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20 April 2011

Dear Mr Hayden

**Re: People and Parks: A Draft Visitor Strategy for South Australia's National Parks and Reserves**

The Conservation Council of South Australia (Conservation SA) welcomes the opportunity to comment on People and Parks: A Draft Visitor Strategy for South Australia's National Parks and Reserves, and we thank the Department for the granting of an extension to the deadline to enable this.

Conservation SA believes that People and Parks should be a serious strategic attempt to balance conservation outcomes with park visitors. The assets protected in South Australia's National Parks and Reserves are irreplaceable and a comprehensive visitor strategy would address how conservation outcomes can be improved and the overall visitor impact reduced.

However currently in People and Parks conservation outcomes - the primary purpose of National Parks and Reserves - are placed at risk. That visitor increases will have positive benefits for Parks is assumed, but concrete evidence of how and why is not provided. Strategies to address existing or likely future illegal and sanctioned visitor activities that have negative environmental impacts are not properly addressed.

The document references sustainability in principle, but offers no practical measures. There is no landscape scale planning. Conservation SA is concerned that the draft strategy may open Parks up for excessive and potentially inappropriate development, rather than balancing the needs of biological assets with those of park users.

Conservation SA supports many of the concerns expressed in submissions by Friends of Parks Inc and some of its individual member groups. We believe People and Parks in its current form to be a potentially dangerous strategy,

which is risking our irreplaceable environmental and biodiversity assets for a financial return.

There is a lack of clarity as to how the Vision, Goals and Strategies of People and Parks contribute to the legislated aims of National Parks and Reserves. This leaves the document open to suggestions that it is too focused on increasing the appeal of Parks as tourist destinations, at the expense of implementing the aims of National Parks. These two outcomes may not be inconsistent, but it is incumbent upon the department to make this case, with the legislated aims of National Parks as the starting point. The draft Visitor Strategy consistently fails to make this case, and is therefore flawed from the outset.

Finding the right level of protection and standards is vital. More people are visiting Parks, especially those close to Adelaide which are most diverse biologically, and so mitigating their impact on conservation assets is vital.

Yours sincerely,

A handwritten signature in black ink that reads "Tim Kelly". The signature is written in a cursive style with a prominent initial "T" and a long, sweeping underline.

Tim Kelly  
Chief Executive



# Conservation Council SA

## **Conservation SA Response to People and Parks: A Draft Visitor Strategy for South Australia's National Parks and Reserves**

**20 April 2011**

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The **Conservation Council of South Australia Inc (Conservation SA)** is the peak conservation body for South Australia, representing over 50 of the State's environment and conservation organisations.

Conservation SA is an independent non-profit, non party-political, community based organisation which provides resources, advice and representation for the SA environment movement, and which leads many of the key conservation campaigns in SA.

Conservation SA is known for its success in developing long term community development, education, and on-ground environmental restoration programs.

Conservation SA regularly liaises with Local, State and Federal Governments, Government agencies, media, educational institutions, NGOs, unions, industry, business and other groups on matters relating to the environment and social justice.

As a community organisation, much of what Conservation SA achieves is through a large network of skilled volunteers from all walks of life – for its office, on-ground, governance and campaign activities.

Conservation SA is committed to a healthy environment for South Australia.

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## **The purpose and vision of People and Parks**

The purpose and reasoning behind the draft People and Parks document - especially the journey from the legislative purpose of National Parks and Reserves to the stated Vision, Goals and Strategies - have not been articulated in the document. This significant omission has created problems in responding to the draft document.

The document should demonstrate a high degree of integration with the purpose of National Parks and Reserves. It difficult to provide comment that doesn't regularly refer back to this fundamental omission in the document.

The lack of clarity in this area leaves People and Parks open to the suggestions that it is not complementary to the legislated aims of National Parks and Reserves, and is more concerned with a simple increase in human use of Parks. These two outcomes may not be inconsistent, but it is incumbent upon the authors to make this case.

## **Guiding principles**

Conservation SA believes that the guiding principles of any visitor strategy should:

- Be integrated with biodiversity conservation targets;
- Be based on landscape scale planning;
- Ensure recreation planning is integrated with conservation planning for Parks, and conservation objectives described and considered in visitor planning documents;
- Include evidence-based, rigorous environmental risk assessments for trail developments;
- Limit the expansion of activities that have negative environmental impacts and plan mitigating activities;
- Have dedicated resources for monitoring visitor impacts;
- Adequately deal with known impacts such as vehicles (road kills and off-road harm) and the spread of pests, which are likely increase as more visitors are encouraged
- Have dedicated resources for enforcing compliance of recreational users of Parks;
- Ensure that the cumulative impacts of expanding trails and recreation uses are considered rather than purely on a park by park basis; and
- Identify high priority Parks and reserves to be protected from visitor impacts.

## **The value of Parks**

Most National Parks and Reserves are places of high conservation value. They are havens of biodiversity and the core tenant of South Australia's efforts to protect its ecological and biodiversity assets. National Parks and Reserves are in part an expression of the intrinsic value of biodiversity that is separate from its value to humans.

On page 1 the document lists five Guiding Principles to ensure "use of parks does not compromise biodiversity". Conservation SA suggests that this strategy acknowledges

that 'South Australia's ecosystems and biodiversity have an intrinsic value which is the focus of protection within Parks', and that this should be acknowledged in the first principle.

The Guiding Principle of this strategy that "everyone should have the opportunity to enjoy ... parks", should then include the qualification that activities should not have negative impacts on biodiversity.

The Guiding Principle that "decisions about the way parks are used should be based on evidence and risk assessment", should explain the purpose being to protect biodiversity and ecosystems.

The document should be amended throughout to clarify that visitor activity must fit around and be complementary to the purpose of protecting biodiversity in Parks.

**We suggest the Guiding Principles of the document should be amended to say:**

1. Everyone involved in recreation and tourism should help to protect the intrinsic, natural and cultural values of Parks.
2. Everyone should have the opportunity to enjoy and learn about Parks insofar as this does not adversely affect park biodiversity and ecosystems.
3. South Australians have a responsibility to contribute to the long-term protection of Parks.
4. Parks are an integral part of the landscape and play an important role in supporting healthy, vibrant and prosperous communities.
5. Decisions about the way Parks are used should be based on evidence and risk assessment to protect park biodiversity and ecosystems.

People and Parks is focussed almost exclusively on how value can be obtained from Parks. It provides no reassurance that it will be complementary and integrated with the broader management of Parks, which includes solving the ecological issues that have arisen partly because of the human impacts in the past.

Most Parks were created specifically to protect them from further extractions in order to preserve their environmental assets, and Conservation SA believes People and Parks should be amended to reflect this.

## **Biodiversity conservation**

The unique opportunity that People and Parks has to achieve positive biodiversity outcomes is almost completely ignored in the document. The strategy could be improved by prioritising and/or linking to other strategies that prioritise:

- **Landscape scale planning;**
- **Identification of important and/or sensitive assets;**
- **Evaluation of how public uses may impact on these assets; and**
- **Integration with other planning processes, such as the AMLR Regional Trail Strategy.**

Target 2: "Evaluate and report on trends in the 'environmental footprint' for key visitor activities in parks by 2015" is essential however a mechanism is required to ensure that corrective actions are taken if there is evidence that acceptable limits are exceeded and Parks become 'loved to death'. The Strategy should also

describe how acceptable limits and targets for improvement or recovery of some areas will be determined.

Conservation SA recommends that targets specifically relating to improving biodiversity outcomes should be included. **At a minimum, we suggest that Target 2 should be amended to include:**

- **A recognition that all visitor activity must be within conservation requirements;**
- **A process for determining acceptable conservation requirement limits; and**
- **A method of determining impacts and recovery targets and taking action where Parks are at risk.**

While sustainability is mentioned as important in principle, there is no plan for how sustainability is integrated into the Goals and Strategies in practice. This is a significant and serious omission which must be addressed.

**Environmental Risk Assessments need to apply not just to built and physical infrastructure, but also for increasing usage rates and new uses. Acton 2.4 should be amended to reflect this.**

## **Landscape scale and integrated planning**

The document falls short of integrating visitor planning with conservation objectives by failing to address landscape scale needs. Landscape scale planning is integral to the protection of biodiversity assets and must be prioritised in People and Parks if it is to be an effective tool for increasing the resilience of our ecological assets.

The document should be amended so that it actively works to develop and implement a framework for visitor management that includes a landscape scale approach so that visitor planning and conservation objectives are integrated.

The purpose of the document should be to balance environmental needs, risk assessments and adaptive management frameworks with fair and transparent policies for access by the public, groups and clubs and it should be amended to reflect this.

## **The impacts of climate change on biodiversity resilience**

The latest evidence shows that climate change is happening dramatically faster than even the best estimates only a few years ago could have predicted. Further, a warming of 2°C “now represents a threshold, not between acceptable and dangerous climate change, but between dangerous and ‘extremely dangerous’ climate change” (Anderson and Bows; p. 21).

Despite this, emissions continue to rise at unprecedented levels.

National Parks and Reserves, already highly vulnerable to outside pressures, will face enormous challenges to biodiversity protection in the coming years as a result of climate change. Threats include more intense heatwaves, bushfires, floods, sea level rises and will be accompanied by new temperature, water, weed and reproduction regimes. The impact that climate change poses to biodiversity in our National Parks

and Reserves, and the increase in pressure on them in the coming years, cannot be overstated.

The document does not adequately address the impact of climate change, how climate change will increase pressure on our biodiversity assets that are already struggling, or the increased importance that healthy and resilient Parks will play in a different climatic future.

For example, climate change is mentioned only twice in passing in the document (page 5 & 6), and this seriously under-represents the reality of the threat that Parks will face into the future as a result of climate change. A particular deficit for a Visitor's Strategy is its omission that simply maintaining the status quo will require a reduction in all other negative impacts and these will likely include negative impacts by visitors.

The draft Strategy should describe how it is integrated with a broader landscape scale effort that would show where resilience to climate change is being addressed, and how the strategy can support these efforts.

**People and Parks should be amended to provide a better representation of the impact of climate change and to create strategies and targets that see overall visitor impacts on Parks decrease in the next 10 years.**

## **Private operators and ecotourism**

The document disappointingly comes across as a push to open up Parks to development, which may compromise conservation outcomes and erode the biodiversity and ecosystem values that underpin park visitation and tourism. This undermines the seriousness of the issues the document addresses. Many of the ecosystems and biological assets in the places this strategy covers are irreplaceable. If these assets and visitor policies are to be managed successfully together it requires well-considered, integrated and strategic policy. Unfortunately the document does not provide any assurance that this has been achieved.

There are a myriad of potential conflicts with opening National Parks and Reserves to private operators and ecotourism enterprises that have not been adequately addressed.

While there are benefits to leveraging investment from the private sector, this is a double-edged sword. When commercial interests and personal livelihoods are at stake, all too often these are prioritised over the rights of the ecosystems whose intrinsic value and very tangible contributions to our economy are largely ignored.

Our laws for protecting private investor needs are well established and well used. The laws for protecting ecosystem requirements are nowhere near as successful. It needs to be clear in the strategy to anyone wanting to invest in Parks that the ecosystem requirements of the Parks will supersede their needs and that they should invest at their own risk. Legislation in this regard needs to be drafted.

Despite instances where private operators and ecotourism outfits operating in areas of high conservation value have been shown to be more concerned with the appearance of conservation, than actual conservation (Peace, 2005; 431-32), the document fails to present strategies to prevent this. Instead private operators are

seen as an integral part of providing the “needs” of public access without addressing the likely impact on biodiversity.

There is also the possibility that the values of private operators will be in conflict with the values of National Parks and Reserves. An example of potential conflicts between private operators and National Parks can be seen in a recent example of a tourist who visited Wilpena Pound in early 2011 and was astounded when he asked someone behind the desk at the Wilpena Pound Visitor Centre about the spiders that were prolific in the vicinity and was told: “Don't talk to me about spiders, they're creepy!” The document makes no provision for this possibility, or any actions to mitigate this.

Parks have a responsibility to the communities that surround them. Will tourism in national parks take business away from towns? Would overnight stays in towns create better economic returns? Eco-tourism is big business - are these businesses going to be locally owned and the benefits returned to the community, or are they going to be big interstate and international companies?

While page 8 of the document talks about best practice nature-based tourism, it is important to recognise that these are internationally competitive businesses, and therefore if they are to operate in National Parks there must be very clear strategies to make sure the conservation and environmental needs of National Parks and Reserves will come first. The document does not provide reassurance that this will be achieved. While the paper states that some nature-based tourism business “demonstrate best practice in the sustainable use of sensitive environments” it is also fair to say that many do not (Peace, 2005; 431-32).

## **Economic contributions of Parks**

The primary objective of National Parks and Reserves is to protect their environmental assets and People and Parks should be a document that leverages this to improve economic and community benefits. Despite this, the document provides no references in relation to community expectations for National Parks and Reserves to be revenue generating exercises.

Does the community expect National Parks and Reserves to make money, or are they valued for their intrinsic value and biodiversity outcomes? There is no discussion about the economic contribution National Parks and Reserves already make, for example through the contribution of ecosystem services or the increased property values they offer to nearby landowners. This work needs to be done before Target 5: “By 2020, increase the contribution of parks to the South Australian economy by 20%” can start.

Developing multi-day walking trails in National Parks could have a significant environmental impact. A better way would be to investigate how to balance conservation with the goal of boosting local economic development.

For example, Action 1.5: ‘Investigate the feasibility of developing outstanding, multi-day walking trails on Kangaroo Island and in the Flinders Ranges’ could be amended to develop multi-day walking trails which incorporate overnight stays in towns rather than National Parks. This would have a positive impact on local

economies, utilise existing infrastructure, and mitigate potential negative environmental outcomes in National Parks.

## **Assumptions about positive impacts of increased visitors**

People and Parks should be a wonderful opportunity to assess visitor impacts and desires and balance these with biodiversity needs and priorities. Instead, the document facilitates increased visitor activity without sufficiently addressing biodiversity conservation.

People and Parks is based on an assumption that increased visitors will lead to positive outcomes for Parks, but no evidence is provided to support this. The assumption is not only unsubstantiated but contrary to common sense. Human activity in Parks has a range of obvious negative impacts, so any benefits of increasing this activity would have to be substantial to achieve a net gain.

Is the assumption that increased visitor revenue will benefit Parks? This may not be the case. Either way, the question must be asked, will revenue raised be more than what it costs to address the negative biodiversity outcomes caused by the increased visitation?

Another basis for the assumption may be the expectation that exposure to nature in Parks will foster more positive attitudes to environmental protection. However this also is not necessarily the case. A 2008 study by Peterson et al demonstrated that the type of activity a person undertakes in a park has an impact on their attitudes towards it. While appreciative activities such as hiking and camping were found to foster positive environmental attitudes, non-appreciative activities such as fishing, hunting and riding all terrain vehicles actually fostered *negative* environmental attitudes.

Target 1: "Increase the number of visits to 8 million each year by 2020" has not been justified within the document. A successful case for how increasing visitor numbers will achieve the biodiversity aims for National Parks and Reserves has not been made. **Conservation SA argues that before any target can be set, we need to see a robust methodology to determine what level of visitation increase will be viable given specified biodiversity limits.** We anticipate that it would be a lower number than the 8 million, but the science should be the arbiter for this decision.

Action 2.6: "Establish three trial sites for visitor impact monitoring to demonstrate sustainable, adaptive management and cooperation" (People and Parks, page 17) is worded to presuppose that monitoring will show these positive outcomes. Strategies to take action if monitoring finds that increased visitors has negative conservation outcomes must be described. Furthermore the wording should commit that the monitoring trials will be the first part of a monitoring commitment for the life of the strategy.

**Action 2.6 should be amended to measure the impact of increased visitors, the number of sites should be expanded (eg, to include monitoring at all areas containing state or federally listed flora and fauna), and it should include steps and measures to be undertaken if increased visitors are found to have a negative impact.**

## Omitting and minimising negative visitor impacts

While not all visitor activity in Parks has adverse conservation outcomes, this document essentially ignores that there could be conflicts at all. Part of the purpose of a document such as this should be to identify likely conflicts, suggest mitigating strategies and pre-empt likely impacts/solutions. Ignoring that visitors may have negative conservation impacts is at complete odds with what we know about the impacts of human activity on biodiversity and ecosystem resilience.

This omission undermines the strategy's commitment to protecting conservation assets. People and Parks makes no mention of how to mitigate current and likely future negative visitor impacts. For example the document:

- assumes that all activity has similar impacts;
- does not address how to stop existing unsustainable uses, for example negative impacts on threatened orchids in Belair National Park as a result of illegal mountain bike riding;
- does not look at how to address illicit trail riding and bicycle riding in National Parks and Reserves;
- does not include a strategy to minimise road-kill within and adjacent to Parks from increasing numbers of visitors;
- does not include a strategy to engage recreational users involved with high-impact activities, both on-ground and at the club/peak body level;
- does not include targeted engagement of recreational users involved in illegal disturbance activities, such as creating unauthorised trails or using trails for unauthorised purposes; and
- does not include strategies to limit known direct impacts such as the introduction and spread of weeds and diseases, littering, making new tracks, vandalism of infrastructure and native plants and animals, or disturbance of wildlife during feeding and breeding times.

**It is vital that People and Parks be amended to:**

- **address negative visitor impacts on conservation outcomes, both sanctioned and illegal;**
- **predict likely future negative impacts on conservation outcomes, both sanctioned and illegal, and especially accounting for likely increased pressures on biodiversity due to climate change; and**
- **provide strategies to reduce negative impacts on conservation outcomes.**

## Engaging with the conservation sector

Community engagement is already strong in Parks and it is important not to decimate current community support and volunteers just to then put resources into creating community support and volunteers for Parks. Good community engagement rests on the principle that communities have a right to contribute to decisions that impact on them (IAP2 Core Values:

[http://www.iap2.org.au/resources/list/asset\\_id/3/cid/1/parent/0/t/resources/title/IAP2%20Core%20Values](http://www.iap2.org.au/resources/list/asset_id/3/cid/1/parent/0/t/resources/title/IAP2%20Core%20Values))

Despite Goal 2 being the shared stewardship of Parks, Conservation SA is concerned that the strategy may cause significant concern and disappointment to many people in the conservation sector.

Conservationists are keenly aware that “green” is saleable. “Greenwashing” is a recognised term and people who work in environmental protection are highly tuned to this kind of rhetoric, as it often goes hand in hand with the destructive environmental practices that they work to stop.

While Conservation SA is not suggesting that the strategy seeks to allow negative conservation outcomes this is nevertheless a real possibility. The draft strategy does unfortunately contain phrasing that is consistent with some of the descriptions of greenwashing in the Greenwashing Index Criteria (2011). For example, the lack of detail on environmental protection makes it open to being seen to convey that “there is a green practice when there isn’t” and to “make a green claim that is vague or seemingly unprovable”. It therefore needs to be tightened to improve clarity, demonstrate protection for biodiversity and ecosystems, and include strong checks and mechanisms for corrective action.

For example this document:

- Includes no active steps to facilitate environmental protection;
- Assumes that increased visitor numbers is better for Parks, but doesn’t provide any evidence to back up this case or describe how this could be achieved.

While it does not:

- address environmental impacts of visitors now, let alone the environmental impacts of increased numbers of visitors
- address the likelihood of negative environmental impacts due to an increase in visitors, such as the spread of weeds and diseases, littering, making new tracks, vandalism, or the disturbance of wildlife during feeding and breeding times
- properly address the impacts of infrastructure such as car parks, toilets, or campgrounds
- provide an adequate picture of the increasing pressure that is being placed on environmental assets due to climate change, urban expansion, or water extraction and their likely impact on biodiversity conservation into the future within existing visitor numbers, let alone increased visitor numbers

How to mitigate the impact of visitors on conservation outcomes in a milieu where these pressures are increasing should be central to a Visitor Strategy with strong conservation values.

For example, the Strategy’s Vision talks about “unique opportunities” for “sustainable recreation and tourism” (People and Parks, page 12), but the Strategy provides no substance behind how “sustainable” will be measured or achieved and it requires no positive environmental outcomes in order to be successful.

The Strategy must not allow the economic benefits that might be extracted from National Parks and Reserves to take precedence over protection of their environmental assets. The current emphasis of the strategy is a huge concern for the conservation sector.

Ambiguity, lack of clear guidance and wishful thinking in the finalised version of this strategy could be a real hindrance to conservation outcomes, rather than an asset.

## References

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