



12 April 2019

The Premier and Minister for National Parks,
The Hon. Will Hodgman MP,
Parliament House, Hobart, Tasmania.

Dear Mr Hodgman,

TOURISM MASTER PLAN FOR THE TASMANIAN WILDERNESS WORLD HERITAGE AREA

As you are aware, the concept of a Tourism Master Plan for the Tasmanian Wilderness World Heritage Area was proposed in the 2015 draft Management Plan for the Tasmanian Wilderness World Heritage Area and the 2016 final Management Plan. The 2015 Reactive Monitoring Mission (RMM) recommended that the TWWHA management plan should establish strict criteria for tourism developments within the property (Recommendation 6). This did not occur. The RMM also endorsed the concept of a Tourism Master Plan for the Tasmanian Wilderness. The relevant RMM recommendation is as follows:

Recommendation 7

The comprehensive Tourism Master Plan details should refine the balance between legitimate tourism development and the management and conservation of the cultural and natural values of the TWWHA based on further consultation and negotiation of competing interests. (p.19, RMM Report 2016).

In explanation of its support for such a plan, the RMM said:

... the mission fully endorses such a Tourism Master Plan provided adequate stakeholder participation and funding. The Tourism Master Plan can provide a much needed opportunity to agree on and guide the consideration of individual and cumulative impacts of tourism development projects beyond the general provisions of the Draft Management Plan... In addition to environmental considerations, it is recommended that any new tourism development in the property, regardless of its nature and spatial extent, be systematically preceded by a cultural heritage impact study, including appropriate non-interventionist surveys in sensitive areas. (p.19)

In 2016, the World Heritage Committee noted that 'a separate Tourism Master Plan will be elaborated in order to refine the balance between legitimate tourism development and conservation of cultural and natural attributes, based on consultation and negotiation with relevant stakeholders, including the Tasmanian Aboriginal Community' (40 COM 7B.66). In 2018, the Committee urged Australia 'to expedite the development of the Tourism Master Plan in order to ensure a strategic approach to tourism development within the property, **in line with the primary goal of protecting its Outstanding Universal Value (OUV)**, and to submit the draft Tourism Master Plan to the World Heritage Centre for review by the Advisory Bodies prior to its finalization' (emphasis added, 42 COM 7B.61).

We emphasise that both the Committee and the RMM saw the putative Tourism Master Plan as a means of achieving the **primary goal** of protecting the property's Outstanding Universal Value

(OUV). In the meantime, the Tasmanian Government, with the support of the State Party, has undermined that primary goal and systematically pre-empted the proposed Tourism Master Plan in the following ways:

- Approvals for major new tourism infrastructure within the Tasmanian Wilderness have been given to projects such as the Lake Malbena luxury accommodation development (this has halted only by its failure to gain local government approval, although this is subject to appeal) and the Maydena bike-trails development;
- The Reserve Activity Assessment (RAA) and environmental conditions applying to the Maydena bike-trails have been withheld from the public, despite the granting of \$800,000 of public funding to this development;
- The Tasmanian Government has given in-principle support and entered into negotiations over leases and licences for a large number of other proposed developments within the World Heritage property, including in the Walls of Jerusalem area, in the Frenchmans Cap area, along the Overland Track and along the South Coast Track. This has occurred despite the absence of a comprehensive cultural-heritage assessment;
- The State Party has granted \$3 million for new accommodation complexes along the South Coast Track in advance of any environmental or cultural-heritage assessment;
- Up to \$60 million of public funds have been allocated to a cable car at Cradle Valley, inside the World Heritage property, in advance of any environmental or cultural-heritage assessment;
- The State Party granted \$70,000 of taxpayers' funding to assist the proposal for accommodation development and track construction at Lake Geeves, in the heart of the Tasmanian Wilderness, despite this proposal being completely inconsistent with the 2016 Management Plan.

We note that your government has engaged a consultant to facilitate preparation of the proposed Tourism Master Plan for the Tasmanian Wilderness. The Scope of Works for that consultant's work makes it clear that the objective of this proposed plan is heavily skewed towards expanded growth in tourism within the World Heritage property. The emphasis is on identifying sites and precincts as growth areas. An ominous part of the scoping document says:

*The Stakeholder Engagement and Tourism-related Presentation Opportunities project elements will focus on those areas of the TWWHA specified in the TWWHA Management Plan as Visitor Services Zones and Recreation Zones (including road corridors). These are the areas that provide, or are anticipated to provide, the highest level of developed visitor facilities and where the majority of visitors experience the TWWHA. Notwithstanding this, recreational activities such as multi-day bushwalking are undertaken in parts of the TWWHA outside the Visitor Services Zones and Recreation Zones. Whilst the focus will be on these zones, **the TMP will need to ensure all tourism-related experiences and sites are considered.** (emphasis added)*

It is clear from these words that the proposed master plan could potentially ignore and undermine the zoning system within the 2016 Management Plan. We note that the zoning system has already been tampered with to facilitate development at Lake Malbena and other sites. In addition, the systematic cultural-heritage assessment called for by the RMM has yet to occur. How can a master plan be developed without this critical information?

We are also disturbed by the way in which other 'master plans' for Tasmania's natural heritage have been developed. The so-called 'master plan' for the Cradle Valley area was prepared with no public consultation; it is no more than a glossy development proposal. The draft Freycinet Master Plan was also badly skewed in favour of development over conservation and the second draft, while it has addressed some specific issues, fails to acknowledge community concerns regarding overdevelopment and uncapped visitor numbers. These precedents provide no confidence that the

Tourism Master Plan for the TWWHA will incorporate community concerns regarding protection of wilderness and other values clearly expressed in comments on the 2014 draft TWWHA management plan and Lake Malbena tourism development proposal.

When the RMM endorsed the concept of a Tourism Master Plan, it emphasised the need to 'guide consideration of the consideration of individual and cumulative impacts of tourism development projects', and to help meet the 'primary goal' of protecting the OUV of the property. It was not envisaged as a means of prioritising private commercial tourism interests over conservation or of subverting the statutory Management Plan. Nor was it envisaged as a means of pre-empting a comprehensive cultural-heritage assessment of the property. The behaviour of government in pre-empting the proposed master plan by approving and funding developments within the World Heritage property was also not foreseen.

In order to restore credibility to the master-plan process, we believe that it is necessary for both the Tasmanian Government and the Australian Government to take the following steps:

- Suspend development of the Tourism Master Plan until a comprehensive assessment of Aboriginal cultural heritage in the TWWHA has been completed;
- Suspend all public funding to proposed developments within the Tasmanian Wilderness World Heritage Area pending finalisation of the Tourism Master Plan;
- Suspend approvals and negotiations over leases and licences for proposed developments within the Tasmanian Wilderness World Heritage Area pending finalisation of the Tourism Master Plan;
- Stipulate that the primary goal of the tourism master-plan process is to protect the Outstanding Universal Value of the Tasmanian Wilderness once the process resumes;
- Stipulate that the proposed Tourism Master Plan is subordinate to the 2016 Management Plan once the process resumes;
- Commit to publicly disclosing all relevant information pertaining to the environmental impacts of tourism developments on public land within the World Heritage property, including RAAs and environmental conditions on leases and licences.

The Tourism Master Plan represents an important opportunity to do things right. There is scope for a win-win here that protects and respects the World Heritage Area as well as fostering responsible, durable and ethical tourism that is surely in the best interests of Tasmanian society. We would like to play a constructive role in this exercise but given the problems outlined above, that possibility is distinctly challenging.

We would like to appeal to you to make this process the best it can be and to at least discuss our concerns with us.

If the scoping and foundation of the consultation exercise are flawed, so too will the outcomes meaning that the proposed Tourism Master Plan will be unable to fulfil the objectives envisaged by either the Management Plan or the RMM.

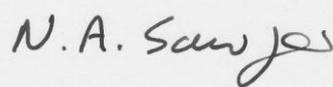
Yours sincerely,



Tom Allen
Acting Campaign Manager
Wilderness Society



Peter McGlone
Director
Tasmanian Conservation Trust



Nicholas Sawyer
President
Tasmanian National
Parks Association.



PREMIER OF TASMANIA

Messers Allen, McGlone and Sawyer
c/- tom.allen@wilderness.org.au

15 MAY 2019

Dear Sirs

Thank you for your letter dated 12 April 2019 regarding the Tourism Master Plan (TMP) for the Tasmanian Wilderness World Heritage Area (TWWHA).

The natural and cultural values of the TWWHA are of Outstanding Universal Value and are recognised globally. Indeed, it is one of only two World Heritage Areas listed that meets seven out of the ten listing criteria.

As you have indicated, the preparation of the TMP is a prescribed action of the TWWHA Management Plan 2016. The World Heritage Convention not only requires these values to be protected and conserved, but also presented to the world to be enjoyed and understood. The 2015 UNESCO Reactive Monitoring Mission endorsed the concept of a TMP, which it saw as refining the balance between legitimate tourism development and protection of values.

In response to the specific concern raised regarding development of the TMP in the absence of “*a lack of a comprehensive assessment of Aboriginal cultural heritage in the TWWHA*”, I am advised that Aboriginal Heritage Tasmania continue to undertake assessment of Aboriginal cultural heritage within the TWWHA. Further, and as you would be aware, KDO 6.1 of the TWWHA Management Plan 2016 stipulates that the development of a TMP must be undertaken in consultation with Tasmanian Aboriginal people. In fact, one of the fundamental aspects of the TMP is recognition and presentation of Aboriginal cultural heritage and the Aboriginal Heritage Council is directly represented by two Council members on the TMP Advisory panel.

Finally, any proposal submitted through the Government’s Expression of Interest (EOI) process for tourism opportunities within the TWWHA must comply with the TWWHA Management Plan 2016. As the TMP is a subordinate document to the TWWHA Management plan, EOI proposals must be compliant with the TWWHA Management Plan (as the statutory plan) and are therefore not dependent on the TMP for assessment and approval. The TMP will provide guidance on visitor experience outcomes and processes for determining how tourism and related recreational services and products may be delivered.

Our national parks and reserves are one of the key drivers of growth in our visitor economy, and my Government remains committed to supporting sensitive and appropriate developments in national parks and reserves, including within the TWWHA.

Thank you again for writing to me on this matter.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Will Hodgman', with a stylized flourish at the end.

Will Hodgman MP
Premier