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Representation: Draft TWWHA Management Plan
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BirdLife Tasmania submission to Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014

Summary

- Birds serve as highly sensitive bio-indicators to the state of health of the environment, including a fundamental role in providing feedback on the efficacy of management regime(s),
- The TW WHA overlaps with eight Important Bird and Biodiversity Areas (IBAs), identified using internationally-recognised criteria, supporting internationally-significant populations of endemic and threatened species, and of colonial seabirds,
- The internationally-significant IBA values are in addition to previously identified Outstanding Universal Values of the TW WHA,
- The TW WHA supports the entire global population of Orange-bellied Parrots, a Critically Endangered species with fewer than 70 individuals remaining in the wild,
- The Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 fails to recognise the internationally-significant bird values identified by BirdLife Australia's Important Bird Areas (IBAs) project,
- Proposed changes to management regime of TW WHA introduces new threats to these species, resulting in greater spectrum of cumulative impacts and increasing the risk of extinction of some Endangered species, fragmentation of habitats, greater disturbance,
- Failure to consider cumulative impacts and synergies amongst and between threats and pressures will result in greater likelihood of extinctions of Endangered species in the TW WHA.

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Conclusions

- BirdLife Tasmania believes the Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 fails to protect the internationally-significant populations of Endemic and Endangered bird species that rely on the TW WHA,
- BirdLife Tasmania believes the Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 will increase the pressures and threats to the internationally-significant populations of Endemic and Endangered bird species that rely on the TW WHA,
- BirdLife Tasmania believes the Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 in its current form is manifestly deficient in protecting internationally-significant bird and other natural values, and fails to maintain the ecological integrity of the TW WHA,
- BirdLife Tasmania believes the Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 in its current form must be rejected and must be re-written to comply with current best practice to WHA management as per IUCN requirements, objectives and guidelines, and
- BirdLife Tasmania requests the Tasmanian Planning Commission conduct public hearings for stakeholders to raise their extensive concerns to the Tasmanian Government as a matter of the highest priority.



Introduction

BirdLife Australia is the nation's oldest conservation organisation, and was founded in 1901, the year of Federation. The organisation is recognised around the country and around the world for its strong voice and highly developed and professional expertise in the conservation of Australia's birds and their habitats.

BirdLife International is the world's largest nature conservation partnership, with 120 partner organisations worldwide, including BirdLife Australia. BirdLife is widely recognised as the world leader in bird conservation. Globally, the partnership has more than 13 million members and supporters, of which more than 75,000 are present in Australia.

BirdLife Tasmania is the State Branch for BirdLife Australia. With more than 450 members, BirdLife Tasmania has one of the highest *per-capita* Branch memberships in Australia, clearly demonstrating a widespread community interest in Tasmania's birds and their conservation and management.

BirdLife Tasmania has a significant profile with the Tasmanian community, with strong links with all three NRM agencies in the State and with DPIPWE, many Local Government Councils and numerous community land and coastal 'care' groups around the state.

BirdLife Tasmania is regularly engaged to provide data, advice and expertise on Tasmania's birds and the threats faced by them. We provide advice and data to inform Management Plans, Recovery Plans and Strategies etc dealing with Tasmanian birds and their habitats; we have a long history of submissions on Reserve Estate Management Plan drafts in Tasmania.

BirdLife Tasmania strongly supports evidence-based management and the application of the Precautionary Principle to ensure the highest chance for the conservation of Tasmania's birds and their habitats for future generations.

Birds as bio-indicators

The paradigm of canaries providing an early warning signal to miners of the presence of toxic gases and of an unsafe environment is equally applicable to Tasmania, Australia and the rest of the planet today.

Since the 1960s, when the environmental impacts of intensive DDT use around the world were manifested in bird populations decreasing rapidly due to egg-shell thinning to the current day, birds have been and continue to be recognised as excellent indicators of ecosystem health around the world. As



top-order predators in nature, bird populations reflect the integrity of ecological food webs and ecosystem processes of their environments.

Conversely, the increasing frequency of threatened species (ie those listed as *Vulnerable*, *Endangered* and *Critically Endangered* by the IUCN) is indicative of the presence and persistence of threatening processes and/or disturbance to natural processes, arising almost exclusively from the impacts of human activities.

Each conservation category is associated with an increased risk of extinction of the species in the wild. Governments, NGOs and communities around the world, including BirdLife Australia, are working to prevent such extinctions.

With one in eight of the World's 10,000 bird species (12%) now globally threatened, birds are providing a clear, compelling and unequivocal indication of the critical need to protect remaining natural habitats globally to minimise the possibilities of the loss to extinction of these species. Of greatest priority for conservation are intact ecosystems that remain unmodified and undisturbed by human activities.

In Tasmania, more than 10% of the State's bird species are formally listed as Threatened, with more than 30 bird species recognised by the Tasmanian Government as *Rare*, *Vulnerable* or *Endangered*.

BirdLife Tasmania believes that additional species of Tasmanian birds meet the criteria to be listed as Threatened, and that the percentage of species meeting the criteria for listing approaches or exceeds 20%, but the lack of critical scientifically credible data currently available prevents this.

As highly visible and highly audible components of the environment and ecosystems, birds also provide robust indicators or proxies to the biodiversity of an area.

This significant role of bio-indicator of environmental health by birds is recognised by their inclusion in numerous State of the Environment Reports around the World. National reports, regional and continental syntheses draw heavily on bird population numbers, trends and distributions to infer status and trends in other species for which data are lacking, and to provide an insight into the efficacy of management and the integrity (or otherwise) of natural environments.

Birds are used to assess the efficacy of management plans and recovery strategies for species and habitats. Monitoring data are collated to provide indicators at national, regional and global scales, including Ramsar



Convention and the Convention on Biological Diversity. Birds provide highly visible and accurate snapshots of local, national and global ecosystem health.

Important Bird and Biodiversity Areas (IBAs)

An international program to identify areas of importance to birds was initiated by BirdLife International using standard, internationally-agreed and internationally-applied criteria for all area assessments. The Important Bird and Biodiversity Area (IBA) Programme identifies, monitors and protects a global network of IBAs for the conservation of the world's birds and other wildlife.

Although bird faunas define each IBA in the network, the conservation and appropriate management of these areas will ensure the survival of a high number of other animal and plant species. IBAs are the sites critical to ensure the survival of viable populations of most of the world's bird species. IBAs also support a large and representative proportion of other biodiversity, providing a holistic approach to conservation rather than the species-based approach that is more often used.

IBAs overlap with Ramsar sites and their criteria for selection, but the IBA selection criteria include all species of birds not just waterbirds. Briefly, the criteria used to identify IBAs are:

1. **Globally threatened species (where the site is known or thought regularly to hold significant numbers of a globally threatened species, or other species of global conservation concern),**
2. **Restricted-range species (where the site is known or thought to hold a significant component of a group of species whose breeding distributions are constrained, such as endemic species),**
3. **Biome-restricted species (where the site is known or thought to hold a significant component of the group of species whose distributions are largely or wholly confined to one biome), and**
4. **Congregatory species (where the site supports >1% or >20,000 individuals of congregatory species of waterbirds, seabirds or terrestrial species).**

To date, approximately 12,000 IBAs have been identified around the World, and they represent the largest global network of important sites for biodiversity. Full details and descriptions are available at <http://www.birdlife.org/datazone/info/ibacritglob>



The identification of Australian IBAs was undertaken by BirdLife Australia and all state branches, applying the international criteria to existing survey data. Full details of the project are available at <http://birdlife.org.au/projects/important-bird-areas>

As of 2014, 314 IBAs have been identified in Australia, of which 40 are located in Tasmania (Figure 1). Eight of these IBAs overlap the TW WHA (Figure 2) comprising four terrestrial and coastal IBAs and four maritime island IBAs.

The four terrestrial and coastal IBAs are Cradle Mountain, Melaleuca to Birchs Inlet, North-west Tasmanian Coast and South-east Tasmania, and the four maritime island IBAs are Maatsuyker Island Group, Mewstone, Pedra Branca and Port Davey Islands. Details of the Australian program were published by Dutson et al. (2009) available at <http://birdlife.org.au/documents/OTHPUB-IBA-suppl.pdf>

Tasmania's endemic and endangered bird species in the TW WHA and Tasmanian IBAs

The four terrestrial and coastal IBAs that overlap the TW WHA (Cradle Mountain, Melaleuca to Birchs Inlet, North-west Tasmanian Coast and South-east Tasmania) support breeding populations of 11 of the 12 species of Tasmanian endemic birds (Table 1).

The South-east Tasmania IBA overlaps the TW WHA in the far southeast, close to Southport Lagoon and Recherche Bay supports the global population of Forty-spotted Pardalotes, but they are not present in the TW WHA.

The Melaleuca to Birchs Inlet and North-west Tasmanian Coast IBAs support the entire global population of the Critically Endangered Orange-bellied Parrot, with fewer than 70 individuals remaining in the wild (Table 2).

The Cradle Mountain, Melaleuca to Birchs Inlet, North-west Tasmanian coast and South-east Tasmania IBAs all support breeding populations of six Endangered Tasmanian bird species (Orange-bellied Parrot, Swift Parrot, Grey Goshawk, Wedge-tailed Eagle, Azure Kingfisher and Masked Owl). These species are present in numbers that are internationally significant (Table 2).

While not currently recognised in Australian or State legislations, the Convention on Biological Diversity Aichi Target 11 directs us to ensure that, *“By 2020 at least 17 per cent of terrestrial and inland water, and 10 per cent of*



coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem services, are conserved through effectively and equitably managed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures”

		Terrestrial and coastal IBAs			
		Cradle Mountain	Melaleuca to Birchs Inlet	North-west Tasmanian Coast	South-east Tasmania
Endemic Species	Tasmanian Native Hen	X		X	X
	Green Rosella	X	X	X	X
	Dusky Robin	X	X	X	X
	Tasmanian Thornbill	X	X	X	X
	Scrubtit	X	X	X	X
	Tasmanian Scrubwren	X	X	X	X
	Yellow Wattlebird	X			X
	Yellow-throated Honeyeater	X	X	X	X
	Black-headed Honeyeater	X	X	X	X
	Strong-billed Honeyeater	X	X	X	X
	Black Currawong	X	X	X	X
	Forty-spotted Pardalote				X

Table 1. Endemic species of Tasmanian birds in the four terrestrial and coastal IBAs, based on BirdLife Australia data, available from <http://www.birdata.com.au/iba.vm>

IBAs are Key Biodiversity Areas of international significance, and the incorporation and inclusion of these internationally-assessed and internationally-recognised IBAs and their values that overlap the TW WHA is critical for the future management regime and conservation effort of the TW WHA.

Because the same methods used globally to identify IBAs elsewhere on the planet were used by BirdLife Australia, the IBAs have identified internationally-significant areas of conservation significance, placing the onus on the Tasmanian and Federal Governments to recognise these internationally-significant values and incorporating appropriate management regimes in the TW WHA Management Plan to ensure their continued persistence into the future.



Threatened Species	Conservation Status	Terrestrial and coastal IBAs			
		Cradle Mountain	Melaleuca to Birchs Inlet	North-west Tasmanian Coast	South-east Tasmania
Orange-bellied Parrot**	Endangered		X **	X **	
Swift Parrot					X
Grey Goshawk		X	X	X	X
Wedge-tailed Eagle		X	X	X	X
Azure Kingfisher		X	X	X	X
Masked Owl			X	X	X

Table 2. Presence of Endangered Tasmanian birds from the four terrestrial and coastal IBAs, based on BirdLife Australia data, available from <http://www.birddata.com.au/iba.vm>

** It is critical to note that the entire global population of Orange-bellied Parrots in the wild is found in the Melaleuca to Birchs Inlet and North-west Tasmanian Coast IBAs during their breeding and migration.

** Further, the Orange-bellied Parrot is listed as *Critically Endangered* by the Australian Government and the IUCN.

BirdLife Tasmania believes that while their designation currently has no legal basis, there exists a strong scientific basis to justify conservation action in the conservation in Australia of all IBAs identified, including those that overlap with the TW WHA.

Incorporation of IBAs in the Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 will result in the conservation of critical habitats, rather than species-specific approach more frequently utilised, and will permit a management regime that is proactive, rather than reactive.

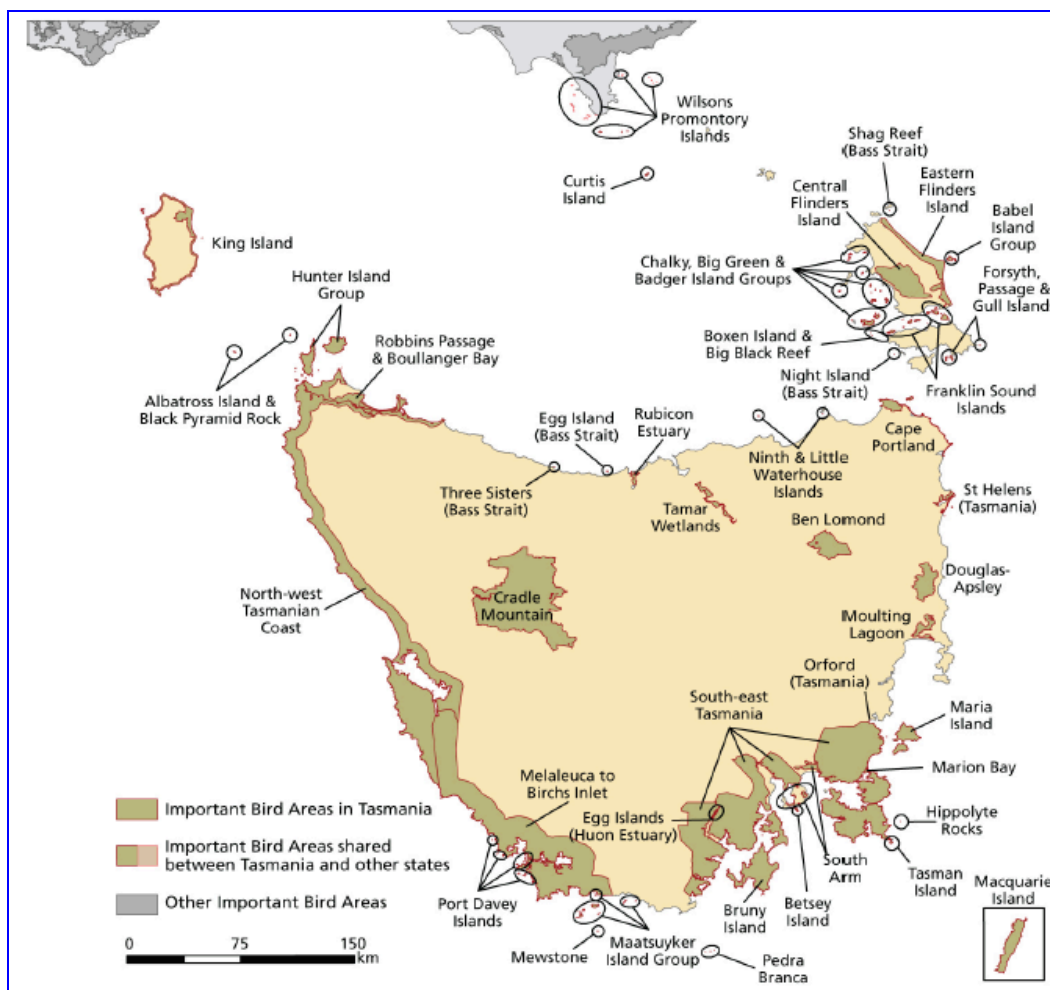


Figure 1. Important Bird Areas (IBAs) in Tasmania
(source: <http://birdlife.org.au/projects/important-bird-areas/iba-maps>).

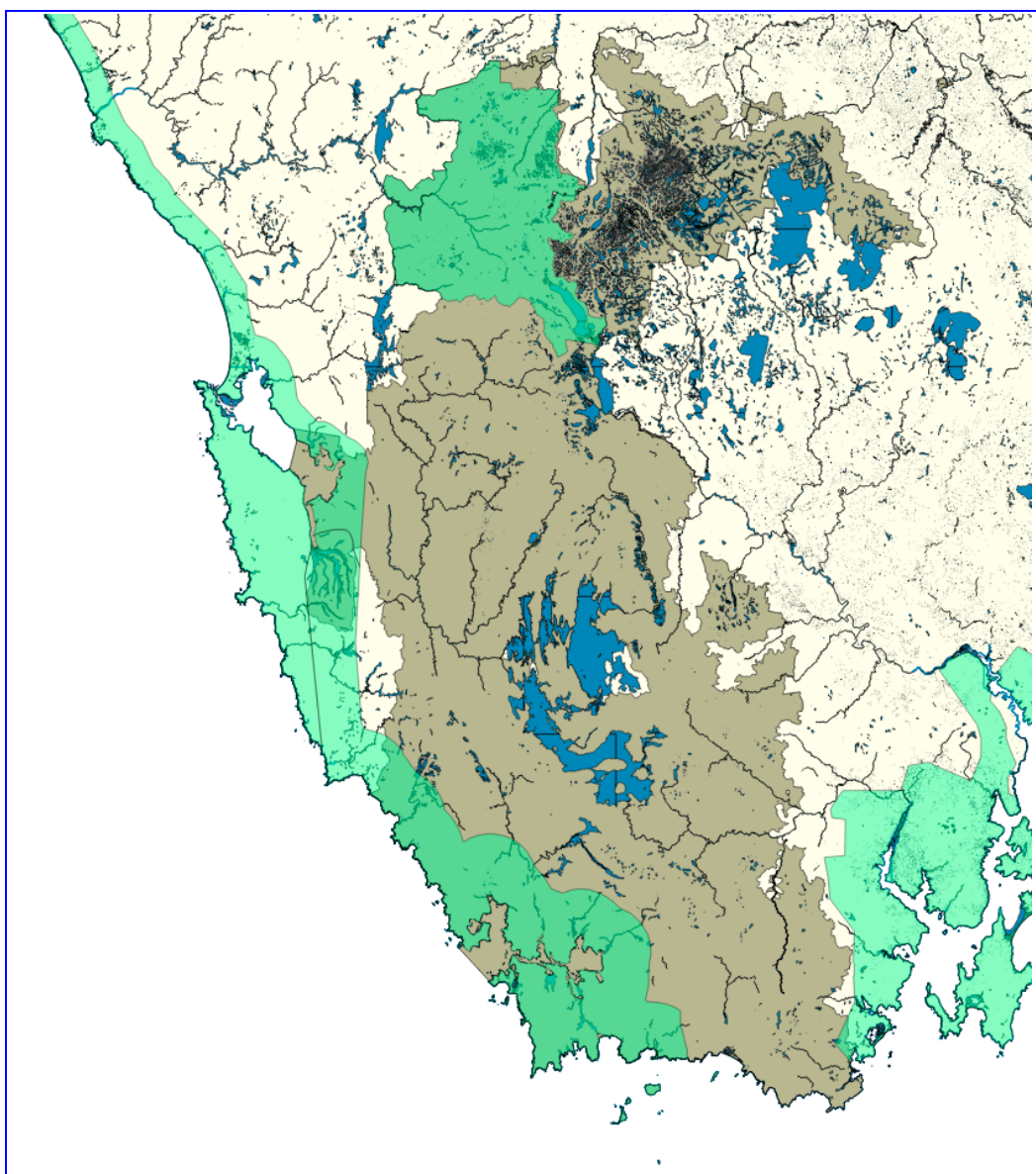


Figure 2. Detail map showing the locations of Important Bird Areas (green shading, IBAs) that overlap the Tasmanian Wilderness World Heritage Area (brown shading, TW WHA) (sources: BirdLife Tasmania (IBAs) and World Heritage Areas - Commonwealth of Australia, Department of the Environment 2013, available from <http://www.environment.gov.au/fed/catalog/search/resource/details.page?uuid={6C54FE6C-2773-47C6-8CBC-4722F29081EF}>).



The presence of internationally significant populations of woodland and colonial seabirds has been largely overlooked in the TW WHA DMP 2014. The words 'bird' or 'seabird' appear just six times in the document with near-zero recognition of their conservation status or endemism; more often than not, they are simply being acknowledged as "present" or "breeding" in the TW WHA.

The Endangered species, Azure Kingfisher, Grey Goshawk, Masked Owl and Wedge-tailed Eagle are not mentioned at all in the Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014.

We note also that the Eastern Hooded Plover was recently recognised as Vulnerable under the Australian Government's EPBC Act (1999) – see <http://www.environment.gov.au/biodiversity/threatened/species/pubs/66726-conservation-advice.pdf> and this should be reflected in the Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014.

BirdLife Tasmania believes that all taxa (birds and others) that have an elevated conservation status (*Rare, Vulnerable and Endangered*, and in the case of the Orange-bellied Parrot which is *Critically Endangered*), must be listed in the Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014. The absence of such fauna and flora lists of taxa with elevated conservation status is unacceptable and inconsistent with best practice.

Fragmentation and biodiversity, additional pressures on Endangered species

The greatest pressures on Australia's biodiversity emanate from habitat loss, degradation, fragmentation and habitat alienation. These pressures were recognised more than a decade ago (eg *Australian Terrestrial Biodiversity Assessment 2002*, NHT Commonwealth of Australia) and are explicitly acknowledged in *Australia's Biodiversity Conservation Strategy 2010 – 2030* (NRM MC 2010).

Other pressures arise from threats such as invasive species and inappropriate land management (including fire regime). All of these pressures will either be introduced or their existing levels increased if the Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 is adopted and implemented.

These pressures are recognised explicitly in the EPBC Act (1999) as Key Threatening Processes to Australia's biodiversity: *Land clearance* (4 Apr 2001), *Loss and degradation of native plant and animal habitat by invasion of escaped garden plants, including aquatic plants* (8 Jan 2010), and *Novel biota*



and their impact on biodiversity (26 Feb 2013) – see <http://www.environment.gov.au/cgi-bin/sprat/public/publicgetkeythreats.pl> for further details.

The proposal to allow logging and mining in the TW WHA is utterly unacceptable, as it represents the greatest threat to the woodland bird species of the TW WHA, including Endangered species such as the Grey Goshawk and Masked Owl, and the Wedge-tailed Eagle.

The removal of native habitat for logging and mining introduces increased pressures on Endangered and other non-listed species, and is inappropriate for a World Heritage property. Logging and mining must be explicitly prohibited from all areas of the TW WHA.

The use of fire in the TW WHA must be undertaken with extreme caution. Fire can easily damage and destroy extensive areas of sensitive vegetation, and “controlled” burns have been known to escape and damage extensive areas in Tasmania.

A highly precautionary approach to the use of fire in the TW WHA is critical to maintain existing biodiversity and to protect areas of sensitive and significant habitats.

Climate change, which is also recognised as a Key Threatening Process (*Loss of climatic habitat caused by anthropogenic emissions of greenhouse gases*, 4 Apr 2001), will compound and exacerbate existing and future threats to biodiversity, placing further pressures on species and increasing their likelihood of extinction.

The Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 represents serious risks to Tasmania’s avifauna diversity and their habitats through habitat fragmentation with increased roads and infrastructure, habitat alienation through increased human use of avian habitats, greater opportunities for invasive species (particularly *Phytophthora cinnamomi*, feral cats and rats).

Human activities and any associated infrastructure(s) create short-term to long-term disturbance and disruption to resident species, and alienate the immediate areas around them, preventing their use for feeding, nesting or migration by birds and other species.

These alienated areas serve to fragment the landscape and habitats, reducing the habitats available to the birds (and other fauna). Habitat alienation is as critical as habitat loss and fragmentation, but is less obvious as humans perceive an “intact” landscape.



The Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 fails to acknowledge the potential for, or the existence of cumulative impacts to Tasmania's birds and their habitats in the TW WHA. Each "threat", "impact", event or activity is considered in isolation, with no consideration for assessing or considering synergies.

The Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 will see an increased risk of extinction to the Endangered birds present in the TW WHA as a result of increased pressures, increased synergies (including climate change) and the cumulative impacts of pressures on these species. Such an outcome is completely unacceptable in the 21st Century.

The use of the TW WHA by six species of Endangered birds, including the Critically Endangered Orange-bellied Parrot reinforces the compelling need for the application of the Precautionary Principle in all aspects of managing the TW WHA.

Their current conservation status reflects low populations with a significant probability of extinction, (the Orange-Bellied Parrot is at extremely high risk of extinction in the near future), and the Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 does nothing to improve the species' chances for survival.

The Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 promotes increased infrastructure, increased disturbance, increased habitat fragmentation and alienation and increases the risks from invasive species.

In doing so, the Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 reduces the capacity of the TW WHA to maintain functioning ecosystem services and food webs essential for the maintenance of the six species of Endangered birds, increasing the likelihood of their extinction in the future.

The Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 has been written to actively facilitate, support and promote increased tourism in areas of international significance in preference to the appropriate management and conservation of these areas.

Whilst BirdLife Australia recognise the important role appropriately designed tourism can play increasing awareness and engagement with nature, we are concerned that substantially increased, commercially driven and/or



insensitive tourism will place unacceptable pressures on natural values, including Endangered species.

Tourism has been elevated to primacy ahead of conservation, and the role of the Tasmania Parks and Wildlife Service (TPWS) has been diminished to that of subservience to the tourism industry. This is unacceptable and inappropriate for a World Heritage property and the previous arrangement where PWS are responsible for managing the TW WHA must be restored. Commercial operators are not trained in nature conservation or the management of areas of international significance.

The conservation and management of wilderness values and the species that are dependent on these areas must take precedence over commercial tourism efforts. It is critical that the protection of wilderness and concomitant values must be maintained as the highest priority for the management of the TW WHA.

The existing wilderness zone in the TW WHA must be retained and its management regime strengthened to ensure its persistence into the future. The current restrictions on landing aircraft in the TW WHA must be tightened, rather than relaxed, and jet skis prohibited from the TWA in its entirety. No new accommodation, standing camps or other infrastructure for commercial efforts should be allowed.

Proposals to increase aircraft access to the TW WHA and the proposal to permit jet skis in the TW WHA are likely to increase disturbance to habitats and species, with the highest levels of activity and use of aircraft and jet skis during the summer months, coincident with the breeding seasons of the birds in the TW WHA, including the Endangered species noted above.

All development and construction of accommodation and associated infrastructure (aircraft landing sites, tracks and storage facilities etc) will require the removal of native habitats, will fragment the habitats, and provide novel areas and routes for invasive species and diseases.



Concluding comments

BirdLife Tasmania believes the Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 will fail to protect the internationally-significant populations of Endemic and Endangered bird species that rely on the TW WHA, and as a consequence, will increase the pressures and threats to the internationally-significant populations of Endemic and Endangered bird species that rely on the TW WHA.

Further, BirdLife Tasmania believes the Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 in its current form is manifestly deficient in protecting internationally-significant bird and other natural values, and fails to maintain the ecological integrity of the TW WHA.

Thus, BirdLife Tasmania believes the Draft Tasmanian Wilderness World Heritage Area (TW WHA) Management Plan 2014 in its current form must be rejected and must be re-written to comply with current best practice to WHA management as per IUCN requirements, objectives and guidelines.

Finally, BirdLife Tasmania requests the Tasmanian Planning Commission conducts public hearings for stakeholders to raise their extensive concerns to the Tasmanian Government as a matter of the highest priority.

Yours sincerely

Dr Eric J Woehler
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