



Blue Mountains Conservation Society Inc

ABN 38 686 119 087

PO Box 29 Wentworth Falls NSW 2782

Phone: (02) 4757 1872

E-Mail: bmcs@bluemountains.org.au Web Site: www.bluemountains.org.au

Nature Conservation Saves for Tomorrow

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Senior Team Leader, Reserve Establishment
National Parks and Wildlife Service
PO Box 1967
Hurstville BC NSW 1481

By email: OEH.ReserveEstablishment@environment.nsw.gov.au

Review of National Park Establishment

1. Preamble

The Blue Mountains Conservation Society (BMCS and also 'The Society' in the present submission) has a membership which fluctuates in the range 800-850. The membership is mainly drawn from the City of the Blue Mountains and the Greater Sydney region, but a scattering of members exists throughout NSW and also interstate.

The Society has a strong interest in the Greater Blue Mountains World Heritage Area (GBMWhA) in terms of protecting its many parks and reserves. It is also extremely active in campaigning for the reservation of the Gardens of Stone Stage 2 Proposal over the western portion of the Blue Mountains and the Western Escarpment between Blackheath and the Capertee valley, and pursuing the National Heritage Listing of parts of these areas with a view to having them ultimately being assessed for addition to the GBMWhA.

BMCS notes that, in the context of the *Parliamentary Inquiry into Management of Public Land Management in NSW*, OEH is seeking responses in the areas of:

- updating the NSW National Parks Establishment Plan – that is preparing a revised **Directions Statement**;
- examining the social and economic implications of new park proposals – that is effecting a **Socio-economic Assessment**; and,
- improving community involvement in the reserve establishment process – that is facilitating **Community Involvement**.

The Society's response will be carried out under the three principal headings of Directions Statement, Socio-economic Assessment and Community Involvement.

The Society emphasises that the purpose of all national parks is to conserve nature and cultural heritage whilst providing for visitor-use in ways which **do not damage** conservation values. It follows that the consultation process, as currently being implemented, **should not and must not** result in sectional interests (e.g., horse riding, high-impact recreational activities, invasive tourism infrastructure) being prioritised over the primary conservation values of parks and their encompassed wilderness.

The Society notes that the consultation period closes on April 12.

2. Directions statement

2.1 Introduction [DS S1 p1]

The objects of the *NPW Act* are ‘motherhood’ statements; few would disagree with them, but turning such statements into plans of action and measurable outcomes determines their worth.

The following comments are pertinent:

- Reference is made to nature-based recreation but there is no definition of what this comprises. The Society would like to think that the term implies low-impact recreation, but without a glossary, who knows?
- The element of self-congratulation in claiming that reserves now cover more than 8.8% of the State should be tempered by recognizing that NSW is only second from last in the ‘reservation stakes’.
- Within the next 5 years, the target should be to double the current percentage; the focus should be on maximizing conservation outcomes through establishing an inter-connected network of corridors.

2.2 Enhancing the value of the National Park Estate (NPE) [DS S2 p2]

It is stated that nearly half of all terrestrial ecosystems in NSW remain poorly reserved, and many are not protected in reserves at all. This leads to the statement that the acquisition of suitable lands to expand and enhance the NPE is a long-term proposition. In turn, this results in five ‘long term principles for reserve establishment’.

The Society notes that:

- The principles are equally applicable to the shorter term; they are in fact **over-riding principles**, as is apparent by the duplication of these principles in DS S3, supposedly dealing with ‘**near-term**’ expansion and enhancement.
- A potential conflict exists between items 3 and 4 [DS S2 p2]: clearly in item 4 “*Reserves should be designed and managed to support their primary purpose*”; but BMCS opposes the notion in item 3 that “*Reserves should be established to provide increased opportunities for public access...*” **unless it is concurrently acknowledged that this is not the primary purpose.**
- The document lists **long-term thematic conservation priorities** including, but not limited to, improvements in: connectivity, managerial efficiency, covering poorly represented ecosystems and habitats, protecting important water-supply catchments, and reserving place of significant geodiversity (e.g., Ben Bullen State Forest). **BMCS is disappointed that aiming for substantial areas of managed wilderness is not mentioned. Wilderness is fundamental to protecting habitat and biodiversity.**

2.3 Purpose of the directions statement [DS S3 pp3-4]

To convey the types of conservation priorities which are important to the expansion and enhancement of the NPE in the near-term. It presents the Government’s focus for effort and investment over the 2015-2020 period. The thematic conservation priorities are now reduced to: connectivity, additions enhancing management efficiency, and selection of culturally important landscapes and places (**this must surely cover The Ben Bullen Pagoda Land System!**)

The Society then notes that the document [DS S3.1 p3] introduces substantial ‘flexibility’ by:

- indicating that a potential acquisition which also has longer-term priorities could be of heightened interest; and,
- emphasizing funding limitations, land availability at any given time, and ‘balancing’ conservation, social and economic considerations.

This largely enables the decision-makers to do as they wish within exceedingly elastic limits!

The principles of the CAR system are invoked for establishing the merits of a given area, and mention is made of commitments to the National Reserve System. All of this has merit, but when BMCS has attempted to interact with OEH in relation to reserving an area, it is hard to penetrate the gobbledegook.

2.4 Thematic conservation priorities (TCP) [DS S4 pp5-8]

Having emphasised that the purpose of the directions statement is to focus on three main things (but with vast amounts of ‘flexibility’ – see Section 2.3 above) within the near-term of 2015-2020, Section DS S4 wades through the seven long-term thematic conservation priorities listed in DS S2.1.

The Society finds this juxtaposition of long-term and near-term priorities within a document entitled “*Directions Statement for National Park Establishment 2015-2020*” most confusing. This has been alluded to in Section 2.2 above. The communication-failure stems from the document’s poor construction. The lay-out of the document should have been presented as part of the Introduction. **There should have been a clear statement to the effect that the over-riding long-term principles for enhancement and expansion of the NPE will be presented and aspects of their application provided. A subset of these data will then be presented in the final section as the near-term actions for 2015-2020.**

2.4.1 TCP and the Gardens of Stone Stage 2 Proposal

BMCS will not go through the details of DS S4.1 to S4.7. It has general agreement with what is stated, but will highlight aspects of particular significance to BMCS’ interests:

- DS S4.3 p6 specifically emphasizes that cultural heritage priorities include:
 - areas of identified wilderness, as is the case with the 2400 ha of land within the Gardens of Stone Stage 2 Proposal on the east side of Newnes Plateau¹;
 - lands which protect wild rivers – the 2400 ha of land within the Gardens of Stone Stage 2 Proposal includes Clarence Colliery’s effluent which feeds into the Wollangambe River and the World Heritage Area; and,
 - scenic landscapes as in the Blue Mountains, including the western escarpment which is part of the Gardens of Stone Stage 2 Proposal.
- DS S4.4 p6 refers to poorly reserved environments such as box eucalypt woodlands and grasslands of the western slopes and western parts of the Sydney Basin bioregion – such environments, particularly on Permian soils, characterize parts of the Ben Bullen Pagoda Land System which lies within the Gardens of Stone Stage 2 Proposal.
- DS S4.6 p7 refers to lands in important water-supply catchments such as Sydney’s – the Gardens of Stone Stage 2 Proposal aims to protect tributaries feeding the Upper Coxs River which is one of the systems supplying Lake Burragorang.
- DS S4.7 pp7-8 is concerned with places having significant geodiversity. In elaboration, the document states: “*The priority placed on acquiring lands with geodiversity significance will be informed by a mix of values including: representativeness; rarity; importance for research or understanding landform history or geological processes; and their cultural and social importance (including educational, biological, aesthetic, scenic, historical, sense of place, spiritual and recreational.*” **The Society has quoted this because the Gardens of Stone Stage 2 Proposal encompasses all of these values.**

Specific geodiversity attributes mentioned are:

- aeolian landforms – Newnes Plateau contains examples of late Pleistocene sand dunes – these should be preserved as an indication of climatic conditions at that time, and would be reserved by creation of the Gardens of Stone State Conservation Area (part of the Gardens of Stone Stage 2 Proposal); and,
- under represented soil types – the Ben Bullen Pagoda Land System includes the Tablelands Grassy Woodland Complex Unit which includes woodland vegetation developed on Permian-derived soils – due to agriculture and general clearing the vegetation types and soils are poorly represented in the reserve system. **This could be rectified by reserving the Ben Bullen State Forest as part of the Gardens of Stone State Conservation Area.**

¹Gardens of Stone Stage 2 Proposal, Assessment Report by DEC, August 2006.

The Gardens of Stone Stage 2 Proposal satisfactorily meets the TCP criteria and advocates appropriate forms of reservation. The essence of the proposal goes back to 1932. It then became part of the proposal which resulted in creation of the Gardens of Stone National Park in 1994 and Wollemi National Park additions in 1995, it was most recently ‘re-launched in 2005, and the Airly-Genowlan portion became the Mugii Murumban State Conservation Area in 2011.

In 2006, DEC² recognised the merits of reserving the parts of the Gardens of Stone Stage 2 Proposal covered by the Ben Bullen and Wolgan State Forests. These have been discussed extensively over the past nine years. The merits of the areas in terms of unique landscapes, biodiversity and outstanding cultural values have been recognised by the Department of Planning (in its various manifestations), the Planning Assessment Commission, and OEH. **Yet, despite thousands of people expressing support for reservation of these areas, the process seemingly stagnates.**

The 2006 DEC assessment also recognised that certain areas (2400 ha) on the eastern side of Newnes Plateau are part of the NPWS-identified Wollemi wilderness. They abut and should be added to the existing National Parks once Clarence Colliery’s operational needs are resolved; **yet the matter still stagnates.**

Over the past few years, the Gardens of Stone Stage 2 Proposal has received sustained and extensive public support, its merits have been recognised by the Planning Assessment Commission and accepted by the Department of Planning, and the environmental and cultural importance of the region (particularly the Ben Bullen and Wolgan State Forests) has been acknowledged by OEH. **If all of this is unable to secure appropriate forms of reservation, then there is surely a major deficiency in the reservation process.**

2.4.2 Additional reservation criteria

Although many criteria are alluded to in DS S4, the Society wishes to emphasise several aspects which may be receiving insufficient consideration.

- ***Ecological integrity***

There is obvious merit in reserving areas in which the integrity of natural landscapes and their supported ecologies is ‘relatively pristine’³. **The selection process should therefore have wilderness criteria as a prominent component.** Apart from the integrity implied by ‘wilderness’, it is blatantly obvious that the costs of maintaining and improving ‘wilderness’ are far less than those needed for ecologically damaged regions.

The Society consequently notes that reserving the 2400 ha of NPWS-identified wilderness on the eastern side of Newnes Plateau should be a matter of utmost priority. Conversely, the current approach would seem to be procrastination whilst progressive surface degradation by mining activities and high-impact recreation takes place; this is madness!

- ***Public recognition and asset value***

Some regions have spectacular scenery, are reasonably close to major population centres and lend themselves to low-impact recreation, educational purposes, and suitable tourism. If reserved and well managed, such regions have long-term economic value, as well as environmental value. They are indeed a State asset.

Newnes Plateau, part of the Gardens of Stone Stage 2 Proposal, has the capacity to support substantial amounts of appropriate tourism, recreation and education; and to be a source of revenue!⁴ Such an asset is begging for a protective form of reservation (State Conservation Area), whereas it is inadequately protected by Forests Corporation and is being increasingly degraded by illegal trail bike, 4wd activities and hooliganism. **The question becomes whether it is better to step in and**

² Gardens of Stone Stage 2 Proposal, Assessment Report by DEC, August 2006.

³ This is used because tens of thousands of years of pre-European settlement and more than two hundred years of European settlement have left their marks on the region: some impacts are seen as ‘heritage’ and valued, whereas others (particularly over the past 100 years) are deleterious.

⁴ http://www.bluemountains.org.au/documents/campaigns/seeing_the_gardens.pdf

prevent further damage in the interest of long-term benefits, or allow unique ecosystems to be trashed?

BMCS believes that the above criteria should be part of the selection process, and believes that ‘Public recognition and asset value’ should have increasing importance in regions proximal to substantial population centres.

2.5 NPE Planning regions [DS S5 p9]

The process of building the National Park Estate commonly involves three stages: establishing a node or nucleus to which additions can be made; once the nucleus exists, increasing viability by significant addition of lands; and, fine-tuning reserves to gain managerial efficiencies. The Society accepts these but there must be a clear appreciation that the stages are an overlapping progression rather discrete entities.

The broad application of the three stages in relation to the five reserve system planning regions (DS S5 p9 Map 1) is acknowledged. BMCS is principally concerned with the Coast and Coastal Ranges (CCR) division but is cognizant of the westward gradation into the Slopes and Tablelands (ST) division.

In relation to CCR, BMCS considers that reservation of the Gardens of Stone Stage 2 Proposal is fully consistent with the primary and secondary foci: namely, fine tuning existing reserves, and strengthening existing reserves and establishing new nodes respectively.

2.6 CCR [DS S6 pp10-11]

The Society is disappointed that the Gardens of Stone Stage 2 Proposal is not directly mentioned under: connectivity (S6.1.1); reserves with very poor external boundary configuration, lands adjoining reserves which support poorly reserved ecological communities and species, lands within identified wilderness areas, and appropriate high conservation value Crown lands adjacent to reserves (all in (S6.1.2); and landscapes and places of special significance to Aboriginal people (S6.1.3).

The Gardens of Stone Stage 2 Proposal is perhaps being alluded to in S6.1.4 relating to longer-term outcomes: *“seeking to establish some new reserves which incorporate poorly protected forests, woodlands, shrublands and wetlands of the western parts of the Sydney Basin Bioregion”*.

The Society believes that the lack of direct reference to the Gardens of Stone Stage 2 Proposal is in conflict with past utterances by OEH and the then Minister Parker. It seemingly demonstrates a lack of commitment to an exceedingly well documented proposal, and thereby highlights the limitations of the approaches embodied in the Directions Statement.

3. Socio-economic assessment [SA]

The pertinent document⁵ emphasises that NPWS understands the importance of socio-economic considerations as part of a wider assessment process aimed at reaching well considered and balanced land acquisition decisions. This may be so, but the critical matters are how these socio-economic considerations are evaluated, and how the products of the evaluation are set against the environmental, cultural, and desirability aspects. The process is conveyed in SA Fig.1 p2. It is interesting that the relative importance of reservation versus socio-economic rejection in Fig.1 are placed on equivalent footings. Apparently the current socio-economic values are more important than environmental and cultural values, particularly when these are set against aboriginal culture.

Much of this document seems to be concerned with the acquisition of private land as opposed to the change of use of crown lands. The two are clearly different and should be subject to a different process. For example, the Gardens of Stone Stage 2 Proposal largely comprises State Forests and various forms of Crown Lands⁶; acquisition costs in the sense of purchasing privately held lands do not apply. However, before looking further at these aspects, the nature of ‘socio-economic consideration’ merits comment.

Three levels of consideration are considered (SA pp4-7):

⁵ <http://www.environment.nsw.gov.au/resources/protectedareas/140854SEANPSWLandAcqu.pdf>

⁶ Fig. 2, Gardens of Stone Stage 2 Proposal, Assessment Report by DEC, August 2006.

- Level 1 aims to produce a local socio-economic profile to help OEH understand the local community and local economy with respect to the acquisition's location.
- Level 2 produces a local economic assessment based on an **economic model** which predicts the likely response of the local economy to the acquisition proposal.
- Level 3 involves a land-use change assessment based on a cash-flow forecasting process.

Level 1 tends to be limited to inholdings and minor boundary changes, whereas all three levels are used for more substantial reserve-expansions and new reserve-proposals. All three levels involve a degree of quantification (level 1 is extremely superficial), but BMCS notes the substantial differences of opinion about valuing different types of environmental asset versus more tangible assets such as the production of coal or hardwood. Just because models and cost-benefit analyses yield numbers, the value of the numbers can only be as good as the quality of the inputs and nature of the assumptions made.

The Society makes the general observation that the SA process is presented as involving rigorous evaluation. Yet what is presented in SA pp4-7 pays little attention to the intangible benefits of saving an ecosystem! The Society is concerned with a set of processes which seemingly know the price of everything but the value of nothing!

3.1 Acquisition of private lands

- The existing system involves a purchase price being determined by 'government' in accordance with a set of guidelines. Social-economic aspects are part of this process, but no matter how desirable the 'package of land', negotiations are restricted to the price-range as determined.
- The acquisition involves a willing buyer and a willing seller; there is no such thing as forced acquisition in this context.
- It follows from such a sales contract, that neither the buyer nor the seller has obligations to the 'local' community or its council - it seems ludicrous to be concerned about the economic input of the seller in terms of rates, employment and overall welfare – have we reached the stage where a property owner can't act in his/her perceived best interests by selling it to the NPE?
- A further consideration is that private lands **worthy of acquisition** will tend to be relatively undisturbed (not cleared and weed-infested) and as such, will have contributed little to employment and social welfare – **it is a simple truism that the more desirable the property, the less likely will be its economic loss to the local community.**

3.2 Acquisition of other lands

- Leases for mining purposes and areas with a high potential to yield exploitable metallic and non-metallic resources tend to be excluded from reservation through the intervention of the Minister for Resources in the State's economic interests.
- Exceptions to this are where the mining is underground, the surface impacts are essential to the underground operations and hopefully minimized, and reservation is as a State Conservation Area (SCA) – the corollary is that open-cut mining and open-pit sand extraction are incompatible with SCA reservation.
- It is appreciated that some regions of historical mining (e.g., for coal or oil shale) will have created significant infrastructure and areas of local disturbance which, although detracting from the natural environment, constitute cultural heritage and effectively enhance the need for reservation.
- State Forests' leaseholds and various other types of Crown Lands fall within the purview of the Department of Primary Industries (DPI) and the responsible Minister. A transfer of Crown Land from the DPI to (say) OEH is covered by existing legislation. Transfers from Forests Corporation are similarly regulated.
- Transfers of large areas of Crown Lands into the NPE require consideration of social and economic issues which may result in various forms of compensation being negotiated. Examples of this relate to the logging industry in the Brigalow region.

- Such packages involving compensation and progressive adjustment should be absolute once signed off by all parties. This may not prevent later attempts to modify the agreement, but it should be clearly understood that such attempts to modify conditions will be given short shrift.

4. Community Involvement [CI]

This comprises two main aspects; first, the opportunities for public input throughout the NPE process; and second, dealing with the types of request which detract from the principal conservation objectives of the NPE.

4.1 Public input

This is spelt out in CI⁷. The Society recognises the existence of the many opportunities provided for the public to have its say. However, certain matters merit comment:

- **General – advisory committees**
These are a useful way of bringing views to the attention of NPWS and the NPE process, the extent of their effectiveness is necessarily a function of their compositions. An advisory committee is selected to represent a diversity of opinions; this means that NPWS can find support for and therefore continue to proceed with its preferred position. In addition, the lag times between BMCS (say) contacting a member of the advisory committee, the matter being considered at a meeting, and seeing whether or not a detectably positive outcome eventuates are inefficient. Ultimately, the committee is advisory, so while advice can be taken on board should the committee have a common position, acceptance is not mandatory and may in fact be summarily disregarded.

Because of the above, BMCS feels that there needs to be a more rigorous process whereby formally presented views are listed and can be tracked through to the decision-maker(s). Ideally, this should emulate Planning’s website where all documents related to an assessment are recorded.

- **General – contacting the NPWS RET**
This is only by email in relation to reserve establishment matters. Obviously the Society wants to know what has happened about the PoM for the Mugii Murum-ban SCA⁸. On at least one other matter, the Society had difficulty in obtaining a definitive answer, so please note the content of footnote 8.
- **Specific – input during the reserve establishment process**
‘Protected area planning’, the first of the five stages refers to the current opportunity to comment on the Directions Statement for NPE – this option closes on April 12 – BMCS is availing itself of this opportunity; it also refers to the open option to provide suggestions about new reserve proposals and make offers of land for acquisition – the Society has done this in the context of the Gardens of Stone Stage 2 Proposal and the offer of land.

‘Assessment of land suitability’, the second stage, is said largely to be a **confidential process** involving other government departments over such things as future forestry, mining, and infrastructure needs, as well as existing use and land title issues; there is little room for community involvement. **The Society strongly believes that this should not be confidential!** If, for example, coal or hardwood is considered more important than environmental and heritage outcomes, such that the land is deemed unsuitable for acquisition, the community should be told the basis for the value-judgement and be given the opportunity to comment and seek more information.

For far too long, the Society has been assured that reservation of Ben Bullen State Forest had high priority but was awaiting determination of the Coalpac Consolidation Proposal (CCP). When the CCP was rejected by the Planning Assessment Commission’s Review and then by Planning (principally on environmental grounds) before being withdrawn, action by OEHL then became contingent upon the Coalpac Modifications Proposal (CMP). The latter was approved by Planning but again rejected by the Planning Assessment Commission. Coalpac is now under liquidation and is no longer a player. Surely it is time for OEHL to fully recognise the incredible values of the region and not wait for the next attack

⁷ https://engage.environment.nsw.gov.au/establishing-national-parks?tool=survey_tool&tool_id=upload3#tool_tab

⁸ The PoM would seem to be on hold, so please treat this as a formal question to NPWS RET.

on a unique landscape? Or is it a case of waiting for another distortion of the mining assessment system in favour of the coal mining industry at a time when parts of the industry are dying?

The Society believes confidentiality should have no part to play in OEH's determination of an acquisition's worth. Behind the scenes coercion of one department by another, or one Minister by another, in the interests of short-term economic and/or political considerations is rejected.

- ***'Priority acquisition options selected'***

This third stage involves internal consideration by NPWS and takes place behind closed doors; it provides no opportunity for community input. **If secrecy is in any way justified, what is the provision for informing advisory committees of what has made the cut and why, and for those advisory committees to convey the information to their constituencies? Additionally, where a proposal has been made by a non-government organization, there should most certainly be full feedback.**

- ***Acquisition of land, and Reservation of land***

Neither of these stages have much provision for community feedback beyond having views about the reservation category and name. By this time, the region has effectively been reserved such that the need for community involvement is marginal. BMCS has no concerns about this.

4.2 Detractions from conservation priorities

The simple facts are that the NPE provides a diversity of low-impact recreational activities in catering for more than 2500 km of walking tracks, extensive river sections for canyoning, 800 picnic sites, nearly 700 lookouts and nearly 500 camping grounds. It concurrently offers thousands of km of roads accessible to car-based touring, family cycling, mountain biking and sensible 4wd driving; a substantial portion of that road system is also available for horse riding. **Apparently this is not enough!** Various single-interest groups push for increasing levels of access and 'suitable' support facilities, and even seek to pursue their activities in wilderness. **Every service provided detracts from conservation priorities and reduces funds available for creating new reserves.**

The detractions from the conservation values of new reserves⁹ are considered when determining the Plan of Management (PoM). The majority of these detractions relate to: creation and use of 2wd roads, family cycling and mountain biking facilities, 4wd access and horse riding; lesser concerns relate to abseiling and climbing facilities; an increasingly **encompassing concern is one driven by notions of enhancing visitation and tourism.**

- ***Visitation and tourism***

This is embodied in such things as 2wd access to scenic lookouts, in-park high-impact accommodation, professional tourism companies and bus impacts, and attempts to make wilderness more accessible. Obviously there is need for compromises and, as stated previously, the place for such compromises is determined during the development of the PoM.

From the Society's perspective the push to 'enhance the experience' by increasing accessibility to those less able, while at the same time using health and financial arguments to accommodate fitness enthusiasts (mainly mountain biking, but also horse riding) is generating encroachments at both ends of the potential visitation spectrum. **All such facilities come with initial costs and ongoing maintenance; all require a re-focus of funds from environmental conservation on to catering for day-visitors and mass-tourism.**

The Society is most concerned about these trends and urges extreme caution in pandering to too many non-environmental single-interests.

- ***Mountain biking and horse riding***

The conversation about mountain biking took place several years ago. Requests were largely acceded to because of the large numbers pursuing this activity, the mobilisation of these people through social

⁹ Regrettably, this also applies to existing reserves because the encroachment process is ongoing. No matter how carefully the changes are marketed, there are always environmental negatives.

media, the large funds available for campaigning, and the large industry associated with the bikes and clothing. This has had its consequences and they will be increasingly felt over the longer term.

Horse riding is the next invader, although the belief that horse riding should be accepted in the NPE has been around for a long time. Limited provision is made in many PoMs. The horse-riding industry is now making much stronger representation for broader access over a large number of trails in the NPE. Foolishly (in the Society's opinion) trials have been sanctioned in a range of parks and even in wilderness.

The damage which can and does result from horse riding is well documented. The mere thought of horse riding in wilderness beggars belief. It is regrettable that, with the exception of a few well-signposted existing trails in parks (other than wilderness), the NPWS seems intent on expanding access and embracing the consequences in terms of visitation and the misguided view of entitlement in this single-interest group. **The Society opposes this concept of entitlement, particularly at a time when funds are constrained and, in the face of climate change, conservation of the environment is of paramount importance.**

▪ *Final comments*

In an age of entitlement, high disposable incomes, trial by social media, and high-cost lycra-clad hobbies, the aim has become to access the NPE for personal enjoyment irrespective of the damage caused. There is seemingly little thought given to the reason for creating and expanding the NPE in the interests of conserving the natural environment, particularly at a time when population-expansion and the associated greenhouse-gas emissions are increasingly threatening it. **The Society believes that, irrespective of any short-term economic positives gained from increased visitation, it is incumbent upon NPWS and government to resist ill-informed commentary and remain true to its conservation objectives.**

A handwritten signature in black ink, appearing to read 'Brian Marshall', with a long, sweeping flourish extending to the right.

*Dr Brian Marshall,
For the Management Committee.*