Tasmanian National Parks Association

An independent Voice for Tasmania's Parks

Tasmanian Parks and Wildlife Service
GPO Box 1751
Hobart TAS 7001

18 March 2022

To Whom It May Concern,

Draft Lower Gordon River Recreational Zone Plan

Thank you for the opportunity to provide comment on the draft Lower Gordon River Recreational Zone Plan.

Launched in September 2001, the Tasmanian National Parks Association (TNPA) is a non-profit, non-government organisation which gives the public a voice on issues that affect Tasmania's National Parks and other conservation reserves. Like similar associations in other Australian States, the TNPA provides a link between the community, park policy makers and other government and non-government organisations to identify and address issues concerning the ongoing management of Tasmania's reserve system and other areas of high conservation status. The TNPA's membership reflects a range of interests and expertise in relation to reserved land, and it has within its membership considerable expertise in reserved land management and in natural and cultural values management.

Our following submission is divided into two sections. We first provide some general comments on the overall draft Plan before providing more detailed comments on specific aspects of the draft Plan.

The TNPA would be happy to meet with the Tasmanian Parks and Wildlife Service to discuss our submission further if that would be useful to you. Please contact me if you would like to meet or would like further information on, or clarification of, any points in our submission.

Yours sincerely,

N. A. Sawyer

Nicholas Sawyer

President, Tasmanian National Parks Association

Postal address: GPO Box 2188, Hobart Tasmania 7001
Email: info@tnpa.org.au • Web: www.tnpa.org.au

The TNPA acknowledges the First Nation peoples of lutruwita (Tasmania) and their enduring connection to country. We pay our respects to their elders past and present. We also acknowledge that their land was taken, and sovereignty was not ceded.

General Comments

1. The TNPA would like to congratulate the Tasmanian Parks and Wildlife Service (PWS) on making available the Pre-Draft Public Submissions[1] on the previously released *Lower Gordon River Recreation Zone Plan Background Report*. We hope that this practice will also be followed for this current Draft Plan and for all submissions on future documents released for public comment by the PWS.

2. It is stated that "*The Plan replaces the Lower Gordon River Recreation Zone Plan 1998 and provides area-specific guidance and priorities for management in, and adjacent to, the Recreation Zone*." It is also stated that "*The scope of the Plan is limited to the management of recreation, including tourism activities and associated development, and its impacts within the plan area.*" However, limiting the scope of the Plan in this manner ignores other management issues, such as the Middle Gordon Power Scheme, that have had, and continue to have, a significant impact on the values of the Lower Gordon River Recreation Zone (LGRRZ). Many such issues are also not adequately acknowledged or addressed in the over-arching 2016 TWWHA Management Plan either, leading one to ask where such issues will be addressed. In contrast the stated objective of the 1998 Plan was "*to prescribe management policy to conserve the environment of the lower Gordon River and provide the environmental framework within which the river can be presented to visitors.*" This broader focus allowed consideration of all management issues impacting on the values of the LGRRZ and such an approach should be retained in the revised Plan. Some additional comments towards achieving this are provided in the next section below.

3. The LGRRZ Plan should also explicitly acknowledge that the Lower Gordon River (LGR) is a distinctly altered landscape due to the environmental legacy of the Middle Gordon Power Scheme completed in the early 1970s. This includes the impacts of the seasonal changes in the flow, temperature and chemistry of the riverine biota, including the loss of the meromictic nature of some riverside lakes (Lakes Fidler and Morrison and Sulphide Pool). In scientific terms, the meromictic lakes are arguably significantly more important than the birds, Huon pine and other features discussed at length in the draft plan, because such lakes a) occur nowhere else in Australia and b) are under severe threat, or may have already effectively died. Again, some additional comments are provided in the next section below.

4. At least, a section on past impacts due to previous government policies of hydro-industrialisation is required, noting that rehabilitation of these impacts is currently beyond the objectives of this plan.

5. Finally, it is stated that "*the Plan is intended to be read in conjunction with the Background Report*." However, we consider, and have noted previously[2], that the background report has deficiencies. While we strongly argue that the Background Report should be updated to take account of the deficiencies noted in the public submissions[1], we also argue that the LGRRZ Plan should be a stand-alone document as it is unlikely that readers of this Plan will also read the Background Report. In particular, relevant sections of the Background report (e.g. Character and values of the lower Gordon River) need to be more fully summarised and incorporated into the LGRRZ Plan.

1. https://parks.tas.gov.au/Documents/Lower%20Gordon%20River%20Recreation%20Zone%20Plan%20-%20Pre-draft%20public%20submissions%202021.pdf
2. https://tnpa.org.au/lower-gordon-river-recreation-zone-plan/

Specific Comments

As outlined in our commentary and in the following sections there is considerable scope for improving the draft LGRRZ Plan. In several instances additional text is appropriate or desirable and we have provided proposed text; the text highlighted in red are suggested additions to the text in the Plan.

Chapter 1: Introduction

1. The current introductory statement that just describes the extent of the Lower Gordon River Recreation Zone (LGRRZ) is a very poor introduction to the document and Plan. More suitable would be an introductory statement that provides a short summary of its values and history. A suggestion follows:

   1.1 Background

   The Gordon River has long been one of the State's major tourism drawcards with cruises on the river being one of the most popular visitor destinations within the Tasmanian Wilderness World Heritage Area (WHA).

   The natural values of the lower Gordon River were first acknowledged when part of the area was proclaimed a public reserve in 1908. The Gordon River Scenic Reserve extended this in 1939. This reserve was then incorporated in the Franklin - Gordon Wild Rivers National Park, proclaimed on 13 May 1981. The park became part of the Western Tasmania Wilderness World Heritage Area on 14 December 1982. The World Heritage Area, and subsequently the national park, were expanded as the Tasmanian Wilderness World Heritage Area (TWWHA) on 12 December 1989. This area included most of the remaining, then-unreserved lower Gordon catchment.

   In recent decades some of the natural values of the lower Gordon River have been, and continue to be, impacted by the environmental legacy of the Middle Gordon Power Scheme completed in the early 1970s. This includes the impacts of the seasonal changes in the flow, temperature and chemistry of the riverine biota, including the loss of the meromictic nature of some riverside lakes (Lakes Fidler and Morrison and Sulphide Pool).

   Tourist visitation to the lower Gordon River has a long history, and the remains of early facilities were noted near Sir John Falls by a visitor in 1959. Up until the 1970s tourist cruises were conducted at a leisurely pace and were mostly full day trips. Investigations of the hydro-electric development potential of the area led to the Gordon-below-Franklin dam proposal in 1979. The ensuing debate and 1983 High Court decision preventing construction of the dam considerably raised the public profile of the area. High speed cruise vessels, which made half day trips possible, were introduced around that time. Tasmanian visitor survey data indicates that during the period 1993 - 1996 approximately 110 000 tourists visited the lower Gordon River annually. But, these cruises resulted in serious and irreversible damage to the river's banks. Modern low wake cruise vessels and speed limits introduced in the early 1990s have addressed this problem. At present, tourist access to the area is predominantly by daily commercial cruises operating out of Strahan.

   This Recreation Zone Plan, (hereinafter referred to as the 'plan') seeks to ensure preservation of the unique and globally significant environmental, cultural and World

Heritage values of the lower Gordon River whilst facilitating presentation in the form of long term sustainable recreational and tourism use.

2. After adding new 1.1 Background section, renumber existing sections 1.2 to 1.5.

3. Add the following sentence (taken from section 5.2) to the end of the new sub-section 1.5 Scope of the Plan.

   The Plan is intended to apply for a 10-year period, at the end of which there will be a thorough review and evaluation of its effectiveness and the currency of its vision and objectives.

Chapter 2: Values and Experiences in the Zone

4. Insert the following new paragraph after the 8th paragraph beginning "From a geoheritage perspective…":

   The lower Gordon River is also the only Australian river with extensive levee bank and flood basin deposits in a cool temperate rainforest environment. This area contains exceptional examples of meromictic lakes, a very rare phenomenon. The levee bank - flood basin - meromictic lake landform assemblages are of international geo-conservation significance. However, in recent decades these landforms have been heavily impacted by the change in river regime associated with the operation of the Middle Gordon Power Scheme and the unfettered operation of tourist cruise boats during the 1980s.

   The absence of a statement about these lakes fails to acknowledge both past impacts on World Heritage (WH) values and the associated need or ability to rehabilitate these values (included in the objectives of the 2016 TWWHAMP). A failure to acknowledge such incremental losses, together with a lack of acknowledgement of causes, results in a ratcheting down of natural and heritage values to be conserved and passed on to future generations.

5. It is a great pity that the extensive description of values provided in the 1998 Plan (4-5 pages) has been whittled down to the brief one-and-a-third page description here. Consideration needs to be given to expanding this section so that a fuller description of WH and other values can be incorporated within this document. After all, very few readers are likely to read the Background document (which has its own deficiencies, as we have previously noted).

6. There needs to be short summary describing the threats to these values that need to be managed: e.g. Environmental (bank erosion), change in river regimes (hydro), natural (impacts on wildlife), wilderness (increase in use and noise), weeds, fire, etc.

Chapter 3: Vision and Objectives

7. Apart from the overarching vision and objectives for the management of the TWWHA as a whole (which are high level), as set out in the TWWHAMP, there is also a need to specify the vision and objectives specific to the LGRRZ (as was done in the 1998 Plan). Otherwise, what are the specific management actions in the Plan trying to achieve? While section 3.2 specifies the vision specific to the LGRRZ, there is at present no section that outlines the specific objectives for management of the LGRRZ. This is a major shortcoming that needs to be rectified. The following suggestion is provided:

3.3 Objectives specific to the Recreation Zone

The primary objective of the plan is to ensure management of the LGRRZ as an integrated, accessible TWWHA destination for visitors, which has highly significant, but fragile landforms, diverse natural ecosystems, rare species, high natural scenic quality, and high wilderness values and remoteness which set it apart from other TWWHA visitor destinations.

More specifically, the objectives of this plan are to:

- Maintain the uniqueness of the area and its aesthetic, cultural and environmental values as described in Section 2.
- Restore the natural propensity of the river banks towards stability or deposition (as appropriate to particular sites).
- Provide recreation opportunities consistent with resource protection and maintenance of scenic quality.
- Conduct environmental and cultural research as required in order to effectively manage the area and achieve the above objectives.

Chapter 4: Future Recreational Management

8. While it is stated in section 4.1 that "*Priority conservation issues for the Recreation Zone are the protection and conservation of the sensitive natural values…*", management of conservation issues within the LGRRZ has been essentially limited to the management of impacts by motorised vessels. This is more limited than the management of environmental issues described in the 1998 Plan which has a section on river regulation (and changes resulting from the Middle Gordon hydro scheme) and such a section should also be included in this updated plan.

4.3.1.1 All zones

Speed Limits

9. Applying a maximum speed limit of 5 knots to all vessels upstream of the river mouth ignores the findings of the latest Lower Gordon River erosion monitoring report (Bradbury, 2021) which states that:

   "*Despite some recovery in the form of deposition on estuarine and alluvial flats and on some levee foot bars, all bank types in all zones remain susceptible to wave erosion" and that "some erosion remains attributable to cruise vessels. That is counter to the Lower Gordon River Recreation Zone Plan (PWS 1998) management target of zero wash induced erosion. Theoretical considerations, centered on an energy threshold that must be exceeded before erosion can occur, suggest that continued erosion by cruise vessel wave wake could be avoided by a slight (0.5 kt) reduction in speed*."

   Given the earlier statements at the beginning of this Chapter "*to take account of the precautionary principle in making a decision in relation to the property*", that "*a lack of full scientific certainty should not be used as a reason for postponing measures to prevent degradation of the natural and cultural heritage of a reserve or zone where there is a threat of serious or irreversible damage*", and that "*areas of active erosion are still evident*" (p.15)**,** in order to avoid continued erosion the maximum speed limit needs to be reduced to no more than 4.5 knots.

Hence, change first sentence on Speed Limits as follows:

A maximum speed limit of 4.5 knots applies to all vessels upstream of the river mouth southeast of 377 510E 5300 758N.

4.3.1.4 Zone 3

Page 18.

10. It is stated that "*research has indicated that it is unlikely that any motorised vessel could transit Zone 3 without causing some erosion*" and that "*As of 2021, monitoring of the sensitive levee banks found Zone 3 to be at, or near, it's carrying capacity. Therefore, a precautionary approach will be taken in the management of Zone 3 and visitation by motorised vessels to this section of the river will not be encouraged or promoted*." It therefore seems both contradictory and disingenuous to consider "*Any additional commercial use of motorised vessels in this zone…*"

    Based on the results and recommendations of past and ongoing monitoring, and incorporation of the precautionary principle, the appropriate management prescription in this zone needs to be made clear: i.e. No further commercial use in this zone will be allowed. To this end,

    i) delete the final three paragraphs in this sub-section, beginning "*Any additional commercial..",* and
    ii) add the following words to the end of the fifth paragraph (and new final paragraph) in this sub-section beginning "*As of 2021… and visitation by motorised vessels to this section of the river will not be encouraged or promoted and further expansion of any commercial use in this zone will not be permitted*."

11. On page 15 it is noted that in mid-2020 a voluntary online registration system was introduced by the PWS to manage daily walker departures and campsite occupancy to reduce the potential for long-term damage to sensitive vegetation on some of the State's popular and remote walking tracks. Based on this precedent, the draft Plan proposes a similar system to monitor private vessel use on the LGR. This Management Action should be further detailed as follows.

    Page 20: Add words indicated to sentence (second last dot point, first column):

    - Investigate and trial the use of an online registration system for all private vessels to monitor visitor numbers, vessel type and level of use in all zones.

12. The 1998 LGRRZ Plan stated: "*The cumulative effects of the potential number of vessels operating on the river and the frequency of trips will also need to be considered in any decision to vary existing services or establish new ones. Once the carrying capacity of the river is established with confidence expansion of commercial use will be considered, provided that the environmental impact of such use is within the limits of acceptable change*." Again, taking account of systems in place for bushwalkers, it can also be noted that the use of permits has been introduced on some walking tracks to limit numbers to within sustainable or carrying capacity limits (e.g. Overland Track). Noting that monitoring within Zone 3 indicates that vessel usage is already at, or near, it's carrying capacity (and perhaps exceeding such a limit in Zone 1 given continuing erosion) it would seem appropriate that a permit system would be appropriate for private motorised vessels on the LGR. In this regard, a carrying capacity limit should be determined within each zone and a permit system should be established to keep total boat traffic (private and licensed commercial) in all zones within this capacity.

Page 20: Addition of the following management action is therefore recommended:

- Investigate and determine the within-zone present usage and carrying capacity of the lower Gordon River and trial the use of a zonal permit system for private motorised vessels to limit and restrict usage within identified carrying capacities.

4.4.2 Minimising wave wake

3rd paragraph.

13. It is clearly inconsistent, inappropriate and contrary to Plan objectives allow vessels that do not meet the Wash Rule to remain operating, especially in light of continuing erosion, the zero wave wake erosion objective, and the use of the precautionary principle. Also, what is the difference between "vessels that test poorly against the Wash Rule" and "vessels that do not meet the Wash Rule"? In both situations they fail the Wash Rule. Hence, make following changes to text:

    "Existing vessels that test poorly against or do not meet the Wash Rule ~~are encouraged~~ will be required to be modified or replaced with vessels with low wave wake design that meet zero wave wake erosion objectives. ~~Current vessels that do not meet the wash rule may have access phased out, limited, or be required to replace or modify the vessel to reduce wave wake where practical upon licence renewal~~".

4.4.3 Renegotiation or cancellation of licences

14. The provision for restrictions on, variations to, or cessation of the business is stated to be conditional "*if riverbank erosion associated with commercial tourism operations on the river occurs*". However, it is stated on page 15 that "*areas of active erosion are still evident*". As such, if this management prescription is to be acted upon, then restrictions on, variations to, or cessation of the business are required now and should be outlined in this Plan.

15. The draft Plan makes no mention of potential impacts on wildlife. Hence, add the following new sub-section.

    4.4.7 Other Impacts

    Feeding of wildlife by tourists or tour operators is not permitted for several reasons:

    (1) It can cause sickness such as lumpy jaw.

    (2) Artificial feeding can cause animal numbers to build up to unnaturally high levels. This causes a problem during the off-tourist season as there is not enough food available, resulting in impacts on the vegetation and starvation of animals.

    (3) Some species of animals become pests as a result of feeding and become more aggressive in their demands for food. Elsewhere, this has led to people being injured.

    (4) The Parks and Wildlife Service has a policy of 'keeping wildlife wild' in national parks.

    There are some indications that a number of bird species may have already been affected by frequent motorised traffic on the river. Birds such as the Black Swan, Pacific Black Duck, Great Cormorants and in particular the Azure Kingfisher are sensitive to disturbance. A decline in these bird species as a result of motorised traffic has been observed at Birch's inlet and other areas. Similarly, birds such as the White-Bellied Sea

Eagles and Wedge-Tailed Eagles will not usually nest along river edges where there are regular disturbances.

4.5 Data provision requirements

16. A lack of data on the number of people currently visiting sites within the LGRRZ makes it difficult to plan and manage. We therefore strongly support the management action that data collection as specified in this section be made a mandatory part of the licensing conditions for all commercial operations within the zone. As noted previously, data collection should also involve a registration system for non-commercial users.

4.6 Motorised water sports

16. The statement *"…it is prudent to not increase activity in Zone 3 where there is a risk of exceeding the carrying capacity in Zone 3*" is welcome. However, this statement is inconsistent with the statement on p18 about additional commercial use. See also our previous comment above concerning 4.3.1.4 Zone 3.

17. We support the continued ban on waterskiing, wakeboarding, hovercraft and the use of personal watercraft such as jet-skis in the LGRRZ.

4.7.1 Landings and take-offs

18. Given the lack on shore facilities for visitors within Zone 2, aircraft landings should be limited to Zone 4 only. This recommendation is reinforced in the 2nd paragraph where it is stated that "Whenever possible, landings and take-offs are to be conducted in the Primary Landing Area in Zone 4."

    We understand that there have been a limited number of landings in recent years so it seems hard to justify increasing landings to 100 per year.

4.11 Toilets and waste management

19. Based on statements in the public submissions in relation to Planning Stage 3, there appears to be an issue in relation to the lack of a toilet at the Sir John Falls campsite, likely due to the distance to the toilet at the Sir John Falls Hut (340m, a problem no doubt increased at night). While in the short-term camping at the Sir John Falls campsite should be limited to commercial rafting groups with carry-in/carry-out toilets, there may be a need to consider whether the Falls campsite remains open at all (see comment below).

4.18 Sir John Falls

20. It is stated that, subject to the upgrade of the walking track between Sir John Falls campsite and the Sir John Falls Hut, camping by commercial groups at this site will be discouraged (and non-commercial groups banned). While we acknowledge that some commercial groups capture and transport their own toilet waste, given the previous comment above about the issue relating to a lack of a toilet at the Falls campsite, and that upgrading the track is certainly not going to address the toileting problem as it is too far for many to bother walking, would it not be prudent to close the Falls campsite instead of just discourage its use – which is not likely to happen. The Sir John Falls area should therefore be closed to camping.

4.19 Viewfields

21. The heading name is a poor choice and limiting – rename to Wild Character

22. Add a new sentence at the start of this paragraph, modify second sentence, and add additional paragraph as indicated here:

    4.19 Wild Character

    The lower Gordon River is valued nationally and internationally for its tranquillity and for providing an immersive experience of wild nature. Maintaining the viewfields and the undeveloped wilderness aesthetic of the river is therefore central to the visitor experience and the recreation opportunities it provides. Protection of the riverbanks from erosion caused by the wave wake of motorised vessels (sections 4.3 and 4.4), and limiting the provision of moorings, jetties, and pontoons to specific sites (Section 4.5) are measures outlined in previous sections. It is also important to ensure the visual impact of existing structures and visitor sites on the natural setting of the river is minimised.

    The noise of motorised vessels or other mechanised equipment negatively impacts the tranquillity and wild character of the LGRRZ. Hence, it is important that such impacts be minimised, together with the social and physical impacts of visitors, whether commercially hosted or not.

23. Change DO.26 to the following:

    DO 4.26 The undeveloped wild character and tranquillity of the LGRRZ is maintained.

    Add to Management actions:

    - All future tourist cruise boats are electric-powered and quiet when operating on the Gordon River.

4.20 Fire

24. Add to the sentence at the start of this paragraph, and modify second sentence as indicated:

    Frequent fires are not part of the natural order in this part of the TWWHA, which includes extensive rainforests, and are likely to result in ecological shift. Therefore (~~in the TWWHA~~) the risk of bushfire to the area's natural and cultural values and visitor safety must be actively managed.

4.21 Biosecurity

25. At the end of the first paragraph, add the sentence:

    As more and more visitors access the area the potential for the introduction of further exotic species such as weeds, pathogens, etc. should not be overlooked. Such introductions are often detrimental to existing resident species.

26. Add new sub-section:

    4.24 Caves and karst

    The significance of the Gordon River karsts will not be fully identified until a comprehensive and systematic multidisciplinary survey has been undertaken. Until then any potential disturbance to caves and karst features should be minimised.

DO 4.33 Disturbance of caves and associated features kept to a minimum until a systematic scientific survey has been conducted

Management actions.

- Archaeological finds should be reported to Parks and Wildlife Service and Aboriginal Heritage Tasmania.
- The Parks and Wildlife Service geomorphologist (karst) should be consulted before caves in the plan area are entered.
- Where necessary, interpretative material should be prepared detailing the nature and vulnerability of karst in any area likely to be frequented by either private or commercial tours.

Chapter 5: Future Recreational Management

Page 35. KDO 1.

27. Given that the findings of the most recent Lower Gordon River erosion monitoring report (Bradbury, 2021) states that "*some erosion remains attributable to cruise vessels*", then achievement of KDO 1 is already at an Unacceptable level. A stronger management response is required. However, as many of the management prescriptions in the draft Plan related to the activity of motorised vessels are similar to existing prescriptions, then one can infer that these prescriptions are not a strong enough management response to prevent ongoing failure to meet KDO-1. See previous comments above recommending stronger management prescriptions.

Page 35. KDO 4

28. How are random compliance checks of the speed of private vessels to be undertaken? This needs to be clarified otherwise this KDO is rendered meaningless.

29. There is a need for an additional KDO to monitor the 'wild character' of the LGRRZ, as the central issue that the Plan should address is the maintenance - and enhancement where possible - of the wild character of the river and its environs. This objective is officially implied by the names of the reserves intended to protect it, the Franklin-Gordon Wild Rivers National Park and the Tasmanian Wilderness WHA.

30. Most KDOs in the draft Plan only address present-day recreational issues. Notwithstanding the planned ten-year life of the LGRRZ Plan (and noting that past plans have endured for far longer), management of the LGRRZ should also take a longer-term view, especially with regard to identifying issues that may require ongoing research before they can be adequately addressed. Failure to do so will inevitably lead to management problems and the possible irretrievable loss of natural values. The existing damage to or loss of the meromictic lakes is a case in point. As such, something like sub-section 9.2 in the 1998 LGRRZ Plan needs to be re-instated:

    5.2 Further research required for effective management

    In order to sustainably manage the area a sound scientific database is required. In light of the magnitude of threats to the lower Gordon River, and the limited understanding of many pertinent aspects, it should be recognised that long term sustainable management will take considerable effort. This research should include, but not be limited to, the following topics.

- Sustainable management is dependent upon an understanding of the carrying capacity of the river, which remains largely unknown. Substantial research needs to be directed towards establishing the limits of acceptable change and the level of impact that may be considered sustainable.
- Provide for or prescribe the active rehabilitation of remaining impacts from past hydro-electric development activities, especially for the meromictic lakes.
- An ecological study of estuarine and alluvial banks, as well as karst areas is required similar to that already conducted on the levee bank sections of the river. This is considered a vital part of the information base necessary for long term sustainable management of the area.
- Comprehensive dating of fluvial and estuarine landforms is necessary to determine the long term erosion/deposition rates that are considered required knowledge for sustainable river management planning and the establishment of limits of acceptable change.
- Dating and analysis of ancient cave sediments should be undertaken to provide information about i) rates of river incision/uplift of the surrounding erosion surface, ii) vegetation history from pollen incorporated in sediment, iii) faunal history from vertebrate bone deposits and iv) the height and frequency of extreme floods. This data would be of value in reconstructing the geomorphic development of the entire area.
- The sub-catchment provenance of sediments deposited within the Gordon estuary is unknown. An examination of the middle Gordon impoundment to determine the volume of recent sediment trapped there needs to be undertaken as the first step in provenance analysis. If large volumes of sediment have accumulated at discharge points or elsewhere behind the dam since closure, a negative downstream sediment budget and lack of sedimentary replenishment would be implicated as a subsidiary factor in the erosion problem. This sort of data is also necessary for the calculation of rehabilitation rates.