



Submission from the

Queensland Outdoor Recreation

Federation Inc

to the

Project Team and Stakeholder

Reference Group

for the

Investigation of Possible Reform of

Government Forestry Functions

In Queensland

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Signed:

A handwritten signature in cursive script that reads "K. Kingsford".

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1. Executive Summary

The Queensland Outdoor Recreation Federation Inc. (QORF) represents the interests of the outdoor recreation communities in Queensland, including participants and suppliers of outdoor activities for recreational or educational purposes. Following the ministerial announcement of a possible “Reform of Government Forestry Functions”, QORF was invited to represent recreational communities on the Stakeholders Reference Group (SRG). This submission addresses various concerns of the recreation communities. Detailed considerations have been hampered by the lack of available detail about possible / preferred government options for business structure, land tenure arrangements and administrative arrangements.

Currently the plantation estates are promoted as publicly accessible and publicly owned land and are regarded and used as such by the general public. Maintenance of continued access is the key concern of the recreational communities due to past experience with unexpected and possibly unintended changes in recreational access to what were previously publicly accessible government lands.

In representing community recreational interests, it is the view of QORF that:

- plantation lands should remain under State Forest tenure maintaining public ownership, public access and public accountability;
- there will be widespread opposition from both the general community and recreationalists to vesting of plantation lands in a government owned corporation;
- new plantations should be established and declared as State Forests to add to the “publicly accessible open space network” so bringing recreation, economic and community health benefits;
- the current business group model for the Queensland Department of Primary Industries - Forestry should remain because of the unpredictable threats to recreation opportunities under various alternate corporatised business models;
- recreation opportunities and infrastructure, particularly recreation trail alignments, within the plantation estates must be protected in all leases, contracts and agreements associated with these lands.

QORF notes that the Department of Natural Resources and Mines has been suggested to the SRG as a “likely option” as the future administrator of recreation on State lands other than the protected conservation estates. Regardless of the final administrative responsibilities and arrangements, QORF emphasizes that the recreational communities expect:

- consistent application of policies and processes within and between departments, regions and management districts;
- that conditions for access to the plantation estates should be more liberal and the range of allowable recreational activities should be wider than on the conservation estates.

On behalf of recreationalists, QORF holds serious concerns and reservations about:

- provision of recreation opportunities by Community Service Order arrangements and QORF suggests further community consultation would be needed under this option;
- funding of current activities on a new “user pays” basis that could initiate “recreational succession” because the richest and most commercially orientated sporting groups (eg car rally drivers) would probably displace the typical recreational users on the basis of their “capacity to pay”;
- loss of Freedom of Information access to material relating to recreation administration and charges under a government owned corporation business model;
- the current incremental withdrawal of existing access and recreational facilities on forestry lands under existing management arrangements despite the acknowledged growth in both population and recreational demands;
- the lack of foresight, planning and innovative arrangements for provision of outdoor recreation opportunities in the Queensland forestry sector.

In summary, QORF asks that the Charter Preparation Committee and the Project Team take the broadest view of potential land uses and administration within the publicly-owned forestry land estates of the Queensland Government, giving clear acknowledgement to the importance of the established and growing interests in recreation on these lands.

2. Context of Response

The Queensland Outdoor Recreation Federation Inc (QORF) is the peak body representing the interests of the outdoor community in Queensland. Members of QORF include:

- state activity associations (eg Cycling Qld, Qld Association of 4WD clubs, Qld Endurance Rider's Association, Qld Orienteering)
- state not-for-profit community organisations (eg Scouts, Guides, Duke of Edinburgh's Award)
- state interest groups and professional associations (eg Qld Camping Association, Tread Lightly!, Outdoor Educator's Association)
- commercial operators of education and recreation programs
- local governments
- educational establishments (schools, TAFEs, Universities)
- sport and recreation and outdoor education centres
- individuals.

Therefore, QORF represents the interests of:

- independent recreation participants
- club based outdoor recreation
- not for profit community organisations
- school and tertiary outdoor educators
- centre or facility-based outdoor education and outdoor recreation (who may use State Forest areas for sections of "off-site" programs)
- commercial operators.

Under the arrangements for this investigation, the consultation process does not allow for any of QORF's member organisations to submit a response to the Project Team from their individual perspective. Further, there are some sections of the recreational communities who have a vital interest in these matters but are not within the scope of QORF's charter or membership (eg some motor sports and animal racing groups). QORF's response therefore attempts to provide an overall perspective, indicating the impact on QORF's membership as a whole in addition to addressing perceived issues for other sections of the broader recreational communities.

3. Context of the Recreational Communities' Concerns

Over a period of more than 40 years, the Queensland Department of Forestry and its administrative successors have publicised and managed the plantation estates as an integral part of the network of publicly accessible and publicly owned State Forests. Throughout this time, the central management message for the public was the concept of "multiple use" of State Forests in which recreation, amongst other uses, was considered and promoted as one of the more important and legitimate uses of the managed native forests and plantations. Signs promoting this "multiple use" philosophy are common at State Forest boundaries throughout Queensland.

In this regard, it is notable that the press release on 17 July 2004 by the Minister for Primary Industries and Fisheries, the Hon. Henry Palaszczuk MP, announcing the possible Reform of Government Forestry Functions did not directly mention recreation as an important function of the plantation or native forests, or in their management.

Subsequently, the Environment Minister, the Hon. Desley Boyle MP, in her press release of 28 October 2004 announcing a world class conservation reserve system for South East Queensland, specified "horse riders and other recreational users would be able to continue to access plantation areas managed by the Queensland Government and the remaining hectares of native forests currently managed as State Forest".

However, the recreational concerns relating to possible forestry reforms extend across the whole state. In particular, the conversion of many State Forests to conservation tenures in North and Far North Queensland already has resulted in more recreational attention to the plantation estates. This conservation development has exacerbated the trends of increasing recreational use of the remaining State Forests (particularly their plantation areas) under the rapid growth of populations along the coastal zone. This trend has been commented upon by forest managers throughout the state.

The Draft South East Queensland Regional Plan, released in October 2004, shows the vast majority of the Department of Primary Industries - Forestry plantation estate in SEQ as "Publicly accessible regional open space" (Map 5, page 24) again reinforcing the public perception of the plantation lands as part of the recreational assets of the state.

On 30 November 2004 QORF received an invitation from Mr Gerard Bradley, Chair of the Charter Preparation Committee, to represent the recreational community on the Stakeholders Reference Group (SRG) which was to consider the options associated with the investigation into the possible transformation of the plantation management functions of DPIF into a Government Owned Corporation (GOC). This offer to QORF was accepted (phone call 20 December 2004) and Mr Andrew Graham, a QORF staff member, was nominated to represent QORF at meetings of the SRG.

It is in this context that QORF makes the following representations in relation to the future arrangements for management of the publicly-owned timber plantation areas and the closely associated native forest estates.

4. Problems in Preparing Specific Responses to Issues

In the initial SRG discussions of 27 January 2005, Mr Constantini, the Project Team Leader, emphasized that the current considerations were only an investigation of the proposal and that the Charter Preparation Committee (constituted by the Under Treasurer, the Deputy Under Treasurer, the Director General Department of Primary Industries and Fisheries, the Director General Environmental Protection Agency, and the Executive Director Economic Policy, Department of Premier and Cabinet) was providing advice to Cabinet. Mr Constantini stressed that a public benefit test would have to be met, and that no particular administrative model had been selected *a priori*. In the initial SRG meeting the widely disparate elements of the spectrum of possible ownerships and management scenarios were canvassed, ranging from the current commercialised Business Unit through to the various forms of Statutory Government Owned Corporations.

In the absence of detailed knowledge of what is the preferred position of the Charter Preparation Committee on particular issues of great concern to the recreation communities, QORF therefore has to address these various issues of concern in a general manner. (From SRG discussion papers circulated to date, it appears that this problem also applies to the considerations of the SRG more generally.)

The range of concerns of the recreational communities include the scope of the business charter of the business entity to be formed, land tenure and associated rights of access, leasing arrangements (both head leases and any production leases), contractors' and managers' obligations to maintain recreation opportunities and infrastructure, the future recreation administrative arrangements for both the plantation and native forest estates, and funding arrangements, particularly the adequate and enduring resourcing of any Community Service Obligations (CSOs) including maintenance of transparency and equity through availability of FOI access to administrative data.

5. Land Tenure

Continued access for recreation is the central issue in discussions relating to the future land tenure of the DPIF plantation estates and associated areas of native forest. Despite the recorded discussion under Item 5 in the Draft Minutes of Meeting 1 of the SRG on 27 January 2005, "There is no intention that the current access and usage rights would change for third parties (eg stock grazing, recreation use etc).", past experience with unexpected and possibly unintended changes in recreational access to what were previously publicly accessible state government lands means that this issue will remain of central interest to the recreational communities.

Regardless of any new business model that may be adopted for the current operations of DPIF, it is the view of QORF that the plantation lands should remain under State Forest tenure to ensure that the concepts of public ownership, public access and public accountability be maintained. QORF would not support any change of land tenure for the current State Forest plantation estate. In particular, there would be strong objections from QORF and the broader sporting and recreational communities to any move towards transfer of the plantation lands into another tenure that would be vested in a GOC, particularly as general discussion on the land tenure topic at the initial SRG meeting indicated that this was the likely "preferred industry option".

QORF, and probably the wider recreational and sporting communities as well, would have particular concerns about possible sale of current plantation lands, even in association with other replacement areas. Should the tenure of the plantation lands be

altered from State Forest, this action probably would allow disposal or changes of land use without the degree of parliamentary and public scrutiny that is required currently.

QORF supports land acquisitions for the purposes of establishing further plantations (of either native or exotic species) and suggests strongly that the public good would be best served by subsequent declaration of these areas as State Forest regardless of other business entity and operational arrangements.

Such new State Forest areas could make valuable contributions to the development of the “publicly accessible open space network for SEQ” that is proposed under the Draft SEQ Regional Plan (page 26). The initial investment would be associated with a range of community benefits including financial dividends, particularly in terms of the often neglected but important commercial aspects of recreation (eg gear and equipment sales, food and travel expenditure, tourism components) and the financial savings through increased personal and community health.

6. Scope of the Business Charter for any new Entity

Given the recent unsatisfactory situations for the wider recreation and sporting communities arising from the regional operations of SEQ Water as a GOC, it is the view of QORF that the current business group model of DPIF should be maintained. This position is based on the unpredictable threats to current and future recreation opportunities on the State Forest estate under various corporatised business models in which the continuing provision of recreation might not be specified or regarded as either a core or peripheral function of the entity. Under alternative business models, subsequent operations could contrast strongly with the present style of management in which it is obvious that recreation currently is regarded as a legitimate and key function of both the native and plantation estates within State Forests with many of the managers having had both training and experience in this regard.

In the initial SRG meeting, although very general reference was made to various recreation management developments in Victorian plantations under corporate and private enterprise structures, no details or contacts were provided to assist in assessing the suggested management models.

7. Leasing and Contractual Arrangements

Regardless of whether or not the present departmental custodial arrangements for the plantation estates remain in place, QORF is of the view that the future of recreation opportunities within the plantation estates must be protected by appropriate terms and conditions within all leases and contracts associated with the management of these lands and of the timber operations.

Within the general community there is no knowledge of the preferred position of the Charter Preparation Committee or of the “industry” in relation to arrangements for either (i) the possible “head leases” (potentially the leases setting out the terms and conditions under which the Environmental Protection Agency, as custodian of the plantation estate lands, conditionally leases the land to the DPI Forestry business unit subject to adequate provision for recreation facilities and access), or (ii) the various possible leases and/or contracts associated with tree planting, stand maintenance, tree harvesting and hauling, and cattle grazing.

The terms and conditions of these leases and contracts must include details of the contractors’ and managers’ obligations to maintain recreation opportunities and recreational infrastructure during general operations. Obviously, there will be some specific operations on restricted sites that will be incompatible with recreation for relatively short periods at particular times of the production cycle (eg herbicide spraying, tree felling, log hauling). However, it will be important that arrangements are in place to schedule such timber operational tasks so as to allow and maintain recreational access elsewhere in each plantation area. In particular, any recreation trail or forest drive that provides district or regional links should be given special consideration. The routine relocation (including provision of temporary new signage) of the South Australian Heysen Trail to accommodate timber operations within plantation estates is an example of the satisfactory resolution of this type of potential conflict. Similarly, the arrangements for providing leases for cattle grazing should accommodate continued recreational use of the forest area through provision of appropriate (*ie* safe, visible) fencing.

The historic, well publicized and highly rewarding Dalrymple Gap Track, just south of Cardwell, is a Queensland example of such a potential situation as this trail alignment passes through a mosaic of plantation and native forests within the State Forest area using plantation management roads for sections of the route.

8. Future Administration of Recreation in DPIF Estates

Currently, the Environmental Protection Agency (EPA), as custodian of the plantation estate lands, manages and administers recreation within State Forests including the areas of the plantation estate. EPA officers issue and/or administer the various permits associated with recreation, (eg Permits to Traverse, Camping Permits, Group Activity Permits, Commercial Activity permits). While the intent of the arrangement was that continuous consultation between DPI Forestry and EPA would occur, anecdotal evidence from across Queensland suggests that there may not be appropriate communication between these two bodies in this regard. It is suspected that the roles and activities of the EPA officers as administrators of recreation on the State Forest estates are not seen to be as high priority tasks as are management activities for the conservation estates. It may be that inadequate financial arrangements have been established to cover this cross-jurisdictional administration.

There has been some discussion about the possible transfer of responsibility for administration of recreation on State lands, other than the protected estates of EPA, to officers of the Department of Natural Resources and Mines (NRM). This scenario was indicated to be a “likely option” at the initial meeting of the SRG. This possible course of action is consistent with the roles specified for NRM in the Administrative Arrangements Order (No. 1) 2004.

Whatever the final administrative arrangement, QORF emphasizes the need for consistent application of policies and processes within and between departments, regions and management districts. It will be essential that the administration of recreation in the plantation estates is undertaken with regard to the heavily disturbed nature of the settings, and the relative lack of threats to the tree crop from recreational use. (Plantation forest managers advise, for example, that there is no threat to either the native or exotic pines from the Root Rot Fungus, *Phytophthora cinnamomi*). Many of the

criteria considered in planning for recreation management in the plantation areas should differ from those applied in the protected estates. Correspondingly, the conditions for access to the plantation estates should be more liberal and the range of recreational activities should be wider than on the conservation estates.

9. Funding Arrangements

Detailed discussion of funding arrangements is hampered by the lack of guidance for QORF (and for the SRG more generally it appears) as to the preferred business structure, the land tenure arrangements or the administrative responsibilities for the plantation and residual State Forest estates.

In preliminary discussion with senior DPIF staff, it was suggested that provision of recreation could be ensured under any of the GOC corporate models by use of Community Service Obligations (CSO) model. If the provision of recreation was not to be one of the recognised, designated and focal tasks of such an organization, the recreational community remains sceptical of the degree of enthusiasm with which the CSO would be undertaken. If this course of action were to be taken, the intent and wording of the CSO should be a matter upon which realistic community consultation is undertaken. Further, the adequate and enduring financial allocation for any CSO for recreation would need to be clearly specified and guaranteed. QORF is of the view that the primary source of such funding should be from annual budget allocations of the State government, with inflation adjustments, rather than from unpredictable community support grants from a GOC (as in the numerous community projects undertaken by Powerlink). If new recreational pursuits are attracted to the State Forest estates, and if these new activities require activity-specific facilities, it is likely that the recreational community may support such developments through financial or in-kind contributions.

10. Fees, Charges and Permits

In considering the general issue of recreation in the residual State Forest and plantation estates, there has been some discussion of the topic of “user pays” and “capacity to pay”. QORF understands that some semi-commercial or commercial activities with a

recreational focus, such as car rallies, are charged fees that include a component for infrastructure maintenance such as road repairs. Where there is commercial sponsorship available, such demands may be met by the recreational interest group involved without stress. However, for non-professional, non-commercial recreational activity groups, this trend is alarming as they fear exclusion from the public estate on the basis of “inability to pay” in what effectively might become a commercially competitive marketplace.

In recent years, interpretation of the scope of the definition of “group activities” has been widened greatly beyond what the recreation community considers reasonable. Together with required earlier application times, less flexible permit arrangements and insurance issues associated with those permits have added to both the administrative and financial burdens of ordinary non-commercial recreational groups.

In the development of the financial arrangements for recreation in the residual State Forest and plantation estates, it will be essential to ensure that “recreational succession” amongst forest recreation groups does not occur through economic pressures associated with corporatisation of the forest production activities.

In this regard, it is essential to maintain and ensure transparency and equity through availability of FOI access to administrative information relating to recreation. This would not be possible under the GOC model.

11. Withdrawal of General Recreation Facilities

There is widespread concern throughout the recreational and general communities over the general trend of incremental withdrawal of existing access and closure of established and publicized recreational facilities even under existing management arrangements. Examples include the loss in 2004 of picnic facilities at Marumba Viewing Area on the Kilcoy – Jimna Rd, and the closure of both the Jimna Fire Tower and adjacent picnic facilities of the Jimna Day Use Area (Courier Mail 18.2.2005). General recreation has always been one of the key “multiple use” functions of the forestry estate lands and such losses have not been foreshadowed in government policy. Where such reductions in the

standards of service also impact on tourism potential (even in the form of “day-trippers”) in rural areas, the local communities and local authorities bear a further burden.

These current trends can only give rise to greater levels of concern under other “business orientated” models of management for the State Forests generally, and for the plantations and associated native forests in particular.

12. Outdoor Recreation Demands and Trends

The current and anticipated population growth statistics for coastal Queensland, and for south east Queensland in particular (as summarized in the Draft SEQ Regional Plan), are dramatic. These population growth trends provide a clear indication of the developing and future needs for increased access to sites for outdoor recreational activities (as opposed to nature-based recreational sites).

At the same time, recreation activity trends are changing, or at least, our knowledge of them is changing. Cycling is a relevant example. The Courier Mail recently reported that Australian bicycle sales exceeded new motor vehicle registrations during the last year. Within the recreational cycling community, a dramatic shift to cycling in off-road settings and on mountain bike trails is evident.

In Australia, recognition of these recreational trends by land managers often lags behind reality although established evidence from overseas usually has been available to indicate what developments are most likely to occur. In the case of mountain bike recreation, the “7Stanes” and “Laggan WolfTrax” mountain biking initiatives of the UK Forestry Commission in Scotland indicate how an organization with timber production as one of its key business tasks can also be closely associated with community recreation (eg <http://www.7stanes.gov.uk/> and <http://www.forestry.gov.uk/forestry/INFD-66BK4T>). There are numerous plantation sites in Queensland that hold potential for such joint production and recreational development.

Sometimes, recreation trends and activities can take unexpected directions locally. The recent development of dog sled team activities within the plantation estates across South East Queensland is an outstanding example.

13. Conclusion

On behalf of the QORF membership and their recreation communities, as well as for the wider recreational community, we ask that the Charter Preparation Committee and the Project Team take the broadest view of potential land uses and administration within the forestry land estates of the Queensland Government and that they give clear acknowledgement to the importance of the established and growing interests in recreation on these lands. In addition, QORF asks that the Committee and Team acknowledge that these lands hold a key place in meeting future demands for outdoor recreation. It is essential that, for the plantation estates and associated forests and lands, the business model and administrative arrangements adopted by the Queensland Government do not jeopardize either the existing or future recreational options for the communities who live adjacent to, and through their State own, these lands.