



Reply to: NPA, PO Box 337, Newtown NSW 2042

Joint Response of NSW Environment Groups to the Taskforce on Tourism and National Parks Report (November 2008)

Introduction

The Taskforce on Tourism and National Parks (TTNP) was an opportunity for NSW to take a major step forward in integrating national park protection and nature tourism planning. The latter has received inadequate attention in the past, especially compared to several other states. While containing some useful recommendations, the TTNP report has major shortcomings. It fails to adequately address the terms of reference and is narrowly focussed on legislative, regulatory and structural constraints to development in parks.

Most importantly, the report's recommendations:

- do not consider that the State Plan targets can be achieved under the existing regulatory framework;
- fail to acknowledge that National Parks contribute most to regional communities when commercial tourism infrastructure is kept outside park boundaries;
- pursue an inappropriate and unsubstantiated emphasis on privately-funded infrastructure inside parks;
- fail to address how the environment and facilities of National Parks will cope with the projected increase in visitor levels.

1. The TTNP recommendations will not deliver State Plan targets

Development of National Park land can only ever play a minor role in State Plan target P6 (*increased business investment in rural and regional NSW*) and target P1 (*increase tourist visitation to NSW by 10 million visitor nights by 2016*).

Target E8 (*increase visits to State Government parks and reserves by 20 per cent by 2016*) will easily be achieved on current trends (TourismNSW 2008 analysis presented to TTNP).

The report places unsubstantiated faith in a vague business model based on private investment in new on-park facilities and 'public private partnerships' to

deliver unquantified 'benefits'. International data shows that this model can only provide 5 to 6 per cent of a park's revenue stream, which is more than counterbalanced by adverse impacts, including reduced tourism revenues to communities surrounding the park. The report includes no specific proposals for new 'experiences', nor is a process advanced for identifying and developing these. The implications of the carbon economy, global financial instability, rising transport costs and declining international tourism are also not addressed.

The alternative:

- Make the current legislative, regulatory and administrative framework work better to ensure National Parks are kept as natural as possible (widely identified as the prime visitor attractant).
- Achieve State Plan tourism and development targets outside National Parks, not by creating a regulatory framework to pursue them on conservation lands.
- Invest in maintaining, improving and promoting existing good quality, low-impact park facilities, experiences and basic services. Greatly improve and expand information and promotion. These provide the basis for enjoyable park visitation and nature based tourism, and always will.
- Undertake an experience audit of the park system. Identify opportunities for improved presentation of existing experiences. Consider any need for additional basic facilities such as walking tracks, picnic areas and lookouts within a statewide context and identify the most appropriate locations.
- Analyse existing visitation patterns in spatial, demographic and trend terms. Compare against park condition audits and focus promotion on those parks that are accessible to markets and able to cope environmentally.
- Implement DECC's Living Parks strategy.

2. The TTNP emphasis on privately-funded infrastructure inside parks is misguided

Of the report's 11 'findings' and 20 recommendations, five findings and 11 recommendations are about increased development and easier commercial access to national parks. Only one quite vague recommendation relates to benefits to parks (a stated key objective).

The TTNP does not properly consider the costs and benefits of the private investment model and fails to make the case for adopting it, plus it relies on several false assumptions. There is no supporting evidence or financial analysis of the alleged revenue benefits. Conversely, the potential pitfalls and costs of private developments on public conservation lands are not considered, even though the management and environmental costs in many cases will eliminate any purported cash benefits.

The report fails to present a case on why tourism developments must be in parks rather than nearby or in adjacent towns. Much of the cash flow from isolated developments typically flows right past the region. The emphasis on park development is misguided because it will benefit only a small part of the tourism industry.

None of the case studies presented demonstrate a significant net revenue contribution to a host Australian park. Meanwhile, the flipside of the cost to park management is ignored. The potential contribution of facilities for 'high yield' international visitors to growing park visitation remains unquantified in the report, because it is inconsequential.

The great bulk of park visitors will always come from 'low yield' and local visitor markets, their travels supported by off-park tourism services - the bulk of the industry which is largely ignored by this report.

No strong case is made for NPW Act amendment. The existing NPW Act allows for any visitor-related developments that may be required, including accommodation. The existing safeguards and constraints are appropriate for what is supposed to be the most protected category of land in NSW, with an acknowledged primary function of conservation. Due process, including plan of management review, ensures that the community can be 'brought along' with worthwhile initiatives, rather than causing confrontation by imposing development on public parks.

The report does not consider the long term risks of weakening the NPW Act or of allowing commercial activities in wilderness, which are considerable.

The alternative:

- Maintain the NPW Act as it stands, so that National Parks continue to be for nature first, protected from unpredictable commercial pressures and the damaging impacts of development.
- Public investment in National Parks provides a massive economic return and this is the only strategy that can deliver significant increases in both visitation and park revenue (from the individual park visitors, not commercial operators).
- Focus on the core park function of maintaining natural resources and providing basic visitor facilities, while accommodation and other high impact services are provided in adjacent lands and towns, where they can be provided at less cost and have the greatest local benefit.
- Focus on how the latent potential of the \$1 billion worth of existing park visitor facilities can be better packaged, presented and promoted.

3. The report fails to address how park environments and facilities will cope with more visitors

Finding 3 states:

Sustainable nature tourism can only be successful for reserves established under the NPW Act if the conservation values are maintained or enhanced by the activities undertaken.

This reflects the TTNP Terms of Reference and declared government imperatives, but it is not addressed by any of the 20 recommendations. The *Managing for Sustainability* section of the report is less than a page in length, with no recommendations. The report fails to address how conservation values are to be protected (let alone enhanced) under a regime of increased commercial tourism and development. Public-private partnerships will exploit the massive public investment in visitor infrastructure to benefit a small sector of the tourism industry.

The report is fundamentally unbalanced and fails to support the rhetoric of conservation as the priority national park objective. The report recommendations, as a package, will add to the pressures on parks without ensuring adequate coping mechanisms are in place, resulting in a progressive deterioration of the park system over time.

The alternative:

- Re-assert the primacy of conservation in parks, in practice as well as rhetoric.
- Develop a comprehensive visitor management strategy for NSW parks that focuses on producing *and managing* a targeted increase in visitation through local Visitor Management Plans.
- Maintain the constraints, processes, checks and balances associated with on-park development to ensure that park values are permanently protected. This includes the existing NPW Act, Accommodation Policy and Plan of Management processes.

Conclusion

The parks, the community, the tourism industry and the government are ill-served by the TTNP report. It has many serious and obvious flaws and represents a serious long-term threat to the parks. There is a better way. The government's objectives can be achieved without changing the NPW Act, changing the accommodation and facilities policies, or placing more pressure on park values to make way for development. The government should pursue the alternative strategies outlined above.