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20 November 2013

Camping and Accommodation Fees
Land Management Policy Division
Department of Environment and Primary Industries
Level 3, 8 Nicholson Street
EAST MELBOURNE VIC 3000

By email: camping.RIS@depi.vic.gov.au

Dear Sir/Madam

NATIONAL PARKS CAMPING AND ACCOMMODATION FEES

Bushwalking Victoria (BWV) thanks you for the opportunity to comment on this proposal.

BWV represents the common interests of over 70 Victorian bushwalking clubs, with in excess of 8,000 members. BWV also aims to proactively represent the interests of all recreational walkers in Victoria as well as walkers visiting from interstate and overseas. One of the common interests of BWV clubs and their members is the conservation of the ecosystems and natural landscapes through which they walk, so that they can enjoy the maximum variety of native flora and fauna and unspoilt scenery and ensure their preservation for future generations. Founded in 1934, BWV has a long history of active interest in conservation, including being one of a group of like-minded organisations pressing for legislation to create a comprehensive system of national parks in Victoria as early as the 1940s.

BWV is disappointed that there was no discussion with stakeholder groups prior to the announcement of these proposals, so that they came as a complete surprise to us, giving BWV and other interested parties no chance of playing a part in formulating the structure and content of the RIS. The surprise with which we received the announcement, and the brevity of the period allowed for comment severely constrains our ability to consult adequately with our clubs and their members. We do not regard this as representing a satisfactory process for public consultation.

Whilst BWV in general supports the proposition that users contribute to the cost of providing camping and other facilities in parks, we do have concerns with some of the proposals included in the RIS, including charging camping fees where no facilities are provided (i.e. dispersed bush camping) and the paucity of per-person fee options: there is, for instance, no per-person option for very high and high categories, so that in these camping classifications individuals and couples who constitute a high proportion of users are forced out or obliged to pay a group fee.

An underlying principle of BWV is the concept of 'freedom to roam', and this is breached by projected fees, which would, for example, have walkers camping overnight in the most remote areas of the Alpine National Park, perhaps bivouacking in sudden emergency situations, paying fees ostensibly designed to provide for upkeep of the amenities. This is an unnecessary drain on the financial resources of bushwalkers, and in relation to established camping areas, the financial impact is, of course, worse.

While we realize that cost recovery is an aspiration, reduced (realistically) below that standard to allow for a level of non-compliance, we note that, with the exception of the "Basic" category, the fees proposed are higher than all the other States/Territories, and these figures include both camping and

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park entry fees so that like is being compared with like. We applaud the fact that the Basic fee is pitched at a relatively low level, but we would have hoped that fees for the Mid, High and Very High categories would have been more comparable with those being charged by interstate counterparts.

The assertion is made that “few states offer equivalent facilities in national parks” (page xvi, RIS). Our members have extensive experience of facilities in other states, several of which offer amenities equal to or better than Victoria’s, and on that score, too, we do not believe that the argument for charging the highest fees in three categories is sustainable.

Many visitors return to the same campsites or lodges year after year, both because they like the place and because they can afford it. It may be financially difficult for students, and families from poorer socio-economic groups, to pay a fee where none has been levied before, or for the somewhat better-off to pay fees which will, in some cases, increase very considerably, e.g.:

- Camping, very high (non-powered) 79%
- Camping, high (non-powered) 61%
- Camping, mid 73%
- Accommodation, huts 47%.

In our view, it would be more sensible, and would incur less user resistance if these charges could be phased in over a reasonable period, consistent with the approach proposed for permit camping (page xvi, RIS).

We are concerned at the classification of some camping areas. An example is the Plantation camping area in the Grampians, (classified as high). Our walkers tell us that Plantation has toilets and a single bush shower, but no drinking water. This scarcely seems to justify such a classification. There are a number of other such examples that could be cited.

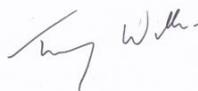
It is unclear to us if and when the Overnight Hiker Permit is applicable in conjunction with the Camping Pass. As read, the Appendix C of the RIS would appear to suggest that for walking in the Alpine National Park and Baw Baw National Park, both the Overnight Hiker Permit and the Camping Pass might be required.

We would request that camping fees be waived for volunteers working with Parks Victoria or Department of Environment and Primary Industry on environmental or track-clearing projects organised by PV/DEPI, in recognition of the economic and user benefits such activities provide.

As a matter of principle, it is our view that the concept of ‘scarcity rents’ (page x, xi, 41, RIS) is inconsistent with the Minister’s Media Release of 23 October 2013 which talks of a “fairer” system for camping in National Parks.

We note the claim that the new price structure is based on cost-recovery, no competitive disadvantage to the private sector, improvements in facilities counteracting consumer resistance, and financial sustainability. These are reasonable concepts, but we do not want our walkers, many of whom are also campers, severely impacted by new fees and fee increases. We accordingly trust that our views will be taken into account in reaching decisions about the final fee structure.

Yours sincerely



Tony Walker
President