



28 March 2021

Natural Heritage Policy
Natural and Cultural Heritage Division
DPIPWE

LAND TENURE WITHIN THE TASMANIAN WILDERNESS WORLD HERITAGE AREA (TWWHA) RESERVATION OF FUTURE POTENTIAL PRODUCTION FOREST LAND (FPPFL) AND PERMANENT TIMBER PRODUCTION ZONE LAND (PTPZL)

This letter is, in part, a response to the invitation to comment on the recently announced proposal¹ for the reservation of FPPFL within the TWWHA.

Background:

- The TWWHA was most recently extended in 2013, resulting in the inclusion of a large number of small reserves and some other tenures (TWWHA Management Plan 2016, pages 20-23). Previous major boundary extensions have promptly been followed by a rationalisation of the reservation status of land within the TWWHA.
- Most of these small reserves are conservation areas and regional reserves which allow limited exploitation of natural resources. Given the state government's policy of not allowing commercial logging, including harvesting of special species timbers, and mining within the TWWHA (an undertaking reiterated in the TWWHA Management Plan 2016; page 215), there is no obvious reason why most, if not all, of these reserves and some of the other tenures should not be incorporated into the most appropriate national park.
- The information on website referenced above regarding proposed zoning is inconsistent. The text in the FAQ page states:
The FPPFL, to be reserved under the Nature Conservation Act 2002, will be zoned as recreation or self-reliant recreation. These zones have already been determined and outlined in the TWWHA Management Plan.
The 'Map of zones over FPPFL' provided on the website and the map on page 219 of the TWWHA Management Plan both show several of the FPPL blocks on the western side of the Mersey Valley zoned predominantly as wilderness. The proposed zoning of these areas needs to be clarified.
- The current Mole Creek Karst National Park Management Plan 2004 includes (page 77) the following policies:
As opportunities arise, pursue options to incorporate within the park areas which will:
 - *improve protection of important natural or heritage values including karst;*
 - *protect the integrity of the park;*
 - *assist in more effective management; and*
 - *provide opportunities for, or improve presentation of, the park and the provision of visitor services and facilities.*

Several of the FPPFL blocks currently proposed for reservation adjoin parts of the highly fragmented Mole Creek Karst National Park. The above policies require these

¹ <https://dPIPWE.tas.gov.au/about-the-department/reservation-of-future-potential-production-forest-land>

FPPFL areas be considered for incorporation into the national park. The TNPA also advocates the inclusion of all adjoining land containing high conservation value karst features.

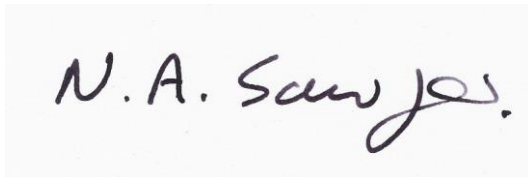
- Recommendation 11 of the 2015 ICOMOS/IUCN Reactive Monitoring Mission to the Tasmanian Wilderness, Australia states:
Future Potential Production Forest Land (FPPFL) within the property should not be convertible to Permanent Timber Production Zone Land (PTPZL) and should be granted status as national park.
- According to the TWWHA Management Plan 2016, the TWWHA includes the following:
 - FPPFL (unallocated Crown Land)25,428.4 ha
 - FPPFL (Hydro Tasmania)9,734.9 ha
 - PTPZL.....942.3 ha

It is unclear why the reservation class of only 'part of' the Crown Land FPPFL, none of the Hydro Tasmania FPPFL, and none of the PTPZL, is being canvassed at this time. According to a letter from Minister Jaensch (undated, received by email 24 March), the remainder of the unreserved land in the TWWHA, including land managed by Hydro Tasmania, will be included in the second stage. It is also unclear why the only categories of reservation proposed are conservation area and regional reserve.

The most appropriate default tenure for a World Heritage Area is national park and all of the above considerations constitute a strong argument for a timely review of the reservation status of all of the existing non-national park reserves and other tenures (including all of the FPPFL and PTPZL) within the TWWHA. There is considerable scope for simpler and more appropriate land tenure within the TWWHA by incorporating most of these into the most appropriate national park.

Such a review should be based on an analysis of the values of all areas and consideration of the most appropriate future reservation status, which is national park in almost all cases. It also provides the opportunity to create new national parks based on ecological boundaries, such as a kooparoona niara (Great Western Tiers) National Park, and a contiguous Mole Creek Karst National Park. This review should be followed by a public comment period informed by the relevant information.

Yours sincerely,



Nicholas Sawyer, President, TNPA

cc

- Minister Jaensch
- Jason Jacobi (Deputy Secretary, DPIPW)
- Minister Ley