

SUBMISSION ON THE DRAFT TASMANIAN WILDERNESS WORLD HERITAGE AREA MANAGEMENT PLAN



Tall-eucalypt forests in the Tasmanian Wilderness. Logging is now a permitted activity in this forest. Protection of Outstanding Universal Values and wilderness quality is threatened by a proposed new management plan. Photo by Rob Blakers.

Prepared by: the Wilderness Society, Australian Conservation Foundation and Environment Tasmania

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This Submission

This submission arises from the Draft Management Plan for the Tasmanian Wilderness ('the Draft Plan'), released for public consultation by the Tasmanian Government in January 2015 (DPIPWE 2014).

The Wilderness Society (TWS) is a national environmental advocacy organisation whose purpose is protecting, promoting and restoring wilderness and natural processes across Australia for the survival and ongoing evolution of life on Earth. TWS works in line with the following set of specific values; passion for our purpose, the power of people to make change, organisational independence and integrity, compassion in dealing people, and a commitment to success in protecting the environment. TWS is a community-based organisation with campaign centres located in most state capital cities. In Tasmania it has campaign hubs in Hobart and Launceston. The Wilderness Society has been associated with the Tasmanian Wilderness World Heritage Area since its nomination in 1981, being the organisation that spearheaded the original nomination and listing, and collaborated on the 1989 extension, and the 2010, 2012 and 2013 minor modifications.

Environment Tasmania (ET) is a not-for-profit conservation council dedicated to the protection, conservation and rehabilitation of Tasmania's natural environment. Australia's youngest conservation council, Environment Tasmania is a peak body representing over 20 Tasmanian environment groups, with collective representation of over 5000 Tasmanians.

Australian Conservation Foundation (ACF) is a national environmental advocacy organisation that has been a leading voice for conservation in Australia for nearly 50 years. ACF works with the community, business and government to protect, restore and sustain our environment. ACF has over 190,000 active supporters across Australia.

This submission contains numerous comparisons of the Draft Plan with the following documents:

- The current management plan for the Tasmanian Wilderness (Service 1999);
- The 1992 management plan for the Tasmanian Wilderness (Department of Parks 1992);
- The 2010 draft Statement of Outstanding Universal Value (Australia 2010).

An Appendix contains direct comparisons between the Draft Plan and the current (1999) Plan.

TWS, ACF and ET acknowledge the traditional Aboriginal owners of all Country in Tasmania and pay our respects to elders past and present and the Tasmanian Aboriginal Community. We support efforts to progress reconciliation, land justice and equality. We recognise and welcome actions that seek to better identify, present, protect and conserve Aboriginal cultural heritage, irrespective of where it is located.

Summary

The Tasmanian Wilderness is one of only two properties worldwide listed for seven criteria for Outstanding Universal Value, including all four for natural heritage. The new management plan currently being prepared for the Tasmanian Wilderness should clearly state those values and the actions required to protect them. Its publication is an opportunity for managers to inspire staff and the public to participate in passing on, unimpaired, a place whose importance has been recognized by the world.

The Draft Plan says now is a critical time for the Tasmanian Wilderness:

The natural values of the TWWHA have not faced greater or more rapid changes for thousands of years. Climate change, fire and incursions by invasive species are among the major threats to the area's natural values and processes. Responses can be complex and difficult to predict because of interactions between different components of the ecosystem.

Pages 99-101, Draft Plan

The Draft Plan for the Tasmanian Wilderness should have outlined a convincing response to these threats, consistent with the requirements of the World Heritage Convention and Operational Guidelines. **Instead, it contains many deeply disturbing features that dismantle previous protections:**

- The Draft Plan does not apply to the entire World Heritage Area. Significant tracts of public land are excluded from the Draft Plan, including 25,000 ha of spectacular forested land in the Great Western Tiers, upper Mersey and Dove River areas. This land contains significant cultural-heritage sites, karst, tall-eucalypt forests and rainforest and is a significant contributor to the property's Outstanding Universal Value. Leaving it out subjects the Outstanding Universal Value in these places open to mismanagement, neglect and abuse – contrary to the World Heritage Convention;
- The Draft Plan fails to properly list the characteristics of the Tasmanian Wilderness that qualify for each of the seven criteria for Outstanding Universal Value;
- The Draft Plan fails to explain how each of these values and their corresponding conditions of integrity will be protected and maintained;
- The Draft Plan removes the concept and protection of wilderness. Previous plans have protected and enhanced wilderness 'as the primary means' of maintaining the natural and cultural values of the property and associated conditions of the integrity. The Draft Plan jettisons this essential tool without putting anything in its place for the protection of Outstanding Universal Value and integrity;
- The Draft Plan removes protection from logging of significant tracts (approximately 200,000 ha) of the property. This pertains to areas of outstanding rainforests and tall-eucalypt forests in areas such as the Styx, Weld and Florentine valleys. This move violates the World Heritage Convention and repeated requests from the World Heritage Committee to Australia. Logging would damage forests of recognised Outstanding Universal Value;
- The Draft Plan permits mineral exploration and potential mining in approximately 172,000 ha of the property. If mining goes ahead, it will damage Outstanding Universal Value;
- The Draft Plan permits intrusive mechanised access into remote, secluded and sensitive places that have been protected from such developments, thereby damaging qualities of seclusion and tranquillity;
- The Draft Plan contains provisions that would sideline the Parks and Wildlife Service when it comes to the making of policy. Instead, key decisions pertaining to the natural environment will be embodied in a Tourism Master Plan, or made by an Assessment Panel evaluating tourism developments, or made by a Cultural Business Unit. This paves the way for paralysing administrative disputes over crucial matters such as fire management;

- The Draft Plan outlines new policy instruments (Tourism Master Plan, Expressions of Interest process) that could overrule the Management Plan itself, placing the protection of Outstanding Universal Value on a lower footing than recreation and tourism development;
- The Draft Plan proposes a policy on fire management that is contradictory and confused. While acknowledging the dual nature of fire – as both an essential management tool and one of the greatest threats to OUVs – the Draft Plan nevertheless contains many simplistic statements. Huge wildfires have occurred in the Tasmanian Wilderness in recent years; forecasters say there are more to come. A precautionary approach is therefore essential;
- The Draft Plan ignores the purpose and principles of the National Heritage Charter, despite the listing of the Tasmanian Wilderness as National Heritage.

In February 2015, the Australian government said that an updated draft statement of Outstanding Universal Value was with the advisory bodies (Australia 2015). This document has not been made public and it remains unclear whether it will be completed in time for it to be considered by the World Heritage Committee at its 2015 meeting in Bonn. In the meantime, the Draft Plan gives an incomplete, unstructured and erroneous description of Outstanding Universal Value for the Tasmanian Wilderness.

On the issue of cultural heritage, the Draft Plan gives mixed messages. The Tasmanian Wilderness is listed under World Heritage criteria (iii), (iv) and (vi) for cultural heritage. The Wilderness Society, ET and ACF greatly welcome increased efforts to identify and present Aboriginal cultural heritage and to involve Aboriginal people in the management of the property. However, the intrusions of logging, mining and commercial development into the Tasmanian Wilderness will be damaging to cultural heritage of Outstanding Universal Value. The removal of wilderness as an objective of management and as a management tool is a divisive and unnecessary move that has been rejected by several representatives of Aboriginal organizations.

Part of the process for preparing the Management Plan is already compromised. With respect to submissions from the public, the Tasmanian government has said it will reject recommendations that conflict with government policy. In addition, the Tasmanian Minister for National Parks has given a second chance to 13 development proposals already rejected by his Assessment Panel. Media reports indicate that the government's process for allowing developments inside national parks is a rolling one – that is, the previous 'deadline' for proposals has been superseded by an open invitation.

Additionally, the act of inviting public comment on the Management Plan, whilst at the same time progressing the approval of currently prohibited development proposals, treats public input with contempt and raises serious questions regarding the integrity of the consultation process.

The Draft Plan should be withdrawn because of its comprehensive failure to meet the requirements of the World Heritage Convention, Australian World Heritage Management Principles or the Operational Guidelines of the World Heritage Committee. A new management plan should be prepared under the auspices of the Parks and Wildlife Service (properly funded).

The recommendations in section 12 constitute the minimum required to produce a management plan to a standard worthy of a World Heritage property. They include properly listing the Outstanding Universal Values and conditions of integrity; incorporating the latest information on values; reinstating as a management objective the undertaking to 'identify, address and more fully understand' the natural and cultural values of the Tasmania Wilderness; applying the Management Plan to all public land within the Tasmanian Wilderness; reinstating the recognition and protection of wilderness as a crucial part of maintaining values and integrity; strengthening the protections in each management zone; reinstating restrictions on aircraft landings in order to maintain remoteness, tranquillity and naturalness; encouraging ecotourism in the Styx valley; explicitly prohibiting logging and mining in all parts of the Tasmanian Wilderness; upgrading the status of all public-land

reserves within the Tasmanian Wilderness to national park or equivalent; developing a more coherent and precautionary fire policy that explicitly undertakes to protect fire-sensitive vegetation such as rainforest; developing a strategy for rehabilitating parts of the World Heritage Area that had been logged prior to listing; recognising the preeminent role of the Parks and Wildlife Service; ensuring that the management plan remains the primary document determining policy, decisions and actions for the Tasmanian Wilderness; and ensuring that all public submissions are assessed on their merits rather than according to their compliance with government policy.

Over and above all, the protection of the Outstanding Universal Values and integrity of the Tasmanian Wilderness should form the foundation of a new management plan for the Tasmanian Wilderness. Protection, maintenance and enhancement of wilderness must be explicitly reinstated as the primary means for protecting the natural and cultural values of the World Heritage Area.

1. The function of a management plan for a World Heritage property

A management plan for a World Heritage property should help give effect to the following provisions of the World Heritage Convention:

- the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage (Article 4);
- the commitment of the State Party to take the appropriate legal, scientific, technical, administrative and financial measures necessary for the identification, protection, conservation, presentation and rehabilitation of this heritage (Article 5).

These fundamental objectives are expanded upon by clauses 96-199 of the Operational Guidelines (UNESCO 2013). Key clauses include (**emphases added**):

96. Protection and management of World Heritage properties should ensure that their Outstanding Universal Value, including the conditions of integrity and/or authenticity at the time of inscription, are sustained or enhanced over time. A regular review of the general state of conservation of properties, and thus also their Outstanding Universal Value, shall be done within a framework of monitoring processes for World Heritage properties, as specified within the *Operational Guidelines*.

98. Legislative and regulatory measures at national and local levels should **assure the survival of the property and its protection against development and change that might negatively impact the Outstanding Universal Value, or the integrity and/or authenticity of the property.** States Parties should also assure the full and effective implementation of such measures.

109. The purpose of a management system is to ensure the effective protection of the nominated property for present and future generations.

117. States Parties are responsible for implementing effective management activities for a World Heritage property. State Parties should do so in close collaboration with property managers, the agency with management authority and other partners, and stakeholders in property management.

119. World Heritage properties may support a variety of ongoing and proposed uses that are ecologically and culturally sustainable and which may contribute to the quality of life of communities concerned. **The State Party and its partners must ensure that such sustainable use or any other change does not impact adversely on the Outstanding Universal Value of the property. For some properties, human use would not be appropriate. Legislations, policies and strategies affecting World Heritage properties should ensure the protection of the Outstanding Universal Value,** support the wider conservation of natural and cultural heritage, and promote and encourage the active participation of the communities and stakeholders concerned with the property as necessary conditions to its sustainable protection, conservation, management and presentation.

The management plan that has applied to the Tasmanian Wilderness from 1999 to the present has fulfilled the above requirements. Its high standard has been recognized through the following awards:

- Planning Institute of Australia (PIA) Tasmanian State Award and Australian National Award for conservation planning (2003/2004);
- The Australian Federal Minister's Award for Planning Excellence 2004 (winner across all categories of the PIA Awards).

The 2015 Draft Plan should have attempted to at least match this standard of excellence.

There are fundamental areas where the Draft Plan fails this test:

- The Draft Plan does not apply to the entire Tasmanian Wilderness. There are significant areas of public land within the World Heritage Area to which the Draft Plan does not apply, particularly the 25,000 ha of so-called ‘Future Potential Production Forest Land’ in the Great Western Tiers, upper Mersey and Dove River regions. These areas contribute significantly to Outstanding Universal Value through their tall-eucalypt forests, rainforests and sandstone shelters (Aboriginal cultural heritage);
- The Draft Plan fails to adequately identify and describe the Outstanding Universal value of the property and associated conditions of integrity, thereby failing to ensure these are protected, presented and (where necessary) rehabilitated;
- The Draft Plan removes an essential tool – protection of wilderness – for protecting Outstanding Universal Value and associated conditions of integrity. Previous plans described protection of wilderness as ‘the primary means’ for maintaining the natural and cultural values of the property;
- The Draft Plan fails to specify how the cumulative impacts of proposed commercial tourism developments will be assessed and addressed;
- The Draft Plan fails to deal adequately with the crucial issue of fire management, having identified the nexus between climate change and fire as one of the most serious threats to the Outstanding Universal Value of the Tasmanian Wilderness;
- The Draft Plan fails to adequately identify how natural and cultural heritage within the Tasmanian Wilderness will be rehabilitated, thereby failing to fulfil article 5 of the World Heritage Convention;
- The Draft Plan embodies means by which the final Statutory Management Plan for the Tasmanian Wilderness can be sidelined and overridden, thereby seriously undermining the means by which the Australian government fulfils its obligations under the World Heritage Convention.

In addition, the Draft Plan ignores the purpose and principles of the National Heritage Charter, despite the listing of the Tasmanian Wilderness as National Heritage.

The above failings mean that the Draft Plan fails to meet its requirements under the World Heritage Convention, the World Heritage Operational Guidelines and the Australian World Heritage Management Principles. It should be withdrawn and a new plan developed according to the recommendations in section 12 of this submission.

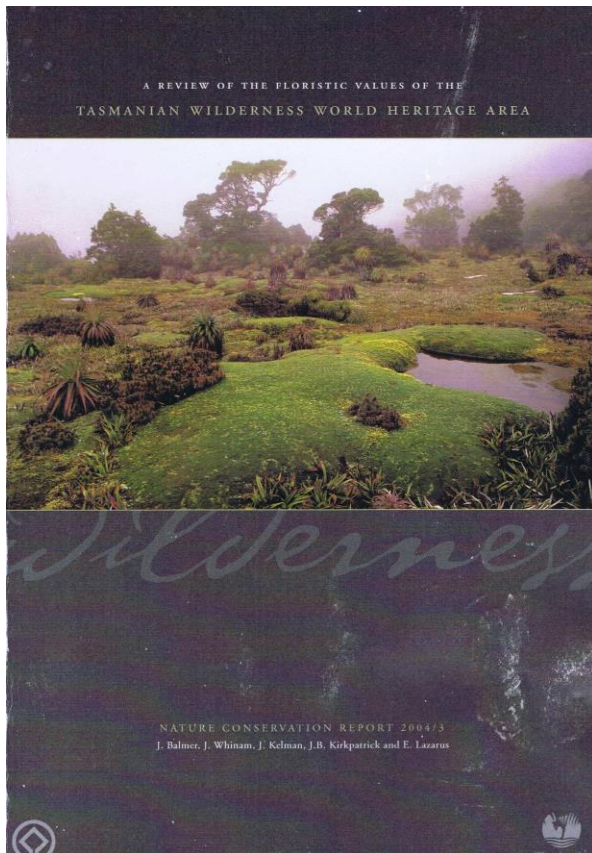
2. Outstanding Universal Value and Conditions of Integrity inadequately described

The Tasmanian Wilderness is one of only two World Heritage properties in the world to satisfy seven criteria for Outstanding Universal Value – three for cultural criteria and four for natural criteria. These seven criteria are listed on page 25 of the Draft Plan. The listing of the characteristics of the Tasmanian Wilderness that correspond to each criterion would have formed a sound basis for stating the Outstanding Universal Value and identifying the management actions necessary to maintain them.

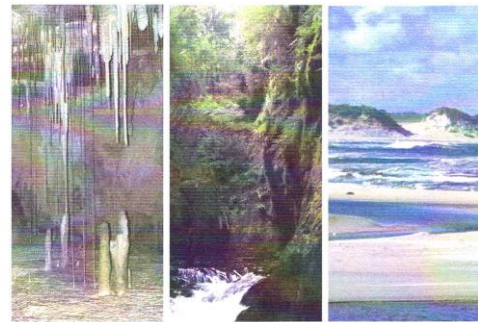
However, there is no attempt to link the qualifying characteristics of the Tasmanian Wilderness with their respective criteria. Instead, there is an unstructured and incomplete description (pages 40-45, Draft Plan). The disorganised presentation makes it difficult to cross-check this commentary against more structured statements such as the 2010 draft Statement of Outstanding Universal Value.

The Draft Plan fails to mention crucial work completed since 2000 to identify and describe natural values. It pointedly ignores two reports carried out under the auspices of the Tasmanian government

specifically for the purpose of identifying World Heritage values. The first of these (Sharples 2003) is a comprehensive description of the landforms of the Tasmanian Wilderness under the term ‘geodiversity’. The second is a detailed description of the ‘floristic values’ of the Tasmanian Wilderness (Balmer J. 2004). These ground-breaking works are referred to neither in the body of the Draft Plan nor its Bibliography – an omission that is both perplexing and negligent.



A REVIEW OF THE GEOCONSERVATION VALUES
OF THE
TASMANIAN WILDERNESS WORLD HERITAGE AREA



Chris Sharples

Nature Conservation Report 03/06

Nature Conservation Branch,
Department of Primary Industries, Water and Environment
2003



IGNORED! Two government reports on World Heritage values – completely ignored by the Draft Plan. No reference to the content, no mention in the bibliography. (Balmer J. 2004 and Sharples 2003)

Given the above omission, it is telling that the Draft Plan has omitted from the objectives of management the 1999 objective to ‘identify, address and more fully understand’ the natural and cultural values of the Tasmanian Wilderness. **This objective of management should be reinstated.**

The Draft Plan says that a new draft Statement of Outstanding Universal Value was to be published by the Australian government in February 2015 (p. 25). That did not occur. The description of Outstanding Universal Value in the Draft Plan is therefore incomplete.

2.1 Cultural Heritage

The description of the cultural values in the Draft Plan has little in common with that in the draft statement of OUVs (2010) or with nomination documents (Government 1982, 1989, 2010). There is no attempt to relate the heritage described to cultural criteria (iii), (v) and (vi) for OUV.

This unstructured account lacks a clear description of the limestone caves of Southwest Tasmania, their ancient record of Aboriginal occupation from over 35,000 years ago until about 12,000 years ago, their art, and their significance to the Aboriginal way of life during those millennia.

Technically, some of these caves lie outside the area covered by the Draft Plan. However, they occur inside very small enclaves embedded within the Draft Plan area. The integrity of the caves is clearly affected by their surrounds, so the Draft Plan should have made a point of identifying their values and pertinent conditions of integrity.

In 2014, at its Doha meeting, the World Heritage Committee requested the State Party to:

*4 a) Undertake further study and consultation with the Tasmanian Aboriginal community in order to provide more detailed information on the cultural value **of the property** and how these relate to the Outstanding Universal value,*

38 COM 8B.47 (Emphasis added) (UNESCO 2014).

In its 2015 State of Conservation report on the Tasmanian Wilderness, the Australian government describes its process for properly identifying and describing cultural-heritage values within the 2013 extension (p. 18, Australia 2015). The process as described appears acceptable other than for the following exceptions:

- The Australian government says that the next report on progress will not occur until 2018. Given that this work has already been long delayed, The Wilderness Society, ET and ACF believes a further three-year delay in reporting is unacceptable. Annual updates would be more appropriate;
- Consultation with the Aboriginal community on other matters associated with cultural heritage has been criticised as inadequate (see sections 3 and 4 below). It is therefore difficult to accept at face value the government's claim that adequate consultation is occurring;
- The 2014 request from the World Heritage Committee appears to pertain to the entire property, not just to the area covered by the 2013 extension (see below). A whole-of-property description of Aboriginal cultural heritage, structured according to criteria (iii), (v) and (vi), would be consistent with repeated requests made by ICOMOS since 1989.
- A whole-of-property assessment should consider the broader geographic context.

A study of the Aboriginal cultural heritage of the entire property should be carried out with annual updates to the World Heritage Committee.

2.2 Natural Heritage

The Draft Plan's listing of natural Outstanding Universal Values is unstructured and incomplete. It is pointedly inadequate with respect to key features of the Tasmanian Wilderness such as the Franklin and Gordon rivers; the meromictic lakes; and the tall-eucalypt forests.

With respect to the criteria for Outstanding Universal Value listed in the draft statement (Australia 2010), the Draft Plan is inadequate in the following areas:

- Criterion (vii): overall this is very understated. The stunning beauty of the wild rivers, glacial landscapes, dynamic coastline and giant trees is not mentioned. The work of renowned wilderness photographers has been ignored; most photographs in the plan show recreationists, with the natural environment relegated to a mere backdrop
- Criterion (viii) – features such as the wilderness condition, periglacial processes, lacustrine processes and the undisturbed coastline are inadequately described.
- Criterion (ix). The global significance of some of the fauna (freshwater crayfish, marsupials) is understated. The global importance of the freshwater systems – lakes, rivers, tarns, lagoons and meromictic lakes – appears understated. The importance of the wilderness condition of the World Heritage Area should be emphasised.
- Criterion (x). The tall-eucalypt species and meromictic lakes biota are not mentioned. The wilderness condition free of introduced species and pathogens should be emphasised.

In what appears to be a sleight of hand, the tall-eucalypt forests of the Tasmanian Wilderness are presented as having Tasmanian significance only:

*The TWWHA is also significant in a **Tasmanian context**. ...There are stands of tall eucalypt forest and secure habitats for many species of animal.... The Styx River Valley includes exceptional stands of *Eucalyptus regnans*, the world's tallest flowering plant. This area has the highest concentration (more than 30) of registered 'Giant Trees' (85 metres tall or 280 cubic metres in volume) in Tasmania, with many trees over 90 metres tall and some close to 100 metres. Some of those trees feature larger girths and buttresses on the lower trunks than California's redwoods. Page 45, Draft Plan (Emphasis added)*

Ignoring the Outstanding Universal Value of the tall-eucalypt forests and their giant trees is in keeping with the Tasmanian government's desire to log parts of the Tasmanian Wilderness (see below) and last year's attempt by the Australian government to de-list part of the Tasmanian Wilderness in order to allow logging.

As well as being of Outstanding Universal Value, a World Heritage property must also fulfil 'conditions of integrity'. On page 25, the Draft Plan lists the criteria for OUV under which the Tasmanian Wilderness qualifies for World Heritage listing. However, the Draft Plan fails to list the corresponding conditions of integrity. Indeed, the term 'integrity' is seldom used in the Draft Plan.

With its unstructured, erroneous and incomplete identification of Outstanding Universal Value and conditions of integrity, the Draft Plan fails the fundamental requirement identified by the World Heritage Committee's operational guidelines. There is therefore no secure foundation for protecting the World Heritage values of the Tasmanian Wilderness.



Tall-eucalypt forests in the Styx Tall Trees Conservation Area, part of the Tasmanian Wilderness. The Draft Plan says that these forests, of recognised Outstanding Universal Value, are of Tasmanian significance only, in an apparent attempt to dismantle protection from logging. Photo by Geoff Law

3. The Removal of Wilderness as a Management Objective and the Impact on Values and Integrity

Wilderness is one of the defining – and renowned – characteristics of Tasmania’s World Heritage Area. The 1999 Plan defined wilderness as it applies to management of the Tasmanian Wilderness.

A wilderness area is an area that is:

- of sufficient size to enable the long-term protection of its natural systems and biological diversity;
- substantially undisturbed by colonial and modern technological society;
- remote at its core from points of mechanized access and other evidence of colonial and modern technological society.

Page 92, 1999 Plan

Protection of wilderness has been a key strategy to maintain the natural and cultural values of the property. This is demonstrated by the following parts of the 1999 and 1992 management plans:

Wilderness Zone Objectives

- ***To allow natural processes to operate with minimal interference***
- *To retain a challenging unmodified natural setting that suitably experienced and equipped people can visit for wilderness recreation and scientific purposes*
- ***To use wilderness as a primary means of managing, protecting and conserving World Heritage and other natural and cultural values.***

Page 57, 1999 Plan (emphasis added)

The wilderness quality of the WHA has, until relatively recently, safeguarded its special natural and cultural features.

Page 93, 1999 Plan

To conserve the values of the WHA in a manner consistent with their natural and cultural significance, and where appropriate, feasible and sustainable, to rehabilitate or restore degraded values. In particular to:

4.1 maintain or restore natural diversity and processes;

4.2 maintain or enhance wilderness quality;

4.3 maintain or enhance environmental quality;

4.4 maintain or enhance landscape quality;

4.5 protect and conserve historic heritage and Aboriginal heritage (in partnership with the Aboriginal community).

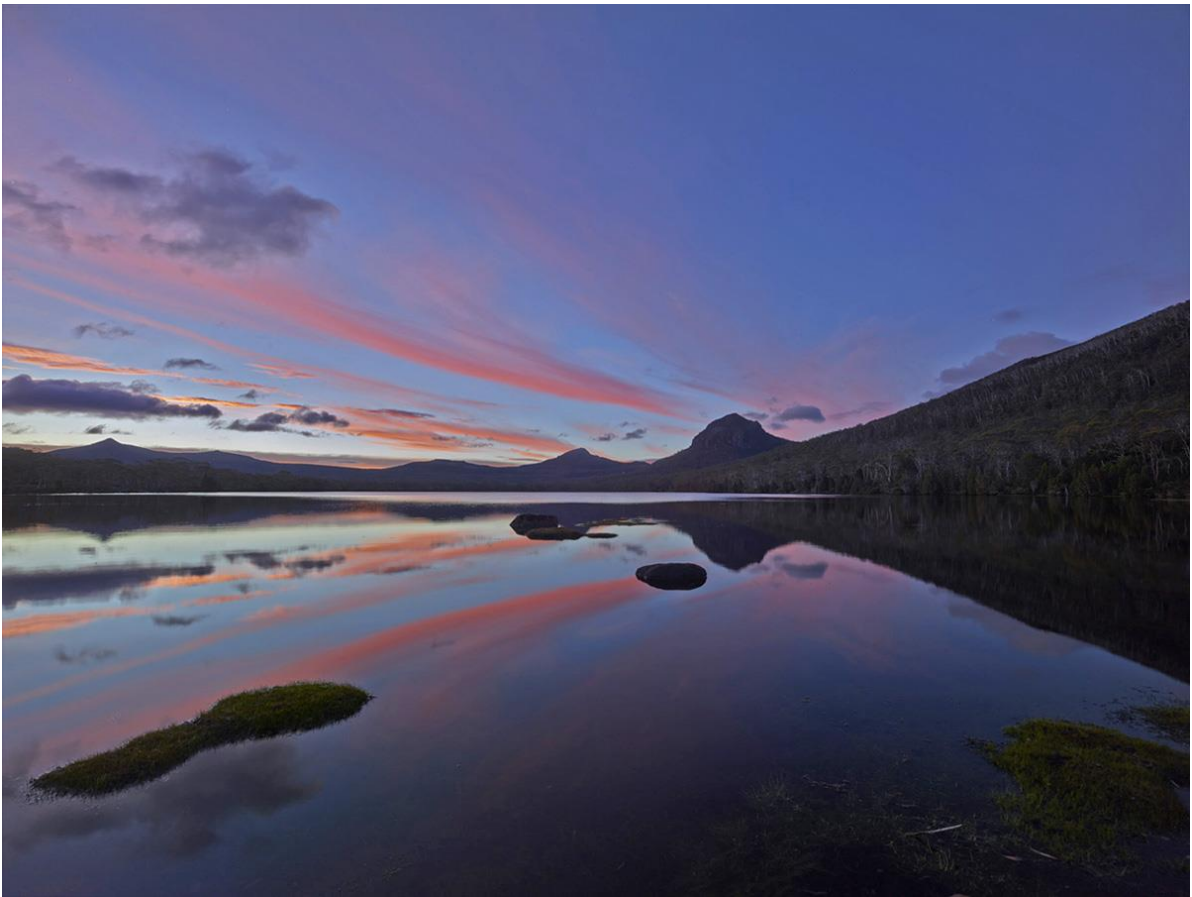
Page 30, 1999 Plan (emphasis added)

Clearly, protection of wilderness was the ‘primary means’ of conserving and enhancing natural and cultural values and associated conditions of integrity.

Other crucial documents about the Outstanding Universal Value of the Tasmanian Wilderness – including the nomination documents of 1982 and 1989 – extol its wilderness character:

The nominated area comprises most of the last great temperate wilderness remaining in Australia, and is one of only a few such regions in the world... It is this wilderness quality which underpins the success of the area in meeting all four criteria as a natural property and which is the foundation for the maintenance of the integrity of both the natural and cultural values which are displayed.

Page 27, 1989 nomination document (Government 1982, 1989, 2010)



Lake Petrarch, part of the Tasmanian Wilderness. This is one of many secluded locations to be subjected to helicopter tourism under the Draft Plan. Photo by Rob Blakers.

The Tasmanian Wilderness is one of the largest temperate wilderness regions in the southern hemisphere, and is a place where natural geomorphic and soil processes continue to operate in a largely unmodified fashion.

Page 4, Draft Statement OUV 2010

A primary value of the area resides within, and is protected by, its extensive area and essentially wild and largely undisturbed nature.

Page 5, Draft Statement OUV 2010

Its value resides within, and is protected by, its essentially wilderness nature where the direct impacts of western industrial and agricultural practices are restricted to a few isolated locations on its borders.

Page 5, Floristic Values Report (Balmer J. 2004)

On a global scale, the Tasmanian WHA can best be compared with two other temperate wilderness areas in the Southern Hemisphere – South West New Zealand and Los Glaciares in Argentina (both World Heritage sites).

Page 3, 1992 Plan; page 3; page 22, 1999 Plan.

The wilderness area encompassing these values is recognized as being of such outstanding international significance that its perpetuation is of concern to all humanity.

Page 13, 1992 Plan.

For the modern Australian community perhaps the most significant cultural value of the Tasmanian wilderness is as a place for reflection, a source of inspiration and a symbol of the idea of untouched

nature. In these times of widespread environmental degradation, for many people there is great value in simply knowing that a large area of temperate wilderness still exists in Australia.

Page 14, 1992 Plan; page 25, 1999 Plan

The above statements make it clear that wilderness is not only an essential value in its own right; its protection also ensures the maintenance of many other natural and cultural values – including those of Outstanding Universal Value.

Yet the Draft Plan proposes jettisoning this fundamental characteristic of the World Heritage Area. It removes protection of wilderness as an objective of management (page 33, Draft Plan). It does away with the Wilderness Zone, calling it instead a ‘remote recreation zone’ (page 55, Draft Plan). In doing so, it shows a disregard for the critical importance of wilderness in maintaining Outstanding Universal Values and conditions of integrity.

The **undisturbed** character of the Tasmanian Wilderness has been identified as important for protecting sensitive cultural heritage from the damaging impacts of modern humanity:

The outstanding cultural value of the Tasmanian Wilderness WHA is the rich, undisturbed suite of Pleistocene Aboriginal sites dating back over 35,000 years which include cave paintings and cultural deposits bearing testimony to an Ice Age society. Lack of disturbance enhanced the values of these sites.

Page 24, 1999 Plan

These sites (Holocene Aboriginal coastal sites), which have been relatively undisturbed by European settlement, are significant examples of a traditional settlement pattern.

Page 24, 1999 Plan

Whether described as wilderness or as ‘undisturbed’, the remote and intact nature of the Tasmanian Wilderness has clearly been instrumental in the preservation of Aboriginal cultural heritage. The casual manner in which the Tasmanian government is prepared to discard this essential quality of the Tasmanian Wilderness is deeply disturbing.

The Wilderness Society, ET and ACF therefore strongly contend that the attack on wilderness and its abandonment as a management goal and strategy undermine the protection of Outstanding Universal Values and integrity.

Protection of wilderness as an objective of management and as a tool for protecting Outstanding Universal Value and integrity should be reinstated in the Plan, as should explicit recognition that the protection of wilderness ensures the maintenance of many other values (including karst, glacial features, alpine vegetation, rainforest, tall-eucalypt forest, coastal features and Aboriginal cultural heritage).

Protecting wilderness has been the ‘primary means’ of maintaining Outstanding Universal Value and it should remain so.

4. Mixed Messages on Management of Cultural Heritage

Measures proposed in the Draft Plan that the Tasmanian government says will improve management of cultural heritage include:

- The establishment of a Cultural Business Unit within the Department of Primary Industries, Parks, Water and Environment;
- Development of a dual naming policy to incorporate Aboriginal names for major features and the title of the World Heritage Area itself;
- The re-naming of the Wilderness Zone a ‘remote recreation zone’;

- Advancement of arrangements for joint management with Tasmanian Aboriginal people;
- Better identification of cultural-heritage values;
- Improved staff training and presentation relating to cultural heritage.

The Wilderness Society, ET and ACF welcomes the increased attention given by the Draft Plan to cultural-heritage values. Since 1989, ICOMOS and the World Heritage Committee have been calling for surveys and consultation with Aboriginal people to enhance knowledge and management of Aboriginal cultural heritage within the Tasmanian Wilderness. The moves by the State Party and the Tasmanian government to progress this consultation and assessment are long overdue.

However, The Wilderness Society, ET and ACF is also disturbed at the way in which some of the discussion on cultural heritage has been framed in the Draft Plan. Wording is frequently employed that appears to pit cultural heritage against wilderness and natural values as if they are competing concepts:

The use of the term 'wilderness' to describe the TWWHA is problematic for Aboriginal people. They believe the term wrongly implies that the TWWHA is a landscape empty of human culture. They say its use, in this way, lends weight to a denial of the full extent of Aboriginal occupation and survival in the TWWHA, and of contemporary Aboriginal rights. Past management has drawn a distinction, in the definition of 'wilderness', between evidence of, or remoteness from, modern or post-colonial activities and that of Aboriginal culture, which is acknowledged as having been fundamental to the shaping of what non-Aboriginals may perceive as wilderness. Nonetheless, it is difficult to properly acknowledge the TWWHA as a living cultural landscape, reflecting thousands of years of Aboriginal occupation, when the term 'wilderness' dominates perceptions of the TWWHA.

Page 91, Draft Plan

In fact, there are many Aboriginal people who do not object to the term 'wilderness' and accept it as a description of the wild, natural character of this World Heritage property and as a means to ensure the protection of Aboriginal cultural heritage:

As a Tasmanian Aborigine I reject the notion that wilderness can't exist hand in hand with recognition and respect of Aboriginal occupation, management and influence over the landscape. Wilderness is a necessary concept to protect Aboriginal cultural heritage in the Tasmanian Wilderness World Heritage Area and has long been used to demonstrate that Australia is protecting the Outstanding Universal Values of the area, including Aboriginal heritage values.

Rodney Dillon,

Tasmanian Aboriginal who was part of the official Australian delegation to the 2013 meeting of the World Heritage Committee in Phnom Penh, Cambodia.

News media have reported additional examples of concern from the Tasmanian Aboriginal people about removing the word 'wilderness' from the management of the area:

Tasmania's peak Aboriginal group has angrily rejected the state's justification for dropping the word "wilderness" from the state's prime wilderness zone, alleging that Aborigines are being "used" to "wedge" conservationists. ... The Tasmanian Aboriginal Centre told The Australian the justification for dropping the "wilderness" zone was "wrong".

"That's not the reason — they are trying to use us by pretending that's the reason," said TAC chief executive Heather Sculthorpe. "Many international legal definitions of wilderness allow for people to be in the landscape. "This is a blatant attempt to drive a wedge between us and the environment movement. It's a sham excuse for dropping the word 'wilderness'."

Ms Sculthorpe said if the government had been serious about addressing Aboriginal concerns, it would have addressed issues such as land handbacks and indigenous land management in the new plan. The draft plan proposes giving the TWWHA a joint Aboriginal name, but Ms Sculthorpe said

this too had been put forward without proper discussion.

“They didn’t bother to ask us before they put in the plan,” she said. “So you have to doubt their bona fides in all of this, I’m afraid.”

The government declined to respond yesterday to the TAC’s concerns.

<http://www.theaustralian.com.au/national-affairs/state-politics/tasmanian-indigenous-elders-were-part-of-the-sham/story-e6frgczx-1227192584795>

The Wilderness Society, ET and ACF strongly believe that the government is pursuing an unnecessarily divisive course by taking this line of argument. As discussed above, the definition of wilderness used in management plans to date accepts the habitation of Tasmania by Aboriginal people prior to the arrival of Europeans. These two critical elements of the Outstanding Universal Value of the Tasmanian Wilderness can be managed in tandem. Moreover, the government’s claimed concern for Aboriginal heritage smacks of hypocrisy when juxtaposed with its treatment of Aboriginal middens and other features of a recognized cultural landscape in another part of Tasmania.

The Western Tasmania Aboriginal Cultural Landscape is located on the coast approximately 60 km west of the northern part of the Tasmanian Wilderness. It is officially listed on the Australian National Heritage Register.

<http://www.environment.gov.au/heritage/places/national/western-tasmania>

In December 2014, the Tasmanian government announced that four-wheel-drive recreationalists would have access to a number of tracks in this heritage area that had previously been closed in order to protect cultural heritage. The government’s move provoked a storm of outrage from conservationists and Aboriginal groups alike:

4WD Tracks Reopen Like an Old Wound

...

Among those demanding federal intervention is Clyde Mansell, chairman of the Tasmanian Aboriginal Land Council, who fears further damage of ancient shell middens and hut depressions from ATVs and 4WDs.

“We are asking people to realise that what they are damaging is irreplaceable culture; a cultural heritage stretching back thousands of years,” Mr Mansell told The Weekend Australian. “This coastline was reserved because of its significance for Australia; not just a few people who want to ride four-wheel motorbikes across the landscape without respecting the damage that might be done.”

The Gillard government listed the Tarkine coast as protected on Australia’s National Heritage list in February last year, after an official assessment found it had “outstanding” Aboriginal heritage values.

<http://www.theaustralian.com.au/national-affairs/state-politics/tarkine-4wd-tracks-reopen-like-an-old-wound/story-e6frgczx-1227146480944>

The intended creation of a government Cultural Business Unit to manage issues associated with Aboriginal heritage is another government move that has not escaped controversy. Media have quoted representatives of some Aboriginal organizations criticizing the creation of a Cultural Business Unit as being inadequate to address their concerns:

The draft plan proposes dual naming of the area and what the Government is calling a “Cultural Business Unit” to better engage Aboriginal people in its management. But community leader Michael Mansell said that was not enough.

"We're disappointed because it's an anti-Aboriginal ownership document, it doesn't mention Aboriginal ownership of the areas at all," he said. "Leaving it in the hands of Department of Primary Industry and simply sitting one Aboriginal bum on a seat and give it dual naming, I mean that's clearly not acceptable to anybody and it not acceptable to Aboriginal people."

ABC News, 19 January 2015

<http://www.abc.net.au/news/2015-01-19/opposition-ramps-up-over-plans-to-allow-tourism-developments-in/6025986>

The Draft Plan is not just re-naming the Wilderness Zone. It is also dismantling the prescriptions that have protected these areas from the impacts of modern technological society. Tourists ferried by helicopters and float planes; commercial huts and other tourism developments; and potential logging and mining are all activities to which the 'remote recreation zone' will be subjected.

The Wilderness Society, ET and ACF welcome any progress in identifying cultural heritage, the promises of increased consultation with the Tasmanian Aboriginal community, and the prospects for joint management and other land-justice outcomes. However, we deplore the way in which the government has pitted Aboriginal cultural heritage against wilderness. The word 'wilderness' should be retained in the name of the World Heritage property. The Wilderness Zone and its protections should be reinstated.

Wilderness is a crucial means of protecting the ecological integrity of the World Heritage Area and the integrity of cultural-heritage values and must be maintained as an objective of management.

Both federal and state governments should accelerate and properly resource efforts to identify Aboriginal cultural heritage throughout the entire property.

5. Logging now permitted within parts of the Tasmanian Wilderness

Previous management plans completely protected the Tasmanian Wilderness from logging. Unfortunately, since September 2014, legislative changes in Tasmania have removed that protection from up to 172,000 ha of the property (over 10%). These changes are explicitly confirmed by the Draft Plan.

The Forestry (Rebuilding the Forest Industry) Act 2014 (Parliament 2014) was passed after the 2014 meeting of the World Heritage Committee in Doha. It annuls the historic, ground-breaking agreement between conservationists and the logging industry. It de-rails the process for declaring new reserves set up by the forest peace deal. And it removes protection from logging over large tracts of land. Areas of pre-existing reserve opened to potential logging under this legislation include all areas of Regional Reserve, Conservation Area and Potential Future Production Forest land – all categories of land within the World Heritage Area. An analysis of the impact of this legislation was carried out by the Environmental Defenders Office Tasmania (EDO 2014).

The Draft Plan confirms the impact of this legislative change (page 19). Approximately 172,000 ha of Conservation Areas and Regional Reserves occur within the Tasmanian Wilderness (Table 1.1, p. 20-23, Draft Plan). It is not feasible to log each and every one of these reserves as some are dominated by non-forest vegetation. However, many contain large tracts of commercially exploitable and vulnerable forest. The sections of the Draft Plan that explicitly pertain to logging are as follows:

*The objectives of regional reserves and conservation areas, as set out in Schedule 1 of the NPRMA, provide for the harvesting of special species timber. Special species timber is defined within the Forestry (Rebuilding the Forestry Industry) Act 2014 and includes blackwood (*Acacia elanoxylon*), myrtle (*Nothofagus cunninghamii*), celery-top pine (*Phyllocladus aspleniifolius*), sassafras*

Atherosperma moschatum), huon pine (*Lagarostrobos franklinii*), silver wattle (*Acacia dealbata*) **and timber of any other species or timber with particular properties as may be prescribed through the associated regulations. Extraction of special species timbers will be considered through the RAA process and any other assessment and approval process or applicable legislative process.**
Page 81, Draft Plan (emphasis added)

Extraction of special species timber inside regional reserves and conservation areas ... permitted by authority or a licence issued by the Minister in accordance with the NPRMA
Page 74, Draft Plan

1.6. State legislation

‘Special species timber harvesting’ is a purpose of Conservation Areas and Regional Reserves
Page 28, Draft Plan

These provisions would permit logging in parts of the World Heritage Area, including the Styx, Weld and Florentine valleys. These areas are the prime locations of the tallest hardwood trees on Earth, one of the recognized Outstanding Universal Values of the property. They are explicitly identified by the World Heritage Committee in Decision 36 COM 7B.36 paragraph 3.

The rainforest species listed include Gondwanic vegetation (myrtle and celery-top pine); long-lived species (huon pine); and species that occur in tall-eucalypt forests, all of which form part of the Outstanding Universal Value of the Tasmanian Wilderness (Government 1982, 1989, 2010).

Note that ‘any other species’ can also be cut, potentially allowing the logging of giant eucalypts. These provisions appear to be a means of circumventing the World Heritage Committee’s decision not to approve the Australian government’s attempt to rescind 74,000 ha of the Tasmanian Wilderness in June 2014 (UNESCO, World Heritage Committee 2014).

The legislative changes have removed protection from approximately 25,000 ha of the Tasmanian Wilderness in the Great Western Tiers, upper Mersey and Dove River areas (page 19, Draft Plan). These areas – within the World Heritage Area – are now categorized as ‘Future Potential Production Forest Land’ and managed as unallocated crown land. Under the legislative framework that covers this land, these forests are destined to eventually acquire an active logging tenure (EDO 2014). This land, while part of the Tasmanian Wilderness, is not covered under the Draft Plan (page 19).

This 25,000-ha tract of land contributes to Outstanding Universal Value through its tall-eucalypt forests, rainforests, sandstone overhangs (Aboriginal cultural heritage) and karst. Leaving this natural and cultural heritage open to mismanagement, neglect and abuse through logging is contrary to the World Heritage Convention.

It is worth noting that the bodies representing the Tasmanian logging industry have not supported logging inside the World Heritage Area. In fact, mainstream media reported that the peak body representing Tasmania’s timber industry was opposed to the Australian government’s planned excision in 2014. For example, the Sydney Morning Herald quoted the executive director of the Forest Industries Association of Tasmania, Terry Edwards, saying: ‘We don’t support any or all excisions to the World Heritage Area. The 2013 extension was an integral part of our agreement.’

The legislative moves that undo protection from logging are accompanied by a similarly sinister down-grading of one of the key Outstanding Universal Values. In an apparent sleight of hand, the Draft Plan lists the tall-eucalypt forests of the Tasmanian Wilderness as being of local value only (page 45, Draft Plan). By ignoring the recognized Outstanding Universal Value of the forests, the Draft Plan apparently aims to undo their national and international protection from logging.

Areas subject to potential logging and mining (see Section 6 regarding mining) are shown in the table below. Logging and mining will affect the Aboriginal cultural significance of the entire property. **However, specific areas with known or highly likely ‘site-based’ importance for Aboriginal cultural heritage (eg karst areas) are highlighted in yellow.**

Table of Land within the Tasmanian Wilderness World Heritage Area potentially open to logging and/or mining

Reserve / Area	Area (ha)	Description
Central Plateau Conservation Area	94,443	Largely non-forest
Great Western Tiers CA	14,504	Largely high altitude; possibly contains sandstone overhangs of heritage value
Adamsfield CA	5376	Moorland and forest
Picton River CA	4614	Forest and river
North Styx CA	4226	Tall-eucalypts and rainforest; some sandstone overhangs
Great Lake CA	4015	High-altitude area, largely non-forest
Catamaran River CA	3920	Tall-eucalypt forest
Meander CA	1664	Tall-eucalypt, rainforest, waterfalls and some sandstone overhangs
Princess River CA (part)	1116	Forest and waterfalls
Liffey CA	1056	Tall-eucalypts, rainforest and sandstone cliffs
Quamby Bluff CA	945	High-altitude areas, tall-eucalypts, rainforest and sandstone cliffs
Arve Loop CA	944	Tall-eucalypt forest and rainforest
Dove River CA	862	Rainforested gorge
Drys Bluff CA	691	Eucalypts, sandstone cliffs and high-altitude dolerite and
Swift Creek CA	462	Tall-eucalypts and rainforest
Tarraleah CA	347	Tall-eucalypts and rainforest
Styx Tall Trees CA	337	Giant eucalypts and rainforest
Jackeys Creek CA	213	Eucalypts
Mersey River CA	134	Tall-eucalypts and rainforest
Big Tree CA	112	Giant eucalypts and rainforest
Unnamed CA (‘Mayberry Purchase’)	18	Karst
Jones Rivulet CA	64	High-altitude woodland with probable scatters of stone tools
Stringybark CA	33	Tall-eucalypts and rainforest
Southwest CA (vested in Hydro Tas)	1856	Forest and moorland
Unnamed CA (Wet Caves purchase)	95	Karst
Mount Wedge CA	11	Tall-eucalypts and rainforest
Boyd CA	10	Tall-eucalypts and rainforest
St Clair Lagoon CA (vested in Hydro Tas)	15	High-altitude eucalypts
Hydro Tasmania Gordon River Road	196	Tall-eucalypts, moorland and rainforest
Hydro Tasmania Lake Mackenzie	75	High-altitude open country with stone-tool scatters
Styx River RR	11,241	Tall-eucalypts, rainforest
Florentine RR	7469	Tall-eucalypts, rainforest and karst
Weld River RR	4563	Tall-eucalypts, rainforest and karst
Clear Hill RR	2770	Tall-eucalypts, rainforest
Dove River RR	2415	Tall-eucalypts, rainforest
Humboldt Ridge RR	611	Tall-eucalypts and rainforest

Lady Binney RR	379	Tall-eucalypts and rainforest
Borradaile RR	255	Eucalypts
South Weld RR	47	Tall-eucalypts and rainforest
Future Potential Timber Production Land (FPPF Land)	25,000	Eucalypts, rainforest and sandstone overhangs
Total	Approx. 200,000 ha	Eucalypts, rainforest, moorland, sandstone overhangs, karst

CA = Conservation Area; RR = Regional Reserve

Source for Table and figures: Table 1.1, pages 20-23 Draft Plan.

Note that many areas such as the Weld and Florentine valleys contain documented sites of Aboriginal heritage, as do the sandstone overhangs on the Great Western Tiers (part of the FPPF land).

For the first time, therefore, logging inside parts of the Tasmanian Wilderness (up to 200,000 ha) is permitted. This threat applies to all species, including rainforests, Huon pine and giant eucalypts. By contrast, the only extraction of timber permitted in the 1999 Plan (the current plan) was the salvage of Huon pine driftwood from Macquarie Harbour (page 188, 1999 Plan).

Logging of the forests of the Tasmanian Wilderness will destroy Outstanding Universal Value associated with rainforests and tall eucalypts and threaten Aboriginal cultural values. Logging should be explicitly prohibited in the entire Tasmanian Wilderness. Underlying tenure that permits or countenances logging should be upgraded to national-park status.

6. Mineral exploitation (including mining) a permitted activity in over 10% of the Tasmanian Wilderness

Unlike the 1999 Plan, the Draft Plan allows for mining within a significant proportion of the Tasmanian Wilderness. The objectives of Regional Reserves and Conservation Areas include ‘mineral exploration and development’, and the *Mineral Resources Development Act 1995* applies to reserved land (that is, mining leases etc can be granted over reserved land). In addition, the approvals section of the Plan notes that approvals may also be required under other legislation, including the *Mineral Resources Development Act 1995* (page 78, Draft Plan).

Regional Reserves and Conservation Areas cover approximately 172,000 ha (over 10%) of the Tasmanian Wilderness (Table 1.1, p. 20-23, Draft Plan).

The IUCN position statement on mining in World Heritage areas says

The World Heritage Committee, which is the decision-making body of the World Heritage Convention, has long held the position that mineral and oil/gas exploration and exploitation are incompatible with World Heritage status. IUCN’s position is that mineral and oil/gas exploration and exploitation (including associated infrastructure and activities) is incompatible with the Outstanding Universal Value of World Heritage Sites and should not be permitted within these sites. Mineral and oil/gas exploration and exploitation outside World Heritage Sites should not, under any circumstances, have negative impacts on their Outstanding Universal Value.

http://cmsdata.iucn.org/downloads/iucn_advice_note_on_mining_in_wh_sites_final_0605122.pdf.

The 1999 Plan explicitly permitted limited mining activity at only one site (Adamsfield, less than 0.1% of the WHA) within the Tasmanian Wilderness (page 185, 1999 Plan). That particular licence has now expired and is not mentioned within the Draft Plan. It would therefore have been a reasonable expectation that the new plan would prohibit mining throughout the entire property.

Mining should be explicitly prohibited within the Tasmanian Wilderness. This can be done best by upgrading all reserves to national-park status. Alternatively, the Minister, under the *National Parks and Reserves Management Act 2002*, can require the management plan to restrict statutory powers being exercised under other laws. The Minister can therefore prohibit mining by ensuring that the *Mineral Resources Development Act 1995* does not apply to the Tasmanian Wilderness.

7. Wild, remote areas, including wilderness, subjected to intrusive mechanised access and commercial development

The renaming of the Wilderness Zone a ‘remote recreation zone’ makes clear that the thrust of management becomes recreation rather than the conservation of natural and cultural heritage. This trend is also apparent with the general weakening of management prescriptions in the Recreation, Self-Reliant Recreation and Visitor Services Zones (pages 55-57, 73-75). Under the Draft Plan there would be no areas off-limits to commercial tourism, built infrastructure and landings by commercial aircraft.

By changing the prescriptions applying to each zone in this way, the Draft Plan seeks to open significant parts of the Tasmanian Wilderness to mechanized access and other intrusive developments.

The Draft Plan advances contentious proposals for commercial tourism as part of the ‘presentation’ of the World Heritage Area. This is disingenuous. Respectful presentation of the natural and cultural values of the Tasmanian Wilderness is incompatible with intrusive mechanized developments. A distinction must be drawn between proper presentation and intrusive commercial tourism.

In recent times, government policy has pushed the Parks and Wildlife Service towards being the provider of services to the tourism industry. The Draft Plan accentuates this transformation. The Draft Plan appears disturbingly in sync with *Parks 21*, a very industry-focused document drafted between and signed-off by the Parks and Wildlife Service and the Tourism Industry Council of Tasmania without any public consultation whatsoever. The Draft Plan seeks to enshrine a new role for the Parks and Wildlife Service into a statutory instrument. This perverts the purpose of a Parks and Wildlife Service.

The Draft Plan pushes intrusive commercial tourism in the following ways.

Landings of commercial aircraft (float planes and/or helicopters) would be permitted in locations such as Lake Judd, Lake Petrarch, remote lakes on the Central Plateau, Fury Gorge, a western headland of Port Davey, New River Lagoon and Prion Beach (pages 73, 120-122). Several of these locations occur within the current Wilderness Zone and the Self-Reliant Recreation Zone and have been off-limits to aircraft landings under previous management plans.

The above proposals are just the thin edge of the wedge. Further access and infrastructure at the above locations are canvassed (page 122, Draft Plan) and have been proposed via the Tasmanian Government’s ‘Expressions of Interest’ tourism-development process. That process has identified a range of new helicopter landing proposals not even identified in this Draft Plan.

Permitting these commercial landings will bring modern-day clamour to all locations under the flight paths of these aircraft.

Jet skis are permitted on Port Davey and Macquarie Harbour, they should be a prohibited activity. (page 60 Draft Plan).

Under the 1999 Plan, the erection of structures for commercial accommodation and other tourism development was restricted to areas on the fringe of the World Heritage property or within Visitor Services zones. The Draft Plan aims to undo these protections by allowing commercial development within all zones.



Lake Judd, a spectacular glacial lake in the Tasmanian Wilderness. Dismantling of wilderness protection proposed in the Draft Plan will allow float-plane landings in this confined basin, bringing mechanized intrusion to this remote location. Photo by Rob Blakers.

It specifically allows commercial huts on the South Coast track and the development of further commercial accommodation at Cradle Mountain (pages 117, 137, Draft Plan), an area arguably already at maximum carrying capacity. Zoning changes in the Port Davey area signal the government's intention for developments in this remote, special region (Maps 15, 16, 17, pages 178-180).

Such developments also bring the threat of weeds and pathogens. The impact of these changes is to weaken the commitment to nature conservation and threaten the ecological integrity of large tracts of the Tasmanian Wilderness that have previously been protected by both management prescription and physical remoteness.

The criteria by which proposals for commercial tourism within the World Heritage Area are to be assessed have not been clearly spelt out.

Meanwhile, the Draft Plan has ignored the possibilities of increased visitation to the Styx valley, home of the world's tallest hardwoods and a place that could become a Southern Hemisphere counterpart to the Redwood National Park of California. A new Management Plan should canvass a Visitor Services node in the Styx valley in the vicinity of the Big Tree Conservation Area.

The proposed and foreshadowed increases in commercial tourism and aircraft landings threaten the ecological integrity of places of Outstanding Universal Value. Current

restrictions on aircraft landings and built commercial accommodation should be retained and no new permanent structures for commercial tourism should be erected outside of the Visitor Services Zones. Amendments to the boundary of the Wilderness / Remote Recreation Zone made to accommodate possible commercial tourism developments should be rescinded and the 1999 boundary restored (for the pre-2013 parts of the property).

Jet skis should be prohibited across the entire property.

The Plan should spell out the criteria by which proposed commercial tourism developments will be assessed and approved, and a framework for protecting the property from the cumulative impact of such proposals.

The Plan should draw a distinction between the respectful ‘presentation’ (involving education and interpretation) required by the Convention and the contentious, intrusive, commercial tourism developments promoted by the Draft Plan.

8. Statutory means of protecting the Tasmanian Wilderness are weakened or sidelined

The Draft Plan outlines means by which the statutory status of the final plan will be undermined and by which the Parks and Wildlife Service, the primary management body, will be weakened.

For decades, management of the Tasmanian Wilderness has been carried out by the Tasmanian Parks and Wildlife Service (PWS), an organization embodying great dedication and professionalism. The Draft Plan seeks to sideline this expertise, transferring key decision-making roles to other bodies.

A Tourism Master Plan would determine sustainable use, commercial opportunities, access, staff training, joint tourism ventures, presentation and investments. An Assessment Panel appointed by the Minister will recommend which tourism developments proceed within the Tasmanian Wilderness. A Cultural Business Unit within DPIPWE will determine naming, cultural practices, policy development and planning as they pertain to cultural heritage, aspects of fire policy, and the advancement of joint management arrangements.

Together, these bodies have the potential to shift the focus of the staff of the PWS to facilitators of tourism and economic activity. Key policy-making will be taken out of the hands of the PWS. Decision-making will become unnecessarily complicated, creating paralysis when it comes to dealing with severe on-the-ground threats relating to biosecurity, access, fire and enforcement. These come on top of the systematic under-funding and disempowerment of the PWS by government.

The World Heritage Management Plan itself would be undermined by the power of these other instruments.

The Parks and Wildlife service's role in protecting and managing natural and cultural values was earlier compromised in a pact struck between the PWS and the Tourism Industry Council (TICT) of Tasmania titled ‘Parks21’. This agreement, developed by the Government with no public consultation, commits the PWS to (*inter alia*):

- Focus its efforts on enhanced tourism focus, sustainable experience delivery, and enterprise and economic activity;
- Work with industry to further develop [the PWS] as a leading nature-based tourism business
- Invite TICT representatives to attend [the PWS] annual staff conference

- Attract private capital investment in tourism activities and infrastructure in and around Crown lands, parks and reserves.
- Accept TICTs leadership in staff development.

Clearly the *Parks21* pact has arisen from the same Government policy agenda of promoting commercial interests over heritage protection as underlies the Draft Plan, and has serious implications for the property's management.

The relevant parts of the Draft Plan are as follows:

7.1 Tourism Master Plan

Management Action:

– A *Tourism Master Plan for the TWWHA* will be developed in consultation with the tourism industry, Tasmanian Aboriginal people and other key stakeholders. The plan will be released for public comment. The master plan will include the following elements:

- Development of a coherent marketing strategy for the TWWHA that integrates promotion of the area and its values with other statewide and regional strategies;
- Examination of current and future visitor expectations, including demand analysis;
- Aboriginal cultural presentation;
- Natural values presentation and conservation partnerships;
- Historic heritage;
- Prioritisation of investment in facilities and experiences;
- Sustainable use;
- Commercial opportunities;
- Opportunities for management support through tourism;
- Strategic data collection and analysis;
- Access;
- Staff and operator training and accreditation;
- Recreation opportunities and a recreation demand analysis; and
- Strategic partnerships.

Pages 113-115, 140, Draft Plan

Determining ‘sustainable use’, ‘commercial opportunities’, ‘access’ and ‘recreation opportunities’ is a mammoth area of power and responsibility. This is clearly designed to prioritise tourism development as an objective of management at the expense of conservation of natural and cultural heritage. The provisions and power of the Tourism Master Plan could therefore override the actual Management Plan itself as well the protection of Outstanding Universal Value.

7.2. Expressions-of-Interest (EOI) Assessment Process and Panel

This is a process designed to encourage commercial tourism development inside the Tasmanian Wilderness.

Stage One of the EOI process calls for proposals for tourism development inside reserves, followed by an initial assessment by an Assessment Panel which provides recommendations to the Minister who can seek a detailed proposal. Stage Two consists of consideration of the detailed proposal, again by the Panel, which can then recommend the go-ahead to Minister for lease or license negotiations. (pages 77-78, Draft Plan).

An enormous amount of power resides in the Panel, which appears to have the ability to override concerns about Outstanding Universal Values.

It should be noted that the Tasmanian Minister for National Parks has already compromised this process by giving a second chance to 13 proposals rejected by his panel (see section 7 below).

7.3. Cultural Business Unit

The CBU will also progress a dual name for the TWWHA and the nomination of the TWWHA as a Cultural Landscape under the World Heritage Convention.

Page 3, Executive Summary, Draft Plan

The CBU's main functions will be:

- Provision of advice to DPIPWE about the management of Aboriginal cultural values in the TWWHA;*
- Policy development and planning in the TWWHA;*
- Facilitation of research, monitoring and evaluation in the TWWHA;*
- Monitoring and evaluation;*
- Coordination and facilitation of engagement with Aboriginal people, and advancement of joint management arrangements;*
- Facilitation of a Reconnection to Country program and the interpretation and promotion of cultural tourism in the TWWHA; and*
- Implementation of the relevant actions and policies in the Management Plan, in consultation with Aboriginal people, including a biennial review and report on progress towards KDOs.*

Pages 84-85, Draft Plan

While some of these objectives are desirable, the hostile attitude of the government to wilderness and the natural environment arouses suspicion that this Unit could act as a wedge between Aboriginal people and the conservation movement. **The CBU, as proposed, would have a policy-making role for the Tasmanian Wilderness rivaling that of the Parks and Wildlife Service. This has the potential to set up paralyzing administrative conflicts over crucial issues such as management of fire, tracks and access.**

Together, the provisions and powers of the Tourism Master Plan, the Expressions of Interest Panel and the Cultural Business Unit have the potential to sideline the Parks and Wildlife Service and to override the management plan itself.

To rectify this situation, the central role of the Parks and Wildlife Service as management agency should be explicitly recognized and the funding to the service should be substantially increased.

The statutory management plan for the Tasmanian Wilderness must remain the key document. Responsibilities should not be devolved to other administrative instruments.

9. A confused fire-management regime

The Draft Plan acknowledges that the Tasmanian Wilderness is in jeopardy from climate change and fire:

The natural values of the TWWHA have not faced greater or more rapid changes for thousands of years. Climate change, fire and incursions by invasive species are among the major threats to the area's natural values and processes.

Pages 99-101, Draft Plan

The Draft Plan also refers to the sharply double-edged character of fire in the Tasmanian Wilderness: *Fire is considered one of the greatest threats to values that contribute to the Outstanding Universal Value of the property, while also being one of the most critical elements for the maintenance of others.*

Page 101, Draft Plan

These statements clearly describe the challenge for land managers in applying appropriate fire regimes to a compact diversity of landscapes, from areas significantly influenced by traditional (pre-1830) Aboriginal burning to tracts of rainforest and high-altitude vegetation where a single fire can have permanently devastating consequences. Yet other parts of the Draft Plan claim that fire has 'shaped' the entire Tasmanian Wilderness, ignoring the fact that many areas have been shaped by the absence of fire.

Contradictions are abundant. The Draft Plan says there has been a considerable decline in arson (page 157); elsewhere it says that monitoring has revealed an increasing incidence in illegal fires (page 127). The Draft Plan says there has been a major increase in the area burnt by lightning strikes (page 157) and that fire frequency, flammability and fire seasons will increase (page 102); elsewhere it says 'there is a clear need to reintroduce a significantly greater level of fire back into the landscape' (page 155).

The Tasmanian Wilderness cannot afford to have such confusion over this critical issue. The massive wild fires of 2008 and 2013, which burnt broadscale areas of buttongrass as well as sensitive forest (including rainforest and Huon pine), should serve as a warning to land managers and the public.

Fire, as well as being an important tool of management, is also one of the biggest single threats to Outstanding Universal Value. A precautionary approach to the use and treatment of fire is absolutely essential. The Management Plan should explicitly aim to protect rainforest and high-altitude vegetation (such as King Billy and pencil pines) from wildfires.

The Management Plan should explain far more clearly the rationale and criteria applying to the varying forms of fire management, including suppression policies, prescribed burning and Aboriginal burning.

10. Management Planning Process Already Compromised

Part of the Management Plan process is already compromised. With respect to submissions from the public, the Tasmanian government has said:

...the draft plan may not be amended if a representation:

- *contradicts planning proposals for which there is widespread support;*
- *conflicts with government policy;*

- *is contrary to the intention of relevant legislation or national or international conventions and agreements;*
- *is among widely divergent viewpoints better handled or balanced by the proposed approach to policies or actions;*
- *addresses issues beyond the scope of the plan; or*
- *ignores or contradicts relevant established facts.*

<http://dpi.pwe.tas.gov.au/conservation/tasmanian-wilderness-world-heritage-area/new-tasmanian-wilderness-world-heritage-area-management-plan>

Protection of Outstanding Universal Value is therefore potentially compromised by ‘government policy’ where those policies support new tourism development, logging and mining. The Wilderness Society, ET and ACF note that the Draft Plan gives no link or reference that defines government policy.

The Tasmanian government claims that its Assessment Panel will strike the right balance in evaluating proposals for tourism developments inside conservation reserves. However, the Tasmanian Minister for National Parks appears loathe to reject even those developments that have not been approved to the second stage, as indicated in the following media report:

<http://www.themercury.com.au/news/tasmania/rejected-parks-bids-get-second-chance/story-fnj4f7k1-1227208381305>

Submissions should be assessed on their merits according to their pertinence to the natural and cultural values of the Tasmanian Wilderness and not according to their consistency with government policy or 'planning proposals'.

11. Other Management Issues

Illegal tracks

Egregious examples of illegal construction and use of tracks in the Tasmanian Wilderness by recreationalists is known to PWS but nothing has been done to address the problem. Examples include an illegal quad-bike track in the Huon valley and an illegal walking track into the Denison River from the Gordon Impoundment. PWS must tackle these illegal acts or be seen to condone vandalism of the Tasmanian Wilderness.

Rehabilitation of natural heritage

Rehabilitation of key sites must be prioritized. This includes the karst system in the Huon that has been damaged by pre-2002 forestry activities. The effective re-opening of tracks to the Raglan range caused by fighting fires in the area in early 2013 should be rectified by again rehabilitating these tracks. Redundant, intrusive forestry roads such as the one bulldozed in 2009 into the upper Florentine should be closed and rehabilitated. Proposals to rehabilitate the former Lake Pedder should be forwarded to Hydro Tasmania for serious consideration and publication of the associated issues, including the costs and benefits of rehabilitation and the costs and benefits of restoring the dams once their use-by date is reached.

The Draft Plan fails to specify whether or how previously logged sites (approximately 7000 ha within the 2013 minor modification) will be rehabilitated. It is likely that most such sites will require minimal intervention, however an audit of these previously logged coupes should be carried out.

Areas within the 2013 minor modification that occur within coupes that were clearfelled after 1960 require a Special Management Overlay. There are currently at least 18 such coupes where regeneration has failed to meet Forestry Tasmania's target ecological stocking rate (see the attached map). Additional coupes have reached ecological stocking rate, but should be given special management overlay to monitor restoration. Additional restoration activities such as rehabilitation of roads and landings within the coupes is desirable.

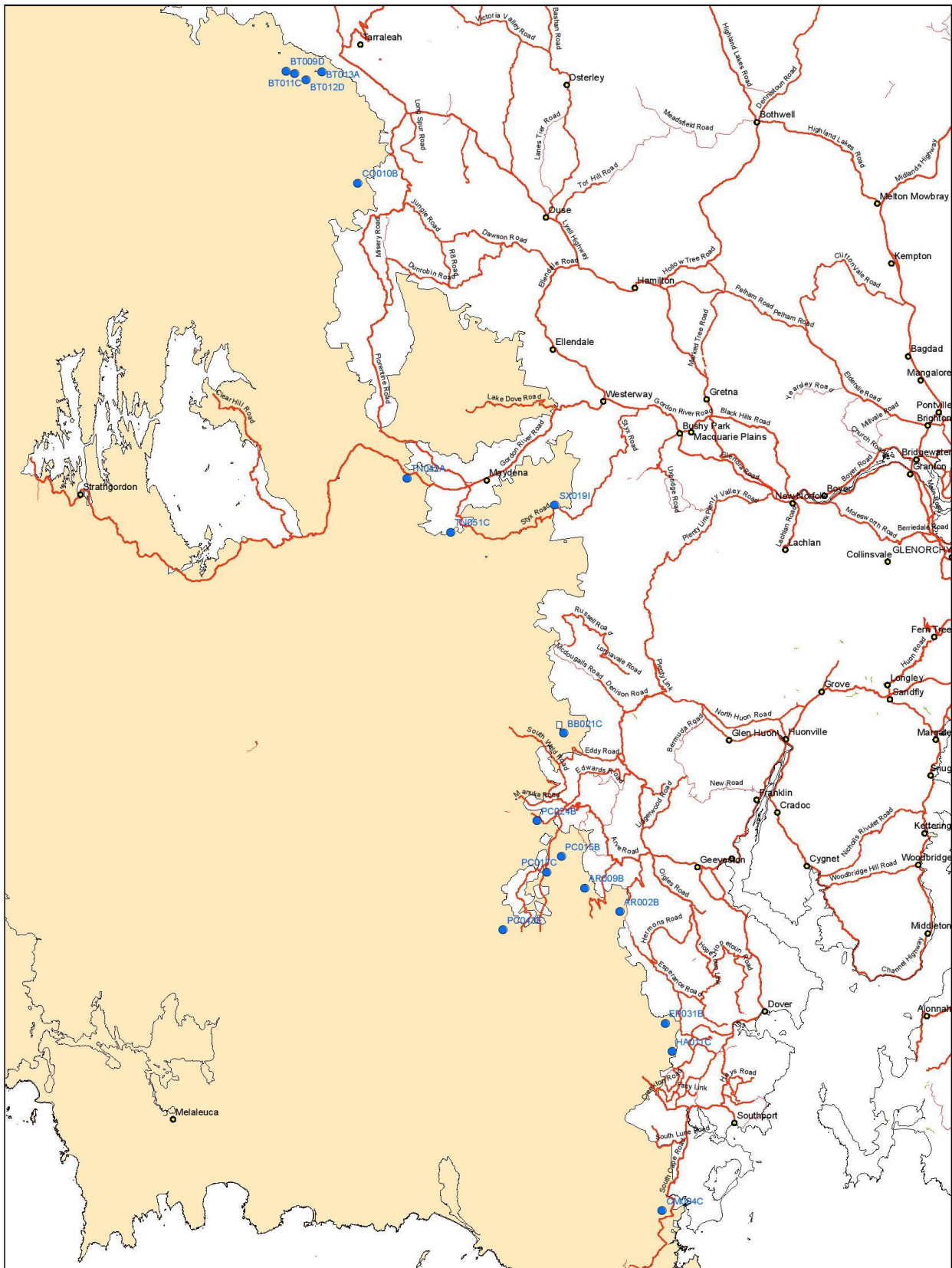
Rehabilitation prescriptions as per previous the 1999 Plan (p115) should be adopted, namely:

- *Wherever possible use local provenance plant species and local soil for revegetation work.*
- *When rehabilitating , import only soil material that is pathogen free and physically and chemically compatible with the area it will be introduced into.*
- *Rehabilitation practices will conform to, or exceed the minimum standards for rehabilitation in the Forest Practices Code and the Department of Primary Industries, Water and Environment Rehabilitation Guidelines.*

The provisions in the Draft Plan applying to forestry roads (in particular in the 2013 minor-modification area) are sensible at face value. However, it should be explicit that all logging roads that merely provide access to previously-logged coupes should be closed and rehabilitated. Roads that are essential for bee-keeping, sustainable tourism and fire management should be maintained.

Within the World Heritage Area are a number of enclaves of publicly-owned forestry land (State forest) that were excluded from the 2013 minor modification because they were part of the transitional arrangements. These coupes should be included within the World Heritage Area and above management overlay.

Map. Logged coupes within the World Heritage Area requiring rehabilitation



Location of Coupes in the TWWHA
Requiring Restoration at June 2013

Legend

- Coupes
- TWWHA

12. Conclusions and Recommendations

The Draft Plan fails to meet the requirements of a Management Plan for a World Heritage Area because it fails to properly identify Outstanding Universal Values and conditions of integrity. Considerations such as recreation, commercial tourism and government policy are placed above the protection of Outstanding Universal Value. The Management Plan itself can be overridden by a Tourism Master Plan and a tourism-development Assessment Panel.

The Draft Plan should be withdrawn because it fails to meet the requirements of the Australian World Heritage Management Principles, the World Heritage Convention and the World Heritage Operational Guidelines (clauses 96, 98 and 101). A new Draft Management Plan should be prepared following a more rigorous attempt at consultation with the public.

The Tasmanian and Australian governments must ensure that a new draft management plan will:

- Apply to all areas of public land within the Tasmanian Wilderness World Heritage Area;
- Provide a comprehensive and structured description of Outstanding Universal Value and conditions of integrity that relates relevant characteristics of the Tasmanian Wilderness to the seven formal World Heritage criteria satisfied by the Tasmanian Wilderness;
- Reinstate the objective of management of the 1999 Plan to ‘identify, address and more fully understand’ the natural and cultural values of the property;
- Incorporate the latest information on values, including that contained in the reports on geodiversity (Sharples 2003) and floristic values (Balmer J. 2004);
- Accelerate efforts to carry out a study of the Aboriginal cultural heritage of the entire property, with annual updates to the World Heritage Committee, to ensure that these values are properly identified and protected;
- Acknowledge and face up to past failures of management (as with the meromictic lakes on the Gordon River);
- Explicitly recognise the importance of wilderness to the character, management and integrity of the Tasmanian Wilderness and abandon moves to drop the term ‘wilderness’ from the name of the property;
- Reinstate the Wilderness Zone of management (explicitly by name);
- Reinstate the boundary of the Wilderness Zone within the pre-2013 boundary of the property and maintain the Wilderness Zone within the 2013 minor-modification areas (apart from those areas covered by the rehabilitation management overlay referred to below);
- Reinstate and strengthen the protections for remoteness and naturalness for each of the four zones as contained in the 1999 Plan;
- Explicitly recognize protection of wilderness as the primary means by which the natural and cultural values of the Tasmanian Wilderness are maintained;
- Clearly spell out the criteria by which proposals for commercial tourism development will be assessed and/or approved and clearly establish a framework by which the World Heritage Area will be protected from the cumulative impacts of such developments;
- Draw a distinction between the ‘presentation’ required by the Convention (involving interpretation and education) and intrusive, contentious commercial tourism developments that add little to people’s comprehension of Outstanding Universal Value;
- Encourage ecotourism in the Styx Valley through establishment of a Visitor Services zone in the vicinity of the Big Tree Conservation Area;
- Explicitly prohibit logging and mining in all parts of the Tasmanian Wilderness;
- Upgrade the status of all public land within the Tasmanian Wilderness (including Regional Reserves, Conservation Areas and Future Potential Production Forest), to national park or equivalent;
- Reinstate restrictions on aircraft landing and flight paths and disallow landings at Lake Judd, Lake Petrarch, the Frankland Range, Prion Beach, New River Lagoon, Lake Ina, Lake

Olive, Travellers Rest Lagoon, Lake Rotuli, Port Davey, Fury Gorge, the Walls of Jerusalem and other destinations that are secluded and tranquil;

- Implement restrictions on motorized boat access that take account of monitoring of erosion and other impacts;
- Develop a more coherent fire policy that explicitly states the requirement to protect fire-sensitive vegetation (such as King Billy pine, Huon pine, pencil pine, deciduous beech and rainforest) from wildfire;
- Append a table listing major fire events within the Tasmanian Wilderness since the inception of the World Heritage Listing in 1982. Information to include area burnt, ignition cause, vegetation-types burnt, and month and year of ignition;
- Explicitly adopt a precautionary approach to the use and treatment of fire in the Tasmanian Wilderness and adjacent areas;
- Describe clearly the rationale and criteria applying to the choice of varying treatments of fire, including suppression, prescribed burning and Aboriginal burning;
- Recognise the preeminent role of and substantially increase the funding to the Parks and Wildlife Service in managing the Tasmanian Wilderness;
- Maintain the statutory management plan as the primary instrument governing policy, decisions and actions within the Tasmanian Wilderness (rather than devolving key decisions to other instruments such as a Tourism Master Plan or Expressions of Interest process);
- Explicitly ensure that developments proposed for the Tasmanian Wilderness will be subject to the Land Use Planning and Approvals Act (LUPAA);
- Institute protection of Outstanding Universal Value, integrity and wilderness as overriding criteria in any assessments of commercial tourism proposals and other developments for the Tasmanian Wilderness;
- Address the construction and use of illegal tracks within the Tasmanian Wilderness by closing them;
- Create a specific Management Overlay covering logging coupes within the 2013 minor-modification area that were clearfelled prior to inclusion in the property so that proper rehabilitation treatment can be identified and implemented;
- Enclaves of State forest within the World Heritage Area covering logging coupes that were part of the 2013 transition arrangements should be incorporated into the property and become part of the above management overlay;
- Rehabilitate key sites of special sensitivity (such as in karst landscapes);
- Provide better consultation with stakeholders – including environment groups which have made long-standing contributions to World Heritage in Tasmania;
- Assess all public submissions on their merits, with protection of Outstanding Universal Value (rather than compliance with government policy) being the overriding concern.

Appendix

Direct comparisons of the 2014 Draft Plan with the 1999 Management Plan

This table contains only those instances where direct and simple comparisons between the plans are possible.

2014 Draft Management Plan	1999 Management Plan
Scope of the Plan	
<p>(The Management Plan) does not apply to freehold land subject to a conservation covenant under the NCA, freehold land or vested land held by Hydro Tasmania, including where it is classified as FPPFL, or any other freehold land. (The Management Plan) does not apply to Permanent Timber Production Zone Land or land vested in the Aboriginal Land Council of Tasmania. (39,020 ha) PWS will establish a TWWHA Land Managers Group and, where appropriate Memoranda of Understanding. Page 151 (Emphasis added) Tables, maps pages 20-23</p>	<p>Approximately 1200 ha of Aboriginal land and HEC impoundment within the WHA not covered by the 1999 plan.</p>
Vision and Objectives	
<p>1999 objectives 2 and 3 (as per column right) have been omitted from the vision section of the Draft Plan. This represents a lessening of Government commitment to upholding the World Heritage Convention.</p>	<p><i>2. To identify and more fully understand the WH and other natural and cultural values of the WHA, their significance and management requirements.</i></p> <p><i>3. To identify and take appropriate protective action to prevent, mitigate or manage within acceptable limits, adverse impacts on, or threats to, the World Heritage and other natural and cultural values of the WHA.</i> Page 30, 1999 Plan</p>
<p>Management objectives</p> <p>Cultural values:</p> <p><i>To develop and implement a joint management arrangement that ensures that the strategies and actions for identification, protection, conservation and presentation of the World Heritage and other values of the TWWHA are developed in partnership with Tasmanian Aboriginal people.</i> Page 33</p> <p><i>The TWWHA is nominated for consideration by the World Heritage Committee for listing as an Aboriginal Cultural Landscape under the World Heritage Convention as a foundation for the management of its cultural values.</i> Page 33</p> <p>Natural values: <i>To identify, protect, conserve and restore natural</i></p>	<p>Management objectives</p> <p>Emphases added</p> <p><i>To conserve the values of the WHA in a manner consistent with their natural and cultural significance, and where appropriate, feasible and sustainable, to rehabilitate or restore degraded values. In particular to:</i></p> <p><i>4.6 maintain or restore natural diversity and processes;</i></p> <p><i>4.7 maintain or enhance wilderness quality;</i></p> <p><i>4.8 maintain or enhance environmental quality;</i></p> <p><i>4.9 maintain or enhance landscape quality;</i></p> <p><i>4.10 protect and conserve historic heritage and Aboriginal heritage (in partnership with the Aboriginal community).</i> Page 30, 1999 Plan</p> <p>Similar goals in 1992 plan including: <i>Maintain and enhance wilderness quality</i></p>

<p><i>biological and geological diversity and processes in the TWWHA.</i> Page 33 (as per leaked draft)</p> <p><i>To protect and conserve the natural landscapes of the TWWHA, in particular areas of exceptional natural beauty, and aesthetic and cultural importance.</i> Page 33</p> <p>Obvious jettisoning of the word and concept of wilderness in 2015 compared with 1999. The assertion that the whole of the Tasmanian Wilderness is a cultural landscape is not substantiated by reference to internationally accepted definitions of the term.</p> <p>Presentation <i>To provide a diversity of visitor experiences in a manner that is consistent with the conservation of natural and cultural values.</i></p> <p>Community Engagement <i>To promote and facilitate the role of the TWWHA as an integral and valued component of the social, environmental and economic wellbeing of the international, national and Tasmanian communities, and to involve these communities in its management.</i></p> <p>Monitoring and Evaluation <i>To support the delivery of an informed, effective and transparent adaptive management regime for the TWWHA.</i> Page 33</p>	<p>Page 17</p>
<p>Naming and Wilderness</p>	
<p><i>The use of the term ‘wilderness’ to describe the TWWHA is problematic for Aboriginal people. They believe the term wrongly implies that the TWWHA is a landscape empty of human culture.</i> Pages 90, 91</p> <p><i>Management Actions</i> <i>Renominate the TWWHA as Cultural Landscape under the WH Convention. Timeline is ‘within 5 years’</i> Page 94</p> <p><i>Following the protocols laid out in the Tasmanian Government’s Aboriginal and Dual Naming Policy, establish the dual naming of the TWWA and seek re-naming of the property through the WH Committee.</i> Page 92</p> <p>– <i>Dual name gazetted within 3 years; renominate dual name of proper ty within five years.</i></p> <p>The Draft Plan explicitly acknowledges that the term ‘wilderness’ as used in previous plans is defined by</p>	<p>Value of wilderness as a defining characteristic of the TWWHA is affirmed in the 1999 and 1992 plans:</p> <p><i>A wilderness area is an area that is:</i></p> <ul style="list-style-type: none"> - <i>of sufficient size to enable the long-term protection of its natural systems and biological diversity;</i> - <i>substantially undisturbed by colonial and modern technological society;</i> - <i>remote at its core from points of mechanized access and other evidence of colonial and modern technological society.</i> <p>Page 92, 1999 plan</p> <p><i>The wilderness areas encompassing these values is recognized as being of such outstanding international significance that its perpetuation is of concern to all humanity.</i> Page 13, 1992 plan.</p> <p><i>For the modern Australian community perhaps the most significant cultural value of the Tasmanian wilderness is as a place for reflection, a source of inspiration and a symbol of the idea of untouched nature. In these times of widespread environmental</i></p>

<p>remoteness from modern or colonial disturbance and does not imply lack of previous occupation by indigenous peoples.</p>	<p><i>degradation, for many people there is great value in simply knowing that a large area of temperate wilderness still exists in Australia.</i> Page 14, 1992 plan; page 25, 1999 plan</p> <p>Values of wilderness described in detail. Page 93, 1999 plan</p> <p><i>The wilderness quality of the WHA has, until relatively recently, safeguarded its special natural and cultural features.</i> Page 93</p>
<p>Statement of Outstanding Universal Values</p>	
<p>Statement of OUVs to be considered by World Heritage Committee in June 2015. Statement to be published by federal Department of Environment February 2015. This did not occur. Page 25</p>	
<p>Natural Values</p>	
<p><i>The TWWHA is one of the largest temperate natural areas in the southern hemisphere.</i> Page 17 Avoidance of the word ‘wilderness’ persists in the official draft plan, despite importance of wilderness to the area’s identity and management as outlined in previous plans.</p> <p>World Heritage criteria (Outstanding Universal Value) are not listed. This is a serious flaw in the Plan that undermines determination of the objectives of management and casts a shadow over a large number of management actions.</p> <p>Instead, there is an unstructured description that does not present the values in the context of Outstanding Universal Values. It does not appear to be informed by major reports on values (Balmer et al 2004; Sharples 2003) that have been prepared since the last management plan and which are not listed in the Bibliography. There appears to be a willful disregard of work done on natural values since the last plan was finalized.</p> <p>Tall forests, giant trees and the Styx valley are mentioned – but under a section about the WHA’s importance in a <u>Tasmanian</u> context! (page 45). This is a very serious issue indicating an intention not to preserve this OUV and an agenda of logging.</p>	<p><i>On a global scale, the Tasmanian WHA can best be compared with two other temperate wilderness areas in the Southern Hemisphere – South West New Zealand and Los Glaciares in Argentina (both World Heritage sites).</i> Page 3, 1992 plan; page 3; page 22, 1999 plan.</p> <p>World Heritage criteria listed. Page 22, 1999 plan</p> <p>Inspiring descriptions of natural and cultural values. Pages 23-24, 1999 plan</p> <p><i>The outstanding recreational value of the WHA is the opportunity it provides for experiencing wilderness.</i> Page 25, 1999 plan</p>
<p>Zoning</p>	
<p>Four Management Zones: Visitor Services, Recreation, Self Reliant Recreation and Remote Recreation Page 55</p>	<p>Four Management Zones: Visitor Services, Recreation, Self Reliant Recreation and Wilderness Page 56, 1999 plan</p> <p>Strong management prescriptions applied to</p>

<p><i>The zoning system is not intended to be a basis for restricting Aboriginal cultural practices.</i> Page 55 Such practices must be rigorously defined.</p> <p>Significant weakening of management prescriptions in the Recreation, Self-Reliant Recreation and Natural Zones compared with 1999 counterparts. Commercial tourism and accommodation for commercial tourism are now permitted in all four zones. Pages 73-75</p> <p><u>Visitor Services Zone</u> Following sites added to Visitor Services Zones: - Bernacchi Lodge (deteriorating ex - Antarctic Division building on the Plateau); - Abbotts Lookout (the rapidly deteriorating Eagle's Eyrie, built with questionable justification by FT in a position with difficulties of access); - Maatsuyker Island. - Russell Falls and Lake Dobson in the Mt Field NP (logical) Page 57 Opportunity in the Styx valley overlooked – part of generally hostile attitude to tall forests.</p> <p><u>Remote Recreation Zone</u> <i>In fact, locations within the Remote Recreation Zone may be viewed by Aboriginal people as places that provide opportunities for cultural practice, particularly the use of fire</i> Page 59 Such practices must be rigorously defined, particularly in relation to fire. There are massive challenges to be faced in any form of prescribed burning at a time of climate change and in the vicinity of fire-sensitive vegetation.</p> <p><u>Recreation Zone</u> <i>Opportunities for recreational four-wheel-drive usage, horse riding and mountain biking are also available.</i> Page 58 Dog walking – permitted within Recreation Zone on roads and vehicle tracks in regional reserves, nature recreation areas and conservation areas (not including Central Plateau CA). Pages 73-75 Horse riding – <i>Within conservation areas, nature recreation areas and regional reserves, permitted on roads. Remaining areas within designated horseriding areas or by authority</i> Page 74</p>	<p>Wilderness and Self-Reliant Recreation Zones.</p> <p><u>Visitor Services Zone</u> Major facilities for recreation and presentation; limited new short walking tracks; major mechanized access points; major management inputs; special events permitted. Page 57</p> <p><u>Wilderness Zone</u> No new facilities, walking tracks, mechanized access (except for mgt purposes), structures, promotion, special events or aircraft landings. Page 57</p> <p><u>Recreation Zone</u> Limited facilities for recreation, limited new walking tracks, access promoted, special events permitted. Horse-riding permitted in parts of Central Plateau CA strictly constrained. Pages 57, 148-151 Dogs not permitted inside national parks and other state reserves except as per hunting-zone and hunting-access provisions or in Farm Cove Game Reserve. Page 151</p>
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<p>Public huts and associated infrastructure can be maintained through partnership agreement; new huts permitted within Visitors Zone and Recreation Zone</p> <p>4WDs and ATVs - <i>Permitted in designated vehicle areas (of recreation zone). Authority required for Mt McCall Rd and Adamsfield Conservation Areas (registered vehicles only)</i> Page 75</p> <p><u>Self-reliant Recreation Zone</u> Prescriptions weakened from the 1999 Plan to allow aircraft landings and commercial tourism development.</p>	<p><u>Self-reliant Recreation Zone</u> No new facilities except for environment protection; no new walking tracks; mechanized access strictly limited; no new structures; access not promoted. Page 57</p>
<p>Remoteness as a management tool</p> <p><i>Protection of these expanses remains a management priority and the plan contains a number of actions and provisions intended to achieve that outcome... Consideration of physical remoteness will remain an important management consideration in the use of the TWWHA, as it is highly relevant to the visitor experience and the economics and effectiveness of conservation measures.</i> Pages 159-160</p> <p>Draft Plan tries to have it both ways, claiming to protect the key ingredients of wilderness, such as remoteness, while jettisoning the concept of wilderness itself. But faith in this approach is difficult given the hostility to the natural environment, wilderness and remoteness demonstrated in other parts of the plan. Dumping the ‘metric’ means that qualities such as remoteness will be gradually, or systematically, eroded. Key management prescriptions pertaining to the Remote Recreation Zone are watered down in a way that is detrimental to the key qualities of wilderness (see below – sections re aircraft landings and boating).</p>	<p>Wilderness as a management tool</p> <p><i>Maintenance and enhancement of wilderness quality therefore serves two important functions:</i></p> <ul style="list-style-type: none"> • <i>it is the best overall management strategy for preserving the natural and cultural environment of the WHA in perpetuity, and</i> • <i>it preserves an irreplaceable attraction and source of inspiration for people everywhere.</i> <p>Page 20, 1992 plan</p> <p><i>Wilderness Zone Objectives</i></p> <ul style="list-style-type: none"> • <i>To allow natural processes to operate with minimal interference</i> • <i>To retain a challenging unmodified natural setting that suitably experienced and equipped people can visit for wilderness recreation and scientific purposes</i> • <i>To use wilderness as a primary means of managing, protecting and conserving World Heritage and other natural and cultural values.</i> <p>Page 57, 1999 plan</p>
<p>Motorised Access</p>	
<p>Aircraft (mostly pages 120-122)</p> <p><i>The presence of aircraft may intrude on the often hard-won experiences of isolation and solitude that are sought by ground-based travellers to remote areas. Additionally, signature experiences near visitor service zones of popular areas may be exposed to the adverse effects of low-flying aircraft.</i> page 121 Nevertheless, all four zones now allow aircraft landings at designated sites; commercial tourism development;</p> <p>New permitted landing sites (float plane and/or</p>	<p>Aircraft</p> <p><i>Investigate three additional landing sites within WHA outside the Wilderness Zone</i></p> <p><i>No landings in Wilderness Zone.</i> (Includes several locations permitted in the 2014 draft plan such as Frankland Range, Lake Judd and New River Lagoon) Page 56, 1999 plan</p> <p>Float planes permitted on Gordon River and Macquarie Harbour under licensed conditions. Page 133, 1999 plan</p>

<p>helicopter):</p> <ul style="list-style-type: none"> - Lakes Ina, Rotuli, Olive and Travellers Rest Lagoon on the Central Plateau; - Lake Judd, Frankland Range, Prion Beach, North Head (Port Davey), Maatsuyker Is., Lake Pedder, New River Lagoon in SWNP; - Cradle Mt – L. St Clair NP: Lake St Clair, Lake Petrarch and Fury Gorge; - Walls of Jerusalem NP. <p>Pages 120-122 No change from the leaked draft.</p> <p>No explicit prohibition of landings within the Remote Recreation Zone (as apply in the Wilderness Zone in the 1999 plan). Page 73</p>	<p>While not explicitly prohibiting landings within the Self-Reliant Recreation and Recreation Zones, the 1999 plan permits landings only under certain conditions and subject to permit. Significant restrictions regarding over-flights applied. Float planes only on Macquarie Harbour, Port Davey, parts of Bathurst Harbour, Lake Pedder, Lake St Clair and parts of Gordon River, subject to strict conditions. Page 135, 1999 plans</p>
<p>Motorised Boating (page 123)</p> <p>Brief section permitting motorized boating in the following locations without the detailed restriction described in 1999:</p> <p>Southwest NP: Port Davey / Bathurst Harbour, Lake Pedder West coast: Macquarie Harbour and Gordon River Cradle Mountain - Lake St Clair NP: Lake St Clair Central Plateau: Lake Ada, Pillans and Julian Lakes, Double Lagoon, Lake Fergus</p> <p><i>From February 2004 to March 2013, estuarine banks near the river mouth were found to have eroded at double the average rate of that expected from sea-level rise alone, with an increasing trend evident. Erosion rates are declining in the zones above where commercial vessels operate.</i> Page 125</p> <p>Acknowledgment that motorized boating, even subject to controls, still erodes the riverbanks. Yet this finding is ignored by the provision of lax management prescriptions.</p> <p>Draft does not contain the explicit prohibitions of the 1999 plan pertaining to the Franklin River.</p> <p>Jet skis permitted in parts of WHA <i>Personal powered watercraft (commonly referred to as 'jet skis') are restricted to Port Davey, seaward of Turnbull Head and Carvers Point, and Macquarie Harbour excluding the Gordon River.</i> Pages 60, 74</p> <p>Apart from the above, the prescriptions regarding motorized boating appear the same as for 1999.</p>	<p>Motorised Boating</p> <p>Preamble described environmental issues associated with motorized boating. Pages 136-137</p> <p>Motorised boating on Gordon River subject to significant restrictions re wakes, according to Lower Gordon River Recreation Zone plan. Page 137</p> <p>Notes on anchorage and speed restrictions for Bathurst Harbour / Port Davey. Pages 137-138, 60-61</p>
<p>Specific Tourism Developments</p>	
<p><u>Tourism (page 137)</u></p> <p><i>Overnight, vessel-based accommodation of up to 24</i></p>	<p>New development permitted only within Visitor Services Zone and Sites. Page 132, 1999 plan</p>

<p><i>berths per vessel is permitted within the Motorised Vessel Overlay on the Gordon River, Macquarie Harbour and Port Davey-Bathurst Harbour.</i> Page 137</p> <p>Not consistent with the findings about river-bank erosion.</p> <p><i>To allow for the development of a commercial overnight walk experience in the Cradle Mountain/Barn Bluff region, provision of appropriate accommodation is allowed for in the vicinity of Lake Rodway within the Recreation Zone. The accommodation may be connected to the Lake Rodway Track by an access track that is up to T1 standard.</i> Page 137</p> <p>Further development in an area that is probably already exceeding carrying capacity.</p> <p><i>The South Coast Track, which is one of the most popular extended walks after the Overland Track and Walls of Jerusalem, also requires a Recreation Zone Plan to address concerns about its condition and to review experiences that are offered to its users. Formulation of the plan will need to consider, among other things, the lifting of a prohibition on built infrastructure on the track, previously in place through the 1999 TWWHA Management Plan, and the rollout of the State budget allocation of \$2 million over four years for improvement of existing infrastructure along the track.</i> Page 117</p> <p><i>Management Actions:</i> - Develop a Recreation Zone Plan for the South Coast Track;</p> <p>It would take much more than \$2 million to upgrade the South Coast Track to a ‘Cradle Huts’ walking standard. Long sections of extremely rough, boggy track would have to be surfaced or re-routed. Who pays?</p>	<p>Recreation and Tourism Strategy to be prepared in consultation with stakeholders (including conservation groups) Page 176</p> <p>Developments outside the WHA are preferred to those within the area. Page 177</p> <p>Developments close to existing park infrastructure (eg tracks, ranger stations) preferred, in accord with zoning system, track management strategy, existing vehicle access, no significant impact on wilderness values. Page 177</p>
<p>Hunting</p>	
<p><i>Hunting also occurs in parts of the TWWHA for restricted seasons during which local people follow some of the more socially important and environmentally benign ways of their parents and grandparents.</i> Page 46</p> <p>Hunting is described as one of the ‘presentation’ aspects, along with interpretation and information. Page 113.</p> <p>Draft plan <u>appears</u> to continue what was permitted in the previous plan on part of the Central Plateau and at Farm Cove on Macquarie</p>	<p><i>Although hunting is seen by some as a traditional recreational activity, it is seen by others as an inappropriate activity in a world heritage area.</i> Page 151, 1999 plan</p> <p>Hunting with shot guns and dogs and associated access permitted only:</p> <ul style="list-style-type: none"> - At Farm Cove Game Reserve on Macquarie Harbour (ducks); - Parts of the Central Plateau Conservation Area.

<p>Harbour and subject to what appear to be the same conditions. Does not appear to be change of the management overlay.</p> <p><u>Hunting Access</u> Allows transport of dogs and guns for the purposes of accessing above hunting ‘overlays’. Page 111</p>	
<p>Fire Management</p>	
<p>Draft Plan is confused on the subject of fire. Cultural-heritage sections claim the entire WHA is shaped by fire, but the Natural Heritage management section gives a balanced, common-sense description of the dual character of fire as both a destructive force and a necessary management tool. Pages 99-101 and 155-158</p> <p>Fuel-stove-only policy remains in place, but without specified means to strengthen it given recent trend towards campfires. Page 157</p> <p><i>The previous Management Plan specifically prescribed designated fireplaces at the South Coast Track locations of Surprise Bay and Little Deadmans Bay. However, this Management Plan makes no such permanent provision for these sites. As an interim measure, they will remain as designated fireplace locations pending completion of the TWWHA-wide review that is prescribed below.</i> Page 157-158 Confusing.</p> <p>– <i>Review the provision of designated fireplaces across the TWWHA, particularly within the 2013 extension, and provide an interim position to clarify key areas within the extension;</i> page 158 This review potentially undermines consistent fuel-stove-only prescription.</p> <p>Provisions for use of fire by recreationalists appear much the same from the 1999 plan to the 2014 draft; however, the necessary actions to strengthen these provisions is lacking.</p>	<p>Dual-nature of fire, as a necessary part of ecological processes and as a destructive force, is described. Pages 106-107</p> <p>Detailed exposition of past practices Page 107</p> <p>WHA is fuel-stove only area except for two designated fireplace campsites on the South Coast Track, other designated fireplaces in huts or camp grounds in the Visitor Services Zone, and certain sites on the Central Plateau. Page 107</p>
<p>Logging</p>	
<p><i>Extraction of specialty timbers must be considered through the RAA process and any other additional approval process determined by the Director in addition to any other applicable legislative process.</i> Page 81</p> <p><i>Permitted by authority or a licence issued by the Minister in accordance with the NPRMA</i> Page 74</p>	<p>No logging permitted. The only extraction of timber permitted is the salvage of Huon pine from Macquarie Harbour. Page 188</p>

Mining and mineral exploration

The Draft Plan allows for mining within parts of the Tasmanian Wilderness. The objectives of regional reserves and conservation areas include ‘mineral exploration and development’, and the *Mineral Resources Development Act 1995* applies to reserved land (that is, mining leases etc can be granted over reserved land). In addition, the approvals section of the Plan notes that approvals may also be required under other legislation, including the *Mineral Resources Development Act 1995* (page 78, Draft Plan).

Adamsfield is the only area within the WHA where (mineral) exploration and mining can occur.
Page 185, Draft Plan

The 5376-ha Adamsfield Conservation Area is less than 0.1% of the 1.58-million-ha Tasmanian Wilderness.

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