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Inquiry

TASMANIAN NATIONAL PARKS ASSOCIATION SUBMISSION TO THE WORLD HERITAGE MISSION TO THE TASMANIAN WILDERNESS WORLD HERITAGE AREA, MARCH 2008

Tasmanian National Parks Association
17 March 2008

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1. Introduction & Summary

This document constitutes the Tasmanian National Parks Association (TNPA) formal submission to the World Heritage Mission to the Tasmanian Wilderness World Heritage Area (TWWHA) in March 2008. The TNPA will also be meeting with the World Heritage Mission as part of the Environmental NGO meetings on the 18th March 2008.

The purpose in making this written submission is to both support the submissions of the other environmental organisations, in particular that of the Tasmanian Wilderness Society, and to make comment on a small number of additional matters that we also believe are of critical importance in the ongoing conservation of the TWWHA and its value of outstanding universal significance.

The submission is in three parts –

1. Introduction & Summary - which introduces the TNPA and outlines the scope of the submission and summarises the TNPA's key concerns and recommendations
2. Issues section -- which present a summary discussion of values at risk and recommendations for risk management and mitigation by issue
3. References and Attachments.

This submission has been compiled from input from various TNPA members. These TNPA members have an in depth knowledge of the TWWHA based on long term connection with the TWWHA as scientists, artists, activists and recreationalists. This expertise also includes previous working experience in the Parks & Wildlife Service, with Forestry Tasmania (in the former Forest Practices Unit) and membership on the Tasmanian Wilderness World Heritage Area Consultative Committee and National Parks & Wildlife Advisory Council.

The submission is by necessity brief. As a small NGO we have limited resources to compile a comprehensive and detailed submission, and in relation to this matter we have had significant time constraints. To help address this issue we have attached a number of documents, primarily submissions or articles by the TNPA on various of the issues raised. The TNPA is also happy to provide additional details regarding specific issues (and boundaries) on request.

If the World Heritage Mission would like further information on any aspect of the TNPA submission, please contact the TNPA Project Coordinator, Janet Henderson, on 0427 854 684 or at admin@tnpa.asn.au

The Tasmanian National Parks Association

Launched in September 2001, the TNPA is a non-profit, non-government organization 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 membership reflects a range of interests and expertise in relation to reserved land, and has within its membership considerable expertise in reserved land management and in natural and cultural values management. Further information about the TNPA can be found at www.tnpa.asn.au.

A summary of the guiding philosophy and objectives of the TNPA is contained in the Tasmanian *National Parks Association Manifesto* (refer Attachment 1).

Scope of Submission

The scope of the TNPA submission has regard for the World Heritage Committee's recommended focus for the World Heritage Centre/IUCN/ICOMOS mission, which is to assess the state of conservation of the Tasmanian Wilderness World Heritage Area property, focusing on:

a) appropriate management of areas of heritage value which are currently outside the property,

b) an assessment of the degree of risk related to regeneration fires in areas adjacent to the World Heritage property as well as of the effectiveness of the fire management system in place,

c) impacts of proposed forestry operations (including the construction of new roads) on the outstanding universal value of the property (World Heritage Committee Decision: 31 COM 7B.43).

Although this World Heritage Mission has come about largely in response to the concerns of some Tasmanian NGOs in relation to Forestry operations on the boundaries of the TWWHA and other forestry practices (eg fire management) which have the potential to impact the TWWHA values and other related values outside by adjacent to the TWWHA, the TNPA is of the opinion that there are other important current issues in relation to the management of the TWWHA. We see the present World Heritage Mission as a rare opportunity to again present and remind relevant bodies of some ongoing issues and to raise other new concerns. The TNPA is encouraged to take this approach from the invitation by Mr Francesco Bandarin (correspondence 12 February 2008) to participate in the Mission's visit to Tasmania in response to TNPA's letter outlining concern over new proposed mining exploration in the Cox Bight Area (a small enclave in the southern part of the TWWHA).

The TNPA also see the present Mission as a timely opportunity to raise a range of concerns given that the values and boundaries of the TWWHA have not been comprehensively and independently reviewed since the Helsham Inquiry (1987/8).

Matters that in the TNPA's view mandate for a comprehensive review and holistic consideration of TWWHA boundaries and the management of the TWWHA include[1] –

- there have been several studies identifying World Heritage values beyond the current TWWHA boundary, and calls for their addition to the WHA;

- there has been recent research detailing World Heritage values within the TWWHA (and in some cases implicitly outside);

- the inadequacy of the existing TWWHA boundary (acknowledged when it was declared);

- the major deficiency of the Regional Forests Assessment in not including consideration of geoheritage and cultural heritage values in the reservation assessment;

- the unresolved matter of the former Lake Pedder and its rehabilitation;

- recent changes to the Parks & Wildlife Service, the management agency for the TWWHA, which the TNPA argues has reduced the agency's ability to effectively manage the TWWHA;

- recent decisions by the present State government that promote tourism development in reserved land areas, including in and on the boundaries of the TWWHA, at the expense of the natural and cultural values and the presentation of these values.

The scope of the TNPA submission therefore includes a number of issues related to, or which reflect, the above.

[1] A post-Helsham Inquiry summary of key events, studies, etc is presented in Attachment 2.

In making our submission the TNPA also have had regard to –

- the *World Heritage Convention* (1972) and *Operational Guidelines* (2005)
- the established and agreed primary objective for the management of the TWWHA which is – "*To identify, protect, conserve, present and, where appropriate, rehabilitate the world heritage and other natural and cultural values of the WHA, and to transmit that heritage to future generations in as good or better condition than at present.*" (TWWHAMP 1999); and
- the importance of the integrating value of 'wilderness' to the TWWHA, reflected in the TWWHAMP 1999 key management objective "*to maintain and enhance wilderness quality*".

Summary of Tasmanian National Parks Association Submission

Having regard to the above, the TNPA put the following propositions to the March 2008 World Heritage Mission to the Tasmanian Wilderness World Heritage Area –

With regard to areas of heritage value which are currently outside the property (and adjacent to the TWWHA) and their appropriate management:

- **Recherche Bay** has national level and potential world heritage values, including associative cultural landscape values, related to the French expeditions of 1792 and 1793 and in part to their interactions with the Aboriginal Tasmanians, which are at risk from new, inappropriate uses and forestry practices. Recherche Bay should therefore be included in the TWWHA, in particular the area on the National Heritage List, the southern peninsula and the State Forest areas which form part of the setting, viewscape and associative cultural landscape.
- **Cox Bight and the South West Conservation Area** have essentially the same World Heritage and other natural and cultural values as the adjoining TWWHA, and these values are at risk from mineral exploration and potentially mining, the mineral potential being the key reason that these areas were not originally included in the TWWHA. These two Conservation Areas should be therefore included in the TWWHA.
- The **Riveaux Karst** area has significant geoheritage and Aboriginal heritage values. The Aboriginal heritage values complement the suite of Aboriginal values of outstanding universal value in the TWWHA. These values have been impacted and are at risk from forestry operations. The area should therefore be included in TWWHA.
- The **Upper-Mid Florentine Valley** has significant geoheritage (karst) and Aboriginal heritage values (significant Pleistocene occupation sites). The Aboriginal heritage values complement the suite of Aboriginal values of outstanding universal value in the TWWHA. The karst (of the middle Florentine) provides rare information on Tasmania's glacial history and is a significant karst system. These values have been impacted and are at further risk from forestry operations. The area, specifically the upper Florentine down to and including the Lawrence Creek system and across to join the Mt Field National Park should therefore be included in TWWHA.
- The **Navarre Plains** is an area of glaciation at the heart of the Franklin and Derwent systems containing significant evidence for earlier glaciations in Tasmania. It also has significant Aboriginal values in relation to historical and probable earlier Aboriginal occupation. The Navarre Plains north of the Lyell Highway forms a small ambiguous State Forest area surrounded by the TWWHA. Forestry operations impact on the ability to present the current TWWHA and its values. This area should therefore be included in TWWHA as its inclusion would enhance the presentation of the TWWHA, include complementary values and eliminate the risk of impacts from forestry operations and create a more logical boundary. A more logical boundary and better presentation of the TWWHA in this area could be achieved by making the Lyell Highway the southern boundary of the TWWHA between the current western boundary near the Navarre River, east to the Clarence River.

- The escarpment of the **Great Western Tiers** contains abundant significant evidence of Aboriginal occupation from the Pleistocene to present, in and adjacent to, sandstone shelters in the Permo-Triassic bedrock. These sites are very poorly represented in the TWWHA, but are complementary to the recognised TWWHA Aboriginal heritage values. They are also at risk from forestry operations. The area, specifically an area contiguous with the TWWHA boundary from Western Bluff to Projection Bluff which includes the band of Permo-Triassic bedrock, should therefore be included in TWWHA.
- The **Mill Creek-Kansas Creek area** near Mole Creek, which contains the Croesus-Lynds-Tailender caves system has attributes of international significance. Management issues include multiple land tenure and the need to safeguard the caves system catchments. In addition, internal protocols within Forestry Tasmania are inadequate to protect this area. Because of the karst values of the area and the associated management problems, this area should be included in TWWHA.

With regard to impacts of forestry operations:

- Wood production forestry creates a range of impacts on the natural and cultural environment which cannot be eliminated, even thought they may be mitigated.
- Key impacts in relation to TWWHA values and values in adjacent areas include –

  - wild fire from escape burns (from fuel reduction burning and post-logging coupe preparation)

  - roading which impacts on wilderness quality and presents increased risks of weed invasion and fire

  - landslips in sensitive areas through altered groundwater flow regimes as a result of vegetation loss from logging and

  - impacts on karst systems through logging in karst areas

  - impacts on Aboriginal and historic heritage due to poor pre-logging site visibility

  - impacts on cultural landscape values primarily through clearfelling and escaped burns

  - impacts on flora and fauna viability through extensive clearfelling.
- In spite of the above, no buffer zone management arrangements have been established in areas where State forest and/or forestry operations abut the TWWHA (this is in spite of recommendations for this by the TWWHA Consultative Committee in at least the mid-late 1990s).
- Even though managed through the Forest Practices system, breaches have occurred in areas with significant values (eg, Florentine karst).
- Values are not always adequately assessed through the Forest Practices system (eg, NE Peninsula of Recherche Bay).
- The ability and interest of the forestry industry to fully conserve significant natural and cultural heritage must be questioned while exclusions for forestry operations continue to be included in key legislation such as the *EPBC Act* 1999 (C'wlth) and the *Historic Cultural Heritage Act* 1995 (State), in the latter case in spite of recommendations of an independent review (Mackay 1995) to remove the exclusion.
- In determining additional reserve areas in the Regional Forests Assessment in the Tasmanian region geoheritage and cultural heritage were excluded from consideration (on the basis of inadequate values information or not being a criteria (Janis criteria) for the Comprehensive, Adequate and Representative Reserve System being established), yet the Regional Forests Assessment process is used to limit consideration of reservation for geoheritage and cultural heritage values, as well as to create exemptions in relation to natural and cultural values (eg, EPBC Act 1999).

- Given the above, consideration needs to be given to –
  1. creating agreements between the PWS and the timber industry to ensure that adequate provisions are put in place to protect TWWHA values through the management of buffer zones;
  2. creating significant new areas of reserve for geoheritage and cultural heritage values; and
  3. incorporating significant values adjacent to the TWWHA and subject to forestry operations into the TWWHA to ensure their protection which cannot be guaranteed under the present management arrangements.

With regard to fire management and regeneration fires within the Tasmanian Wilderness World Heritage Area and in areas adjacent:

- This is a complex area, including for the TWWHA, that needs to take account of a range of issues, including –

  - changes in the frequency, nature and pattern of burns of all types (including lightening strikes) with the changing conditions being experienced (due possibly to global warming effects),

  - probable future conditions,

  - allowing for areas of natural evolution with respect to fire (ie, maintaining areas without fire management intervention),

  - the range of conservation needs, including natural and cultural values and cultural landscape values conservation,

  - risks to the range of values, including cultural landscape values, and

  - the introduction of Aboriginal burning practices and the knowledge on which this is based.

- There are risks to the TWWHA and consequently the TWWHA values from escaped burns.
- Fire management in and adjacent to the TWWHA therefore needs to be comprehensively assessed, based on good values, fire and fire management data, and clear conservation objectives. As this is not currently the case, this area needs to be urgently reviewed.
- Where there are significant risks to TWWHA values or other significant values outside the TWWHA through fire management practices, and where these cannot be satisfactorily mitigated, then consideration should be made to including these areas in the TWWHA.

With regard to the rehabilitation of significant values of the TWWHA:

- The TNPA also urges the World Heritage Mission in World Heritage review process to consider **the restoration of Lake Pedder** as per the resolution of IUCN at the Buenos Aires Meeting in January 1994. Restoring Lake Pedder would achieve recovery of a precious place, of an Australian environmental icon, and of natural system integrity consistent with WHA Guidelines, particularly with regard to safeguarding the complete set of glacigenic landforms in the area.

With regard to other aspects of management of the Tasmanian Wilderness World Heritage Area the following are seen as critical issues for the identification, protection, conservation, rehabilitation and presentation of the TWWHA and its natural and cultural values. If these issues are not addressed, the TNPA contends that the TWWHA values are, and will remain, at risk:

- **Funding** - the current funding to the Tasmanian Parks & Wildlife Service significantly constrains the ability of the Service in many TWWHA management areas, including
  - to undertake ongoing identification of natural and cultural values,
  - to fund adequately fund historic heritage conservation works,
  - to adequately fund an Aboriginal partnership management approach,
  - to adequately monitor impacts (eg, walking track user impacts, commercial uses), and
  - maintain visitor infrastructure (including tracks).
- **Tourism Development** – there has been unprecedented tourism development in the TWWHA and adjacent areas in recent years which have ignored TWWHAMP plan provisions and in the TNPA's view are not consistent with (and in fact go counter to) the primary objective for managing the TWWHA, including in relation to presenting the TWWHA 'in ways that are compatible with the conservation of its natural and cultural values, and that enrich visitor experience'. Examples are Cockle Creek East (Recherche Bay), and Pumphouse Point and Cynthia Bay (Lake St Clair).
- **Changes to PWS management structure** – in the last c.8years the PWS has experienced significant changes to its structure and staff expertise base, including the loss of the dedicated position of National Parks & Wildlife Director (provided for under the *National Parks and Reserves Management Act 2002*) which has been allocated to the Department Secretary (until recently the Secretary for Tourism, Environment & the Arts, with arguably conflicting responsibilities and interests), and removal of most scientific staff to another government department, with only vestigial links retained to the PWS. In the TNPA's view, this has significantly compromised the ability of the PWS to manage the TWWHA effectively and in accordance with the established objectives, hence needs to be urgently addressed.
- **Federal/State Ministerial Responsibilities** – the TNPA is extremely concerned about recent changes to Ministerial Council arrangements for the TWWHA which in effect give the State government more decision making responsibility than previously. The previous balance of responsibilities was extremely important in ensuring that decisions in relation to the TWWHA were balanced and informed. The change in balance in the TNPA's view gives too much authority to the State government, which appears to find it difficult to maintain conservation as a priority.
- **Community Engagement** – since the creation of the TWWHA, the PWS as land manager has had a number of community issues to address. In spite of recommendations from its advisory bodies over at least the last 10 years, the PWS still continues to have a minimal and largely reactive and ad hoc community engagement program (except in the area of volunteer work). The PWS also appears to have reduced its commitment to an Aboriginal partnership approach in recent years. The PWS has also knowingly failed on at least one occasion to meet its ethical obligations for community and other stakeholder consultation in relation to conservation management planning in the TWWHA.

The above focuses on deficiencies in relation to the management of the TWWHA and adjacent areas with significant values. There are some TWWHA management areas however where, in the TNPA's opinion, the PWS has performed well and for which the PWS staff deserve credit.

These include –

- The TWWHA management plan and planning and plan review processes to date.
- The management audit of the TWWHA that was carried out in c.2004 reported in the *State of the Tasmanian Wilderness World Heritage Area – an evaluation of management effectiveness* (Parks and Wildlife Service Tasmania 2004).
- The adoption, at least as policy, of an Aboriginal heritage partnership management approach.
- The Community Huts Partnership Programme.

References

Bandarin, F., Director, UNESCO World Heritage Centre, 12 Feb 2008, Letter to the Tasmanian National Parks Association.

Parks & Wildlife Service 1999 *Tasmanian Wilderness World Heritage Area Management Plan*, Department of Primary Industries, Water & Environment, Tasmania.

Parks and Wildlife Service Tasmania 2004 *State of the Tasmanian Wilderness World Heritage Area – an evaluation of management effectiveness.*

TNPA (no date) *Tasmanian National Parks Association Manifesto.*

The Tasmanian Wilderness World Heritage Area World Heritage Committee Decision WHC-06/30.COM/7B State Party [i.e. Australia] Report. Available at http://www.environment.gov.au/heritage/publications/pubs/tas-wilderness.pdf

UNESCO 1972 *Convention Concerning the Protection of the World Cultural and Natural Heritage*. Adopted by the General Conference at its seventeenth session, Paris, 16 November 1972.

UNESCO 2005 *Operational Guidelines for the Implementation of the World Heritage Convention*. Intergovernmental Committee for the Protection of the World Cultural and Natural Heritage, World Heritage Centre, UNESCO.

2. Discussion of TWWHA Management Related Issues

The following discussion provides additional detail in relation to the various issues raised in Section 1, above.

Different issues are discussed at different level. This reflects in part those issues with the TNPA is most familiar. It also reflects those issues with which the TNPA is most concerned and which are less likely to be covered by other submissions.

In relation to the discussion of areas which in the TNPA's view should be included in the TWWHA, no detailed boundaries have been presented. Boundary delineation is a complex issue and the TNPA is reluctant to propose precise boundaries without further research and discussion. We are however happy to provide indicative mapped boundaries on request.

The management of the TWWHA, and values within the TWWHA, is presented first as the TNPA sees this as a critical matter which underpins the management of the TWWHA. If there are issues with the management approach then this potentially compromises the TWWHA and its values. It is important therefore that issues related to the management of the TWWHA are identified, and the State parties can be encouraged to address these.

2.1 Management of the TWWHA

2.1.1 Tourism Development in the TWWHA

This issue is of growing concern to the TNPA as an increasing number of increasingly large scale developments in Tasmanian national parks are proposed and supported by the Tasmanian government without apparent regard for the conservation objectives of reserved land in Tasmania, or of the TWWHA in relation to cases where the development is within the TWWHA.

The following quotations provide an insight into this issue in a Tasmanian context:

> *"National parks are for conserving the priceless remnants of the natural world in perpetuity. They are about protecting the inanimate physical structure of the Earth and the associated life forms that together constitute the living world. National parks are where we can witness raw land unimpaired by human manipulation, and as such, all commercial development – which can only degrade the integrity of wild land – belongs outside our parks' boundaries" (TNPA Manifesto 2003:1)*
>
> *"Heritage assets still well conserved but need to watch commercialization in and around major parks" (Destination scorecard for Tasmania, National Geographic Traveller, www.nationalgeographic.com/traveler/scorecard)*
>
> *Visitor surveys and public input have consistently indicated that visitors come to national parks in order to experience and enjoy the natural world and do not wish to see major developments, preferring instead a low level of visitor facilities of a small and unobtrusive nature. (Judy Jackson, Minister for Parks, Wildlife and Heritage, Preface to Site Plan for Cynthia Bay, Lake St Clair, 1991).*

- Several large scale tourist developments have either been approved or proposed within the TWWHA. These are:

- Redevelopment and expansion of tourist accommodation at Cynthia Bay, within the Cradle Mountain- Lake St Clair National Park and TWWHA (partly approved and future expansion being proposed).

- Development of a luxury tourist accommodation resort at Pumphouse Point, within the Cradle Mountain- Lake St Clair National Park and TWWHA (proposed).

- Tourist accommodation resort at Cockle Creek East, within the Southwest National Park and while outside the present boundaries of the TWWHA lies within the area covered by the Management Plan for the property (approved; a road has been pushed into the development site but no further works have yet commenced.).

- The TNPA is concerned that developments such as those listed above are been allowed to proceed in an *ad hoc* manner that are either contrary to the intent of the 1999 WHA Management Plan or that incremental changes are being made to the Management Plan in order to allow the developments to proceed. In both cases this has lead to a considerable weakening of the management prescriptions.

- The above developments also pose a threat to the WHA values within and around the areas concerned. For example, the development site at Pumphouse Point is located close to precious glacially formed beached, the largest in Tasmania since Lake Pedder was flooded, together with sand dunes, moorland and wetland habitats of conservation significance. The site also contains habitat for two of Tasmania's threatened species (the Wedge Tailed eagle and the Swift parrot). Incremental destruction of such sites renders meaningless the intent of conservation reserves.

- If we do not stop developments intruding into these areas, then where do we? If protection does not start at the boundaries of our conservation reserves, then where does it?

Contrary to 1999 WHA Management Plan (TWWHAMP)

- While the TWWHAMP prescribes the provision of "*some overnight use by developing a range of facilities*" it is also stated that VSZs should cater "*principally for the needs, interests and abilities of day visitors*." The TWWHAMP also states that the VSZs are to be seen as complementing visitor services centres located nearby but outside the WHA.

- In the section of the TWWHAMP that relates specifically to Accommodation the stated management objective is "*To encourage the provision of accommodation in nearby townships and areas adjacent to the WHA*" (p132). The rationale provided for this approach is based on research that "*much of the experience sought by visitors ... is based on the area's wilderness quality. To maintain this it is important that accommodation has minimal impact on wilderness quality and the WHA and the other natural and cultural values of the WHA.*"

- Further articulation of the policy to site major facilities outside the WHA is provided by the Management Prescriptions which states that "*Developments outside the WHA are preferred to those located within the area*" (p. 177).

- In relation to Concessions, it is also stated that "*If facilities or services exist or can be developed outside the WHA that meet visitor needs, such facilities and services will not be provided as concessions within the WHA*" (p 178). It is also stated that "*Concession activities will only be allowed if consistent with the protection of World Heritage and other natural and cultural values of the WHA*".

- Finally, in explaining the need to balance the protection and presentation aspects of managing the WHA with the demand for visitor experiences, the Management Plan further states that the WHA is a major plank of Tasmania's tourism industry and in recognition of this fact the Parks and Wildlife Service has adopted a number of broad

- approaches to management. These include: "*locating major accommodation and facilities outside the WHA or near its periphery.*" (p175). In adopting this approach, a number of locations have been considered as WHA gateway areas. These are well situated for general tourism development associated with but aside the WHA.
- Based on the above management objectives and prescriptions the TNPA argues that the overall management strategy is for VSZs to cater principally for day visitors while accommodation facilities are to be located outside the WHA at nearby Visitor Service Centres.

Changes to Management Prescriptions

- The TNPA believes that successive modifications of Site Plans and the TWWHAMP, as outlined below, have rendered meaningless the main purpose of these documents to ensure that development proceeds in a coordinated and integrated manner rather than on an *ad hoc* or facility-by-facility basis. Such modifications undermine the stated intent of the TWWHAMP piece-by-piece resulting in a piece-meal reduction of protection that is no different to a "death by a 1000 cuts.

Cockle Creek East

For the development to proceed the TWWHAMP had to be altered. This alteration, undertaken in 2002, zoned the previously unzoned development site as part of the Cockle Creek East Visitor Services Site. One of the three sentences that were changed was as follows: "*In the Southwest National Park development of infrastructure, including huts, is not allowed in view of the natural character of the area*" was replaced by "*In the Southwest National Park development of infrastructure, including huts, is not allowed, except within Cockle Creek East Visitor Services Site*".

Cynthia Bay

The initial planning objective to keep accommodation facilities at Cynthia Bay "*approximately at present levels and standards*" (as stated in the 1991 Site Plan) for around 60 persons was first weakened in the revised 1993 Site Plan when the limit on accommodation was raised to 72 persons, while in the 2003 Site Plan there is no stated limit. In the proposal for the site approved in 2004 it is stated that the redeveloped facilities will accommodate 324 persons while the total permitted number of persons on site is 360. Furthermore, the initial concept of providing low-cost basic accommodation has also been forgotten as the present proposal mainly consists of luxury-style cabins.

Pumphouse Point

Although the overall management prescriptions outlined in the TWWHAMP restricts overnight accommodation facilities to outside the WHA, it does nevertheless refer to placement of an overnight tourist accommodation at Pumphouse Point. However, this needs to be seen for what it is, a historical anomaly. The original decision to allow the accommodation facility at Pumphouse Point was announced in the mid-1990s when the site was still under the management of the HEC and outside the National Park. As the present TWWHAMP was not written until after this decision was announced the TWWHAMP was obliged to include this proposal. However, now that the management of the site has changed and the site is now within the boundaries of the National Park, the original decision to allow such a facility at Pumphouse Point needs to be reviewed and reversed.

Threat to Wilderness Values

- It is somewhat ironic that all development proposals seek to draw on the wilderness qualities of the WHA (see discussion Section 2.1.2 below). For example, the present proposal for Pumphouse Points states that "*the development will seek to draw inspiration from the qualities and values of the WHA while ensuring that these essence qualities are maintained*". However, such statements are clearly hypocritical, and clearly

contrary to the objectives of the TWWHAMP, as such developments will severely degrade these very wilderness values. *How can a development focus on wilderness by destroying its very essence?* It is quite clear that such developments cannot protect the wilderness qualities of the WHA unless they are sited outside this area.

Recommendations

1. If one is to be faithful to the management prescriptions of the TWWHAMP then each of the proposed developments within the WHA must be rejected and sited outside the WHA.
2. The TNPA recommends that TWWHAMP be revised to exclude the development of new overnight accommodation facilities in the WHA, and that Visitor Services Zones cater for day-use facilities as prescribed in the TWWHAMP. This view is supported by the State of the TWWHA Summary Report which lists the development of new facilities and other infrastructure as one of the main threats and pressures on the natural and cultural heritage of the TWWHA (p12).
3. The TNPA also recommends that the areas encompassed within the present Visitor Services Zones be significantly decreased to become more aligned with the areas within these zones where service facilities presently exist. The Lake St Clair VSZ demonstrates the need for this action. This zone presently encompassing the area of around 8 km^2. This is an enormous area - several times larger than the town of Derwent Bridge! - though existing visitor service facilities are basically confined to Cynthia Bay which itself only represents a small fraction of the VSZ. The 1999 TWWHAMP states that VSZs are to provide "*principally for the needs, interests and abilities of day visitors*" (p60). Given this prescription, together with the management objective "*to maintain, as far as possible, a natural setting ... and to minimize the environmental, aesthetic and social impacts of facilities and visitor use*", (p60) it remains inconceivable that the entire extent of the existing VSZs are needed to cater for the needs of day visitors. To do so would entail replacing the existing naturalness of these areas by small towns.
4. The TNPA supports the principals of the integrated vision articulated by the Tasmanian Parks and Wildlife Service for the Cradle valley region at the northern end of the Cradle Mountain-Lake St Clair National Park in which all accommodation facilities will be located outside the park. The TNPA therefore recommends that a similar approach be developed at the southern end of the same park in relation to the Lake St Clair/Derwent Bridge region.

2.1.2 Community Engagement & Management of the TWWHA

- The PWS have a history of a poor approach to community consultation generally. The PWS approach to consultation is not strategic, and tends to be reactive and focused on meeting statutory requirement (eg, public comment for management plans).
- Since the creation of the TWWHA, the PWS as land manager has had a number of community issues to address. In spite of recommendations from its advisory bodies over at least the last 10 years, the PWS still continues to have a minimal and largely reactive and hoc community engagement program.
- Other than for the volunteer programme, Wildcare, PWS community consultation and engagement generally has diminished over the last c.9 years, and there appears to be no indication of a reversal in this trend.

- It should be noted that there have been some good community (mainly cultural heritage related) initiatives however by the PWS, in particular the Community Huts Partnership Programme, and significant improvement in Aboriginal involvement in WHA Aboriginal values management (although this has diminished recently).
- There are specific cases that the TNPA is aware of where the PWS are failing to meet their obligations, including with respect to the Australia ICOMOS *Burra Charter*, for genuine and meaningful community participation. these include in relation to the TWWHA –

  - Sarah Island Conservation Management Plan (McConnell et al 2003) – where the PWS refused to put the draft CMP out for public consultation although there had been an understanding that this would occur and stakeholders had been informed and some were relying on this as their one opportunity to make comment. The reason given was that the document was too large (vol 1 which was the CMP was in the order of 80 pages).

  - Recherche Bay (refer Section 2.2.1) where the government refused to engage or inform the broader heritage community and generally excluded their participation in management and research.
- In the TNPA's view the PWS fails in general to meet WHA management principles for community involvement (and those embodied in the Richmond Communique) and the TWWHAMP 1999 provisions.

Recommendations

1. If one is to be faithful to the management prescriptions of the TWWHAMP and generally accepted principles for community participation, then the PWS must develop and implement, in consultation with the community and other stakeholders, a strategic approach to community and stakeholder engagement for the TWWHA (preferably for all reserved land in Tasmania) that provides for genuine and meaningful consultation and participation.

2.1.3 Administrative Management of the TWWHA

Funding

- The level of funding is a major issue for PWS management and severely limits the ability to manage the WHA to meet obligations (refer Attachment 7).
- The State government's level of commitment is questionable – in 2007 $15 million (later $24 million) was required to fund an urgent Rabbit & Rat Eradication Plan on Macquarie Is (WHA and part of Tasmania) but the government said it couldn't afford it (having just spent $15 million on four football games in Tas) resulting in a c.6 month stand off between the Fed and State government (now resolved).
- The current funding to the Tasmanian Parks & Wildlife Service significantly constrains the ability of the Service in many TWWHA management areas, including –

  - to undertake ongoing identification of natural and cultural values,

  - to fund adequately fund historic heritage conservation works,

  - to adequately fund an Aboriginal partnership management approach,

  - to adequately monitor impacts (eg, walking track user impacts, commercial uses) (a recent example in the TWWHA is that of an illegal commercial helicopter landing site- refer Attachment 3), and

  - maintain visitor infrastructure (including tracks).

Recommendations

1. The Federal and State government need to work cooperatively to ensure that funding to the TWWHA is adequate to meet the State Party's obligation for the management of the TWWHA.

Management & Protection

- Overall the PWS management has been reactive and slow. The TNPA argues that it is not possible to meet the primary objective, or other key objectives for management with this style of management.
- Political interference is a key issue, particularly in relation to 1) forestry & tourism (Recherche Bay, Pumphouse Point) 2) structural revision in the last c.9 years, and 3) the balance of responsibility between the Federal and State governments.
- The TNPA is extremely concerned about recent changes to Ministerial Council arrangements for the TWWHA which in effect give the State government more decision making responsibility than previously. The previous balance of responsibilities was extremely important in ensuring that decisions in relation to the TWWHA were balanced and informed. The change in balance in the TNPA's view gives too much authority to the State government, which appears to find it difficult to maintain conservation as a priority (eg, most recently at Recherche Bay, at Ralphs Bay, and in relation to the Gunns Tamar Pulp Mill). This is critical issue given the contested views/values in the TWWHA.
- In the last c.8years the PWS has experienced significant changes to its structure and staff expertise base. this includes 1) the loss of the dedicated position of National Parks & Wildlife Director (provided for under the *National Parks and Reserves Management Act 2002*) which has been allocated to the Department Secretary (until recently the Secretary for Tourism, Environment & the Arts, with arguably conflicting responsibilities and interests), and 2) the removal of most scientific staff to another government department, with only vestigial links retained to the PWS. In the TNPA's view, this has significantly compromised the ability of the PWS to manage the TWWHA effectively and in accordance with the established objectives, hence needs to be urgently addressed (refer Attachment 4).
- A number of recommendations for improving the strategic and values management of the TWWHA have been made since 1989 (refer Attachment 2), BUT to date there is little evidence that these recommendations are being implemented. In the TNPA's view this is significantly compromising the ability of the PWS, and the State party to meet their WHA management obligations.

Recommendations

1. The Federal and State government need to work cooperatively to ensure that the management structures will demonstrably meet the State Part's obligation for the management of the TWWHA.
2. The dedicated position of Director of National Parks and Wildlife must be re-instate to allow for independence of the PWS and for greater government transparency.
3. The linkages between the scientific support and the PWS must be re-established. This should include moving the scientific support back into the same government department as the PWS. This would be timely given the recent departmental changes (January 2008).

2.1.4 Lake Pedder [2]

Site values

- The original Lake Pedder was a glacial lake of unusual origin & beauty.
- It appears to have no parallel in the world geomorphological literature.
- It was the crown jewel of the Tasmanian wilderness.
- It was inundated by the 260 km^2 Huon-Serpentine hydro-electric reservoir in 1973. This was a defining issue in emergence of Australian environmentalism, stimulating formation of such organisations as the Wilderness Society and Green Party.

History and issues

- The campaign against flooding Lake Pedder was based on aesthetics and recreational values, but scientific importance of Lake Pedder was never properly investigated and the 1974 Australian Government Lake Pedder Committee of Enquiry reported that "the investigation was totally inadequate and failed to identify any of the significant features of the Park or lake itself ". A 1995 Federal Parliamentary Inquiry (by the House of Representatives Standing Committee on Environment, Recreation & the Arts) concluded that "It is unfortunate that the beautiful, geologically unique lake was ever flooded……In future a much greater weight must be given to the preservation of….geological diversity." There has been ongoing pressure to drain the reservoir and restore the original lake.
- Jim Thorsell, Senior Advisor, Natural Heritage IUCN, recorded in 1995 that "As it sits now the lake [the Huon-Serpentine storage] is an insult upon the land. We initially thought it should be excised from the existing World Heritage site but our 1989 evaluation foreshadowed the eventual prospect of restoration and on that remote (at that time) prospect we left it in. On earth in general and in Tasmania in particular it is time for healing. I would hope this process can begin with the successful restoration of Lake Pedder".
- The IUCN, at its 19th Session, Buenos Aires, Jan 1994, resolved that "…the General Assembly of IUCN CALLS UPON the Tasmanian State Government and the Government of Australia to investigate the feasibility of (a) the restoration of the original Lake Pedder….(b) ..a detailed analysis..of benefits… (c)…the potential for Australia to capitalize…and use the expertise....(d)..a comprehensive energy efficiency and power conservation programme… and

  REQUESTS the Director General to make available to the Tasmanian Government and Government of Australia relevant technical expertise
- Subsequently, the Final Report of the Australian Government House of Representatives Standing Committee on Environment, Recreation and the Arts, (Inquiry into the Proposal to Drain and Restore Lake Pedder), June 1995 concluded that " Technically it is feasible to drain the present impoundment and restore the original lake "

Why restore the natural Lake Pedder?

- Although biodiversity tends to dominate contemporary nature conservation, protection of wider natural diversity also involves protection of additional values, such as geodiversity. Physical features such as landforms are significant in own right (not just as substrate for biodiversity). Physical features rather than just biodiversity stimulated many early conservation initiatives (Yellowstone, Jenolan). As with any natural heritage, three broad groups of values are always involved, namely Existence & Intrinsic values, Natural System Support values and Instrumental values to humans. It is convenient to assess these at four levels. The System controls level describes the environmental context in which feature has

[2] Refer also Attachment 5.

formed (partly similar to bioregion approach); Landforms & landform assemblages – types, prominence, whether common or rare, robust or fragile; 3. Landform contents - may impart or compound value (eg. fossils; biota; archaeological sites); and 4. Human use - past, present & future.

- At the system controls level, Lake Pedder is important because it can contribute in a major way to understanding Earth history. The palaeoclimatic histories of northern & southern hemispheres differ & records from the two hemispheres complement one another. Terrestrial evidence of glaciation rarer in southern hemisphere because temperate latitudes are predominantly oceanic. In addition glacial landforms are not formed in similar rock types to Tasmania elsewhere in southern temperate latitudes. Finally, the relative tectonic stability in Tasmania contrasts with other glaciated areas in southern temperate latitudes (New Zealand & Andes). Hence in Tasmania past glacier extents more representative of true climate history and very ancient glacial features have survived.
- At the landforms and landform assemblage level, Lake Pedder is simultaneously a landform in its own right, part of a broader genetically-related set of landforms (bounding Frankland Range, glacial cirques, moraines, outwash aprons alluvial fans). There appears to be no apparent equivalent to Lake Pedder (in terms of genesis / size / character + combination) recorded in the geomorphological literature. The Frankland Range is oriented NS but swings E-W further south. Most glaciers formed on the western side of range (in lee of natural snow-fence & shaded from afternoon sun) and discharged a barrage of sediment across the Serpentine Valley. No significant glaciers formed on the exposed northern side of range where its orientation changed hence much less sediment was discharged and Pedder formed in the resulting hollow.
- Its component landforms included the Serpentine River channel and the beaches, which were naturally exposed in summer and covered each winter due to outflow regulation by Serpentine River channel. The main beach was 600 m wide, formed of pinkish-white glacigenic quartz sand, and was the most extensively developed freshwater beach system in Australia. Protruding into the lake were spectacular megaripples 400 m long that differ morphologically from their nearest world analogues. Pedder also possessed the largest dune system on any Australian glacigenic lake. Behind the dunes lay the Maria Lakes and their braided stream complex.
- The Landform contents included bio-species that included several endemic invertebrates and rare plant species (Galaxias pedderensis was declared extinct in the wild in June 2005. Geo - 'species' present included Pedder Pennies which consist of a rim around a single stone (40-50% Fe; 0.003-0.1% Mn). Few analogies occur in Tasmania and none identical – there are differences in form at 2 or 3 other lakes (eg. multiple core pennies at Basin Lake). Morphologically similar forms occur in the Gulf of Finland but Pedder Pennies are genetically more similar to forms in some Canadian freshwater lakes although the Fe content is much higher & Mn hugely less at Pedder than in Canada. Thus Pedder Pennies are important components of world geodiversity. If we were talking biology, they would be considered a Rare & Threatened Species deserving of legislative protection.
- In terms of human use, utilised values included Inspirational, Spiritual, Scenic, Recreational and commercial tourism values. Unrealised values included science and education. The value and potential of Pedder persisted until the dam commenced filling in 1973.

Has Lake Pedder been destroyed by the dams?

- Echo-sounding has revealed that key breaks of slope are still identifiable beneath the reservoir, and bottom sampling has recovered identifiable plant remains & intact Pedder Pennies. The original lake basin remains intact and the glacial features that could not naturally recover if damaged also remain intact. The reservoir is a low energy environment hence there are no sources for widespread minerogenic sediment. Core samples obtained by

diving to the original Pedder beach in 1993 revealed only 3 mm of gyttja (planktonic remains) overlying the original Pedder beach sand. Accumulated sediment had not even filled aircraft tyre tracks on original Lake Pedder beach.

- Of the features produced by processes that continue under present climate (& hence could effect natural healing of any damage), the stream channels, beaches, bars & megaripples remain intact; there was minor cutback of dunes (~ 5%) during filling was not all that much greater than natural winter erosion (the depth of reservoir now insulates the dunes from wave action); and fibrous peat over dunes & wider area remains intact forming a protective blanket & potential medium for revegetation.
- So Pedder itself is recoverable, at least for now, although it is unclear for how much longer the task of restoration can safely be left in abeyance. But what about the wider area? There is a reservoir "bathtub ring" but this does not affect Lake Pedder directly and the low angle slopes imply minimal visibility of this ring from Pedder beach. The disturbance severity varies but the limited fluctuation of the reservoir level means it appears similar to discontinuous stretches of vehicular track and would rapidly be obscured by vegetation as the first stage of recovery. But many apparent erosion scars are really only thin minerogenic sediment deposited onto intact peat. Extensive areas exhibit no erosion, the vegetation having died but the peat remaining intact. The remoteness of the area implies minimal risk from invasive species once the reservoir is drained.

Implications of the Pedder reservoir for the overall power development.

- There are two reservoirs, both of ca. 260 km^2. The main impoundment is on the Gordon River which provides 60% of the inflow. Lake Pedder was flooded beneath the contributing Huon – Serpentine impoundment (Serpentine River – 38%, Huon River – 12%). Lake Pedder was flooded to gain the extra 12% from the Huon River. The joint H-S reservoir fills the valley bottoms so as to allow the Huon water to flow over this "fill water" by gravity towards and across the Huon-Serpentine divide and thence by canal to Gordon reservoir. Level fluctuation in the H-S reservoir is restricted by statute to 1.5 m (and there is no point dropping it too low because then the Huon water would not flow over the divide into the Serpentine catchment).
- Options to flooding Lake Pedder were available from the outset but were rejected. They included alternative engineering layouts that by-passed Lake Pedder (and would have increased the cost of the development by 4.3%) or deleting the Huon water entirely (which would have reduced the available water by 12%). Electricity is generated only from the Gordon reservoir and there is no capacity to generate directly from the Huon-Serpentine reservoir.
- Tasmania has effectively placed virtually all its energy generating eggs in the one drought and climate change-prone hydro electric basket. As at 7 February 2008 the H-S reservoir was 1.48 m below full but planned normal full supply level has seldom been achieved even with the additional 12% of water from the Huon River. Extensive areas behind the dam are very seldom inundated and there has been considerable re-vegetation of some of these. As of 7 February 2008 the Gordon reservoir was 38.54 m below full.
- While hydro-electricity is less polluting than some other means of energy production, other issues also require consideration such as a potentially drying climate, the loss of active carbon sequestration by the drowning for the life of the project of large areas of respiring vegetation and peat soils, and the massive loss of a site of World Heritage values being caused by keeping Pedder flooded.

Implications of the restoration of Lake Pedder for the Tasmanian WHA

- Restoring Lake Pedder would achieve recovery of a precious place, of an Australian environmental icon, and of natural system integrity consistent with WHA Guidelines, particularly with regard to safeguarding the complete set of glacigenic landforms in the area.

- It would also eliminate a major re-entrant into WHA boundaries & associated management issues. It would provide an invaluable learning experience for a world in which rehabilitation and restoration are becoming ever-increasing needs.
- It would also help engender hope. In the words of Edward St John QC, a member of the 1974 Australian Government Enquiry, "The day will come when our children will undo what we so foolishly have done."

Recommendations

1. It would be fitting for the World Heritage review process to note the continuing importance of Lake Pedder and further encourage its restoration.

2.1.5 Wilderness Value and its Maintenance in the TWWHA

- The Introduction to the United States Wilderness Act 1964 provides the following definition of wilderness:

  "A wilderness, in contrast with those areas where man and his works dominate the landscape, is an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain."

- Although 'wilderness is not a recognised World Heritage value, Peter Hitchcock famously adopted it as the context for all the TWWHA values in his dissenting report from the Helsham Inquiry. This use of the concept still seems the best way of recognising the wilderness values of the TWWHA.
- As its name implies, it is the wilderness qualities and its associated untrammelled and natural features that provide the core values of the TWWHA. As acknowledged in the TWWHAMP (p.23), the Tasmanian Wilderness WHA "*comprises a large percentage of the remaining extensive, high quality, temperate wilderness in Australia and is one of only a few such regions in the world. It is this wilderness quality which underpins the Tasmanian Wilderness WHA's success in meeting the criteria as a natural property and which is the foundation for the maintenance of the integrity of both the natural and cultural values of the area.*"
- In a world characterised by the fast pace of modern living, wilderness is a truly rare commodity which must be preserved.
- "Wilderness" as a practical concept is possibly meaningless and difficult to use these days and the vague use of the term by wilderness activists is partly responsible for this. There have been studies that aimed to define and measure the concept, and this is an important approach to effectively argue that loss is occurring.
- A wilderness quality mapping exercise was undertaken for the RFA utilising the methodology developed by the AHC in the late 1980s, but this mapping has numerous small errors, ignores some matters, and was undertaken in a defensive political context.
- In 2005, PWS developed a refined (from the AHC approach) methodology to wilderness mapping that in the TNPA's view addresses many of the problems of its predecessors and was used to map the TWWHA and some peripheral areas. It aims to be used internally in the PWS for development (RAA assessments) but is not publicly available.
- None of these assessments take viewfields into account. This is critical for assessing broad scale threats and impacts (eg, forestry logging). This was to be the next step in the PWS approach, but this has not been progressed for various reasons (including lack of funding).

Recommendations

1. That wilderness quality mapping that recognises the range of issues for wilderness quality and its measurement, including viewfield assessment, be undertaken for the TWWHA. This is essential to protecting the significant 'wilderness' quality that is the keystone value for the TWWHA.

2.2 Management of Areas Adjacent to the TWWHA

2.2.1 Recherche Bay [3]

- The waters of Recherche Bay abut the TWWHA at Cockle Creek, and the Southern Peninsula east of Cockle Creek is national park which abuts the TWWHA.
- Recherche Bay is the location of the 1792 and 1793 visits by the French Expedition to find La Perouse led by D'Entrecasteaux [D'Entrecasteaux Expedition]. The expeditions anchored in Recherche Bay on both occasions and carried out seminal and significant botanical collecting, geomagnetic observations, rare friendly interactions with the Aboriginal people (providing highly significant unparalleled ethnographic data (refer Mulvaney 2007)), undertook exploration, named places, established gardens and took on water and supplies.
- As a result the Recherche Bay is considered to have extremely high cultural significance with respect to a range of values; and the historical and associative cultural landscape values have been recognised as being of national level significance , including through listing of a small part of the area (essentially the contended NE Peninsula logging area plus adjacent reserve land).
- The cultural heritage values of the area however have not been fully assessed (in particular the cultural landscape values) and they have not been protected through listing. The Natural Heritage listing is for only part of the area, and Tasmanian Heritage Register listing of only the 100m/70m coastal margin arguably only recognises and protects the potential archaeological values.
- It is contended by a number of heritage experts (including the majority of practitioners in Tasmania and by the participants at the Joint Academies symposium on Recherche Bay, Hobart, Feb 2007) that Recherche Bay as a whole is of extremely high significance, and probable outstanding universal value as a key site of early exploration in the Southern Hemisphere representing the themes of 18th and 19th century global colonial exploration and expansion, and global exploration and mapping; and should be considered for inscription on the World Heritage list as part of a serial nomination of key sites representing this theme.
- The area is also regarded as being of extremely high significance for its Aboriginal historical values and associations, including for the first (and rare) friendly contact with non-Aborigines (the French) and the detailed ethnographic observations that were made here (Mulvaney 2007)[4] These values are recognised in the National Heritage Listing. These values are complementary to the present Aboriginal World Heritage values, and if included in the TWWHA would be a first step in recognising the ongoing Aboriginal occupation of, and connection with, Tasmania, and Aboriginal cultural landscape values.

[3] Refer also TNPA Submissions on Recherche Bay, 2005-6, Attachment 6.

[4] Mulvaney, J. 2007 *'The axe had never sounded' place, people and heritage of Recherche Bay, Tasmania.* ANU Epress and Aboriginal History Incorporated.

- The southern part of Recherche Bay (Cockle Creek East) is at risk from development, in particular a large resort development within the National Park. The State government approved this lease even though the area was in a national park area and that area was being managed under the TWWHAMP (the area abuts the TWWHA and is/was to be incorporated into the TWWHA at the next plan review. This necessitated management plan changes (refer Section 2.1.1, above).
- The North East Peninsula in the area of the National Heritage listing was under threat from logging as, in spite of the recognised values of the area, forestry is exempt under the EPBC Act 199 (C'wlth) and the *Historic Cultural Heritage Act* 1995 (State). In spite of calls to review its decision, the State government maintained that there were no cultural landscape values and that forestry would not affect any cultural values (without having carried out adequate studies to determine the values). The issue was only resolved by extensive activism and the sponsorship of the purchase of the private property block to be logged by a private individual.
- The associative cultural landscape values more broadly (at this stage not fully assessed but considered to apply to Recherche Bay and its visual catchment (ie, recognising setting) – which takes in the area from the coast to the TWWHA boundary) are also at risk from forestry operations (there is some State forest between the coast and TWWHA boundary), government sponsored tourism development in the national park, and other potential development.

Recommendations

1. That the reserved land in this area be formally incorporated into the TWWHA to protect and celebrate the values relating to the 1792/3 French expedition and the Aboriginal values of the area.
2. This area should be fully assessed as a matter of priority (given the threats), and the full area considered for inclusion on the National Heritage List. This should be sponsored by Tasmanian government through the PWS, since the PWS is the main land manager of the area and has an obligation to identify and protect WHA values under the EPBC Act 1999.
3. Consideration be given by the Australian government to developing a serial Southern Ocean - Australasian early exploration sites World Heritage nomination, to include Recherche Bay.

2.2.2 Cox Bight and the South West Conservation Area

- The corridor of land extending southwards from Melaleuca Inlet to Cox Bight (known as the Melaleuca-Cox Bight enclave) is bounded by Tasmanian Wilderness World Heritage Area (TWWHA). In December 2007 the Government announced that an application by Planet Mineral Pty Ltd for a mining exploration licence in the area "will be granted".
- The Melaleuca-Cox Bight enclave is rich in natural and cultural values and should be preserved. The TNPA believes that this would best be achieved by including it within the adjacent Southwest National Park and TWWHA. Indeed, the 1990 report *The Appropriate Boundaries of a WHA in Western Tasmania, Dept Parks, Wildlife and Heritage*, (cited below as the *Boundaries Report*) noted that: "*The area is an integral part of the surrounding World Heritage Area in terms of landscape, management, recreation and tourist use...and presently possesses an unnatural boundary consisting of a series of straight lines*" (p. 53).
- The IUCN has twice recommended that this area be included in the TWWHA. In its October 1989 report, the IUCN noted the following concern on the integrity of the TWWHA of existing small-scale mining operations in several locations, including those within the

Melaleuca-Cox Bight enclave: *"their existence ..., along with the access to them is inimitable to the wilderness values of the site"; and "it is hoped that their operations will gradually be phased out and restoration undertaken of the disturbed area."* Furthermore, the World Heritage Committee, at its meeting on 13 December 1989, when the Tasmanian Wilderness was added to the World Heritage list, noted that: "*there were some small enclaves of publicly-owned land with World Heritage values currently excluded from the nomination and expressed the hope that these could be added on in future*" (quoted in *Boundaries Report*, p8).

- The *Boundaries Report* in reference to the Melaleuca-Cox Bight enclave included the following two conclusions (p. 54): *"The integrity of the World Heritage Area, in terms of both values and management, would be improved by the addition of the Melaleuca-Cox Bight area."... "Clearly, the entire Melaleuca-Cox Bight area should be incorporated within the World Heritage Area*

- In a letter from the Department of Mines to the Parks and Wildlife Service, dated February 1989, it is stated that while the Department of Mines could not accede to a request to include the Melaleuca lagoon-Cox Bight area within the WHA due to ongoing mineral exploration, it *"is conscious of both the irrational nature of the Conservation Area boundary, and the considerable World Heritage values of the Cox Bight foreshore, Freney and Melaleuca lagoons*." The letter concludes by stating that the Department would support investigating in the future *"the inclusion in the World Heritage Area of the whole Cox Bight – Melaleuca enclave..."*.

- The TNPA understands that the intention was that the area become WHA when mining licences expired or mining activity ceased; and towards achieving this outcome the Tasmanian Wilderness World Heritage Area Management Plan 1999 contains the following management prescription for the Melaleuca-Cox Bight enclave concerning Mineral Exploration and Mining (p. 205): *"Seek to ensure that the current consolidated mining lease at Melaleuca is cancelled once the existing lessee ceases mining."*

- Mr Peter Hodgman MHA, the then Minister for Environment and Land Management attempted unsuccessfully to move on this in 1997, but it remains an obvious step to take.

- The South West Conservation Area was similarly been excluded from the TWWHA to allow for the mineral potential of the area to be recognised through mineral exploration and mining. Again, this area contains contiguous TWWHA values that should be recognised and protected. In particular the northern part of this area contains extremely important orange bellied parrot habitat, also the site of a recovery programme: It makes no sense from a conservation and presentation perspective to keep removed World Heritage and other values on public estate from the TWWHA because of a potential use value, the realisation of which is not compatible with the maintenance of these values and poses risks for adjacent TWWHA values.

Recommendations

2. The present application for a mineral exploration licence by Planet Minerals Pty Ltd be rejected as it contravenes the original intention for management of the Melaleuca-Cox Bight enclave and would seriously compromise the values and integrity of the TWWHA.
3. As the TNPA understands that all mining in the Melaleuca-Cox Bight enclave has now ceased the TNPA recommends that steps should now be initiated to incorporate this area into the TWWHA in line with the above management recommendations.
4. In parity with the Melaleuca-Cox Bight area, the TNPA recommends that steps should be initiated to incorporate this area into the TWWHA in tandem with the Melaleuca-Cox Bight area.

2.2.3 Riveaux Karst Area

- At the time initial roading was undertaken no limestone had been mapped in the area, and the presence of limestone was not identified during actual construction because it was overlain by other rock. A later Mines Dept mapping project in the area recognised the presence of some limestone but failed to detect limestone at the site where the first cave was subsequently discovered. One cave was found some years later while a Forestry Tasmania employee was marking out the coupe/streamside reserve boundary in early 2000. The main branch of the cave was subsequently surveyed and water tracing experiments were undertaken. Additional caves were discovered in the area. The cave discovered by FT was found to be very significant. Mapping revealed that the road was constructed directly over it. There was evidence of damage to the cave by sediment washed in from roadworks and potential for this to worsen considerably. The stability of the road itself was questionable.

- The management response by Forestry Tasmania has been inadequate and the area remains under threat. The Forest Practices Board (FPB) recommended a two-stage rehabilitation process for the road involving immediate measures to reduce sediment release into the system before the worst of the winter rains, and later complete road deconstruction and re-contouring. The first stage was not completed in time for that winter and the second stage has yet to occur.

- In-cave management issues also exist and FT lacks the technical expertise to address these adequately. Caves evolve over geological rather than human time scales, hence caves have no natural carrying capacity as do bushwalking tracks (where one can identify some theoretical vegetation recovery time should damage occur). Damage to caves is effectively permanent. Tasmania's other major cave areas have all been subject to the pressures of recreational caving and other development. This new discovery provided a rare opportunity to maintain a sample of caves in a pristine condition, with (1) no disturbance of their physical features, (2) no removal by amateur collectors of specimens from small populations of cave-adapted invertebrates, and (3) no disturbance of the microbiota that is inevitably contaminated when cavers enter caves (no attempts have been made to protect microbiota in any Tasmanian cave). Logging and caving both jeopardised the potential for these aims to be achieved. The FPB recommended that visitation to the caves be discouraged in order that they remain uncontaminated by human entry and safeguarded from the sorts of damage customarily inflicted on caves by amateur caving enthusiasts.

- Geological mapping remains incomplete, but the fact that the new cave occurred in an area not mapped as limestone raised questions regarding the extent of likely karst. In addition to the Gordon Limestone in which the new cave occurred (the same rock type as contains the Mole Creek caves), a large area of dolomite was already known to occurs further west - the same rock as contains the Hastings Caves. On the basis of new knowledge it seemed likely that karstic rocks were very widespread in the area.

- Further discoveries are to be anticipated because the natural values of the area have not been fully researched and proper evaluation will take time, money and expertise. Karst areas do not give up their secrets easily. Even in farmland that has been largely cleared for a century or more new caves are still found from time to time - a two-year karst inventory of the forested Junee-Florentine karst was undertaken a few years ago, but notwithstanding the fact that an extensive system of roads and tracks covered the area and that considerable information had already been revealed by recreational cavers who had very been active in the area for over 50 years, the data quickly proved inadequate for detailed operational planning.

- The FPB recommended that no logging occur and that a moratorium on any further forestry disturbance of the area pending decisions on its long-term future. FPB provided FT with draft terms of reference for a major integrated study. It was stressed that the geomorphological component of that study should cover not just the karst but aim at

understanding the relationship of the karst in context with other elements of the geomorphoplogy such as the legacy left by past glaciers and cold climate processes on slopes that have strongly influenced cave evolution. It was proposed this research be undertaken by means of predominantly surface techniques to minimise the potential for damage to caves or their contamination by human entry. A small study was commissioned by FT. Its scope fell far short of that recommended and its brevity precluded more than cursory examination.

- Subsequent discovery of Aboriginal art underground has enhanced the already very high World Heritage values of this site. This art complements the archaeological record contained within the existing WHA and its formal inclusion would enhance the integrity of the cultural values which the WHA seeks to safeguard.

Recommendations

1. The karst at Riveaux is already known to be very significant for geodiversity conservation and cultural heritage at a global level. The area is too important for logging to be permitted for reasons of natural and cultural value and it should be included in the WHA. The area is a re-entrant into the existing WHA boundaries. Its retention as state forest also makes little sense because much of the area could not be logged consistent with Forest Practices Code requirements due to duty-of care constraints related to maintaining soil and water values.

2.2.4 Upper Florentine Valley

- The Junee-Florentine caves, which evolved partly in response to torrential discharge of glacier meltwaters and offer insights into natural climate change have since also revealed relicts left by ice-age humans; bones of extinct ice-age megafauna; and invertebrate fauna adapted to the perpetual darkness of these caves and found nowhere else on Earth. For these reasons they are of global conservation significance.
- Much of the Junee-Florentine karst has been heavily impacted by logging but the upper Florentine Valley hosts significant karst that remains intact. The dissolving of limestone by waters that descend from the plateau and are acidified within the forest soils by biologically-produced carbon dioxide is a critical natural process in these caves which are sensitive environments that are highly susceptible to land management practices.
- In addition to the World Heritage values of the karst, the Mt Field plateau that overlooks it is also significant for geoconservation reasons, notably with respect to its glacial geomorphology and the implications that the legacy of past glaciation has for better understanding global environmental change and evolution.
- The *National Park and Florentine Valley Act* 1950 revoked 1490 ha of forest in the Florentine Valley below Mt Field West (Figure 1). As compensation, 1640 ha of mixed forest was added to the southern margin of Mt Field National Park. The informal Junee Cave reserve has also been re-designated a State Reserve (8 September 1976), albeit still protecting only the outflow point of this extensive underground river rather than the extraordinary cave system through which it flows.
- In 1946 the Tasmanian Caverneering Club visited Junee Cave on its first official outing, penetrating only a short distance before being thwarted by a water-filled passage that continues to challenge cave divers today. But over subsequent decades many tributary caves have been explored, involving the establishment of successive Australian cave depth records as explorers penetrated further into this extraordinary underground system. Retention of the forest and soil cover, and catchment stability, together with proper management of recreational impacts, are key requirements for protection of this remarkable underground heritage.

- Logging that followed revocation of the Mt Field West forests occurred at a time when the presence of caves in the general area was well known but documentation remained very deficient and there was little understanding of their value or sensitivity. Road construction, timber felling and extraction practices saw serious soil erosion including scalping of vulnerable karst soils that control the chemistry and release of critical natural seepage to caves. Debris was dumped into sinkholes that fed water underground, causing sedimentation of underground streams.
- New caves were found in the area revoked, both within the Junee catchment and further north. Welcome Stranger Cave (discovered 1969), is a highly decorated stream cave over 1 km long.
- The new park boundary left half of this cave in Mt Field National Park, and the other half in production forest which was clear-felled. Dehydration and consequent physical degradation of the previously sparkling flowstones in the cave followed logging, probably due to increased water uptake by the dense regrowth scrub. Several significant caves have since been discovered in the area added to the southern side of the park to compensate for the revocation, but because disturbance at the upstream extremity of a river cave system enables environmental damage to be transmitted downstream through the entire system, disturbance of the area under Mt Field West was the worst possible scenario for the Junee River system.
- In 1966 intense fires that originated as management burns in the Australian Newsprint Mills concession caused major damage to other parts of the park. Large areas of forest overlying karst were also burned. This destabilised some slopes causing landslides that delivered massive volumes of sediments into caves and the underground plumbing systems generally.
- On Black Tuesday, 7 February 1967, bushfires elsewhere in southern Tasmania killed 62 people and destroyed over 1300 homes, profoundly sensitising the population with regard to issues of fire hazard. Less than a fortnight after the Black Tuesday fires Forestry Commissioner Crane wrote to the Scenery Preservation Board to convey an Australian Newsprint Mills suggestion 'that it could be of advantage to the Scenery Preservation Board if salvage operations were extended to include the burnt timber in the park. Logging was conducted from 1969-1972 and, as a consequence, impacts of road construction and logging, management fires and slope destabilisation were now extended to additional areas. Major visual impacts resulted and the karst and its catchment further disturbed, including some of the most sensitive parts of the karst where headwater streams draining the mountains first encountered the limestone and, hence, where cave development was most pronounced.
- Predictably, many new caves were discovered as the forests were levelled. Tassy Pot, located inside the park boundary, became for some years the deepest cave known in Australia. Its exploration was made extremely hazardous by loose boulders and logging debris that had been bull-dozed into the entrance and which plummeted unpredictably down the 50 m entrance shaft whenever disturbed by movement of the ropes and flexible ladders used by cavers to descend or ascend.
- Other reported impacts of road construction, logging and fires included physical damage to caves by blasting, soil erosion, landslips, cave stream siltation, and failed regeneration of forest.
- The Australasian Cave and Karst Management Association, the regional professional body of karst managers, recommended at its 1991 conference that the Junee-Florentine karst system simply be included in the park. Some informal planning and reservation decisions followed a karst inventory exercise in the early 1990s.
- Karst however was not included among the nationally-agreed criteria for the establishment of a Comprehensive, Adequate and Representative Reserve System for Forests in Australia (JANIS Reserve Criteria), hence, no secure karst reserves were established following the 1996-97 Tasmanian Regional Forest Agreement process. Some measure of recompense for

the damage inflicted upon this important karst remains long overdue, together with meaningful rehabilitation initiatives.

- In responding to claims for the protection of natural areas some forestry advocates complain industry is always the loser. The history of Mt Field National Park shows this assertion is unsustainable. Over 5 500 ha of Tasmania's National Parks have been permanently revoked to allow logging of areas once supposedly preserved in perpetuity. The extent of park revocation in Tasmania contrasts with a history of minimal revocation elsewhere in Australia - no other Australian state has adopted a policy of park revocation quite so readily. While Tasmania may have a greater percentage of its total area under reservation than any other state, this smallest state has permanently revoked a greater area of national parklands, in absolute square kilometre terms, than has any other state, possibly greater than the total area revoked in all other Australian states combined. And almost entirely for logging.
- Important management problems persist at Mt Field itself. Park boundary design remains wholly inadequate, with arbitrary cadastral boundaries cutting across natural systems such as the caves.
- Inclusion of the upper Florentine Valley in the WHA would provide protection for the last undamaged part of the Florentine karst, and would involve protecting the upstream end of the karst system where it will not be subject to the devastating downstream-transmission effects that have been so damaged other parts of this karst belt.
- The Upper Florentine Valley also has significant Aboriginal heritage values (significant Pleistocene occupation sites) –

  - these are primarily Aboriginal shelters in limestone with significant evidence of Aboriginal occupation (in the form of occupation deposits and in one case skeletal material), the key sites being Nanwoon Cave, Nunamira Cave and Beginners Luck Cave;

  - two of the sites are demonstrated to be Pleistocene sites and the other has significant values, hence these complement the Pleistocene sites in the TWWHA

  - although the key sites were identified during the Helsham Inquiry the Aboriginal heritage values of Nunamira and Nanwoon Caves had not been fully assessed, and Beginners Luck Cave was considered too far from the WHA boundary to be included at that time

  - TWWHA extension to incorporate these values was recommended by Lennon (2002)

  -the Aboriginal heritage values are very high and complement the suite of Aboriginal values of outstanding universal value in the TWWHA, hence should be included in the TWWHA.

Recommendations

1. The significant karst and Aboriginal heritage values of the Upper Florentine be recognised and protected by inclusion in the TWWHA. These values, and karst values in particular, have been impacted and are at further risk from forestry operations. The area, specifically the upper Florentine down to and including the Lawrence Creek system and across to join the Mt Field National Park should be considered for inclusion to ensure the long term protection of these values.

2.2.5 Navarre Plains

- The Navarre Plains lie south of Lake St Clair and stretch between Mt Rufus in the west and Bedlam Wall in the east.
- From a geomorphological perspective their importance lies in the fact that they fill the old pre-Glacial course of the Derwent River, and that the glacial and glaciofluvial sediments of

which they are formed comprise a natural dam that partly accounts for the depth of Lake St Clair, Australia's deepest lake and an integral part of the WHA. Thus their protection would enhance the integrity of the existing WHA.

- Further, the glacial sediments of the Navarre Plains play an important role in explaining key stages in earth history. The glacial trough in which they lie was repeatedly glaciated during the late Cainozoic prior to the most recent deglaciation at the end of the Last Glacial Cycle, when the Derwent Glacier reached just south of the present shoreline of the lake and discharged meltwater and glaciofluvial sediment southwards, swamping older moraines that document earlier episodes of glaciation. This depositional record is critical for understanding earth history.
- While the area further downstream has been inundated by an artificial reservoir, the glacial record from north of this reservoir remains accessible. It covers key parts of the record that have been lost from the valleys down which other major glaciers flowed from the Central Highlands ice caps, such as in the Mersey Valley where the corresponding material has been quarried away for construction materials or flooded beneath hydro electric storages.
- The Navarre Plains also has significant Aboriginal values in relation to historical, and probable earlier, Aboriginal occupation. George Augustus Robinson's journal (Plomley 1966) indicates that the Navarre Plains was a significant Aboriginal camping and gathering area post-European contact. An assessment of the Aboriginal values of the Overland Track and Frenchmans Cap Track in the TWWHA (TALC 1999) supported the idea that the Navarre Plains was an important node for historic Aboriginal travel.
- These identified Aboriginal values are supported by key major sites in and adjacent to the TWWHA (eg, at Mt Rufus and Laughing Jack Lagoon). The area however has not been comprehensively assessed for its Aboriginal values, including Aboriginal sites.
- The Navarre Plains north of the Lyell Highway forms a small ambiguous State Forest area surrounded by the TWWHA. Forestry operations impact on the ability to present the current TWWHA and its values. This area should therefore be included in TWWHA.
- A more logical boundary and better presentation of the TWWHA in this area could be achieved by making the Lyell Highway the southern boundary of the TWWHA between the current western boundary near the Navarre River, east to the Clarence River.

Recommendations

1. The small area of State forest north of the Lyell Highway between the King William Saddle and Derwent Bridge should therefore be included in TWWHA to enhance the presentation of the TWWHA, include complementary values and eliminate the risk of impacts from forestry operations.
2. Consideration should be given to incorporating the full area north of the Lyell highway to the southern boundary of the TWWHA and between the current western boundary near the Navarre River, east to the Clarence River to create a more logical boundary which would better present the TWWHA in this area.
3. A comprehensive Aboriginal values study of the Navarre Plains should be undertaken to support the management of the known and potential values of the area.

2.2.6 Great Western Tiers Upper Escarpment

- The Great Western Tiers contains a substantial number of sandstone rock shelters in the Permo-Triassic sediments which outcrop in a belt on the upper slopes of the Tiers escarpment.
- The extent of these has only been established since the later 1980s through research conducted primarily by Forestry Tasmania. Other recent research (refer Lennon 2002) has established that some of these sites include Pleistocene evidence.
- This suite of sites therefore provide significant evidence of Pleistocene and later occupation and use of the area (including the WHA), they are an uncommon site type in the TWWHA, and therefore the Pleistocene sites in the TWWHA.
- The area has other Aboriginal heritage values acknowledged by the Aboriginal community.
- It is possible other Aboriginal sites and values occur in this area, but the area has not been comprehensively studies for Aboriginal sites and other values.
- The area is State Forest and the sites are mainly in wood-production areas. The area is at risk from impacts of logging (eg, landslips due to vegetation clearance, and direct disturbance due to logging). The Aboriginal community also regards the forestry as impacting on the broader Aboriginal values of the area. Wood production forestry therefore cannot be considered the best management regime for these sites.
- The area containing these sites runs parallel and close to the northern boundary of the TWWHA. Given the Aboriginal heritage values of the area, it should be considered for inclusion in the TWWHA. This has been advocated by the Aboriginal community, and TWWHA extension to incorporate these values was recommended by Lennon (2002).

Recommendations

1. The northern margin (escarpment) of the Great Western Tiers, specifically an area contiguous with the TWWHA boundary from Western Bluff to Projection Bluff which includes the band of Permo-Triassic bedrock, should be included in TWWHA. This would help ensure the long term protection and recognition of the significant evidence of Aboriginal occupation from the Pleistocene to present in this area which is of a type that is very poorly represented in the TWWHA, and which are complementary values to the presently recognised TWWHA Aboriginal heritage values.
2. A comprehensive Aboriginal values study of this part of the Great Western Tiers should be undertaken to support the management of the known and potential values of the area.

2.2.7 Mill Creek - Kansas Creek area, Mole Creek Karst

- The Mill-Kansas area near Mole Creek, which contains the Croesus-Lynds-Tailender caves system, has been proposed for protection for many years. The area is best known for the spectacular rimstone pools that occur in Croesus Cave and which are of such significance as to have been cited in international karst literature as being superlative examples of this type of formation.
- The caves cannot be protected without safeguarding their catchment, but although part of the upper catchment is already within WHA boundaries the caves which it feeds in this area are not included. A further major new cave has been discovered in the last few years and more are discoveries are likely in due course. This is also the last area of the Mole Creek karst in which it is possible to secure a transect through the karst from the mountain catchments to the Mersey River into which the caves discharge.

- Proposals for protection of this area go back many years and although a State Reserve was declared in the early 1970s it protects only the downstream extremity of the principal caves leaving their catchment unprotected. Logging in these catchments is likely to transmit serious impacts downstream into these caves. There have been numerous proposals to remedy this situation (eg. in the 1984 karst forestry report produced within the Forestry Commission; in a consultancy report prepared for the Forestry Commission by Spate and Holland; and in the report of the Balanced Panel of Experts during the Tasmanian Forest and Forest Industry Strategy process). None of these have borne fruit. A paper on the hydrological relationships in the area and required protection boundaries was published by Forestry Tasmania in *Tasforests* 6, which also featured a cover photo of one of the caves in this system.
- Internal protocols within Forestry Tasmania are inadequate to protect this area. For example, it was recommended by the FPB's Senior Geomorphologist for protection under Forestry Tasmania's Management Decision Classification system but was not subsequently zoned for protection and indeed a significant part of it was not even been given the status of an SMZ for geoconservation values. Karst values were not properly taken into account by the planner responsible for preparing the final sheet. For example, although maps of the main karst features in the area have long been available, a streamside reserve is shown extending down Kansas Creek beyond the point at which the stream passes underground, a fact that was indicated to the planner concerned in the office and also showed to him during a field inspection. On the other hand, the area immediately adjacent to a major cave at the stream sink was accorded no protection, hence it looks as though the karst was simply been disregarded and the lines have been drawn as if this was a conventional fluvial landscape rather than karst.
- When the MDC boundaries were drawn up the FPB (then FPU) specialists indicated their acceptance of the boundaries by signing off each individual map sheet, doing so in good faith. In this instance, linework that remained legible on the original map that bore the specialist "sign-off" sticker was not been transferred to the MDC. Since further discoveries in the area a putative joint management protocol between FT and the Parks Service has been established, but this still leaves the area lacking formal statutory protection of a kind that would prevent it being logged or quarried for limestone.
- The situation that presently exists appears inconsistent with the requirement in the *Public Land (Administration & Forests) Act* that Forestry Tasmania protect important landforms; it seems inconsistent with the earlier PLUC recommendation that the conservation of geodiversity be a major management goal for state agencies; and it is inconsistent with less formal guidelines such as the Australian Natural Heritage Charter. While effective protection of karst values around Mole Creek is often complicated by the presence of private land blocks, only Crown Land is involved in the proposed Mill-Kansas reserve and hence the situation there could be resolved with relative ease. This matter should be resolved by immediate inclusion of the area within the WHA.

Recommendations

1. The Mill Creek-Kansas Creek area near Mole Creek, which contains the Croesus-Lynds-Tailender caves system, which has been proposed for protection for many years, but is still inadequately protected, be included the full area within the TWWHA to ensure its proper conservation and to recognise the high level values of this area.

2.3 Fire Management Related

This area is not discussed in more detail in this Section (refer summary comment Section 1). This is not an area of expertise of the TNPA and it is understood that other non-governmental organisations better placed to comment on this issue will be making detailed comment on this issue to the World Heritage Mission.

Where relevant, fire management related matters are included in the discussion of other issues (primarily in Section 2.2).

2.4 Forestry Management Related

This area is not discussed in more detail in this Section (refer summary comment Section 1). This is not an area of particular expertise of the TNPA (although some individual members have considerable expertise in this area) and it is understood that other non-governmental organisations better placed to comment on this issue will be making detailed comment on this issue to the World Heritage Mission.

Where relevant, forestry management related matters are included in the discussion of other issues (primarily in Section 2.2).

3. Attachments

1 Tasmanian National Parks Association Manifesto

2 Chronological Summary of Post-Helsham Inquiry Key Events, Studies, Etc.

3 TNPA News 8 (Autumn 2007) article – 'Illegal Helicopter Landings in the Tasmanian Wilderness World Heritage Area'.

4 TNPA News 7 (Spring 2006) article – 'Tasmania's Parks & Reserves Scientists – An Endangered Species'.

5 TNPA News 6 (Autumn 2006) article – 'A Lake Pedder Parallel? Hetch Hetchy Valley – Towards Restoration of a World Conservation Icon'

6 TNPA Submissions to the Tasmanian government in relation to Recherche Bay, 2005-6.

7 TNPA Submission to the Tasmanian government in relation to the State Budget and Funding for Parks management and Community Involvement, 2006.

8 TNPA Submission to the Tasmanian government in relation to proposed mineral exploration in the Cox Bight-Melaleuca Area, 2008 – *not attached as previously forwarded to the World Heritage Centre.*

Note: the TNPA have made a range of other submissions on matters discussed in this submission and related to the management of the TWWHA. We can provide others on request.