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Draft Northern Territory Parks 2022-52 Masterplan 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 2022-52 Masterplan (Draft Masterplan). While some improvements have been made in developing the Masterplan, namely, in centring biodiversity and conservation in the Draft Masterplan, the plan still lacks urgency to adequately respond to the significant threats it faces. As Central Australia's peak environment centre we focus on biodiversity values within the Draft Masterplan.

First, we emphasise how much Territorians love their parks. Then, we consider positive contributions from the Draft Masterplan, before identifying opportunities around evaluation to better inform the Parks Masterplan. Finally, we consider key threats that have not been adequately addressed in the Draft Masterplan, focusing on biodiversity decline, climate change and resourcing issues.

1. Territorians love their Parks

From supporting threatened and endangered species in unique ecological niches, to the management of breathtaking arid, savannah and tropical landscapes, the Northern Territory's Parks are lauded around the world for their expanse, richness and unique natural and cultural values. It comes as no surprise then that Territorians (still) love their parks. This was demonstrated strongly in the previous round of submissions, with over 600 submissions received for the Parks 2022-2052 Masterplan Consultation Paper. It was clearly captured that:

'overall, respondents indicated they care deeply about Territory parks and reserves, shown both by the time and effort put in by so many people to respond to the call for feedback and by the nature of the responses made. People want their parks to stay and they want the biodiversity and cultural values respected and protected', going on further to say that 'a very high level of support was displayed for the view that the park estate should be considered as the cornerstone of biodiversity conservation in the Northern Territory'.

Similarly, in report cards that were completed in 2014, there were very high levels of visitors that were satisfied and very satisfied across five of the Territory's major parks. There was 95% satisfaction at Tjoritja/ West MacDonnell, 98% at Watarrka, 88% at Nitmiluk, 94% at Litchfield and 95% at

¹ **Department of Environment, Parks and Water Security, 2022, p.9.** Northern Territory Parks 2022-2052 Masterplan: Consultation Summary Paper. Northern Territory Government.

Casuarina². Visitors from the Territory and beyond continue to show significant appreciation for the Northern Territory's parks and reserves.

2. Welcome steps forward

We acknowledge that the Draft Masterplan does a much greater job in centering biodiversity and conservation than the Consultation Paper. Strong steps forward have been made in developing systems that will result in greater reporting and accountability. We also note these positive actions, which include:

- Commitments to increase operational support for rangers to manage fire, weeds and feral animals:
- Develop 10 year management plans, 5-year Integrated Country Strategies and annual action plans for all parks and reserves;
- Develop a climate change strategy
- Acknowledge the need to improve biodiversity and conservation outcomes across the parks estate;
- The application of two-way knowledge to inform adaptive management through monitoring and strategic research;
- Better public reporting;
- Establishing baselines for the Territory's Parks and reserves;
- Identifying research gaps.

In addition, the vision statement and the biodiversity values goals are welcome.

3. Evaluation and learning from the past

There is greater opportunity for the Draft Masterplan to heed messages from the past. If the Northern Territory Government believes that 'the Northern Territory's parks and reserves are vital to the Territory's future'³, then surely a 30-year masterplan should be informed by an honest and transparent review of its past operations. A 30-year plan should be based on place-based learnings and evidence. This approach would ensure that key barriers can be overcome and opportunities seized. For example, three key questions that would be helpful in informing the masterplan:

- What are the processes and systems that have worked that should be continued across the parks estate?
- What are the key barriers that have prevented the Territory's Parks from being better managed? And;
- How are current and emerging threats going to be (better) managed?

These high-level questions can then be supported by targeted questions around major projects and programs that Parks and Wildlife have undertaken over many years. For example, an evaluation of the program to manage the athel pine at Finke Gorge National Park could provide a useful case study for targeted weed projects. Similarly, for feral species management, an evaluation of feral donkey or

² **Department of Environment, Parks and Water Security, 2022.** 'Park Report Cards'. Accessed 10th June, 2022. https://depws.nt.gov.au/consultation-publications/parks-and-wildlife-publications/park-report-cards

³ **Department of Environment, Parks and Water Security, 2022, p.5.** Northern Territory Draft Parks 2022-2052 Masterplan. Northern Territory Government.

water buffalo control. Have these programs been effective in achieving their goals, and have they resulted in the best use of resources allocated? Why/ why not? These evaluations are an opportunity to focus upon the targeted works, and improve future plans and programs.

A 30-year Masterplan is a foundational document that should have its assumptions stripped back. Better managed parks will arise from learning from past mistakes in a positive and constructive manner. This may provide the step-change that is need to ensure the Territory's parks and reserves are 'a resilient and secure system of parks conserving the diversity of the Territory's unique natural and cultural values, providing a lasting legacy for future generations to experience, understand and enjoy'⁴.

Recommendation 1: An independent evaluation and review of Parks and Wildlife is completed.

4. Honesty about the major threats to Parks

The Masterplan does not adequately acknowledge the severe pressure the Territory's unique and diverse landscapes and its environments are under. These stressors are real and are already having devastating impacts upon the Northern Territory's parks. The lack of honest appraisal of these threats, completely hollows out any sense of urgency and ambition in the Draft Masterplan.

The three key threats are: (1) ecosystem collapse and biodiversity decline; (2) climate change; and 3) resourcing.

a. Ecosystem collapse and biodiversity decline

The dire state of the Northern Territory's environment has not been adequately acknowledged in the Draft Masterplan. In fact, it has almost been completely ignored. The Draft Masterplan is completely disconnected from the landscapes and ecosystems it is intending to protect and conserve. It is going to be an almighty task to reverse biodiversity decline and it will require long-term targeted commitments and resourcing. These are absent in the Draft Plan.

Three of the Northern Territory's iconic ecosystems are undergoing ecological collapse⁵. These are arid and semi arid, savannah and mangrove environments. Collapse is understood as an ecosystem which has undergone 'a change from a baseline state beyond the point where an ecosystem has lost key defining features and functions and is characterised by declining spatial extent, increased environmental degradation, decreases in, or loss of, key species, disruption of biotic processes, and ultimately loss of ecosystem services and functions'⁶. In Central Australia, this is due to temperature and precipitation changes, habitat change and loss, invasive species such as buffel grass, livestock, agriculture and water extraction⁷. Reversing biodiversity collapse across the Territory's Parks should be the central aim of any parks masterplan. In Central Australia, Watarrka, Finke Gorge and Tjoritja/ West MacDonnell National Parks are just three parks that are overrun by weeds. Ongoing decline in these values will guarantee a long-term decline of the Northern Territory's Parks.

'Since colonisation, Australia has lost 34 mammals, which is about the same number as the rest of

⁴ Ibid, p.10.

⁵ Bergstrom, D, Wienecke, B, van den Hoff, J, Hughes, L, Lindenmayer, D, Ainsworth, T, Baker, C, Bland, L, Bowman, D, Brooks, S, and Canadell, J. 2021. Combating ecosystem collapse from the tropics to the Antarctic. Global change biology, 27(9), pp.1692-1703.

⁶ Ibid, p.1693.

⁷ Ibid, p.1694.

the world combined over the past 200 years', 10 of these are in Central Australia, with a further 8 extinct in the Northern Territory ($Table\ I$)⁸. This places Central Australia at the forefront of mammalian extinction in the world. See below a list of the eighteen impacted species:

Table 1. Extinction of mammals within Central Australian and/or the Northern Territory⁹

Number	Extinct	Extinct in NT
1	Burrowing bettong (inland) Bettongia leseur graii	Brush-tailed bettong Bettongia penicillata
2	Central Hare wallaby Lagorchestes asomatus	Fawn hopping-mouse Notomys cervinus
3	Crescent nailtail wallaby Onychogalea lunata	Kowari Dasyroides byrnei
4	Desert bandicoot Permeles eremiana	Mala (extinct in wild) Lagorchestes hirsutus
5	Desert bettong Bettongia anhydra	Numbat <i>Myrmecobius fasciatus</i>
6	Lesser bilby Macrotis leucura	Red-tailed phascogale Phascogale calura
7	Lesser stick-nest-rat Leporillus apicalis	Shark Bay mouse Pseudomys fieldi
8	Long-tailed hopping mouse Notomys longicaudatus	Western quoll Dasyurus geoffroii
9	Pig-footed bandicoot Chaeropus ecaudatus	
10	Short-tailed hopping mouse Notomys amplus	

We can also add in the thick-billed grasswren (*Amytornis modestus modestus*) as another Central Australian species that has gone extinct, or the 141 other threatened fauna or 84 threatened flora species in the Northern Territory. If Parks are to have a role and be at the forefront of conservation and biodiversity, then they must play an urgent and active role in biodiversity and landscape management. This requires a step-change with targeted commitments and plans. A vague commitment to ending extinction within the parks estate in 30-years is simply not sufficient. How many species are going to go extinct in the next 30-years across the Territory's Parks in the mean time?

⁸ Foley, M, 2020. 'Why is Australia a global leader in wildlife extinctions?' Sydney Morning Herald.

⁹ Northern Territory Government, 2021. 'Threatened animals'.

Reversing biodiversity decline and stopping extinctions should be the urgent priority of Parks (see recommendation 7). It ought to be central to the justification of any masterplan or strategy. Instead, the issues are sidelined and addressed through non-committal targets that may or may not ever be achieved twenty to thirty years in the future.

Ecosystem collapse and extinction crisis is the current reality for the Northern Territory's parks. It is important to note that there are other threats such as land clearing outside of the parks estate place even greater on the biodiversity and conservation role that parks and reserves play.

Recommendation 2: Develop specific strategies around extinction prevention and reversing biodiversity decline across the parks estate

b. Climate change risk and impacts

Climate change presents an existential threat to the Northern Territory's parks.

While the Territory is already a place of climate extremes, climate change is increasing the intensity, frequency and variability of climatic events¹⁰. In Central Australia this means hotter temperatures, more intense heat events, longer periods in drought, more intense rainfall events, more erratic rainfall and aquifer recharge, an increase in the likelihood of major flood events, drier soils, increased evapotranspiration, more wildfires and increased risks of erosion¹¹.

In January 2019, the average daily maximum temperature in Alice Springs was 41.5°C, 5°C above the average maximum temperature for January¹². Under a high emissions scenario, by the end of the century we can expect every second day in Alice Springs to be above 35 degrees, nearly double the historical average¹³. Tennant Creek and Elliott will see close to an extra 100 days above 35°C across the same period¹⁴. In Alice Springs between 1989-2018, there were six-times more days above 44°C than between 1959-1988¹⁵. Tennant Creek across the same period has experienced 7 days a year above 44°C compared to zero in the 30 years prior¹⁶. Alice Springs has warmed by 2°C comparing the annual maximum temperatures between 1942-1951 and 2012-2021¹⁷ and similar trends can be found across Central Australia. The impacts of climate change are already being felt across the Northern Territory.

In Central Australia under a high-emissions scenario, by 2046-75 climate change is modelled to: reduce median rainfall by 5-10%, with minor reductions in summer and major reductions in winter rain; reduce mean annual runoff by 5-20%; result in a 5-20% decrease of median flows during dry years, and a 5-50% increase in median flow during wet years ¹⁸. During very dry and very wet years a >50% decrease and >50% increase in flows can be expected respectively ¹⁹. This may have substantial water insecurity implications for environments and ecosystems that are dependent on shallow

¹⁰ Intergovernmental Panel on Climate Change, 2022. 'Chapter 11: Australasia'. IPCC WGII Sixth Assessment Report: Full report.

¹¹ **CSIRO. 2020.** 'Climate change in the Northern Territory: State of the science and climate change impacts'.

¹² Bureau of Meteorology. 2021. 'Climate data online: Monthly mean maximum temperature: Alice Springs Airport'. Accessed March 2022.

¹³ CSIRO. 2020, p.14. 'Climate change in the Northern Territory: State of the science and climate change impacts'.

¹⁴ Ibid.

¹⁵ Ibid.

¹⁶ Ibid

¹⁷ Bureau of Meteorology. 2021. 'Climate data online: Monthly mean maximum temperature: Alice Springs Airport'. Accessed March 2022.

¹⁸ Zheng, H, Chiew, F, Potter, N, Kirono, D, 2019. 'Projections of water futures for Australia: an update.

¹⁹ Ibid.

groundwater systems and recharge.

Increased temperatures, more heatwaves and longer time spent in drought, combined with more erratic and variable rainfall result in a high likelihood that 'fire weather will become more frequent and harsher' in the Northern Territory²⁰. The *Climate change in the Northern Territory: State of the Science and climate change impacts report* goes further stating that:

'in the southern and central parts of the Territory changes to fire frequency depend on rainfall changes. With higher temperatures and lower rainfall, climate change will result in a harsher fire-weather climate in the future; that is, when bushfires occur, more extreme fire behaviour can be expected'²¹.

Wildfires place the Northern Territory's unique, diverse and threatened environments at risk, while infrastructure that supports tourism, land management and remote communities will also be under threat (e.g. 2021 wildfires at Watarrka, 2018-19 wildfires in the West MacDonnell Ranges).

The previous Minister for Environment, Climate Change and Water Security, Eva Lawler echoed a strong warning, stating 'if we don't do anything [about climate change], the NT will become unlivable'²². The realities of climate change are stark with its impacts cascading and compounding, further threatening already at-risk ecosystems²³. It is not an exaggeration to state that climate change presents an existential threat to the Territory's future. It is the Territory's parks and reserves that will play a critical role acting as refugia for biodiversity and conservation in an increasingly climate-changed world.

The impacts of climate change are dire and were not adequately addressed in the Draft Masterplan. While developing a climate change strategy is welcome, the Parks Masterplan needs to go further in addressing the climate change threat. The language is currently too vague and could be interpreted very differently from whatever stakeholder is asked. In addition to a high-level strategy, key actions include commitments to develop a:

- Climate change vulnerability assessment for all the Territory's parks and reserves;
- Climate change risk assessment for the Parks and Wildlife's operations;
- Climate change and biodiversity and landscape decline report is completed;
- New climate change model that will provide key insights into climate mitigation and adaptation for all Departments across the Northern Territory Government. Parks can play a key role in advocating for this work to be completed;
- Action plan to protect ecological and culturally significant sites (where appropriate) within the Parks estate from the impacts of climate change;
- Action plan to reverse biodiversity decline and stop extinctions across the Northern Territory's parks.

The Draft Masterplan does not promote a step-change in its approach to the risks posed by climate change. Rather it acts as if the impacts of climate change are a future event and not a current reality,

²² Allam, L, Evershed, N, Bowers, M, 2019. 'Too hot for humans: First Nations people fear becoming Australia's first climate refugees'. The

²⁰ CSIRO. 2020, p.21. 'Climate change in the Northern Territory: State of the science and climate change impacts'.

²¹ Ibid.

²³ Intergovernmental Panel on Climate Change, 2022, p.3. 'Chapter 11: Australasia'. IPCC WGII Sixth Assessment Report: Full report.

for example, the Masterplan states that 'modelling suggest the impacts of climate change will be observed well within the timespan of this Masterplan'²⁴. The lack of acknowledgement or understanding of the current threat, ensures that any sense of urgency is absent in this 30-year Masterplan. This is a major problem, as these next decades are to be some of the most formative as we prepare for worsening climatic impacts.

<u>Intergovernmental Panel on Climate Change report Climate Change 2022: Impacts, Adaptation and Vulnerability</u>

New and updated scientific reporting by the Intergovernmental Panel on Climate Change (IPCC) serves as a stark reminder of the climatic trends impacting Australia. This new report emphasises that a 'step change' is required to mitigate and adapt to the impacts of climate change. Early investment and planning will minimise costs and promote opportunities. The report's focus on vulnerability is particularly relevant to the Northern Territory. The report states that²⁵:

- 1. 'Ongoing climate trends have exacerbated many extreme events (very high confidence)';
- 2. 'Climate trends and extreme events have combined with exposure and vulnerabilities to cause major impacts for many natural systems, with some experiencing or at risk of irreversible change in Australia (very high confidence)';
- 3. 'Climate trends and extreme events have combined with exposure and vulnerabilities to cause major impacts for some human systems (high confidence)'.
- 4. 'Climate impacts are cascading and compounding across sectors and socio-economic and natural systems (high confidence). Complex connections are generating new types of risks, exacerbating existing stressors and constraining adaptation options';
- 5. 'Increasing climate risks are projected to exacerbate existing vulnerabilities and social inequalities and inequities (high confidence)';
- 6. 'Further climate change is inevitable, with the rate and magnitude largely dependent on the emission pathway (very high confidence)';
- 7. 'Climate risks are projected to increase for a wide range of systems, sectors and communities, which are exacerbated by underlying vulnerabilities and exposures (high confidence)';
- 8. 'There are important interactions between mitigation and adaptation policies and their implementation (high confidence)'.

These challenges and solutions were identified:

- 9. 'The ambition, scope and progress of the adaptation process has increased across governments, non government organisations, businesses and communities (high confidence)';
- 10. 'Adaptation progress is uneven, due to gaps, barriers and limits to adaptation, and adaptive capacity deficits (very high confidence)';
- 11. 'A range of incremental and transformative adaptation options and pathways is available as long as enablers are in place to implement them (high confidence)';
- 12. 'New knowledge on system complexity, managing uncertainty and how to shift from reactive to adaptive implementation is critical for accelerating adaptation (high confidence)';
- 13. 'Aboriginal and Torres Strait Islander Peoples and Tangata Whenua Māori can enhance

²⁴ **Department of Environment, Parks and Water Security, 2022, p.12.** Northern Territory Draft Parks 2022-2052 Masterplan. Northern Territory Government.

²⁵ Intergovernmental Panel on Climate Change, 2022, p.3-6. 'Chapter 11: Australasia'. IPCC WGII Sixth Assessment Report.

- effective adaptation through the passing down of knowledge about climate change planning that promotes collective action and mutual support across the region (high confidence)';
- 14. 'A step change in adaptation is needed to match the rising risks and to support climate resilient development (very high confidence)';
- 15. 'Delay in implementing adaptation and emission reductions will impede climate resilient development, resulting in more costly climate impacts and greater scale of adjustments (very high confidence)'

Recommendation 3: Conducting a climate change vulnerability assessment for all the Territory's parks and reserves is added to the Parks Masterplan;

Recommendation 4: Conducting a climate change risk assessment for the Parks and Wildlife's operations;

Recommendation 5: A climate change impacts upon biodiversity and landscapes report is completed

Recommendation 6: Parks and Wildlife advocates for new climate modelling to be conducted across the Northern Territory

Recommendation 7: Emerging out of the climate change vulnerability assessment, an action plan to protect ecologically and culturally significant sites across the parks estates from the impacts of climate change is developed.

Recommendation 8: Emerging out of the climate change vulnerability assessment, an action plan to mitigate biodiversity decline and the extinction threats across the parks estate is developed.

c. Resourcing

Unless the resourcing issues that have plagued parks are adequately addressed, there is limited optimism that change will occur. Parks are a public good that require strong investment. The role of parks and reserves as refugia for biodiversity (and humans) is only going to increase as temperatures increase and the climate becomes more variable. Investment in parks is an investment in public space and biodiversity conservation. While investment has increased in the 2022-23 budget for Parks due to the new payment systems, parks are going to require a step-change in investment to counter the major threats listed above.

While there is limited reporting on parks publicly available, what is available makes it clear how extremely underfunded parks are. In 2014, a series of report cards were developed for six major parks across the Northern Territory. They were Tjoritja/ West MacDonnell, Watarrka, Nitmiluk, Litchfield, Judburra/ Gregory and Casuarina²⁶. Table 2 provides an overview of these parks and the number of rangers present.

While these figures are outdated, they are suggestive of the major issues that constrain parks. At Watarrka, there are less than 5 rangers to manage nearly a quarter of a million tourists as well as manage the parks estate there, which includes many ecologically and culturally significant sites. 4-5 staff can never succeed in stopping the buffel grass crisis that is unfolding at Watarrka. Similarly at Tjoritja, there are 9 rangers to manage a 225km hiking trail that includes 12 trail heads, as well as

²⁶ **Department of Environment, Parks and Water Security, 2022.** 'Park Report Cards'. Accessed 10th June, 2022. https://depws.nt.gov.au/consultation-publications/parks-and-wildlife-publications/park-report-cards

countless campsites and all the other day-trip destinations along Tjoritja. The Larapinta trail is an extremely popular trail that navigates very remote environments. It brings tourists from across the country to Central Australia. Despite this, it remains majorly underfunded to actually do biodiversity and conservation work.

Table 2: Park Report Cards 2014 - Overview

	Number of visitors	Size (hectares)	Number of Rangers	Hectares per rangers	Visitors per ranger	Visitor satisfaction
Tjoritja/ West MacDonnell	139,400	252,800	9.3	28,089	15,000	95%
Watarrka	237,000	105,000	4.8	21,875	49,520	98%
Nitmiluk	246,900	295,000	13	22,700	19,000	88%
Litchfield	329,000	145,000	9	16,100	36,600	94%
Judburra/ Gregory	30,900	1,300,000	5.9	220,300	5200	N/A
Casuarina	935,000	1361	3.2	425	292,200	95%

Table 3 provides a breakdown on ranger time across these 6 parks. Table 4 unpacks the programs that rangers spend their time on when they say they are doing 'biodiversity' matters. Table 5 highlights how much time was spent on each biodiversity program as a percentage of all ranger time.

These results make it abundantly clear how under-resourced parks were at this point in time. In Tjoritja, only 1% of rangers' time was spent on fire management, 5% on weeds, 2% on ferals, 10% on planning and 2% on monitoring and research. At Watarrka, 3% of time is spent on fire management, 5% on weeds, 4% ferals, 3% planning, 0% on research and monitoring and 5% on the mala program.

The rangers are set-up to fail. They have so little time to actually deal with threats, let alone time to evaluate (i.e. research and monitoring) whether what they are doing is actually effective. Rangers do a phenomenal job with the very limited resources they have, however this arrangement is not sustainable.

Despite major underinvestment in parks, we hear that even then parks are struggling with high turnover and recruiting new staff. The unsustainable arrangement illustrated above provides some insight as to why that may be the case where rangers spend limited time on core activities (i.e. fire management, weeds management, research, monitoring and so on).

Parks need to be adequately resourced so that the Draft Masterplan's visions and goals can be achieved. Evaluating how Park's operations have succeeded and failed in the past (Recommendation 1) would be very useful in ensuring that parks are significantly better managed over the next 30-years.

 Table 3: Park Report Cards 2014 - Ranger time

	Biodiversity %	Cultural heritage %	Visitors %	Stakeholders %	Administration %	Number of rangers
Tjoritja/ West MacDonnell	20	5	30	10	35	9.3
Watarrka	20	2	43	15	20	4.8
Nitmiluk	23	2	60	5	10	13
Litchfield	20	4	60	1	15	9
Judburra/ Gregory	55	5	20	5	15	5.9
Casuarina	15	5	65	10	15	3.2

Table 4: Park Report Cards 2014 - Ranger time: biodiversity programs

	Fire %	Weeds %	Feral animals	Planning %	Research/ monitoring %	Other %
Tjoritja/ West MacDonnell	5	25	10	50	10	0
Watarrka	15	25	20	15	0	25
Nitmiluk	30	49	10	10	1	0
Litchfield	45	25	5	10	15	0
Judburra/ Gregory	30	50	5	10	5	0
Casuarina	30	45	0	10	5	10

 Table 5: Park Report Cards 2014 - time spent on biodiversity programs as a percentage of ranger time

	Fire %	Weeds %	Feral animals	Planning %	Research/ monitoring %	Other %
Tjoritja/ West MacDonnell	1	5	2	10	2	0
Watarrka	3	5	4	3	0	5
Nitmiluk	6.9	11.3	2.3	2.3	0.2	0
Litchfield	9	5	1	2	3	0
Judburra/ Gregory	16.5	22.5	2.75	5.5	2.75	0
Casuarina	9	13.5	0	3	1.5	10

5. Conclusion

The Draft Masterplan makes some positive contributions in establishing better systems for the management of Parks and overcoming long-term barriers for improved management. The development of baselines, improved reporting and planning, increased operational funding and the identification of research gaps are welcome commitments. It is important to note, that they also demonstrate how poor the current arrangements are for parks and reserves across the Northern Territory.

While some of these commitments are welcome, the Draft Masterplan lacks urgency and does not adequately address some of the key threats and issues facing Parks. For example, we reiterate that a plan to stop extinctions across the parks estate in 30-years is not good enough. Each threat that we identified (biodiversity decline, extinction, climate change and resourcing) are interrelated and require long-term planning and commitments to overcome. The current Draft Masterplan does not do this.

We also make suggestions around evaluation, which we consider to be a key tool that is underutilised in the Draft Masterplan. It is essential that time and resources are not wasted repeating past mistakes in the systems, programs and plans that are developed.

The Parks Masterplan is an opportunity to reverse the trend and build a positive future for the Northern Territory's Parks. We look forward to further collaboration in this space.

Kind Regards,

Alex Vaughan

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Policy Officer