



Cassy O'Connor, Greens Leader

Thursday, 9 April 2020

TWWHA Tourism Master Plan Project Manager
Project Management Office
PO Box 44
Hobart TAS 7001

Dear Project Manager,

I write on behalf of the Tasmanian Greens to respond to the draft TWWHA Tourism Master Plan (the Tourism Master Plan).

The draft Tourism Master Plan is not fit for the purpose described by UNESCO, nor does it resolve any of the outstanding issues in relation to commercial tourism in the TWWHA and its impact on wilderness, cultural and recreation values.

Regrettably, the plan has been compromised by the fact it is being delivered five years after the World Heritage Committee requested the State party develop a tourism master plan for the TWWHA that protects the property's outstanding universal values.

The draft plan is further compromised by the rewriting of the TWWHA Management plan in 2015 to facilitate increased commercial development and, the ongoing efforts by government and private developers to progress commercial developments inside the TWWHA and other protected areas through the Expressions of Interest process.

The Greens maintain the EOI process is a subversion of good planning process, that it is not transparent and alienates Tasmanians from decision making over their own protected areas.

Our submission will be confined to the scope of the Tourism Master Plan and the Reserve Activity Assessment process.

Scope of Tourism Master Plan

In 2015, The United Nations Educational, Scientific and Cultural Organisation's (UNESCO) World Heritage Committee sent a reactive monitoring mission (the mission) to Tasmania to examine matters related to the Tasmanian Wilderness World Heritage Area (TWWHA).

The mission formally recommended that – *“The comprehensive Tourism Master Plan details should refine the balance between legitimate tourism development and the management and*

conservation of the cultural and natural values of the TWWHA based on further consultation and negotiation of competing interests.”¹

The report elaborated -

“In the view of the mission, the future management can and should establish a guiding framework acceptable to all involved, while also stipulating the elaboration of a specific and participatory Tourism Master Plan, which will refine where and under what conditions tourism and recreation can and should take place in the future.”²

The scope of the draft Tourism Master Plan includes identification of *“opportunities for the delivery of additional visitor experiences and public infrastructure through an overarching framework to guide and prioritise investment in the area and in a manner that delivers an appropriate spectrum of opportunities.”³*

This is not the purpose of a Tourism Master Plan as discussed by the reactive monitoring mission. The clear purpose is to set parameters around tourism, not to identify opportunities for further tourism under an opaque EOI process that has struggled to obtain a social license.

Reserve Activity Assessment

Chapter 7.9 states -

“If there is limited clarity around the meaning of visitor accommodation, hut or standing camp, and limited restrictions or clarity around the appropriate type of facilities and services to be provided at the visitor accommodation, this can result in a lack of certainty for the community, the assessment authority and the interested parties as to what can be approved in the TWWHA.

Consequently, more detailed guidance is necessary to inform both PWS, private proponents and the community what is appropriate and where.”⁴

A lack of clarity is not the case. There is an existing standing camp policy that clearly articulates what is and is not allowed. The issue that the Lake Malbena case highlighted is the Reserve Activity Assessment processes can recommend a project for approval that blatantly does not meet these criteria⁵, and there is no lawful recourse for an appeal.

The issue is not a lack of clarity of what is allowed according to the policy. The issue is that the RAA processes, being non-statutory and unappealable, can simply ignore the policy. The

¹ International Council on Monuments and Sites and International Union for Conservation of Nature, [Reactive Monitoring Mission to the Tasmanian Wilderness, Australia](#), 23 - 29 November 2015, p. 3.

² [Ibid](#), p. 1.

³ Department of Primary industries, Parks, Water and Environment, [Draft Tourism Master Plan for the Tasmanian Wilderness World Heritage Area](#), 19 March, 2020, p. 5.

⁴ Department of Primary industries, Parks, Water and Environment, [Draft Tourism Master Plan for the Tasmanian Wilderness World Heritage Area](#), 19 March, 2020, p. 71.

⁵ Tasmanian Greens, [Submission to the Lake Malbena Development Application](#), DA 2018/50, 15 February, 2019, pp. 3-4.

solution to the so-called uncertainty is to make the RAA a statutory process, with public consultation and appeal rights.

The policy response in the Tourism Master Plan is to establish a new visitor accommodation policy largely focused on standing camps. The document completely ignores the existing policy⁶, and makes no reference to the fact that Government is currently reviewing the policy after discovering it is incompatible with some EOI proposals.⁷ It is quite clear that this process is being used to re-write a policy that as it currently stands excludes several EOI proposals.

Conclusion

The draft Tourism Master Plan does not fulfil the purpose as described by UNESCO. At best it is an exercise in green-washing, at worst it presents disingenuous pretexts for further weakening provisions such as the existing standing camp policy.

The draft plan prioritises Government policy to develop inside the TWWHA over the protection of the area's outstanding universal values. As long as the EOI process and inadequate statutory framework are in place, we don't have high expectations of the final Tourism Master Plan.

Thank you for your consideration.

Yours sincerely,



Cassy O'Connor MP
Tasmanian Greens Leader

⁶ Parks and Wildlife Service, [Standing Camp Policy](#), Tasmanian Government, December 2006.

⁷ Department of Primary Industries, Parks, Water and Environment, [Standing Camp Correspondence](#), RTI 002 2018-19 stage 1 release, October 15, 2018.