

6 March 2014

State Environment and Communication Legislation
Committee
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Canberra ACT 2600



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Dear Committee Secretariat,

**Submission to the Senate Standing Committee on Environment and Communications:
Inquiry into the Tasmanian Wilderness World Heritage Area**

Thank you for the invitation to provide a submission to the Committee regarding the inquiry into the proposed revocation of parts of the Tasmanian Wilderness World Heritage Area (TWWHA).

Launched in September 2001, the Tasmanian National Parks Association (TNPA) is a non-profit, non-government organization which gives the public a voice on issues that affect Tasmania's National Parks and other conservation reserves. Like similar associations in other Australian States, the TNPA provides a link between the community, park policy makers and other government and non-government organisations to identify and address issues concerning the ongoing management of Tasmania's reserve system and other areas of high conservation status. Further information about the TNPA can be found at www.tnpa.asn.au

The TNPA considers that the arguments put forward by the Federal government to revoke 74,000 ha of the recent extensions to the Tasmanian Wilderness World Heritage Area (TWWHA) are severely flawed.

First, the government states that the revocation is justified because the new extensions contain 117 previously logged areas. However, according to the Forest Practices Code: "*a regeneration unit or cutting coupe should not exceed 100 ha.*¹" Hence, the maximum size of these 117 coupes will not exceed 11,700 hectares and the actual size is likely to be considerably smaller as not all coupes would be logged at the maximum size. Consequently, it is highly likely that the vast majority (> 90%) of the area identified by the government for revocation is still unlogged high conservation value forest (including some of the world's tallest flowering plants²) and consistent with the outstanding universal values for which these areas were originally nominated for and subsequently included in the TWWHA.

This is confirmed by comments made by Peter Hitchcock³, a key advisor on the original Tasmanian World Heritage nomination in 1989, that around 90 per cent of the land identified for revocation is outstanding eucalyptus forest with high conservation values that has never been logged. It is estimated that around 5–6% of the area would have been logged since 1960 and areas logged before 1960, if there were any, would have been selectively logged and not noticeable today.

So why is the government claiming an area of 74,000 ha needs to be revoked?

Second, the World Heritage Committee was aware of past disturbance in the nominated area when it approved the minor boundary modification in 2013. The existence of past disturbance does not mean that a site should not be listed, or that it has diminished heritage value.

Indeed, it is not unusual for World Heritage sites to contain small areas of damaged forest for the sake of boundary integrity. Nearly one-third of the famous Californian Redwood World Heritage property, which contains the world's tallest trees, had been clear-felled before it was listed in 1980. The logged areas have been undergoing rehabilitation to protect giant trees downstream from being damaged by erosion and sedimentation⁴.

Past logging practices may add to a perception of loss of value greater than is actually the case. A not uncommon practice, and one used overseas, known as strategic logging is to first log the upper reaches of a valley so as to claim that the values of the whole valley have been diminished⁵. Where this has occurred, such practices should not be rewarded. This would be akin to punching a small hole in the Mona Lisa and then claiming the whole picture has been destroyed. Obviously we would repair the picture, just as we can with the valley. The whole is obviously greater than the sum of its parts and the tall eucalypt forests now included within the TWWHA form a near continuous connected ribbon of forest extending for more than 180 km. The global significance of a connected area of tall eucalypt forests, albeit involving some restoration, added a major new dimension to the TWWHA².

Third, the overall management objective for the TWWHA is: *“To identify, protect, conserve, present and, where appropriate, rehabilitate the world heritage and other natural and cultural values of the WHA, and to transmit that heritage to future generations in as good or better condition than at present”*⁶.

There is a clear obligation to “rehabilitate” areas where values have been diminished. For example, the recent cessation of alluvial tin-mining near Melaleuca in Tasmania's southwest has resulted in this region being added to the TWWHA and the area will be rehabilitated to restore the high natural and wilderness values of this area⁷.

The Federal government has chosen to ignore this fundamental management objective in favour of apparently political objectives and instead proposes to revoke these areas and many others so more forests can be cut down and their “outstanding universal values” destroyed.

Fourth, apart from the high conservation values of the forests the universal values within the recent extensions to the TWWHA also include other natural and cultural values which need to be taken into consideration. These values include glacial and karst features, additional primitive flora and fauna groups, increased representation of endemic species within the TWWHA and addition of new species, and additional important habitat for threatened and rare species, including the Tasmanian devil, Spotted-tailed quoll and the Denison Rain Crayfish². Furthermore, the full significance of the cultural values relating to previous Aboriginal occupation in the areas marked for revocation is yet to be determined. Many of these values will be diminished, if not destroyed, if the areas are revoked and logged.

Fifth, wilderness quality within the TWWHA has been greatly enhanced by the 2013 additions and consequently these enhancements will be greatly diminished, if not lost, by the Abbott government's delisting proposal. Wilderness quality is an integral part of the outstanding and universal values of the TWWHA - as attested by the deliberate inclusion of 'Wilderness' in its name - and the *conservation value* of the TWWHA is considerably improved by the 2013

additions as they allow the wild character of the TWWHA to be considerably strengthened by making its interior more remote through the elimination of large-scale human activities (e.g. logging) and the closure of logging roads that would have remained open for logging and forestry work if these additions had not been made to the TWWHA. With wilderness quality being threatened and lost elsewhere around the globe we have an excellent opportunity in Tasmania to preserve and enhance these values within the TWWHA. It is an opportunity which should not be lost.

Sixth, each nation party to the World Heritage Convention acknowledges in article 4 its duty to: “do all that it can ... to ensure the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage situated within its territory.”⁸ The international World Heritage Committee, by inscribing the extension forests on the World Heritage List, legally acknowledged their outstanding universal value. Delisting, then logging, these forests would contravene Australia’s treaty obligations. If the World Heritage Committee rejects the request and the government logs the area it risks an “in danger” listing of the TWWHA which would be a disaster for the forests and our tourism industry. Indeed, the outstanding natural and cultural values currently protected within Tasmania’s national parks and WHA are one of the central tenets of Brand Tasmania.

Finally, it is pleasing to see key representatives of the Tasmanian Forest Industry also oppose the Abbott government’s proposal. For example, James Smith, executive chairman of Neville Smith Timbers, stated that the Tasmanian Forests Agreement (TFA) has “allowed us to re-think what we’re doing within our business and engender confidence with our customers...[I] have no doubt that where we’re heading there’s a bright future⁹”. Furthermore, the TFA is essential to the future as the Forest Stewardship Council certification that the TFA will bring is the ‘green stamp’ for forestry products now being demanded in key export markets. As Terry Edwards of the Forest Industries Association has stated, “Our markets are calling for conflict free wood”¹⁰. Indeed, Bob Gordon, former managing director of Forestry Tasmania, has stated that any product harvested from an area that was once WHA would “never be purchased by any customer in the world”¹¹. So just when Tasmanian forestry is looking to the future, the Abbott government seems intent on dragging the industry back to a past which customers don’t want and won’t buy.

Yours sincerely,



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