

**Re: BBS & Nandewar Reserve Tenure –  
Community Conservation Zones**

While the intention of the area that is to be protected by the Government is clear, we have some reservations about the mechanism the Government will use to protect these areas.

**No New National Parks – New Tenures Created**

Instead of national parks, state conservation areas and state forests, there will be community conservation zones. The zones will be:

**Zone 1** – Conservation & recreation (NP equivalent)

**Zone 2** – Conservation & Aboriginal Culture. (This tenure precludes Aboriginal ownership).

**Zone 3** – Conservation & Mineral Exploration.

**Zone 4** – Forestry Operations & Mineral Exploration.

**Duplication, new bureaucracy and a multiple-use approach to park management**

- Committees overseeing the management of conservation areas should be focused on conservation outcomes not resource extraction.
- There are existing voluntary park management committees in existence in the areas. Their membership has developed skills and a corporate knowledge of the structure. They would be capable of advising on the management of the conservation areas.
- New community committees could be established for the forestry areas if this is important to the government.

The proposal to introduce a separate and different way of managing these new lands appears to be a retrograde to the old Conservation Trust approach. This approach led to such regrettable incidents as logging in Royal National Park in order to raise sufficient funds for management once the initial government interest and enthusiasm had waned.

The new structure acts against best practice management and consistent management across the State, there appears to be no link to the NPW Advisory Council, nor the statutory Audit & Compliance Committee established under the NPW Act

**Concerns with Proposed Community Conservation Area Tenure System**

**1. Need for Improved Management Delivery not bureaucratic duplication**

The proposal to introduce a separate and different way of managing these new lands appears to be a retrograde to the old Conservation Trust approach. This approach led to such regrettable incidents as logging in Royal National Park in order to raise sufficient funds for management once the initial government interest and enthusiasm had waned.

The creation of new advisory committees would create some duplication with existing Regional Advisory Committees. The best example of this is the Coonabarabran area. The Northern Plains Regional Advisory Committee advises on the management of Warrumbungle National Park and Pilliga Nature Reserve, while adjacent to this will be new conservation reserves under the CCA tenure system.

It has taken many years to build up the levels of experience present in the Regional Advisory Committees. The corporate knowledge contained in these bodies is invaluable to the management of the Parks. The creation of geographically adjacent committees with very similar objectives is not only unnecessary duplication; it is also a snub to the community members who have invested significant time into the existing committees. Providing their membership encompasses the relevant geographical areas and the necessary expertise, the existing advisory committees could quite easily be used to manage the new conservation reserves as well.

**3. Zones 1, 2 not solely managed by NPWS and Minister for the Environment**

The Government's *Fact Sheet 5* states that the CCA advisory committees will 'advise on management objectives for all zones'. Any advisory committee should only advise on plans of management. Management objectives should be fixed by legislation (as the

National Parks and Wildlife Act does in establishing reserve management principles – Sections 30E – 30K).

**Aboriginal Owned National Parks**

There is no ability to achieve Aboriginal Ownership under the CCA system. The creation of Indigenous Land Use Agreements (ILUAs) is not an alternative to Aboriginal owned national parks. The WCAs submissions to the process called for & the Terry Hie Hie group, Bebo and Goonoo to be aboriginal owned and co-managed national parks. There were opportunities through the indigenous land fund to acquire land along the Castlereagh River to establish a conservation link from Goonoo to the River and provide employment and tourism opportunities off-park for Aboriginal people in the region.