



tasmanian conservation trust inc



Hon Matthew Groom MP
Minister for Environment, Parks and Heritage
Parliament House
Hobart 7000

16 October 2014

Dear Minister,

Re: The expressions of interest process for tourism developments in the Tasmanian Wilderness World Heritage Area, national parks and other formal reserves

The Tasmanian Conservation Trust (TCT) and the Tasmanian National Parks Association (TNPA) request a meeting with you at the earliest possible opportunity to discuss issues regarding the state government's current call for expressions of interest for tourism developments in the Tasmanian Wilderness World Heritage Area, national parks and other formal reserves.

In particular, and given the absence of guidance in the documents being provided to proponents, we would like to discuss and seek some clarification from the government on what it sees as appropriate and sensitive development in reserves.

We have read all the documents provided to prospective proponents and the most detailed explanation provided is contained in Attachment two, criterion one, page 24 of 'Tourism Investment Opportunities in the Tasmanian Wilderness World Heritage Area and national parks and other reserves' (Tourism Investment Opportunities Eol document).

We have contacted the relevant section of DPIPWE and have been told that Criterion one is the most detailed information that is provided to prospective proponents relevant to assessment of impacts on natural and cultural values.

We have concerns regarding the inadequacy of these assessment criteria. These concerns are heightened by the fact that the minister will be making the final decisions (page 8, Tourism Investment Opportunities Eol document) and that the government appears to be considering changes to legislation (which presumably may mean changes to management plans and classes of reserves) if a proposed development is incompatible with 'the current statutory and regulatory framework' (page 24, Tourism Investment Opportunities Eol document).

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Criterion one includes four dot points but only the fourth dot point is relevant to environment and cultural heritage matters. The first three dot points deal with general information regarding the location, type and size of the proposal, economic and social benefits and the target market of the proposal.

Dot point four is the only point which relates to environmental and cultural values but it is not truly an assessment criterion as it merely requests information from the proponent rather than setting any specific or defined standards, preferences or constraints.

Sub-point one asks proponents to identify the compatibility of the proposed development with the 'natural and cultural values' but fails to state any clear preference for projects with less potential impacts or to distinguish between acceptable and unacceptable impacts and the types and importance of values.

Sub-point two asks proponents to state the compatibility of the proposed development with 'statutory management objectives and purpose of the reserves and any applicable management plans and any other regulatory requirements'. This point only asks proponents to state, in their opinion, whether the proposal is consistent with the appropriate legislation and management plans and fails to state a preference for projects that are consistent. It also fails to distinguish between statutory or regulatory changes which may be acceptable in terms of cultural and environmental values and those which may not be.

Sub-point three asks proponents how their proposal is designed to 'minimize the footprint on the site' but fails to indicate a preference for a small footprint or that there is any absolute limit to the footprint. It also fails to indicate that the impacts of the footprint may be greater in some locations and is dependent on the values at the site and surrounding and how it is to be operated, as well as the size of the footprint.

Dot point four asks proponents to identify 'How risks associated with natural events have been considered' but fails to set any limits on management of these risks e.g. area of vegetation removed to reduce fire risk.

Dot point five asks proponents to identify 'Any services and/or public utility requirements' but does not relate these to the potential impacts on natural and cultural values.

Given that you will make the final decisions on particular development proposals and that you are the minister responsible for legislation governing the management and status of reserved land, we hope that you can provide further details regarding the environmental and cultural heritage assessment criteria and are willing to meet with us to discuss our concerns regarding this process.

We would also like to take this opportunity to discuss a number of other smaller issues, including the timetable for the revision of the Tasmanian Wilderness World Heritage Area Management Plan which is currently underway and obtaining some updates on the announcements made in the recent State budget.

The TCT and TNPA hope to meet you in the near future.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P. McGlone'.

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A handwritten signature in black ink, appearing to read 'R Campbell'.

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