

NATIONAL PARK MANAGEMENT PLAN REVIEW

COMMENTS BY THE ALLIANCE TO SAVE HINCHINBROOK (ASH)

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ASH greatly appreciates the opportunity to comment on the national park management plans for Hinchinbrook Island National Park, the Brook Islands National Park, Goold Island National Park and the Family Islands National Park.

ASH offers the following comments in regard to the common context of the island national parks:

A difficulty of writing and implementing management plans for these island national parks is that national park management plans are not designed to relate the subject of the plan to the intertidal and marine context or to other nearby islands.

ASH would welcome the development of some way of expressing the full meaning and context of the island national parks in terms of their inscription on the world heritage list. In this respect we have dealt with Hinchinbrook Island in some detail.

Ten years ago ASH and other conservationists sought the declaration of Hinchinbrook Island and Channel as a World Heritage Management Area (WHMA) under the Nature Conservation Act (Qld). In light of the refusal of the Queensland Government to write and implement a WHMA, its only mechanism of appropriate intent for these islands, and in light of our accumulated experience of world heritage area management by the Queensland Environment Department, the Wet Tropics Management Authority (WTMA) and the Great Barrier Reef Marine Park Authority (GBRMPA), ASH is now of the view that Hinchinbrook Island and Channel should be managed by the WTMA. Our reasons are specific to Hinchinbrook Island and Channel and are related in the Hinchinbrook Island section of our submission.

ASH has not examined as closely the options for the other island national parks. Nevertheless, we note that they too lack oversight by an appropriate body dedicated to the protection of the world heritage values and integrity of these small and fragile islands.

We note the jurisdictional difficulties of boundaries between Commonwealth and State waters, Great Barrier Reef and State Marine Park areas, and marine and terrestrial areas.

It is a disgrace that this wealthy nation, having sought world heritage listing twenty five years ago, has still not fulfilled the obligation under the Articles of the Convention to implement appropriate management for *all* the parts of the Great Barrier Reef World Heritage Area.

About eleven years ago, a former GBRMPA Chair (Dr. Ian McPhaill) stated publicly that the reason for the relatively good condition of the Great Barrier Reef Marine Park (GBRMP) at the time was *not* because of the supposed superiority of the GBRMPA's management, but because the GBRMP had not been subjected to the very high levels of exploitation arising from adjacent populations as had happened to coral reefs elsewhere in the world.

Around that time there was huge redundancy in the GBRMP's permitting systems, in spite of the discussion in Peter Valentine's 1994 Report to the World Heritage Unit, DEST (Hinchinbrook Area World Heritage Values) on this issue. It took years of hard

work by conservationists to convince the GBRMPA that a management authority must not issue permits for more visitation than was ecologically sound, in the belief that the weather and other extrinsic factors would render some part of the permit capacity unusable.

The same principle applies equally to the management of visitation on national parks.

Visitation must be strictly controlled, rather than relying on weather and seasonality of visitation to provide periods of recovery and happenstance rehabilitation. Such breaks in continuity of visitation should be viewed as an ecological bonus, rather than a hoped-for respite from limits that are set too high for ecologically safe continuity. Control must remain with the management agency, not be left to the vagaries of external factors.

HINCHINBROOK ISLAND

RECOMMENDATIONS

ASH makes the following 11 major recommendations on the Hinchinbrook Island National Park Management Plan:

1. Hinchinbrook Island's World Heritage status should be explicitly acknowledged and acted upon. Ie. the world heritage requirement of integrity should be stated in the revised Plan and be regarded (properly) as a guiding principle.

2. The revised Plan should describe in relevant detail the superlative natural phenomena, the areas of exceptional natural beauty and aesthetic importance of the Island.

3. In respect of visitation, the episodes of degradation must be prevented.

- a. QPWS staff must be better resourced so that they can properly monitor the permit system, prevent abuses, and ensure strict adherence to limits.**
- b. Parties of visitors must be informed that the Island experience is not an outward-bound or adventure expedition, not a mere setting for some physical endeavour, but an aesthetically complete experience where all the senses can be alive to the natural surroundings; that is, to appreciate the Island for its intrinsic values as required under its world heritage listing.**
- c. Visitors must be informed and educated about "what is wilderness" – how the human experience of the beauty of wild places relates to ecological connectedness – to encourage a reverence for one of the great cathedrals or temples of the earth –**

and how to “be” in a natural setting in a way that leaves the natural experience unaltered for the next visitor.

- d. The production and dissemination of a small but comprehensive CD for potential visitors would be a low-cost investment in long-term maintenance of the Island’s world-renowned respect as a large wilderness area.
- e. QPWS must retain at all times the right to close the Island, or parts of it, on the grounds of safety and/or asset protection.
- f. The limit of 40 people on the Thorsborne Trail must be revised downwards. ASH recommends that an absolute limit of 32 people on the trail at any one time would alleviate the risk of walkers meeting more than occasional others and achieve the goal of retaining the ecologically intact wilderness experience of the Island.
- g. Camping duration (set camping areas) should be limited to four days instead of seven.

4. In respect of walking tracks, hardening and rehabilitation must not be used as strategies to cater for visitation numbers that cause damage. The perceived need for these strategies is a clear indicator that the number limits must be revised downwards. It must be accepted that not everyone can go everywhere on the earth, especially at the same time. It must be accepted that some places must be kept aside – even “locked up” - for the future of the planet on which future generations of people will depend for the health and well-being.

5. The wording of the clauses under the heading “CONSERVATION” should be changed as follows:

- *visitor use is monitored and strictly controlled to ensure the integrity of the Island’s ecological, aesthetic and wilderness values.*
- *All native species and communities will be protected. Active protection programs will be implemented for species listed as endangered or vulnerable.*
- *a fire plan is developed to support the Island’s ecological values and its place in the wider ecological context of the Wet Tropics of Queensland;*
- *research is carried out to ascertain the population structure and habitat requirements of fauna species found on the island, including the beach stone-curlew, and the Island’s contribution to the species in the wider ecological context of the Wet Tropics of Queensland and the Great Barrier Reef World Heritage Areas;*
- *introduced species are eradicated or controlled.*

6. In respect of fire management, QPWS should develop and present a long term conservation-based rationale taking into account emerging factors such as climate change. QPWS should fully explain to each community, in readily understandable

terms, the rationale for its burning program; and to have it carried out in a timely fashion by professional officers with relevant experience.

7. In respect of the Beach Stone Curlew, the Queensland Government should fully protect this species (listed “endangered” in NSW and “vulnerable” in Queensland) in ALL of its habitat, not merely on some beaches kept free from heavy use, until such time as research indicates that a lesser level of protection would not threaten its long term viability.

8. In respect of pigs, QPWS should implement a program of pig eradication that would prevent or at least minimise the damage done by pigs on Hinchinbrook Island.

9. In respect of cane toads, QPWS should request the Department of Natural Resources and Water to enforce compliance with the resort lease conditions and remove the cane toads. Surely volunteer effort could be mustered by QPWS to assist in a program of cane toad removal that would prevent or minimise the damage done by cane toads in other parts of Hinchinbrook Island.

10. The wording of the clauses under the heading “RECREATION AND TOURISM” should be changed as follows:

Hinchinbrook Island is one of the world’s largest island national parks, and a world renowned wilderness island having exceptional qualities. Australia has accepted the obligation to maintain the island in its natural state for its superlative ecological, aesthetic, and wilderness values, and has undertaken to protect the integrity of those values for future generations, and to rehabilitate damaged areas.

To maintain the Island’s special qualities, visitation must be strictly controlled and visitor areas monitored to ensure that no degradation occurs.

Areas already degraded will be rehabilitated, including the area associated with the resort lease.

Presentation of the Island will be restricted to the purpose of appreciation of the area for its intrinsic values, as appropriate to a world heritage property.

Ideally, the whole island will be managed as wilderness, notwithstanding historical anomalies such as the present resort lease and its associated facilities and sites of cultural interest.

Camping, and numbers gathering at embarkation places and at sites of cultural interest, will be strictly limited.

11. In respect of mainland coastal development, direct legislative measures should be put in place through this revised planning process to eliminate the ongoing risks and destructive impacts to Hinchinbrook Island and channel from coastal developments. These include changes in hydrology and sediment flows, boat-strike

to Dugong and turtles, introduction of marine pollutants, and serious potential for introduction of invasive alien species. These all pose significant risk to Hinchinbrook Channel and Island and are counter to the WH Convention, as indeed to other international conventions to which Australia is signatory (eg. UN CBD), as well as national and state policies.

THE CONTEXT AND RATIONALE OF THE PLAN: WORLD HERITAGE AESTHETICS AND INTEGRITY

Although a state national park management plan was not designed to carry out Australia's international obligations, in the absence of direct Commonwealth Government oversight and legislation this Plan is the only instrument available. Most other protected areas of the Wet Tropics of Queensland fall within the Wet Tropics World Heritage Area and are overseen by the Wet Tropics Management Authority. Hinchinbrook Island, twice nominated for world heritage listing and clearly of outstanding universal value under several criteria, has however been left without a dedicated World Heritage authority to oversee its management.

Even with the best of intentions, the concepts of the *Nature Conservation Act (Qld)* are not those of the World Heritage Convention.

The linguistic terms of the HINPMP and of the World Heritage Operational Guidelines (2008) differ. These differences are not merely semantic; rather, the differences express the longer time frame, the higher ideals and different purpose of the international convention.

A number of terms that are relevant and important to the World Heritage Convention do not occur within the HINPMP at all, for example:

most important and significant natural habitats of in situ conservation of biological diversity ...

the most important sites for the conservation of biological diversity ... within species, between species and of ecosystems ...

Integrity

natural beauty

beauty

scenic beauty

or occur only once, when quoting directly from the World Heritage Convention, for example:

outstanding examples ...

superlative (natural phenomena)

exceptional (natural beauty)

The HINPMP lacks any expression of the superlative nature of the Island (*priceless and irreplaceable*);

The HINPMP lacks an expressed determination to prevent the loss of even one part of these *most prized assets*.

Statements of intent in the HINPMP such as “preserve its exceptional natural, cultural and scenic values” are not adequate to express the meaning of terms such as *aesthetics, beauty, integrity* and *wilderness*. Instead, the HINPMP favours the word *amenity*. The absence of this word from the WH Operational Guidelines indicates that the immediate and utilitarian visitor experience of “pleasantness” (Australian Oxford Concise Dictionary) that *amenity* denotes does not intersect with world heritage concepts such as “exceptional natural beauty”.

Integrity

The terms of the management of the world heritage property prescribed in the Operational Guidelines for the Implementation of the World Heritage Convention (Unesco, 2008) and must meet integrity requirements as follows:

88. Integrity is a measure of the wholeness and intactness of the natural and/or cultural heritage and its attributes. Examining the conditions of integrity, therefore requires assessing the extent to which the property:

- a) includes all elements necessary to express its outstanding universal value;
- b) is of adequate size to ensure the complete representation of the features and processes which convey the property’s significance;
- c) suffers from adverse effects of development and/or neglect.

This should be presented in a statement of integrity.

The integrity requirement must be met for all the criteria for which the site was listed. This includes, as noted in Valentine (1994) the integrity requirements for criterion (vii) (formerly criterion (iii)) – “*outstanding aesthetic value and include areas whose conservation is essential for the long term maintenance of the beauty of the site*”.

Apart from the reference to other plans (then to be developed) for the nearby islands, waters and coast, and the HINPMP, as a “framework for managing the islands and waters of a stretch of coastline between Lucinda and Mission Beach”, the concept of integrity seems entirely absent from the national park management plans.

The national parks within the Wet Tropics and GBR World Heritage Areas are elements of a larger whole, the integrity of which is neither visible nor alluded to in the individual national park management plans. This would not necessarily be a deficit where there also existed an overriding management authority dedicated to maintaining the integrity of the whole and overseeing permitting arrangements.

Hinchinbrook Island however is triply handicapped. Its ecological relatedness to the Wet Tropics of Queensland WHA is not formally recognised; it lacks world heritage management oversight, and it is an island surrounded by and intrinsically linked to

waters and wildlife which are still not protected appropriately as interrelated elements of a world heritage property.

Compare the HINPMP with the Introduction of the Operational Guidelines for the Implementation of the World Heritage Convention (Unesco, 2008):

The cultural and natural heritage is among the priceless and irreplaceable assets, not only of each nation, but of humanity as a whole. The loss, through deterioration or disappearance, of any of these most prized assets constitutes an impoverishment of the heritage of all the peoples of the world. Parts of that heritage, because of their exceptional qualities, can be considered to be of “outstanding universal value” and as such worthy of special protection against the dangers which increasingly threaten them (clause 1B 4).

And

The *Convention* aims at the identification, protection, conservation, presentation and transmission to future generations of cultural and natural heritage of outstanding universal value (clause 1B 7).

Peter Valentine (1994) noted:

“there is no doubt that the Great Barrier Reef World Heritage Area is of outstanding universal value and that there is an obligation on Australia to protect all of its parts”.

And in the context of the lack of detailed understanding of the GBRWHA ecosystem functioning at the time of listing:

“What may have seemed a relatively harmless activity could eventually be recognised as threatening the integrity of World Heritage values”.

Valentine (1994) also noted that the Great Barrier Reef World Heritage Area (GBRWHA) is an extraordinary natural property comprising a complete transect from the coast to the outer reefs.

Today we further recognise that the GBRWHA and the adjacent Wet Tropics World Heritage Area (WTWHA) together comprise a transect from the mainland mountain tops to the outer reef. The slim pieces of developed coastal land and the intensively developed urban nodes separating the two WHAs have had a disproportionate impact on the integrity and aesthetics of the Hinchinbrook region of the GBRWHA. Much of this can be laid at the door of the Commonwealth’s failure to include Hinchinbrook Island under the purview of the Wet Tropics Management Authority (WTMA). Queensland’s active opposition to accept the conservation requirements of world heritage listing have resulted in its failure to provide full and proper state level planning, whether to protect the national park and the adjacent marine park, or to control coastal development, assisted by the 1993 unlawful abrogation of responsibility for the Hinchinbrook Channel by the Great Barrier Reef Marine Park Authority (GBRMPA) and the GBRMPA’s continued failure to regard the GBRWHA as a world heritage property rather than a fun park and fishing bonanza.

The history of developments at Oyster Point, on the adjacent mainland south of Cardwell, is a disgrace, a 20 year long scandal of renegade developers, self serving politicians and career bureaucrats, of ongoing tussles between professional planners of good intentions and the managers who controlled the planning resources and rewrote the drafted plans. Internal state politics wasted precious time: thirteen years to produce a

management plan for Hinchinbrook Island National Park, a pre-eminent jewel in the crown of Australia's World Heritage listings; eight years to produce the Cardwell Hinchinbrook Regional Coastal Management Plan, and then only as the result of a Federal court case brought by a community group in 1996; and still NO MARINE PARKS MANAGEMENT PLAN for the Hinchinbrook Channel.

The ongoing risks and destructive impacts to Hinchinbrook Island and channel from this and other coastal developments cannot be overstated, and include changes in hydrology and sediment flows, boat-strike to Dugong and turtles, introduction of marine pollutants, and serious potential for introduction of invasive alien species. These all pose significant risk to Hinchinbrook Channel and Island and are counter to the WH Convention, as indeed to other international conventions to which Australia is signatory (eg. UN CBD), as well as national and state policies. Yet these all continue to occur in the area, and the impacts will only increase in future unless direct legislative measures are put in place through this revised planning process.

The failure of the Commonwealth government to give appropriate form to the responsibility it accepted when it sought WH listing for Hinchinbrook Island within the GBRWHA left Hinchinbrook Island and Channel in a no-man's land in relation to world heritage philosophy and protection. Valentine (1994) noted that the multi-use concept of the GBRMPA was out of step with both WH philosophy and the geography of the GBRWHA. His comment is as valid today as it was in 1994: a sad indictment on the Commonwealth's failure to ensure that its legislation and planning mechanisms properly satisfied its international obligations.

And still these world heritage listed islands are protected only in piecemeal fashion by management plans that are structurally unable to stitch the pieces together. The Plan's call for its adjacent tiny islands to be gazetted national park was, after many years, eventually heard; but its pleas for an accompanying marine parks management plan to enable the island's waterways and beaches to be properly protected, and for the island's integrity of tenure to be restored by having the road and esplanade revert to national park, have been ignored. One has to ask: to what purpose? The resort lease, the road and the esplanade remain a threat to the island's ecological and philosophical integrity as part of a world heritage property.

The Plan recognises that it has a role in fulfilling Australia's international obligations (Directions 2.1) – but fails to recognise that “to ensure international obligations are fulfilled” must be its priority – not merely “a major direction”.

The Plan regards other plans (then to be developed) for the nearby islands, waters and coast, and the HINPMP, as a “framework for managing the islands and waters of a stretch of coastline between Lucinda and Mission Beach”.

This was a worthwhile aim and consistent with the world heritage concept of integrity (a term nowhere mentioned in the HINPMP); nevertheless, the national park management plans are not formally linked to each other in a way that can achieve this aim.

The Plan recognises two “opportunities” or “values” (these terms seem to be used interchangeably):

1. Unique opportunity to conserve wet tropics natural communities in near-natural condition between sealevel and 1000 metres altitude.
2. wilderness and “semi-wilderness” recreational experience.

These concepts do not approach world heritage concepts, but they were welcome indeed at a time when Hinchinbrook Island (and other islands and cays) were exposed to multiple pressures of infrastructure development and high visitation levels.

Instead of arguing from first principles for each case, as above, the world heritage requirement of integrity should be stated in the revised Plan and be regarded (properly) as a guiding principle.

Aesthetics, scenic beauty, landscape, visual amenity

Hinchinbrook Island is one of the elements of the GBRWHA which specifically satisfied Criterion (vii), formerly criterion (iii): “*contain superlative natural phenomena or areas of exceptional natural beauty and aesthetic importance*”.

The description of the island in the Introduction to the HINPMP, as having “had almost no logging, no roads, virtually no agricultural or grazing industries and no urban development: its scenic and biological attractions are intact”; and “Hinchinbrook Island’s values as fragile and rare” do not obviously meet Criterion (vii) above.

The revised Plan should describe in relevant detail the superlative natural phenomena, the areas of exceptional natural beauty and aesthetic importance of the Island.

Aesthetics is too often interpreted as mere “scenic value” or “landscape value” or even “visual amenity”, missing the point that the beauty to be conserved under the World Heritage Convention is that inherent in the ecological elements and essential to the integrity of the world heritage property; not merely what can be captured in the narrow field of a photograph, and especially not one taken from a viewpoint that simply avoids capturing intrusive elements that may be present; and a view not separated from the other aesthetic elements present – skyline, soundscape, odours, and the tactile experience of wind, sun, mist and rain, or changes in temperature and humidity. This is why community groups, pursuing the protection of the natural integrity of the Hinchinbrook Island and Channel vista, have often referred to protection in terms of “the natural aesthetic appropriate to the area”. No rock walls, coconuts or artificial sand beaches on a mangrove coast, for instance. These simply look (and are) “wrong”.

Like the wilderness concept, the WH value of aesthetics can protect the integrity of ecosystems in a way that micro-management of visitation impacts (minimise, mitigate) cannot do.

The public respect for a large, extraordinary, magnificent and apparently pristine vista is generated individually within the viewer, being one’s own emotional response to the impact on one’s own aesthetic sensibilities. In the context of a very large scale vista of very great beauty, arriving upon the vista (particularly after prolonged physical effort) can result in a strong emotional response known variously as a peak or “aha!” experience and often described as having a “spiritual” connotation. The sense of wonder, awe and connectedness with nature so generated can have a profound positive impact on the person and their desire to protect the natural world generally and the place that generated that experience.

The protection of these large-scale values and their integrity cannot be maintained appropriately by segmented management plans that are unable (by their very structure) to have effect outside the managed segment’s boundaries.

A painfully obvious example of aesthetic impacts that are within the vista of the WHA property, but have no WH-relevant controls, is the ugly and ever-continuing destruction of natural coastal processes at Oyster Point: the debris of repeatedly reconstructed rock walls and the associated erosion where once was a tall mangrove forest, construction of breakwalls, many hectares of dead and dying coastal forest within Girrimay National Park, artificially raised land and waterfront construction, sandy beach where no natural beach could have been, and vegetation not only exotic but unsympathetic to the natural aesthetic of the Hinchinbrook Channel. It is twenty years since Tekin began damage to a shoreline, that, in 1994, could so easily have been restored; and fourteen years since the state government gave carte blanche to Keith Williams to literally destroy a whole natural coastline, in defiance of the state's own coastal policies, its own professional coastal engineering advice, scientific advice, and plain common sense.

Another example was described in Valentine (1994) - the scarring of the world heritage listed Hinchinbrook vista by highly visible quarrying activity (for developments at Oyster Point) on a hillside behind Cardwell.

Sadly, tragically, the "Port Hinchinbrook" related threats identified in Valentine (1994) have all come to pass. Present day QPWS management seems no more conscious than were the managers of 1988 of the great privilege inherent in being charged with the protection of natural assets of such world-class rarity, beauty and ecological wealth.

Detailed Comments on the Plan

PURPOSES – CONSERVATION; RECREATION AND TOURISM

Conservation

1. • *species of conservation significance, vegetation communities and animal habitats are protected from impacts associated with increasing human use;*
2. • *a fire plan is developed to maintain the mix of vegetation types;*
3. • *identified rare or threatened species, such as the beach stone-curlew, are studied, and any necessary conservation measures identified and started;*
4. • *visitor use is monitored and controlled to protect sensitive communities or species; and*
5. • *natural communities are protected from the effects of introduced species.*

1. Visitor impacts.

To maintain the wilderness character of the island, and the ecological richness that this can protect, visitor numbers must be kept at levels below the threshold of noticeable impact.

The present Plan may be regarded as a 10-year experiment. How has the Island fared? What difference can you see in QPWS photographic records of any given site in 1997 and 2008? Reports? Rehabilitation required?

Over the years, ASH has received reports of visitor impacts on the Thorsborne Trail: small litter such as sweet wrappers, misuse of the food lockers, track and tent site impacts. We appreciate the difficulty of managing a wilderness area – almost a

contradiction in terms – especially in the changeable weather of this tropical island and an under resourced QPWS office.

Re-routing a trail section as a means of providing an apparently pristine appearance while the used section recovers indicates that the trail had been overused.

Track hardening and rehabilitation must not be used as strategies to cater for visitation numbers that cause damage. The perceived need for these strategies is a clear indicator that the number limits must be revised downwards.

It must be accepted that not everyone can go everywhere on the earth, especially at the same time.

It must be accepted that some places must be kept aside – even “locked up” - for the future of the planet.

The wording of the clauses under the heading “CONSERVATION” should be changed as follows:

- *visitor use is monitored and strictly controlled to ensure the integrity of the Island’s ecological, aesthetic and wilderness values.*
- *All native species and communities will be protected. Active protection programs will be implemented for species listed as endangered or vulnerable.*
- *a fire plan is developed to support the Island’s ecological values and its place in the wider ecological context of the Wet Tropics of Queensland;*
- *research is carried out to ascertain the population structure and habitat requirements of fauna species found on the island, including the beach stone-curlew, and the Island’s contribution to the species in the wider ecological context of the Wet Tropics of Queensland and the Great Barrier Reef World Heritage Areas;*
- *introduced species are eradicated or controlled.*

2. Fire plan

If the QPWS has developed a fire plan, the community has not had it explained to them. This has been a source of great public dissension and criticism of the QPWS.

ASH is aware of objections to burning based on having one’s view of Hinchinbrook Island (from the mainland) spoilt by smoke; of tourists being shocked at the sight of blackened vegetation in Zoe Bay; sympathies for injured wildlife thought to die miserably in the aftermath of a fire; the belief that burning vegetation increases the planet’s atmospheric carbon dioxide levels; the belief that the burning rationale is made up or amended by local QPWS officers according to their own ideas; personal attachment of community members to local vegetation resulting in a grief reaction when it is burned; and the belief that the QPWS cannot adapt its fire regime to weather conditions because it is tied to weekday work hours, leading too often to wildfire.

ASH has considered many points of view and has no clear position at this time. ASH does not have attachment to supposedly traditional customs. Our position would be based solely on conservation purposes and outcomes.

ASH expects the QPWS to present a long term conservation-based rationale taking into account emerging factors such as climate change. Perhaps some hard decisions are required.

ASH also expect QPWS to fully explain to each community, in readily understandable terms, the rationale for its burning program; and to have it carried out in a timely fashion by professional officers with relevant experience.

3. beach stone curlew

The beach stone curlew, *Esacus neglectus*, isolated and overlooked creature of the margins of the sea, needs the shared protection of national park and marine park management plans. Where are the detailed and up to date studies on its needs and population trends? This bird, already on NSW's *endangered* list, suffers firstly through the effective fragmentation of its long thin habitat where human contact and interference is most likely; and secondly through lack of action to take its protection seriously – as an element intrinsic to a world heritage property.

The beach stone curlew research so optimistically mentioned in the HINPMP under review should be the subject of all the island national park management plans where their habitat occurs. Further, Queensland population should not be left to dwindle to a remnant *endangered* population (as in NSW), isolated to a few coastal islands. It needs protection along the mainland coast as well.

The abstract of a 2002 desk review by CSIRO's Amanda Freeman seems to say, on the basis of 211 reported (opportunistic) observations, that the distribution of adult birds may not have obviously changed but that little breeding activity and few juveniles have been reported during the eight years (to 2002) covered by the reported observations.

Experience at Oyster Point suggests that breeding adults are very attached to their nest site, and will return year after year even though chicks can no longer be raised there because of site disturbance and predation.

ASH has long held serious concerns that this species may be disappearing right under the noses of the QPWS. The birds may already be too few in numbers to make a comeback in the wild if so many of them are not raising chicks. Only when the population structure is understood will their status become clearer.

When will the promised research be carried out?

This species contributed to the inscription on the world heritage list of the GBR - *most important and significant natural habitats of in situ conservation of biological diversity ...*

The present Plan reflects a human use priority, coupled with a holding operation until such time as the species numbers fall dramatically enough to be noticed:

Hinchinbrook Island has about 26km of beach, presumably suitable for beach stone-curlews ... It is unclear how the current level of visitor use on Hinchinbrook Island is affecting beach stone-curlews. Obtaining more information should be a high priority for management.

Until precise information on breeding and other matters is available — and to protect beach stone-curlew populations — the following strategies will be followed to ensure areas free of heavy use are available to the birds:

QPWS will encourage a research project on the effect of human disturbance on beach stone-curlews.

If research results reveal a serious problem, visitor numbers will be limited further.

The above proposal is absolutely contrary to the requirements for world heritage protection.

It would be unconscionable to allow the beach stone curlew to slip unnoticed into the endangered list – as if no action need be taken until this point is reached.

ASH calls on the Queensland Government to fully protect this species (listed “endangered” in NSW and “vulnerable” in Queensland) in ALL of its habitat, not merely on some beaches kept free from heavy use, until such time as research indicates that a lesser level of protection would not threaten its long term viability.

4. **Monitoring and policing visitor use and activity.** From time to time the resources provided by the Queensland government have been insufficient for proper monitoring and policing. ASH is aware that this is a problem of Queensland national parks generally, and one which needs to be remedied generally. Gazetting more land for national park protection sounds good, but the potential benefits are often lost when the gazettal is followed by neglect.

Handing the management of national parks over to non-QPWS interests is generally an inappropriate response to the prospect of the cost of maintaining national park protection. Whatever the arrangement for management, national parks must remain firmly under the cardinal principle of the *Nature Conservation Act (Qld)*, and, in the case of the world heritage listed island national parks, these should also be overseen by the Commonwealth government.

This means no horses in national parks, and no fishing in national park waterways. Ministers have greater or lesser understanding of the national park movements and what its cardinal principle means, but Ministers come and go. QPWS bureaucrats are generally there for the longer haul, and it is these officers who must educate Ministers and insist on compliance with the *Nature Conservation Act*.

5. Pests

Cane toads and pigs are two pests present on Hinchinbrook Island (and Dunk Island). The HINPMP has been completely ineffective in dealing with these pests.

Pigs

Prior to 2002 the pig control program was effective in confining pigs to a small part of Hinchinbrook Island. Since the program was abandoned pigs have roamed widely over the island and have reached Zoe Bay. In a letter to ASH (2005) photographer Stephen Nowakowski said:

Prior to 2002, pigs were only found on the south east and western sides of the Island. Today pigs have infiltrated the eastern side of the Island and are destroying iconic beaches and bays such as Zoe Bay, Sunken Reef Bay and Blacksand Beach.

I have been visiting and exploring Hinchinbrook Island for well over ten years. My last visit to the Island was in 2002. In May and August this year [2005] I had the chance to go back to the Island and what I discovered truly sadden me. Pigs had managed to scale the backbone of Hinchinbrook Island and drop down into the wonderland of Zoe Bay and other bays and beaches. How could National Parks let this happen? Hinchinbrook Island, an iconic gem and listed twice on the World Heritage List devastated by pigs in just the last two years. If left unchecked it will be inevitable that pigs will now keep progressing north as there are no more natural barriers. They will ultimately end up at Cape Richards and Cape Sandwich and will destroy the wonderful orchids that are found there.

The damage I witnessed was so upsetting. Pigs have moved into virgin country and totally decimated scrub turkey nests, orange-footed fowl nests and wiped out snail and worm populations. Once these easy pickings are gone they will do serious damage to plant regrowth and devastate the biology of the region.

My belief is that the drought of 2002/03 forced the pigs to move beyond their comfort zone and push further afield in seeking fresh food. Therefore, they followed creek lines over the mountains. This can be seen whilst following the Thorsborne trail from Mulligans Falls to Zoe Falls. Pig scratchings are found all the way up the creek and gully. These scratchings were not there three years ago.

QPWS should implement a program of pig eradication that would minimise the damage done by pigs on Hinchinbrook Island.

Cane Toads

ASH is not aware of any formal attempt to control cane toad numbers on Hinchinbrook Island.

What research has been done to ascertain what damage they are causing on Hinchinbrook Island? What changes to bird and animal ecology have occurred through consumption of cane toad tadpoles and eggs? What amphibians have been displaced by cane toads?

ASH has video images showing huge numbers of cane toads in the shallow resort dam. Reports to ASH by visitors to the resort indicate that the lighting above resort paths is one of the attractants for cane toads, and that the cane toads being harboured on the resort lease are “huge” and the largest that can be seen in Australia. In sum, the presence of the resort is augmenting cane toad numbers and their presence on the lease is a breach of the lease conditions; yet QPWS is not taking any action to check this damaging but easily remedied pest invasion.

Worse, the presence of cane toads on the lease (and in such large numbers) was justified by QPWS management on the grounds that cane toads occur elsewhere on the Island. Such a response can only be interpreted as official negligence. It engenders no confidence that the Island ecology is being properly protected, revealing as it does a lack of understanding of the obligations inherent in world heritage listing. How simple is the corrective action needed – just require the lessee to comply with the lease conditions: physically remove adult cane toads from the

lease and clean out the dam and its surrounds, including that part of the dam which lies outside the lease area (another failure to enforce the resort's lease conditions).

When cane toads are breeding it is relatively easy to scoop the eggs and tadpoles out of pools. Toads are easy to catch when in the act of mating. ASH is aware that some visitors to the Island have already carried out minor actions of this type.

The QPWS should request the Department of natural Resources and Water to enforce compliance with the resort lease conditions and remove the cane toads.

Volunteer effort should surely be mustered by QPWS to assist in a program of cane toad removal that would minimise the damage done by cane toads in other parts of Hinchinbrook Island.

Recreation and Tourism

In 1994 Valentine (1994) noted that tourism can “contribute positively to nature conservation” but that “this has rarely been achieved without considerable compromise”.

It is often overlooked that the duty to present a world heritage area is always subject to the duty to conserve the property's values and integrity.

From the present Plan:

- the northern part of the island and The Haven are managed for moderately heavy use to cater for day visitors and campers at Macushla, The Haven and resort guests at Cape Richards;
- the remainder of the island is treated largely as an area which has wilderness qualities, with only a limited number of moderate-use visitor nodes such as Zoe Bay, Ramsay Bay boardwalk area, Nina Bay, Mulligan Falls and Little Ramsay Bay;
- wilderness values are protected and visitor numbers managed to ensure minimal impact with few visitor facilities provided; and
- the effectiveness of limits to visitor numbers are monitored and adjustments made from time to time.

In the four points quoted (above) the terms *moderately heavy use* and *wilderness qualities/values* seem to be pitted against each other. This would seem logical except that *wilderness* seems to include *moderate use* nodes.

This looseness of language is no longer appropriate in a Plan that is the only bulwark against visitor pressures that would quickly destroy its most precious value – its accessible wild beauty. Its accessibility may be seen as a great asset, but this is also its great vulnerability.

In 1997 conservationists argued (unsuccessfully) that the zoning system is not appropriate to this world heritage national park. The concept of a mosaic of levels of use is borrowed from the multi-use concept of recreation park management and is inconsistent with protecting the integrity (that is, of all the parts and their interconnectedness) of a world heritage property.

From Appendix A:

In this appendix, the terms ‘heavily’, ‘moderately’ or ‘lightly used’ are applied to beaches and other sites.

These terms are used relatively in the Hinchinbrook Island context and few if any would be considered 'heavily used' in comparison with certain other island situations. Generally, heavy use is defined as regular camping and/or day trips. Moderate use refers to regular walker use of the beach as part of the Thorsborne Trail and some use by private vessel owners. Light use is defined as occasional walker or private vessel owner use.

The statement that "heavy" and "moderate" don't mean what they say is not at all comforting: what would happen should this statement accidentally slip out of the revised Plan?

Far better to state up front the overriding intention of visitor management:

The wording of the clauses under the heading "RECREATION AND TOURISM" should be changed as follows:

Hinchinbrook Island is one of the world's largest island national parks, and a world renowned wilderness island having exceptional qualities. Australia has accepted the obligation to maintain the island in its natural state for its superlative ecological, aesthetic, and wilderness values, and has undertaken to protect the integrity of those values for future generations, and to rehabilitate damaged areas.

To maintain the Island's special qualities, visitation must be strictly controlled and visitor areas monitored to ensure that no degradation occurs.

Areas already degraded will be rehabilitated, including the area associated with the resort lease.

Presentation of the Island will be restricted to the purpose of appreciation of the area for its intrinsic values, as appropriate to a world heritage property.

Ideally, the whole island will be managed as wilderness, notwithstanding historical anomalies such as the resort lease and sites of cultural interest.

Camping, and numbers gathering at embarkation places and at sites of cultural interest, will be strictly limited.

25 Thorsborne Trail

Overseas users comment that the Trail is of international standard. There has been a policy of limiting use to 40 bushwalkers at one time. This limit has been set largely by monitoring use and is based on observed physical impacts and to a lesser degree on social impact. Monitoring has indicated that this limit has worked well in restricting

expansion of campsites and in reducing impact on user amenity.

These permitted numbers have been defined to suit the present situation of moderate use peaking in heavy use at certain times such as school holidays and Easter.

Despite the warning that "heavy" and "moderate" don't mean what they say, it is alarming to read

These permitted numbers have been defined to suit the present situation of moderate use peaking in heavy use at certain times such as school holidays and Easter.

From time to time ASH has received comments from Island walkers on the Thorsborne Trail and at other sites which can be summarised as “lost the wilderness feel”, usually because of the presence of groups of people or of obvious signs of human occupation.

From time to time during the life of the Plan, ASH members have had the impression that the present limit of 40 people on the trail at any one time is too many and too difficult to manage well. We have not however been privy to what was the relevant permit situation.

ASH is aware that the number of permit seekers declines in the wet season in response to the predicted discomfort of tropical heat and mosquitoes, resulting in fewer walkers and at times no walkers on the Island. This seasonality of permitting only accentuates the concern that the visitor limit applied in the cooler months is far too high.

Sometimes there are people on the Island walks without permits, or outside the area of their permit. It does seem however that there are also too many permitted walkers and campers at a site at one time; or, staying long enough to leave long-lasting reminders of their presence.

ASH appreciates that weather, disappointed walkers, unpermitted walkers and other factors can make life hard for the permitting officers. ASH is also aware that the QPWS Cardwell office provides an educational presentation to prospective Island walkers.

The occasional (opportunistically received) but recurrent expressions of disappointment made to ASH by Island visitors indicates that the limit of 40 is not achieving the highly important goal of retaining the wilderness experience of the Island. Without the information that QPWS presumably holds, ASH cannot suggest exactly where the problem might lie.

ASH is aware that ferry operators have carried unpermitted walkers to the Island; and that ferry operators may prioritise their economic gains (often inappropriately posed as “viability”) ahead of world heritage standard national parks requirements.

When permitted numbers have already resulted in soil and vegetation damage, and walker perceptions of “too many people” and “too many signs of people” on the trail, it is clear that the present limits must be adjusted downwards. The number limit expressed in the Plan must be seen as an absolute limit, not a goal to be met; not a flexible arrangement to be exceeded because last week or last month the limit was not reached.

The episodes of degradation must be prevented.

QPWS staff must be better resourced so that they can properly monitor the permit system, prevent abuses, and ensure strict adherence to limits.

Parties of visitors must be informed that the Island experience is not an outward-bound or adventure expedition, not a mere setting for some physical endeavour, but an aesthetically complete experience where all the senses can be alive to the natural surroundings; that is, to appreciate the Island for its intrinsic values as required under its world heritage listing.

Visitors must be informed and educated about “what is wilderness”– how the human experience of the beauty of wild places relates to ecological connectedness – to encourage a reverence for one of the great cathedrals or temples of the earth – and how to “be” in a natural setting in a way that leaves the natural experience unaltered for the next visitor.

The production and dissemination of a small but comprehensive CD for potential visitors would be a low-cost investment in long-term maintenance of the Island's world-renowned respect as a large wilderness area.

QPWS must retain at all times the right to close the Island, or parts of it, on the grounds of safety and/or asset protection.

The limit of 40 people on the Thorsborne Trail must be revised downwards. ASH recommends that an absolute limit of 32 people on the trail at any one time would alleviate the risk of walkers meeting more than occasional others and achieve the goal of retaining the ecologically intact wilderness experience of the Island.

ASH recommends that camping duration (set camping areas) be limited to four days instead of seven.

REFERENCES

Queensland Department of Environment: Summary of issues raised by submissions on the Hinchinbrook Island national park draft Management Plan May 1997

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Valentine P. (1994) Hinchinbrook Area World Heritage Values: A Report to the World Heritage Unit, DEST, 12th August, 1994. Peter Valentine, Tropical Environment Studies & Geography, James Cook University of north Queensland, Townsville.