Friday 27th February, 2015

Representation TWWHA Management Plan
The Director of National Parks and Wildlife
GPO Box 44
HOBART TAS 7001

Dear Sir/Madam,

SUBMISSION AS AN OBJECTION TO THE DRAFT PLAN OF MANAGEMENT FOR THE TASMANIAN WILDERNESS WHA

Introduction -
National Parks are set aside from development and wilderness areas are sacrosanct

The Colong Foundation for Wilderness Ltd is Australia’s longest-serving community advocate for wilderness.

Wilderness protection is both a management objective and a tool for protecting the integrity of this extraordinary World Heritage Area. It inspires many who have dedicated their lives to protecting areas like the Tasmanian Wilderness World Heritage Area (TWWHA), including those in government, parliamentarians of various persuasions, the conservation movement and the Aboriginal community.

The proposed reversal of wilderness management that is currently practised over 90 per cent of this World Heritage Area is an attack on the wilderness idea. If this plan is adopted, Tasmania will be seen as the State that systematically obliterated one of the best wilderness areas in the Southern Hemisphere through a deliberate program of park mismanagement. Such cynical political leadership and signal failure in vision for a World Heritage listed property will make an indelible mark on the state’s reputation. Tasmania will become the ‘once was’ wilderness state; a pariah and a land of disappointment.

Many Australians and international visitors love Tasmania’s wilderness and they will control the language of this park management debate. Tourists will say Tasmania has blighted its green credentials and damaged its brand.

Australians understand national parks as land set aside from development. Australians do not consider national parks as lands of opportunity for the construction of exclusive-built, saleable products to be developed by the tourist industry as it sees fit according its ‘master plan’.

The draft plan of management confuses the development of built tourist facilities with tourism. The plan merges provision of built facilities with visitor use that is free or cheap, to create an agenda for park development. It is a strategy that benefits commercial interests who want to build facilities in wilderness against broad public interest in keeping national parks for nature.
The Tasmanian Government’s process has bypassed the public consultation and review process by not only progressing consideration of tourist infrastructure and access proposals in advance of the draft plan, but also through a tourism master plan determined behind closed doors. The Government has assumed the public will accept that national parks and wilderness can be developed, when in fact public opinion has generally been opposed to these ideas for generations.

The Tasmanian Government through this draft plan is seeking to make the Tasmanian Wilderness ‘investor-ready’ but it couldn’t wait until the preliminary planning was done before seeking tenders from the tourism industry.

The bias of the Tasmanian Government against wilderness and national parks, for commercial and other built facilities, is blatantly illustrated by its decision to allow that industry to make 37 expressions of interest before the plan is promulgated (SMH 16/1/15, pg 8). The Tasmanian Government has made up its mind before hearing the public’s views on accelerated development of pristine protected national park land which will reverse the trend of over 130 years of national parks history in Australia.

The tourism proposals favoured by the Tasmanian Government through its expression of interest process, discredits the draft plan. The public has had no say in these negotiations between the Tasmanian Government and the tourism industry, and Government has not waited to hear from the public regarding its views. So it is of no surprise that tourism development is allowed in the current wilderness zone (see page 73, the first entry in the table of use).

As tendering and contractual negotiations are closed to the public, the public does not know if the Government is negotiating possibly exclusive commercial rights to this wilderness coast. With developer profits and inequitable costs on the parks agency, independent visitors will be denied the prime camp sites these facilities will be built upon. The grievous and irreplaceable loss of some of the best wilderness areas in the Southern Hemisphere will see intrinsic values ignored on economic balance sheets. No bio-banking or ecological offset can replace or compensate the loss of Tasmanian Wilderness and neither will any management benefit from these commercial arrangements, if it ever materialises.

For the above reasons, **the draft 2015 World Heritage Area Management Plan should be scrapped and a replaced with a plan that respects the Tasmanian Wilderness and all its heritage values.**

**Draft Management Plan Section 1 – Basis for Management**

**The TWWHA should be extended and park management amended so that it is compatible with the legal management framework**

**Low Rocky Point National Park addition**

The TWWHA should be extended east to the coast extending from Cape Sorell to Low Rocky Point. Mineral interests in this area should lapse on expiry of current tenure.

The national park extension would ensure that this important wilderness coast is not slowly degraded by mineral exploration, private shacks or off-road vehicle abuse.
The draft plan ignores its governing legal framework

The draft plan of management is contrary to the objectives of the National Parks and Reserves Management Act 2002 that binds the Crown (see Schedule 1).

The management objective specified in Schedule 1 clause (j) is to preserve the natural, primitive and remote character of wilderness areas. The draft plan of management does not comply with this objective which prevails over the objectives for resource management and planning outlined in Schedule 2 of the Act. The Schedule 2 objectives for resource exploitation are subordinate to and do not override the national park objectives of Schedule 1 of the Act. The primary objectives of the National Parks and Reserves Management Act 2002 outlined in Schedule 1 require that the Tasmanian Wilderness World Heritage Area must be managed primarily for nature conservation.

Objective (h) in Schedule 1 states that tourism, recreational use and enjoyment must be consistent with the conservation of the national park’s natural and cultural values. The draft management plan fails to do this and has lost focus with the legislated conservation purposes of parks in the pursuit of economic development. National park use and management must be ecologically sustainable, before any consideration of social and economic matters specified under other legislation.

The draft plan emphasises natural values as a resource for human use, presenting superlative natural values as “instrumental” or “utilitarian”, rather than as “intrinsic”. Ecological systems and the species they contain have a right to exist in the Tasmanian Wilderness and not just for human use. Intrinsic values need to be respected, managed and protected.

To reassure the community the Tasmanian Government needs to upgrade the protection of heritage values, including wilderness. Otherwise, the community at large will lose faith in government management of the Tasmanian Wilderness.

The guiding vision of the TWWGA draft plan is to identify, protect, conserve and present the World Heritage and other natural and cultural values of the TWWHA and to transmit that heritage to future generations in as good or better condition than at present [page 33].

The abolition of wilderness from the draft means that the general thrust of the plan is hostile to the draft’s vision statement. The management plan will deny wilderness heritage to future generations. Park management should not provide for interests unsympathetic to national parks or remove wilderness management, as this is contrary to management objectives of the Act.

To stop the loss of Tasmania’s high quality wilderness areas, wilderness-specific state legislation is necessary, in a separate Wilderness Act. The case for such legislation is indicated by the neglect of the wilderness objective [Schedule 1, clause (j)] of the Act. Intergenerational equity principles should ensure that future generations are able to enjoy Tasmania’s best wilderness.

Wilderness values within the World Heritage Area need to be reinstated where they have been compromised. Existing development in wilderness should be removed, such as the artificial Lake Pedder impoundment and 4WD access along the Mt McCall road to the Franklin River. The place for commercial tourism facilities should be in towns and villages adjoining national parks were utilities like water, power and sewerage already exist, instead of making a mess of the national parks estate.
Additional tourist concessions proposed in the draft plan indicate the extent to which statutory wilderness management policy has been disregarded. There is no point in reserving national parks and setting these areas aside from exploitation to then to develop these same protected areas under secret state-sanctioned schemes, such as the shadowy Tourism Master Plan.

The draft plan should instead protect the TWWHA, particularly where an activity is known to be damaging to heritage values, like logging, horse riding, off-road vehicle use, built accommodation and increased aircraft access. The National Parks and Reserves Management Act 2002 should protect the Tasmanian Wilderness World Heritage Area!

**Draft Management Plan Section 2 – Statement of values**

Correcting omissions and errors made in describing heritage values

The draft management plan presents only a selection of the property’s values.

The draft plan of management notes that the World Heritage Committee will consider the Federal Government’s Statement of Outstanding Universal Value for the Tasmanian Wilderness World Heritage Area in mid-2015 (page 25). The draft plan’s statement of World Heritage values is incomplete and inconsistent when these are compared with the values statement on the Federal Environment Department’s website.

*The draft plan must be corrected to add omitted World Heritage values and remove inconsistencies with the listing statement, including those in regard to old-growth, tall-eucalypt forest values.*

For each of the seven World Heritage criteria that the Tasmanian Wilderness property satisfies, all qualifying attributes for each value of should be described in section 2 of the draft plan.

Qualifying attributes characterise the ‘Outstanding Universal Value’ of the Tasmanian Wilderness property and it is the property as a whole that possesses Outstanding Universal Value. The 1989 extension to the Tasmanian Wilderness was justified by its tall-eucalypt forests. These forests are a qualifying attribute of the property’s Outstanding Universal Value and should be described in section 2.

The draft plan of management operates on protecting discrete values and not the property as a whole. The draft plan is not compliant with the spirit and intent of the World Heritage Convention as the Outstanding Universal Value is not protected.

The draft management plan should be more even-handed in its presentation and description of all World Heritage, National and other heritage values, placing more descriptive emphasis on newly listed values or with new discovered attributes of those values, as well as those that have been previously neglected, such as Aboriginal heritage.

The Tasmanian Government should appreciate the intense, spiritual attachment of Aboriginal people to the land and recall the lack of environmental sympathy of the many people who have lived in the region since European settlement. The ecological impacts of Aboriginal occupation are dwarfed by those inflicted on the Tasmanian Wilderness since European settlement, especially those by the Hyro-Electric Commission and the loggers. Human history in the Tasmanian Wilderness, in turn, is
dwarfed by the tens of millions of years of ecological history that preceded it. These facts must inform a revised park management plan.

The failure to correctly describe all World Heritage values and acknowledge Australia’s obligation to protect the entire Tasmanian Wilderness WHA causes a contingent failure to adequately protect the omitted qualifying attributes for each value in the property.

The draft plan must have a correct and complete values statement. Once corrected the draft plan should be re-exhibited for further public comment and review.

The draft plan downplays the Tasmanian Wilderness’s natural values. The incomplete description and truncated discussion of natural values produces an extremely anthropocentric view of what conservation management is about. Nature-based management has been subordinated to visitor-based management that then takes the lion’s share of human and financial management resources for this World Heritage Area.

**Draft Management Plan Section 2 – Statement of values**

**Wilderness should not be maligned or degraded by inappropriate actions that spoil wilderness and associated scenic values**

The Operational Guidelines under the World Heritage Convention require that the Outstanding Universal Value of the Tasmanian Wilderness be protected, including its conditions of integrity and authenticity that must be sustained or enhanced over time (clause 96).

Clause 98 of the Operational Guidelines requires that legislative and regulatory measures at national and local levels should assure the survival of the property and its protection against development and change that might negatively impact the Outstanding Universal Value, or the integrity and/or authenticity of the property. State Parties should also assure the full and effective implementation of such measures.

The removal of the wilderness designation would be contrary to the spirit of clauses 96 and 98 as development of facilities will harm natural beauty, a World Heritage value. The development of visitor facilities in the wilderness will directly impact on naturalness and the perception of naturalness, harming this World Heritage value as well as ecological integrity.

The Tasmanian and Federal governments through these provisions are required by the Convention to protect the very high wilderness qualities of the Tasmanian Wilderness as defined through its World Heritage surrogate of natural beauty and by its ecological integrity, for which this property is world-renowned.

Australians have a pluralistic view of this property as a wilderness and an Aboriginal landscape in keeping with Australia’s multicultural foundations. The property is a remote, pristine Aboriginal landscape. It is unconstructive to portray wilderness as denying Aboriginal management and culture as it pits two sections of society against each other. The Colong Foundation is disappointed by the ‘wilderness is a racist concept’ allegation made in the draft plan which also proposes to introduce built infrastructure and modern technology into the wilderness.
As Tasmanian Aboriginal Centre chief executive Heather Sculthorpe has stated “That’s not the reason — they are trying to use us by pretending that’s the reason. Many international legal definitions of wilderness allow for people to be in the landscape. This is a blatant attempt to drive a wedge between us and the environment movement. It’s a sham excuse for dropping the word ‘wilderness’ (the Australian, January 22, 2015).

The primary management objective for IUCN wilderness reserve category 1b is to protect the long-term ecological integrity of natural areas that are undisturbed by significant human activity, free of modern infrastructure and where natural forces and processes predominate, so that current and future generations have the opportunity to experience such areas (www.iucn.org/about/work/programmes/gpap_home/gpap_quality/gpap_pacategories/gpap_category1b).

Two of the four other IUCN wilderness objectives are: to enable indigenous communities to maintain their traditional wilderness-based lifestyle and customs, living at low density and using the available resources in ways compatible with the conservation objectives; and to protect the relevant cultural and spiritual values and non-material benefits to indigenous or non-indigenous populations, such as solitude, respect for sacred sites, respect for ancestors.

The Tasmanian Wilderness is the only World Heritage Area with Wilderness in its title. Abolition of Tasmania’s wilderness will damage Tasmania’s brand. Developing wilderness protected in a national park will not increase tourism, but rather irrevocably change it for the worse.

The wilderness zone should be retained, expanded in size to include the Low Rocky Point national parks extension and wilderness should be retained in the title for this World Heritage property.

Hunting

Hunting should not be described as a value under section 2.3, it is an inappropriate park use and is not a form of park presentation. Many Australians strongly disapprove of hunting in national parks and this activity should not be allowed in the TWWHA. Use of hunting dogs is cruel and inhumane.

Recreational hunting puts park users, including hunters, at risk of being shot or injured. Native wildlife will be shot, and knowledge of this practice is distressing to many Australian who believe that World Heritage Areas should be sanctuaries for wildlife. Park visitors other than hunters will find hunting very unsettling as it is a potentially dangerous activity where visitors can be mistaken as ‘game’.

Hunting should be banned in the TWWHA.

The Phytophthora quarantine overlay at Pine Land on the Central plateau should be retained.

Draft Management Plan Section 3.1.2.1, 3.6.3 6.3.4, 6.8 and 6.8 – motorised vessels

Use levels will allow unacceptable damage

Proposed use levels ignore the limits of acceptable change management methodology, and will permit unacceptable levels of degradation. Further, motor boats may be able to access the Franklin River and the Gordon River upstream of Angel Cliffs and jet skis can access most of Port Davey as
well as Macquarie Harbour shattering the peace and serenity. World Heritage will be placed in danger by this high impact uses!

From February 2004 to March 2013, estuarine banks near the river mouth were found to have eroded at double the average rate of that expected from sea-level rise alone, with an increasing trend evident. Erosion rates are declining in the zones above where commercial vessels operate (page 126).

Buried in the report in additional commercial tourism opportunities, is provision for an unspecified number of 24 bed floating hotels. These floating hotels would be in addition to those large tour boats already damaging the Gordon River, thus this proposal will degrade this wild river.

The TWWHA should be a marine sanctuary and commercial fishing should be prohibited within the marine sections of the TWWHA (page 81).

Jet skis and floating hotels should not be permitted and boat speeds and other restrictions lowered from 1999 levels to prevent environmental degradation. Motor boats should remain banned on the Central Plateau to protect natural quiet for visitors and water quality for the aquatic life in alpine lakes.

Draft Management Plan Section 3.2 – distribution of zones and table of use nonsense zoning

The draft plan reduces to nonsense the concept of zoning parks and reserves to regulate use, particularly in regard to wilderness management. The use table described for each proposed zone on pages 73 to 75 of the draft plan lacks credibility, as each zone allows built accommodation and aircraft facilities. If remote natural areas and all other zones are allowed to have visitor facilities, then each zone is in fact, by definition, a visitor services zone allowing associated infrastructure. In other words it is an ineffective zoning plan.

The approach taken in the draft plan 2015 is equivalent to a town planning scheme allowing high rise and factories in heritage precincts and residential areas. The proposal for built accommodation along the South Coast Track will deny future generations the experience of self-reliant walking on this wonderful wilderness coast. And the further commercial development proposed for Cradle Mountain indicates how facilities development can ratchet upwards once permitted in a pristine area.

The proposed built accommodation will put a barrier between nature and the human soul. Commercial facilities inside the Tasmanian Wilderness property exploit the wilderness coast and mountains, its existing funded park infrastructure, the on-going operational management costs and marketing benefits that are all subsidised by tax payers. The association is not a private/public partnership, it is a parasitic arrangement and commercial tourism is a cost to park management.

Built accommodation and associated infrastructure

The suggestion that accommodation in the Tasmanian Wilderness will somehow contribute to conservation is simply not supported by evidence. When Parks Victoria wanted to build a hotel in
Wilson’s Promontory National Park some years ago, there were more objections than for any previous development proposal in the State. New plans by the former Napthine Government to develop Point Nepean National Park are currently being opposed with equal vigour.

People want wilderness and national parks undeveloped. Even more so, as there’s more and more people, and less and less wilderness as time goes on.

Opening up wilderness to commercial accommodation and aircraft-based commercial tours would apply economic forces to these last areas where land is currently managed for nature conservation. Tourism infrastructure will concentrate on the most dramatic scenic areas, displacing existing users.

Through the secret tenders, it can be expected that the Tasmanian Parks and Wildlife Service will seek to sell their “product” for increased revenue to those who are easy to charge and likely to bring in the most money, i.e. high-end recreational users. This is the motive for providing more facilities in wilderness for those exclusive visitors who prefer to stay in built accommodation and travel through parks by aircraft. The tourism industry will profit more from parks through increased touring and development opportunities at the expense of conservation and the general public who love the Tasmanian Wilderness as it is, undeveloped. A better corporate outcome would be to protect the Tasmanian Wilderness by excluding tourism development and high impact aircraft use from these areas.

Adopting a business-like approach by focusing on marketing, promoting and facilitating commercial tourism facilities has resulted in park management being unduly influenced by those wanting to exploit national parks for profit, despite a stated concern for the World Heritage property.

The proposal for commercial accommodation at Lake Rodway behind Cradle Mountain would exceed the carrying capacity of the area, however, the proposed solution is a major track access upgrade to speed the visitors on their way. Proposed track upgrades and increased visitor accommodation will degrade the experience of this part of the TWWHA as the current experience of solitude and remoteness will be compromised.

The proposed extension of Visitor Services Zone (page 177) in the Cockle Creek area all the way to Fisher Point is opposed, as is the intention to permit tourism accommodation at Planters Beach. The proposed expansion of facilities at Melaleuca to accommodate a significant expansion of commercial tourism in this core park area, is also opposed.

Any accommodation and aircraft landing site development in the TWWHA could be challenged through the Federal Administrative Appeals Tribunal under the EPBC Act if World Heritage values are put at risk by the proposed activity. Development of the TWWHA and this plan of management are controlled actions affecting matters of national environmental significance. Further, any attempt to override the protection of World Heritage values by considerations of social and economic benefits, would be administrative actions that could be challenged through the Tribunal.

Decision-making

The Assessment Panel appointed by the government to evaluate proposals generated by the Expressions of Interest process must be at arms-length from government and proponents. Tasmania
is a small community and the potential for inappropriate decisions which benefit commercial interests against the broader public interest is highly likely, unless independent, transparent and accountable decision-making occurs. The Tasmanian Government has a very poor record of approving insensitive and inappropriate developments, like the Lake Pedder impoundment.

Draft Management Plan Section 3.6.2 – Logging of World Heritage native forests

Logging damages the World Heritage Convention

The hard work promoting the forests of the Styx Valley as the land of the giant trees was done previously by volunteer conservationists. The draft plan ignores the tourist potential of giant trees. The proposed recreation zone in the Styx, Tyenna and upper Florentine sections of the 2013 additions appear to be a contingent result of allowing inappropriate logging in these areas and are not supported. Such a zone will entrench high impact recreation activities in these forests.

The draft plan should propose a Giant Tree interpretive walk.

Higgs Track in the Great Western Tiers which was funded under a Commonwealth grant is an appropriate visitor asset that should be promoted and interpreted by administrative actions under the plan of management.

Maintenance of existing use patterns is inappropriate for the 2013 TWWHA extension area.

Proposals for zip-lining, all-terrain vehicles, downhill mountain-bike trails and designated four-wheel-drive routes are opposed as completely inappropriate in amongst these stands of majestic trees (page 137).

Proposed high impact logging will damage World Heritage values. The Draft Plan proposals for logging of World Heritage property, including the Styx, Weld and Florentine valleys, and in formerly protected forest areas, such as Drys Bluff, Meander Falls and the North Styx would ignite on-ground forest conflicts. Logging damaging the integrity of the World Heritage property would be contrary to clause 96 of the Operational Guidelines.

Special species timber is defined within the Forestry (Rebuilding the Forestry Industry) Act 2014. Trees including blackwood (*Acacia melanoxylon*), myrtle (*Nothofagus cunninghamii*), celery-top pine (*Phyllocladus asplenifolius*), sassafras (*Atherosperma moschatum*), huon pine (*Lagarostrobos franklinii*), silver wattle (*Acacia dealbata*) and ‘timber of any other species or timber with particular properties as may be prescribed through the associated regulations’ could be logged.

On-going forest logging under these arrangements is another threat likely to trigger an in danger listing for the Tasmanian Wilderness.

Logging within World Heritage listed forests must cease and be prohibited under the management plan, not only to protect these outstanding native forests, but also to retain the international standing of the World Heritage Convention and its role in the maintenance of natural heritage.
Draft Management Plan Section 4.5 – Access to Country

Any base camps provided for Aboriginal people should be of a temporary nature and located outside the wilderness zone. Base camp sites should be situated to minimise impact on park values and visitors.

Use of animal, plant and other materials should be low impact and for traditional cultural purposes of a non-commercial nature.

Draft Management Plan Section 6 – Management for presentation
Presentation delegated to a ‘plan within a plan’ process

Presentation and other key management factors of the Tasmanian Wilderness WHA should not be regulated by this plan to another planning process.

Only very limited, low environmental impact visitor facilities should be indicated in the management plan under the National Parks and Reserves Management Act 2002.

A Tourism Master Plan is a plan within a plan. The Colong Foundation opposes secondary planning processes that exclude key management decisions from the draft plan, particularly when these decisions are deferred to a less transparent and non-statutory process.

The tourism master plan refers critical development control matters to this secondary document, so that these are not governed by the statutory plan. Further, it is presented in the presentation section while the master plan proposes to regulate a much broader policy area.

The master plan will determine the priorities for:

- Investment in facilities and visitor experiences;
- Levels of sustainable use;
- Commercial opportunities;
- Parks and Wildlife support for tourism;
- Access;
- Staff training; and
- Even strategic partnerships, information, interpretation and education.

These so-called presentation issues will prioritise tax-payer funding for tourism facilities development at the expense of nature conservation. Further, the industry will tell everyone how and what to think about national parks.

The potential for commercial interests to funnel tourists into its facilities through its master plan controlled presentation processes is a formula for potentially corrupt practice that would disadvantage nature, the self-reliant park visitor and those interested in wilderness protection.
Draft Management Plan Section 6.3.3 – expansion of aircraft landing and associated facilities

The draft plan’s flawed and ineffective zoning scheme inverts the priority of reserve management from wilderness protection, to the installation of built commercial facilities and the introduction of aircraft noise through landing sites that will comprehensively destroy the property’s wilderness values and natural quiet. Already pilots from Par-Avion Wilderness Tours, and no doubt others, already needlessly fly low over or even beside the Eastern Arthurs and Federation Peak on the way to the Melaleuca airstrip. These operators want to expand commercial operations, even though it is a regular occurrence that up to five aircraft can be on the ground at Melaleuca at any one time.

The proposed 16 landing sites for helicopters and float planes will markedly reduce the natural quiet of the entire wilderness overflown to access these sites. Regardless of any fly neighbourly flight agreement in place, it is obvious that operators currently take the most scenic and lowest legal level flight path to any landing site. Such practice only makes the impact worse.

To address the introduction of pest species, including plant pathogens that will probably follow built infrastructure and aircraft access, the draft plan proposes a biosecurity overlay. Nothing, no management overlay, can bring back solitude, natural quiet and ecological integrity once lost through physical disturbance and damage to visual and acoustic amenity.

The proliferation of landing sites in the Tasmanian Wilderness is strongly opposed. This includes proposed landings on lakes on the heavily visited Central Plateau, Lake St Clair and Walls of Jerusalem as well as at Lake Petrarch and Fury Gorge.

Float planes will be followed by exclusive glamour camps in remote areas like Lake Judd and New River Lagoon.

*There should be no increase in aircraft landings above 1999 plan of management levels which ban aircraft use in the wilderness zone. Pumphouse Point should not become used by float planes. Aircraft access should not be granted to remote lakes and other areas of the TWWHA to the disadvantage of every other park user who will then suffer from intrusive noise from these slow moving aircraft.*

Draft Management Plan Section 7 – Management for Community Engagement

Numerous public opinion surveys over the decades reveal that the community supports wilderness. Opposition to wilderness comes from various particular stakeholders with vested interests, but these stakeholders are not representative of the community. Accommodating these interests will damage the outstanding values and integrity of the Tasmanian Wilderness.

The anti-wilderness stakeholders are politically aligned with commercial infrastructure development, off-road vehicle, horse riding, hunting and logging interests. These groups are opposed to nature conservation and can get broad media coverage, but this coverage is not a reflection of broad public support.
Arguments are presented along these lines: “We used to be able to drive into that old mine site and show the grandkids how we worked and lived. The road’s now closed off and we can’t go in there anymore.” The Tasmanian Parks and Wildlife Service has a duty to primary to protect wilderness and the natural environment that this should govern the extent to which it accommodates the demands for aircraft, horseriding, motor vehicle and ski-do access.

Access has never been a problem, but these complaints are generally associated with motorised vehicles even to the extent that it is assumed in speech without further explanation. Simply stepping out of your vehicle and walking permits ready access to the beckoning blue silhouettes of Tasmania’s mountains but that is not discussed. Bringing further motor vehicle and motor boat access into mountains and coasts simply drives away nature and brings modern technologically-based culture into core park areas, such as occurs currently in the Low Rocky Point National Park proposal area. There is not a problem of limited vehicle access in the Tasmanian Wilderness, rather there is too much access, primarily due to the past road construction activities of the Hydro and logging operations.

The contrast between allegedly “pure” nature and land that shows some impacts due to modern technology are exaggerated. The deceptive argument that there is no “pristine” wilderness is presented so as to permit commercial development of the wilderness zone. There may be no absolutely pristine wilderness but the Tasmanian Wilderness is the best we have left and needs to be protected.

Ecotourism will not lock in conservation outcomes for the Tasmanian Wilderness. There is no basis for the idea that economic exploitation through park-based tourism will assist in the conservation of the national park. Rather, it is taxpayer subsidised tourism that becomes an end in itself due to on-going economic expansion like any other business enterprise, and that continued growth will be to the detriment of conservation (e.g. the proposed expansions of boat tourism and the runway at Melaleuca).

The draft Plan of Management is inappropriately skewed toward accommodating stakeholder interests.

*When it is necessary to resolve conflicting user and development expectations, precedence must be given to the primary objective of protecting nature, the outstanding scenery and heritage features of the Tasmanian Wilderness.*

**Draft Management Plan Section 8.1 – Fire Management**

**Evidence-based ecological fire management**

The section on fire management appears confused in the assessment of fire history evidence and in the intentions to meet many objectives.

*For the majority of the Tasmanian Wilderness, planned fires should only be undertaken for evidence-based ecological purposes to ensure environmental values are not compromised.*
Prime bush fire management objectives should be consistent with the maintenance of wilderness values by ensuring the minimisation of all biophysical impacts and the maintenance and restoration of wilderness integrity (natural values, natural processes and existing native biodiversity).

Prescribed burns for the protection of life and property, particularly of adjoining land holders, should consider biophysical impacts through an environmental assessment prepared each year and placed on exhibition for public comment and review.

Draft Management Plan Section 8.2 – General management, wilderness

Section 8.2 attempts to present the proposed Remote Recreation Zone as a surrogate for the wilderness zone it partly replaces (while other parts will be developed). This is an incorrect representation of this zone.

Most of the Tasmanian Wilderness is untouched by modern technology and to assert in a draft plan that this integrity is not important or valuable, not worth keeping for its own sake, is contrary to clause 96 of the Operational Guidelines of the World Heritage Convention.

From 1982 to 2015 park management has protected and enhanced wilderness values of this World Heritage property. The removal of the wilderness protection zone is not just a semantic change, but a root and branch ‘political cleansing’ of the management plan to remove wilderness ideas, thought and action, in an attempt to utterly and completely destroy it.

The zoning table permits commercial tourism, logging, fishing, beekeeping, aircraft landing, accommodation and associated infrastructure in the proposed Remote Recreation Zone. This zone will be, by definition of its use, a visitor services zone, regardless of the plan’s semantics.

Thank you for the opportunity to comment on this plan.

Yours sincerely,

Keith Muir
Director
Colong Foundation for Wilderness Ltd