NATIONAL PARKS ASSOCIATION OF THE ACT INC.



The Secretary Taskforce on Tourism and National Parks GPO Box 7050 Sydney 2001 parksandtourism@tourism.nsw.gov.au

Dear Sir

The National Parks Association of the ACT (NPAACT) is quite shocked at the terms of reference for the Taskforce for Tourism and National Parks. As a long standing organisation whose main interest is the conservation of national parks and nature reserves, we have followed the current push to increase tourism in national parks closely. Your terms of reference appear to be completely dominated by commercial exploitation of parks, not public use and enjoyment of them.

The tourism potential of national parks has been recently re-discovered by the tourism industry in the wake of a significant failure of other tourism initiatives. Yet organisations such as ours have been calling for increased visitation to parks for decades. NPAACT has been running organised walks, camps and picnics for decades and we actively promote visitation through our website, regular public talks and biannual conferences. We have worked hard to restore buildings such as the Orroral homestead and to encourage people to visit other historic buildings in the park. We have built walking tracks and published pamphlets which provide information on natural values of various walks. We regularly conduct working parties to regenerate degraded areas of Namadgi National Park and local reserves. The problem is that all this activity appears irrelevant to your Terms of Reference because it is not-for-profit and that it takes place within the existing conservation values and objectives of our national parks. So we need some clarification as to whether you are promoting visitation and use of national parks or simply commercial profit from activities in national parks

The first term of reference for your taskforce is to *propose conservation, visitation and tourism objectives targets and measures for Parks.* Why is this Taskforce proposing **conservation** objectives for national parks when they have already been set in the numerous Plans of Management for individual parks as well as the general legislation relating to their administration? It reads as if your taskforce is going to reopen conservation objectives which have been already negotiated at great expense and effort. The Kosciuszko National Park Plan of Management alone cost millions of dollars to develop and took several years of community consultation.

We are seeking an immediate reassurance that your taskforce will in fact work within existing conservation objectives for each and every national park.

The second and third references appear innocuous enough, though we would suggest they contain the usual naïve assertions about funding. There is no lack of will to conduct research in any number of areas associated with conservation and biodiversity, even the potential impact of tourism. What has been lacking is money, pure and simple. It will be very easy for your taskforce to identify all sorts of interesting, even essential areas of research. May we suggest that if you are in fact serious about research you make the easy recommendations – income producing ones largely – dependant on completing particular research before they can be activated.

Then we come to reference four, a not unexpected open door for legislative change to facilitate private investment in public parks. Your terms of reference don't indicate what will happen if the legislative regulatory and structural constraints your taskforce discovers are in fact essential protections of the conservation values of parks. For example, a restriction on bed nights in KNP is designed to restrict the pollution of sensitive alpine areas by sewerage yet it also restricts tourism. Provision of cafes, sealed roads, caravan parks and assorted tourist facilities may enhance visitations to national parks but are currently restricted by legislative, regulatory and structural constraints. Is it the intention of the taskforce to recommend that such constraints be removed?

The last time we read something similar to this reference it was on the Tourism and Transport Forum website and press releases which urged the State and Federal governments to remove such constraints to allow the building of tourism accommodation in national parks. So we are sure you can appreciate our concern and will understand the intense interest with which we will read this section of the taskforce's report.

Reference five is not any more reassuring either. There is no mention of conservation values, or of promoting an understanding of our natural heritage in any of the opportunities, ticketing, pricing, training, licensing, accreditation and commercial objectives. Nor does there appear to be any room for recommendations which would point to a return to national parks of any revenue generated by the additional visitations. There is a vague reference to resourcing in reference seven but it does look as if there is little interest in funding streams returning much income to the very source of this newly discovered tourism focus, the national parks and reserves.

We are well aware of the mixed results of initiatives by volunteer organisations such as Conservation Volunteers Australia to attempt to marry tourism with conservation activities around iconic or 'charismatic' species and locations. The CVA tourism initiative in the ACT at Tidbinbilla Nature Reserve has already run over budget by \$150,000 so we urge caution when extrapolating the Montague Island experience into the wider tourist market.

Reference six raises more questions than it answers. Have not the values of tourism been articulated over and over? Why is there no reference to articulate the conflicts between the tourism industry – as opposed to visitation numbers – and conservation role of national parks? Nor is there is any reference to the role of profit sharing between private interests and government. A major concern of our members is the alienation of individual enjoyment of national parks and reserves for private profit. This comes about through commercial buildings restricting access to areas (eg private

single family dwellings in Thredbo and Perisher), special access to areas (eg through locked gates) for clients of commercial operators and restrictions on public access because of private tours. The taskforce must be aware of the unpopularity of such practices in the general public and should address this issue in its report.

As to reference seven, a Memorandum of Understanding between two government departments does seem a strange inclusion. Are you not both part of the same government and responsible to Ministers in the same Cabinet? Or is this a way of removing legislative constraints? It does appear as if Tourism NSW would like to dictate to DECC what its legislative program should be. Again, this is a part of the taskforce report we will read with great interest and act on urgently if necessary.

Let us re-iterate our support for increased visitation to national parks, lest we are accused of that worn out phrase 'the lock-it-and-leave-it-brigade'. National parks and reserves are our pride and joy. We rarely miss an opportunity to take visitors to our favourite spots, to encourage any and all to visit and enjoy their splendour and all that they have to teach us about our beautiful country. We support all sensible strategies to increase visitations but on their own visitations do not seem enough for your Taskforce. Your focus appears to be on increasing private income streams from the tourism industry use of national parks.

From long experience we are wary of current efforts to hype up parks as the next big thing in national and state tourism. The tourism industry can charge for such things as accommodation, meals, guides and boat rides but it is very hard to make money from a stunning view or from the sounds and smells of a bushwalk. Many a tourism venture has risen and fallen on the whim of hyped up promises which cannot sustain public interest. We suspect artificially inflated guestimates of the potential for profit taking from national parks will be a feature of some submissions to your taskforce. Delivering recommendations based on such premises will only exacerbate the current difficulties of the local and national tourism industry.

We urge the taskforce to err on the side of caution, in particular in pushing for legislative change to hype up commercial investment in national parks. We urge the taskforce to carefully enunciate the difference between visitation and profit taking and we urge the taskforce to leave the management of conservation to park management. Any trade-off between conservation and tourism never ends well for any national park.

Yours faithfully

Christine Joonrey

Christine Goonrey President National Parks Association of the ACT 16 July 2008