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Northern Territory Parks 2022-52 Masterplan Consultation Paper Submission

The Arid Lands Environment Centre (ALEC) is Central Australia's peak community environmental organisation that has been advocating for the sustainable management of the arid lands since 1980. ALEC actively contributes to the development of Parks policy through regulatory reform, written submissions, community education and advocacy.

ALEC welcomes the opportunity to comment on the draft *Northern Territory parks 2022-2052 masterplan: What do you want from your Territory Parks and Reserves? Consultation paper* (2022-2052 Parks Masterplan). We acknowledge the extensive work completed by the Department in producing this consultation paper.

However, ALEC has concerns with the Parks Master Plan consultation paper in its current form. Our submission focuses on six key areas: conservation and biodiversity; the framing of the Parks Masterplan; background information; threats to Parks; regulatory reform; and consultations.

1. Conservation and biodiversity

All opportunities put forward in the consultation paper are unpinned by the health and condition of the natural and cultural values within the Parks estate. To be truly effective any Masterplan must embed the importance of biodiversity and conservation across all areas of its focus.

A Masterplan should support and enable the role Parks plays in protecting threatened species and acting as a refuge for biodiversity. Further opportunities for the fragmented Parks and reserve system to have greater integration and connectivity should also be considered.

ALEC members in an ALEC survey made their intentions clear around their concerns and priorities for the Parks estate. Some examples are included below:

"Biodiversity and conservation is the cornerstone of our Parks estate. An investment in protecting biodiversity is an investment in supporting our Parks to thrive."

"Conservation should be the main priority"

"My key concern is that the NT government sees our parks as a money making opportunity, with no concern about investing in their true purpose, which is conservation of native flora and fauna."

“Weed management - buffel in Central Australia, reducing impact of increase fires, preventing further losses in biodiversity”

“NT gov needs to properly fund weed and feral animal management in parks - the recent fires in Watarrka National Park were probably caused by a very manageable buffel infestation and the disastrous fires in Tjoritja NP a few years ago definitely were.”

Recommendation 1: The principal objective of the 2022-2052 Parks Master Plan must be effective biodiversity conservation.

2. Framing of the Parks Masterplan

A principle issue is that the Parks Masterplan consultation paper reads like the development of a tourism masterplan on the Parks estate. There is a significant imbalance between “activating businesses and economic opportunities”¹ which are central to consultation points and that of valuing conservation and biodiversity. The ecological values of Parks are seriously underrepresented in this consultation paper despite it being the core function of Parks. Without biodiversity and conservation there is no tourism industry in the Parks estate.

It is notable that this Masterplan has dropped ‘conservation’ from its title, compared to the *Northern Territory Parks & Conservation Masterplan: Summary Paper September 2005* (2005 Parks Masterplan). The 2005 Masterplan was structured around biodiversity and conservation values. Headings in that Masterplan emphasise this, for example: “why is it important to conserve our biodiversity?”, “Identifying priority areas for biodiversity conservation”, “partnerships in the conservation and sustainable use of biodiversity”, “biodiversity conservation on Aboriginal lands”, “enhancing research and monitoring for biodiversity conservation”, and so on and so forth. Marion Scrymgour the Minister responsible for the 2005 Parks Masterplan makes the priorities of the plan clear, “an underlying theme of the Masterplan is to ensure that the ecological health of the landscape - across all land tenures and seas - is maintained.”²

The Parks 2022-2052 Masterplan consultation paper does not present opportunities for visionary conservation leadership, and instead reads like a development document seeking endorsement. It isn’t strategic and asks specific questions with zero context (see section 2 on a lack of background information). The Parks Masterplan consultation paper goes as far as questioning whether “Territory parks and reserves [are] still expected to be the cornerstone of biodiversity conservation efforts or is this role now being filled by other types of land management?”³⁴ This is contrasted with the 2005 Parks Masterplan which states that “the core of the Masterplan identifies the most important areas of land for biodiversity conservation”.⁵

The 2022-2052 Parks Masterplan consultation paper abandons a holistic view of Parks, instead it proposes offloading responsibility of Parks to private stakeholders, consolidating the Parks estate and building the economic value of tourism where possible. The cost of this

¹ Northern Territory Parks 2022-2052 Masterplan: What do you want from your Territory Parks and Reserves? Consultation Paper, p.2.

² Northern Territory Parks & Conservation Masterplan: Summary Paper September 2005. p.3

³ *Ibid* p.6

⁴ Northern Territory Parks 2022-2052 Masterplan: What do you want from your Territory Parks and Reserves? Consultation Paper, p.22

⁵ Northern Territory Parks & Conservation Masterplan: Summary Paper September 2005. p.4

shift away from conservation is not questioned or considered. There are a number of decisions made before the public has had the opportunity to provide input, for example: “the Masterplan must have a focus on economic objectives”, the 10-year activation plan for ‘real projects’ has already been developed, and that private investment in parks is framed as the key way to improve the management of Parks. These assumptions have significant implications influencing the kind of Masterplan that will be drafted.

In addition, the Parks estate is framed as a negative asset for the Territory Government, when this could not be further from the case. Parks are key to the identity of the Northern Territory. The biodiversity, conservation and cultural values embedded within these spaces, underpin all other potential environmental, cultural, social and indeed economic benefits.

The 2022-2052 Parks Masterplan must not prioritise short-term economic development ahead of the health of the Parks estate. It is a 30-year plan that must have a vision for how Parks are to be protected and managed.

3. A lack of background information

The lack of context makes it very difficult to provide comment on the questions proposed in the Parks Masterplan consultation paper.

How is the community meant to comment on issues such as consolidation of the Parks estate, when we do not know beyond anecdotal evidence and our own observation what health the parks estate is in. Informed decision making is a cornerstone to good community consultation, this consultation paper did not address some key underpinning questions, i.e

- Are Parks in decline, neutral or improving?
- If the condition of Parks is changing, where and at what rate?
- What is the cause of the improvement or decline?
- Where are the priority areas for conservation and biodiversity?
- What are the primary risks and threats to our Parks?
- Is there a need for greater connectivity of our Parks?
- How would this be achieved?
- What is the economic analysis of Parks?
- What value do Parks bring?
- What is the economic analysis of the natural capital that they provide?

Whilst introducing a clear focus on economic development the 2022-2052 Parks Masterplan consultation paper failed to acknowledge that Parks are seriously underfunded. There has been a sustained erosion in the resourcing to Parks for decades. By not addressing the real investment demands in protecting parks public perception on sustainable development is potentially mis-led.

A Parks Masterplan should be based on evidence and scientific research. This consultation paper lacks any evidence base for the major changes it is proposing. Without being adequately informed community endorsement in any Masterplan draft is significantly compromised.

In addition, there is a lack of reporting around Parks, with very limited information publicly available. Monitoring and research should be key in underpinning changes made to Parks. Without greater available information, it is near impossible to provide constructive input into the strategic considerations required for the development of a successful 30-year masterplan.

4. Failure to consider threats to Parks

The consultation paper has not considered key threats to the Parks Estate. It does not provide background information or a plan for how weeds, feral species, fire or climate change are going to impact the viability of Parks over the next 30 years. This is a major omission.

It is not sufficient to merely say “the Parks and Wildlife Commission is aware that there are fire and pest issues that remain unaddressed as resources are limited. The Parks and Wildlife Commission intends to continue with a prioritised approach to managing pests and fires on parks and reserves”.⁶ There are 85 parks and reserves in the Northern Territory, greater consideration of how they will be managed is key.

Buffel grass for example is not mentioned in the 2022-2052 Parks Master Plan consultation paper. This is despite the fact that the arid zone is undergoing environmental collapse (as is the tropical savanna country), where buffel grass has been identified as one of the key threatening processes in the arid and semi-arid zone.^{7,8} Research has emphasised that buffel grass presents the greatest threat to arid-zone ecology, posing a greater risk than feral cats, foxes, rabbits, domestic and feral megafauna, other weeds and fire.¹⁰ Buffel grass is not a declared weed in the Northern Territory, but it is recognised as having a “very high” weed risk in the *Alice Springs Regional Weeds Strategy 2021-2026*.¹¹ How buffel grass and other weeds are to be managed must be considered in the 2022-2052 Parks Masterplan.

5. Regulatory reform: governance

Now 45 years old the *Territory Parks and Wildlife Conservation Act 1976* (TPWC Act) is no longer fit for purpose in protecting the Parks estate. ALEC welcome the modernisation of the TPWC Act. Modernising must also include embedding clear principles and objectives in the Act which recognise biodiversity and conservation values, as well as Aboriginal rights; enshrining monitoring and reporting duties into the Act to improve concerns around transparency and accountability; and, outlining rights and responsibilities for how protected areas are managed.

6. Consultations

It remains very unclear whether the Department has completed any form of consultation around the Parks Masterplan. No members that ALEC has engaged with has been aware that the Masterplan is to be drafted or was up for consultation. ALEC has concerns with the approach the Northern Territory Government is adopting, by using Have Your Say as its

⁶ Northern Territory Parks 2022-2052 Masterplan: What do you want from your Territory Parks and Reserves? Consultation Paper, p.22

⁷ Bergstrom, D.M., Wienecke, B.C., van den Hoff, J., Hughes, L., Lindenmayer, D.B., Ainsworth, T.D., Baker, C.M., Bland, L., Bowman, D.M., Brooks, S.T. and Canadell, J.G., 2021. Combating ecosystem collapse from the tropics to the Antarctic. *Global change biology*, 27(9), pp.1692-1703.

⁸ Department of Environment, 2015. THREAT ABATEMENT ADVICE FOR ECOSYSTEM DEGRADATION, HABITAT LOSS AND SPECIES DECLINE IN ARID AND SEMI-ARID AUSTRALIA DUE TO THE INVASION OF BUFFEL GRASS (*Cenchrus ciliaris* AND *C. pennisetiformis*).

⁹ Godfree, R., Firn, J., Johnson, S., Knerr, N., Stol, J. and Doerr, V., 2017. Why non-native grasses pose a critical emerging threat to biodiversity conservation, habitat connectivity and agricultural production in multifunctional rural landscapes. *Landscape Ecology*, 32(6), pp.1219-1242.

¹⁰ Read, J.L., Firn, J., Grice, A.C., Murphy, R., Ryan-Colton, E. and Schlesinger, C.A., 2020. Ranking buffel: Comparative risk and mitigation costs of key environmental and socio-cultural threats in central Australia. *Ecology and Evolution*, 10(23), pp.12745-12763.

¹¹ Alice Springs Regional Weeds Strategy 2021-2026, p10.

primary platform for engagement. While organisations may check this platform, the general public do not. This platform is even further alienating for communities based in remote areas, where English may not be their first language.

ALEC hopes that Aboriginal stakeholders have been consulted around the Parks Masterplan and are given explicit opportunity for input. The Parks estate interacts substantially with Aboriginal people through joint management, and any proposed changes should be the result of extensive consultation. The views and perspectives of Traditional Owners should underline proposed changes to Parks.

Similarly, ALEC is concerned with the way the Masterplan is filled with very leading questions, for example:

“Do our current joint management arrangements work and if not, why don’t they?”

“Do you think opportunities for new parks and reserves should be identified or is there already enough land set aside from production in the Territory?”

“Would you support rationalisation of our Territory parks or should we try to retain everything we have?”

“Are Territory parks and reserves still expected to be the cornerstone of our biodiversity conservation efforts or is this role now being filled by other types of land management?”

This is far from best-practice if the perspectives of stakeholders are to be heard.

7. Conclusion

The 2022-2052 Parks Masterplan must outline a vision and confront the key threats that will shape the Northern Territory’s Parks over the next 30 years. Namely: weeds, fire, feral animals, the condition of neighbouring properties and climate change. The process to draft the plan must provide opportunities to grapple seriously with questions around the underfunded and under resourced nature of Parks.

Absolving the Government as the responsible entity for managing parts of the Parks estate and boosting the role of private stakeholders, is not an adequate solution to current funding and resourcing challenges. NT’s world renowned parks and reserves is not simply the backbone of the tourism industry but also embodies many of the fundamental benefits that deliver livelihoods, livability and cultural identity of the Territory.

ALEC is concerned that there is a serious risk that the Parks Masterplan could completely miss the mark. The framing of the consultation paper almost entirely ignores conservation and biodiversity values, and instead focuses on the economic development of Parks. This approach is short-sighted and will result in significant challenges for NT Parks in the next 30 years.

The Territory should ambitiously aim to not just minimally conserve the existing estate but to seek opportunities to improve environmental condition; expand the parks network to ensure comprehensive coverage of ecosystems types found in the Northern Territory are protected and that conservation aims are adequately resourced.

Kind regards,

Alexander Vaughan
Policy Officer

A handwritten signature in black ink, appearing to read 'A. Vaughan' with a stylized flourish at the end.