



# Nature Conservation Council

The voice for nature in NSW

Senior Team Leader, Reserve Establishment  
National Parks and Wildlife Service  
PO Box 1967  
Hurstville BC NSW 1481

By email: [OEH.ReserveEstablishment@environment.nsw.gov.au](mailto:OEH.ReserveEstablishment@environment.nsw.gov.au)

10 April 2015

## SUBMISSION ON NATIONAL PARKS ESTABLISHMENT

Dear Sir/Madam,

The Nature Conservation Council of NSW (**NCC**) is the peak environment organisation for New South Wales, representing 130 member societies across the state. Together we are committed to protecting and conserving the wildlife, landscapes and natural resources of NSW.

We welcome the opportunity to comment on the *Direction Statement for National Parks establishment* and the *Socioeconomic Assessment in NPWS Acquisition*, as well as community involvement in the national parks establishment process.

The importance of National Parks as a key component of nature conservation has long been recognised as critical in maintaining biodiversity and ecological integrity. New South Wales has been identified as a national leader by developing a comprehensive and transparent National Parks Establishment Plan and forward strategy with community consultation in 2008.<sup>1</sup>

Following the 2013 findings of the Parliamentary Inquiry into Management of Public Land Management in NSW, the NSW Government committed to publicly consult on:

- updating the NSW National Parks Establishment Plan,
- the social and economic implications of new park proposals,
- how to improve community involvement in the reserve establishment process.

The current process of creating a new Directions Statement for National Park Establishment is an opportunity for NSW to further its role as a leader in protected area reservation and management.

We are therefore disappointed that the draft Direction Statement is not as comprehensive as the existing National Parks Establishment Plan that it will replace: it lacks the same level of background and contextual information, fails to set clear targets and focuses on short-term priorities.

We are also concerned that an increased emphasis on social and economic implications of new park proposals and community consultation could detract from the key purpose of reserving and managing the national parks estate for the conservation of nature, in accordance with the *National Parks and Wildlife*

---

<sup>1</sup> Taylor, M. F. J., Fitzsimons, J. A. & Sattler, P. *Building Nature's Safety Net 2014: a decade of protected area achievements in Australia*, WWF-Australia, Sydney, 2014

Act 1974. With only 9% of land in NSW protected in the National Reserve System, we need a clear and comprehensive plan and commitment for future land acquisition to build a diverse and resilient National Parks Estate.

Our comments on each of the key components of the consultation process are outlined below.

## **DIRECTIONS STATEMENT FOR NATIONAL PARK ESTABLISHMENT 2015-2020**

### **1. Update of the NSW National Parks Establishment Plan 2008**

While we recognise the Government's commitment to update the NSW National Parks Establishment Plan 2008 (**Establishment Plan**), we are concerned that the draft Direction Statement for National Parks Establishment (**Directions Statement**) currently on exhibition is an entirely new document, which aims to replace the existing Establishment Plan. While we do not oppose the creation of a new document, we are particularly concerned that:

- much of the contextual information from the Establishment Plan has not been carried across (our concerns are outlined in more detail below);
- the change in title from "Plan" to "Direction Statement" may be seen as weakening the status of the document; and
- the draft Direction Statement lacks long-term vision, as it is only intended to guide Government for the next five years.

Noting the Government's continued commitment to continue the reserve establishment program<sup>2</sup>, we would suggest that rather than creating a new document, the existing Establishment Plan simply be enhanced and updated.

**Recommendation:** *The existing New South Wales National Parks Establishment Plan be enhanced and updated rather than replaced with a new Directions statement.*

### **2. Direction Statement does not contain important background and contextual information**

Compared to the existing Establishment Plan, the draft Directions Statement lacks the same level of background and contextual information, and scientific and policy references. The inclusion of this information in the existing Establishment Plan is helpful for setting the context and justification for national parks establishment. For example, the existing Establishment Plan contains information on the importance of public conservation reserves, the challenges involved in conservation and collaboration, previous achievement and indicators for measurements of progress.

Important background and contextual information is sorely lacking in the draft Directions Statement. Not providing such a context means the statement is ineffective because it is trying to pose solutions when the issues have not been clearly defined. The lack of clear objectives and indicators means it will be difficult to monitor and evaluate progress. We also suggest that the document should recognise the objects and principles set out in the *National Park and Wildlife Act 1974*.

**Recommendation:** *The Directions Statement include detailed background and contextual information relating to protected area reservation.*

---

<sup>2</sup> NSW 2021, Goal 22, Protect Our Natural Environment, p43, available at [www.nsw.gov.au/sites/default/files/nsw\\_2021\\_plan.pdf](http://www.nsw.gov.au/sites/default/files/nsw_2021_plan.pdf)

### 3. National and International targets

Protected area reservation has long been recognised as important for the conservation of biodiversity and maintaining ecological integrity. Internationally, the Convention on Biological Diversity establishes the Aichi targets which include an objective of 17% of terrestrial land conserved in protected areas by 2020<sup>3</sup>. As a signatory to the Convention on Biological Diversity, Australia is working towards a target of 17 percent of our continent to be protected as part of the National Reserve System<sup>4</sup>.

At a national level, the *Strategy for Australia's National Reserve System 2009-2030* includes national targets for a National Reserve System including examples of at least 80 per cent of all regional ecosystems in each bioregion by 2015, and examples of at least 80 per cent of all regional ecosystems in each subregion by 2025<sup>5</sup>.

While we note that the draft Direction Statement references the international and national targets outlined above (on page 4), it fails to clearly adopt or set these targets for NSW. With only 9% of NSW land protected in the National Reserve System, NSW has the second lowest percentage of public protected land, ahead only of Queensland (7.5%). Moreover the draft Directions Statement does not make clear how NSW would act to implement obligations under international agreements such as the Ramsar Convention and international migratory bird agreements for conservation of particular environments, habitats and species. Setting binding goals for biodiversity protection is essential to ensure continuity of political will for National Parks Establishment.

**Recommendation:** *The Directions Statement include clear targets for NSW in line with the National Reserve System.*

### 4. The reliance on CAR principles (comprehensive, adequate and representative) is supported

NCC supports park acquisition based on the CAR principles (comprehensive, adequate and representative). While there is reference to the CAR principles on page 4 of the draft Direction Statement, (when referring to the National Forest Policy Statement), it is not clearly stated that the CAR principles underpin the NSW acquisition process. Given the importance of these principles for park acquisition we recommend that these principles are front and centre in the new establishment plan.

**Recommendation:** *The Directions Statement states clearly that the CAR principles will be applied for park land acquisition in NSW.*

### 5. Detailed information on climate change and the reserve system

While the draft Directions Statement does recognise potential climate change threats, it does not provide a comprehensive consideration of climate change issues, including the important contribution of reserves to the overall health of the natural environment under a changing climate. Significant work has been done on identifying the potential climate change impacts on biodiversity and adaptation mechanisms, and this must be better incorporated into the Directions Statement. For example:

- The plan should recognise the need to identify refuge areas and habitat corridors for species displaced by climate change impacts. For example, the Great Eastern Ranges Initiative is an important initiative in anticipating climate change impacts on species survival.

---

<sup>3</sup> [www.cbd.int/sp/targets/](http://www.cbd.int/sp/targets/)

<sup>4</sup> [www.environment.gov.au/land/nrs/science/ibra](http://www.environment.gov.au/land/nrs/science/ibra)

<sup>5</sup> *Strategy for Australia's National Reserve System 2009-2030*, Australian Government, 2009

- The plan should recognise that coastal ecosystems (such as ecologically endangered Coastal Salt Marshes) will be under threat from sea level rise. Section 6 – Coast and coastal ranges bioregions should specifically recognise this threat.

**Recommendation:** *The Directions Statement better incorporate recognition of climate change impacts and adaptation mechanisms into planning for national park establishment.*

## **6. Thematic Conservation Priorities**

We recognise that the seven thematic conservation priorities in Directions Statement are essentially the same as those in the Establishment Plan. We note however that there is a change in which of these themes is to be given priority over the next five years - with connectivity conservation, culturally important landscapes and places, and lands improving reserve design to support the effective and efficient management of the existing reserve system to be given priority. We are concerned that the establishment of new reserves, particularly in Western NSW is less of a priority under the new Directions Statement. In some regions, such as Western NSW, establishing new reserves and creating corridors between these are of equal importance, consistent with CAR principles and necessary for reaching established targets and objectives.

**Recommendation:** *The Directions Statement recognise that the establishment of new reserves is important for achieving established targets, particularly in Western NSW.*

## **7. Wilderness**

The Directions Statement does not highlight the significant role wilderness areas (as opposed to other landscapes) can have in protecting biodiversity and natural landscapes. We submit that consideration must be given to recognising the important values of wilderness areas as part of the acquisition framework.

**Recommendation:** *The Direction Statement recognise the importance of wilderness areas in protecting the ecological integrity of landscapes and recognise wilderness values as part of the acquisition framework.*

## **8. Private land conservation initiatives**

The draft Directions Statement does not recognise the important role that private land conservation initiatives can have in enhancing connectivity and conservation. It is important to understand the broad overarching conservation framework in which both national parks and private land conservation initiatives play important roles.

The existing Establishment Plan recognises that the achievement of healthy and sustainable landscapes can only be achieved through a broad range of conservation activities on both public and private lands.

**Recommendation:** *The Direction Statement addresses the important interrelationship and interdependence of the National Park Estate with other conservation activities and mechanisms.*

## Socioeconomic Assessment in NPWS Acquisition

We welcome the opportunity to comment on the *Socio-economic assessment in NPWS land acquisition* (socio-economic assessment). We recognise the efforts of the NPWS to provide a framework around the assessment of socio-economic factors in park acquisition but are concerned that the socio-economic assessment relies too heavily on economic and financial indicators and fails to adequately incorporate environmental and social indicators.

In particular, we are concerned that:

- The socio-economic assessment fails to recognise the intrinsic value of ecosystem services.
- The socio-economic response indicators set out in the local economy assessment are all financial and do not recognise the other social and ecosystem values of national parks.
- The socio-economic assessment does not adequately recognise the potential revenue from increased visitation and regional tourism arising from the establishment of new national parks.
- The social and economic values of competing uses to a national park reserve proposal are already adequately assessed through current government agency referral processes.
- In regard to private land, the social and economic cost considerations are covered in the voluntarily negotiated purchase price for the area.

While there is wide-ranging literature about socioeconomic impacts and values of protection areas and National Parks<sup>6</sup>, none are referred to or incorporated into the document. We strongly urge OEH to adopt a broader range of indicators for evaluating the social and economic values of protected areas, beyond the predominantly economic and financial indicators currently identified in the socioeconomic assessment.

## Community Involvement

We welcome the opportunity to comment on opportunities for community involvement in the land acquisition process.

Consistent with Goals 31 and 32 of State Plan NSW 2021, we recognise that it is important to involve the community in decision making on government policy, services and project. However, we are concerned that in some instances vocal, often ill-informed, minorities speak out against park acquisition in direct conflict with international and national targets and well-recognised CAR principles.

Ultimately, community input should be a factor in guiding how park reservation should happen, not whether it should happen at all. The consultation should not change the overarching goals of adding to the national park estate.

The Nature Conservation Council of NSW has the opportunity to recommend appointments to NPWS Regional Advisory Committees (RACs) as well as to the NPWS Advisory Council. In our view RACs and the Advisory Council are a useful way for engaging the community and key stakeholders on the care, control and management of parks and reserves in a particular region and across the state, and should also be

---

<sup>6</sup> See, for example, , Economic Values of Protected Areas Guidelines for Protected Area Managers, available at [http://cmsdata.iucn.org/downloads/pag\\_002.pdf](http://cmsdata.iucn.org/downloads/pag_002.pdf); see also Driml, S. *The economic value of tourism to national parks and protected areas in Australia*, available at [www.crctourism.com.au/wms/upload/resources/100047%20Tech%20Report%20Econ%20Value%20Tourism%20to%20National%20Parks%20WEB.pdf](http://www.crctourism.com.au/wms/upload/resources/100047%20Tech%20Report%20Econ%20Value%20Tourism%20to%20National%20Parks%20WEB.pdf)

engaged on issues related to park establishment. When in operation, the RACs and the Advisory Council are able to further engage with other key stakeholders and the community, for example through public meetings, information meetings with neighbours, field inspections, as well as discussions with scientists and ecologists.

We are concerned that recent delays to the reappointment of RAC and Advisory Council members has meant that these committees have not been operating as effectively as they could be. Further, we understand that some RAC members have not been notified of the opportunity to consider and comment on the draft Directions Statement or Socioeconomic Assessment in NPWS Acquisition.

## Conclusion

While we recognise the Government's continued commitment to continue the reserve establishment program, we are disappointed that the draft Direction Statement is not as comprehensive as the existing National Parks Establishment Plan that it will replace.

In our view, the draft Directions Statement:

- lacks the same level of background and contextual information;
- fails to set clear targets; and
- focuses on short-term priorities.

In our submission we have recommended some simple changes that can be made, building on the existing Establishment Plan, to improve the document.

We are also concerned that an increased emphasis on social and economic implications of new park proposals and greater community consultation could detract from the key purpose of reserving and managing the national parks estate for the conservation of nature, as outlined by the *National Parks and Wildlife Act 1974*. We are also concerned that the socioeconomic assessment currently on exhibition relies too heavily on economic and financial indicators and fails to adequately incorporate environmental and social indicators.

With only 9% of land protected in the National Reserve System, NSW has a long way to go in reaching national and international targets. Moving forward we hope to see NSW regain its status as a leader in protected area conservation.

Yours sincerely,



Kate Smolski  
Chief Executive Officer