



24 Feb 2017

To: Department of Environment and Heritage Protection

Cc: Queensland Parks & Wildlife Service
Queensland Regional Groups Collective
Queensland Conservation Council
AgForce
Rangeland NRM Alliance
QWaLC

Prepared by Northern Gulf Resource Management Group as a facilitation and synthesis of stakeholder views in the region.

Re: Submission to QLD Protected Area Strategy

About Northern Gulf Resource Management Group

As one of Australia's 56 NRM Regional Bodies, the Northern Gulf Natural Resource Management Group is a community-led, non-profit organisation concerned with the people and environments of our regional area.

The Northern Gulf region encompasses the catchments of the Norman, Gilbert, Staaten and Mitchell river systems, covering a land area of approximately 196,000 km².

Our Northern Gulf Regional Plan and delivery programs support healthy and productive country, viable communities, and sustainable industries. We work from the paddock to the regional scale to address issues that require a long-term, holistic perspective. Our approach enables community and landcare activity to better address strategic issues of national importance.

As administrators of both State and Commonwealth government funding programs over the past two decades we have developed strong working partnerships with the people and industries that support this natural and cultural landscape.

Our understanding of the Protected Area Strategy

The vision is that "Queensland will grow a world-leading protected area system to effectively conserve the state's unique natural assets." World-leading refers to the sophistication and effectiveness of the policy itself; conserve refers to maintaining the diversity of habitat for native flora and fauna.

The Protected Area Strategy seeks to increase national parks and protected area from the present 8% of land mass to 17% which is the United Nations treaty obligation upon the State. The draft Protected Areas Strategy has been released to facilitate community feedback.

Comments on the Strategy

Funding and financial impacts

We understand that a management strategy is customarily seen as a separate instrument to a funding mechanism. However, the obvious point that is lacking in this draft Strategy is any reference as to how it will be funded for implementation or how it will impact existing financial arrangements.

One of the clearest messages that comes from our stakeholders is that--however well-intentioned a park may be--unless there is adequate funding for park management the area will become a *de facto* burden on the community, especially neighbouring primary producers.

Poorly-funded national parks and protected areas rapidly deteriorate into breeding grounds for pest animals, seed reserves for noxious weeds, and persistent fire hazards due to ineffective or unmanaged fire regimes. ***This is no criticism of the skills or intentions of QPWS staff: it is a direct reflection of the brutally inadequate levels of funding that are made available for park management.***

Unless the issue of adequate resourcing is addressed through enabling legislation (similar to obligations for expenditure on health and education) this Protected Areas Strategy risks being yet another feel-good effort that actually complicates effective on-ground conservation.

Recommendation 1: *That the Strategy provide a thorough discussion on funding mechanisms and address the risks of inadequate funding.*

Impacts on Local Council ratebase and other valuations

The declaration of a Protected Area triggers changes that impact on existing revenue arrangements.

For example, under current policy, local governments lose the capacity to collect rates on property that is declared as a park. However, road maintenance and other services are still the obligation of Council. The Strategy invites Local Government to be an active “partner” in the promotion of Protected Area, but it fails to elaborate on how the loss of ratebase will be addressed.

Similarly, there is not sufficient discussion on how private protected areas will be handled from a pastoral lease perspective. Pastoralists will want to see the detail of what a conservation area declaration will mean to them on a financial basis: what effect will it have on their lease rental, Council rates, and property values?

These questions may be best answered in supplementary material: but they are core questions...the Strategy as released for comment fails to discuss or provide worked examples.

Recommendation 2: *That the Strategy provide a thorough discussion on the impacts of PA declarations on existing financial arrangements. An estimate of impacts should be provided for each local government area.*

Lack of Spatial and CAR modelling to inform Policy

The Strategy is framed as a Queensland-wide policy. However, the existing and potential areas for high value conservation are reasonably well-known and spatially delimited. This fact is not exercised in the Strategy at all, aside from the rather pragmatic observation that Cape York continues to be targeted for a near-total conservation status (regardless of relevant bio-physical factors and a limited ability to match the CYPAL estate with an honest commitment to CAR principles state-wide).

The Strategy does not even mention what the state's "biogeographical regions" are, nor what the CAR targets for each would be. We suggest that the goals for CAR ought to be explicit in the Strategy.

There are existing assessments of high-value conservation areas across the State, and there are accurate land-use and tenure maps for most of the State. Ecosystem mapping and land use mapping represent the "hard" on-ground realities that the Strategy seeks to influence. Clearly, these two realities ought to be brought together and analysed for existing and potential opportunities.

By doing so, the State will find hotspots of contention and areas ripe for low-effort success. It will also be able to model the impacts of the Strategy in a far more nuanced and realistic manner.

This additional modelling effort would be leveraging value from years of analysis and planning effort related to preserving/extending wildlife corridors and creating habitat mosaics for high value ecosystems. This effort would also complement the existing research and analysis based on the CAPAD (Collaborative Australian Protected Area Database).

Much of the necessary synthesis is already held within EHP and QPWS programs, and is also exercised (to greater or lesser degree) in the NRM Plans published by the state's 14 Regional NRM bodies.

Recommendation 3: *That the Strategy be framed around an existing biogeographical regionalisation; that CAR goals be made explicit for each region; and that modelling be included to facilitate a better understanding of the Strategy's effects within each region.*

Local management at the heart of the strategy

Building on the points above, we are concerned that the draft Strategy fails to put localised intelligence at the core of its structure. The way in which land is managed varies enormously across the State, and this has a direct connection to effective policy implementation.

For example, the mosaic of very small (<50ha) Protected Areas typical in the east and south of the State will benefit from policy implementation mechanisms that are completely different to the landscape-scale reserve areas typical in the north and west rangelands.

The Strategy should recognise that decision-making over land management needs to be as close to local stakeholders as possible. The Strategy should give a range of options to local managers so that biodiversity and conservation outcomes are maximised in the context of local conditions.

For example effective management of fuel loads and pasture grasses can be achieved in some cases through closely monitored grazing regimes. If a blanket set of rules is applied through the PA process, we are concerned that sensible, cost-effective management options will be lost.

There are any number of complexities around the use of public areas by private operators and the capacity of local management committees to deliver on state policy. However, it is precisely this

complex space that needs to be addressed by the Protected Areas Strategy and we see little evidence of innovative engagement with these opportunities in the current draft.

The existing network of Regional NRM bodies could be an important asset to a flexible management strategy.

Recommendation 4: *That the Strategy outlines a range of management styles (governance/decision-making) and management options (land management techniques) that can be flexibly utilised to deliver the intended Protected Area outcomes.*

Lack of an explicit monitoring and reporting mechanism

We are not aware of any systematic process of land condition monitoring and assessment currently undertaken for Queensland's Protected Areas. The draft Strategy makes no mention of a historical knowledgebase that provides data on PA land condition, connectivity, or trend toward achieving CAR goals.

This is an evidence gap that puts all policy and investment decision making into a zone of significant uncertainty. A lack of solid monitoring data and well-formed condition assessment promotes an adversarial approach to management options, increases the risk of poor implementation alignment, and lowers the returns on investment.

Recommendation 5: *That the Strategy explicitly describe a monitoring and assessment mechanism, including periodic review of metrics and adaptive management pathways. This mechanism should include both regional and consolidated reporting against CAR goals as well as estimates of socio-economic factors associated with the Strategy's implementation.*

Necessity of a compliance mechanism

The draft Strategy does ask the question about how compliance with Protected Area qualities should be enforced. It is good to have this problem in the open, but (with respect) this is an example of where policy-makers should be taking a lead. The stakeholders, ourselves included, are not qualified to propose the sort of framework that is necessary.

A compliance framework needs to include measures that are practical and enforceable for both public and private land managers, and at small and large property scales.

Recommendation 6: *That the Strategy (draft process) propose a number of compliance options with scenario and tradeoff examples included to facilitate constructive public feedback.*

Transparency and accountability

The decision-making process related to gazettal/de-gazettal of Protected Areas is not elaborated in the Strategy. This lack of transparency may not be intentional, but the draft does not clarify. We suggest that the best outcomes will be achieved when there is an open and auditable decision-making process available to the public.

Recommendation 7: *That the Strategy discuss arrangements for gazettal decisions, including how decisions are reached and the specific considerations taken into account in each decision.*

Indigenous development and protection goals

The draft Strategy appears uncertain about how IPAs will be handled. We fully support the inclusion of any tenure covenant mechanism in the CAPAD as long as the covenant is capable of satisfying the intent of the Protected Areas legislation. We are completely opposed to a dilution of the meaning of Protected Area, however, and are concerned that the draft Strategy may introduce more uncertainty in this regard.

IPAs are flexible enough to offer significant conservation protections, but they are easily modified or extinguished by the signatory community.

Recommendation 8: *That IPAs as currently constituted are not considered as proxy PA agreements. PA gazettal will continue to require a higher and more permanent form of tenure covenant.*

Removing uncertainty around landuse

One of the more troubling assertions in the draft Strategy's Guiding Principles is #5's commitment to securing the "majority" of the PA system from conflicting land uses, such as resource extraction.

This statement needs to be re-phrased. Resource extraction is one of the more obvious definitions of a prohibited activity in a Protected Area. An area in which mining is permitted is clearly not being "protected" under the intent of the CBD. Certain human activities are permitted in Protected Areas, but there are strict rules on how this activity is accounted for and the range of impacts that are implicit in the activity.

A mining operation inside a national park is not a new concept...but the State would not be allowed to declare the entirety of the park as a protected area.

The current wording suggests that as long as a simple majority of the Protected Areas are "secured" against conflicting land use, the other half of PAs could be less than secure.

Recommendation 9: *That the Strategy be open and explicit about how conflicting land use will be considered, and accounted for, within the goals of the Protected Area process.*

Failure to capitalise on existing relationships

The draft Strategy makes it clear that the State is looking for productive partnerships with private land holders and local government in order to deliver improved performance in the PA process.

This is a good move and we applaud EHP for the initiative.

However, the discussion around Parks management and conservation reserves has been going on for a long time now. The QPWS are central to this but none of their management processes and protocols feature in the draft Strategy.

Likewise, Local Government have very specific concerns and points of interface with park/reserve management, yet the Strategy fails to give this interface a headline treatment. What does "partnership" actually mean in this context?

Finally, the network of Regional NRM bodies are very well placed to act as knowledge brokers, assessors, advisors, and convenors to implement the Strategy. The NRM bodies have received millions in public funding over the past two decades in order to develop a capacity for synthesising local

intelligence with State-wide policy goals. Given the mandate and the requisite resourcing, the Regional NRM bodies could be a very cost-effective implementation partner.

Recommendation 10: *That the Strategy be re-cast in light of existing stakeholder networks, recognising the value of current management processes and drawing on the potential of existing community institutions such as Regional NRM.*

Our thanks to the members of Northern Gulf for their contributions to this submission, in particular: Gulf Cattleman's Association, Undara Experience, Savannah Guides, Cairns and Far North Environment Centre, and the North Queensland Naturalists.

Thank you to the Department of Environment and Heritage Protection of the opportunity to comment.

Kind regards,



John Brisbin
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Northern Gulf Resource Management Group