



Mole Creek Caving Club Incorporated.



Greg Alomes,
Executive Commissioner,
Tasmanian Planning Commission,
GPO Box 1691,
Hobart,
Tas 7001

16 May 2015

Re: Draft TWWHA Management Plan

Dear Mr Alomes,

The Tasmanian Planning Commission is now in receipt of the Director of National Parks and Wildlife's Report (*the Director's Report*) responding to representations made in respect of the draft Tasmanian Wilderness World Heritage Area Management Plan (*draft TWWHA plan*). Pursuant to s.22 of the *National Parks and Reserves Management Act 2002 (NPRMA)*, the Tasmanian Planning Commission may elect to hold public hearings to assist in its statutory review of the representations and the Director's Report.

The over 7,000 representations received raise a complex range of issues in respect of the draft TWWHA Plan. The organisations listed below strongly believe that inviting representors to attend hearings to outline their concerns will be the most efficient and constructive way for the Commission to interrogate whether the Director's report has provided an adequate response to those concerns.

In its 2015 report on the Wellington Park Trust's review of representations, the Commission was critical of the Trust for failing to explicitly provide its opinion on the

merits of all representations, as required by the *Wellington Park Act 1993*¹. The obligation on the Trust was identical to that of the Director under s.21 of the NPRMA, and a similar criticism can be made of the Director's failure to specifically outline in his report whether each of the representations had merit, and whether changes to the management plan to address representations were warranted.

For example:

- A number of representations raised concerns regarding the identification and protection of "wilderness" values. The Director's report refers to the wilderness mapping methodology, but does not clearly state what zone boundary amendments might be expected in applying the methodology.
- The submission from the Friends of the Great Western Tiers recommended that areas of the Tiers proposed for inclusion in the Recreation Zone were more appropriately included in a "Wilderness" zone given the limited recreational use of the area. The submission highlighted a range of characteristics of the Recreation zone that were inapplicable to the Great Western Tiers. The Director's report notes that the area does not have sufficient "wilderness" character, but does not seek to justify the selection of Recreation zoning over other available classifications.
- A number of representations oppose lifting the prohibition on commercial huts on the South Coast Track. The Director's Report acknowledges the high wilderness quality of the South Coast Track, but responds by proposing to "limit" development to 6 huts, rather than maintaining the current ban. No explanation is given as to how that level of development was determined to be appropriate or consistent with the management objectives for the TWWHA.

We believe that the most efficient way for the Commission to determine whether the Director's obligation to address representations has been met is to allow representors and the Director to appear at a hearing to discuss key issues.

The Tasmanian Planning Commission is bound to act consistently with the objectives of the Resource Management and Planning System, including the objective of encouraging public participation in resource management decisions. Inviting representors to appear at a public hearing to articulate their concerns, and to identify areas where they feel that the Director's Report has failed to address those concerns, would give the public confidence that their representations were being taken seriously and encourage them to continue to participate in future.

Reactive Monitoring Mission recommendations

In March 2016, the report of the IUCN / ICOMOS Reactive Monitoring Mission was released and made a series of recommendations of relevance to the draft TWWHA Plan. The Tasmanian government has committed to adopting all recommendations, which we welcome.

The Director's report does not explicitly respond to the Reactive Monitoring Mission report, however a number of the amendments proposed appear designed to meet this commitment. We believe that representors should also be given an opportunity

¹ Tasmanian Planning Commission. *Review of the Wellington Park Management Trust's report and representations: draft Amending Plan for the Pinnacle Specific Area*. June 2015, s2.2.2

to respond to the Reactive Monitoring Mission, to the extent that the Mission report reflects issues raised in their representations.

Further, it is not clear from the Director's Report whether any additional amendments will be proposed in response to the Reactive Monitoring Mission report. A public hearing would allow this to be clarified and any further amendments required to implement the Reactive Monitoring Mission's recommendations to be discussed.

For the reasons outlined above, and in recognition of the general public interest in rigorous and transparent management of the TWWHA, the undersigned groups urge you to hold public hearings in respect of the draft TWWHA plan.

We also urge you to consider inviting a representative of the Commonwealth government to be appointed as a delegate to the panel considering the draft TWWHA plan. This will assist in assessing concerns raised in representations regarding the extent to which the draft TWWHA plan is consistent with Australia's obligations under the World Heritage Convention, the *Australian World Heritage Management Principles*, and commitments made to implement the recommendations of the Reactive Monitoring Mission.

Yours sincerely,



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