

**Submission  
No 321**

**INQUIRY INTO MANAGEMENT OF PUBLIC LAND IN  
NEW SOUTH WALES**

**Organisation:** National Parks Association of NSW, Armidale Branch  
**Date received:** 29/08/2012

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## **Armidale NPA Submission to Inquiry into Management of Public Land NSW**

### **INQUIRY INTO THE MANAGEMENT OF PUBLIC LAND IN NEW SOUTH WALES: TERMS OF REFERENCE**

That General Purpose Standing Committee No 5 inquire into and report on the management of public land in New South Wales, including State Forests and National Park estate, and in particular:

1. The conversion of Crown Land, State Forests and agricultural land into National Park estate or other types of conservation areas, including the:
  - a. Process of conversion and the assessment of potential operational, economic, social and environmental impacts
  - b. Operational, economic, social and environmental impacts after conversion, and in particular, impacts upon neighbours of public land and upon Local Government
  - c. That the following cases be considered in relation to Terms of Reference 1(a) and 1(b):

River Red Gum State Forests in the Southern Riverina,  
Native Hardwood State Forests in Northern NSW,  
Yanga Station in Wakool Shire, and  
Toorale Station in Bourke Shire.

2. The adherence to management practices on all public land that are mandated for private property holders, including fire, weed and pest management practices.
3. Examination of models for the management of public land, including models that provide for conservation outcomes which utilise the principles of “sustainable use”.
4. Any other related matters.

### **This Submission has been compiled by Beth Williams for the Armidale Branch of the National Parks Association of NSW and for BirdLife Australia Northern NSW.**

The National Parks Association of NSW (NPA), a voluntary, not-for-profit non-government community organization, was formed in 1957 to promote the concept of a network of national parks in NSW legislated through a National Parks and Wildlife Act and managed by a professional National Parks and Wildlife Service. A major step forward in NPA’s work was achieved with the passage of the NSW National Parks and Wildlife Act and the establishment of the NSW National Parks and Wildlife Service (NPWS) in 1967.

Our Association, Armidale NPA, has been strongly associated with the National Parks of our region for more than fifty years. We have strongly supported the National Parks & Wildlife Service (NPWS) ever since its formation in 1967. We seek to protect, connect and restore the integrity and diversity of natural ecosystems in NSW.

Armidale Branch of NPA has been involved for many years in work to identify areas for conservation management in the Northern Tablelands Region, with many submissions made during the Regional Forest Agreement processes (RFA). Our member John Williams (deceased) conducted initial flora and ecological surveys in many areas during his years as a Lecturer in Botany at the University of New England. He developed a great knowledge of the flora of northern NSW, which has been widely used as a basis for planning by the NPWS. Armidale Branch NPA has been able to use this information in submissions and lobbying for protection of many significant areas under the NPW Act.

I wish to address the General Purpose Standing Committee No 5 Terms of Reference 1 a. and 1b, especially for the case of Native Hardwood State Forests in Northern NSW, (1c), and also to comment on Terms of Reference 2 and 3.

We are extremely concerned that this Inquiry, through its terms of reference, seems intent on attacking the concept of national parks and on winding back well-established principles of environmental management by looking at impacts of reservation before and after conversion (Terms of Reference 1a and 1b), and by "examining models for the management of public land, including models that provide for conservation outcomes which utilise the principles of sustainable use"(Terms of Reference 3).

This suggests the Inquiry is seeking to identify perceived negative impacts and is canvassing multiple use options such as re-introducing logging, grazing, and recreational hunting, using the false premise that all former uses were "sustainable". We oppose these propositions.

The conversion of public land and voluntary acquisition of private land for inclusion in the national reserve system is a proper, sensible and very balanced part of the land use system of New South Wales.

**SUBMISSION: Term of Reference 1a. Process of conversion and the assessment of potential operational, economic, social and environmental impacts, and 1b. .... after conversion**

**1a.The process of conversion and assessment of impacts for Northern NSW native hardwood forests** occurred through the world class CRA Comprehensive Regional Assessment processes culminating in the inter-governmental Regional Forest Agreements (RFAs) for the Upper and Lower Northeast forest regions of NSW, signed in March 2000.

The RFAs implemented the National Forest Policy Statement of 1992, whereby all Commonwealth and State/Territory governments agreed to a shared vision for Australia's forests, committing to protect environmental values in a world class Comprehensive Adequate and Representative (CAR) Reserve System of national parks and other reserves identified on agreed criteria (the \* JANIS criteria).

\* Janis Report: Report by the Joint Australian and New Zealand Environment and Conservation Council (ANZECC)/Ministerial Council....National Forests Policy Implementation Sub-committee titled *Nationally Agreed Criteria for the establishment of a Comprehensive, Adequate and Representative Reserve System for Forests in Australia, published by the Commonwealth of Australia in 1997.* ]

The CAR conservation needs in NSW were identified through the Comprehensive Regional Assessments, CRAs, a series of expert scientific assessments of environment, heritage, social and economic uses and values of the forest estate, starting 1996-7. Subsequently it was determined that timber supplies were to be maintained at 1999 contracted levels, (140 000 cu m per annum for 20 years), and a revised Forest Industry Structural Adjustment Package FISAP was developed.

Armidale NPA believes the RFA outcome for Upper and Lower North East NSW covering the native hardwood forests of northern NSW is a most positive impact following conversion, and a great step forward in the protection of biodiversity, to which Australia is committed by the signing of the International Convention on Biodiversity.

However, many significant ecological communities and biogeographic subregions remain under-represented, despite significant progress by the NSW government. It is a pity that NSW is playing catch up to most other states in establishing a comprehensive, adequate and representative reserve system, as without such a system it is unlikely that the decline of the State's unique biodiversity can be halted, let alone reversed.

The RFA for Northern NSW has resulted in many additions and new National Parks and Reserves in the Northern Tablelands NPWS Region, including Barool, Butterleaf, Capoompeta, Cataract, Timbarra, Torrington, Mummel Gulf, Carrai, Cottan-Bimbang, Nowendoc, Warrah, etc

A May 2000 NPWS Map states that the Area reserved in the Northern Directorate = 1.28 million ha, and that this is 11.7% of total directorate area.

These conservation areas are significant and important not only for biodiversity protection and for their Aboriginal and non-Aboriginal cultural values, but also for other critical ecosystem services such as fresh water catchment protection, and carbon sequestration.

Scientific evidence clearly shows that protected areas are the most effective way of conserving biodiversity. \* Taylor, M. F. J., Sattler, P. S., Evans, M., Fuller, R. A., Watson, J. E. M., & Possingham, H. P. (2011). What works for threatened species recovery? An empirical evaluation for Australia. *Biodiversity Conservation*, 20(4), 767-777.

Protected areas such as national parks are accepted as of central importance to nature conservation, and have been shown to improve conservation outcomes including reducing the extinction risk of birds (Butchart et al 2012; Bruner et al 2001; Nagendra 2008; Commonwealth of Australia 2009; SOP 2004; Secretariat to the Convention on Biological Diversity 2006; Natural Resource Management Ministerial Council 2010).

### **1a. Positive impacts after conversion:**

#### **i. The management of national parks**

Management is undertaken by the skilled professional staff of the National Parks and Wildlife Service in line with the objects of the National Parks & Wildlife Act, and is supported by a large number of community volunteers who take pride in these special areas. There is public involvement through public exhibition of Management Plans and Management Strategy documents such as Regional Pest Management Strategies, and their referral to Regional Advisory Committees and on to the Advisory Council before going to the Minister for adoption.

The NPWS has developed Plans of Management for most of these new parks and reserves, providing for conservation of biodiversity and cultural values, protection of the ecological integrity of ecosystems, sustainable visitor use and enjoyment compatible with the natural and cultural values of the park, and appropriate programs of feral animal control and invasive weed management, fire control and public access. These are all positive effects of conversion. They refute misinformed claims of numerous adverse effects of National Parks.

The effective management of national parks for conservation is hampered by budget pressure and demands to manage and provide infrastructure for an increasing number of recreational activities such as hunting, horse riding, mountain bike riding, and commercial activities such as various motorbike or car rallies/races and off-road vehicle competitions which are usually incompatible with the conservation purposes of the parks.

#### **ii. Economic benefits – regional tourism and visitor attraction**

Over 80 million visits per year are made to national parks in Australia (Tonge, Moore, Hockings, et al., 2005) and over 22 million visits are made to parks in New South Wales each year. This visitation brings value to the local, regional and national economies. For example, the value of national parks in Canada has been estimated at C\$1.25billion to the GDP; for five world heritage areas in Australia the tourism value has been estimated at AU\$1.372billion (Tonge, Moore, Hockings, et al., 2005); and the tourism contribution from parks in North East, Far South Coast and Snowy Mountains in NSW has been estimated at \$655 million per year (DECC).

The Office of Environment and Heritage, 2012 gives the following Table, emphasising the positive economic impact to rural and regional economies from several national parks.

**Table 5: Visitors, visitor expenditure and tourism jobs in selected NSW National Parks**

Park	Visitors per year	Visitor expenditure	Tourism related jobs
<b>Dorrigo</b>		\$3,200,000	
<b>Sturt</b>	35,000	\$2,300,000	78
<b>Mutawintji</b>	12,000	\$760,000	26
<b>Kinchega</b>	7,000	\$400,000	13
<b>Warrumbungle</b>	50,000	\$1,260,000	46

Source: (Tonge, Moore, Hockings, et al., 2005; Office of Environment and Heritage, 2012)

OEH Annual Report 2010-2011 page 61 states that participation rates in Discovery Programs increased by 33% from 2009-10. Page 63 states that volunteers contributed significantly to conservation and public appreciation of national parks, with about 6,300 volunteers estimated to contribute more than 126,000 volunteer hours to weed and fire control, conservation works, threatened species programs and community education in 2010-2011.

Will these increased visitation and volunteer conservation rates be maintained when shooting begins in 79 National Parks as recreational hunting is introduced, following Government acceptance of the infamous amendment to the Game and Feral Animals Control Act to allow hunting in National Parks?

Or will visitors and volunteers be deterred from entering, due to safety fears as hunters access national parks to shoot feral “game” animals? If so, this threat will negate the potential positive operational, economic, social and environmental impacts of the new parks.

In addition to the tourism contribution to the local community, national parks contribute to local economies via park management and expenditure and employment. Studies have shown that the management of four parks in NSW has contributed \$3.1 million and 65 jobs (Office of Environment and Heritage note, 2012).

### iii. Pest Control in National Parks

The NPWS has considerable expertise in feral animal control, invasive weed management and fire management. The following points are made by a long-term National Parks & Wildlife pest control officer.

Pest animals and plants (weeds) are managed by NPWS in collaboration with neighbours and Livestock Health and Pest Authorities in the overarching Regional Pest Management Strategy. Aerial and ground baiting and trapping and shooting programs are carried out in most areas for wild dogs, foxes, feral pigs and goats, and increasingly feral deer, despite funding constraints. These programs are closely integrated with LHPAs and other authorities and neighbours, and are generally applauded. They are likely to be severely disrupted by allowing individual recreational hunters to enter national parks to shoot feral animals for so-called conservation hunting in NPs.

Aerial shooting is just one of the NPWS pest control measures that include trapping, baiting and use of radio-collared Judas goats. NPWS cooperates with adjoining landholders and puts their resources behind community action to control feral animals. In the western region the contract mustering and removal of goats accounts for many thousands of feral goats each year without a shot being fired.

The trivial numbers of feral animals shot by hunters at a rate of less one animal per hunting day as reported for thousands of hectares of State Forests (Game Council website) compares unfavourably

with the tens of thousands of ferals that are shot each year by a small number of skilled National Park staff.

For example at Toorale Station, now managed by NPWS, between 3000 and 4000 feral animals, including pigs, goats, foxes and cats were shot in a short period.

The last Toorale shoot of 59 hours, (a follow-up program with a reduced population) removed 2973 pest animals (2652 pigs, 39 foxes 12 cats, 270 goats). An additional 772 pigs were also shot on adjoining private properties as part of a cooperative effort. Cull rates were considerably higher on previous shoots. This was achieved by helicopter flights over flooded country where water and deep mud would prevent any serious attempt at on-ground shooting. (NPWS Pest Management Officer (pers. Com)

Skilled pest control officers in a helicopter can shoot more than one animal per minute. For example, during a two hour flight in favourable conditions 130 to 140 pigs were shot. (On one 2.1 hour run, 148 pigs and 1 fox were shot) Such control strategies in the north east have reduced feral animal numbers to a low level and combined with other control methods have kept pest numbers at a level which minimises environmental damage.

Hunting in national parks by recreational shooters is unlikely to seriously reduce the population numbers of wild dogs and feral pigs. Instead it is likely to disturb and scatter the animals and disrupt the organised and integrated control efforts of the NPWS and other authorities.

Landholders adjacent to State Forests where shooters already have access say that hunting is a backward step in feral control. The animals are disturbed from the forest and go onto the private land. Forests NSW are using the presence of hunters as an excuse to reduce their effort at systematic control of feral animals. Lack of coordinated (landscape based) control programs has impacted on all control programs.

Responsible and careful hunters do not “need” access to NPs for hunting because they have access to private land. They have good relationships with private land managers who allow them to hunt trophy animals and to shoot pest species. Irresponsible hunters, who rightly do not have access to private land, are the ones who are most likely to illegally access public lands for their recreation.

The complaint that public land allows feral animals to breed is balanced by the situation where overgrazing of private land can drive feral animals onto public land where feed is available.

### **1b. Impacts after conversion - Perceived negative impacts upon neighbours of public land and upon Local Government:**

#### **I. Locking up of land**

It is alleged that reservation of land for national parks means “locking up the land”. On the contrary, it means preserving the land from degradation by incompatible competing uses, so that it will always be available to the public for the future, and will maintain biodiversity in perpetuity. If our forebears had not reserved our National Parks such as Royal and Kuringai, they would now be mined, drilled for coal seam gas, logged and/or developed for housing or industrial estates.

The concept of national parks is well-illustrated in the film: *The National Parks: America’s Best Idea*, by Ken Burns, 2009. (shown recently on the ABC) This recounts the early story of national park development in the USA by John Muir, Theodore (Teddy) Roosevelt and others, starting with Yellowstone and Yosemite, which were suffering severely from multiple conflicting exploitative uses. They could have been lost if not for the concept of national parks fought for and won by generations of far-sighted conservationists and politicians.

New South Wales reserved the Royal National Park, the first in Australia, at about the same time as USA's first park, Yellowstone. In this time of increasing pressures on the environment from global warming and increasing competition and exploitation of land for coal and coal seam gas mining, NSW does not need an attack on the concept of national parks by the minority Shooters and Fishers Party.

Our national park assets need to be maintained and managed according to the objects of the National Parks and Wildlife Act in the long term social and environmental interests of NSW.

## II. Loss of local jobs in Local Government areas.

Yes, some jobs were lost, e.g from closure of forestry offices, but the Forest Industry Structural Adjustment Package FISAP helped alleviate the impact, and some jobs were created in the NPWS and in the tourist industry. Local tourist officers regularly promote our parks as tourist attractions, and report with approval the economic effect of the number of visitors to parks in their area each year.

## III. Loss of rates from Crown leases purchased for addition to parks to preserve biodiversity.

Many perpetual Crown leases were purchased (at market prices) from willing sellers for addition to National Parks following the RFA decisions, particularly in the Northern Tablelands region, where there were many perpetual Crown leases adjacent to State Forests. The loss of rates revenue was generally modest, since Crown leasehold grazing tenures on the Tablelands were generally rough timbered country not valued highly for rating or agricultural purposes.

## IV. Breeding up of feral animals especially wild dogs, pigs, and goats; increased infestation with weeds, alleged lack of control by NPWS

It is a popular rural myth that all feral animal pests and weeds arise de novo and breed up in national parks, and are not adequately controlled by the NPWS. On the contrary, the NPWS has considerable expertise in feral animal control, invasive weed management and fire management, as outlined above, though limited by budget constraints.

The complaint that public land allows feral animals, especially wild dogs and pigs, to breed is balanced by the situation where overgrazing of private land can drive feral animals such as pigs and goats onto public land where more feed is available. Populations of feral animals will vary with general weather conditions, and there has been a build-up in numbers of pigs, dogs and goats in some areas due to recent higher rainfall/wet years. The answer to this is allocating enough money for NPWS to carry out integrated programs of pest control, not to give access to parks for so-called conservation hunting by recreational hunters/shooters.

Shooting may work as a short term control measure for some pest species, but only if carried out in a controlled way, in conjunction with other control methods and under strict supervision by the park management authority. Recreational shooting alone does not reduce pest populations below their natural increase levels.

Recreational shooting disperses target species, making them harder to eradicate. It makes target species more wary and difficult to control. Once populations drop and animal behaviour changes to make animals harder to shoot, recreational shooters are likely to stop their activity, allowing populations to build up again.

Eradication of feral/game animals from parks and conservation reserves should be the goal of park management, but eradication conflicts with the aims of recreational shooters and the Game Council.

Armidale NPA absolutely rejects the proposition that so-called “conservation hunting” in national parks, controlled by the Game Council under the amended Game and Feral Animals Control Act 2002 will save money for the NSW Government and Parks Service by assisting in feral animal control.

V. Increase in fire risk from excessive fuel build-up in parks

This is alleged to be due to lack of hazard reduction by NPWS. This is increasingly untrue, e.g. in 2010 -2011, OEH completed 159 prescribed burns, treating over 56,000 hectares (OEH Annual Report 2010-2011 page 72). It is also alleged to be exacerbated by lack of grazing as cattle are excluded from National Parks, allowing build-up of undergrowth, leading to increased fire risk.

Both these propositions are refuted by well-based scientific data about their effects on various ecosystems and biodiversity. In particular the removal of cattle grazing from Kosciusko NP has resulted in measured increases in plant biodiversity and habitat for the Mountain Pigmy Possum. Federal Environment Minister Burke has accepted this evidence, and will not allow the re-introduction of cattle grazing into alpine parks. (Reference Minister Burke’s press statements, 2012)

Points made by a National Parks & Wildlife Fire officer of 40 years standing:

It is interesting to note that that on average for the years 1995 – 2004, 22% of fires in national parks started off park and moved on park; 10% started on park and moved off park and 68% started on park and stayed on park. Cook, C., & Shukar, R. (2005). State of the Parks 2004: Department of Environment and Conservation (NSW).

Data for the origin and progress of fires was well documented for the 2000 fire season and it showed that only approximately 10 % of fires originated in park and spread to private property. Approximately 80% of fires started on private land and entered National Parks and reserves.

An important programme is the **joint management** of fire trails in private land adjoining national parks. NPWS contractors develop fire trails along the more easily accessible edge of the private land instead of trying to put fire trails in the impossible terrain of the Oxley Wild Rivers NP. This is a cost effective strategy that provides the landholders with better access to the margin of their property

In 2009-10 50 km of trails were constructed around Long Point for approx. \$90 000 which included grants of \$30 000, \$22 00 and \$18 000 from various sources.

In 2005, 35 km of trails were constructed on private property in the Enmore area.

In 2012, 40 km of Raspberry Road, a public road, was upgraded at a cost of \$109 000 with the support of the Rural Fire Service and Armidale Dumaresq Council

This level of joint management relies upon a consistent effort being made on neighbour relations, not just pertaining to fire but to other matters of mutual concern

Hazard Reduction burning by NPWS is based on ecological grounds. Weather and fuel load are carefully assessed before any HRB is considered. Fires that are started on private land are not timed with any ecological goals in mind.

Fire equipment and trained staff of NPWS are often used to combat fires on private property.

There are **Fire Management Strategies** developed and published for each park or reserve. These annotated maps show the physical features of the terrain and the resources related to fire management such as fire trails, water sources, helipads etc.

Each holding is zoned for three fire management strategies.

- i. **Asset protection Zones** for the reserve and the adjoining properties aimed at protecting life and property.



- ii. **Strategic Fire Management Zones** where fire can be managed for either fuel reduction or for fire fighting to combat an existing fire. Fuel levels are monitored and these areas will be burnt on a rotating basis every 7 to 10 years to provide a mosaic of vegetation age structures and fuel densities. The maps show clearly the fire advantage lines such as roads, trails, creeks, rainforest and rocky areas where fires can be “tied off”. These advantage lines include cleared land within the park and also on adjacent properties.

The fire plan is a **landscape plan** that ignores land tenure in the context of fire fighting. The mapping is developed in consultation and with agreement of neighbours to ensure the best fire management lines for public and private lands. Consultation with older, experienced neighbours is particularly valuable and is sought by NPWS staff when developing

These areas do not necessarily have the best fire regime for that particular vegetation type as there is a compromise between fire management and ecological outcomes.

- iii. **Land Management Zones** where the ecology of the vegetation determines the frequency of fires targeted in the overall management of fires in the area. For example a particular vegetation type may have the goal of “no more than 2 fires in 45 – 50 years” Here the aim is to provide the plant and animal community with a mosaic of burning to maximise biodiversity.

### **3. Examination of models for the management of public land, including models that provide for conservation outcomes which utilise the principles of “sustainable use”.**

'Sustainable use' is a term used in relation to resource extraction for human needs. It is used to determine an extraction rate that ensures firstly that the resource is not extracted beyond its ability to be replenished, and secondly that in extracting the resource other biodiversity and ecological services are not adversely impacted ie the use is ecologically sustainable.

Sustainable use is a misused term, It is not the same as Ecologically Sustainable Management.

Models for the management of public land must incorporate the principles of ecologically sustainable development. Land management models need to consider Australia's cultural context and our unique environment. It is not the case that we can take models from elsewhere and expect them to work in the Australian context.

New South Wales holds in trust a wonderful diversity of birds, native animals, wildflowers and biodiversity. This diversity of life gives the State character, colour, and forms the basis of its cultural identity, as can be seen in the priceless works of writers like May Gibbs and Norman Lindsay, Poets like Judith Wright, in the State's floral and faunal emblems, those of football teams and even in the Sydney Olympics mascot.

The conversion of public land and voluntary acquisition of private land for inclusion in the national reserve system is a proper, sensible and very balanced part of the land use system of New South Wales.

The dedication use and management of a comprehensive adequate and representative protected areas system is a critical, necessary, but not a sufficient action in attempting to protect the biodiversity and ecosystems of NSW, including from the impacts of climate change (Steffen 2009). Subjecting existing reserves to greater extractive or degrading multiple uses would be a retrograde step contrary to the long-term interests of NSW. In this context, perhaps the most constructive approach to the concept of sustainable use is in the arena of promoting stewardship of remnant native vegetation on private land to increase the emphasis on nature conservation objectives in its management, with appropriate assistance for best practice management performance. In this way, the great majority of NSW land which is dedicated to agricultural and pastoral use can also increasingly contribute to conservation outcomes, as leading landholders are already demonstrating.

**4. Any other matters:**

Armidale Branch of the National Parks Association of NSW and members of BirdLife Australia Northern NSW note and regret the attacks on environmental laws in Australia currently occurring through CoAG and at both state and national level under the guise of "reducing green tape"

We urge that the fundamental protections of the environment and biological diversity of NSW be retained and strengthened, and not wound back in contradiction to the views of Australians as expressed through many parliamentary processes leading to the establishment of these laws over recent decades.

**Conclusion:**

Armidale Branch of the National Parks Association of NSW thanks you for the opportunity to make this submission, following an invitation 30.5.2012 from The Hon Scot MacDonald MLC.

We would appreciate the opportunity to appear before the Inquiry if there is a public hearing in Armidale on 5<sup>th</sup> October 2012.

End Submission compiled by Beth Williams for the Armidale Branch of the National Parks Association of NSW and BirdLife Australia for Northern NSW.

Beth Williams, Hon Secretary, Armidale NPANSW

29<sup>th</sup> August 2012

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