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By website portal: <https://www.haveyoursay.nsw.gov.au/camping/camping-submission>

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Dear Ms Rivers

Submission to NPWS draft consultation paper on camping fees

The Clarence Environment Centre (CEC) has maintained a proud history of environmental advocacy for more than 30 years. The conservation of our region's natural environment, both terrestrial and aquatic, has always been a priority for our members and we believe our national park system is essential for the protection of the state's healthy ecosystems and biodiversity.

To this aim, we have consistently expressed concerns regarding the inadequate funding for the National Parks and Wildlife Service (NPWS) so that agency can effectively manage the 10% of the state that is entrusted to them to manage on behalf of the people of NSW. These protected areas (national parks, regional parks, nature reserves etc.) are referred to as 'national parks' in this submission.

We appreciate the opportunity to provide comment on the draft consultation paper on camping fees, entitled *Improving Camping in New South Wales National Parks Consultation Paper*.

On review, we found the document outlining proposed changes to camping fees so lacking in detail, with no justification for the significant changes it proposes, it is hard to know where to start in making these comments.

For a start, there is unclear how the proposed changes will improve camping experiences in our national parks. The only issue it will solve is no-shows, potentially freeing up bookings for other campers. Other aspects of the camping experience, which are important to visitors (such as maintenance of park facilities and NPWS presence) will not be identified for improvement in the consultation paper.

In summary, the CEC indicates its **complete opposition** to the introduction of standardised site-based camping fees as proposed in the consultation paper.

Our recommendations are:

- better definition of all terms used (e.g. ghost camping) particularly in relation to key policy settings (e.g. high and low seasons)
- more context to the proposed policy changes, with data on national park visitation clearly linked to camping use specific to each of the State's regions, so it is directly relevant to the topic of the consultation paper and the locality of each campground
- a guarantee that camping fees are directly used to benefit the environment of the local parks and increase the presence of NPWS staff in those parks
- removal of additional day use fees for campers
- ceasing the practice of contracting campground management in national parks to private companies more used to managing hotels or caravan parks, with management returned to NPWS control
- stopping the use of market-based competitive neutrality to set camping fees in national parks

- retention of a per-person component, to allow singles to have equitable and affordable access to camping in our national parks
- a review of the functionality of the current booking system to allow the introduction of a culture and policy settings that facilitates easier updates and compliance action on incorrect bookings.

Defining the terms used

One of the difficulties in understanding the consultation paper is the lack of a glossary.

‘Equitable’

Under the heading, *Benefits of proposed changes* (page 4), we question the first dot point which states:

- *consistent and equitable camping fees linked to services facilities and demands*

We dispute this use of the term ‘equitable’. ‘Equitable’ and ‘equal’ are related but distinct terms. ‘Equal’ means treating everyone the same way, while ‘equitable’ means treating people fairly based on their individual needs and circumstances. We believe that the proposed fee structure will establish one rule for the state, and so is clearly aimed at simply providing an ‘equal’ setting without consideration of the circumstances of a local community, the park’s context or an individual camper.

Why should a single traveller have to pay the same amount for a site as a family or several people for the use of a site? According to the Australian Bureau of Statistics (ABS) an average of 28% of the population live in single person households and are often overcharged for all sorts of services. Many of our members camp in national parks, often as individuals and commonly encounter many other individuals who camp on their own. There is nothing equitable in a policy that blatantly discriminates against single park users. A tiered camping fee structure based on per-person pricing is essential to make the use of the national park system equitable for everyone.

‘Ghost bookings’

Dot point 6 under the heading, *Benefits of proposed changes*, states:

- *improved management of persistent campground issues such as ghost bookings (i.e.no shows).*

It is our understanding that ‘ghost bookings’ are NOT no-shows, but rather the placement of camping gear at a site that may have been paid for a short period, and leaving that gear in place to indicate continued occupation of the site (i.e. effectively ‘haunting’ the site), so that the camper to come back and claim the site at a later, more beneficial time. The document does describe that pattern of use as ‘first come, first served’ on page 11 under the heading *Alternative approaches considered*, but fails to identify that this is more widely known as ghost camping.

‘High season’ and ‘Low season’

As a policy document, it is concerning that it is completely unclear how the key policy setting of ‘seasons’ will be determined. Apart from the example that off-peak seasons will differ between coastal parks and Kosciuszko National Park, it is unclear how the ‘seasons’ will be defined for the seasonal price variations. It is presumed the ‘high season’ will include all NSW school holidays and public holidays by default but what regional settings will apply? In all northern parts of the state, the ‘high season’ must include all Queensland school holidays and Queensland public holidays, otherwise we will end up with the situation that residents on school holidays from other states will pay less than NSW residents.

Visitation to NSW national parks

Figure 1 on page 5 shows the trend in visitation to national parks and reserves over the years, but contains no breakdown of this visitation, to indicate whether it was by singles or as part of family or larger groups, or whether the visit involved camping or overnight stays, or was just day trips. Without this level of detail, this figure is irrelevant to improving camping in national parks and the consultation paper’s purpose.

In the overview of NSW national parks on page 5, it is stated in paragraph 4 that: *Visitors take part in a variety of recreational activities... including camping, walking, sightseeing, picnicking, cycling, car and motorcycle touring, fishing, horse riding, canyoning, kayaking and more.* It is disappointing that the consultation paper is unclear that not all of those activities are legal in all national parks, and some (e.g.

horse riding or mountain bike riding) are limited to a very few. It is suggested that the generalised claims in this section should be clarified to reflect the reality.

It is well known that horses are a significant vector of weeds into national parks. In those few parks where camping with horses is permitted, it is unclear from the consultation paper whether and how the camping fee structure will include an extra fee to cover the costs of servicing the holding yards and cleaning up the mess and weeds left by horses.

Camping fees

On page 6, camping is stated to be an affordable way to undertake overnight stays for holidays. Unfortunately, the previous Coalition Government made the NPWS offer camping fees at a rate commensurate with private business enterprises that take advantage of their proximity to national parks as part of the drive towards ‘competitive neutrality’. Needless to say, many of those private business enterprises pay no royalties or fees to reflect their customers’ use of the neighbouring national park.

However, generally, pricing of simple tent-based camping in our parks (as opposed to having access for a caravan site), has remained relatively affordable.

Nevertheless, this will change under the new pricing structure. Using the information in Table 1, the current off-peak fee for camping at our local Tier 6 campground (Woody Head in Bundjalung National Park) will increase from \$35 per night to \$54 per night. This will make camping in a tent in the national park more expensive than the nearby caravan park.

Surely this is highly discriminatory to the users of the national park at the profit of the caravan park, and is at odds with the often-stated claims in the document that the new fees are affordable? It may appear that if a comprehensive analysis of the new fee structure is compared to nearby commercial businesses that provide accommodation, the new fees may be pricing local people out of the national park experience in regional areas.

On page 7, the consultation paper states: “*current campground pricing in New South Wales national parks can be inconsistent and complex. Camping fees differ across New South Wales national parks because fees for each campground have historically been individually set. This has left a legacy of inconsistency and fees do not reflect levels of service and amenity*”.

The CEC understands that the setting of fees locally reflects the cost of servicing the campground. It is highly appropriate to the local context of the national park, the level of use and park visitors’ willingness to pay.

The consultation paper doesn’t show the geographical spread of national parks campgrounds, their current fees and the new proposed applicable site-based camping fee. Why not? As currently written, the information in the consultation ignores the impact of fee changes on local regional communities.

Given that it is well-known in the local community that Woody Head campground runs without making a loss and has, indeed, previously funded weed control programs throughout the Iluka peninsula and biodiversity surveys in other park, there can be no justification for this extraordinary increase in proposed camping fees. The consultation paper does not address this fundamental question of why the current locally determined fee structure is not fit-for-purpose for the management of local parks.

Day use and parking fees

It seems that the authors of the consultation paper have based their writing on the principle that, if you repeat something often enough, it must be correct. As an example, the document mentions the camping fee system dozens of times and refers to the need for ‘equitable’ changes dozens of times, but not once does it mention that campers also incur the cost of day use fees, or the annual/biennial park pass fees which can be substantial in their own right (See Appendix 1 for examples of annual pass fees).

Of the 45 national parks that charge an entry fee, the hourly or daily rate ranges from \$4 to \$29 with the average being \$8 per day at 34 parks depending on the parks location and popularity. Why hasn’t this information been included? Do the revised camping fees include the day pass fees?

We recommend that campers are not charged day-use or parking fees.

Why change is needed

From page 7 of the consultation papers, it appears the authors are relying on data from surveys conducted more than 3 years ago to justify the need for change. This was still during the COVID Pandemic and the time of the previous Coalition Government's incumbency. Surely circumstances have changed since then? The Coalition Government's policy and budgeting settings had a significant impact on NPWS's capacity to effectively manage our national parks during their 12-year tenure. It is likely that the survey results may be highly skewed due to the negative impacts of that Government's decisions had on NPWS, including NPWS staffing levels and morale (due to the annual cut in labour expenses to 'drive productivity'), the programmatic nature of all funding and artificially high hazard reduction targets (to name a few). So, it is logical that these 3-year-old survey results don't necessarily reflect actual and current user experiences.

Further, we wonder what questions were asked that led to the statistics used to justify increased pricing. Before the CEC has any confidence in these survey results, we would have appreciated more details about who responded in the surveys, including the populations centres in which the survey respondents were based. We stress that NSW is more than just Newcastle, Sydney and Wollongong.

One of the dot points that sticks out is dot point 3 on page 7 which states the proposed changes were developed following consideration of: *consultation with partners and industry representatives*. Who are the partners and exactly which 'industry' do the 'industry representatives' represent? We stress that camping in a national park setting is unique to NSW – the only similar experience would be camping in a national park in another state. Were other states park agencies consulted?

Do the consulted 'partners' and 'industry representatives' pay fees or provide funding or other economic support to NPWS? If not, why are they consulted? Surely if you are targeting park users in this user-pays system, then all the players in this arena should pay their fair share of dues. Of key concern, do the consulted 'partners' and 'industry representatives' have a vested interest in the outcomes of the camping fee consultation paper? How was that conflict of interest taken into account when considering their views?

Booking system

As we understand the current system for booking, the first contact point for anyone booking a site goes through Digi REZ to Service NSW. There are many flaws and problems with the current system and, it seems, NPWS offices are still being contacted to ask basic information about campsites (e.g. size).

We understand both Digi REZ and Service NSW charge a fee for every booking. We question why there has been a decision to remove any booking fees for those Tier 1 campsites at which bookings are required.

As in other systems that rely on good internet coverage, the booking system fails where mobile internet coverage is poor. It is difficult to use the app to adjust and correct bookings when the number of people in a camping group change. This change used to be a service offered at the Woody Head kiosk but which can no longer be carried out on behalf of campers.

Perceived lack of management presence and maintenance

It would seem that most campers would see their camping experience improved if there were greater NPWS presence in campgrounds.

This requires a reversal in the long-term decline in staff numbers to reflect the size and land-management responsibilities now given to NPWS as a legislated obligation. Instead, we've seen a progressive decline in ranger numbers and, in our region, the only official campground presence is by contractors.

Similarly, if the maintenance of campgrounds, facilities and associated infrastructure is an important service desired by campers, it must be similarly resourced. There is nothing in the document that supports those needs.

Politically, as the Labor Government has NOT undone all the negative impacts of the Coalition's disgraceful attacks on NPWS's ability to carry out its legislated responsibilities, the CEC is disturbed by

the fact that the consultation paper fails to identify the need for more NPWS staff, to commit to move away from contracted management of campgrounds, and to guarantee that camping fees will be used to benefit the local park and campground facilities.

Based on current staffing levels it is our belief that the NPWS does not have the human resource capabilities to manage and implement the needs of the visitor numbers and the impacts and resource requirements to mitigate their impacts. A principal objective of improving the camping fee structure should be to increase the staff numbers at the NPWS commensurate with their significant roles and responsibilities.

In conclusion, the CEC recommends that the current per-person pricing structure, that is set and determined locally, does not change

Yours sincerely

Phil Redpath,
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Vice President

Appendix 1. Annual/biennial park pass costs to avoid day-use fees

All Parks Pass For all fee-collecting parks in NSW , including Kosciuszko National Park.	1-year pass \$190 <i>seniors \$152*</i>	2-year pass \$335 <i>seniors \$268*</i>
Multi Park Pass For all fee-collecting parks in NSW , except Kosciuszko National Park.	1-year pass \$65 <i>seniors \$50*</i>	2-year pass \$115 <i>seniors \$90*</i>
Country Parks Pass For all parks in Country NSW, except Kosciuszko National Park. See the list of parks this pass applies to.	1-year pass \$45 <i>seniors \$35*</i>	2-year pass \$75 <i>seniors \$60*</i>
Single Park Pass For any 1 designated park in Country NSW, except Kosciuszko National Park. See the list of parks this pass applies to.	1-year pass \$22 <i>seniors \$17*</i>	2-year pass \$40 <i>seniors \$30*</i>