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Cooloola National Park An Alternative Plan

**Options that deliver broad community benefit,
via inclusive collaborative process**

**A positive response to replace
top-down, industry-driven agendas
delivered via exclusion of community interest**

Cooloola Great Walk Eco-tourism Proposal

an alternative toward maximising local benefits

Background

The State Government's current proposal to allow private leasing and commercial development of luxury accommodation within Cooloola National Park offends large numbers of people due to the significant impact it would impose upon important public values. The impacts of this looming change bear not just upon Cooloola, but extend to threaten all National Parks in Queensland.

Furthermore, the project is proceeding without due public engagement and consent given the significance of the public values that it would directly affect.

These onerous concerns generate great public doubt upon the net return likely from the proposal in balance to the very substantial, but evidently overlooked costs. It is plainly apparent that a process of public consultation, guided by transparent objectives and principles, would deliver options that much better serve the just needs of nature, culture and public equity.

Validating claimed project benefits against actual needs and values.

The proposal now underway claims a number of beneficial objectives. However it fails to qualify these claims against any usefully broad measure of distinct local values and needs. This document seeks to identify development principles and options in direct reference to the full scope of local needs and opportunities.

Development principles/objectives can be broadly summarised within three categories:

1. Securely preserve and soundly project the internationally significant local landform.
2. Nurture genuine cultural and economic capacity for Kabi people
3. Stimulate socio-economic benefits to existing local and regional communities

These essentially 'grass-roots' categories should be certainly and adequately addressed ahead of any accruals to external and/or narrow interests such as Treasury and corporate operators. Gross returns achieved in lieu of such balance would be outweighed by real but unmeasured local deficits sustained.

Alternative Proposal - Overview

The document outlines a template for local development adjacent to the National Park rather than inside of it. It proposes the use of existing under-utilised QPWS assets at:

- **Elanda Point:** This is a large site on the Southern park edge in close proximity to the town of Boreen Point. Formally used as park ranger facilities, it now stands abandoned. The site is readily amenable as a launch place into the park, for activities in and around the standing outbuildings. It is perfectly located for development as a major centre for Kabi cultural expression and interaction.
- **Rainbow Beach:** This is another large site within the southern edge of the Rainbow Beach township. It functions as a QPWS information centre at one end, and has accommodation buildings at the other. QPWS functions under-utilise both the current and potential capacity. A co-partnership with Kabi, and possibly also Butchalla who hold claim to the landscape directly opposite, would offer evident benefits to all parties. This model would also add significant advantages to the town itself. The site has almost direct connection to the Great Walk and could be come a hub for other local walk and interpretation products.

In pursuit of these as yet unconsidered opportunities we seek support toward:

- opposing this current proposal and the grossly deficient process being used to facilitate it.
- a sound investigation of alternative development options that can more reliably achieve broadly beneficial outcomes whilst genuinely not compromising the vital ecological and public interest values involved.

Cooloola Great Walk Eco-tourism Proposal

1. Introduction.

1.1. Examination of the current proposal reveals that it would deliver:

- 1.1.1. Acute ecological damage and degradation via inappropriate commercial development within National Parks.
- 1.1.2. Chronic threat to the Park's current ecological baselines by placing commercial development as a competitive, potentially dominant, objective of Park purpose and function.
- 1.1.3. Sub-optimal outcomes for First Nations peoples.
- 1.1.4. Inequality amongst park users.
- 1.1.5. Insignificant positive outcomes environmentally, socially and economically.

1.2. Based on consultation with a broad range of community members and a number of Kabi Kabi people we believe it is generally advantageous to:

- 1.2.1. Keep all non-essential infrastructure out of the National Park whilst facilitating sustainable access.
- 1.2.2. Develop a First Nations cultural precinct at the recently disused but still functional QPWS centre at Elanda Point.
- 1.2.3. Engage a transparent public consultation upon upgrade options for the Cooloola Great Walk that will maintain genuine respect for existing ecological and user values.

2. Supporting information.

2.1. To support the statements made in Section 1 – Introduction, the following information is provided.

- 2.1.1. Diagram 1 on pg. 4 provides a landscape view the QPWS facility locations at Elanda Point and Rainbow Beach being proposed for review.
This view illustrates the linkages between these sites and a wide suite of surrounding values thus providing significant capacity for functional interface between matters crucial to Kabi cultural expression, including the internal features of the Cooloola National Park, and the wider community,
- 2.1.2. Diagram 2 on pg. 5 provides site details for the Elanda Point QPWS site.
- 2.1.3. Diagram 3 on pg. 6 provides site view and details for the Rainbow Beach QPWS site.
- 2.1.4. Table 1 on pg. 7 compares outcomes between the current proposal and a readily accessible alternative.
- 2.1.5. Points 3-8 (pgs. 8-12) provide further detail and evidence regarding the comparative options.
- 2.1.6. Point 9 on pg. 12 presents a list of requests for your consideration pursuant to the evidence provided.

Diagram 1
Alternative development strategies - Landscape view.

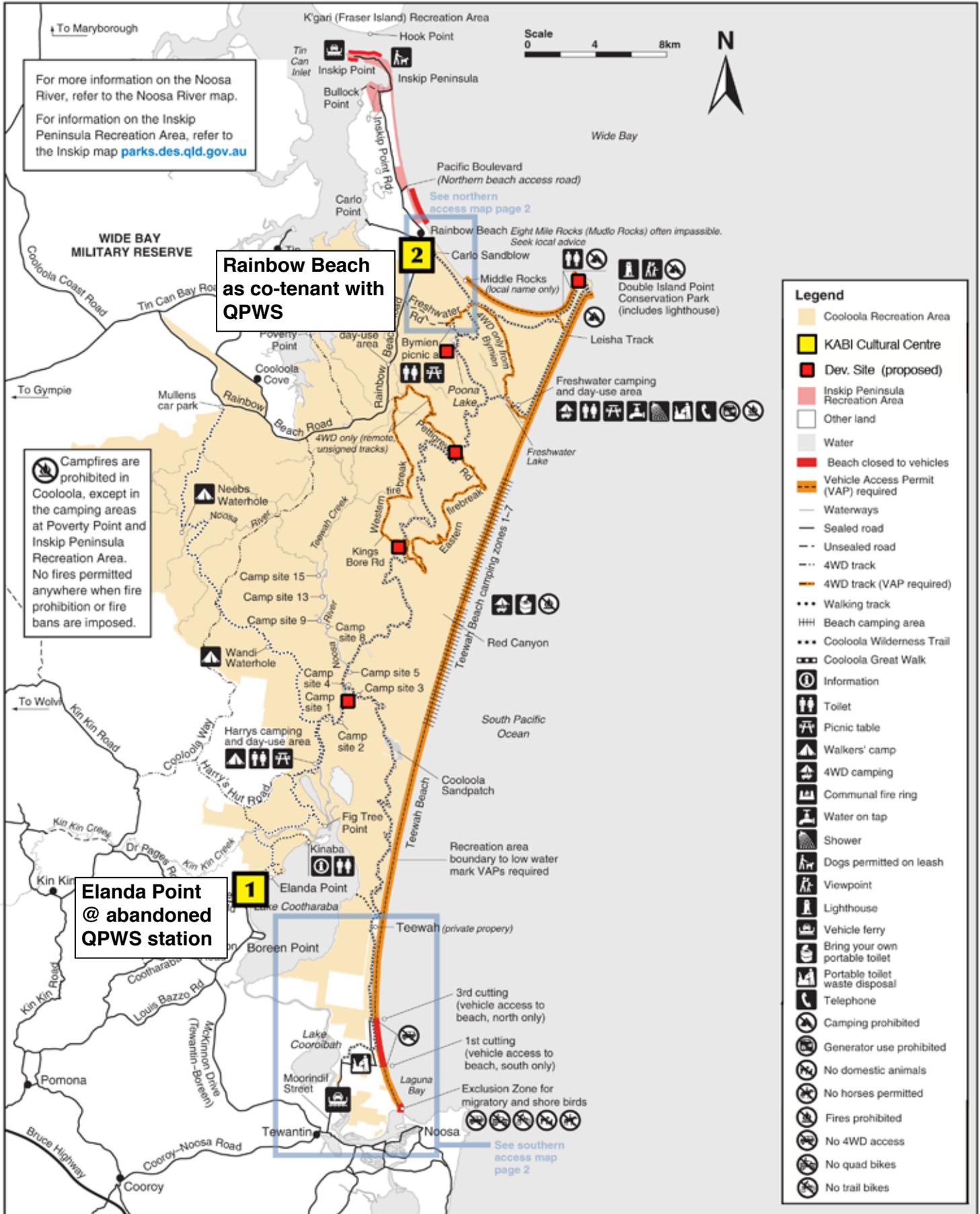


Diagram 2

Alternative proposal

Site Plan & Location

The yellow marked site be provided to Kabi people along with positive assistance for its development as a Kabi cultural centre, interconnecting with the Park and with local communities.

Site Features:

The site is State land, traditionally used by QPWS for park ranger activity and currently abandoned

Excellent all-weather access

Provides genuinely autonomous, direct interface with:

- Cooloolo National Park,
- Lower Noosa River
- Local communities,
- Town Infrastructure
- Tourist flows

This offers the Kabi people a genuine capacity for autonomous expression of culture, connection to Park and distinct economic development initiatives.

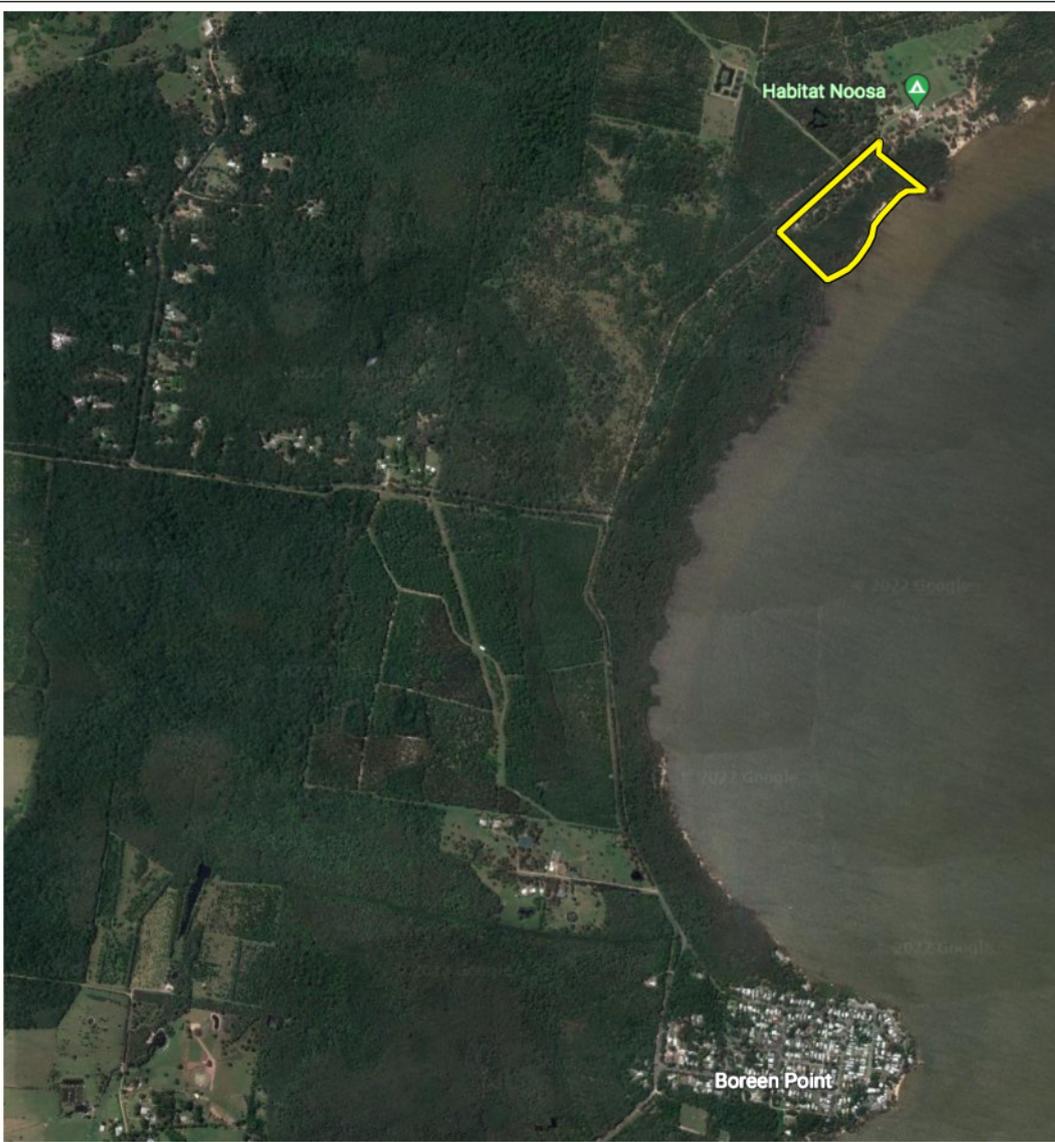


DIAGRAM 3

QPWS property at Rainbow Beach

Provides excellent interface with:

- transport
- local and visitor communities
- Great Walk and potential local walks and territory
- directly adjoining Butchulla claim
- existing facilities to use in conjunction with QPWS.



Table 1 - Proposal Outcomes / a comparison

COMMONLY DESIRED OBJECTIVES	OUTCOMES CURRENT PROPOSAL	OUTCOMES ALTERNATIVE PROPOSAL
<p>-1- showcase QLD's natural beauty</p>	<p>Degrades unique & sensitive ecological assets Places commercial purpose in direct contest with protection of natural and community assets within the National Park. Destroys the Cardinal Principle of nature being the priority function of National Parks.</p>	<p>Preserves high ecological values for future generations Maintains nature and the public interest as the primary objectives of Park management Maintains accent on equitable public access to natural, undeveloped landscapes.</p>
<p>-2- Increase autonomous capacity of local First Nation's culture & promote cross-cultural understanding.</p>	<p>Kabi cultural outcomes secondary to and dependent upon Non-Kabi private commercial operation. Cross-cultural education limited to small volume of commercial clients and predicated by commercial agenda. Kabi have no autonomous function or equity. Site provided for Kabi cultural use does not have equitable access across the claim group.</p>	<p>Enables:</p> <ul style="list-style-type: none"> • autonomous expression and development of Kabi culture • equitable access for all Kabi people. • fosters broad access to cultural knowledge and respect for Country • education opportunities for all of community
<p>-3- create local job opportunities</p>	<p>Provides limited opportunity for First Nations peoples. Lacks capacity for creative and management roles by Kabi. Largely separate from existing community and business centres.</p>	<p>Provides multiple opportunities for First Nations peoples, including genuine management and creative roles. Stimulates beneficial economic, social and cultural activity within existing and appropriate locations surrounding the park</p>
<p>-4- increase capacity for improved Park management and conservation outcomes</p>	<p>Extends and embeds disturbance through the core of the Park for limited and relatively insignificant benefits. Operation is restricted by park closures due to fire risk for min. 3 months/year. Promotes social inequality via exclusive pricing for synthetically altered prime features within the Park.</p>	<p>Increases operational and resource overheads for ground staff at expense of genuine Park ranger activity. Increases compliance issues beyond the Department's demonstrated capacity to adequately acquittal. Operational all-year round & not dependant on fire-risk</p>

3. Sub-optimal outcomes for First Nations peoples.

3.1 It is proposed that First Nations people will be employed by the proponent CABN. If the Queensland Government were genuine about providing First Nations peoples with genuine job opportunities, why is their employment excluding management roles and dependent on a private commercial entity?

As it stands the project proponent engaging First Nations people can also sell the lease to anyone of their choosing. It appears that First Nations people will be at the behest of affluent overseas clientele returning to Australia: this is not acceptable.

Caron¹ states in his journal article on indigenous employment the need to:

“Develop personalized career pathways to indigenous employees. Focus on hands-on rather than theoretical training, to better correspond to indigenous ways of learning. Collaborate with indigenous communities in the development of training programs. Assign functions allowing indigenous employees to contribute to their community’s well-being. Assign tasks that are respectful of the environment, given indigenous employees’ connectedness to the land.”

The current proposal achieves non of these outcomes.

3.2 The Queensland Government purport that Kabi Kabi peoples are significantly and equitably involved with the proposal. Inasmuch they are using the Kabi Kabi people’s engagement to justify and market the proposal. Yet significant anomalies exist toward this image. Community confidence in this aspect of the project would be assisted by provision of details regarding meeting dates and notes of full community consultation discussions between all Kabi Kabi people within the Native Title claim area. This has been requested but has not been provided.

3.3 Evident job opportunities for First Nations people will be cleaning cabins, waiting on guests, driving cars and buses; relatively menial tasks which will result in extended periods of time away from their families. From our discussions with Kabi Kabi people they have higher aspirations than what is being proposed. Educational, teaching, research and management opportunities is what they desire. The proposed job roles have little capacity to facilitate the sharing and understanding of First Nations culture.

3.4 How can the proposal represent genuine reciprocity between the proponents and the Kabi Kabi people when the proponent effectively controls budget and operational decisions? Moreover, the proposal provides the Kabi Kabi with no direct community contact. Their cultural and economic engagement is constrained to the private contractor’s clientele. We reasonably believe this highlights the insincere approach by the Queensland Government to incorporate indigenous knowledge and culture.

As explained further by Fuller²:

“Various governments have attempted to assist indigenous people overcome their disadvantaged position, however some people argue that such assistance can often place many Indigenous Australians in a poverty trap. A consequence is such that “passive welfare” has undermined Aboriginal Law, traditional values and relationships. Pearson³ defines passive welfare as transfers from Federal and State budgets to individuals and families, without reciprocation. In order to overcome such “passive welfare” Indigenous people must become increasingly self-reliant.”

3.5 Parliamentary speeches on the corruption and misuse of Native Title by the Government can be found here:

3.5.1 <https://www.facebook.com/AmyMacSouthBris/videos/2472508903045148>

3.5.2 <https://www.facebook.com/SenatorThorpe/videos/394074248865651>

4. Environmental degradation and inappropriate commercialisation of National Parks.

- 4.1. The development proposed at Sites P (Poona Lake) and N (Noosa River) would incur substantive impacts upon significant ecological and aesthetic values at those sites. These impacts would directly result from the commercial imperative to increase product 'spectacle' so as to validate the high ticket price. This distinctly demonstrates the ongoing threat and burden that private commercial expectations would place upon Park values if allowed tenure.
- 4.2. The proposed disturbance areas are not fixed. Recent correspondence with the Department of Environment and Science have said that *"No clearing may occur outside of the prescribed lease areas, including for fire management, without additional approvals being granted by local government, the State and the Commonwealth Government."* The Government's willingness to approve the proposal to date implies that additional clearing to facilitate construction will be approved without hesitation. Due to the extreme fire risk, clearing of vegetation for fire breaks will be inevitable.
- 4.3. The Queensland Government have stated in their own proposal documents that:
 - 4.3.1. *"The study area supports known and potential habitat for numerous flora and fauna species listed under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and/or Queensland Nature Conservation Act 1992 (NC Act)."*
 - 4.3.2. *"Most of the study area is mapped by the State as containing remnant vegetation, some of which comprises regional ecosystems (REs) that have a status under the Queensland Vegetation Management Act 1999 of Concern, as well as a number of REs recognised as wetlands."*
 - 4.3.3. *"State mapping indicates wetlands of high ecological significance occur within the central and southern portions of the study area, while the southern-most extent of the study area is a recognised fish habitat area that contains marine plants. A number of waterways mapped by the State as providing for fish passage also occur within the central portion of the study area."*
 - 4.3.4. *"The Noosa River Wetland system (portions of which occur within the study area) is recognised as a Nationally Important Wetland."*
 - 4.3.5. *"State mapping identifies all land within the study area as having State biodiversity significance."*

5. Inequality amongst park users.

- 5.1. We should be striving for equitable access in our National Parks. Currently all areas of the National Park are open and available to all community members without prejudice.
- 5.2. The proposal is based on a model of segregation, providing exclusive infrastructure for a strictly limited number of people. This directly undermines the community function of the National Park which is to provide an inclusive space for all community members. Weiler⁴ states that:

"... National Park management agencies cannot afford to be complacent about the implications of the extinction of experience. The loss of opportunities to experience and engage with nature, even in regards to just some segments of society, is potentially damaging to public support and to the future of national parks. As agencies charged with the responsibility to protect and sustain nature and heritage environments and values, managers have an obligation to protect and sustain not only these environments but also the visitor experience itself."

Also Dahlburg⁵ reiterates this in describing the outcomes of changes within the Kruger National Park:

"Local people now have the legal right to access parks and reserves, but often only as paying visitors which poor people cannot afford, and so the majority of visitors remain white South Africans and foreign tourists - Cock & Fig⁶. The recent trend of out-sourcing and commercialisation may create new injustices, for example through the development of private lodges that obtain exclusive access rights within parks - Cock & Fig⁶."

6. Insignificant positive outcomes environmentally, socially and economically.

- 6.1. The fact that the proposal is largely based on economy driven tourism is flawed as the locations are chosen based on the pristine natural features of an area, yet the fixed infrastructure and increased human impact will seriously degrade the environmental significance of that area.

After investigating the sustainability of ecotourism, Wall⁷ explains that:

“The quest for sustainable tourism may be sufficient to meet the narrow interests of the tourism industry but the search for sustainability more broadly conceived, in which the tourism industry may be a partner and in which tourism is viewed as a means rather than an end, is likely to address more fundamental development goals. Just as tourism is rarely the sole cause of the problems for which it is sometimes indicted, it is unlikely to be the complete solution to all development needs.”

- 6.2. One of the proposal objectives is to showcase Queensland’s natural beauty, yet it relies on significant built infrastructure that will directly result in the degradation of the fragile and significant environment that the consumer will have come to experience. These negative effects may well be amplified by the Queensland Government’s capacity to effectively manage the commercial operations within the National Park.
- 6.3. The State Government’s ability to enforce and manage leasing agreements within National Parks is questionable. This is shown in the conclusions of the (ANO 2019)⁸ Performance Audit into the management of Commonwealth National Parks which concluded that:

“The Director has not established robust arrangements to ensure that corporate, park management and operational plans are being implemented.” And that *“In particular, there is criticism that the Director has not effectively engaged the boards of management to establish constructive relationships with traditional owners at the jointly managed national parks.”*

This precedence of the incapability to manage National Parks is also described in the journal by Dahlburg⁵:

“The philosophical shift from ‘fortress conservation’ to ‘people and parks’ is taking longer than envisaged due to the complex interaction of factors such as top-down institutional structures, unequal power relations, and a lack of capacity and control at the operational level of park governance.”

7. Principles and elements for a better alternative.

- 7.1. **Keep all non-essential infrastructure out of the National Park whilst facilitating sustainable access.**

To sustain biodiversity and natural ecosystems there is a need to deemphasise the construct of built infrastructure within natural environments: we should be immersing ourselves in the environment not building over it. This reflects the Cardinal Principle of Parks management.

The negative impacts of inappropriate commercialisation is summed up by Hadwen’s⁹ report on sustainable tourism which focused on another area within the Great Sandy National Park. He explains that:

“Put simply, excessive tourist use of the dune lakes on Fraser Island could deleteriously affect their ecology and in turn, their aesthetic appeal to tourists.”

Further supported by Wall⁷:

“If the environment and its treasures are not maintained, then the resource base for ecotourism is destroyed; if tourism continues, it is unlikely to be ecotourism unless one can persuade visitors to come to restore a severely degraded environment.”

7.2. Insert a First Nations cultural precinct at the recently disused but still functional QPWS centre at Elanda Point.

Consider a similarly focussed capacity at the Rainbow Beach QPWS facility, possibly in conjunction with the adjoining Butchalla claim.

7.2.1. The QPWS centre at Elanda Point has existing services and infrastructure on a disturbed and available portion of land that is on the shores of Lake Cootharaba. It is located on an existing road with ample traffic from visitors entering the National Park which would support First Nation people's commercial ventures. The money already spent by the State Government on the current proposal could have been used to fund a new cultural centre.

7.2.2. A cultural precinct operated solely by First Nations people without having to be employed through a private 3rd party is the only way to ensure economic independence and genuine exchange of culture as stated by Hyndman¹⁰:

"Indigenous self-organization, which brings them directly into the decision-making process on ecological considerations that affect their lives, is the best future for reconciling the interdependence of cultural and biological diversity. Economic independence is seen as extremely important, but without the strengthening of indigenous organization, a new form of environmental dependency could develop. Doing so means strengthening existing institutions and creating new ones in order to control their own destinies, such as conservation through self-determination with control over export and transport agencies and cultural centres for depositing their indigenous knowledge."

7.2.3. A cultural centre allows for genuine cultural experiences and exchange throughout the National Park. The current proposal provides no capacity for for Kabi Kabi cultural interaction with the current user base of over 300 thousand people per year. It provides no opportunity for this broader horizon of cultural learning and growth to better preserve Park values. Yet this is something that is clearly and urgently required given the current level of environmental and cultural abuse occurring on a daily basis.

Bunten¹¹ explains that:

"There is a difference between the tourism that accommodates a perceived Western tourist gaze at the expense of cultural integrity and one that is carefully crafted to appeal to tourists (and the corporate entities that deliver them) while upholding local values. Tourists can sense the internal colonization in the former. They respond to it through pity, mockery, and commentary to the effect that what they are seeing is 'fake.' By the same token, tourists experiencing Indigenous value-based tourism approach their experiences from a position of cross-cultural sharing and mutual understanding. Here, tourists often ask insightful questions. They leave their tours commenting on the humanity they share with their hosts, sometimes in tears, embracing their new friends at their departure."

7.2.4. Having one centrally located cultural centre has the following positive affects. Direct access to the lake and therefore the National Park; convenient access for those employed to maintain family life therefore allowing increased job opportunities; considerable existing visitor traffic; minimises unnecessary traffic movements within the National Park, no cleaning, food transport, boat traffic etc; and provides multiple education opportunities for the local community.

7.2.5. There is ample opportunity to activate the periphery of the National Park by using the accommodation and public infrastructure located at Boreen Point and Rainbow Beach. Both are positioned on the edge of the National Park and have accommodation facilities, camping infrastructure and pubs/restaurants already available to those who wish to participate in cultural immersion walks. Using these existing services holds substantially more value to existing local businesses. **n**

8. Conclusion.

- 8.1. The current Great Walk Ecotourism Proposal is fundamentally flawed as, in reality, it fails to address the relationships between the environment, the community and First Nations peoples.

Hyndman¹⁰:

"In most cases, re-establishing or reinforcing indigenous control and self-determination is the only solution if biodiversity goals and indigenous rights are to be respected. In so doing, indigenous people could quite easily become managers of protected areas, buffering them from the impact of encroaching colonists, ensuring their own defence and right to self-determination and thus preserving and continuing their own time-proven and culturally based sustainable resource management systems."

- 8.2. Building fixed infrastructure to serve a privileged minority is a westernized development model that will degrade the environmental and cultural values associated with the National Park.

Bunten¹¹:

"Instead of seeing Indigenous tourism as merely a means of alleviating poverty, it can be measured in terms of transmuting cultural and spiritual capital into the potential for economic gain. Therefore, returns on Indigenous investments in tourism should be analysed in terms of overall well-being. We should be paying attention to the ways in which commodifying Indigenous resources, including landscapes, foods, stories, songs, dances, and worldviews, upholds family values, spiritual beliefs, cultural knowledge, and pride. If Indigenous businesses do not adhere to traditional principles bound to hospitality, trade, and ethics, they are in danger of simply reproducing colonizing tropes of representing 'the Other.'"

9. Our position and request.

- 9.1. The foregoing makes evident that a cultural centre operated solely by First Nations peoples provides substantially more enduring value to the environment and the community than does than the current proposal.
- 9.2. The current proposal has been offered to key stakeholders, and in particular First Nations' peoples, as a take it or leave it development. This necessitates the choice of taking something over nothing. It does not offer the choice of an optimal outcome. We believe in advocating for a genuine proposal with genuine outcomes.
- 9.3. We ask for your support by communicating this alternative to friends, associates and community leaders and by encouraging discussion of its core principles.

Reference List:

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- (7) Wall, G. (1997). Is ecotourism sustainable?. *Environmental management*, 21(4), 490.
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- (11)(Bunten, A. C. (2010). More like ourselves: Indigenous capitalism through tourism. *American Indian Quarterly*, 34(3), 305.