

31 May 2013

via email: [ecotourismplan@nprsr.qld.gov.au](mailto:ecotourismplan@nprsr.qld.gov.au)

Dear Sir/Madam

The Sunshine Coast Environment Council (SCEC) is the peak regional environmental advocacy group on the Sunshine Coast. Established in 1980 it currently represents 50 community groups working on conservation and sustainability with a combined membership of over 15,000 individuals.

## INTRODUCTION

Queensland's Protected Area (PA) estate currently stands at a very low level (less than 5%) with biodiversity, globally, and within Australia in dramatic decline. Yet, instead of recognising that not only does the overall PA estate need to be increased and resourced to achieve recovery and resilience, the State is instead looking to subject these special places to activities that will potentially undermine necessary conservation outcomes. It is extremely concerning and misguided that protected areas with high conservation values are being exposed to the unquantified impacts of cattle grazing, logging, shooting, horse-riding, vehicles and the like demonstrates the lack scientific understanding of the state's tenuous biodiversity condition. It also fails to uphold the cardinal principle of national parks;

*The cardinal principle for managing national parks is to provide, to the greatest possible extent, for the permanent preservation of the area's natural condition and the protection of the area's cultural resources and values. Natural condition means protection from human interference - allowing natural processes to proceed<sup>i</sup>.*

A chronic lack of resourcing provided for the maintenance and enhancement of National Parks seems to have led to the premise that commercial operators can provide a source of revenue, rather than recognising that funding needs to be boosted to protect the values of what little National Park there currently is and to provide for ongoing acquisition and maintenance.

## GENERAL COMMENT

The Draft Queensland Ecotourism Plan 2013-2020 (the "Plan") appears to be framed from the perspectives of the tourism industry and State Government rather than incorporating the necessary community and Traditional Owner aspirations and how they value these special places.

The strategic priorities for the proposed vision to be achieved by 2020<sup>ii</sup> fail to even recognise the ongoing protection of the natural values which underpin the "competitive advantage" and identified attraction and appeal of natural areas for visitors.

The falsenotion that National Parks and other Protected Areas natural assets have been “locked up” and need to be “unlocked”<sup>iii</sup> to allow for commercial operations in an attempt to provide “innovative experiences” could potentially kill the golden egg. This notion is also perpetuated as an the impetus for having to take somewhat drastic measures when in fact the PA provides for a wide range of activities and levels of accessibility. Notably, most visitors prefer passive experiences such as bushwalking. There is a level of “green-washing” with the definition of ecotourism and it is necesassary to qualify within the definition of “Ecotourism” how such tourism “contributes to the natual areas and local communities<sup>1</sup>.... SCEC submits that any commerical activity which operates in a PA should contribute funding *directly* to the protection and betterment of the PA.

There is very little to no mention on monitoring, compliance and review. There must be scientifically robust baseline studies to determine the condition of parks prior to introducing further activity. Management plans must also demonstrate that the activity will have rigour around the operation and any impacts, perceived or otherwise, must be addressed accordingly.

It would appear that aside from recognising the importance of the state’s magnificent natural land and seascapes, there has been an historical lack of funding for the maintenance and enhancement of the protected estate. This Plan looks set to perpetuate this woeful under-resourcing and become ever more reliant on revenue from commercial operators rather than consider introducing a reasonable fee to visit National Parks. One consequence of this is that users to do not contribute in any way towards paying for the life cycle costs of these magnificent natural assets. Maintaning and protecting the significant natural values underprins visitation and the attraction of Queensland's terrestrial and marine environments the integrity of which must not be compromised.

While it is acknowledged that ecotourism managed and carried out in accordance with ecological sustainability can offer a range of nature-based experiences which enhances ones appreciation of the environment, activities should only be undertaken in appropriate areas and in such a way as to not conflict or undermine the cardinal principle. Areas outside of PA which can offer such experiences should also be duly considered while being conducted in an ecologically sustainable manner.

#### Vision & Strategic Priorities <sup>2</sup>

last bullet point: “*priority access to new visitor sites...*”

SCEC is concerned that sensitive areas will be more heavily accessed when existing areas are apparently underutilised.

Facitiate product development and innovation

Enhance existing products and identify new opportunities across Queensland's national parks<sup>3</sup>  
first dot point

“*to ensure public investment opportunities **add value...***” is this value for the national park itself ie what's in it for the national park?

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1 Ecotourism definition page 1

2 Ecotourism Plan Page 8

3 Ecotourism Plan Page 9

Last dot point

*“Foster industry forums... maximise engagement between industry and state government agencies”*

The community and Traditional Owners should be included as an integral part of the engagement

facilitate investment in ecotourism products (new and existing)<sup>4</sup>

First dot point: *Develop a prospectus..* from what criteria, source and with whose input?

5. Embrace a partnership approach between industry and government

it would seem a number of relevant agencies, organisations and sector representatives have been omitted from this table. Such as DEHP, academia, the conservation sector, community and importantly Traditional Owners. SCEC submits the “partnerships” should be revisited to be more inclusive.

The Sunshine Coast Environment Council continues to have strong reservations regarding the operation of commercial activity and enterprise in National Parks. We stress the importance of upholding the cardinal principle of National Parks and the critical conservation outcomes that need to be achieved in the long term. Science and the integrity of the state's biodiversity must prevail.

The opportunity to provide comment on the Draft Queensland Ecotourism Plan 2013-2020 is appreciated. Complementary and supplementary comment will be provided in our submission on the *“Ecotourism Facilities on National Parks – Implementation Framework (Draft)”*.

Yours sincerely

Narelle McCarthy  
Liaison & Advocacy

- i <http://www.nprsr.qld.gov.au/managing/principles/> viewed 31 May 2013
- ii Queensland Ecotourism Plan 2013-2020 Draft for consultation-Executive Summary & pg 8
- iii Queensland Ecotourism Plan 2013-2020 Draft for consultation-pg 7