

23rd June 2013

Attention: Penny Spoelder
TRC Tourism
PO Box 837,
Jindabyne, NSW, 2627.



TNPA Comment – Maria Island Ecotourism Development Feasibility Study Draft Report (June 2013)

Please accept the following comments from the Tasmanian National Parks Association (TNPA) in relation to the June 2013 Maria Island Feasibility Development Study Draft Report. We appreciate the one week extension of time (until 24th June 2013) for the submission of comment.

The Tasmanian National Parks Association (TNPA)

The TNPA was launched in September 2001. It is a non-profit, non-government organisation which gives the public a voice on issues which 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. The TNPA membership reflects a range of interests and expertise in relation to reserved land, and has within its membership considerable expertise in reserved land management and in natural and cultural values management. Further information about the TNPA can be found at www.tnpa.asn.au.

Key Comment

The TNPA congratulates the PWS on its responsible planning approach of commissioning a tourism feasibility study for Maria Island National Park. It is heartening to see previously ad hoc approaches being replaced by planned approaches.

Unfortunately however, the Draft Report, although very optimistic about the tourism potential of Maria Island, and clearly based on a considerable amount of research and a sound understanding of tourism, tourists and markets, would appear to be somewhat superficial when it comes to presenting a reasoned argument for 'ecotourism' development for Maria Island, a national park with considerable natural and cultural values, and World Heritage convict heritage in the Darlington precinct. To some extent it reads more like a 'scoping study' than a feasibility study.

While the TNPA does not necessarily disagree with the key conclusions of the Draft Report, we are concerned with the way the conclusions are arrived at, in particular –

- The failure to clearly acknowledge the context is a national park with an imperative and a priority to manage and protect the park's natural and cultural values, and meet the stated objectives for management.
- The failure to properly assess the potential impacts of what is being proposed on the Park values.
- The failure to acknowledge the constraints of the Management Plan, particularly in relation to its zoning (which has significant constraints on some of the proposals for broader use of the Island, for example with respect to a jetty at the south end of the island and sea kayak touring and camping).
- The limited exploration of the environmental and economic impacts of providing tourism on an island (rather than the Tasmanian mainland).
- The failure to assess the potential ecotourism and general tourism attractiveness of Maria Island in relation to other similar opportunities elsewhere in Tasmania (eg, the nearby Freycinet National Park and Tasman National Park), which will be highly competitive given that many other such places do not have the constraints that Maria island has of access by boat and the lack of truly iconic and national class scenic and conservation features.
- The failure to acknowledge the resourcing limitations of the PWS and consequent difficulties of the agency to manage what is proposed, as well as a lack of recognition that the primary role of the PWS is conservation (an obligation under legislation), not as tourism managers and developers.

The TNPA also questions the assumption on page 11 that “PWS ... need to generate sufficient visitation to meet the ongoing costs of maintaining and operating such a complex heritage environment”. This statement would appear to suggest that ecotourism development on Maria Island is largely being driven by a conservation imperative. Yes - the State and Federal governments have a collective obligation to preserve significant heritage such as the convict remains at Darlington, but No – the funds are not required to be generated from tourism at the place. While this might be desirable, it is rarely possible because of the impacts of tourism on the heritage. We do not accept, and do not believe, that cost recovery for management should be the driver for tourism on Maria Island National Park or for any other national parks, nor do we believe it is the government's intent.

The above are all critical issues which underpin the appropriate management of Maria Island National Park, and the capacity and scope, and success of increased tourism on the Island.

Finalising the Report

Given our concerns, the TNPA does not support the Maria Island Feasibility Development Study Draft Report in its present form.

The TNPA would like to see the Feasibility Development Study significantly revised to deal with the above issues. It is critical, if the natural and cultural values of Maria Island National Park are to be conserved, that the status of the Island as a National Park with World Heritage cultural elements is at the forefront of the discussion.

In our view there needs to be a sound, clear analysis of the values and potential impacts of various ecotourism opportunities (and levels of potential use), and of the consequent strengths and weaknesses of various opportunities up front, followed by a more clear and realistic assessment of what is possible and desirable. The Maria Island National Park & Ile Des Phoques Nature Reserve Management Plan 1998 and the Maria Island Darlington Settlement & Point Lesueur Conservation Management Plan 2008 must be a key basis for this discussion.

In general terms we support the discussion of approaches in Section 6, but this needs to be revised in the light of better analysis. We also appreciate that access, in particular the ferry service, is a key factor for ongoing and increased visitation to Maria Island.

Key areas in which we believe more thought needs to be given are as follow:

- The Maria Island National Park & Ile Des Phoques Nature Reserve Management Plan 1998 needs to be better integrated – a lot more use can be made of this Management Plan which is well thought out and has good information on values and visitation/tourism, but which has been largely ignored.
- Given that the study area is a National Park, with the management priority being for natural and cultural values management, and given that this is an 'ecotourism' study, there is a disappointing lack of discussion about the values (including an absence of discussion about geoheritage), the potential impacts on these values, and environmental sustainability generally.
- In our view Maria Island National Park, while having attractions that have brought people to the Island for decades, has very little that is new or special, and that is not available elsewhere. We suggest that if Maria Island really had iconic status or attractions, then this would have been realised by now, so attempting to promote the 'iconic' to attract visitors is unlikely to be successful in the long term. In our view Maria Island has a lot to offer without overpromotion - essentially the values articulated in the Management Plan – and it is these which should be seen as the core attributes for attracting visitors to the Island.
- Inadequate emphasis is given to quietness and isolation although these are emphasised as important to the "branding" of Maria. Developments need to not detract from the "atmosphere of quietness, solitude and contrast with the everyday artefacts of modern life" that is seen as a tourism and recreational theme.

- The proposed increase in visitor numbers appears to be plucked out of the air (largely based on Australian market growth figure with little consideration of the range of constraints imposed by Maria Island's geography, values and management context). We would like to see a better argued discussion of potential visitor numbers (that takes into account a realistic appraisal of opportunities, ferry capacities, accommodation capacity, services, costs, impacts, & other competing opportunities). It would also be useful to cite the impact on visitor numbers at other parks where a Revitalised Market Plan such as being proposed for Maria Island has been implemented. We do not necessarily argue that 30,000 visitors a year is too high a figure – what we are concerned about is that it hasn't been demonstrated to be a sustainable figure. Also, the projected increase in visitor numbers may be overly optimistic given that the ferry service is currently seen as a problem for increasing visits to the island and the report states that there will be at least a 3 year lead time to implement a new ferry services. There is also likely to be a period of at least 6 years to implement the report's recommendations (p70). The high uncertainty and lack of justification relating to the projected increase in visitor numbers also means that the additional economic benefits also remain highly uncertain and unjustified.
- We also would like to see a better argued case for the proposed rate of visitor growth. As it is presented it looks to be based more on economic desirability than realistic, environmentally sustainable growth. It is critical for the economic evaluation that the growth figures are realistic and sustainable.
- We are extremely concerned that although the Draft Report discusses the significant use of Maria Island by Tasmanians and the importance to them of low cost, basic accommodation including camping, this seems to be lost sight of later in the document. Very little information is provided about how camping will be managed (including numbers and cost). Costs are a particular issue in relation to low cost and family visitor opportunities: We do not agree that a spend of '\$121 per night' per person is a realistic cost for camping or for a low cost experience for locals, who already have a ferry fare to cover. National Parks are traditionally a venue for local visitors who enjoy nature and who cannot afford (or who do not like) higher end of the market accommodation – we are concerned that they are being lost sight of in this study.
- We appreciate that the availability of accommodation is a key limiting factor, but we would like to see this discussion developed in more detail (ie, more on the actual constraints on new buildings, modification of existing buildings, landscape issues, and a realistic and more quantitative assessment of additional water supply requirements, sewerage provision and waste management; more on current and proposed numbers for a camping – bunkhouse - upgraded cottages/rooms – standing camps mix, plus fees and costs; and how this is all to be serviced). Costs should also be directly related to the standard of accommodation.

The following are further specific comments in relation to accommodation:

- Camping on Maria Island is a traditional activity and is also seen as affordable accommodation. Therefore, while there might need to be some increase in camping fees, the TNPA is concerned that a doubling of fees is excessive – it is prejudicial to encouraging families and individuals on low incomes and is likely to deter families, young people and backpackers, and also runs the risk of encouraging people to camp illegally to save money, which has likely environmental impacts and policing costs. We also note that the individual fee is approximately 50% and question why two people sharing one tent should be paying effectively the same as a family?
- The TNPA is also concerned about potential upgrading of the Penitentiary. This accommodation has served the Tasmanian community satisfactorily for many years as under cover, basic accommodation. While basic, it is adequate and affordable; also living in this style is an experience that is related to old style holidays and to the conditions in which the original occupants of the Penitentiary lived. In the TNPA's view it is therefore preferable that the Penitentiary accommodation stays absolutely basic and low cost. Not upgrading the building is also a better heritage outcome. Moves for basic upgrading are also likely to lead to ongoing upgrading as the client type changes and the new users demand more, changes that will be increasingly unsympathetic to the heritage values.
- We generally support the proposal for a nature/adventure lodge based around Encampment Cove providing that analysis demonstrates that this would be a viable new development, but priority should be given to upgrading the built accommodation in the Darlington area as proposed (ie, refurbishment of the Bernacchi cottages and Coffee Palace).
- It is critical that the upgrading of the built accommodation in the Darlington area as proposed (ie, refurbishment of the Bernacchi cottages and Coffee Palace) complies with the Conservation Management Plan and is sensitive to the heritage.
- We strongly support the finding of the Feasibility Study that new buildings for up-market accommodation in the Darlington area are not appropriate (now or in the future). In our view new up-market accommodation elsewhere on the island is also inappropriate as it conflicts with the natural values, competes with existing visitor opportunities, conflicts with the experience of other users and is generally not in keeping with the vision for the National Park. We therefore also support that the only other accommodation elsewhere on the Island is limited to temporary standing camps. It is the TNPA's view that new up-market accommodation should be located on the mainland so that the benefits accrue to the communities there.

- We believe more discussion is need on the management issues and constraints – the PWS is not a tourism developer and given the funding cuts to the organisation since the mid-late 1990s it does not have the capacity to manage the proposed tourism on Maria Island as recommended in the Draft Report. There needs to be more exploration therefore of how the additional tourism development can be realistically managed, including more information on the real costs of development and management.
- In this context we note that there is little discussion of the need for, and costs of ongoing monitoring and repair of the additional proposed use.
- We believe that the analysis of commercial guided opportunities needs considerably more development – there is currently no discussion of how more such opportunities will impact on existing tourism (including with respect to availability of locations and camping sites, and impacts on exclusivity & isolation), hence what the real capacity for additional new such opportunities is. Some hard numbers would be useful.
- The seasonality of opportunity, especially given the emphasis on camping based accommodation and outdoor recreation, is not addressed. Key issues in summer are availability of water (at Darlington and elsewhere) and in winter strong cold winds (from the west and south-west). Winds are also an issue for sea kayaking throughout the year.
- We see uncertainty of adequate water supply as a real issue that needs to be more seriously addressed in the Draft Report (with climate change weather is becoming more unpredictable and therefore the ability to provide adequate water for larger numbers of visitors is also becoming more difficult to predict). While the report states that water collection and storage facilities will need to be augmented the report provides little detail and or recommendations/priorities as to what is needed to adequately address this issue (especially in the longer term with a likely shift to drier summers).
- While we are not necessarily opposed to the proposal to develop opportunities for kayak touring and cycling on/around the island, the proposal lacks critical detail including –
 - What sort of numbers can be supported?
 - Where will people camp (given that no camping is currently permitted in the Natural Zone – a large part of the island including the coastline)?
 - What new infrastructure will be needed for cycling – if new tracks are needed, what is proposed and what are the potential impacts?
- We are concerned about the lack of discussion on the proposed jetty at the southern end of the Island. The proposal needs to be better argued and described (what exactly will it be, where will it be, why is it needed) and its necessity argued, particularly given the fact that the Management Plan does not allow for new jetties except at Point Lesueur/Encampment Cove.

- The TNPA is concerned about the promotion of 'scenic flights'. Not only would these detract from the peace and quiet and feeling of isolation, but they may also be a threat to nesting eagles.
- The TNPA has concerns about the proposal for having 'Food and beverages' available for sale on the island. While we understand this is desirable at Darlington, litter is becoming an increasing problem in "natural" areas of high visitation in Tasmania. Potential sources for litter need to be limited, and the issue needs to be managed (eg, strong anti-littering messages and strong commercial licensing conditions and monitoring).
- There are a range of minor but significant errors and omissions in the Draft Report which need to be addressed (and also detract from confidence in the findings of the Draft Report). For example –
 - There is no mention of kayaking and other boat based recreation and leisure activities as current activities in the early discussion when in fact they are very popular activities now;
 - The PWS website advises that the entry fee is \$12, not \$10 as stated in Section 2.2;
 - The historical significance of the Darlington area was recognised well before 2010 (refer Section 2.1 & 2.8.3).
 - We question Maria Island having "river estuaries" - at best Maria Island has creeks, not rivers.
 - Encampment Cove is not shown on the map provided on p4, despite the fact that there are a number of recommendations in the report in relation to this location. For someone not familiar with the island this is very confusing. Indeed, it would be useful to also provide a simpler map more clearly indicating all locations which are subject to one or more recommendations.

Conclusion - Overall Approach to Management & Tourism

As part of the framework for the Maria Island Feasibility Development Study, it is necessary to recognise that all use has impacts on values. Since the area has been set aside for its conservation values, all tourism must be predicated on, and responsive to, natural and cultural values conservation. All impacts must be monitored and management must provide for the assessment of values and the ongoing monitoring of the condition of these values (and these must be included in the assessment).

There is a paradoxical challenge which is this: to present the conservation values of this significant area, which exist to a great extent because of inaccessibility and lack of intrusion, without destroying those very values by overuse by tourism.

In revising the Maria Island Feasibility Development Study, the protection of its natural and cultural (including social) values needs to be a priority. Protecting these values must be stated as the primary objective of any development for the National Park.

TNPA also strongly recommend a slow and cautious approach, including starting with actions that carry the lowest possible impact.

In developing the Maria Island Feasibility Development Study lies a golden opportunity to 'get it right'; to learn from the mistakes that have been made previously. Wherever there is doubt the Precautionary Principle must be exercised. Too often, promoting an area as a tourist destination is a sentence of "death by a thousand cuts". This doesn't need to be the case if the guiding authority is absolutely clear about its objectives: first and foremost the objective of conservation.

Yours sincerely,

A handwritten signature in black ink that reads "R Campbell". The letter "R" is large and stylized, with a loop at the top. The name "Campbell" is written in a cursive script.

Dr. Robert Campbell
President
Tasmanian National Parks Association

Copy: Manager, Parks and Wildlife Service