are concerned that this section of the management plan does not establish adequate links between high conservation values and maintenance of a high standard of water quality. The Strategic aim needs to make clear that the best protection of Canberra’s water supply relies on the highest standard of conservation of the area’s natural values. This can be done simply by adding “whilst maintaining the highest conservation values consistent with a National Park.”

The Background in this section contains very valuable information but again, the paragraph headed “Legislative requirements for catchment management in the ACT” on p 27 does not adequately explore the relationship between protecting conservation values and effective water catchment management and conservation of biodiversity. Nor does it set up any process for resolving potential damage to the biodiversity of the area, eg by strategies designed to reduce fire risk but which actually cause further erosion. Past history of water catchment management in Kosciusko National Park serves as a timely reminder that extensive damage can be done by inappropriate interventions with the best intentions of preserving water catchment quality.

We suggest the following amendments or inclusions:

1. There should be a strong statement in this section that potentially damaging activities, eg fire management strategies, can only be contemplated after rigorous scientific study establishes that they will not negatively affect the natural values of the area.
2. The paragraph at the bottom of p 25 should be amended to read: *In 1960 the National Parks Association of the ACT was formed to lobby for the establishment of a national park for the National Capital and in 1963 presented a .....*
3. The 3rd paragraph p 27 should be amended to read “high value wetland systems, *conservation of threatened species of fish and frogs and ...*”
4. NPA ACT is pleased to see that Objective 1, p 33 clearly recognises that catchment management practices must be consistent with the conservation of the natural environment. However, this statement should be echoed in the following strategies.

### **Objective 1: catchment management activities satisfy statutory requirements... and conservation of the environment**

Strategies 1.1 – 1.3: we support.

### **Objective 2: Catchment management has effective planning ...**

The statement: “and in conserving the natural values of the park” should be added to this objective

Strategies 2.1 - 2.2: we support.

### **Objective 3: Stream hydrology is protected ...**

The statement “and in conserving the natural values of the park” should be added to this objective.

Strategies 3.1 - 3.14: we support, though we note that:

- there are inconsistencies and unresolved conflicts in the strategies eg, it is not made clear what will happen when the adverse impacts of planned fire on the hydrology and water quality of the catchment is understood and documented. Will planned fire activities then be suspended?
- Strategy 3.10 could mention that sheet erosion and landslides are examples of threats to catchment hydrology.
- Strategy 3.14 should give guidance on how to minimise impacts e.g. such dams should be fenced off to prevent animal access, they should be lined with an impermeable membrane so they are safe from piping failure, and any temporary weirs and unsightly plastic pipes should be removed when not in use.

### **Objective 4: Monitor environmental flows**

Strategies 4.1: we support though we suggest

- rewording the strategy: “Monitor environmental flows continually to ensure compliance with the Water Resources Act 1998 and report publicly at quarterly intervals.”

### **Objective 5: Water quality and recreational use**

Strategies 5.1 - 5.7: we support strongly, particularly the exclusion of vehicles from the wilderness area.

- However, NPA ACT does not support Strategy 5.1's reference to recreational development within the catchment.

### **Objective 6: knowledge and skills in catchment management**

6.1 - 6.8: we support, though

- Strategy 6.2 should include the words "and reporting after baseline monitoring".

### **Objective 7 Staff training and skills in water resource management**

Strategies 7.1 - 7.2: we support

### **Objective 8: effective partnerships (for water resource management)**

Strategies 8.1 - 8.4: we support, though we note that:

- there is no reference to the responsibilities of ACT lessees in the Gudgenby/NAAS catchment and this should be added.
- Strategy 8.4 should have the words "and biodiversity" added.

## **SECTION 5: NATURE**

We consider that the zoning framework applied to the park exposes the fragmentary nature of the wilderness and remote areas in the park. The boundaries of Zone 1A and 1B appear arbitrary and do not reflect the topography or ecology of the area. The zoning arrangements expose the isolation of Zone 1B areas - Blue Gum Creek and Booth Range - demonstrating the haphazard planning to date for protection of their natural resources. Our proposal to extend wilderness protection status to the Blue Gum Creek, Booth Range and Lower Cotter catchment areas is outlined earlier in this submission.

The concept of wilderness as outlined on pp 66-68 needs to state that the wilderness in the western part of Namadgi is contiguous with and forms part of the Bimberi Wilderness in adjacent NSW. Management of this area must have as one of its prime objectives the protection of the wilderness quality and values of this combined wilderness area consistent with the commitments in the MOU on the Australian Alps, to which the ACT Government is a signatory.

There should be stronger recognition in the plan that inter-generational equity (p 5) requires the need to preserve wilderness for its own sake and not just a 'wilderness/solitude experience' for the current users.

The proposed arrangement for the Conservator to allow mechanical access (bicycles and cars) to wilderness is not acceptable. The Conservator should be a statutory appointment, independent of park management and there should be no private mechanical access to wilderness areas. All management activities within the wilderness area should be undertaken in park vehicles.

We note in particular that the Nature Conservation Act specifies that "no new trails should be permitted in wilderness areas". We endorse this and urge that the Act be adhered to.

NPA ACT supports proposals to do scientific research in the park that will lead to a better understanding of the natural values of the park and better ways to manage it. We therefore applaud the proposal (p 43) to do a systematic soil analysis of the whole park consistent with the studies done in the Mt Clear and Booth Ranges. However, we note that it is not included in specific strategies, which underlines the weakness of this management plan in providing specific strategies to manage the park.

Amendments to this section should include:

1. In paragraph 3 p 41 change “volcanic” to “magmatic”.
2. We note the importance of reducing soil runoff and erosion in the catchment as outlined on p 45 and submit that maintaining a litter load of no less than 10t/ha should be adopted across the whole park. We note that the prescribed burning regime for the park, as outlined in the Strategic Bushfire Management Plan, proposes much lower litter loads even as low as litter bed height of 25-35 mm for native forest and shrubland in the landscape zone (p87 SBMP) and we disagree strongly with this low limit.
3. We agree with the second dot point on p 46 that extensive engineering solutions to landscape change are not appropriate and recommend that this be correlated with plans in the park for fire trails in sensitive areas such as Stockyard Spur.
4. We note again that the first sentence in Section 5.5 paragraph 2, that “the primary goal for all national parks is biological conservation”, should be given greater prominence throughout the text and established as the prime purpose of Namadgi National Park.
5. The NPA ACT field guide to the reptiles and frogs of the ACT reports (p 63) that three frog species are thought to be extinct in the ACT. The section on frogs p 53 paragraph 3 should be modified to reflect this.
6. Last paragraph p 57 could refer to the fact that one of the ways of reducing the unnaturally large populations of eastern grey kangaroos in the park is to fence off manmade waterholes such as that at Mt Clear and we would recommend that this be done expeditiously. This should also be repeated on p62, in *Pest animal issues and opportunities*.
7. There is an error of fact on p 58 in its reference to the “Boboyan Pines rehabilitation project”. The park care group mentioned is actually called the “Gudgenby Bush Regeneration Group”.
8. We wonder why koalas have been excluded from the section on *Species reintroduction* and suggest they now be included. NPA ACT reiterates its support for scientific research to underpin such management work proposals, be they predator control, species reintroduction or threatened species support.
9. A definition of clean feed for horses should be clearly specified in the text at the top of p 62; NPA ACT is fully supportive of any attempts to educate park users on best practice when in the park.
10. We would support the establishment of a special scientific area in Namadgi National Park as mentioned on p 65 but would suggest that a scientific liaison committee be established to oversee the research and ensure publication of progress and results within a reasonable time frame

## **Landscape objectives and strategies p46**

### **Objective 9: significant landscape elements ... are identified and protected**

Strategies 9.1: we query why only **some** identified areas should remain “free of developments”? Surely all scenic vistas and significant landscape elements should remain free of developments?

Strategies 9.4: again we query why development would be allowed anywhere in the park where it is likely to “impact on values.” We object to the implication here and in 9.1 that development would be allowed where it will only impact on minor landscapes and geological features.

Strategies 9.2 - 9.9: we agree and support.

## **Native vegetation p 47**

**Objective 10: ... retain a high level of ecological integrity across** representative communities, successional stages and age classes.

Strategies 10.1 - 10.12: we agree and strongly support all strategies.

- Strategy 10.3 should be given the highest priority for funding and resourcing.
- Strategy 10.11 needs to be strengthened.

## **Native animals p 51**

**Objective 11: maintain viable populations of existing native species**

Strategies 11.1 – 11.13: we support strongly, especially 11.10 – “ensure that fire management strategies recognise fauna ecology” and recommend that “including birds and invertebrates” be added.

## **Ecological restoration p 57**

**Objective 12: biodiversity is conserved through the implementation of a systematic, science-driven ecological restoration program**

Strategies 12.1 – 12.3: we very strongly support this objective but note that the strategies to support it are very weak and have no specific timetable, priority for funding or measurable objectives.

## **Pest plants p 59**

**Objective 13: pest plants are excluded, controlled and where feasible eradicated...**

Strategies 13.1 – 13.10: we strongly support all these strategies but note:

- that there is no reference to the responsibility of neighbouring ACT lessees to adopt responsible weed and pest control measures. Although some of the leases are managed very well, others are an absolute disgrace with no attempt to even reduce weed infestations on the park's borders.
- Objective 13.8 should be strengthened to read: “Replace eradicated species with native species as appropriate.” NPA ACT would prefer the Plan of Management to call exotic species weeds or feral plants and that no weed replacement should be sanctioned.
- Objective 13.10: deer and cattle should be included with horses, goats and pigs in the list of feral animals.

## **Pest animals p 62**

**Objective 14: pest animals are excluded, controlled and where feasible eradicated**

...

Strategies 14.1 – 14.13: we strongly support, noting that the program for exclusions and eradication of feral horses is a model for the Australian Alps National Parks.

## **Special scientific area and biosphere reserve p 65.**

**Objective 15: maintain the ecosystems and landforms of the Cotter catchment**

Strategies 15.1 – 15.4: we very strongly support, noting that the threat of inappropriate fire management strategies, including new fire trails, is completely at odds with this strategy and this conflict is not resolved in the draft plan.

## **Wilderness**

Strategies 16.1 – 16.2: we note an absolute lack of strategies to protect, maintain and conserve the wilderness area. This is a serious weakness of the draft plan and must be addressed in the actual management plan. Strategies should include priority funding for low impact fire management and for monitoring of illegal vehicle use and vigorous prosecution of vehicle owners and drivers.

## **SECTION 6: CULTURAL HERITAGE**

### **Objective 17: protection of cultural heritage, statutory compliance and best practice.**

Strategies 17.1 – 17.9: we support

### **Objective 18: protection of cultural values through strategic planning**

Strategies 18.1 – 18.12: we support

### **Objective 19: collect and store cultural information**

Strategy 19.1: agree, though it does not place any priority or map out any concrete strategies for enabling the collection of such material and its proper storage.

### **Objective 20: interpretation to promote understanding and appreciation**

Strategies 20.1 – 20.6: agree

### **Objective 21: community role in cultural heritage**

Strategies 21.1 – 21.2: agree, noting that NPA ACT members have strong links to areas where they have contributed to the restoration and rehabilitation of structures such as Orroral Homestead and landscapes such as Gudgenby.

### **Objective 22: appropriate opportunities for sustainable cultural tourism and recreation**

Strategies 22.1 – 22.5: we support with the proviso that cultural tourism has as its primary objective the promotion of the park's values, not income generation; and that any monies raised are used for additional research in the park, not relied upon for management or maintenance of the park.

### **Objective 23: research into cultural heritage values**

Strategies 23.1 – 23.6: agree, noting again that there is neither set priorities nor specific strategies to achieve these worthwhile aims. Without specific actions to support them, we expect that they will be quickly relegated to the 'too hard' basket and forgotten for the life of the plan.

### **Objective 24: enhancement of staff skills and knowledge**

Strategies 24.1 – 24.4: we support

## **SECTION 7: FIRE**

NPA ACT strongly opposes many aspects of the proposed fire management strategy. We oppose new fire trails in the wilderness area and the proposed upgrading of Cotter Hut Road which, in effect, would become a new road. The rationale for increased width and a straightening of roads and fire trails is based on past fire fighting methods which are rapidly becoming obsolete. More effective methods of fire suppression and hazard

reduction are being developed which do not require the use of large bulldozers; these roads would be redundant before the noxious weeds they would introduce had even begun to take hold. 'Tanker Trails" and "Float Trails" are effectively 2wd roads – not 4wd 'trails' as implied by use of term 'trails'.

The use of such equipment is inappropriate and ineffective in such steep and wooded areas; the role of low loader fire trails, their placement and size does not reflect zoning, has no supporting needs analysis and pays no attention to the impact of the use of such equipment on wilderness areas. Such trails and roads would be very expensive to install and even more expensive to maintain over the years to a state where they could serve their intended purpose. The proposed use of low loaders, euphemistically referred to as "floats", to move heavy equipment into areas such as Upper Cotter Valley and Stockyard Spur would cost many millions of dollars and seriously degrade the fragile soils in these areas.

The cost of maintenance, security and rehabilitation of new fire trails is not dealt with, nor is there any process of review of the fire trail system as new fire management strategies emerge. There is no reflection in the proposed fire trail system of the different uses for fire trails, eg for routine fire suppression, to carry out prescribed burning safely or to deal with extreme wildfire events.

The plan of management also needs to address the widely held view that forest litter is merely a 'fuel load' and presents unacceptable 'fire hazards' so that it must always be reduced. The plan needs to more clearly establish the value of forest litter and soil biota as essential elements of the eco-system which are critical to the prevention of soil erosion and land degradation.

The discussion on page 85 in the section on 'Prescribed burning' needs to address the vexed topic of "fuel loads" in the bushland and add specifically:

- that under natural conditions, the depth of fuel load under trees reaches a natural maximum and does not exceed that, as natural rotting goes on underneath the load;
- leaf litter preserves natural moisture levels in underlying layers, which is destroyed by prescribed burning, thereby increasing fire hazard;
- it should also differentiate between regular bushfires and the extreme conditions like 2003, where fuel loads made little difference as wind and dryness of the landscapes allowed the fire to whip along over vast distances; and
- that constant fires (every 5 years) cause constant regrowth, destroy the results of insect breeding and change the nature of the area. In the long run a 1983 or 2003 fire (both after years of drought) will burn the whole bushland anyway. It is impossible to stop the really big fires, and constant control fires only constantly damage the natural processes of the bush.

In the section on page 87 'Fire Access' fails to mention that fire trails in wilderness reduce lack of disturbance and wilderness quality, not just "social values" and "wilderness experience".

## **Section 7: specific objectives and strategies**

### **Objective 25: Research and monitoring**

25.1 – 25.3: we support the strategies outlined here but they leave some serious gaps in strategic planning for fire management:

- more should be done to explore emerging low impact fire management technology which reduces reliance on frequent and widespread prescribed burning.
- care needs to be taken that the research and monitoring programs are tailored to the ACT's specific needs and address the richness and fragility of ecosystems in the park and nature reserves.

### **Objective 26: Application of ecologically-based fire regimes**

Strategies 26.1 - 26.4: We support all.

### **Objective 27: Fire prevention**

Strategy 27.1: We support the development of strategies for early detection, rapid suppression and training and skills development for staff but given our comments above we have serious reservations with the other points as they stand.

### **Objective 28: Fire fuel management**

Strategies 28.1 - 28.3 We support with strong reservations as follows:

- We **strongly object** to the current landscape classification and distribution as a guide for frequent burning. The areas indicated are too broad and do not reflect the wide diversity of plant communities and fauna, especially birds and invertebrates. The sweep of this area's classification does not take into account soil erosion and landscape values, nor the heavy use of such areas by walkers.
- Frequent burning across the areas indicated would do serious damage to the natural values of the park and may even increase its susceptibility to fire.
- We are concerned about the reference to the map of ecological communities and their minimum fire intervals on p92. The map is very coarse and does not reflect the actual complexity of these areas and their diverse communities. The burning intervals described as appropriate for some areas (3,5,7 years) is of great concern. The minimum interval for dry eucalypt woodland/forest in ACT has been indicated as 11 years previously and there is no scientific justification for reducing this. There is clear evidence that there is no benefit in frequent burning of broadscale areas dominated by grassland or grassy woodland.

### **Fire access.**

### **Objective 29: access infrastructure is provided to support fire management activities.**

Strategy 29.1 MUST include a commitment to not reducing wilderness quality and wilderness values.

Strategy 29.2: We support the need for a public environmental assessment before new facilities are installed.

Strategy 29.3: we support the principle expressed here but note that:

- the upgrading of the Cotter Hut road is in effect a new road;
- it does in effect allow new fire trails in areas which will be significantly damaged by them, eg Stockyard Spur. We seriously object to its actual application as demonstrated on map 5.

Strategy 29.4: We support with the addition of a costing of the biodiversity loss.

### **Objective 30: Recreational/domestic fire management strategies**

Strategies 30.1 - 30.6: We support

### **Objective 31: Fire preparedness**

Strategy 31.1: We support both points.

### **Objective 32: Neighbour relations**

Strategy: 32.1: We support.

### **Objective 33: Fire Response**

Strategies 33.1 - 33.2 We support.

### **Objective 34: Fire suppression methods**

Strategies 34.1 - 34.4: we support, except that

- the plan needs to spell out what is meant by “the installation of temporary infrastructure is required”; and the development and use of retardants etc should be a open process.

### **Objective 35: Fire Recovery**

Strategies 35.1 - 35.2: We support.

## **SECTION 8: RECREATION AND VISITOR USE**

The *Land (Planning and Environment) Act 1991* and National Capital and Territory Plans clearly place recreational values second to the natural values of the park. Recreational activities must be compatible with the conservation of natural (and cultural) values and in planning recreational activities we need to recognise that Namadgi National Park is not suitable for large groups or intensive recreational use.

We note again that in all areas of activity it is becoming increasingly impossible to differentiate between for-profit and not-for-profit organisations and there can be no rational assumption that this classification actually reflects an organisation’s capacity to protect and care for the park in its activities. NPA ACT strongly believes that permits, licences and other strategies to ration or restrict park use should only be granted by public process to organisations and activities which best reflect the purpose of the park and its limited resources.

Adding to these concerns is an underlying assumption in this section that commercial activities in the park are something to be encouraged. Trying to make a profit from a public asset like a national park is always a dubious exercise and any such profit is often gained only by drawing down public capital and avoiding paying for replacement and repairs to public resources. It opens the door to commercial exploitation of a public resource, often without adequate compensation to the public purse.

We are even more concerned that special privileges are being contemplated for commercial operators as set out in strategies 38.45 and 38.86 p117. There should be no special access for commercial use of wilderness areas, even if they are doing ‘wilderness management’ projects.

Nevertheless, we are aware that some small, independent commercial operators use the wilderness areas in the park with care and expertise. While it might be impractical to ban all commercial activities in the park, we suggest that licensing and permits for activities in the park should only be granted according to:

- Satisfactory training and expertise of leaders and the commitment of the organisation to long term appropriate park use and environmental values;

- Size of groups, including aggregated annual use of the park by that organisation;
- Relevance of the purpose/intent of the activity to the park, eg experiencing wilderness has a correlation with the stated values of the park but endurance events or large camp-based entertainment events have little relevance;
- Impact on natural values of the park, both immediate and long term;
- Cost to the park of servicing the use and/or restoring the area.
- The granting of licences, permits, fees and charges should reflect the practices and expertise of the operators and the costs of the environmental impact of the activities as well as the for-profit or not-for profit status of the operators.
- There should be no special access for commercial use of wilderness areas (38.45 and 38.86 p117), even if they claim they are doing 'wilderness management' projects.
- Additional government funding must be provided to monitor the impacts of recreational activities in Namadgi National Park and to prevent environmental degradation.

### **Background**

We note that NSW Parks and Wildlife Service are planning to augment facilities for four-wheel drivers by developing a day-use area on Mt Corree. Environment ACT needs to liaise with NSW NPWS to ensure that 4 WD activities don't impact adversely on Namadgi National Park.

### **Objective 36: research and monitoring visitor use to protect cultural heritage**

Strategies 36.1 – 36.5: we support.

### **Objective 37: develop visitor facilities to a safe standard ...**

Strategies 37.1 – 37.4: we support.

### **Recreation facilities:**

Strategies 37.5 – 37.8: we support.

### **Recreation activities:**

Strategy 38.1: we support.

### **Future accommodation options**

Strategies 38.2: we are concerned about this strategy:

- As currently worded it opens the way for commercial use of Gudgenby homestead on a sub-lease to EACT and we strongly oppose such potential use. The only accommodation that should be permitted at Gudgenby should be for Parks ACT rangers on active service.

Strategy 38.3: we strongly support.

### **Vehicle based camping**

Strategies 38.4 – 38.5 and 38.7: we support.

Strategy 38.6: we support except that:

- we consider there is a need for a permit system for large vehicle camping groups and for pack horse groups in common with the limits for pack walking

groups. We recommend a limit of 20 for large camping groups and a limit of 10 horses for horse groups.

38.8: we do not support new campgrounds

- Orroral Tracking station area and Gudgenby valley are used for pack based camping and car-based camping would introduce large groups, noise and disturbances to the otherwise quiet enjoyment of these areas. There is no demonstrated need for additional vehicle based camping areas as the current ones are very rarely full.

### **Pack Camping**

Strategies 38.9 – 38.12: we support except that

- We are concerned that the establishment of 'primitive bush campgrounds' is not explained and may be code for camps designed to accommodate constant commercial camping eg Outward Bound. NPA ACT strongly suggest that if this is the case, then full consultation with ourselves and other bushwalking organisations would need to take place to ensure that we are not de facto excluded from favoured camp sites. This is an issue we will be monitoring very carefully over the next few years.

### **Camping General**

Strategies 38.13 – 38.16: we support, except to note that

- there could be conflict between 38.10 (Primitive bush camps) and 38.14 (semi-permanent and permanent campsites are not permitted) if a commercial organisation establishes such frequent use of a primitive bush camp, or particular campsite so as to in effect exclude others.

### **Recreational driving**

Strategies 38.17; 38.19 and 38.21 – 38.24: we strongly support.

Strategy 38.18: we are very concerned at and strongly oppose the proposal to upgrade fire trails into all weather two wheel drive roads. This cannot be seriously contemplated as expenditure of public money while the research and maintenance programs of the park are struggling for funds. Such a proposal must be dropped off the list for the foreseeable future.

### **Picnicking and sightseeing**

Strategies 38.25 – 38.31: we support

### **Walking and walking tracks**

Strategies 38.32 – 38.37: we support

### **Cycling**

Strategies 38.38 – 38.40: we support.

Strategy 38.41: we **strongly oppose** this strategy.

- No justification for such a change to previous policy is included anywhere in the draft plan, there are no safeguards provided against future abuse and it is completely contrary to all other wilderness strategies.
- Our strong stance on this strategy is based on our information that 'management purpose' can include any activity deemed suitable and could

include tours, commercially operated conservation activities and perhaps even cycling events.

- We are concerned that cycling is allowed on all current management trails because of the potential of mountain bicycles as a hazard to walkers, not just when ridden aggressively but as a constant threat and incompatible use. We recommend that some management trails be allotted to walkers only.

Strategy 38.42: we support the intent of this strategy with reservations.

- It confirms our grounds for opposing new fire trails. It will be impossible to keep bicycles out of sensitive areas where new fire trails have been built.

Strategies 39.43 – 38.46: we support, except that

- we would have imagined that a code of conduct would already exist. This confirms our view that the park management is inadequately funded to carry out its normal responsibilities.

### **Motorised biking**

Strategies 38.47 – 38.49: we strongly support and we urge the government to fund park management to pursue illegal riders to the full extent of the law.

### **Horse Riding**

Strategies 38.50 – 38.53: we support the restricted use of tracks by horse riders within the park.

- However, we have serious concerns that some horse riding groups do not and will not respect such restrictions, eg will not bother with the provisions for weed-free fodder and will use areas such as Horse Gully Hut for overnight camping. Careful monitoring is required and adequate funding must be provided for this.

Strategy 38.54: we strongly oppose any extension of horse riding east of the Old Boboyan Road as it would impact on the Naas River.

- We understand that there will be pressure put on government and management to extend horse trails and to provide more amenable conditions for commercial horse riding operators through the park. We note that in the Kosciuszko National Park, the management planning process was marred by wild accusations, public demonstrations and inflammatory media statements from elements of this group in frequent attempts to politicise the issue. NPA ACT will strongly resist any attempt to broaden access for horses within the park or to lift restrictions on their use, because of our long standing experience of the damage done by horses and careless horse owners to fragile environments.

### **Horse camping**

Strategy 38.55: we support

- Group sizes must be limited to a maximum of 10 horses per day on a permit system. Monitoring of progress through the park must be used to prevent unauthorised camping.
- We note that horse campers are allowed to open the fire trail gate at Mt Clear to drive vehicles into the horse camping area. This is not acceptable and campers should walk their horses and equipment in like other campers.

### **Snow play, ski touring and alpine skiing**

Strategies 38.56 – 38.62: we support

## **Rock climbing and abseiling**

Strategies 38.63 – 38.71: we support except that

- in the face of growing popularity of the sport a permit system should be introduced to limit numbers along with a code of practice.

## **Fishing and Hunting**

Strategies 38.72 – 38.74: we support

## **Boating, canoeing, kayaking and rafting**

Strategies 38.75 – 38.77: we support

## **Flying**

Strategies 38.78 - 38.79: we do not consider hang gliding to be an appropriate sport for Namadgi.

Strategy 38.80: we do not support access to management trails for sport, including hang gliding

- if a specific site for hang gliding is intended, eg Mt Tennant and a specific event, eg Tharwa Show, then this strategy should nominate that site and that event only.

Strategy 38.81: we support

Strategy 38.82: we do not support tourist flights over the park and they should be prohibited.

## **Commercial**

Although this section downplays the impact of commercial activities on Namadgi at the moment, experience in other national parks, even quite remote ones, demonstrates that commercialisation of access to the park can in fact threaten the very natural values which make the park attractive in the first place. This is particularly apparent in Kosciuszko National Park, where commercial interests are given special benefits, often not publicly disclosed, and protecting those interests becomes a political issue.

It is astonishingly easy for commercial activity to begin setting the agenda so that the natural values of the park are sacrificed for a uncertain commercial return. Unless strong safeguards are developed, and the tourism industry agrees to contribute a levy to park management for monitoring, rehabilitation, and research, Namadgi National Park's special character may be destroyed by commercialism. As stated above, it is of great concern to NPA ACT that commercial activities in Namadgi be run on a full cost recovery basis, are low key and low impact and are used to facilitate people's access to the park rather than relied upon to supplement park funding.

The work of Graeme Worboys and Dr Catherine Pickering in Chapter 15: *Tourism and Recreational Values* by in *Independent Scientific Committee Report, an assessment of the values of Kosciuszko National Park* (2004 NSW National Parks and Wildlife Service) provides useful information on working with tourist operators.

Strategy 38.83: we support with the addition that

- conservation organisations should be involved in designing a licensing system
- the licensing system and charges should reflect the practices and expertise of the operators and the costs of the environmental impact of the activities as well as the for-profit or not-for profit status of the operators.

Strategy 38.84 and strategy 38.86: we oppose these strategies.

- Vehicle based commercial tours should not be allowed access to wilderness areas under any circumstances. It is completely contrary to the wilderness purpose and the proviso of a 'wilderness management project' is wide open to abuse.
- Access to management trails for commercial purposes is completely contrary to every other strategy in this draft plan.

Strategy 38.85: we support.

- with the proviso that a criterion addressing an operator's integrity in observing and following environmental protection measures and codes be included.

Strategy 38.87 – 38.88: we support.

### **Group activities**

Strategy 38.90 – 38.93: we support.

### **Special events:**

Strategy 38.94 – 38.97: we support except that

- a bond must be (not "may be") charged to organizers of an event.

Strategy 38.98 – 38.100: **we do not support these strategies.**

- Off track sporting events should not be held in Namadgi National Park which is not a sporting facility by any stretch of the imagination. Such events can be held outside the park. No large events should be held in the park as they are completely inappropriate to its purpose.

### **Industry**

#### **Objective 39: working relationship with local/regional tourism groups**

Strategies 39.1-39.3: we support the idea here but

- We are concerned about the lack of ethical protocols covering environmental protection, advertising and profits. Guidelines should be developed with conservation organizations before "mutually beneficial relationships with tourism operators" can be embarked upon.

## **SECTION 9: A PLACE FOR LEARNING**

We are disappointed that the Strategic Aim for this section does not include any reference to the park as a place for scientific research. This section deals with information, interpretation, tourism, and education and Aboriginal cultural tourism, with research bringing up the rear. The relegation of research to a complementary role in park management, rather than a primary function of the park underlines the focus of the management plan on **use** of the park, not on its conservation role.

The management plan needs to include a specific section – on a par with the water and fire sections - which recognises the important work already being done in the park and to set a series of concrete objectives for future work which can contribute to local, national and international conservation of its natural values over the next few decades. This is critically important given the dangers which climate change poses to endemic species in the park and to the broader Australian Alps National Parks systems.

We strongly support the direction taken in the discussion on pp128 – 133, that long-term research is critical to understanding natural systems; that research must be focused on adaptive management and should be based on "systematic planning and coordination."

**Recommendation 11: that a separate section be developed in the management plan which sets a specific objective for research work in the park; which acknowledges its important contribution to national and international work and sets a series of concrete objectives for future work which can contribute to local, national and international conservation of its natural values over the next few decades.**

## **Background**

The chapter should also indicate the specifics for interpretation and education eg: the natural wonders of Namadgi itself: beauty of scenery, rock formations, flowers, birds, the implications of climate change and the impact of humans.

The dot points under Communication have a commercial emphasis because first priority is given to marketing in the listing under Communication. This directly contradicts the Strategic Aim: "Opportunities will be provided for the community to understand and enjoy Namadgi's natural and cultural heritage; and to actively participate in protecting the values of the park." To rectify the imbalance, the first priority should be for research which will provide the information for communication, interpretation and education.

**Recommendation 12: The priorities should be reordered: education programs, interpretation materials, programs, and information materials should come before marketing and promotion.**

We would ask that the updating of the displays outlined on p. 122 under "Information Services" should include an acknowledgement of the part played by the National Parks Association of the ACT, a voluntary organization, which was instrumental in pushing for a National Park for a National Capital. The acknowledgement should include the many hours of work of NPA (ACT) towards the declaration of Gudgenby Reserve which preceded Namadgi National Park. The present NPA display book in the Namadgi Visitors Centre is still relevant and should be part of the updated display.

Face to face interpretation programs are important and should be retained. We strongly support the statement that managers "need to ensure that the programs receive adequate resources so that objectives can be met" p. 122.

We are concerned that, under commercial-in-confidence arrangements, various operators can work within the park under a cloak of secrecy. Companies such as Outward Bound should be willing, as good corporate citizens, to make transparent such of its operations and concessions as impact on the use of park by other people; and on the broad commercial arrangement in place to recompense park management for service provided. We therefore strongly recommend that Environment ACT publicly clarify and specify its arrangements with any organisation which operates regular or semi-regular groups within the park p.123. Such arrangements should also detail the benefits Outward Bound delivers to Namadgi National Park in return for its use of the park.

**Recommendation 13: that commercial agreements with both for-profit and not-for-profit operators in the park are made public.**

We note that the discussion on p. 124 on innovative ways to meet the increasing demand for interpretative services avoids the easy answer of 'commercialisation' and we support this strongly. We support the options outlined including tertiary students' joining the summer volunteer program but urge caution on two important principles. Firstly such staff should not be used to lower the number or involvement of fulltime rangers. Secondly the use of casual, seasonal and volunteer staff requires full and proper training and support. The high standard of skill, knowledge and experience in current park staff is widely

acknowledged and bringing in volunteers and seasonal works should not lower that standard but rather raise the level of general community awareness and knowledge.

**Recommendation 14: that the number of full time rangers be increased to assist with delivering interpretation programs. If casual staff, volunteers or seasonal rangers are recruited for interpretation, they must have training and continuing support to ensure they deliver programs to a high standard. Where “an ongoing interpretation training program for Aboriginal guides” is recommended, similar training must be given to all staff involved in interpretation.**

**Objective 40: communication strategies**

Strategies 40.1 – 40.3: we support.

**Interpretation services**

Strategies 41.1 – 41.2: we support.

**Interpretation facilities**

Strategies 41.3 – 41.5: we support.

**Information services:**

42.1 – 42.3: we support.

**Education services:**

Strategies 43.1 – 43.3: we support.

**Aboriginal cultural tourism**

**Objective 44: provide opportunities for Aboriginal people ...**

Strategies 44.1 – 44.6: we strongly support.

**Research**

**Objective 45: research and monitoring programs**

Throughout our submission we have expressed our concern that not enough emphasis has been placed on the role of research in park management and on the extent to which current research contributes to national and international understanding of critical areas such as the impact of global climate change. We are alarmed at the lack of specific funding for research, at the lack of concrete objectives and strategies other than those included here and various references throughout the text. We suggest that research is so fundamental to the good management of the park and its proper conservation over coming decades that a separate section – and an adequate funding commitment - needs to be devoted to research in the final management plan.

The importance of research, as stated elsewhere in this submission, is underlined by the growing threat of global climate change. We note the statement on p 130 that “Climate change is emerging as a priority research area internationally, nationally and regionally.” However, this concern is not echoed or supported in other relevant areas of the plan and the seriousness of the threat to the natural values of the park require a far greater commitment in time and money than this plan sets out.

**Recommendation 15: that climate change be given greater emphasis and priority in 2005 Plan of Management and that a request for increased funding and resources be made on this basis.**

We agree that natural and cultural heritage surveys are required in the eastern section of the park including the Booth and Mt Clear Ranges and Naas Valley and that “Flora, fauna

and heritage surveys for this area will be a high priority for research.” However, this is not stated in the actual objectives and strategies in the plan and so loses priority and emphasis.

**Recommendation 16: that natural and cultural heritage surveys be conducted in the eastern section of the park including the Booth and Mt Clear Ranges and Naas Valley and that flora, fauna and heritage surveys for this area will be a high priority for research. Further, we recommend that, until such information is available, the precautionary principle be applied all aspects of management in these areas.**

Strategies 45.1 – 45.8: we support with the proviso that:

- Sufficient funding must be provided to enable proper scientific research to guide and direct management of the park.
- Specific provision should be made for the removal of all research and monitoring infrastructure eg fences, exclusion plots etc when they are no longer needed.

### **Visitor research and monitoring**

Strategy 45.9: we support

### **Natural and cultural heritage research**

Strategies 45.10 – 45.11: we strongly support except that we recommend the re-ordering of research priorities to reflect the importance of natural values on the park, ie

1. Systematic mapping and survey of vegetation
2. Systematic mapping of fauna across the park
3. Management of pest animals with a high priority afforded to fox and feral dog control, dingoes should be protected
4. Indicators of climate change
5. Catchment health and management
6. Fire management

### **Information access and management**

Strategies 45.12 – 45.19: we support with the proviso that, wherever possible, the database be available for public use.

## **SECTION 10: COMMUNITY**

We support the strategic aim of the section and the discussion that follows. However, under “Who is Community?” the following important groups have been omitted:

- Canberra Ornithological Group
- Friends of Grasslands
- Field Naturalists of the ACT
- Conservation Council of the South East Region and Canberra
- Also, we should be listed as “National Parks Association of the ACT”

We also consider that ACT lessees have a special responsibility to Namadgi and that their leases should be managed in such a way as to not endanger the natural values of the park. We understand that many lessees believe exactly the opposite: that the park is a

burdensome nuisance and a threat to their management of their rural land and many are vociferous in expressing that belief. However, the facts of the matter do not support their attitude. Management of ACT leases is part of overall management of ACT land and there should be an overarching commitment from all lease-holders and land managers to the proper protection of ACT assets, including Namadgi National Park.

A very specific example of the interrelationship between ACT lease-holders and conservation of our natural heritage is the protection of yellow box woodland just outside Namadgi but integral to its fauna and flora. Proper management of such areas adjacent to the park should be a feature of these leases, including exclusion of any source for feral plant invasion, eg olives. As well, neighbours should be required to achieve specific targets for reduction of weeds and feral shrubs such as blackberry and briars in order to renew their leases.

In return, we note, there is a lucrative role proposed for park neighbours to provide accommodation and guided tours.

#### **Objective 46: opportunities for the community to participate ...**

Strategies 46.1 – 46.7: we strongly support.

#### **Neighbours**

#### **Objective 47: cooperative relationships with neighbours**

Strategies 47.1 – 47.5: we support with the addition that specific provisions should be made in Land Management Agreements with ACT's rural lessees, eg to

- protect areas of yellow box redgum woodland adjacent or close to the park
- control feral plants and animals.

## **SECTION 11: A PROTECTED AND MANAGED RESOURCE**

### **Section 11: Resource management**

NPAACT is opposed to the introduction of fees for non-commercial and private visitors to the Park as discussed in this section. Namadgi is a community asset funded by the broad community and not just those who visit. Namadgi benefits everyone in the ACT as do the Police, roads, Fire Brigades, sportsgrounds and other community-funded assets.

There are sound economic reasons for not introducing visitor fees. Strong community resistance to such fees has been demonstrated in reduced attendance over a considerable period of time and across different locations including Floriade and Tidbinbilla. Any fee collection system must meet its own costs and the efficient management of a visitor fee collection system is almost impossible to imagine without high cost toll booths on public roads in three different and remote locations.

NPAACT is opposed to the commercialisation of activities in the Park and a discussion of providing for ecologically sound commercial tours and activities is included in section 8. However, we are implacably opposed to commercially operated facilities such as campgrounds. Experience in other jurisdictions (such as the Lane Cove River campground), has shown that this leads to the gradual deterioration and over-exploitation of the site. We don't need to repeat others' mistakes.

We strongly support the introduction of a licensing and full cost recovery system for commercial activities as outlined on p 149.

#### **Objective 48: water quality**

Strategies 48.1 – 48.6: we support noting that

- the construction of new fire trails must “diminish” water quality (48.1).
- liaising with the ACT Emergency Services Authority needs to be included as their activities could become a serious threat to water quality in the Park.

### **Objective 49: Water and energy use**

Strategies 49.1 – 49.6: we support.

### **Objective 50: Noise**

Strategies 50.1 – 50.4: we support; noting that

- the use of electric generators should be banned everywhere within the Park except for essential management purposes. They cause unwarranted noise pollution, especially in campgrounds and picnic areas, which is totally incompatible with the sort of experience sought by the vast majority of park users.
- The plan should specify a minimum flight height for private aircraft of at least 2,000 feet above ground level, which is consistent with practices elsewhere such as the requirement of the Fly Neighbourly Advice for the Blue Mountains National park in NSW.
- The management plan should include a commitment to seeking a determination from the Department of Transport and Regional Services for a complete ban on the use of ex-military jet aircraft for commercial ‘thrill seeker’ flights and related ‘adventure flights’ and crass disruption of passive recreation by ‘aerial hoon flights’. We note that such flights have occurred in recent years over areas such as Kanangra-Boyd National Park which demonstrates the need to ban them before such operations commence in the ACT.

### **Objective 51: waste management**

Strategies 51.1 – 51.7: we support.

- We should also encourage visitors to leave any areas they use cleaner than when they arrived. This good habit is encouraged by our schools and should be extended to our public parks.

### **Objective 52: contaminated sites**

Strategies 52.1 – 52.3: we support.

### **Objective 53: Monitoring and evaluation**

Strategies 53.1 – 53.6: we support with the addition of making the monitoring database results accessible to the public over the Internet.

### **Objective 54: conduct environmental impact assessments ...**

Strategies 54.1 – 54.3: we support.

### **Objective 55: fees and charges**

Strategy 55.1: NPAACT is opposed to the introduction of fees for non-commercial and private visitors to the Park.

### **Objective 56: park concessions and commercial activities**

Strategies 56.1 – 56.7: we support in principle the measure to control commercial activities outlined in this section, should they occur.

- Strategy 56.4 does not offer any real protection from commercial exploitation. On the whole, commercial activities do not fit in with the objectives of having National Parks, which should be natural areas free of commerce.
- NPA ACT has reservations about the operation of commercial non-profit operators in the park (eg Outwards Bound) because, despite best intentions, commercial operators are driven by cost, turnover and growth performance indicators which are not sustainable within a national park setting.
- Commercial activities, other than low impact pack camping, cannot be allowed in the wilderness areas without destroying the purpose of the designation.

### **Objective 57: management trails**

Strategy 57.1: we strongly support.

Strategy 57.2: we strongly object to private vehicle access to the wilderness.

Strategy 57.3 – 57.7: we support.

### **Objective 58: infrastructure in the park**

Strategy 58.1: we support except that

- leases are not appropriate instruments for these purposes. NPA ACT doubts there are any activities compatible with proper use of the Park that need sub-leases to operate satisfactorily.

Strategies 58.2 – 58.6: we support.

Strategy 58.7: we strongly oppose the use of Namadgi for military training.

### **Objective 59: use of fire arms**

Strategy 59.1: we support except that

- the “carrying” of firearms, as well as their “use” should be prohibited in the Park, except for management purposes.

Strategy 59.2: we support.

### **Objective 60: domestic animals**

Strategies 60.1 – 60.4: we support.

### **Objective 61: resource extraction**

Strategy 61.1 - 61.8: we support.

### **Objective 62: implementation of the plan.**

Strategy 62.1: we support with the proviso that

- NPA ACT is disappointed that so little has been done in the draft plan to specify specific strategies, priorities, resource allocations and performance indicators.
- Regular consultation with all stakeholders should be added as a strategy to this Objective.

## **APPENDICES**

**Please add:**

- **Appendix AB: Bird species of Namadgi**

- **Appendix XY: Invertebrate species of Namadgi**

**Appendix 1: Summary of water supply and catchment management provisions**

- No comment

**Appendix 2: Modelled vegetation communities in Namadgi**

- No comment

**Appendix 3: List on nationally important wetlands in Namadgi**

- No comment

**Appendix 4: Threatened species of Namadgi**

- No comment

**Appendix 5: Vertebrate species of Namadgi**

- No comment

**Appendix 6: Heritage sites in Namadgi**

- Page 171 Aboriginal Places: the Mt Namadgi stone arrangements and other Aboriginal sites are not listed as either Heritage or Interim Heritage sites

**Appendix 7: Fuel management zones and access works**

- We are not reassured by the assertion that “the ecological impact in Landscape Division Zones is likely to be less” (p 173) .. than in Asset Protection Zones, given that the latter will experience significant impact on ecological values and soil erosion. The Landscape Division Zones will suffer clear loss of sensitive communities and their replacement by fire tolerant species.
- We are, quite frankly, appalled at the statement on p 175 that “if there is an incompatibility between the minimum fire intervals specified in the map (not supplied) and the frequency of prescribed burning required to achieve the overall fuel hazard standards specified in the Strategic Bushfire Management plan, then prescribed burning will be undertaken at the frequency to achieve the overall fuel hazard standards.”
- The SBMP specifies prescribed burning is to take place in “Native Forest and Shrubland” in the Landscape Division Zone when surface fine fuels are ‘High’ ie litter bed heights 25 - 35mm (p 87 SBMP Version 1). This is the level of leaf litter permitted in the Strategic Bushfire Management Plan for forests in the Landscape Division :  

0 ----- 35mm.
- No leaf would be allowed to fall! And yet this measurement is now to override sound scientific assessment and the government’s duty to protect ecological values of the park??
- ‘Float Trails’ is a misleading term. Many people thought it referred to something similar to horse floats which can be towed by a normal car when in fact it refers to heavy equipment such as semi-trailers. All references to “Float Trails” should be taken out and the more accurate term ‘Semi-Trailer Roads’ used.
- Which of course begs the question of why it is proposed to build semi trailer roads in wilderness and semi remote areas when research, equipment development and new fire-fighting strategies are all pointing towards smaller, quicker response to

unplanned fires and aerial access to remote fires as more effective, cheaper and less harmful? The cost of such roads to build and maintain is prohibitive and would preclude the development of fast, flexible technology better suited to the terrain.

**Recommendation 17: that this section be amended to include:**

- **implementation plans for detailed studies of Landscape Division Zones to identify fire-sensitive plant and animal communities and potential soil erosion sites in the Landscape Division Zone; and**
- **development of an appropriate ‘fuel management’ and fire management access regime which better protects them – and us.**

**SCHEDULES** (Note: these are not listed in the index)

**Schedule 1: Standard of facilities**

- No comment

**Schedule 2: Visitor facilities**

- No comment

**Schedule 3: Indicative guide to events in Namadgi**

- Zone 3 Roaded Natural Recreation Area is simply covered by the statement that “all types of events are permitted in Zone 3” and this is deeply worrying. It leaves the park open to claims for events which are entirely inappropriate for a national park, such as a car rally or motor bike race, as long as they are in Zone 3.
- We strongly object to groups of more than 20 in Zone 2. Zone 3 areas in these localities are adequate for large events but the damage a group of 400 people can do just by walking off-track all at the same time can take years to recover. Even on-track overnight events must go off-track to camp and 400 people camping in Zone 2 areas is simply not acceptable in a national park.

**Recommendation 18: that this table be re-drawn to include limits to Zone 3 activities and to limit group sizes in Zone 2 to 20.**

**MAPS**

**Map 3: Park Zoning**

- We note the large area to the north of the park marked as Zone 3 and suggest that this is where large group events should be held.
- We consider that the wilderness area should be extended as set out earlier in this submission.

**Map 4: Fire management zones**

- The Landscape Division Zone is too broad, too intrusive into the wilderness and semi remote areas. Much more work needs to be done to identify suitable areas for prescribed burning and fuel reduction which achieves the goal of slowing large unplanned fires, without causing long term damage to the complex ecosystems in the areas.

**Map 5: Proposed access works**

- This map is completely at odds with the rest of the management plan. It proposes semi-trailer roads into wilderness, roads up steep, erosion prone slopes and upgrading of the Cotter Hut Road which would make it in effect a new 2WD road through wilderness. It is simply unacceptable and must be completely re-worked.
- The works proposed are so expensive to build and to maintain – presumably for at least the next 30 years at least – that there would be little left in the ACT Budget for low impact fire management strategies and they would be a significant drain on park management funds and management capacity.

**Recommendation 19: that this map be formally withdrawn from this management plan and from the Strategic Bushfire Management Plan and a new map for low-impact access and fire trails be drawn up which more accurately reflects the level of available resources, the topography and natural values of the different areas and which would more effectively support fire management strategies in the park and in the Territory overall.**

## **CONCLUSION**

Thank you for the opportunity to make this submission. The management of Namadgi National Park is very important to us and we hope you find our comments of use. There are a number of alarming strategies proposed in the plan which we shall oppose vigorously but overall we applaud the care and work that had gone into drafting it. We have one final recommendation to make which is a way is the most crucial of all:

**Recommendation 20: that the Namadgi National Park Management Plan be evaluated and updated on a regular, rolling basis every five years, rather than the current exhaustive and cumbersome process of a full re-write whenever resources and time pressure allows.**