



NATIONAL PARKS ASSOCIATION OF THE ACT INC.

Mr Mick Gentleman
Chair, Standing Committee on Planning and Environment Committee
ACT Legislative Assembly
Canberra ACT 2601

Dear Mr Gentleman

Thank you for the opportunity to contribute to the Inquiry into the Namadgi National Park Draft Plan of Management. The National Parks Association of the ACT (NPA ACT) has a long history of active association with Namadgi National Park and a very direct and passionate interest in its conservation. Over the past 50 years, from when we first began campaigning for a national park in the ACT, our members have worked hard to promote the protection of fauna, flora, scenery, natural features and cultural heritage in Namadgi.

NPA ACT made a substantial submission to the draft plan in November 2005 and we have been anxiously waiting to see the final plan ever since. However, there are great difficulties in making a sensible contribution to your Inquiry when we don't know what the final plan proposes. We do not know what changes have been made to its key management principles. We cannot make a judgement on catchment protection if we are unable to read how the Glossary defines key concepts such as 'management purposes'. We know that some years ago this term was considered a useful loophole to permit commercial accommodation in the park. We would like to be reassured that this is not contemplated under the new Management Plan but remain in the dark at this time.

Again, we would like to check how our concerns about fire management have been addressed but can only find reference to section numbers, not their actual content. For example, we look forward with great interest to checking what s. 7.4.3 says in relation to a commitment to providing an appropriate level of access for fire management purposes (p12 of the Report on Submission June 2007) when the final Management Plan is finally released. Other key changes to the draft Plan of September 2005 flagged in the Report on Submissions June 07 include:

- p 5 "An additional management principle has been added (see *Limits of acceptable disturbances* s. 1.6)."
- new or different fire management policies and actions are flagged at s. 4.6.3, (3.11 & 3.12); s. 7.4.1 (25), s. 7.4.2 (26.2, 26.5);
- a Glossary of key terms has been added;
- special Aboriginal access is addressed in s. 6.4.5; and
- text on eco-tourism has been expanded.

Notwithstanding the difficulties of operating in the dark, we would like to make the following comments in relation to your committee's Terms of Reference.

The administration of the consultation process during development of the Draft Plan of Management;

At the time of the release of the draft Plan of Management in September 2005, we considered the relevant officers of the then Environment ACT conducted an open and fair consultation process. Notes from that time show that our members attended departmental briefings and community discussions. Our questions were answered frankly and the difficulties we saw in the plan were openly acknowledged and alternate suggestions listened to carefully. In short, we have no quibble with the administration of the consultation process up to the close of submissions.

However, this consultation process has been severely compromised by several factors. The long delay between close of submissions and finalisation of the plan means that almost half of the intended life of the plan has now passed and it is already out of date.

Secondly, analysis of the document, Report on Submissions June 2007, raises concerns about the accuracy and comprehensiveness of that report. For example, the report states on page 22 that "One submission expressed opposition to commercialisation in the park" yet even we have been able to verify that at least three people made the point in their submission that they objected to commercialisation in the park.

Again, the report summarises positive statements in support of ecotourism including the very contentious issue of commercial access to Zone 1 but does not refer to the NPA submission which vigorously opposed this. There are many more examples of what seems to be a consistent pattern of downplaying submissions which did not go with the general drift of the report's argument for increased recreational access.

The process has been further compromised by one very significant change to the original document, that of granting horse access to two new areas. Had this proposal been made at the time of the original consultation we would have been able to point out that:

- The whole idea of granting access to the upper Grassy Creek Fire Trail through private property is based on using Namadgi National Park to address a perceived problem with a NSW road. It sets an extremely dangerous precedent to use a national park to solve a road problem for a select group of non-motorists and to use ACT resources to address a NSW issue.
- Horses in the upper Grassy Creek area open up a fairly pristine area to weed invasion. It is impossible to ensure horse riders stick to the Grassy Creek Fire Trail and do not trespass onto the very accessible open country which the fire trail goes through. While most horse riders are quite responsible, some are openly dismissive of having to use designated trails and clean feed, however these may be defined in the plan.
- The new route will not just be used for through traffic on the Bi-Centennial Trail but encourage increased ad-hoc use of the Grassy Creek and Burnt Hill/

Long flat areas and advantages commercial horse riding businesses in the Yaouk valley. Strangely enough, it is the owners of these businesses who are the most vociferous in criticising the ACT government for its management of Namadgi through the BUGS organisation;

- Alternate solutions exist to address perceived issues of road safety within the national park. The existing Boboyan Road has very wide verges throughout the area which could be adapted for horse riding;
- Horse riders who have already said they will use this access to press for even more access to the area between Grassy Creek and Old Boboyan Road which is an area they have wanted to use for a long time. Going on similar experiences in Kosciuszko National Park, we predict that it will be a relatively short time before they are demanding horse camping facilities at the gate into Grassy Creek Fire Trail and access to the areas adjacent to the wilderness area and Yaouk Nature Reserve. In KNP horse riders are now demanding that internal park roads be upgraded with culverts which can take the weight of their buses and multi-horse trailers.

The effectiveness of consultation with key stakeholders

At the time of the consultation process we were warned that the number of submissions for or against an issue would be counted as a kind of ‘vote’ for specific actions rather than taking into account the amount of research and consultation with our members which formed the base of our submission. In fact NPA ACT is one of the few submissions to have taken into account recreational use as an overall component of park management and balanced it against conservation requirements.

As far as we can tell from the Report on Submissions June 2007 it appears that the single-use recreational submissions (eg cyclists, rogainers and horse riders) have successfully made a case to give a specific recreational use of the park precedence over conservation of the natural values of the park. For example:

- upgraded or new walking tracks are to be considered for cyclists’ use;
- special conditions are proposed for access of bicycles and vehicles in the Wilderness area (s. 8.7.4 (policy 39.24) and s. 8.8.1 (policy 39.74));
- horse riders are to be given access to Grassy Creek and hence the western side of Boboyan Road;
- establishment of a walk-in camping area are planned to accommodate rock climbers despite the history of damage to this sensitive area from previous camping arrangements;
- an increase – without any pressure from any submission, as far as we can tell – in numbers of walkers is to be permitted in Zone 1A;
- large group events are no longer defined nor restrained/restricted to certain areas;
- new vehicle based campgrounds remain on the plan in very sensitive areas such as Yankee Hut;
- use of Gudgenby Homestead (not the Readycut Cottage) for overnight accommodation – presumably commercial - is now proposed.

We would have to conclude from these changes to the original draft that the effectiveness of the consultation process in protecting the conservation values of the park was very poor because there appears to have been a distinct bias to commercial

and other recreational interests that do will inevitably damage the natural values of the park.

The nature and level of participation by the Interim Namadgi Advisory Board in developing the Draft Plan of Management;

We are unable to comment on this term of reference as we had no direct contact with the board nor we were privy to its workings.

Namadgi National Park's value as a biodiversity conservation area and as part of a greater regional conservation corridor; including catchment protection and fire management issues;

The Report on Submissions June 07 says that entirely new sections have been added on climate change, biodiversity and strategies to address climate change and limit stressors. This makes it very difficult to comment on how the Management Plan will address this term of reference without knowing what the new plan contains.

In terms of the value of Namadgi National Park as a biodiversity conservation area, it has of course a profound significance because of its location. The government website states: "Being at the northern-most reaches of the alpine environment, Namadgi National Park is the crossroads for a range of plant communities from alpine, inland tablelands and coastal environments." The Statement of Values of Namadgi for the 2002 review of the Namadgi Plan of Management says: "Namadgi has a close ecological relationship with the Australian Alps National Parks, forming the northern limit to the distribution of a range of subalpine and montane ecological communities that extend across NSW and Victoria, whilst other prominent relationships exist with the woodland communities of the coastal escarpment and general communities of the Murrumbidgee Catchment." However, it is clear from changes outlined above that these biodiversity values may be at risk under the new management plan.

One indicator of the challenges facing the park in an era of climate change is the invasion of new feral plants and animals over the past few years. European wasps have spread throughout the park with our members observing wasps and their nests even in the alpine areas. Where once our greatest concern was the spread of Broom, Blackberries, St.Johns Wort and Vipers Bugloss we are now concerned about large scale infestations of weeds associated with a warmer drier climate including , African love grass, Mexican feather grass and Alligator weed. The growth of the Eastern Grey Kangaroo population in the southern area of the park may threaten the biodiversity of the grassland areas. Wild deer are now joining feral pigs and horses in degrading the sub-alpine and montane areas of the park.

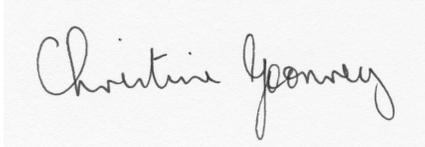
It is difficult to overestimate the gravity of the situation. There is a real prospect that Namadgi's value as a biodiversity conservation area and as part of a greater regional conservation corridor will be seriously endangered by the concessions made in the new management plan.

NPA ACT submits therefore that there must be an overriding provision right up front in the final Plan of Management which says that the conservation values of the park must always outweigh other uses of the park, eg recreational uses where a conflict exists.

Conclusion

We would respectfully submit that in fact this Inquiry will be of limited use until the final Plan is released. We urge the Inquiry therefore, to delay its report until the public have had a chance to study the final plan.

Yours sincerely

A rectangular box containing a handwritten signature in black ink. The signature is written in a cursive style and reads "Christine Goonrey".

Christine Goonrey
President
11 April 2008