



31 May 2022

Parks and Wildlife Commission
Parks Masterplan
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Mode of delivery

Email to: parkplanning@nt.gov.au

To Whom it May Concern,

Submission in relation to Phase 2 consultation of the NT Parks Draft Masterplan (Masterplan)

Thank you for the opportunity to provide a final submission in relation to the NT Parks Draft Masterplan 2022 – 2052 (**Masterplan**).

The Environment Centre NT (**ECNT**) is the peak community sector environment organisation in the Northern Territory, raising awareness amongst community, government, business and industry about environmental issues and assisting people to reduce their environmental impact and supporting community members to participate in decision making processes and action.

The Northern Territory has some of the most biodiverse and unique landscapes in Australia, and the world. NT Parks, reserves and other protected areas are an integral part of the Territory lifestyle and to the health of our ecosystems. They provide essential “ecosystem services” (benefits of nature) including by protecting our rivers, coasts, forests and soils. They are vital to the survival of the Territory’s unique fauna and flora – found nowhere else in the world – and to our valuable tourism industry. Nitmiluk, Litchfield, Umbrawarra, Douglas River and Daly River, Cutta Cutta Caves, Judbarra, Keep River, Fine Gorge, Ormiston Gorge, Watarrka, and Limmen National Park are all key to the way we understand ourselves as Territorians, and others see us. They are iconic on a national and international scale.

The overwhelming public response to the NT Parks Masterplan Consultation round 1 clearly demonstrates the community’s love and passion for our parks and reserves. ECNT congratulates the Department for what is, on the whole, a strong draft Masterplan that accurately reflects community priorities and values. **Most notably, the draft Masterplan reflects that the conservation of nature and biological diversity is of critical importance to Territorians.**

Territory Parks are more than a source of pride and enjoyment for Territorians. These iconic, world-class landscapes of outstanding natural beauty and cultural heritage form an important part of our identity. These irreplaceable landscapes with embedded natural and cultural values are worthy of well-resourced care and protection in perpetuity. This has been acknowledged in the Draft Masterplan, and ECNT congratulates the Department on this impressive work. The Draft Masterplan 2022-52 establishes a long-term strategy for Territory parks and reserves. As much as is possible through a non-statutory plan, this Draft Masterplan is a commitment to respect and value the rich natural and cultural assets Territory Parks offer. In particular – having clear, outcomes focussed targets defined for each section of the report is a welcome approach and makes each commitment time bound.

This submission will provide some overarching comments, and then provide feedback on some of the specific targets set out in the draft Masterplan.

1. Our biodiversity is in crisis: the urgent need for urgent regulatory reform

While the Draft Masterplan demonstrates a welcome commitment by the Northern Territory Government to the upkeep of conservation and cultural values across the parks estate, however, it also highlights a central issue of conservation concern – that protected areas are not enough to conserve the Northern Territory’s biodiversity.

Recent research demonstrates that the Northern Territory’s biodiversity is at, or indeed past, a tipping point. The publication of *Into Oblivion: the disappearing mammals of Northern Australia*¹ over a decade ago, which demonstrated an unprecedented wave of mammalian extinction affecting Northern Australia, should have been a clarion for immediate action by the Northern Territory Government. However, plans to enact and implement a biodiversity conservation strategy and strong native vegetation laws were abandoned, and do not appear to have been resuscitated.

Since then, the situation has worsened. Land clearing is on the rise, facilitated by weakened approvals for pastoral land clearing, destroying critical habitat and accelerating species decline. Feral weeds such as gamba and buffel grass are accelerating their hold on the Territory landscape, causing hot fires that destroy biodiversity and critical habitats, perhaps irreparably. Feral animals such as cats, pigs, buffalo and cane toads have taken over our special places, with significant impacts on flora and fauna. Last year, a landmark report indicated that Northern Australia’s tropical savannas, arid zone and coastal mangroves are three of 19 ecosystems in Australia that meet the criteria of being under collapse. Climate change is projected to have significant impacts on the biodiversity of the Northern Territory by as early as 2030 and extreme impacts by 2070, including increased droughts, changed fire regimes, erratic rainfall and extreme temperatures.² Bergstrom et al suggest that it is imperative to understand how different threatening processes combine cumulatively (acting in what they term “threat webs”) to further threaten Australia’s collapsing ecosystems. As habitats become increasingly fragmented, populations become more vulnerable to other threatening processes, such as climate change, changes in stream flow regimes, predation by invasive species and destructive fires, and they lose the ability to recolonise suitable habitat. It is a grim picture indeed.

The declaration of Parks through the *Territory Parks and Wildlife Conservation Act (1978)* is the central pillar for achieving biodiversity conservation by the Northern Territory government. However, we are rapidly losing many species across the Parks estate and across the Northern Territory more broadly. The Northern Territory community is well aware of the state of our nature and frustrated by continued government inaction. Our children hear stories of possums and bandicoots stealing bread from the campsites, but now rarely get to experience these delightful creatures for themselves. We hear stories of travellers embarking on the Jatbula Trail excited to meet the wildlife, only to complete the hike in tears, having not sighted a single animal. The available long-term monitoring data provides strong evidence to support these anecdotes. The development of the Draft Parks Masterplan takes us one step in the right direction. The next step is the long overdue review of the relevant legislation.

ECNT commends the work of the Northern Territory government for delivering on their 10-year environmental regulatory reform agenda. Now that the regulatory reform for the EP Act 2019 is complete,

¹ <https://www.natureaustralia.org.au/content/dam/tnc/nature/en/documents/australia/Into-Oblivion.pdf>.

² Bergstrom et al. 2021. "Combating ecosystem collapse from the tropics to the Antarctic." *Global change biology* 27(9):1692- 1703.

it is time to embark on best-practice biodiversity law reform. Effective biodiversity law will complement the new EP Act, enshrining our Parks and the embedded natural and cultural values within a progressive framework based on achieving overall positive outcomes for nature.

The NT is one of the only jurisdictions in the country that does not have specific nature conservation laws, habitat (native vegetation) laws or an overarching government position or strategy on biodiversity. Every other jurisdiction around the country has a state Threatened Species Plan or a Threatened Species Scientific Commissioner. Additionally, every other jurisdiction has the legislated requirement to undertake State of the Environment Reporting as a means for tracking changes in biodiversity trends over time and informed environmental decision-making. Unfortunately, the NT is a standout for our lack of nature safeguards, despite us being the 'nature' Territory. Aside from declaring protected areas, the government's environmental program is largely regulatory and retroactive. Development applications are assessed discretely, with in-depth scientific consideration of the spatiotemporal cumulative impacts on ecosystems and species still rare. There is no overarching biodiversity framework with clear goals and measurable targets to ensure genuine ecologically sustainable development. What is needed is a strategic, forward-looking approach: An overarching set of enforceable standards that values biodiversity, healthy ecosystems and celebrates the unique and extraordinary nature of the Territory. The Parks Draft Masterplan and protected areas would be one valuable component within this strategy.

The review of the Territory Parks and Wildlife Conservation Act is a golden opportunity for the Northern Territory to modernise the only conservation legislation that exists and bring it in line with best practice. Modernised, 'next generation' biodiversity laws are urgently required that accurately reflect the deep connection that Territorians have with their lands and waters. A modern, overarching biodiversity conservation and land management legislative framework will necessarily involve mechanisms that:

- Centre Aboriginal land and sea management and prioritises the aspirations, rights and interests of Traditional Owners and Aboriginal communities.
- Allow for bioregional conservation planning to identify key natural and cultural assets that communities wish to protect as well as landscape features that are essential for the ongoing survival of species;
- Enshrine the bioregional conservation planning in statute with an emphasis on strong community representation or locally led governance arrangements.³

ECNT recently secured funding to undertake a biodiversity law reform project, aimed at achieving stakeholder and community support for this legislation. ECNT is keen to work collaboratively with the Northern Territory Government towards achieving these objectives.

2. The need for resourcing, accountability and implementation

ECNT is concerned that, although there are specific and time-based targets in the draft Masterplan, there is no monitoring and implementation schedule, and there is no indication of the funding commitment to ensure it is appropriately resourced. It is common in the Northern Territory for strategies to be developed, and then sit on the shelf gathering dust. To ensure that this does not occur, it is crucial that there are transparent accountability measures taken, including:

³ For further analysis, and ideas regarding how this legislation should work, see:

<https://www.edo.org.au/publication/a-biodiversity-conservation-and-land-management-act-for-the-northern-territory/>.

- (a) the establishment of a steering group made up of key Northern Territory stakeholders to oversee implementation of the draft Masterplan, and ensure that objectives are met, and that the community is involved in its implementation.
- (b) regular reporting to the Northern Territory community against targets and objectives.
- (c) that the Northern Territory Government must explicitly commit to funding sufficient staff to ensure that the draft Masterplan is implemented.

3. Natural Biodiversity Values – Management Effectiveness Framework and Climate Change Strategy

ECNT supports the development of a Management Effectiveness Framework (2024). It will, however, be critical that the management effectiveness framework is available for public consultation. ECNT is also strongly of the view that the proposed steering group (referred to at 2 above), should be involved in the development of the Management Effectiveness Framework before it goes out for public consultation.

The framework will need to explicitly address the following issues, some of which the Masterplan refers to in the latest Draft:

- Mammalian Extinction Crisis
 - Incorporation of sites of conservation significance.
 - The vitality of key biodiversity areas and critical habitats for threatened species within and outside of the park's estate.
- Collapsing Ecosystems
 - The vitality of key biodiversity areas and critical habitats for threatened species within and outside of the park's estate.
 - Cumulative impacts from threatening processes including agriculture and industrialisation of the pastoral estate.⁴
- Climate Change
 - Frequent hot and damaging fires.
 - Soil erosion.
 - Changes to the water table.
- Threatening Processes:
 - Wildfires
 - Weeds
 - Feral animals

The planned Climate Change Strategy (by 2025) will be an important roadmap for the parks estate under increasing climate change impacts. However, managing the impacts of climate change – notably wildfire management – requires an integrated approach with neighbouring landholders. A strong community consultation process should be undertaken in the development of the strategy that includes neighbouring landholders and incorporates their concerns and local knowledge of climate impacts. A critical part of the Parks climate change strategy should be the identification, mapping, and protection of essential climate refugia for flora and fauna across the entire parks estate. Naturally occurring climate refugia, such as rocky escarpments, springs, and wetlands, should be protected and secured as the highest priority as this is

⁴ Pintor, Anna et al. 2019. "Prioritising threatened species and threatening processes across northern Australia: User guide for data." James Cook University, Townsville. <https://www.nespnorthern.edu.au/wp-content/uploads/2020/04/Prioritisingthreatened-species-and-threatening-processes-across-northern-Australia-User-guidefor-data.pdf>

where species are able to persist. This strategy will need to be enforceable, either through monitoring, evaluation, and reporting or an alternate 'intervention strategy'.⁵

The biodiversity baseline assessment and Monitoring, Evaluation, Reporting and Improvement (MERI) program are critical activities and should be prioritised as being of upmost importance. The NT Parks form part of the national reserve system, which are a safety net against our biggest environmental challenges and a keyway in which Australia's biodiversity is conserved.

The parks and reserves baseline assessment should not be evaluated in isolation. The rapid and severe decline of small mammals from Kakadu is a symptom of far-reaching biodiversity loss across Northern Australia more broadly. It will be critical to consider declining biodiversity across the Northern Territory in order to achieve the target of zero extinctions. An absolute on-going commitment to at least 3 yearly biodiversity monitoring with a focus on target taxa must be recognised as core business, as much as fire, weeds and feral animal control, so that management interventions can be linked to biodiversity outcomes. A synthesis report from the monitoring data should be made publicly available through regular 'State of our Parks' reporting.

A measure of the 'adequacy' of protected areas is to ensure that life-cycle requirements of threatened species are provided for within the parks estate. Should listed threatened species not be found to occur across the parks estate, especially those from the most at risk taxa (small mammals, granivorous birds and fire sensitive plants), then consideration must be given to protecting habitat within known areas of occupancy for these species. Once again, the antiquated Territory Parks and Wildlife Conservation Act 1978 is unlikely to meet the challenge. New legislation that facilitates bioregional conservation planning, or integrated catchment management will be essential in order to meet this target. Threatened species do not only occur across the parks estate, as such, this target needs to be Territory-wide. Effective management and species-specific interventions will necessarily occur on parks, but this should be within a Territory wide management framework for threatened species – with the ultimate goal of no extinctions in the Northern Territory, ever.

As the Northern Savanna is on the precipice of collapse and there is a mammalian extinction crisis, time is of the essence.⁶ If the baseline assessment was expedited that would radically increase the achievability of the 2052 target of 'zero extinctions of native wildlife within the parks estate.' It is important to reiterate that these targets will only be achieved if there is effective off park conservation measures implemented; achieved through forward-looking bioregional conservation planning mechanisms.⁷

4. Tourism

It will be critical that the Northern Territory Government are transparent about Tourism opportunities and partnerships, with the general community being incredibly wary of any attempt to privatise our National Parks. It is feared that if our parks are privatised the important role that our reserve system plays as a

⁵ Gunningham, N. 2011 'Enforcing Environmental Regulation'. *Journal of Environmental Law*, 23: 2, 169-201
<https://academic.oup.com/jel/article/23/2/169/426247>

⁶Bergstrom, D.M., et al. 2021. "Combating ecosystem collapse from the tropics to the Antarctic". *Glob. Change Biol.*, 27: 1692-1703. <https://doi.org/10.1111/gcb.15539>

Fitzsimons, James et al. 2010. "Into Oblivion? The disappearing native mammals of northern Australia". *ResearchGate*.
https://www.researchgate.net/publication/256120679_Into_Oblivion_The_Disappearing_Native_Mammals_of_Northern_Australia

⁷ Gunn, I. 2013. 'Private land is an important piece of the conservation jigsaw' <https://theconversation.com/private-land-is-an-important-piece-of-the-conservation-jigsaw-11572>

safety net for our biodiversity will be undermined. This article provides a tangible example of the complexities and risks associated with commercialisation of the parks estate.⁸

5. Growing the Estate

The 7% target lacks ambition and is not in line with best practice for biodiversity conservation nor meets the standards set by other states and Territories around Australia.

Many of the Northern Territory's bioregions are represented poorly in our protected areas. This is particularly so in areas which are projected to be subject to significant agricultural development (including for cotton). According to data produced by the WWF, only 10.47% of the Daly Basin is protected, 1.77% of the Mitchell Grass Downs, 8.44% of the Ord Victoria Plain, 2.2% of the Davenport Murchison bioregion, and 0.70% of the Sturt Plateau. This is inconsistent with the targets of the Convention on Biological Diversity, to which Australia is a signatory. ECNT joins with WWF in calling for the Territory Government to commit to a target of protecting 30% of all Territory bioregions.

The Draft Masterplan notes that some bioregions remain drastically underrepresented or not represented at all within the parks estate. Marine bioregions in particular are vastly under-represented in the NT. In order to achieve a comprehensive, adequate and representative reserve system, the Territory Parks estate will need to expand and incorporate these underrepresented areas. While the 'comprehensive, adequate and representative' principles for reserve system acquisition remain important, there are other measures by which to ensure boosted biodiversity outcomes for the Territory. An analysis by the Department of important areas for biodiversity was completed some time ago and there are 67 recognised 'Sites of Conservation Significance'. These sites are earmarked as 'needing further protection' ([Introduction | NT.GOV.AU](#)). Only 7 of these sites occur within National Parks. A high priority should be the protection of these important biodiversity areas and if appropriate, inclusion into the parks estate. If it is not possible or appropriate to include these Sites of Conservation Significance within protected areas, the Territory Parks and Wildlife Conservation Act 1978 will require a major overhaul to ensure effective legislative protections can be afforded to these important areas.

Consistent with the Convention Biological Diversity draft target, growing the estate should include bringing at least 30% of each of the Territory's bioregions on land and sea under ecologically representative, well connected, effectively and equitably managed systems of protected areas, with an emphasis on key biodiversity areas and critical habitats for threatened species.

6. Joint Management

We support the NLC's submission on the Parks Masterplan consultation paper recommendations on joint management with traditional owners, which reads:

- extending the PWCNT's legislative scope as it relates to joint management to incorporate Aboriginal leadership, employment and economic development;
- building the governance capacity of joint management partners;
- developing a process to improve engagement with Traditional Owners outside of formal joint management committee meetings;

⁸ Gartry, L. 2019. 'Tourism Queensland chair faced perceived conflict of interest in national park tender.'
<https://www.abc.net.au/news/2019-03-03/queensland-tourism-perceived-conflict-of-interest-managed/10851100>.

- reforming the dispute mediation process;
- sustainable funding of employment programs for Traditional Owners; and
- supporting cultural management programs in joint managed parks, including annual Country Camps.

In conclusion, the Parks Draft Masterplan provides a strong direction and commitment for the future management and protection of our Territory Parks and their embedded natural, cultural and economic values. However, without a broader Territory framework of aligned natural and cultural resource management targets, the ability of the plan to deliver biodiversity conservation outcomes in perpetuity is limited. This is particularly so for the target of 'zero extinctions' – surely this is a clear target held by the whole of government for our precious native species? The Parks Masterplan should fit within a broader strategic framework for protecting and managing the Northern Territory's biodiversity and cultural values. ECNT looks forward to working with the Department constructively and collaboratively throughout the review of the TPWC Act and towards the development of a progressive biodiversity conservation strategy for the whole of the Territory.

If you have any questions in relation to ECNT's submission, please contact Kirsty Howey on kirsty.howey@ecnt.org or Shar Molloy on shar.molloy@ecnt.org.

Yours faithfully,



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