



Critique of Reserve Activity Assessment of proposed tourist development on Halls Island, Lake Malbena, TWWHA

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Wilderness

The Tasmanian Parks and Wildlife Service's Reserve Activity Assessment's (RAA) assessment of the impacts of the proposal on wilderness value stated:

Likely Impact: Low level impact. Wilderness qualities may be improved by eliminating seasonal tree (firewood) harvesting by unauthorised users of the existing Halls Hut.

The reference to the essentially irrelevant issue of firewood collection only serves to emphasise how the RAA has completely missed the key point – remoteness from access is a major component of National Wilderness Inventory (NWI) wilderness value and the proposal's helicopter landing site would provide a new access point into an otherwise remote area! This is now confirmed by the release of an expert assessment (commissioned by TWS using the NWI methodology) of the effect of the Lake Malbena development on wilderness values¹. It shows substantial impacts from the establishment of a new point of commercial helicopter (i.e. public) access.

This is the study that should have been included in the RAA to comply with the requirement of the TWWHAMP to consider impacts on wilderness values. The RAA wilderness assessment correctly referred to the NWI methodology (referenced in TWWHAMP 2016) but overlooked the most obvious impact on "wilderness value" – the helipad provides easy access for guests of the commercial operation in an area which is otherwise a full day's walk from the nearest vehicle access. It will therefore have a major impact on the "Remoteness from Access" component (the definition of which specifically includes helipads) and will therefore substantially reduce the Total NWI Wilderness Value.

Impact on natural values

Halls Island is of extremely high conservation significance because, in an area dominated by eucalypt forest, it has one of the largest extents of relict rainforest on the entire Central Plateau (it is the largest island in a lake on the Central Plateau – this has historically provided substantial protection from fire). On this basis alone it should be one of the last locations to be considered for development of any sort. This point has been largely overlooked in the assessment.

Compliance with zoning requirements

No plan showing the exact size and location of all buildings and facilities has been provided, only a general indication of the location of the major buildings. The inclusion of all the components would make it even more apparent that this is a small accommodation complex; its classification as a standing camp is a stratagem to avoid acknowledging its non-compliance with the intent of the TWWHA zoning.

¹ <https://tnpa.org.au/wp-content/uploads/2018/12/Assessment-of-potential-wilderness-impacts-at-Lk-Malbena-Hawes-2018.pdf>

Potential for water pollution

Not only is there no detailed plan of the proposal, there is no indication of the energy source(s), size or location of the toilet, water supply or holding tanks for sewage or grey water. There is no acknowledgement that a shower may be provided despite this being described as a luxury camp where guests are expected to spend three nights.

The proposal is located on an island in a lake in the TWWHA. The existing quality of the surrounding water is extremely high and no potential contamination should be tolerated. Provision of a shower will massively increase the volume of grey water produced and its dispersal *in situ* would probably require a "French drain" type of system similar to that used by Cradle Huts. On a small island in a lake, this is likely to pose an unacceptable risk of contaminating the lake. The RAA states that all effluent will be removed but no information is provided on how this is to be achieved. It is likely to require sizeable storage tanks on the island for sewage and grey water which will need to be removed periodically, slung beneath a helicopter. This will inevitably involve additional helicopter flights and some risk of spillage.

The proponent should have been required to detail exactly how effluent removal is to be achieved so the risks could be properly assessed and appropriate permit conditions imposed.

Due diligence

It is customary to undertake due diligence on a proposal prior to expending significant resources on its assessment. The ostensible purpose of this proposal is to provide guests with a multi-day cultural experience. This seems unlikely to be viable because there is very little to occupy, except briefly, anyone other than already knowledgeable field naturalists.

Any activities off the island will require the construction of walking tracks which will have substantial impacts on the environment and wild character of the area. Approval for these has yet to be obtained (and, in the case of those leading to nearby Aboriginal sites, is most unlikely to be obtained) and the expense of construction will substantially impact the financial viability of the proposal. Without them, guests will be confined to a tiny cabin and communal hut and restricted to a short length of boardwalk on the island.

The proponent's demonstrated experience is as a fishing guide. His Lake Ina 'camp' (located around 10 km south of Lake Malbena) exists to provide a trout fishing experience. It is a short, easy walk from vehicle access and a short, easy walk to Lake Ina across quite open country. It is not comparable with what is proposed at Halls Island, Lake Malbena and it does not provide evidence of the proponent's ability to provide a cultural experience at Lake Malbena. The proposed activities at Malbena do not include fishing. It is reputedly not a good lake for fishing and although some of the adjacent lakes are, the area is significantly rougher than the surrounds of Lake Ina; access to these lakes for anyone other than experienced bushwalkers will require the construction of tracks.

If there is another, unstated, rationale for this proposal (e.g. a fishing lodge utilising the surrounding lakes, or to provide short duration visits for guests from Pumphouse Point Lodge at Lake St Clair) this should be made clear, so that the impacts (e.g. additional tracks in the surrounding area or more frequent helicopter flights) can be addressed in the assessment.