



**AUSTRALIAN  
CONSERVATION  
FOUNDATION**

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## Submission on the Draft Queensland Protected Area Strategy



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*Cover: Recently declared Wuthathi (Shelburne) National Park (CYPAL) protects a unique landscape rich in natural and cultural heritage.  
Photo: Kerry Trapnell.*

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*The ACF community speaks out for a healthy environment, Australia's special places, climate action and for lasting social and economic change. [www.acfonline.org.au](http://www.acfonline.org.au)*

## EXECUTIVE SUMMARY

ACF warmly welcomes the Queensland Government's commitment to a greatly expanded and well-resourced protected area estate.

Ensuring there is adequate and comprehensive representation of the full diversity of ecosystems and habitats across Queensland bioregions and sub-regions within protected areas is fundamental to national and international commitments and to the economic future of Queensland.

The delivery of an effective and comprehensive reserve system requires a high level of ongoing public support, a substantial increase in investment and cross-government coordination to ensure it is achieved with the urgency required. Building the ongoing public support requires credible evidence of the socio-economic benefits of protected areas and a strong constituency.

Building regional constituencies to support protected areas will be essential. ACF believes this can be achieved in part by building stronger involvement of Traditional Owners across Queensland, by adapting the successful Cape York land tenure resolution model and increasing joint management opportunities.

ACF welcomes the proposed new level of protection for private land providing an equivalent security to a national park and we look forward to its implementation across Queensland.

While ACF broadly supports the range of initiatives and actions proposed in the Draft Strategy we are concerned that the economic value of national parks as a public good, foundational to the economic future of Queensland, is understated. This creates a misleading view that, because of public budget constraints, an increasing reliance on the private sector is the only solution. We believe the protection of nature and ecosystems which support life and the Queensland economy should be the priority of any government, and a strategy for building public understanding and support for adequate public investment is core to the successful implementation of the Protected Area Strategy.

To properly deliver the Strategy a greater level of financial commitment from the Queensland and Commonwealth Governments is required. This in-turn requires a greater level of public understanding and support of the value of parks and healthy ecosystems.

ACF would like to support the Queensland Government to build that public support, drawing on the experience of NGOs and of other governments where this is being achieved. Well coordinated government leadership and long term partnerships with community based organisations will be key to the successful delivery of this strategy.

## Recommendations

Key steps to progress and deliver the Protected Area Strategy:

1. *In the socio-economic analysis of the national park estate ensure there is a strong focus on:*
  - *the value of national parks to Queensland tourism and the broader economy,*
  - *the social benefits arising from Indigenous ranger groups working in the parks estate and*
  - *the social-wellbeing derived from parks across Queensland.*
2. *Use the socio-economic analysis, and lessons from other jurisdictions and the NGO community to build and deliver a strategy that explains and celebrates the value of protected areas to the Queensland economy and the well being of Queenslanders.*
3. *Drawing on the comprehensive socio-economic analysis of protected areas establish a number of regional science/stakeholder/community reference groups with defined terms of reference to identify and help deliver protected area outcomes across the priority bioregions, including delivery of public engagement strategies. These reference groups should include appropriately qualified and experienced individuals across private conservation, Indigenous interests, public interest NGOs, the scientific community and high-level government representatives.*
4. *In line with the increased recognition of Native Title over the last decade and drawing on lessons from the successful Cape York land tenure resolution program establish a formal process to identify opportunities to create new Aboriginal owned and jointly managed national parks across Queensland.*
5. *Continue to expand Queensland's public protected area estate through the ongoing establishment of national parks in priority areas as a core function of a formal protected areas group and with commensurate funding for acquisitions based on the value of ecosystem services and tourism economy. While the Queensland Government needs to lead on this investment ACF believes the Commonwealth Government also needs to play a strong role through matching funding programs and that this needs to be a coordinated approach through COAG and the National Meeting of Environment Ministers.*
6. *Commit to a steady long-term increase in the capital and expenditure budget for the QPWS commensurate with the socio-economic value of national parks and the task of maintaining environmental values and expanding the protected area estate.*
7. *If Indigenous Protected Areas in Queensland are included in protected area reporting and accounting there needs to be some form of additional statutory protection, beyond just a time limited Commonwealth funding contract, to ensure protection in perpetuity, through a consent based process with Traditional Owners.*

8. *Strengthen the capacity for the ongoing management of protected areas continue and expand the Indigenous Land and Sea Ranger Program throughout Queensland (with increased funding from Queensland and Commonwealth governments) based on collaboration in the design and management of the program with Traditional Owners.*
9. *Continue to protect areas of outstanding natural and cultural values throughout Cape York Peninsula under the tenure resolution process securing adequate representation across all sub-regions within the bioregion particularly on western Cape York.*
10. *Legislate the proposed new tenure of private protected area known as Special Wildlife Reserve as a matter of urgency to ensure that grazing, mining, logging and other extractive and incompatible uses are prohibited in high biodiversity values areas, and there is a robust process to monitor and enforce.*
11. *In setting new targets the focus should be on addressing critical gaps in the reserve network according to the CAR principles and avoid state-wide targets that have the potential to mask the actual effectiveness of conservation initiatives.*
12. *Adopt the IUCN protected area criteria as the framework from which to categorise Queensland's protected area estate and reflect this in reporting and area accounting.*
13. *Revise the principles as detailed in this submission to ensure more clarity that the primary purpose of protected areas is to deliver nature conservation outcomes.*



Wallaman Falls, Girringun National Park. Photo: Bette Devine

## **1 Introduction**

The Australian Conservation Foundation (ACF) is Australia's national environmental organisation. Established more than 50 years ago ACF has an extensive history in working to protect and conserve Australia's environment and advocating for a more sustainable society and economy. ACF has more than 300,000 supporters nationally, is proudly independent, non-partisan and funded by donations from Australians.

ACF has a long history of involvement in the growth of Queensland's protected areas. For over 40 years we have led new initiatives and worked in partnership with government, Traditional Owners and other organisations to identify and protect areas of outstanding natural and cultural significance.

In various capacities we have played a key role in the development of new policy and legislation, secured budget commitments from state and federal governments for protected area acquisitions and, in partnership, developed new ways of protecting landscapes on Cape York Peninsula.

ACF has also played a key role in securing World Heritage protection for the Great Barrier Reef and the Wet Tropics. ACF also continues to work with government and Traditional Owners for World Heritage recognition of appropriate areas of Cape York Peninsula.

We recognise the protected area estate as the legacy of over 100 years of community driven advocacy. From outspoken individuals who successfully secured the first national parks in Queensland to international bodies who establish agreements on targets for the protection of ecosystems that binds countries and their participating governments.

Regional, state, national and international non-government organisations (NGOs) Indigenous people, the scientific community and willing governments share collective responsibility for the protected area estate we see across Queensland today.

## **2 A welcomed strategy**

The Draft Queensland Protected Area Strategy (the Draft Strategy) is a welcomed and crucial policy initiative. The Queensland government's intent behind the Draft Strategy is actively supported and prioritised by ACF and is one that resonates strongly with our supporters.

Protected areas have a proven track record as one of the most effective approaches to the conservation of biodiversity.<sup>i</sup> Further, public protected areas are the backbone of nature conservation efforts across Queensland, which are complimented by private and voluntary initiatives.<sup>ii</sup> The ongoing commitment to establish a comprehensive, adequate and representative (CAR) network of protected areas that is properly managed is welcomed and remains a scientifically robust objective.

In a number of instances, protected areas such as national parks have provided the last refuges for threatened species. For example, the northern hairy-nosed wombat is found only in Epping Forest National Park. Without national park protection, this species could have become extinct.

Disappointingly however, the tone and premise of the Draft Strategy is almost apologetic. Firstly, the Draft Strategy expresses the sentiment that protecting areas means foregoing other economic uses of land (p.3). Further, the premise of the draft strategy treats public protected areas such as national parks as an economic black hole. Both assumptions are demonstrably false and symptomatic of the view that protecting nature is not a good investment.



*Establishing the Epping Forest National Park effectively saved that last remaining habitat of the Northern Hairy-nosed Wombat. Photo: Tim Dolby, flickr*

Unfortunately, the Draft Strategy is substantively focussed on the need to pursue 'cost effective' approaches to expand and manage the protected area estate based on the false assumption that national parks fail to give us return on investment.

### **3 Critical steps**

This section provides a short overview of critical steps ACF believes the Queensland Government must take to ensure the objectives of the Draft Strategy (and the 2011 Biodiversity Strategy) are achieved in a timely and transparent manner.

These critical steps are briefly described below:

- Re-write the narrative by moving away from the notion that protecting areas from environmentally degrading land uses means forgoing other economic opportunities.

This sentiment fails to recognise the value of ecosystem services provided by protected areas (and the cost of rehabilitation for areas outside of protected areas) and the economic value generated by tourism or other land management initiatives.

- Broaden evidence-based decision making to include the social, economic, cultural and health benefits of the national park estate through socio-economic research that captures the multiple outcomes across a range of key government policy areas. Community buy-in to the terms of reference would be invaluable.
- Build a broader constituency in support of expanding the protected area estate in regional and remote parts of Queensland through increased partnerships with Traditional owner groups, Aboriginal Land Councils, regional tourism entities, and community organisations and conservation scientists.
- Establish a formal group with the necessary terms of reference that includes relevant ministers across land, Indigenous, tourism and environment departments and representatives from the previous point to oversee a formal process that delivers new conservation outcomes across the public and private sector. This would be partly based on the successful Cape York Tenure Resolution Implementation Group (CYTRIG).
- Adequately resource an appropriate team within an appropriate department to action the decisions reached in the group identified in the previous point. This would be partly based on the successful Cape York Tenure Resolution Program team within the Department of Aboriginal and Torres Strait Islander Partnerships.

## **4 Context**

The international, national and Queensland policy context provides a valuable external and historical framework to the current initiative. It is important that these are consistently applied in each iteration of government.

Australia's approach to protected areas following the CAR principles is borne out of our obligations as signatories to the United Nations Convention on Biological Diversity (CBD). Under the CBD and as stated in the Draft Strategy, Australia and its territory and state governments are obliged to conserve biodiversity and ecosystem services through representative and well connected protected area systems.

Australia's initial response to the CBD is found in both *Australia's Strategy for the National Reserve System 2009-2030* (NRS Strategy) and *Australia's Biodiversity Conservation Strategy 2010-2030*.

Under the NRS Strategy, targets were set and agreed to by all state and territory governments. These targets included:

- examples of at least 80 per cent of all regional ecosystems in each bioregion by 2015
- examples of at least 80 per cent of all regional ecosystems in each subregion by 2025
- core areas for the long-term survival of threatened ecosystems and threatened species habitats in each of Australia's bioregions by 2030
- critical areas for climate change resilience, such as refugia, to act as core lands of broader whole of landscape scale approaches to biodiversity conservation by 2030.

Priority actions under Theme 3 of the NRS Strategy identify a series of approaches for expanding the protected area estate including accelerating acquisition, facilitating state and territory governments to implement and fund Indigenous Protected Areas and Private Protected Areas, improving incentives for private land conservation, growing partnerships with Traditional Owners, and better application of IUCN guidelines.

The Draft Strategy inclusion of most of these priority actions is welcomed and discussed in further detail in the following sections. However, targets are still not adequately addressed in the Draft Strategy and there need to be more explicit identification of bioregional and sub-region targets as opposed to a state-wide 17% target.

In 2011 the Queensland Government released *Building Nature's Resilience – A Biodiversity Strategy for Queensland*. This important document remains the only comprehensive state wide policy that recognises the values, threats and management responses to Queensland's biodiversity.

In this policy document, commitments were made to continue to expand the protected area estate, reverse the decline in biodiversity, improve connectivity and resilience, enable greater Traditional Owner involvement and improve private land conservation.

The Draft Strategy, the first substantive terrestrial conservation policy initiative since the 2011 *Biodiversity Strategy*, provides welcomed actions both proposed and underway of the goals and targets set in 2011.

## **5 The value of national parks**

Queensland's National Parks are an economic powerhouse. Visitors to national parks pumped \$4.43 billion into the state economy in 2006-7<sup>iii</sup> (\$5.6 billion in 2016 dollars). Of this \$749 million (\$952 million in 2016 dollars) was exclusively attributed to the national parks themselves and would not have been spent if the national park experience was not there. In 2008, this contributed approximately \$345 million to gross state product.<sup>iv</sup>

In 2014 the Tourism and Transport Forum (TTF) confirmed that Australia's natural assets are integral to the national tourism brand. Research by TTF also reveals that 36.1 million domestic and international visitors participated in nature-based tourism, which included visits to national parks, gardens and wildlife parks.<sup>v</sup> Tourism Australia identified that Australia's 'world class natural beauty' is one of the top three considerations of many visitors who chose to come to Australia.<sup>vi</sup>

The assertion in the Draft Strategy (p.14) that only 18% of visitor-related taxpayer costs are currently recovered ignores the \$95 to \$560 million in GST revenue generated by or associated with national park visitor spending each year in, revenue that makes its way back to the Queensland Treasury through the Commonwealth-State GST arrangements<sup>vii</sup>.

This is just the tourism value to Queensland. There are many other ecosystem services enjoyed by Queenslanders that flow from national parks which are more difficult to cost, ranging from climate regulation, clean water and air, amenity value, protection of wild genetic resources, pollination and pest control. These values are estimated to exceed \$38 billion a year across all Australian protected areas.<sup>viii</sup>

It is critical that the Queensland government start fully valuing the very real economic contribution national parks make to the State's economy and reinvests a commensurate amount to ensure their ongoing expansion and management maintains the natural and cultural values. This is effectively an investment into Queensland's \$23 billion<sup>ix</sup> tourism industry.

ACF welcomes the proposal within the Draft Strategy to undertake a socio-economic analysis of the economic and social benefits associated with the national park estate and we look forward to contributing to its scope and terms of reference.

#### **RECOMMENDATION 1:**

*In the socio-economic analysis of the national park estate ensure there is a strong focus on:*

- *the value of national parks to Queensland tourism and broader economy,*
- *the social benefits arising from Indigenous ranger groups working in the parks estate and*
- *the social-wellbeing derived from parks across Queensland.*

#### **RECOMMENDATION 2:**

*Use the socio-economic analysis, and lessons from other jurisdictions and the NGO community to build and deliver a communications strategy that explains and celebrates the value of protected areas to the Queensland economy and the wellbeing of Queenslanders.*

## **6 Coordinating public and private efforts**

ACF believes a formal group should be established to make decisions about acquisition, management and resourcing. Such a group should have decision-making powers and representation across various stakeholder groups.

For example, in 2008 the Cape York Tenure Resolution Implementation Group (CTRIG) was established to make decisions on acquisitions, tenure arrangements and resourcing. This group consisted of three ministers, one acting as a delegate of the Premier, senior staff from the departmental branch delivering the program, and two representatives from each organisation that included Cape York Land Council, Balkanu Development Corporation, ACF and The Wilderness Society. Meeting twice yearly, this group delivered one of the most comprehensive protected area systems for one of the most biologically significant bioregions in Australia.

Given that there is the potential of four broad categories of protected areas (public, private NGO, private voluntary, or Aboriginal owned) that could be implemented across any given landscape. The significance and urgency of the task requires more than an informal group and an all-of government approach.

A formal group comprising Ministers and/or their delegates, relevant stakeholders and under strict terms of reference is far more desirable and an unaccountable than an undefined and undocumented informal group.

### **RECOMMENDATION 3:**

*Drawing on the comprehensive socio-economic analysis of protected areas establish a number of regional science/stakeholder/community reference groups with defined terms of reference to identify and help deliver protected area outcomes across the priority bioregions, including delivery of public engagement strategies. These reference groups should include appropriately qualified and experienced individuals across private conservation, Indigenous interests, public interest NGOs, the scientific community and high-level government representatives.*

## **7 New Aboriginal owned national parks**

The NCA allows for the creation of national park (Aboriginal land) to occur outside of the Cape York context. While the terms of joint management under this tenure may need revision, the framework is there to enable new approaches to establishing national parks in remote regions. Specifically, this could include areas where native title has been determined which overlaps with identified priority land acquisitions. Under this approach there is the potential to support existing Indigenous ranger units or to establish new teams, and an

appropriate governing body that has a deep connection to the proposed new parks. Aboriginal owned national parks might also attract significant third-party investment.

#### RECOMMENDATION 4:

*In line with the increased recognition of Native Title over the last decade and drawing on lessons from the successful Cape York land tenure resolution program establish a formal process to identify opportunities to create new Aboriginal owned and jointly managed national parks across Queensland.*



## 8 Public protected areas

Public protected areas, primarily national parks, provide a generous return on public investment through a growing tourism sector. Further, the maintenance of ecosystem services and public health benefits are only now being appreciated.<sup>x</sup>

Queensland's new tourism initiative – *I know just the place*, demonstrates Queensland's marine or national parks are key attractions to ever-increasing national and international visitors. This is also well established in research by Tourism Australia and TTF. Protecting more of Queensland to secure its natural and cultural values makes good economic sense.

ACF welcomes a detailed and thorough socio-economic assessment of Queensland's national parks. It is expected that this will quantify the tourism and ecosystem service value of national parks and be undertaken on a biennial basis. Input into the scope and terms of reference will be sought by the conservation sector.

The pervasive view that national parks are a cost burden to Queensland taxpayers is refuted by the 2008 study *Valuing Tourism Spend Arising From Visitation to Queensland national Parks* amongst other evidence<sup>xi</sup>. The reality is that parks are economic powerhouses subsidising other sectors of the economy and governments are taking that for granted and failing to build and maintain this vital natural asset of our economy. Governments must stop taking national parks for granted. The premise there is an urgent need for new and innovative ways to fund the protected area estate is mistaken.

While sponsorship and philanthropic investment already provide much needed opportunities to enhance biodiversity conservation across a variety of land tenures, the case for increased reliance on external revenue remains unconvincing in light of the true value of parks to the Queensland economy.

The proposal and justification for sole management of public protected areas by third parties is difficult to support. The employment of a professional well-resourced ranger corps dedicated to fulfilling the primary purpose of parks to conserve wildlife and wild nature is indispensable for a properly functioning parks system. Expansion of the parks estate must include provision for appropriate increases in park ranger positions and resourcing. These decisions should not be separated from capital land acquisition decisions. However, the government must also ensure park ranger resources are used efficiently and not diverted into activities of no immediate value for conservation. In particular QPWS must be appropriately resourced to undertake the critical role of threat abatement and threatened species recovery, and not continually divert resources to visitor services.

ACF does not consider Traditional Owners to be 'third parties' on their own country. The Cape York model of handback to Aboriginal ownership and joint management with Traditional Owner groups is welcomed and encouraged.

#### RECOMMENDATION 5:

*Continue to expand Queensland's public protected area estate through the ongoing establishment of national parks in priority areas as a core function of a formal protected areas group and with commensurate funding for acquisitions based on the value of ecosystem services and tourism economy. While the Queensland Government needs to lead on this investment ACF believes the Commonwealth Government also needs to play a strong role through matching funding programs and that this needs to be a coordinated approach through COAG and the National Meeting of Environment Ministers*

## 9 Funding national parks

In the 2016/17 financial year, the management budget for the Queensland Parks and Wildlife Service (QPWS) was \$158 million. The total area managed by QPWS is 12,982,521 hectares and consists of national and conservation parks, state forests and other environmental state land. The area is nearly twice the size of Tasmania. But only 9,180,466 hectares of this is national park and managed for strict conservation purposes. If we assume an even percentage of this budget allocation is applied across all relevant tenures, Queensland's national parks budget is a deplorably low \$112 million. This is unacceptable.



**Table 1: Lands managed by the Queensland Parks and Wildlife Service**

	Tenure	Units	Hectares	% of Qld
Protected areas under NCA	National Park (scientific)	9	53,189	
	National Park	274	7,110,055	
	National Park (Cape York Peninsula Aboriginal Land)	26	2,017,222	
	National Park Subtotal	309	9,180,466	5.3
	Conservation Park	229	78,666	0.05
	Resource Reserve	51	492,106	0.28
	Protected area total		9,751,238	
Forestry Act	Forest Reserve	33	54,408	
	State Forest	409	3,109,318	
	Timber Reserve	9	67,558	
	Forestry Act Total		3,231,283	1.87
Total area managed by QPWS		1040	12,982,521	7.5

Source: DNPSR.

The capital budget for expanding Queensland's national parks was approximately \$5 million for the 2016/17 financial year; less than 0.05 per cent of the total state infrastructure budget of \$10.7 billion.

#### RECOMMENDATION 6:

*Commit to a steady long-term increase in the capital and expenditure budget for the QPWS commensurate with the socio-economic value of national parks and the task of maintaining environmental values and expanding the protected area estate.*

## 10 Working with Traditional Owners

The Object of the NCA "...is the conservation of nature while allowing for the involvement of indigenous people in the management of protected areas in which they have an interest under Aboriginal tradition or Island custom."

Thus, working with Indigenous people is central to nature conservation under Queensland law.

## Indigenous Protected Areas

Indigenous Protected Areas (IPA) are an effective conservation management tool providing significant social and cultural benefits to some of Australia's most remote regions. New partnerships and investment in conservation have arisen out of the IPA program which are delivering on-grounds results in restoration and threatened species recovery.

The inclusion of IPAs in Queensland's protected area reporting and accounting is only supported where there is protection provided through an additional mechanism. At a minimum, this could be as a nature refuge or as national park (Aboriginal land) with both options available under the NCA. Further discussions with Traditional Owners needs to take place to ensure the most equitable outcome is achieved.

### RECOMMENDATION 7:

*If Indigenous Protected Areas in Queensland are included in protected area reporting and accounting there needs to be some form of additional statutory protection, beyond just a time limited Commonwealth funding contract, to ensure protection in perpetuity, through a consent based process with Traditional Owners*

## Indigenous Land and Sea Ranger Program

The Queensland Indigenous Land and Sea Ranger program administered by the department of Environment and Heritage Protection (EHP) commenced in 2007. An independent evaluation revealed that the program was delivering positive outcomes across natural and cultural heritage protection, increased participation in a land management workforce, contributed to the cultural and conservation economy, and increased partnerships. In addition wellbeing and health benefits, social cohesion, economic activity, community leadership and Closing the Gap targets were delivered by this program. <sup>xii</sup>

### RECOMMENDATION 8:

*To strengthen capacity for the ongoing management of protected areas continue and expand the Indigenous Land and Sea Ranger Program throughout Queensland (with increased funding from Queensland and Commonwealth governments) based on collaboration in the design and management of the program with Traditional Owners.*

## Cape York Tenure Resolution

The landmark Cape York tenure resolution program delivers a leading consent based model of negotiating new Aboriginal owned national parks. This unique process has been supported by successive Queensland governments of all persuasions for nearly twenty years and has resulted in almost all state land on Cape York Peninsula including existing national parks, timber reserves and resource areas being handed back to Aboriginal ownership. This model will soon be extended to the World Heritage listed Daintree National Park.

From its origins in 1996 with the signing of the Cape York Heads of Agreement<sup>xiii</sup>, the tenure resolution process was created to provide land use certainty through the identification, acquisition and protection of areas of high natural and cultural significance.

In 2001, the Cape York Heads of Agreement was supported by the Queensland Government and under then Premier Peter Beattie, the first land titles began to be returned on Cape York. However, it was not until 2007 that the Cape York Peninsula Heritage Act was introduced enabling Aboriginal ownership of national parks.

Since this time ACF along with The Wilderness Society, Balkanu and the Cape York Land Council have played an important and collaborative role in the region's land tenure outcomes.

Returning land to Traditional Owners helps to correct the historical wrong of dispossession of country, and brings with it social and economic opportunity. It is an important first step toward securing long term economic and environmental sustainability on Cape York, providing a foundation for economic initiatives.

Since 1995, the Queensland Government has returned 3.4million hectares of land on Cape York Peninsula back to Aboriginal ownership. This includes over 2 million hectares of jointly managed and Aboriginal owned national parks and over one million hectares of Aboriginal freehold.

A recent independent study commissioned by ACF, found that there still remained subregions of Cape York Peninsula under represented within the reserve system. This included the Weipa Plateau (bauxite province) and the Holroyed Plain.

#### RECOMMENDATION 6:

*Continue to protect areas of outstanding natural and cultural values throughout Cape York Peninsula under the tenure resolution process securing adequate representation across all sub-regions within the bioregion particularly on western Cape York.*



*Cape Melville National Park (CYPAL) is on Aboriginal land and jointly managed by Traditional Owners and QPWS. Kerry Trapnell/ACF*

## **11 Private Protected Areas**

ACF strongly supports the creation of a private protected area tenure with equivalent security to a national park.

However, the creation and funding of secure private protected areas should not be at the expense of national parks.

There is broad consensus that for an area to be considered protected, it requires the security of legislation and gazettal. Queensland's protected area reporting should only include areas gazetted under the NCA.

However, the strength of existing private conservation tenures under the NCA leaves areas vulnerable to threats. For example, existing Nature Refuge areas remain vulnerable to clearing and can be logged, mined and commercially grazed.

### **RECOMMENDATION 10:**

*Legislate the proposed new tenure of private protected area known as Special Wildlife Reserve as a matter of urgency to ensure that grazing, mining, logging and other extractive and incompatible uses are prohibited in high biodiversity values areas, and there is a robust process to monitor and enforce.*

## 12 The future

Queensland's obligations to expand and manage the protected area estate are established under COAG agreements and captured in *Australia's Strategy for The National Reserve System 2009-2030*.<sup>xiv</sup>

Under this strategy, a set of priority actions was agreed to by all jurisdictions including Queensland. Priority actions ranged from ensuring compliance and consistency with international standards, design and selection of areas to increase resilience, accelerated establishment of new protected areas, improved management and planning, quantifying management progress and strengthening partnerships and community support.

In Queensland, interim targets were established under the 2011 *Building nature Resilience – A Biodiversity Strategy for Queensland*. In this still-relevant policy document a set of 2020 targets were established which included reaching a target of 13 million hectares of national park tenure (approximately 9.2 million hectares currently), an additional 7 million hectares of private protected areas, and that management would be international best-practice.<sup>xv</sup>

A new protected area strategy for Queensland should reiterate and remain committed to the targets of both the 2011 State Biodiversity Strategy and the 2009 National Reserve System Strategy.

### RECOMMENDATION 12:

*In setting new targets the focus should be on addressing critical gaps in the reserve network according to the CAR principles and avoid state-wide targets that have the potential to mask the actual effectiveness of conservation initiatives.*

### IUCN Categories

The guiding principles of the Draft Strategy could also be improved with a reference to external measures of protected area criteria. For example, principle 5 of the Draft Strategy is an indirect acknowledgement that not all protected areas have equal legal standing. IUCN protected area categories identify various levels of protection and could provide an external framework for Queensland to reflect in its protected area reporting.

### RECOMMENDATION 12:

*Adopt the IUCN protected area criteria as the framework from which to categorise Queensland's protected area estate and reflect this in reporting and area accounting*

## 13 Principles

The Draft Strategy identifies a set of 11 principles (p. 5) which relate to the 17 actions found throughout the document. While they are a good start there is some refinement required.

- The intent of principle 1, recognising national parks remain central to the protected area system and across all bioregions is welcomed. However, throughout the Cape York Peninsula bioregion all national parks have an underlying tenure of Aboriginal ownership. A fact not reflected in any proceeding principle. While ACF strongly supports expansion of the public protected area estate, a more nuanced principle reflecting Aboriginal ownership of part of the estate would be better.
- Principle 2 is welcomed and supported.
- Principle 3 is supported provided that secure protection is achieved on lands outside the national park estate.
- Principle 4 appears to put conservation on the same footing as tourism and recreation within the public protected area system. This is not supported. The objective of the NCA is the conservation of nature while allowing for Indigenous culture. Other activities need to occur within the confines of ecological limitations and have no detrimental impact on natural values.
- Principle 5 highlights the flaws in terminology and our protected area accounting. The dedication of a protected area should preclude the possibility of threats arising from conflicting land uses such as grazing, logging and mining, which are currently allowed in nature refuges under the NCA.
- Principle 6 potentially creates confusion and is open to misinterpretation. It is assumed that this principle guides the creation of a Special Wildlife Reserve on private land but the wording is poor and it should be made clear this principle will not be used in a retrospective context to wind-back protection of any tenure.
- Principle 7 should be given higher priority given that this is reflective of the Objectives of the NCA.
- Principle 8 is supported with the caveat that private protected areas do not come at the expense of public protected areas.
- Partnerships, as mentioned in principle 9, can take many forms and already take place between management bodies. For example there are successful partnerships between Traditional Owners and private conservation organisations on Cape York Peninsula. These types of partnerships are strongly supported.

- Principle 10 is strongly supported. This principle echoes priority action 3.1 of the NRS Strategy and also the guiding principles of the Queensland Biodiversity Strategy (p. 29).
- Principle 11 is supported through appropriate mechanisms that provide greater security to local government (public land) conservation reserves and enables private landholders to opt-in to voluntary conservation agreements.

#### RECOMMENDATION 13:

*Revise the principles as detailed in this submission to ensure more clarity that the primary purpose of protected areas is to deliver nature conservation outcomes.*

## 14 Direct response to questions

- 1 Do you have thoughts on ways that Indigenous people, government and private landholders can work together on protected areas?
  - *Expand the Cape York Tenure Resolution model more broadly across Queensland.*
  - *Pressure the Commonwealth to improve its delivery of Indigenous funding*
  - *Links conservation projects to successful Native Title determinations with support from the Commonwealth.*
  - *Continue to support the Cape York Peninsula World Heritage process.*
- 2 If you are a private protected area manager, would you be interested in exploring opportunities to work with Indigenous Land and Sea Rangers to implement conservation management activities on your protected area?
  - NA
- 3 What are your thoughts on including Indigenous Protected Areas in Queensland's protected area reporting?
  - *Only if there is real protection given to country. How will the Queensland government define 'protected'?*
  - *What resources will be provided by the Queensland government for IPAs?*
- 4 In what ways should government engage and collaborate with landholders to ensure that the desired outcomes are achieved on private protected areas?
  - *Greater support for conservation planning and the continued support for this through NRM bodies with a clear mandate.*

- 5 What are your views on improving the Queensland Government's ability to deal with breaches of conservation agreements on private protected areas, by the introduction of lower level compliance options?
  - *A collaborative approach is supported*
- 6 Can you suggest what additional support would assist landholders to meet their operational and maintenance costs of nature refuges?
  - *Enabling alternative incomes streams derived for conservation outcomes form carbon abatement, stewardship payments or rate concessions under tight criteria.*
- 7 What incentives would encourage you to become a nature refuge landholder (if your property had the appropriate conservation values)?
  - NA
- 8 Are there any factors that you think discourage uptake of private protected areas?
  - *The fact that it can be mined by a third party, logged by the Queensland Government or be inconsistent with the land tenure purpose.*
- 9 Are there other avenues to maintain the current and expanded parks estate?
  - *Create more Aboriginal owned national parks outside of Cape York, establish their enterprise as a majority manager and assist in securing philanthropic support through a prospectus on top of government contributions.*
- 10 Do you support user fees where the fees would contribute to management costs?
  - *Potentially but there needs to be greater transparency from government on the true value of national parks and their contribution to the Queensland economy.*
- 11 Should Queensland consider a more contemporary approach to visitor use-related fees, similar to other states, to provide an improved contribution to park management?
  - *There are potentially useful options for this to provide Traditional Owners greater income and revenue for their management of national parks particularly on Cape York Peninsula. For example, the ferry ticket for the Jardine River includes camping fees for resource reserves and national parks. This might work in other parts of Cape York.*
- 12 Are you supportive of any of the strategies the Queensland Government is proposing to explore in relation to providing partnership arrangements and additional revenue to assist with managing national parks across Queensland (see Options for future management and enjoyment section on page 14 of the draft Protected Area Strategy)?

- *Tentatively supported*
- 13 How would you encourage partnerships, volunteers, sponsorship and other promotional activities associated with national parks?
- *It needs to be done without losing sight of the core purpose of national parks and that they are part of the global commons. Stewardship is a community responsibility.*
- 14 How would you accommodate a mix of activities on the parks estate while preserving the area's natural condition and protecting the area's cultural resources and values?
- *By prohibiting activities which are incompatible with its purpose*
- 15 Would you support a legislative mechanism that provides for certain third parties to manage activities that occur on national parks (e.g. habitat restoration)?
- *Under strict conditions.*
- 16 What criteria would you apply to these third parties to ensure the best outcome for national parks?
- *Oversight to be retained by QPWS and an audit process with public transparency and access to data.*
- 17 What management activities do you consider suitable for a third party to undertake?
- *Various depending on purpose.*
- 18 Would you support opportunities for corporate and/or philanthropic investment in Queensland's national parks?
- *This should be explored in partnership with Traditional Owners particularly on Cape York Peninsula.*
- 19 The current ratio of public protected area coverage to private protected area coverage in the state is 70:30. Do you think this is appropriate? If not, what sort of ratio should we have, and why?
- *Protected areas of any tenure should be established in a strategic and effective way that meets international and national targets. Whenever there is an opportunity to protect a landscape this should occur. Public protected areas provide a greater public benefit and potential return on government investment.*

## Endnotes

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- <sup>i</sup> Taylor M (2015) Parks: the best option for wildlife protection in Australia, in *Protecting the Wild*. (p. 265-275).
- <sup>ii</sup> Queensland Government (2011) *Building Nature's Resilience – A biodiversity strategy for Queensland*.
- <sup>iii</sup> Ballantyne et al. (2008) *Valuing Tourism Spend Arising from Visitation to Queensland National Parks*, Sustainable Tourism CRC.
- <sup>iv</sup> Ibid.
- <sup>v</sup> Transport and Tourism Forum (2013) *Conceptualising the value of Protected Areas*.
- <sup>vi</sup> Ibid.
- <sup>vii</sup> Ballantyne et al. (p.14).
- <sup>viii</sup> Taylor et al. (2014) *Building Nature's Safety Net*, WWF-Australia.
- <sup>ix</sup> Tourism and Events Queensland (2016) [Tourism Economic Key Facts](#).
- <sup>x</sup> *Australia's Strategy for the National Reserve System 2009-2030*, Commonwealth Government, Canberra, 2010.
- <sup>xi</sup> Ballantyne et al. (2008).
- <sup>xii</sup> Roberts Evaluation PL (2015) *Final Evaluation Report - Queensland Indigenous Land and Sea ranger Program – EHP*.
- <sup>xiii</sup> See Cape York Peninsula Heads of Agreement entry at ANTS website:  
<http://www.atns.net.au/agreement.asp?EntityID=472>
- <sup>xiv</sup> Ibid.
- <sup>xv</sup> Queensland Government (2011) (p.28).