

29 October 2007

Peter Mooney  
General Manager  
Parks & Wildlife Service  
GPO Box 1751  
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Dear Peter,

Thank you for your letter, dated 14 September 2007, informing the TNPA of the release for public comment of the Draft Tasmanian Wilderness World Heritage Area Management Plan 1999 – 2007 Update.

The TNPA notes that on Page 1 of the Table of Changes it is stated that the limited review was to focus on the following three issues: a) fixing errors, b) addressing significant new issues; and c) dealing with areas of the plan that are significantly under performing. To the extent that the revision to the Plan incorporates comments received during Stage 1 (the TNPA notes that 10 of the 21 issues raised in its Stage 1 submission have been incorporated to some extent into the new plan), and also noting that that revisions bring the Plan into line with the legislative changes since 1999, the TNPA is generally supportive of the revisions made.

However, the TNPA notes with some concern that fact that many of the significant issues (including 7 issues raised in its submission) which it believes should have been addressed under focus item (b) above have been held over to the next review in 2009. The TNPA believes this delay may result in activities related to some of these issues continuing to impact in a detrimental manner on WHA values. Of particular concern is the issue relating to accommodation within the WHA - an issue which the TNPA has raised on a number of occasions in previous submissions.

Apart from carrying over the previous approval for a development at Pump House Point, the management objective in relation to Accommodation in the original 1999 Plan is stated as follows: *“To encourage the provision of accommodation in nearby townships and areas adjacent to the WHA”* (p132). It is also stated that *“If facilities or services exist or can be developed outside the WHA that meet visitor needs, such facilities and services will not be provided as concessions within the WHA”* (p 178). Despite these management objectives three new developments have been approved (or undergoing approval) since the 1999 Plan came into force and will “provide approximately 350 new beds of mid to high standard accommodation inside the WHA.” (p 79 of the Table of Changes). The TNPA argues strongly that none of these developments needed to be provided as concessions within the WHA as all could have been “developed outside the WHA that meet visitor needs” and as such the TNPA views approval of these developments as a failure to correctly implement

the management objectives of the 1999 Plan. Given this failure, or under-performance as specified by focus item (c) of the review, the TNPA believes that a more definitive statement is required in the revised Plan clearly stating that all future accommodation development will be located outside the WHA. The TNPA notes that this is also the stated opinion of the WHACC. The TNPA has consistently cited the success of development nodes outside parks, such as those at Strahan and Cradle Valley, to support its position and also believes that the delays presently being experienced in progress related to the approved developments at Cynthia Bay and Cockle Creek East gives further credence to this development model.

The TNPA notes with particular concern the submission by the Department of Economic Development to encourage changes designed to facilitate developments within the WHA such as the amendment altering the Management Plan in the Cockle Creek East Area. Such a change would significantly undermine the management objectives of the Plan to protect WHA values and it is disconcerting that a Government Department is advocating such an approach to management of the WHA as this is in direct opposition to the (newly) stated principle of highest priority which is “*to ensure that the natural and cultural heritage of the TWWHA is protected from degradation*” (p10 of the Table of Changes). The response stated in the Table of Changes (that the intention of the revised New Proposals And Impact Assessment (NPIA) process is to have a clearer, faster, more streamlined assessment process that is rigorous and comprehensive) is also of concern as this appears to suggest that the revised NPIA process will help facilitate such a request. Indeed, the TNPA is concerned that the advice of the Ministerial Council has been removed from this process as recent planning decisions made in Tasmania in relation to environmental matters indicate that short-circuits in the approvals process can undermine the integrity of the resulting Ministerial decisions. While the TNPA understands the need to revise the NPIA process in the light of legislative changes, it remains concerned about the streamlining of the process to ensure a faster delivery of outcomes if this is at the expense of a more rigorous process that allows sufficient time for public input and comment from other representative bodies on such proposals. As such, the TNPA would like to see the proposed NPIA process strengthened to ensure input from the public, and advice from the WHACC and other such representative bodies at all stages. If the process remains too reliant on agreement between State and Federal Ministers then the process may become prone to ‘political’ stand-offs such as witnessed in the recent Macquarie Island issue or as in the case of Cockle Creek East where decisions may be biased due to political favoritism.

The TNPA also notes that significant changes have been made in relation to the Walking Track Management Strategy. As the TNPA held the conservation member position within the BATR Group it understands the need to move away from the concept of developing Track Management Strategy based on a permit system to one based on the Limits-of-Acceptable-Change (LAC). However, the suggested revisions to the WHA Plan appear to completely ignore the specifics of the management strategy based on the LAC approach agreed to by the BATR Group. For example, the revised text states that it will “*Use an open, independent, consultative assessment system to provide advice on desirable environmental and social outcomes...*” and “*Establish the necessary systems to effectively manage walking areas to ensure sustainable levels of use...*” (p 33 of Table of Changes). However, these statements ignore that fact that such “an open, independent, consultative assessment system” has already been undertaken via the BATR process and that the final report of this group (The Bushwalking and Track Review: Stage 2 – Western Arthur Range: management Options) has already established “the necessary systems to effectively

manage walking areas to ensure sustainable levels of use.” As such, the TNPA would like this section of the revised text to be rewritten to acknowledge the work of the BATR Group and incorporate in the revised Track Management Strategy reference to the specifics of the LAC based management system agreed to by this Group (i.e. the system of target and limit reference points and resulting management responses when these reference points are breached – which incorporates, when required, the use of quotas). To leave the revised text as it is currently written would undo all the useful work of the BATR Group and leave the WHA Plan with no specific strategy (apart from some vague reference to the LAC system) for management of walking tracks.

In light of these comments, the revised text under Key Focus Area 6 on page 26 also needs to be strengthened, replacing the paragraph *“The first area to be assessed in this way was the Western Arthurs. The proposed management regime for this and other priority areas will be implemented as funding permits.”* with *“The first area to be assessed in this way was the Western Arthurs. The proposed management regime will be extended to the management of all walking tracks in the WHA and will be implemented on a priority based system as funding permits.”*

Given the support for the LAC based management system among the diverse range of stakeholder groups represented on the BATR Group, the TNPA supports consideration of adopting the LAC based management system in relation to other management issues in the WHA. In particular, this could include the development of such systems for all zones in the WHA Plan including Visitor Service Zones which the TNPA believes are becoming subject to increasing over-development in some places resulting in the deterioration of WHA values.

Finally, in relation to other issues held over to the 2009 review the TNPA stands by the comments made in our Stage 1 submission and supports the inclusion of the changes as suggested. In the event that the PWS decides to continue to hold off these issues until the 2009 review, then the TNPA requests that the PWS consider initiating a consultative process to review some of the more substantive issues in the short time so that the results of this process can feed in a timely manner into the 2009 review. To hold off on such a process may result in substantive delays being experienced in completing the full review.

As usual, the TNPA is happy to meet with you or other PWS staff to discuss these matters further if the PWS is interested.

Yours sincerely,

A handwritten signature in black ink that reads "R Campbell". The signature is written in a cursive, slightly slanted style.

Robert Campbell  
**Vice President**  
**Tasmanian National Parks Association**