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Victorian Environmental Assessment Council
Level 6, 8 Nicholson St
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Dear Sir/Madam,

**BUSHWALKING VICTORIA (BWV) SUBMISSION ON THE VEAC
INVESTIGATION INTO ADDITIONAL PROSPECTING AREAS IN PARKS**

Thank you for the opportunity to provide input to the subject investigation.

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 organizations pressing for legislation to create a comprehensive system of national parks in Victoria as early as the 1940s.

BWV notes that amongst other things VEAC must perforce “take into consideration that the overall objective of the investigation is to increase the number of parks under the National Parks Act [NPA] 1975 where prospecting must be permitted.”

BWV submits that the words “take into consideration” do not make it incumbent upon the VEAC to actually recommend that more parks be added to those already specified under the NPA, and it is BWV’s belief that additional areas for recreational prospecting should not be declared.

That having been said, BWV notes with considerable alarm and concern the restrictive Terms of Reference which have been imposed on this investigation by the State Government,. We would fervently hope, however, that VEAC will exhibit the fierce independence which it has displayed in the past, and make recommendations based on sound environmental principles even if they are contrary to Government intentions in this matter.

While BWV concedes that prospecting, unlike mining or quarrying, is usually fairly innocuous in terms of land damage, we are not convinced that its impacts on other environmental elements, i.e. plants and animals, are equally harmless. The term “prospecting” carries innately the concept of freedom to roam in search of minerals and precious stones, and this is currently only limited by the wording of the governmental permits or gazette notices that define the areas within which this liberty may be exercised.

Bushwalking: At a natural pace in a natural place

Freedom to roam willy-nilly through areas supposedly under environmental protection raises concerns for us, as do the difficulties involved in attempting to police the areas concerned and the practices performed within them.

We would like to see those park areas open to prospecting reduced or rescinded rather than expanded, because a paramount aim of National and State Parks is to protect the native animals and plants within them. We submit that prospecting, with its accompanying concept of freedom to roam through the bush with pans, spades, geological hammers, metal detectors and other equipment and disturbance caused by digging for minerals as antithetical to that objective, no matter where in the park the prospecting area is defined. While some segments of parks may be less sensitive to environmental intrusion than others, it should be borne in mind that parks' boundaries have been drawn up to protect all native plants and animals within them, not to abandon some parts to methodical trampling of endemic habitat, and its denizens to needless trauma.

In particular, we have noted that most National and State Parks contain significant and increasing proportions of rare, endangered and critically-endangered species of native flora and fauna, and we do not think that it is even remotely appropriate, especially in the face of global warming, to now reach decisions having the effect of further encroaching on their environs and pushing them faster towards extinction.

We note that some areas of National Parks and State Parks are already given over to recreational pursuits, and those would be the ones less likely to be ecologically impacted by prospecting. However, we imagine that the general public will not want their picnicking or strolling activities encroached upon by people waving metal detectors or wielding geological hammers, so that prospecting is most likely to be pushed into bushland areas, and that is exactly where we do not want to see it occurring. The effects of its not being located in the bush, on the other hand, could be that visitors would be deterred from going to parks, reducing park revenue and impacting local economies. We would argue that, either way, it shouldn't be happening in National and State Parks.

There are already plenty of Regional Parks and State Forests where this activity may be performed and BWV cannot support extending access for prospecting further into National and State Parks?

We trust that you will genuinely take our comments into account when formulating your report to the Minister.

Yours sincerely,



Chris Towers
President
Bushwalking Victoria