**Submission on NT Parks Masterplan 2022-2052 Consultation Document**

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**15 October, 2021.**

Thank you for the opportunity to comment on the Parks Masterplan document.

I am a resident of Alice Springs, I was born and raised in the Northern Territory. I have always loved the arid zone landscapes and in particular have loved visiting the NT parks. I am also acutely aware of and saddened by the environmental decline (weeds and species loss) that I have witnessed in my lifetime.

As a public health nurse I am acutely aware of the health benefits of NT Parks and the importance of keeping country strong for the Traditional Owners and maintaining connections to Country.

I also acknowledge the tireless work of the parks operational staff. They, over many decades, have shown commitment and passion to conserve our wonderful parks.

## Overarching comments

This masterplan proposed until 2052 is a once in a generation exercise and one that is overdue. I believe the masterplan must be expansive in its vision and scope. It needs to consider the threats to the environment; the ecosystems and landscapes we must protect and the massive opportunities for a sustainable economy and delivering social justice. This should be in the context of the entire Northern Territory environment, landholdings and economy, not just the Parks estate as it stands and DEPWS's current budget as a successful plan has benefits far beyond parks' boundaries.

I strongly support the stated intent to produce a high level vision and strategy document. The Masterplan states: *"We are asking the big questions about the future of parks and reserves and how we should manage them going forward. We will draft a Masterplan after we hear your views about the bigger picture. There will be an opportunity to comment again on the draft Masterplan later in 2022."*

Unfortunately this document fails to capture views about the big questions. Nor does it suggest that it will give rise to a vision which reflects the opportunities in and urgency of landscape scale conservation in the NT.

In my view it is a frustrating and poor document because:

1. It does not get a conversation going about the vision for the Parks estate in 2052. Instead it seems focused on the logistics of managing something like the current estate.
2. It gives a general commentary on the preferred issues for discussion without providing information or any analysis of substance (e.g.: What is the state of biodiversity? What are the threats? What are the actual opportunities and the costs? How are joint management agreements going? What have been the barriers?)

3. It is focused at the wrong level and is not at all strategic - it asks very specific questions about what are sometimes nuts and bolts issues of managing the current park under current funding limits.
4. It seems quite leading and to be jumping to preferred solutions e.g. public private partnerships and "rationalising" parks to reduce the management burden rather than presenting information which could help people decide on where value and opportunity really is to be found and how much investment is warranted.

The failure to provide any supporting analysis gives the consultation document a rather rushed feel. It doesn't inspire confidence that the eventual Masterplan will be strongly evidence based.

I'm also concerned that ***not providing solid information in this round of consultation and then jumping to a draft Masterplan at the next consultation phase will exclude the public from having input into the fundamentals of the Masterplan at any stage in a meaningful way.***

I'm also concerned that the consultation document and the prohibitively long questionnaire is highly inappropriate for engagement with a large section of the community. This may include some Aboriginal people whose country is affected by the Masterplan and who will have the strongest stake in how land is conserved and parks are managed. I trust other more appropriate approaches are also being used during this process.

I believe the process needs to be redesigned with another round of consultation included, using more sophisticated means of engagement, and with real information presented for discussion **before** the draft masterplan can start to be drafted.

Preparation of the information needed for an evidence based discussion will require time but will deliver a better outcome than the process proposed, which appears too focused on minor adjustments to business as usual.

***I recommend the processes needs to be redesigned and expanded, with timeline extended accordingly.***

## Comments on a revamped process - next steps

At a minimum the master planning process requires:

1. Development of a high level **vision** for the entire conservation estate (all tenures) in 2052 and defining the ***values*** to underpin the extent and approach to parks.

2. Following this discussion papers on the key themes to enable information rich discussion. Possible topics for these discussion papers on
   - A survey of information available on areas have biodiversity values that should be conserved and which are under-represented in the conservation estate
   - An economic analysis of what and where are the opportunities to develop large scale parks, how much income this could generate
   - A survey of land outside current parks have comparatively low value alternative uses which would be easy candidates for inclusion

- A biodiversity corridor plan which looked at joining up conservation areas for ecosystem resilience
- Monitoring reports on how the parks estate is going
- Review of opportunities for how to redress inappropriate annexation of sacred Aboriginal land in the past and how reparation of this may also deliver conservation outcomes..

***Public involvement in vision and values setting and access to information rich discussion papers is needed before the draft Masterplan can be prepared.***

**Masterplanning Governance**

If it isn't already occurring strongly I suggest:

(1) this process needs to be carried out with close input and guidance by community and aboriginal advisory groups (with minutes publicly available); and
(2) sponsored by other parts of government (e.g. portfolio responsibilities for Aboriginal Affairs, Chief Minister, Tourism and Trade) and other levels of government which have stake in Parks.

This is needed because:

(1) The opportunity is not business as usual. It needs an all of NT Government commitment and warrants major investment.

(2) If done well it will restore natural capital; generate income and respond to challenges and opportunities which are not of Parks making nor is Parks the beneficiary.

(3) Parks bares the management burden associated with parks but is frequently not the agency with legislative responsibility for the outcomes arising from great parks management. Nor does it have control over decisions causing the management threats (e.g. buffel on neighbouring pastoral land and upstream erosion causing siltation of waterholes). This will avoid the current failing where the document appears to have one eye on reducing management costs rather than fully focused on addressing biodiversity threats and the economic opportunity.

(4) The eventual plan will need across government commitment, investment and support; including a potential bilateral agreement with other organisations and the Australian government.

## Comments on Vision and Values

My **vision** for parks is:

That Parks and other protected areas **effectively conserve all threatened species and all landscape types**; at a **scale** that is sufficient to preserves ecosystem and landscape integrity in a time of climate change; and which makes NT parks and conservation **iconic and globally recognised**; for their natural and cultural heritage. And that the benefits and income

are first and foremost to the Traditional Owners and helps redress in**equality** and unjust past decisions.

My **values** for the park are:

(1) **Conservation first** – ensuring the estate is representative and conserves all landscape areas and species must be Parks core value
**(2) The areas selected for reservation in the conservation estate are evidence based, protect all ecosystems and landscape types in recognition of existential threats such as climate change** To address the alarming biodiversity losses across the territory (decline in natural capital) caused by climate change and other threats like feral animals and weeds (buffel).
(3) **Management activities and funding are sufficient to address threatening processes within and outside the estate** – for example sections of the Larapinta trail, chain of ponds walk at John Hayes rockhole are losing their conservation value and the visitor experience is being diminished due to buffel grass invasion.
**(4) Equity and undoing** Land reserved in parks (and other land vestings as appropriate) acknowledges and redresses misguided establishment of pastoral leases over Aboriginal land (premised on the misguided doctrine of terra nullius) and restore opportunities to for Aboriginal people whether in the existing estate, new land with appropriate joint management arrangements or new Indigenous Protected Areas. In doing so provide more equitable and appropriate access to country and support livelihoods of local people, rather than stations which in large part internalise profits and externalise costs and create monocultures which are antithetical to biodiversity.
**(5) There are iconic conservation parks and nature based experiences at scale distributed across the Territory. These should** build on the opportunity recognised in the TERC to use the NT's comparative advantage in its biodiversity and expansive natural and cultural landscapes build global recognition around this tourism opportunity. In particular I want iconic scale conservation parks in the arid zone (Finke catchment and MacDonnell Ranges) and the Barkly/ Gulf- Savannah (Davenport Ranges – Karlu Karlu) with World Heritage or UNESCO biosphere recognition to ensure recognition and ongoing commitment.)
**(6) Appropriate mix of recreation opportunities is appropriate but these must not compromise the conservation values**
(7) **Activate other sustainable income streams** such as carbon storage, traditional foods and cultural activities.
(8) **Management of Parks estate is linked to conservation in other land tenure areas including IPAs.**

## Comments on how the Masterplan could achieve these Vision and Values

I expand on how I would like to see these values achieved in the following table.

**Table: Values for parks and suggestions for how these could be achieved.**

| | Value | Discussion |
|---|---|---|
| 1) | **Conservation** – ensuring the Parks estate is representative of all landscape areas and species, enables the NTG to meet its statutory conservation commitments | Parks should comprehensively conserve all landscapes and species with conservation as its core value.<br><br>Core conservation areas must remain in public ownership. This can be complemented by other conservation approaches.<br><br>The Masterplan must be evidence based: i.e.<br>1. Present an analysis of ecosystem types and landscape classes and identify those which are those underrepresented in the conservation estate (e.g Sandover Hwy area) and those threatened species whose ranges occur outside of the conservation estate.<br><br>2. Consider the wealth of information available on ecological values across the Territory. For example NESP presents this analysis of ecological values: https://www.nespnorthern.edu.au/wp-content/uploads/2016/02/NAWFA-Ecological-Assets-Project-Final-Report-updated.pdf<br><br>3. Consider NTG conservation commitments such as in threatened species management plans.<br><br>4. Consider complementary benefits. For example retiring pastoral leases.<br><br>The information should be available for public consideration **BEFORE** the public is presented with the masterplan. |

| | Value | Discussion |
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| 2) | **The areas reserved in the conservation estate are sufficient to protect all ecosystems and landscapes from existential threats such as climate change, ferals and weeds** | The western central arid zones have been identified as already collapsing: https://theconversation.com/existential-threat-to-our-survival-see-the-19-australian-ecosystems-already-collapsing-154077<br><br>The conservation estate should be suitable and of sufficient scale is needed to address unprecedented threats to biodiversity from climate change, feral animals and weeds (overwhelmingly buffel in the arid zone). This should include choosing areas and establishing linkages to allow species to move across and beyond their current range and choose areas which are resilient to these<br><br>The Masterplan should analyse how it can give effect to relevant guidance documents on how to mitigate for climate change resilience https://nccarf.edu.au/climate-change-adaptation-guidelines-arid-zone-aquatic-ecosystems-and-freshwater/ https://www.nespnorthern.edu.au/wp-content/uploads/2016/02/TRaCK_5.11_NthAustAquaticEcologicalAssets_Summary.pdf<br><br>Reconfiguring and emphasising north-south corridors can be play a major role in climate change resilience<br><br>In the arid zone water is scarce and getting scarcer – preserve the water sites especially those that are resilient to climate change (e.g. Running Waters and other waterholes sustained by regional scale shallow groundwater and manage the land to protect waterways and waterholes (i.e. remove livestock and ferals from waterways, return keystone apex predators and more generally to stop buffel monocultures and couch grass near waterways).<br><br>Next round of consultation the evidence needs to be presented in a useful way about e.g. what are the threatened ecosystems and how can they be protected. |

| | Value | Discussion |
|---|---|---|
| 3) | **Strategies and funding are sufficient to address threatening processes within and outside the estate** – for example sections of the Larapinta trail, chain of ponds walk at John Hayes rockhole are losing their conservation value and the visitor experience is being diminished due to buffel grass invasion | For example sections of the Larapinta trail, chain of ponds walk at John Hayes rockhole are losing their conservation value and the visitor experience is being diminished.<br><br>I'm also concerned that threats to endangered and vulnerable species are not being adequately managed e.g. red cabbage palms at Boggy Hole are threatened by buffel, waterholes sustaining the Finke Gobi are under threat from impacts to streamflows from buffel and cattle in the catchment and much of the Macdonnell Ranges is under threat from buffel, in part due to encroachment from adjoining pastoral lands.<br><br>Again this should consider and present all available evidence e.g.<br>NESP work on threatening processes<br><br>https://www.nespnorthern.edu.au/wp-content/uploads/2020/11/Prioritising-threatened-species-in-northern-Australia-wrap-up-factsheet.pdf<br><br>https://www.nespnorthern.edu.au/wp-content/uploads/2019/10/Evaulation-of-remote-sensing-for-mapping-monitoring-gamba.pdf<br><br>In controlling feral animals I would like Parks to use the best practice in animal welfare and for this to be informed by policy endorsed by animal welfare organisations. I'm opposed to use of 1080 poison and I believe this can be avoided. |
| 4) | **Equity and undoing** Land reserved in parks should provide more equitable and appropriate access to country and support livelihoods of local people.<br><br>Consideration of new land in the parks estate should include consideration of opportunities to redress misguided establishment of pastoral leases over | I see the opportunity for conservation to occur at land system and catchment scale under a range of tenures to provide greater resilience to these threatening processes and deliver complementary social justice benefits.<br><br>Park planning should consider opportunities to address dysfunctional and anachronistic pastoral leases estate retire land where the externalised costs to excluded native title holders and potential tourists and degradation of ecosystems and biodiversity outweigh the largely small and privatised benefits of running cattle over fragile landscapes. |

| | Value | Discussion |
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| | Aboriginal land (premised on the misguided doctrine of terra nullius).<br><br>I note that stations create monocultures which are antithetical to healthy country and sacred sites have been damaged through water points. | Similarly recognise the cost and ethical failure of further industrialising the landscape through unconventional gas expansion where opposed by the Traditional Owners must be opposed.<br><br>Within the park effective joint management programs are needed. It is the responsibility of the NTG to make these work.<br><br>I would also like to highlight specifically how inappropriate it is the Karlu Karlu is divided by Stuart Highway and this must be addressed.<br><br>**Barriers to private investors purchasing pastoral leases and using these must be immediately removed.** |
| 5) | **There are iconic conservation parks and nature based experience at scale across the territory.** which respond sto (and raise) the opportunity recognised in the TERC to use the NT's comparative advantage in its biodiversity and expansive natural and cultural landscapes build global recognition around this tourism opportunity. In particular I want iconic scale conservation parks in the arid zone (Finke catchment and Macdonnell Ranges) and the Barkly/ Gulf- Savannah (Davenport Ranges – Karlu Karlu) with World heritage or UNESCO biosphere recognition to ensure recognition and ongoing commitment) | An NT comparative advantage is clearly tourism in its environment and culture. I support the Territory Economic Reform Commission (TERC) recognition of this (refer page 20 https://ntrebound.nt.gov.au/__data/assets/pdf_file/0020/952301/terc-final-report.pdf) and believe the Masterplan could further the TERC's recommendations.<br><br>To make the most this needs to be done at scale. I emphasise the values which are unique pertain to biodiversity, Aboriginal culture and these values should be core. This expectation of the TERC (refer section 3 beginning page 83) is that Aboriginal people will be included in opportunities. I believe the Masterplan provides a great opportunity for this.<br><br>I suggest the opportunity exists for iconic scale conservation areas , similar to Kakadu in the Barkly and the arid zone.<br><br>These could protect strategic environmental assets, be highly marketable and encourage tourists to Australia spending more of their time in the territory. |

| | Value | Discussion |
|---|---|---|
| | | Key focuses for iconic scale conservation:<br>1. MacDonnell Ranges- capturing the east and West MacDonnells extending, the Larapinta Trail and including Alice springs sites like Ilparpa claypans<br>2. Finke River catchment the opportunity to secure the entire catchment in conservation estate or IPAs<br>3. Linking Davenport Ranges NP- Karlu Karlu<br>4. Roper through – Limmen NP to Macarthur River area (or perhaps better as IPA?)<br><br>I would also suggest pursuing international recognition through World Heritage Listing or creation of UNESCO Biosphere reserves. The Finke River (Larapinta) catchment as the oldest river, with strong ongoing traditional Aboriginal culture, threatened species and majestic terrain clearly would meet these. Similarly MacDonnell Ranges; Karlu-Karlu joined up with Davenport NP and Limmen NP at face value meet qualification criteria. This could ensure bipartisan commitment and lock-in commitment from the Australian government.<br><br>Greater equity – conservation and nature based activities at face value seem to offer more opportunity to local Aboriginal people, firstly in keeping country healthy, but providing employment through joint management and opportunities that might arise through tourism. |
| 6) | **Appropriate mix of recreation opportunities is appropriate but these must not compromise the conservation values** | Self-explanatory |
| 7) | **Activate other sustainable income streams** such as carbon storage, traditional foods and cultural activities. | Self-explanatory |

| | Value | Discussion |
|---|---|---|
| 8) | **Management of Parks estate links to conservation in other land tenure areas including IPAs.** | I see the opportunity for conservation to occur at land system and catchment scale under a range of tenures to provide greater resilience to these threatening processes.<br><br>The approach to these threats should be coordinated across all land tenures including pastoral lands – it is pointless to invest in parks if adjoining lands are a constant source of fire, ferals, weeds and sediments. Where the threats posed by pastoral lands are significant land use change should be pursued. |