

Parks and Wildlife Commission
PO Box 496,
PALMERSTON, NT, 0831
Via email: parkplanning@nt.gov.au

31 May 2022

Dear Parks and Wildlife Commission,

Re: Submission to the draft NT Parks Masterplan 2022-52

The Keep Top End Coasts Healthy alliance (KTECH) thanks you for the opportunity to comment on the Draft NT Parks Masterplan 2022-2052.

KTECH is an alliance of environment groups that includes the Australian Marine Conservation Society, The Pew Charitable Trusts and the Environment Centre of the Northern Territory, and works with Indigenous Territorians, stakeholders, government and the community to safeguard the health of Top End coasts and to secure our treasured way of life, culture and fishing lifestyle. We have maintained a close interest in the development of the NT Parks Masterplan and in October last year made a submission to the NT Parks 2022-52 Masterplan Consultation Paper. This submission makes several key points on legislative reform. KTECH has previously provided the Commission with a detailed report by Lyn Allen Consulting on modernising NT Protected Area legislation which provides a detailed description of the structure and content of the legislation needed to underpin declaration and management of a protected area system. This submission focuses on and reflects the themes articulated in the draft NT Parks Masterplan.

Territorians care deeply about our parks and reserves

In responding to the NT Parks 2022-52 Masterplan Consultation Paper, Territorians made it very clear that they care deeply about their parks. It was also notable that people:

- Support joint management, but want it done better



- Want cultural and biodiversity values respected and protected
- Want more parks and better access to existing parks
- Strongly support nature conservation being prioritised over development
- Strongly support increasing revenue for parks but don't want their parks turned into commercial operations that undermine biodiversity, culture, recreation and lifestyle values
- Are concerned about proposals for park consolidation/rationalisation
- Recognise that zoning of marine parks is essential for the protection of marine life.

The NT Parks Masterplan presents a remarkable opportunity

One of the best tools to protect Top End nature and culture are well-managed parks and reserves. We therefore welcome the draft Parks Masterplan's recognition of the importance of our parks and reserves and believe that the final Masterplan can provide a clear plan to protect their natural and cultural values.

NT parks and reserves provide a vital haven for native wildlife and are highly valued as a place to spend time outdoors, camping and fishing, and enjoying time with family and friends. They are the backbone for the Territory's tourism industry and core to its economic success. However, they are under threat from feral animals, environmental weeds and uncontrolled wildfires, along with climate change, industrial development and pollution.

The final NT Parks Masterplan can be the turning point for the NT. However, such an ambitious plan must be matched by ambitious funding to deliver what Top End nature and culture needs, and what Territorians want for their coastal backyard. The plan must be supported by public investment as well as reform of the *Territory Parks and Wildlife Conservation Act 1976* (TPWCA).

There is also the risk that the final Masterplan could become the poor cousin of the NT Parks 10 Year Activation Plan, which focuses on infrastructure development, capital works and maintenance. Capital works and maintenance of our parks estate is important but it should not come at a cost to funding directed to management and protection of biodiversity and cultural values across NT parks. Further, this would be sharply at odds with the message from Territorians during the previous consultation process.

NT-declared parks are a critical component of protecting biodiversity and cultural values in the NT. However, they are not the full story: significant areas of the NT are conserved through other protected area mechanisms, such as Commonwealth national and marine parks and Indigenous Protected Areas. There are also opportunities for protecting biodiversity and cultural values

through agreements with private landholders; and by improving the regulatory and administrative frameworks for day-to-day management of land and waters for commercial purposes. The Parks Masterplan should fit within a broader strategic framework for protecting and managing the Northern Territory's biodiversity and cultural values.

1. Draft Masterplan vision, goals and targets

KTECH strongly supports the draft Masterplan's 30-year vision of: '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.'

Although we recognise that full implementation is necessarily a long-term endeavour, we are concerned that the thirty year time frame could delay achieving critical goals. For example, we believe it is vitally important to bring forward the timelines for the following targets which the draft Masterplan sets for 2052:

- Aboriginal people actively managing key cultural sites across the parks estate;
- 50 per cent of park rangers are Aboriginal and working on their own country; and
- NT parks and reserves account for 7 per cent of the Territory terrestrial and marine land and seascapes.

Further, there should be more ambitious targets for the number of Aboriginal rangers working on their own country; and targets set for management and leadership positions as well. We make the case for a greater proportion of NT land and waters to be protected in sections 1.3 and 1.7 below. KTECH considers the nine key themes of the draft Masterplan adequately cover the main issues for the Territory's parks and reserves and generally supports the draft goals and targets across the nine themes.

Importantly, there are several key areas that we would like to see strengthened and which must be given greater prominence in the final NT Parks Masterplan.

2. The need to modernise NT protected area legislation

The *Territory Parks and Wildlife Conservation Act 1976* (TPWCA) is outdated and needs modernising in order to protect Top End coasts and to support Aboriginal Traditional Owners to undertake sea country planning, management and protection. It is essential that such legislative changes are negotiated with Aboriginal peoples, organisations and communities.

KTECH has provided the Commission with a submission to Masterplan Consultation Paper¹ as well as a detailed report by Lyn Allen Consulting on modernising NT Protected Area legislation. We recognise that although the details of this legislative work may not be suitable for inclusion in the NT Parks Masterplan, it is important that the Masterplan does not preclude or clash with legislative advancements.

KTECH supports the need for legislative reform acknowledged in the draft Parks Masterplan (p45):

‘Undertake a review of the Territory Parks and Wildlife Commission Act 1980 and Territory Parks and Wildlife Conservation Act 1976 to provide for the classification and management of Territory parks and reserves to ensure that particular legislative settings are appropriate to the degree of protection and access best suited to a particular park or reserve.’

‘An important part of consolidating the estate is to ensure that those areas with values requiring protection have the best possible legislative protection’ at P40.

We believe that a more fundamental and broader reform of the TPWCA is warranted in order to take a system-wide approach to protecting biodiversity and cultural values, rather than relying on the park-by-park approach set out in the TPWCA. In its current form the TPWCA is insufficient to plan, manage and protect the Territory’s unique wildlife and landscapes, and the cultural values embedded in these across the full spectrum of NT terrestrial and aquatic bioregions, habitats and species. The planned reform of the TPWCA is an opportunity to take the necessary leap forward in the Territory to develop a holistic approach to biodiversity conservation.

3. Legislative reform for managing sea country

KTECH supports the draft Masterplan (p40) commitment to:

‘Continue to review and establish models of management for marine protected areas managed under Northern Territory legislation including refining zoning and incorporating models of integrated management with other sea country reserve types’.

As the Masterplan is to be a 30 year document, it is essential that this commitment is amended to read “[c]ontinue to review, establish and implement models of management...” New legislation that includes a mechanism for delivering regional conservation planning and management² is required to adequately deliver this objective. Regional conservation planning strengthens the likelihood of

¹ Available here: https://www.topendcoasts.org.au/submission_parksmasterplan

² The term “Regional Conservation Planning” has been adopted to distinguish regional planning under protected areas/biodiversity conservation legislation from other regional planning regimes e.g. Planning Act, Local Government Act. The object of the legislation which recognises Aboriginal connection to country applies to all activities undertaken using the legislation including regional conservation planning. Outcomes from regional conservation planning would therefore be expected to have natural and cultural dimensions.

landscape-scale outcomes and provides a framework for implementing a consistent set of management practices. Entering cooperative arrangements and undertaking regional conservation planning would be voluntary and could be initiated by any of the potential parties to the plan. It would not necessarily take the place of preparing management plans for individual areas. Cooperative planning processes are already in place, for example in Limmen Bight. Formally recognising the multiple arrangements could simplify management and compliance activities.

A full modernisation of the protected areas legislation will inevitably take time, but there are changes that could be made more quickly, and which could be used to achieve the commitment in the draft Masterplan.

Sea Country Management Plans are being developed without a legislative framework and Traditional Owners may also wish to strengthen the protections within their sea country Indigenous Protected Areas. There are potential pathways for achieving Aboriginal-led management of sea country using existing legislative mechanisms in the TPWCA and the NT *Fisheries Act 1988*. These legislative arrangements are not ideal. However, they could suffice until new legislative frameworks for managing sea country are available. These could provide the legal frameworks which support active management of cultural and natural values of sea country, as well as enabling Aboriginal people to better regulate access to their country.

In general there is a lack of clarity about the NT Government's ability to enact and enforce marine park management plans that exclude fishing in designated zones. A short-term remedy would be to repeal or amend s26 of the TPWCA to ensure that management plans and zoning are binding and prevail over fisheries decisions. For Limmen Bight Marine Park, it is our understanding that with the concurrence of the Minister, the Commission could amend the by-laws to remove the exemptions for licenced fishers which would then enable the intent of the plan of management and zoning to be enforced.

Another pathway to modifying fisheries management arrangements is available under the Fisheries Act which gives the responsible Minister wide scope to manage aquatic animals and their environment, using enforceable fisheries management plans and licences and permits. The Minister can readily amend plans and change the conditions of licences and permits.

4. Supporting off-reserve management and protection

The draft Masterplan (p38) includes the goal of a “private ownership model that is developed that is applicable to the Northern Territory context and has the support of Territorians”. Given that the

majority of respondents to the initial parks masterplan consultation paper rejected privatising NT parks and reserves, we assume this commitment is for establishing a system of off-reserve, private protected areas. In a thirty year time frame it is essential that this goal is to develop and implement a system for establishing, managing and monitoring private protected areas.

In the short term, the draft Masterplan could recognise the potential for promoting greater involvement of private land holders through the application of TPWCA section 73 and 74 agreements.

Section 73 of the TPWCA enables Aboriginal people who traditionally occupy and/or take and use wildlife from an area of land or sea to voluntarily enter an agreement with the Parks and Wildlife Commission for managing the land. The purpose of the agreement is to protect and conserve wildlife and/or to protect the natural features of the land. Any such agreement must be endorsed by a land council for ALRA land, or by the organisation/body that controls the land. The section is silent on zoning within the agreement area, but does not preclude the possibility provided parties agree. Section 73 agreements could be used in conjunction with modified fisheries management plans for Aboriginal people to actively manage sea country where they chose to preclude fishing access.

Establishing locally-led governance arrangements that can decide on management and other priorities will be a critical element in local Aboriginal-led management of sea country. Consideration should also be given to establishing an overarching governance and collaboration mechanism, comprised of high level Aboriginal (for example representatives of sea-country land councils) and government interests that can oversee implementation, trouble-shoot, and propose improvements. This would augment rather than take the place of consultation with local sea-country managers. Any arrangements should be able to be readily recognised and transitioned into new protected area legislation should Aboriginal people wish to strengthen available protections and management arrangements.

5. Strengthening the marine protected area estate

KTECH supports the 'Growing the Estate' theme goal: 'A strengthened and expanded Northern Territory system of parks and reserves built on a comprehensive, adequate and representative reserve system that supports recreation, health and wellbeing and tourism'. The marine protection network across tenures across the NT is far from comprehensive, adequate (nor resilient) and representative.

P39 of the draft NT Parks Masterplan notes that many of the Territory's biogeographic regions are not well represented within the protected area system, and lists them. However, the marine regions were not listed. Recognition of coastal and marine biogeographic regions that are not represented or under-represented in marine protected areas (acknowledging these protected areas come in many forms) needs to also be acknowledged and be accompanied by a commitment to the expansion of marine management and protection. A key way that this support can be delivered is by ensuring that the legislation exists to support protection across tenures, including zoning, application of section 73 off formal NT reserves, and in time, regional conservation planning frameworks.

P41 outlines the commitment: *'By 2052, NTG parks and reserves account for 7 per cent of the Territory terrestrial and marine land and seascapes'*. The 7 per cent target for spatial protection, for example, is far short of what science recommends. This target of 7 per cent is well below the level of protection that other Australian jurisdictions have on both land and sea, and the NT government needs to set a more ambitious target and one that is based on science and supported by the aspirations of Aboriginal Traditional Owners.

Furthermore, it is worth noting that the NT Government has committed to delivering two regional marine plans using marine spatial planning in this term of government. This was a priority election commitment to come out of the NT Coastal and Marine Management Strategy.

Marine protected areas can help ensure that the unique cultural, conservation and fishing lifestyle values of the Top End's coasts and seas are secured. The protection of the Territory's tourism assets, including marine parks, sea country Indigenous Protected Areas and sea country management plans can generate significant benefits for the Territory's people and the tourism economy, just as it has in such iconic and now thriving places as Ningaloo, the Kimberley and the Great Barrier Reef. In Queensland, marine protected areas cover 51% of coastal waters, in South Australia 45%, in Western Australia 41%, and in NSW 39%. We can expect tourism numbers to grow once the Top End's coasts are given greater protection, as has occurred in the Great Barrier Reef Marine Park region.

KTECH supports Aboriginal led sea country planning, management and protection. We also recognise and support that different models will be of interest to different Traditional Owners. KTECH supports the action at P40 which states *'Ensure Traditional Owner and Native Title holder support for acquisition and management of new protected areas'*.

In 2018 KTECH hosted a workshop at the Territory NRM conference for rangers and Traditional Owners working across sea country. This workshop explored different models of marine management and protection. The workshop report outlines what models were of interest to participants as well as what was required for governance, partnerships, recognition and resourcing. The report is attached as we believe it can make a valuable contribution to the formulation of the final Parks Masterplan.

The NT Parks Masterplan and the subsequent review of the TPWCA provide an important opportunity to support Traditional Owners on and off the NT parks and reserves estate, in their efforts to develop Sea Country Management Plans and to promote and support integrated management of sea country Indigenous Protected Areas, Commonwealth marine parks and other forms of protection such as dugong/turtle protection areas.

6. Natural biodiversity values theme

KTECH supports the 3 goals of the Natural Biodiversity Values theme. However, we recommend that the word 'protection' should be inserted into the third bullet point to read *'Management of biodiversity values is informed by Traditional understanding and knowledge of natural systems and applies adaptive management and protection through monitoring and strategic research'*.

The Territory's landscapes and seascapes are relatively intact and found in and outside NT parks and reserves. Contributions to the protected area network are made across a range of reserve types including Indigenous Protected Areas on land and sea, other private protected areas, Commonwealth national parks and marine protected areas, and dugong/turtle closure areas. The Parks Masterplan and modernised protected area legislation should support a NT protected area network that recognises all forms of protected area regardless of underlying tenure, include designing a comprehensive, adequate (resilient) and representative protected area network, and enable regional conservation planning and management. This would work with the regional model of governance for Traditional Owners as proposed in the draft NT Parks Masterplan, and supported by KTECH.

Page 13 mentions marine parks and what they support. While acknowledging this section provides only a high level description, it is an opportunity to better describe that marine parks also support critical habitat for threatened species and recreationally and commercially targeted species such as fish and crabs.

7. Living cultural values and heritage theme

The NT Parks Masterplan and modernised NT Protected Areas legislation should start from the premise that Northern Territory protected area policy and legislation must prioritise Aboriginal interests in land and sea country and embody a holistic approach to environmental management consistent with long established cultural management of country.

This is a critical key theme for the final Masterplan and KTECH supports its goals. We support the statement on page 21: 'better to incorporate Aboriginal ecological knowledge and practice into land and sea management' and its application in Aboriginal-led sea country planning and co-designed zoning plans, such as that underway in Limmen Bight Marine Park.

Although we agree that 'There is also scope to increase fee for service opportunities for local Aboriginal Land and Sea Ranger groups and local Aboriginal enterprises and businesses to fulfil contracts in parks and reserves', there must also be an increase in core funding (see section 2). The first goal 'Cultural values and heritage are protected and respected by Territorians/local communities and visitors' should also specifically include government and agencies in its text. Achieving active management by Traditional Owners by 2052 is an overly long timeframe that should be shortened.

8. Joint management in partnership with traditional owners theme

KTECH strongly supports the goals and targets of this theme. As the draft Masterplan notes on page 20:

'Transitioning from joint management to sole management of public protected areas, and even by-passing joint management altogether, has increasingly become a focus for discussion by various groups around the country. Renegotiating joint management arrangements may lead to some parks or reserves transitioning to sole management by Traditional Owners either as a Territory park or reserve or as an Indigenous Protected Area.'

The NLC submission to the NT Parks 2022-52 Masterplan Consultation Paper, which KTECH supports, recommends that the Masterplan commit to:

- i. extending the Parks and Wildlife Commission NT's legislative scope as it relates to joint management to incorporate Aboriginal leadership, employment and economic development;
- ii. building the governance capacity of joint management partners;
- iii. developing a process to improve engagement with Traditional Owners outside of formal joint management committee meetings;
- iv. reforming the dispute mediation process;
- v. sustainable funding of employment programs for Traditional Owners; and

vi. supporting cultural management programs in joint managed parks, including annual Country Camps.

9. Growing the estate theme

The draft Masterplan's parks expansion target of 7 per cent of Territory lands and waters by 2052 lacks ambition and should be more consistent with science and that of other jurisdictions. Funding as well as legislative reform will be required to support any growth. Examples of targets and ambitions for supporting and expanding protected areas from other jurisdictions include:

- the WA Government has its 'Plan for Parks', a plan to create five million hectares of new national and marine parks and reserves over five years. It is currently completing the Great Kimberley Marine Park.
- the Commonwealth Government has been expanding the marine parks network and recently declared the Christmas Island and Cocos (Keeling) Islands marine parks.
- the Commonwealth Government has also provided additional funding for IPAs and rangers, including funding designated specifically for Sea Country IPAs.
- in WA, cultural conservation objectives have been incorporated into the Conservation and Land Management Act alongside the biodiversity conservation objectives, the Act now allows for joint vesting, and marine parks allow for cultural use zones.
- the Queensland Government has its Protected Area Strategy 2020-2030 which provides a pathway to grow the protected area system and transform the way protected areas are managed—providing real benefits to all Queenslanders including First Nations peoples, and putting Queensland at the forefront of conservation innovation across the globe.

The size, number and diversity of the parks and reserves in the network should be seen as one of its strengths, providing varied levels of protection for significant natural, social and cultural values. Any perceived gaps should not be used to downgrade the network's significant achievements in providing management and protection of the Territory's biodiversity and culture.

10. Funding requirements for the Parks Masterplan

An increase in investment is needed if the Parks Masterplan's ambitious goals are to be met. The Masterplan should set out a government commitment to fully fund establishment, management and monitoring of terrestrial and marine parks and reserves so that they adequately protect natural and cultural values.

The NT Government should properly assess and value the contribution protected areas make to the state's economy and reinvest a commensurate amount for their ongoing management and expansion. A report commissioned by Keep Top End Coasts Healthy found that our coastal waters support over 6000 jobs and contribute \$2billion annually to the economy, showing what is at risk if we fail to adequately manage and protect Top End coasts. Not only are coastal waters central to our economic success, they underpin our unique Top End culture and lifestyle - Territorians have a special connection to our coasts which is priceless.

The NLC has also expressed concern that funding for land and sea management projects is declining which in turn compromises the outcomes that can be achieved. Funding for establishing new ranger groups is not meeting demand leading to 'gaps in the landscape'. Inadequate levels of funding for remote ranger program infrastructure (such as coordinator housing, ranger compounds and offices) and operational funding also challenges program sustainability³.

11. Implementation, evaluation and review

There is no reference to review and evaluation of the Masterplan. For a 30-year Masterplan, regular review, evaluation and, if necessary, adjustment, will be critical to its success. A monitoring, evaluation, reporting and improvement framework for the masterplan as well as the parks system is essential.

Governance arrangements for engaging with Traditional Owners should embed the right of 'free, prior and informed consent'. In addition to the regional governance arrangements for joint management foreshadowed in the draft masterplan, there should be higher level mechanisms established (in consultation with the Land Councils) – at the Commission/Territory-wide level that enable Aboriginal Territorians to determine how their lands will be managed, and to establish accountability and reporting mechanisms to ensure that objectives are met.

³ NLC submission to Samuel Review 2020 https://epbcactreview.environment.gov.au/sites/default/files/2020-05/ANON-QJCP-UGJD-R-%20Northern%20Land%20Council_0.pdf

Recommendations

1. The draft NT Parks Masterplan is an ambitious plan and must be matched by ambitious funding. The Masterplan should set out a government commitment to fully fund establishment, management and monitoring of terrestrial and marine parks and reserves so that they adequately protect natural and cultural values. The NT Government should properly assess and value the contribution protected areas make to the state's economy and reinvest a commensurate amount for their ongoing management and expansion.
2. There must be an increase in core funding and operational funding for Aboriginal Land and Sea Ranger groups and ensure that it is replaced with the Parks Masterplan's intentions to *'increase fee for service opportunities for local Aboriginal Land and Sea Ranger groups and local Aboriginal enterprises and businesses to fulfil contracts in parks and reserves'*.
3. Capital works and maintenance of our parks estate is important but it should not come at a cost to funding directed to management and protection of biodiversity and cultural values across NT parks. Further, this would be sharply at odds with the message from Territorians during the consultation process.
4. The Parks Masterplan should fit within a broader strategic framework for protecting and managing the Northern Territory's biodiversity and cultural values.
5. The draft Masterplan (p38) includes the goal of a 'private ownership model that is developed that is applicable to the Northern Territory context and has the support of Territorians'. In a thirty year time frame it is essential that this goal is to develop and implement a system for establishing, managing and monitoring private protected areas.
6. In the short term, the draft Masterplan could recognise the potential for promoting greater involvement of private land holders through the application of TPWCA section 73 and 74 agreements.
7. We believe it is vitally important to bring forward the timelines for the following targets which the draft Masterplan sets for 2052:
 - Aboriginal people actively managing key cultural sites across the parks estate;
 - 50 per cent of park rangers are Aboriginal and working on their own country; and
 - NT parks and reserves account for 7 per cent of the Territory terrestrial and marine land and seascapes.
8. There should be more ambitious targets for the number of Aboriginal rangers working on their own country; and targets set for management and leadership positions as well.
9. The 7 per cent target for spatial protection is far short of what science recommends. It is also well below the level of protection that other Australian jurisdictions have on both land

and sea. The NT government needs to set a more ambitious target and one that is based on science and supported by the aspirations of Aboriginal Traditional Owners.

10. Recognition that the *Territory Parks and Wildlife Conservation Act 1976* (TPWCA) is outdated and needs modernising, especially if we are to establish the protection our Top End coasts need and support Aboriginal Traditional Owners to undertake sea country planning, management and protection.
11. The NT Parks Masterplan must not preclude or clash with these legislative advancements to come.
12. The Parks Masterplan and modernised protected area legislation should support a NT protected area network that recognises all forms of protected area regardless of underlying tenure.
13. The draft NT Parks Masterplan (p40) commits to: '*Continue to review and establish models of management for marine protected areas managed under Northern Territory legislation including refining zoning and incorporating models of integrated management with other sea country reserve types*'. As the Masterplan is to be a 30 year document, it is essential that this commitment is amended to read "[c]ontinue to review, establish and implement models of management...'
14. The attached document titled 'TNRM Sea Country Workshop Summary: 13 Nov 2018' should be considered in the development of the NT Parks Masterplan.
15. Recognition of coastal and marine biogeographic regions that are not represented or under-represented in marine protected areas (acknowledging these protected areas come in many forms) needs to also be acknowledged (P39).
16. Page 13 mentions marine parks and what they support. While acknowledging this section provides only a high level description, it should explain that marine parks also support critical habitat for threatened species and recreationally and commercially targeted species such as fish and crabs.
17. Under the Natural Biodiversity Values theme we recommend that the word 'protection' should be inserted into the third bullet point to read '*Management of biodiversity values is informed by Traditional understanding and knowledge of natural systems and applies adaptive management and protection through monitoring and strategic research*'.
18. Under the Living cultural values and heritage theme, '*Cultural values and heritage are protected and respected by Territorians/local communities and visitors*' – we believe this should also include government and agencies within its text.

19. KTECH supports 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;
- 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.

20. In addition to the regional governance arrangements for joint management foreshadowed in the draft masterplan, there should be higher level mechanisms established (in consultation with the Land Councils) – at the Commission/Territory-wide level that enable Aboriginal Territorians to determine how their lands will be managed, and to establish accountability and reporting mechanisms to ensure that objectives are met.

21. Develop a monitoring, evaluation, reporting and improvement framework.

Thank you for the opportunity to comment. Should you seek clarification on comments made throughout this submission, please contact Adele Pedder on email adelepedder@topendcoasts.org.au or phone 0422 108 539.

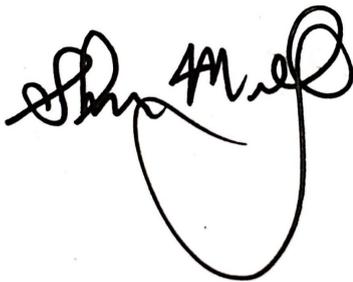
Yours sincerely,



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