



Policy analysis

Conservation threats from tourism land grabs and greenwash

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ABSTRACT

We report a new threat to conservation, namely land grabs by large tourism developers inside public protected areas. Locally, these tourism land grabs damage national parks through building footprints and access corridors, bringing habitat fragmentation, noise, light, roadkill, fire risk, and invasive plant and animal species and pathogens. They also create negative impacts on social equity and regional economies. The global tourism industry now perceives private development in public national parks as a mechanism to profit from land speculation, rather than merely monopoly provision of visitor services. Investment funds now use tourism, often with socialwashing components, as a political lever for land grabs. International “nature positive” marketing by tourism industry associations and multilateral tourism advocacy organisations is greenwash: it lacks substance, and aims to coopt conservation organisations.

1. Introduction

Most public protected areas worldwide are open for individual recreational visitation. Visits are subject to park regulations on fees, times, seasons, locations, group sizes, activities, equipment, and behaviours (Leung et al., 2018). Some parks also grant operating permits for commercial tourism enterprises. Most of these commercial tourism products are small-scale guided activities, similar to individual visitor groups, and obeying the same regulations. A few are larger-scale and offer activities under different conditions than those available to individual visitors. Fewer still operate fixed-site accommodation and infrastructure owned by the parks agency, under concession agreements. All of these are well studied (Leung et al., 2018).

Fewest of all, with <200 individual cases worldwide, have been granted rights to develop privately owned and operated facilities inside public protected areas (Buckley, 2018). These have not always proved successful. Public parks agencies have incurred substantial costs, including: provision of access and utilities, litigation over development rights, buy-back of licences granted at zero initial price, clean-up of developments that were abandoned, and compensation claims for business losses, property damage, and personal injury and death, in the event of natural disasters (Buckley, 2018). Compensation payouts have reached up to a quarter of a billion dollars per event. There are also social costs, from exclusion of individual visitors; and environmental

costs, from footprints and impacts of private developments (Buckley and Chauvenet, 2022).

By far the majority of fixed-site private nature tourism developments worldwide are on private or communally owned lands, or on public lands allocated for other uses. These include forestry, e.g. for ski areas in many countries; or wildlife management, as for game lodges in many African nations. Similarly, nearly all private tourism accommodation used by visitors to public protected areas is outside those areas themselves, in adjacent gateway sites. In newly industrialised nations such as India and China, with heavily visited public lands, former private developments have been removed from national parks and forest reserves. In countries such as the USA, large-scale tourism facilities inside heavily-visited national parks are owned by the national parks agency, and operated by private hospitality companies under very tightly controlled short-term concession agreements.

Nearly all the private fixed-site tourism facilities that do exist inside public protected areas are either historical or legacy developments that precede park establishment, enclaves of private land geographically inside but legally outside park boundaries, or part of land tenure changes such as gifts of private lands to the public conservation estate, or Indigenous land rights claims of various types. There are very few indeed where national parks agencies have deliberately invited new private developments, generally as an attempt to raise revenue; and these have not generated the revenue expected, and have remained as

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one-off experiments, not repeated. These various arrangements are summarised in Table 1. The last of these is a new category, analysed here.

2. New tourism development threat

Our focus here is on the last-listed category in Table 1, new private tourism accommodation and fixed-site facilities inside public protected areas, as a form of land grab. This is the latest and largest-scale step in decades of manoeuvring by tourism development entrepreneurs and government apologists, to gain control over the public conservation estate in a number of developed nations. These tourism land grabs inside national parks (Sauls and Devine, 2023; Fabro, 2024) are occurring either through political nepotism (Buckley, 2018), or in specific jurisdictions where tourism has political power to override conservation.

The new land grabs are achieved through covert political manoeuvres, deliberately hidden from the public by both proponents and regulators, until too far under way to be reversible: “stealth privatisation” (Buckley and Chauvenet, 2022). As in many industry sectors, a variety of tricks and sleight-of-hand moves are used to avoid or bypass legislation that nominally requires open public environmental impact assessment. These same tricks have long been used for large-scale tourism and residential developments on other land tenures (Warnken and Buckley, 1995), so they are already familiar to tourism development proponents. One such mechanism, for example, is that a government agency may act as the proponent, using special exemptions in EIA legislation, and then sell the development to a preselected private operator at a peppercorn price.

Such exemptions may apply for government proponents in general, or for designated “special projects.” In at least one case, a proposed private tourist cableway and associated facilities were proposed as “transport infrastructure.” Government agencies may amend national parks legislation, with carefully worded clauses overriding conservation purposes (Ogilvie, 2014). They may claim that clearance for new road and utility corridors is designed for disability access, when in reality it may be used only to shuttle staff and supplies to private tourism accommodation. They may claim that new tourism projects are to provide employment for local Indigenous communities, even when the leaders and elders of those communities publicly reject such claims. These approaches are known as socialwashing (Troje and Gluch, 2020; Booyens et al., 2022). All these approaches are covert, and difficult even for the best-informed conservation NGOs to recognise and resist, until too late.

3. Australian case studies

In Australia, most national parks are under subsidiary-state rather

Table 1
Categories of nature tourism in protected areas and other land tenures.

Scale ^a	Freq	Arrangements
S	W	Tourists travel to parks and enter as individual visitors
S	M	Educational or volunteer groups carry out activities under licence
S	W	Commercially run mobile tours under usual visitor regulations
M	L	Commercial enterprises run exclusive operations under permit
M-L	M	Commercial enterprises operate park facilities under concession
S-L	W	Private nature tourism accommodation on non-park lands
S-L	W	Private tourism accommodation adjacent to public parks, in gateways
S-L	L	Private tourism facilities in public parks: legacy, enclave, tenure swap
S	L	Private lodges as major funders of national parks in developing nations
M-L	V ^b	New private tourism accommodation as land grab in wealthy countries

^a Scale = Small, Medium, Large; Frequency = Widespread, Moderate, Localised, Very low. Scale and frequency are approximations.

^b New category, analysed here.

than federal land tenures. In Queensland, a former government amended nature conservation laws to allow developments inside national parks, including private tourism accommodation (Queensland Government, 2013; Ogilvie, 2014). The current Queensland government used this to promote private tourism developments in national parks, under the marketing title of “Ecotourism Trails.” This title has three particular functions. First, it reflects the language of the amended Act, which provides for undefined “ecotourism.” Second, the term “trails” aims for social licence by sounding like walking tracks, though the actual developments are private accommodation on existing public tracks. Third, “trails” are also aimed to attract tourists in competition with other Australian States, which have heavily-advertised named multi-day hikes in national parks. Most of those, however, are self-guided, self-supported backpacking hikes, also used for guided hikes by mobile tour operators.

Five “Ecotourism Trail” developments were proposed in Queensland. One went ahead, three are under way, and one is halted, at least currently (Queensland Government, 2024). In one case, the owners of a hotel next to a national park were granted long-term rights to two prime exclusive-access areas inside the park, with approvals and subsidies for new lodges. The owners then sold 60 % of their assets to a US\$2 billion wealth management fund, for US\$93 million (Hogan, 2022). In another case, a low-priced national parks campground accessible to all was redeveloped by a private resort in an enclave, and is now too expensive for family use. For the resort, this removed competition. In a third case, the Queensland government approved a tiny-house construction company to build and run 5 new lodges inside a national park. That company then sold a major stake to an international tour operator with annual revenue >\$0.5 billion, whose CEO is an Executive Committee member of WTTC, the World Travel and Tourism Council (Coulton, 2022).

These private developments create negative impacts on conservation through excision and degradation of ecosystems of high conservation value, and construction of access corridors bringing noise, light, fire, roadkill, feral animals, weeds, and pathogens (Queensland Government, 2013; Ogilvie, 2014; Buckley et al., 2022). They also impose social costs on independent recreational visitors, and financial costs on parks agencies and taxpayers. These examples show that private tourism enterprises operating in public protected areas no longer derive their profits only through a monopoly on selling visitor services, but also, and more significantly, through increased value of rights over prime land. Property entrepreneurs in developed nations now see tourism as a way to gain control over national-park land with high amenity value and taxpayer-funded infrastructure and marketing: that is, land grabs.

4. International political lobbying

The world’s largest tourism enterprises are airlines, cruise ship companies, and hotel, resort, casino, and resort-residential chains. Until recently, these companies saw national parks only as part of the image and attraction of destination countries, and park visits as a minor single-day activity available to holiday-makers staying in nearby metropolitan accommodation. The categories in Table 1, excluding the last category, were of limited interest to them. Pressure for more private tourism in public parks was largely from small-business tourism industry associations and localised single-site development proponents, which were less powerful politically than national government land management portfolios such as national parks agencies. During 2022 to 2024, however, this has changed, owing to perceived opportunities for land grabs.

At the 15th Conference of the Parties to the Convention on Biological Diversity in Montréal in December 2022, the World Travel and Tourism Council, WTTC, lodged a formal industry submission. WTTC is the world’s largest private-sector tourism industry association, 200 companies comprising a third of the tourism sector by revenue. Their submission claimed that tourism would support conservation. Its actual wording, however, simply demanded rights for private tourism developments inside public protected areas, with no mention of any payment or other compensation (Buckley et al., 2023a). This is very

different from the situation in countries such as Botswana or the Seychelles, where payments from tourism and safari operators contribute over 80 % of the parks agencies' annual budgets.

In May 2024, WTTC and the multilateral (intergovernmental) World Tourism Organisation, UNWTO, published a report claiming that the US \$11 trillion p.a. tourism sector is "nature positive" (WTTC et al., 2024), which it is definitely not (Buckley, 2018). This is a follow-up from an earlier report (WTTC, 2022). The 2024 report lists 35 cases, summarised in Table 2. Only 5 relate to biodiversity, and they are run by NGO's. Few of the companies listed are WTTC members. Many cases are merely plans. The largest defined outcome is planting 273 seedlings. Actual achievements are thus negligible. The report is greenwash. Its real function is revealed through parallel but covert political manoeuvres. WTTC is seeking a publicly declared political partnership with the International Union for Conservation of Nature, IUCN, whose members include government agencies in >160 countries, and >16,000 conservation experts. WTTC's report authors are lobbying the IUCN World Commission on Protected Areas Tourism & Protected Areas Strategic Group, and its Biodiversity Working Group. IUCN should reject these attempts at cooption.

5. Conservation tourism cases

There are some tourism enterprises that do make net positive contributions to conservation of threatened species and their habitats (Buckley, 2010; Buckley et al., 2016). They are mainly in developing

Table 2
Case studies, WTTC "Nature Positive Travel & Tourism In Action".

Region	Activities	Type	Size	Time
Caribbean	Fisheries monitoring	ITC	NR	OG
Mediterranean	Marine eDNA sampling	ITC	NR	OG
Australia	Animal welfare plan	SME	VS	PO
Aruba	12 ha kids tree planting	SME	VS	BF
Malaysia	Turtle rescue, local NGO	SME	VS	OG
Worldwide	Various projects	ITC	VS	BF
Spain, Turkey	Consulting company	SME	VS	OG
Maldives	Typical island recycling	ITC	VS	OG
UK	Follow dolphin regulations	SME	SL	OG
Cambodia	Tented camp, 16 rangers	NGO	VS	OG
Australia	National restoration fund	ITC	NR	OG
UK	Cetacean conservation	NGO	GW	OG
Finland	Weed removal by guests	SME	VS	OG
Italy	Urban community gardens	NGO	VS	OG
Maldives	Sponsor-funded reefscape	ITC	VS	OG
Various	Collect water samples	ITC	SL	OG
Spain	Marine monitoring cameras	ITC	VS	PO
UK	Animal welfare workshop	SME	VS	BF
UK	Staff lunchtime lectures	ITC	VS	BF
UK	Avoid modern slavery	SME	SL	BF
Dominican R	Food-waste training	ITC	VS	BF
Greece	Destination marketing	ITC	SL	BF
Vietnam	Don't eat dogs or cats	NGO	NR	BF
Worldwide	Animal welfare policy	ITC	GW	PO
New Zealand	Tourism industry plan	NGA	NR	PO
Jordan	National biodiversity plan	NGA	NR	PO
Peru	Coastal tourism manuals	NGA	NR	PO
New Zealand	Tourism action plans	NGA	NR	PO
Sierra Leone	Proposed ecotourism circuit	NGA	NR	PO
Rep. Congo	Donor-funded tourism plan	NGA	NR	PO
Malaysia	Volunteer tree planting	NGO	VS	OG
Costa Rica	Stop animal selfies campaign	NGO	NR	BF
Mexico	Various NGO donor projects	NGO	SL	BF
Romania	\$1.50 pp. tax for motocross	SME	VS	OG
Egypt	Ecocertification	NGA	NR	OG

Order of listing as in WTTC report.² **Type:** SME, small or medium enterprise; ITC, international tourism corporation; NGA, national government agency; NGO, non-government organisation. **Size:** VS, very small; SL, small or local; NR, national or regional; GW, global or worldwide. **Time:** OG, ongoing; BF, brief and finished; PO, plan only, never operational. Information from WTTC et al. (2024), supplemented by online searches for each case study.

nations in Africa (Buckley et al., 2023a), and to a smaller degree in Asia and Latin America (Buckley and Cooper, 2019). Some operate private conservation reserves, and others lease land for temporary lodges in national parks or communally owned lands. They may provide increased habitat area, anti-poaching measures, guards and rangers, veterinary services, captive breeding programs, translocations, and aerial and on-ground monitoring. These are all costly. The companies concerned are primarily conservation enterprises, that fund their operations at least partly through tourism. They may also run donation programs. They are not members of WTTC, though some are members of upmarket accommodation associations, and they frequently win tourism awards. They could justifiably claim to be nature positive, but none are included in the "Nature Positive" report (WTTC et al., 2024). The large-scale land grabs in developed nations, and WTTC lobbying efforts, pretend to copy these conservation tourism enterprises, but in reality do the opposite.

6. Policy considerations: Rare nature positive, widespread greenwash & land grabs

As outlined above, though nature positive tourism does exist, it is rare and rather small-scale. Much more commonly, tourism has major net negative impacts on conservation. The latest threat is through land grabs inside public protected areas, by large corporations in developed nations. These companies choose opportunities where land is valuable and appreciating, land titles are tradeable and bankable, and government tourism subsidies can be substantial. These land grabs are severely nature negative. To provide political support for land grabs, there are lobbying campaigns by government tourism portfolios and tourism industry associations, that create and publish greenwash and socialwash reports, and mass and social media materials.

This is a new phase of longstanding political efforts by the tourism sector, to gain control over the global conservation estate. It differs from earlier phases in involving much larger, wealthier, and more powerful corporations than previously, not necessarily with tourism experience; and by adopting more sophisticated misinformation campaigns, comparable to those now used to influence elections and other politically coloured policy decisions, social and environmental as well as economic. It is comparable to international anti-environmental lobbying efforts within other industry sectors (Hale, 2020; Elsässer et al., 2022). From a conservation perspective, it is another attack on the ever-declining and degrading protected area estate worldwide (Dinerstein et al., 2024; Pereira et al., 2024; Senior et al., 2024), critically important for survival and wellbeing of humans as well as other species. Land grabs in protected areas by other industry sectors such as mining, forestry and farming are well recognised (Dinica, 2022; Neef et al., 2023). We now have to add tourism to that threat.

Table 3
Political mechanisms linking parks and tourism in different economic blocs.

Mechanism	Developing	Developed
Private conservation reserves funded by tourism	Successful, many	Rare and small
Tourism funding contribution to parks agencies	Significant +ve	Net negative
Local jobs prevent poaching, livestock invasions	Commonplace	Not relevant
Local jobs prevent logging, mining, fishing	Not enough power	Not enough power
Conservation advocates visit parks	Frequently	Frequently
Park visitors and tourists gain wellbeing	Significant value	Significant value
Park tourists become conservation advocates	Occasionally	Negligible
Tourism industry operates parks concessions	Widespread	Some countries
Tourism industry funds conservation	Many case studies	No, reverse only
Tourism lobbies for development in parks	Existing systems	New land grabs
Tourism industry lobbies for more parks	Sometimes	Rare, ineffective

Interactions between parks and tourism differ greatly between developed and developing nations (Table 3). In the latter, parks agencies have limited funding for visitor infrastructure. International tourists rely on commercial tourism enterprises for safety, logistics, language, and local knowledge. There are tourism companies that have established track records of successful conservation on other land tenures. Parks agencies can rely on those operators to minimize impacts and contribute to conservation, and charge them substantial fees which support agency budgets. Tourism operations also provide employment for local communities, which relieves pressure for poaching and livestock invasions. In highly impoverished nations, private organisations such as [African Parks \(2024\)](#) take over conservation management of entire parks, with funds from tourism and international donors.

These approaches are not universally successful. For example, wealthy and politically connected individuals may still invade parks with livestock herds or logging operations. There are also tourism operators that operate on an extractive model, abandoning sites and moving to others; and concerns have been expressed over ex-colonial political power (Thakholi et al., 2024). The basic nature and wildlife tourism business model, however, yields sufficient funds to provide net benefits for conservation, if it is managed with that aim in mind. There is also a fundraising opportunity from a few wealthy clients who may donate to community or conservation projects, but that is not the primary business model.

In developed nations, the economic, social and environmental contexts are very different. Parks have government budgets and legal protection. Most visitors are domestic, and use publicly funded infrastructure. Most tourism enterprises are simply guided groups of visitors, and most private fixed-site tourism accommodation and facilities are outside park boundaries. Parks agencies have legal, social and political powers to regulate independent visitors and small-scale tourism effectively. This includes permit and concession agreements. Parks agencies may charge various fees, but these are limited by concerns over social equity of access, and do not cover the full costs of recreation management, let alone conservation management. The principal environmental and economic contribution is through conservation of biodiversity and provision of passive ecosystem services, the cardinal purpose of parks. Parks also make large social and economic contributions through improved health and wellbeing of visitors. The financial value of these mental health contributions is US\$5.1 trillion annually worldwide (Buckley et al., 2023b), an order of magnitude greater than that of parks visitor expenditure, including travel costs and commercial tourism.

The current land-grab attempts by the large scale tourism development sector and its investors are set within this political context. Tourism development lobbyists pretend that business models in developing nations can also be applied in developed nations, but this is merely a political manoeuvre to gain long-term property development rights. In Australian cases, for example, leases are far longer than in African nations, and with far less stringent environmental conditions. Tourism property developers claim that they will generate funds for conservation, create new conservation advocates, and support political lobbying to extend the conservation estate, but these are all greenwash lacking empirical evidence. If these were really their aims, they would create private conservation reserves funded by tourism.

Tourist industry lobbyists also claim that they will provide access for people with disabilities, and employment for Indigenous people, but these are socialwashing. Many national parks do have publicly-funded wheelchair access routes, up to 1 km in length, smooth surfaced, low gradient, and <1 m wide. Access routes for private parks lodges are very different. They are usually graded dirt roads, ~5 m wide including berms, with drains and overtake zones and widened corners, intended for supply trucks rather than disability access vehicles. Similarly, while some Indigenous individuals may be interested to use their skills as park rangers, few want to work in the hospitality sector. It appears that the tourism property development industry uses Indigenous peoples as

catspaws, lobbying parks agencies to grant them special development rights which would not be available directly to private interests, but which those same private interests can then lease from Indigenous rights holders in return for a small proportion of profits.

7. Policy conclusions

Both conservation and tourism policies are made and implemented at multiple interconnected levels, from local to international. Governments in different countries, jurisdictions, and economic blocs have widely differing internal power dynamics, with interactions between portfolios depending on partisan interests and ideologies. There are two principal policy conclusions from our analysis here, which apply at all scales. First, the principal purpose, most important function for human and planetary survival, and cardinal legal principle for protected areas is that they are there to conserve biological diversity and ecosystem services, not as a public subsidy for the commercial tourism industry. In any case of any uncertainty, the cardinal principle should take priority. This means that commercial tourism interests should very rarely be granted any form of property rights in national parks in developed countries. That is an important policy principle at all scales.

The second, a corollary of the first, is that lobbying for land grabs inside public protected areas, by tourism advocates in developed nations and internationally, does not deserve policy support, because it is largely greenwashing and socialwashing. Examples from developing nations do not translate to developed nations (Table 3). There are some tourism enterprises in developing nations that do make net contributions to conservation, but this is by no means universal. Most operations are on non-park land tenures; parks agencies deal only with companies that have established track records in conservation; parks agencies maintain tight legal control, with short leases and full removability of any facilities; and tourism lease fees are large enough to be the main funding source for parks agency budgets. Tourism land-grab manoeuvres in developed nations do not meet any of those criteria, and should be rejected.

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Ralf C. Buckley: Writing – review & editing, Writing – original draft, Investigation, Conceptualization. **Sonya Underdahl:** Writing – review & editing, Writing – original draft, Investigation, Conceptualization. **Aila Keto:** Writing – review & editing, Writing – original draft, Investigation, Conceptualization. **Alienor L.M. Chauvenet:** Writing – review & editing, Writing – original draft, Investigation, Conceptualization.

Declaration of competing interest

No conflicts of interest.

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