

## **NEW DRAFT 2014 TASMANIAN WILDERNESS WORLD HERITAGE AREA MANAGEMENT PLAN RELEASED FOR PUBLIC COMMENT**

On Thursday 15th January 2015 the Tasmanian government released the **2014 Draft Tasmanian Wilderness World Heritage Area Management Plan** for public comment. The public comment period closes on Sunday 22nd March 2015.

The TNPA has had concerns about the Plan review process and likely outcome since the review was announced in late 2013.

Causes for concern were –

- taking the planning process away from the Parks & Wildlife Service (PWS) with its highly experienced protected area planning staff, and vesting the process instead in the policy section of DPIPWE,
- the extremely limited public and other stakeholder consultation, and
- the extremely short proposed time frame (at that time 12 months) to revise a very complex plan for a significantly increased plan area with new values to incorporate.

The TNPA, in association with the Tasmanian Conservation Trust (TCT), expressed its concerns on these matters to State government several times in late 2013 through 2014, asking for a longer time frame and greater community consultation, and also advocating an approach to the plan review similar to the excellent approach taken in the preparation of the current *1999 Tasmanian Wilderness World Heritage Area Management Plan*. The advice was largely ignored, except the government did allow interested parties to make submissions in the early stage of the review process.

### **What is Wrong with the New Draft Plan**

The **2014 Draft Tasmanian Wilderness World Heritage Area Management Plan** has realised the TNPA's worst fears.

Key issues with the plan in relation to conservation appear to be –

- failure to clearly articulate and provide for the full range of values of the TWWHA (although these are well stated in the 1999 Plan);
- removal of the fundamental, globally recognised principles for environmental conservation which set the framework for management;
- the renaming of the 'wilderness zone' as a 'remote recreation zone', allowing for much greater usage, as well as new uses, throughout the TWWHA;
- a devaluation of the natural and cultural values for which the TWWHA was reserved, by misrepresenting the use, social and economic benefits that can be obtained from those values as values in themselves;
- removal of current commitments to the ongoing research necessary to understand the values and to actions which prevent impacts to values;

- provision for inappropriate new uses such as accommodation, aircraft, marine craft, and mountain bike tracks in the remote natural and wilderness areas;
- the provision for harvesting of specialty timbers within the TWWHA (outside the national park areas);
- general weakening of the development approvals process, including a lack of clear criteria for assessment, a less clear assessment process (also confused by the parallel Tourism EOI assessment process), and minimal provision for public input or scrutiny;
- the minimal consultation with the broad Aboriginal community in the preparation of the Plan - although significant changes to Aboriginal values management are proposed, requests for real consultation from the community have been ignored.

### About Conservation or About Tourism?

As noted in the introduction this revised plan has little to do with the protection of the natural and cultural values of the TWWHA, but a lot to do with opening up the area for development, in particular commercial tourism development, which potentially will have a significant impact on the values of the area.

The logical outcome of implementing this Plan is that a raft of new tourism developments, many inappropriate to the TWWHA or which could be undertaken outside the TWWHA, will be approved in the TWWHA; that the inadequately resourced PWS will not be able to monitor or manage these concessions; that significant natural and cultural values will be impacted through the actual development of the concessions and through their operation; that small tourism businesses that are successfully operating at present will be compromised, and a number will most likely fail; and the public will be denied access to concession areas of this public land or will not want to visit those areas which have intrusive use.

Although the government claims the Plan is about balancing values protection and tourism, there is no evidence provided that any balance has been sought or will occur, and it is extremely unclear how values will be protected under this 'open for development' plan. [The Plan appears to have been strongly influenced by the Tourism Industry Council of Tasmania](#), while scientific and community voices appear to have been ignored.

The *1999 Tasmanian Wilderness World Heritage Area Management Plan*, which, although not perfect, was a well-regarded, award winning, broadly accepted plan that provided a relatively balanced approach. It is therefore difficult to understand how the present government can call the 2014 Draft Plan balanced, given its significant departures from the 1999 Plan.

Also of concern is the TWWHA Tourism EOI process that the government is running in parallel with the 2014 Plan review. In 2014 the government invited expressions of interest in tourist developments in Tasmanian national parks (which closed on 21/11/2014) and received 37 formal expressions of interest (EOIs). In the same month that the 2014 Draft Plan was released (January 2015), the government started to assess the received EOIs. This would seem extremely premature given that we understand that a number of the proposed developments will be dependent on changes being made to the TWWHAMP to allow for a greater access and development. It would appear from this that the government intends to put the interests of tourism developers ahead of the need and requirement to conserve the recognised World Heritage values of the TWWHA.

## Managing Tourism & Genuine Sustainability

The Plan appears to be a deliberate attempt to increase commercial tourism access to, and development of, the TWWHA.

This is indicated not only by the tenor of the 2014 Draft Plan, but is also freely admitted by the current government which argues there is a need to ‘unlock’ the TWWHA, and which sees tourism as the economic salvation of Tasmania. The government’s approach is underpinned by a number of recent tourism documents including the 2013 *Tourism 21* document and the tourism industry’s 2014 *Reimagining the Visitor Experience of Tasmania’s Wilderness World Heritage Area – Ecotourism Investment Profile*.

Sadly, in spite of the government’s mantra that all commercial development in the TWWHA will be ‘sensitive’, Tasmania lacks the framework to ensure this. The above tourism industry documents do not provide any guidance in this regard. Nor does the government have a policy on environmentally sustainable tourism for Tasmania. This is in spite of this deficiency being pointed out to several successive state governments by various NGOs including by the TNPA. We suggest the government does not want any policy that might impede their quest for commercial tourism developments. Terms such as ‘ecotourism’, ‘sensitive development’ and ‘sustainable opportunities’ might sound good, but using these words does not guarantee environmentally benign outcomes.

As with other industries, commercial tourism is foremost about making money. Until there is better oversight, monitoring, and regulation of tourism to ensure that developments are environmentally benign, then clear policy and well considered management plans are required to ensure that tourism in conservation areas is appropriate and will not impact on the significant values for which these conservation areas were reserved.

It is also of concern that the process of increasing commercial tourism in the TWWHA has already started with the government’s advertising for Expressions of Interest (EOIs) for commercial development in the TWWHA in 2014 (see <http://www.investtasmania.com.au>). The government is now sitting on the 37 EOIs it has received until there is a management plan which will allow those developments to happen – presumably the 2014 Draft Plan. Of equal concern is the fact that there appear to be no clear criteria for appropriate development (i.e., environmentally sustainable development). A further concern is the fact that all commercial developments in the TWWHA are being treated as 100% commercial in confidence, so the public are never able to find out the conditions of operation or the financial returns to the community for the use of this public land. This is a completely unacceptable lack of transparency.

The only point at which the public is able to access any information is if there is a requirement for a public comment phase for development approval. This is in striking contrast to processes in other developed countries, such as New Zealand, where development proposals in national parks are required to be publicly posted on the government website, similarly to any development application under a local planning scheme. Why is it that in Tasmania there is more secrecy around a development application on public land than on private land?

## Debunking the Myths of an ‘Unproductive’ and ‘Locked-up’ TWWHA

The government and tourism industry’s (represented by the Tourism Industry Council of Tasmania) push for significantly greater development in the TWWHA can only be seen as irresponsible.

Their stated reasons for this developmental approach of more tourism development in the TWWHA are also questionable:

- **They claim that the TWWHA is 'locked up'**. BUT the TWWHA is public estate that has no restrictions on access provided that access does not harm its values. Indeed, like other national parks and conservation reserves, it has the most open form of land access anywhere in Australia. The current Management Plan provides for a range of appropriate activities including a vast array of self-reliant recreational opportunities (e.g., walking, rafting, kayaking, surfing, skiing, canyoning, climbing, fishing, hunting), for high use vehicle and other motorised access points, many with interpretative facilities presenting the TWWHA, and for commercial guided walking, camping, sight-seeing, nature appreciation, rafting and fishing. There are currently some 200 tourism businesses operating successfully within the TWWHA.
- **They claim that the TWWHA needs to contribute to Tasmania's economy**. BUT it already contributes in a major way to the Tasmanian economy. A 2008 Australian study<sup>1</sup> found that Australian World Heritage areas contribute significantly to the Australian economy, no less in Tasmania than elsewhere. The study found that in 2008 visitation to the Tasmanian Wilderness WHA alone contributed some \$730 million to the Tasmanian economy and 3,886 jobs.
- **They claim a decline in visitor numbers to the TWWHA needs to be reversed**. BUT, while there was a slight decline in visitors to the TWWHA before 2013, that is no longer the case. Visitor numbers grew strongly over the past two years, reaching record levels, and are projected to continue to grow strongly over the next five years (refer *Parks 21* document), without additional proposed tourism infrastructure. Many would interpret the decline as a consequence of the recent global financial crisis, something which is beyond Tasmania's control to manage for. It is also significant that whereas the decline has affected major commercial developments such as cruises on the Gordon River, commercial rafting on the Franklin River is booming without any need for infrastructure development, suggesting that visitors value the real wilderness.
- And disingenuously from the Premier Will Hodgman last week **in relation to predicted higher visitor numbers to the state - "we need somewhere to put visitors"**. Is the rest of Tasmania really at capacity?!

### **Towards Real Environmentally Sustainable Management**

Developing the TWWHA for greater and greater tourism income is an unsustainable approach. Nature-based tourism and Tasmania's wilderness and unspoilt natural places generally are major tourist drawcards, and ongoing development of the TWWHA will result in the loss of the very qualities that attract tourists. Surely it is preferable to manage the TWWHA to sustain its values and attraction into the future.

This can be achieved, but it requires an informed, long-term management vision and management guidance, something sadly lacking in the 2014 Draft Plan.

Demand-driven policies hark back to the old paradigm (since shown to be false) of "unlimited" resources that are "inexhaustible". The new paradigm is now to achieve a sustainable balance between supply and demand, i.e., managing to achieve pre-determined objectives based on an understanding of what is sustainable in the long term and those actions which help protect the values that underpin an area's significance.

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<sup>1</sup> *Department of the Environment, Water, Heritage & the Arts, 2008, Economic Activity of Australia's World Heritage Areas Final Report, Gillespie Economics & BDA Group.*

The government needs to start to rectify these shortcomings by developing principles for genuinely sustainable environmental-based tourism, and enshrining this in high level policy. The TNPA has recently, in conjunction with a number of other Tasmanian ENGOs, developed a set of [environmentally sustainable tourism principles](#) that the government could use as a starting point.

### A Place of Extremely Special Values

The Tasmanian Wilderness World Heritage Area is extremely special. It cannot be dismissed as just another part of the Tasmanian reserve estate. As a *World Heritage Area* it is of global significance. Even as a World Heritage Area (WHA) it is special. The Tasmanian Wilderness World Heritage Area occupies less than a quarter of Tasmania yet it is one of the largest temperate wilderness areas in the southern hemisphere.

It is a superlative World Heritage property. Not only is it comparatively large and of high integrity, but it is also recognised as meeting three of the cultural heritage criteria for listing as a WHA and all four natural heritage criteria for listing (although an area can be accorded WHA status if it meets just one criterion). No other World Heritage Area anywhere in the world meets more selection criteria than the TWWHA, and only one other worldwide meets as many as does the TWWHA.

Not only does the Tasmanian Wilderness World Heritage Area contain a number of *outstanding universal values*, but it also contains a wide range of other natural and cultural values of *national* and *state* level importance.

### Who is to Decide the Way Forward

The approach taken by the 2014 Draft Management Plan might be acceptable, even laudable, if applied to private property. But it is not acceptable for land that belongs to all Tasmanians, now and into the future. The outstanding values that have resulted in the TWWHA being listed as a World Heritage Area mean that this area must be held in trust as the heritage of all humanity. Its responsible management is therefore an obligation on the Tasmanian and Australian government – an obligation that was willingly accepted by both tiers of government when these places were nominated for WH listing. It is not an asset to be ruthlessly exploited by tourism interests, other commercial interests, or by transitory governments for short term gain.

It must also be recognised that this precious protected area does not exist due to the vision of government or the commercial interests that now seek to use it for their benefit. The Tasmanian Wilderness World Heritage Area has been a long time in the making and is the hard won outcome of over 100 long years of passionate public advocacy. The special nature and scenic splendour of the area was first recognised in the late 1800s; the reservation of core parts of the TWWHA “for the people for all time”<sup>23</sup>[3] was advocated strenuously in the early 1900s in spite of the government’s lack of interest; the preservation of the Western Tasmanian Wild Rivers was a fierce environmental battle of the early 1980s; and many environmentalists and scientists worked behind the scenes for many years in the 1960s-1980s to advocate for the inclusion of much of present day TWWHA in the Tasmanian reserve system. As recently as 2014 environmentalists and scientists had to fight to retain parts of the TWWHA in the face of an unjustifiable government decision to de-list a significant part

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<sup>2</sup> Gustav Weindorfer (1910), advocated for the reservation of the Cradle Mountain Lake St Clair area in the early 1900s

of this World Heritage Area. The government's new approach to the TWWHA Management Plan is a betrayal of all the work these concerned Tasmanian citizens have done over many decades.

This history shows that the true key stakeholders are the Tasmanian Aboriginal community whose ancestral land this is, and the scientists, environmentalists and general community members who have worked and fought for and supported the conservation of this area. Why is it then that the government has failed to seriously listen to these voices, and government and tourism interests deride the views of environmentalists?

History also shows us that governments have from time to time proven entirely untrustworthy as custodians of this heritage, as evident from revocations of parts of the Mt Field and Hartz Mountains National Park, the flooding of Lake Pedder National Park, and various other incursions on our protected areas. This shows us that governments cannot be relied upon to act to maintain and preserve Tasmania's significant natural and cultural heritage of their own accord. And we should not rely on them now!

### **Please Help Preserve the TWWHA – Make a Submission on the Draft Plan**

This 2014 Draft Management Plan is a disaster in relation to the protection of the Tasmanian Wilderness World Heritage Area (TWWHA).

The government needs to be urged to substantially revise the *2014 Draft Tasmanian Wilderness World Heritage Area Management Plan* to provide adequate protections for the range of natural and cultural values of the TWWHA. To do this, they need to talk to and listen to natural area planners, scientists, the Aboriginal community, and the community at large, and not just for vested tourism interests. And they need to ensure that all tourism in the TWWHA and on its edges is based on sound principles and will truly be environmentally sustainable.

The highly prejudicial, back door, inadequately informed and unclear approach to the future management of the TWWHA that has been taken in the 2014 Draft Management Plan should be an embarrassment to the Tasmanian government and the Tasmanian Tourism Industry. They can do a lot better than this.

If you are concerned about the future of the Tasmanian Wilderness World Heritage Area and its long term conservation, then make sure you put in a submission on the *2014 Draft Tasmanian Wilderness World Heritage Area Management Plan*. Let the government know that it is not a good Plan and that the TWWHA deserves the best protection!