

## BUSHWALKING TASMANIA



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3 June 2020

### SUBMISSION

## DRAFT TOURISM MASTER PLAN FOR THE TASMANIAN WILDERNESS WORLD HERITAGE AREA

### Who Bushwalking Tasmania (BWT) Are

Bushwalking Tasmania (BWT) represents Tasmanian walkers of all kinds, non-club and club. We are non-political and do not support or oppose any political party. Our purpose is to engage with and support Tasmanian bushwalkers and their bushwalking in Tasmania. We and those affiliated with us do an enormous amount of work for public benefit without Government support – tens of thousands of person-days over recent years alone. The breadth of work is wide. Tasmanian bushwalkers are probably the TWWHA's largest single interest and care grouping, yet there is low awareness of their care and work. (This extends to members aiding other entities, like Wildcare or one of its groups.)

### Our Connections to The TWWHA

As mentioned, BWT, its member clubs, members and other supporting individual walkers do considerable volunteer work to care for, maintain and improve the environment and infrastructure within the TWWHA. For example, the North West Walking Club since 1977 planned, created & maintains the 80 km Penguin - Cradle Trail - tens of thousands of person-hours. Some members remove weeds, prune tracks, clear fallen timber and the like. The Hobart Walking Club has run hundreds of working bees in the TWWHA - thousands of person-days care for the TWWHA & to maintain infrastructure. Its members have been at the forefront of exploration in the TWWHA. Members pioneered the route to Federation Peak, completed the first traverse of the Western Arthurs, including naming of the mountains and lakes. Numerous huts, safety shelters and tracks were built by Club members. Similarly, the Deloraine Walking Club has done considerable work, mainly in the Western Tiers area, while the Launceston Walking Club has done considerable work in various TWWHA areas. This is not tourist or visitor stuff!

We Tasmanian walkers care because we have a living cultural tradition and an enduring culture involving knowledge, care, volunteer labour, etc... in the TWWHA. Because of our efforts, the Tasmanian Government has attracted tourists to, and built tourism upon, much of this. The care, sense of responsibility and work make us at least as much custodians of the TWWHA as any other group, and this connection fits with the UNESCO protections for living cultures stated in the appendices<sup>1,2,3</sup> which we want extended to include our cohort. Bushwalking in the TWWHA by Tasmanians is recognised a cultural tradition acknowledged by both State and Federal Ministers in A Way Through The Wilderness, 2001<sup>1</sup>.

PWS has a list of some 450 Tasmanian tracks the vast majority of which were pioneered by Tasmanian bushwalkers. Many of these tracks now form part of the overall infrastructure of the TWWHA. It is not reasonable to deny that **Tasmanian bushwalkers** are key stakeholders with a **strong living cultural heritage in the TWWHA**<sup>1</sup>, deserving more than lip-service<sup>3</sup>. The exploration of the TWWHA and the care and call for its protection in the twentieth century is dominated by bushwalkers.

A motivation for the voluntary efforts is that we are looking after our own backyard to which we are highly connected, and greatly value. It is part of who we are. Many of us have generational associations with the TWWHA. Tasmania, its TWWHA and National Parks are our home. Many of us have landscape-wide values for various areas – it's cultural. We are essential stakeholders in the TWWHA and National Parks; it is part of our lives and as such, **we keenly appreciate** and **want to** look after and **care for** Tasmania, its TWWHA and

National Parks and **retain and enjoy our traditional access free of encumbrance and negative impact on our values.**

#### **Comment on the DTMP**

While we see some improvements in the Draft Plan compared to the TTMP,  
**we strenuously object to being classed as visitors.**

Bushwalking Tasmania is extremely disappointed that our representations to be regarded as traditional users, equal to any others, of the TWWHA, with a recognized cultural attachment<sup>1</sup>, remain ignored or down-played. Tasmanians have associations with it unlike tourists / visitors from, say, Germany, China, New York, Mecca, etc... There is no recognition of **Tasmanian bushwalkers** as **traditional 'users'**, little recognition of contributions made by Tasmanian bushwalkers to the exploration and protection of the TWWHA and the continued relationship using traditional routes, tracks and campsites, and no articulation of the importance of community partnerships beyond those with the Aboriginal community. There is insufficient appreciation of the value of the TWWHA to Tasmanian bushwalkers and many other Tasmanians.

We again remind the plan authors and consultants that bushwalking by Tasmanians has been accepted as a cultural activity<sup>1</sup>. The term 'visitor' utterly disconnects any connection, no matter how strong. This can lead to all kinds of diminishing of our connection and enjoyment of the TWWHA, and has. While we appreciate that the draft TWWHA Tourism Master Plan has words to respect customary activities by non-Aboriginal Tasmanians, there is also a **need to require protection for the (our) customary activities** AND admit we all are owners of the land (this includes Tasmanian Aboriginals). **Tasmanians of whatever origin** with a connection to the TWWHA **must be considered more than visitors**. The protection needs to be an imperative in policy guidelines; conditions to preserve access, affordability and amenity for Tasmanians before any development is considered. An alternative may be to list 'rights' that must be protected for non-Aboriginal Tasmanian cultural activities. PWS, while mostly non-Aboriginal, does not speak for us, but has its sights very largely on 'natural values' / preservation, political wants, general tourism, minimising its costs and making management easy for itself. These can conflict with customary activity.

We have pointed out the large amount of support care and work our members have done in and for the TWWHA. **This makes us custodians** – for instance several members without a Tasmanian Aboriginal forebear have 'custodial' agreements to look after things. Thus it strongly misleads to only cite Tasmanian Aboriginal as custodians. This needs to be corrected for the master plan.

We want fulsome recognition that Tasmanian bushwalkers are traditional users, with deep interests in the area, unlike general tourists.

Ironically, there is inconsistent use of "visitor" – Foreword on p.v (2<sup>nd</sup> col., 1<sup>st</sup> para) it states "...TWWHA is socially and environmentally sustainable, both for visitors, but equally as important, for Tasmanians" ie the draft TMP has some recognition that Tasmanians aren't visitors in the same sense that people visiting the State are. The final TMP should simply say so by separating us from visitors by using a different term.

For the many Tasmanians connected to the TWWHA, we very strongly recommend a term for this. We suggest "Tasmanian Customary Activities". Alternatively it could be like "Tasmanians undertaking their customary activities". There may be more fluent terms, but **in no way do we accept the term "visitor"** for us. **It is wrong!** - both in fact and deed. Some of us are members of groups who have and care for huts in the TWWHA. When regularly weeding, maintaining a track or hut, passing on cultural ways and stories, it is incongruous to say the person is a "visitor", but an Aboriginal investigating or passing on some cultural ways is not a "visitor". As emphasised above we live here, co-own the area, care for it, it is a major part of our lives and recreation, and has deep meaning for many of us. We urge you to get this right. That the area is a WHA in no way excuses diminishing our customary or traditional relationship to the area.

The concentration on what “visitors” want in popular areas has led to ignoring the different needs of the Tasmanian customary activities cohort to the overseas visitor where the latter outnumber the Tasmanians (eg the banning of camping at Waterfall Valley, barring traditional walks in the Overland Track area while trying to please the “visitor”. This has led to the loss of tracks used only by Tasmanians with overgrowth when the tracks were tacitly forced to be much less visited.)

Section 7.12 *Protecting cultural heritage values* needs to add words to include the existence of more than Tasmanian Aboriginal (TA) culture alone; **non-TAs also have a cultural heritage**. (If we are here another 10,000 years, doing what we do now in TWWHA, do we say there is only one cultural association? No. As we have another culture associated with the TWWHA from before now, then that culture would be referred back to before now to sometime in the 1800s, and said to be over 10,000 years old! In contrast the DTMP directly implies one can't have two cultures or introduce / start a culture from 'European settlement'.)

We suggest something like: “A very significant heritage is Tasmanians being able to care for, walk in and enjoy the TWWHA, it is important to Tasmanians. Thus there is an ongoing need to ensure that Tasmanians are able to connect to country in this manner. This tradition extends to Tasmanians being able to walk as one chooses. In many popular areas Tasmanians are the minority, so risk displacement or loss of amenity. As a living culture, protection for this healthy way of life must be required when considering developments. RAAs need to give more weight to this heritage and protect non-TA customary activities.”

The Plan does not put any restrictions on the degree or number of developments beyond zoning constraints that are sometimes ‘stretched’ by Authorities, allowing ‘development creep’. The draft Plan recommends a few extra constraints that need not halt a project, but likely make it a little more sensitive to the locality and possibly more expensive. Where development is allowed by zoning or otherwise, it could be that most Tasmanians would most likely object to anything substantive as it would be incongruous with what is valued. While track upgrades (river-crossings, huts and campsites included) may be accepted for many areas, it is likely other changes would be strongly objected to. The same goes for anything that may adversely affect our amenity and access and increase cost to us.

Development proposals must have the consent of the Tasmanian public – a policy guideline needs say that before any development proceeds, it is to gain a distinct “public licence”.

We could agree to new sensitive commercial developments provided there is **no loss of amenity or access** to any area and the following conditions are met:

- Freedom and flexibility of access, no permission required
- No extra fees
- Day and overnight walks continue where they have been traditionally conducted or allowed
- No bookings for our walking, camping and other traditional use
- Two-way walking (direction of our choice)
- Traditional uses continue (camping, campfires (where allowed), groups use, fishing, etc.)
- No additional group restrictions to the maximum 13 for sensitive areas under PWS (we often elect to have fewer)
- All year around access
- Transparent process to ensure development is sensitive and appropriate, with built-in safeguards such as BWT or walking club representation on management bodies.

- Commercial interests must not be able to own, relatively exclusive use or exclusively lease land in the TWWHA\*.
- No significant commercial development outside of already recognised visitor services zones apart from possible track development^.
- Any developed tracks inside the TWWHA must also be available for public use.

\*Relatively exclusive use of a locality must be banned – we ask this be added into APG2.

The handing over of public land for private commercial development and the exclusion or limitation of Tasmanian walker access to such land because of the development is a matter of deep concern to us and the wider Tasmanian bushwalking community; it should not happen.

^Further significant commercial tourism infrastructure must be located outside the TWWHA. For example, walker huts higher or of larger area than the median Overland Track hut would be disallowed.

Standing camps should be very small, low key, blend into the environment (eg camouflaged, in a forest close) and genuinely temporary.

There are many manmade features, like ‘vernacular’ huts in the area that are enjoyed by Tasmanians. Many are relatively rustic / simple, but are part of the charm and enjoyment of the area for locals. This allows affordability for most Tasmanians. These manmade features should not fall prey to the wishes for ‘non-duplication’ in a locality (7.16) and subsequent compliance with the suggested “best practice” upgrades when there is to be other development in the vicinity. This would spoil the customary enjoyment that many seek, and in some cases could eradicate an activity (eg Mt Mawson downhill skiing).

In keeping with established local use, allow Tasmanian walking clubs and the like to have up to 13 for T4 tracks as agreed previously with PWS<sup>4</sup>. The Track Classification Scheme was agreed as flexible, eg party sizes are recommendations only. Our members know where numbers near the maximum won’t work, so place their own limits according to capacity of a location.

Helicopter flights for commercial recreational access should be banned.

## Summary

Add a condition to the TMP that access, affordability and amenity for Tasmanians must be preserved before any development is considered.

Any TASMANIAN OF WHATEVER ORIGIN with a connection to the TWWHA MUST BE considered more than a visitor – a CUSTOMARY ‘USER’. (We prefer a better term than ‘user’ as it ignores our care efforts in and for the TWWHA.)

We insist that at least Tasmanian bushwalkers are included as / in custodians.

Established manmade features and structures that Tasmanians enjoy should not fall prey to the wishes for ‘non-duplication’ in a locality (7.16) and compliance with the suggested “best practice” upgrades when there is to be other development in the area.

Development proposals must have the consent of the Tasmanian public

We want protection for Tasmanian bushwalker (traditional) use to be written into management plans (including tourism plans). This should include things like avoiding displacement of Tasmanians from our own tracks, huts, parks and reserves.

As the TWWHA belongs to **ALL** Tasmanians, management decisions must be made on the basis. Management of the TWWHA must be representative of all Tasmanians, and include bushwalkers who genuinely represent bushwalkers. Bushwalking Tasmania must be represented on the management committee for the TWWHA.

## APPENDICES

<sup>1</sup>The **Tasmanian bushwalker's connection to the TWWHA is very much cultural** – as agreed in a formal **document** between all parties to TWWHA (& WHACC) in 2001: "Many Tasmanian families have a number of generations who have enjoyed the TWWHA. Thus there is an unusually high proportion of Tasmanians who bushwalk — **it is a cultural activity**" and "This goal recognises the immense cultural importance of the WHA for the members of the large bushwalker community. It implies maintaining, as far as possible, their freedom, involvement with, and connection to, the landscape and recognises the importance of maintaining the level and types of use of the WHA by Tasmanian residents."

This was signed off (agreed to) **by both State and Federal Ministers**. This cultural association **differentiates the tradition from 'tourism'**.

The Abels Vol 1, Edition 2, pps 28 – 35 provides an idea of some of the more general values Tasmanian bushwalkers have for the TWWHA. Many of us have values that run much deeper than expressed in those pages. We can send further compelling information if requested.

<sup>2</sup> The UNESCO criteria 3 and 6 under which the TWWHA has been granted World Heritage status are:

3 -"to bear a unique or at least exceptional testimony to a **cultural tradition** or to a civilisation which is **living** or which has disappeared"

6 -"to be **directly** or tangibly **associated with** events or **living traditions**, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance."

For Tasmanians, bushwalking in Tasmania is a **living cultural tradition** (TAG 2001\*) and the TWWHA is **directly, and exceptionally, associated with the living tradition of Tasmanian bushwalking**. (The former Tasmanian Aboriginal culture is another cultural tradition.)

The Tasmanian bushwalker is certainly amongst those who are most immersed in the TWWHA and are far more likely and able to assist, or even lead, tourists to experience and be immersed in the TWWHA and enjoy our / the living culture of the TWWHA. The Tasmanian walker can be fitted into various walker-aligned definitions of pages 61 – 64; eg "Cultural Significance", "Country", "Intangible and Tangible Heritage Values".

<sup>3</sup>The definition of tourism must change to reflect our culture too. This to align with "cultural significance" (values) defined in the Burra Charter, which refers to aesthetic, historic, scientific, social or spiritual value for past, present or future generations. This includes Aboriginal and historic cultural values. While cultural values encompass social as well as recreational values, they are often separated to highlight this distinction. The fact that historic, scientific, social and recreational values are recognised as cultural values shows that not all cultural values are Aboriginal. Consequently, a recognition that Tasmanian Aboriginals are the custodians of the TWWHA is insufficient for an immersive experience of TWWHA cultural values by the visitor – there also needs to be a recognition that other groups are also custodians, and have a strong cultural connection.

Thus the term "visitor" is mal-applied - it downplays the fact that **both** Tasmanian walkers (and many other Tasmanians) and those with a Tasmanian Aboriginal forebear have a history of connections with the TWWHA that are a cultural connections. The area is part of our backyard, we own it, have stories about it, greatly value it and care for it.

#### **<sup>4</sup>Copy of agreed flexibility of Track Classification (TCS) with Parks**

Steven Sallans of PWS chaired the Bush & Track Review group (BATR) meetings that reviewed the TCS and some other TWWHA aspects. In particular, note the first dot point in the fax extract. Also, there can be more than one campsite in a location.

This item is included as over time such things may be forgotten, and some tend to rigorously use what was meant to only guide decisions and actions.

2003 15:10 FROM DTPHA

TO 62956666

P.02

From Steve Sallans 8/8/3.

ITEM 4

### **Final Issues for the Release Document**

Fellow BATRers,

Thanks everyone for your contributions and comments on finalising the Track Classifications. It is important that this issue be put to bed before the release of the public comment paper so as not to distract from the track management options. After considering everyone's viewpoints, I think that we are in fact closer to consensus than it might first appear.

The main issue appears to revolve around how the LAC will be interpreted once a track is given its initial classification. That is, when we initially decide that a track section will be T3, for instance, it will be the case that various segments will exceed the standards for a T3. These inherent breaches are demonstrated on the Dixon DNA charts. Indeed, the system as we have developed has provision for dealing with these initial discrepancies in a systematic way while maintaining the goal of stabilising the track and maintaining the present general level of use. What is required, however, is a set of procedures for managers to follow to ensure the rollout of the LAC system is consistent with BATR's aims, that is, the provision of a challenging walking experience, the stabilisation of the track system and minimum disruption to the walking community.

It should also be noted that the TC system also has considerable flexibility built in, for example:

- party sizes are "recommended" sizes only
- campsite specifications allow for, if required, "multiple campsites in suitable locations"
- and, more importantly, under the provision for *where red flag standards are breached already* (but the site is, or can be, stabilised) the site will be noted as "an acceptable variation"

Submitted on behalf of Bushwalking Tasmania,

Andrew Davey, President.