

# Draft Tourism Management Plan public consultation 2020

## Submission from Miranda Kellett and Distinguished Professor Jamie Kirkpatrick

### *About the submitters*

*Miranda Kellett:* I am a PhD candidate in Environmental Studies at the University of Tasmania and a 2020 recipient of the Sandy Duncanson Social Justice Bursary. I am a former Tasmanian State Service employee with experience in policy and program management and development. I am also a former employee of the Tasmanian Council of Social Service, where I advocated for those living on a low income and experiencing other structural disadvantage across public policy processes at all levels of government. My PhD research is investigating the management of tourism in protected areas for socio-ecological justice, focusing on Tasmania as a case study jurisdiction.

*Jamie Kirkpatrick:* I am an academic in the Discipline of Geography and Spatial Sciences at the University of Tasmania. I have been on committees advising governments and NGOs on management of protected areas since the early 1970s and have researched widely on the Tasmanian Wilderness World Heritage Area (TWWHA). Between 1987 and the end of last year I was continuously on advisory committees for the TWWHA and the State Parks and Wildlife Service (PWS).

Thank you for the opportunity to submit to the Draft Tourism Master Plan (TMP). We recognise the considerable amount of work, including public consultation, that has been undertaken by the contracted consultants ERA Planning and Environment and Cultural Heritage Management Australia, as well as staff within the Department of Primary Industries, Parks, Water and Environment (DPIPWE), in preparing the draft document. Below, please find our submission, which includes a summary of our recommendations, an outline of some of the main issues that we feel are inadequately addressed in the Draft TMP, as well as comments on specific sections. If the consultants or the Department would like to discuss our submission further, please feel free to contact us.

## Summary of recommendations

### **The purpose of World Heritage Areas**

- Remove the word 'balance' from the document and ensure the conservation of natural and cultural heritage values is prioritised and reflected in language.
- Adopt policy that requires a net benefit to OUVs to be demonstrated before any tourism venture or infrastructure is approved.

### **Addressing public concerns about tourism development and addressing Aboriginal joint management**

The submitters recommend that **finalisation of the TMP and the EOI process is suspended** until resolution of key strategic policy issues including:

- the review of the Aboriginal Heritage Act;
- review and public consultation on DPIPWE's Recreation Standards Framework, a document which is in draft format and is unpublished, but reportedly used to guide planning decisions

in relation to appropriate levels of visitation and infrastructure at different sites in parks and reserves;

- public policy review of the Reserve Activity Assessment framework, including consideration of its conversion to a statutory process with clear and transparent criteria for assessment and requirements for public consultation and its role in the wider natural resource management framework;
- finalisation of the air and boat access policies and agreements with further opportunities for public input;
- the development of policy related to tourist access to sites; and
- a review of the governance framework for the TWWHA, including actions to achieve Aboriginal joint management and control over actions affecting Aboriginal cultural heritage.
- expansion of membership of the National Parks and Wildlife Advisory Council to include social justice representatives, including those able to advocate for disabled, aged, those living on a low income and otherwise disadvantaged Tasmanians.

#### **Address local needs and relationships**

- Ensure all current and future pricing policies in the TWWHA enable all Tasmanians to have equitable access to the TWWHA regardless of income.
- undertake research to better understand the benefits of accessing parks and reserves for the Tasmanian public; barriers to access parks and reserves for the public; how commercial tourism activities impact local users, landowners and communities; and the 'ecosystem' services provided by the TWWHA, to feed into Reserve Activity Assessment and other policy processes that should be incorporating social, environmental and economic impact assessments.
- Ensure the disadvantaged are supported to have a voice in decision-making about visitor services and access and use rights in the TWWHA.

#### **Prioritising disability access**

- Incorporate disability access in the management and infrastructure priorities identified in the Draft TMP.
- Ensure people with disability and their advocates are supported to participate in decision-making about visitor services in the TWWHA.

#### **Information provision and compliance**

- Further discuss the need for information provision, education and compliance activity in relation to visitor services, particularly in languages appropriate to visitor profiles.
- Acknowledge the need for active management of licences and leases with commercial operators in the TWWHA, including active contract management and compliance enforcement.
- Ensure that commercial operators cover the costs of their own management through licence and contract fees, as well as compensating for exclusive use and access to public land.

#### **Strategic principles**

- Ensure the language of the TMP is consistent with the legislative framework.
- Do not permit tourist or visitor services unless there is a net benefit to the conservation of the OUVs.

### **Planning for the node hierarchy**

- Undertake research on Tasmanian's expectations about visitor management and crowding in different parts of the TWWHA.
- Include visitor caps and limits on commercial activities in management mechanisms and planning processes.
- Do not allow additional private infrastructure for commercial tourism purposes to be built within the TWWHA boundary.
- Further consider opportunities in the Western Tiers and the Huon Valley to become secondary visitor nodes for the TWWHA, with marketing and complementary visitor opportunities and PWS planning priorities undertaken in partnership with those communities.

### **Remote experiences**

- Include booking systems for Tasmania's remote area bushwalks to cap visitor numbers.
- Include recreational exclusion zones in areas of ecological or cultural sensitivity and rarity.

### **Social impact assessment**

- Ensure social impact assessment is based on research on values held by local people, acknowledge that assessment of values is subjective and provide greater clarity on social impacts will be assessed in decision making.

### **Bushfire management**

- Restrict new tourism accommodation infrastructure to outside the park and close to roads.

### **Noise pollution**

- Incorporate noise impact assessments on natural systems into the RAA, standards under which should be informed by independent (not conducted by proponents) research to understand impacts of types of noise pollution on natural systems in Tasmania-specific contexts.

### **Group numbers**

- Further policy consideration of issues related to group size.

## **Discussion**

### ***Apparent misunderstanding of the purpose of World Heritage Areas (WHAs)***

The purpose of WHA management is to ensure that outstanding universal values (OUVs) survive into the future. The TWWHA is a small part of the surface of terrestrial Earth, a planet on which the balance between economic development and conservation of natural and cultural heritage values is weighted heavily towards economic development. The TWWHA is one of the few places in which natural and cultural values are given strong legal protection through international treaty and national and state legislation.

The Tasmanian Government has adopted the position that Tasmania's parks and reserves should be 'unlocked' for tourism growth. While presentation of the TWWHA is an agreed purpose for WHAs

under the World Heritage Convention (WHC), presentation is not analogous to ‘tourism’. ‘Tourism’ implies a commercialised industry with a profit-making intention, in an economic system which prioritises ‘growth’. But tourism is not mentioned as a purpose of WHAs in the World Heritage Convention, nor of the TWWHA in federal or state legislation.

While presentation is a stated purpose, the WHC is clear that the OUVs of WHAs should be delivered to future generations in as good as or better condition as they are now. Therefore, no tourism activity should be permitted unless there is a net benefit to the conservation of OUVs.

This does not imply that the authors believe visitation should be discouraged or visitor services should not be provided, these are public lands. There are ways, however, in which sensitive tourism ventures, infrastructure and visitor services can assist in the rehabilitation of damaged areas, improve water quality or raise revenue for management, for example, delivering a net benefit to OUVs. But the language in the TMP states:

‘Achieving the balance between protecting and maintaining the OUV and the presentation of the TWWHA is critical to a successful and enduring outcome’...and...‘land managers aim to achieve a balance between the number of visitors who can come and enjoy an area without compromising the natural, social and cultural values of the place or the visitor experience itself.’

The language of ‘balance’ is not in keeping with the legislative framework and some of the tourism ventures recently approved by the State Government do not result in a net benefit to OUVs and damage access and experience for local people.

***Recommendations:***

- Remove the word ‘balance’ from the document and ensure the conservation of natural and cultural heritage values is prioritised and reflected in language.
- Adopt policy that requires a net benefit to OUVs to be demonstrated before any tourism venture or infrastructure is approved.

***Failure to address the concerns of the Tasmanian public about tourism growth in parks and reserves and failure to progress Aboriginal joint management***

Since the inception of its Expression of Interest (EOI) process, the Tasmanian Government has failed to address public concerns: about the impacts of recent and potential tourism growth in parks and reserves on local users, adjacent land owners and the environment; and the private enclosure of public land in parks and reserves. Many members of the public are also concerned that planning and licensing policies have been altered and may continue to be altered in favour of private interests without reference to good governance or protected area management principles.

The EOI process, and the lack of a transparent statutory development approvals process in Tasmania’s parks and reserves, has resulted in the approval of tourism projects without an adequate understanding, or appropriate consideration of, the impact of these projects on the environment, Aboriginal Cultural Heritage and the wider Tasmanian public.

The Tasmanian Government has also failed to progress establishing Aboriginal joint management of the TWWHA, a significant commitment of the 2016 TWWHA Management Plan. The TMP has been progressed without finalisation of the review of the Aboriginal Heritage Act, which at present does not provide adequate mechanisms for Aboriginal communities to control actions that affect Aboriginal cultural heritage. Furthermore, little progress appears to have been made in furthering the understanding of Aboriginal cultural heritage values within the TWWHA in recent years, despite

commitments to undertake a comprehensive survey. The authors support the recommendation in section 7.12 to require Aboriginal heritage assessments for every proposed development or infrastructure change. We recommend consideration of the effects of ongoing operations on access to country and meaningful control for Aboriginal communities over actions that affect cultural heritage as part of such assessments.

The Draft TMP fails to meaningfully address many of the specific concerns raised by people in public consultations relating to the details of managing the impacts of tourism in the TWWHA, including crowding and appropriate levels of infrastructure at primary nodes, displacement of visitors from crowded sites to places without infrastructure to cope, damage to fragile environments from remote recreation, concerns over increasing and inappropriate air and boat access to remote wilderness sites, how to maintain and improve experiences for Tasmanians and concerns over the scale, quality and type of tourism to be allowed in the TWWHA. Instead, the Draft TMP identifies, at the rear of the document, areas that require further policy development and strategic guidance (sections 6 and 7).

The concerns above have been raised consistently by Tasmanians since the present State Government's Expression of Interest (EOI) process began in 2014 and are the very reasons why the World Heritage Area Reactive Monitoring Mission called for the TMP to be developed during the drafting of the TWWHA Management Plan. The Draft TMP has failed to meaningfully address any of these issues. In its present form the Draft TMP is unlikely to obtain widespread support from the public, fill the policy gap in relation to tourism planning in the TWWHA or provide certainty to industry. The Draft TMP has been created prior to the review and resolution of other issues that require research, public consultation and policy direction from the State Government. How can the TMP provide meaningful strategic guidance on tourism in the TWWHA under these circumstances?

### ***Recommendations***

We recommend that **finalisation of the TMP and the EOI process is suspended** until resolution of key strategic policy issues including:

- the review of the Aboriginal Heritage Act;
- review and public consultation on DPIPWE's Recreation Standards Framework, a document which is in draft format and is unpublished, but reportedly used to guide planning decisions in relation to appropriate levels of visitation and infrastructure at different sites in parks and reserves;
- public policy review of the Reserve Activity Assessment framework, including consideration of its conversion to a statutory process with clear and transparent criteria for assessment and requirements for public consultation and its role in the wider natural resource management framework;
- finalisation of the air and boat access policies and agreements with further opportunities for public input;
- the development of policy related to tourist access to sites; and
- a review of the governance framework for the TWWHA, including actions to achieve Aboriginal joint management and control over actions affecting Aboriginal cultural heritage.
- expansion of membership of the National Parks and Wildlife Advisory Council to include social justice representatives, including those able to advocate for disabled, aged, those living on a low income and otherwise disadvantaged Tasmanians.

### ***Failure to address local needs***

The Plan fails to provide adequate attention to the needs of Tasmanian residents in determining management priorities and future opportunities in the TWWHA. The focus of future management priorities and ‘opportunities’ in the Draft TMP is clearly to enable growth in the commercial tourism industry catering to external visitors. It appears, however, that the TMP will also become the TWWHA’s main general visitor services management plan for the TWWHA by default, and that it will be the policy document through which government spending in relation to all visitation to the TWWHA will be prioritised. There is inadequate recognition of the TWWHA as public land with which the wider Tasmanian public has strong and enduring relationships. Despite objection from some local people during the public consultation process, the Department refers to all those accessing the TWWHA (with the exception of Tasmanian Aboriginal people) as ‘visitors’, and under existing policies Tasmanians are largely undifferentiated from any other ‘visitors’ from interstate or overseas.

The Draft TMP mentions, in passing, the recreational, social and health benefits of the TWWHA for Tasmanian people. What does DPIPW really know of these benefits, however, and what research has been done to understand Tasmanians’ relationships with these places and the foregone costs in other public services as a result? Where is the discussion of the socio-economic profile of Tasmanians and the responsibility of State Government to make the TWWHA accessible to all its citizens? Where is the consideration of social justice issues, such as the cost barriers to accessing the TWWHA, particularly its National Parks?

The Tasmanian reserved land estate includes approximately 42 per cent of the State’s terrestrial land mass. These places are of profound importance to many Tasmanians for family, recreational, spiritual and environmental reasons. Approximately half of Tasmanians, however, lack the literacy skills to meet the needs of everyday life, and more than a third of Tasmanians live on a low income (ABS 2013; DESSFB 2019; DSS 2019). While the wealthy and educated actively participate in public policy processes, the disadvantaged face significant barriers in doing so, from transport limitations in accessing public forums, to literacy limitations in participating in opportunities for written comment.

The State Government’s responsibilities include supporting disadvantaged communities and individuals to participate in policy processes, as they have a right to a voice in decision-making that will affect them. This responsibility has been recognised in other public policy processes in Australia, such as national consumer energy legislation reform. The authors urge the State Government and DPIPW to more actively consider how disadvantaged communities and individuals can be supported in participating in public policy processes. An opportunity to vote for a State Government representative once every four years, on all issues that may affect one’s life under State jurisdiction is insufficient for the effective functioning of a healthy democracy.

It is understood that the Tasmanian Government is intending to construct another iconic walk in the TWWHA in the Tyndall Ranges, following the success of the Three Capes Track. The cost of using the Three Capes Track prevents access by a large segment of the Tasmanian population. The Three Capes Track was built on public land with public funding, and yet many Tasmanians, approximately a third of whom relied on government transfer payments for survival prior to the covid-19 pandemic (DSS 2019), cannot hope to afford the minimum \$396 fee per person (the concession price). \$396 is 70 per cent of the Jobseeker allowance (prior to the temporary corona virus supplement) for a

fortnight and there is a wide literature<sup>1</sup> on the inability of people on government transfer payments, in particular the Jobseeker allowance and Disability Support Pension, to meet basic accommodation, food and healthcare costs, let alone fees to access public land. It is noted that walkers may camp on the track for free (aside from the cost of a National Parks Pass), but there is only one camping site on a track that takes fee-paying hut guests three nights to complete.

The authors understand that the Three Capes Track's pricing is not set at the cost to run the experience and keep it maintained, but at a level that the Tasmanian Government thinks the 'market' will pay. The walk has created a significant amount of revenue for PWS. Regarding the price of National Parks passes, why are Seniors, regardless of income, provided with a significantly greater concession on annual and two-year passes than others entitled to a concession?

There is ample opportunity to implement socially inclusive pricing policies in the TWWHA while maximising revenue making opportunities from organised and external 'tourism'. We hope that the exclusionary pricing policy of the Three Capes Track is not replicated in the TWWHA.

### ***Recommendations***

- Ensure all current and future pricing policies in the TWWHA enable all Tasmanians to have equitable access to the TWWHA regardless of income
- Undertake research to better understand the benefits of accessing parks and reserves for the Tasmanian public; barriers to access parks and reserves for the public; how commercial tourism activities impact local users, landowners and communities; and the 'ecosystem' services provided by the TWWHA, to feed into Reserve Activity Assessment and other policy processes that should be incorporating social, environmental and economic impact assessments.
- Ensure the disadvantaged are supported to have a voice in decision-making about visitor services and access and use rights in the TWWHA.

### ***Failure to address disability access as a mainstream issue***

Australia is a signatory to the United Nations Convention on the Rights of Persons with Disabilities, which requires state parties:

"To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas."<sup>2</sup>

Australia also has a National Disability Strategy (NDS) 2010-2020 developed through the Council of Australian Governments, the purposes of which include achieving improved performance of mainstream services in delivering outcomes for people with disability and to ensure disability issues

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<sup>1</sup> See for example the Australian Council of Social Service, 2012, 'Surviving, not living: Submission to Senate Employment Committee on the adequacy of 'allowance' payments', ACOSS Paper 192  
[https://www.acoss.org.au/images/uploads/Allowance\\_Adequacy\\_Submission\\_Final.pdf](https://www.acoss.org.au/images/uploads/Allowance_Adequacy_Submission_Final.pdf).

<sup>2</sup> <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-9-accessibility.html>

are included in the development and implementation of all public policy that impacts on people with disability.

The Tasmanian Government has a clear responsibility to ensure that the needs of people with disabilities are considered in all mainstream policy and planning processes. It is extremely disappointing to see this issue largely forgotten in the Draft TMP, and not identified as a funding and policy priority.

The Tasmanian Government has an Accessible Island Disability Framework for Action 2018-2021 and DPIPWE notes in its 2018-21 Action Plan that there is no current and comprehensive information available to people with disabilities about the accessibility of the reserved land estate. Furthermore, recent documents completed by the PWS, including its own Visitor Guide in 2018, does not include information for people with disabilities. In the context of the Draft TMP, the needs of people with disabilities and people with mobility limitations, including the aged, are mentioned only in passing.

As a minimum, the Tasmanian Government should ensure that information for people with disability is updated and included in all visitor information as a priority, that disability access is incorporated into all infrastructure planned for visitor services zones in the TWWHA, and that a range of accessible experiences are available to disabled people in each local government area adjacent to the TWWHA. Many people with disabilities rely on government transfer payments to survive, and face difficulties not only in physical access but also financial and transportation limitations. It is not possible for many individuals with disabilities to travel long distances. All people in Tasmania should be provided with the opportunity to enjoy the mainstream services available to others, including the TWWHA.

A love of the natural world and appreciation of its richness and variety is not confined to the able bodied. The Draft TMP acknowledges the strong social and health benefits that access to the TWWHA gives to people and failing to provide these benefits to the thousands of Tasmanians who live with disability and mobility limitations, is an abject failure of public policy. It also demonstrates the lack of understanding and research that has gone into understanding the social and health benefits of parks and reserves.

While we note that some public toilets and tracks have been upgraded for disability access in recent years, it seems clear that the needs of people with disability continue to be forgotten in mainstream policy processes in Tasmania and little progress appears to have been made in meeting our obligations under the UN Convention.

### ***Recommendations***

- Incorporate disability access in the management and infrastructure priorities identified in the Draft TMP
- Ensure people with disability and their advocates are supported to participate in decision-making about visitor services in the TWWHA

### ***Failure to discuss need for information provision and compliance***

While it is recognised that the tourism industry would like to take a positive, aspirational approach to tourism opportunities in the TWWHA, the Tasmanian Government has responsibilities beyond industry growth in managing visitors in the TWWHA. The Draft TMP includes very little discussion of the need to actively manage licensing and contracting of private commercial activity in the TWWHA, as well as the need for information provision and compliance activity aimed at visitor and commercial operator behaviour. Inappropriate tourist interaction with wildlife and vegetation,



littering and failure to follow signage direction excluding people from sensitive or rehabilitating areas is common in the TWWHA, and there is little information provided to visitors in appropriate languages advising of expected behaviours and the consequences of failures to comply. Nor does there appear to be much capacity or support for PWS staff to undertake compliance activity, given staff resourcing.

Many other jurisdictions, such as New Zealand and the United States, actively promote the expected behaviour of visitors in parks and reserves as part of their visitor management policies. In New Zealand this is done in partnership with private enterprise, including Air New Zealand. Tasmania has a need to better communicate with visitors about the rules and responsibilities when visiting reserves. The need for better information provision also applies to the condition of tracks and dangers likely to be encountered. The Cradle Plateau, for example, is well known for its ability to strand unprepared visitors in bad weather.

Furthermore, there is a need to actively monitor commercial tourism providers operating in the TWWHA. Given many of these businesses are provided with effective monopoly arrangements on public land for extended periods of time, PWS needs to be resourced to undertake effective contract management, and conduct regulatory compliance activities, to ensure high standards of presentation, that visitor services are maintained and that operators ensure customers comply with expected rules of behaviour.

Failure to adequately manage contracts with commercial operators has resulted in substandard services and infrastructure maintenance in parks and reserves in Tasmania in the past. Private operators seeking leases and licences to operate in the TWWHA should be required to pay fees at a level that ensures that the PWS is adequately resourced to manage these relationships and the public is compensated for private use of public land. Future licences and contracts should be reviewed to ensure the State Government has the power to revoke licences and leases if businesses fail to comply with any requirement under contract or regulation, that penalties can be imposed, and that arrangements are regularly reviewed to ensure services and infrastructure standards continue to meet public expectations.

### ***Recommendations***

- Further discuss the need for information provision, education and compliance activity in relation to visitor services, particularly in languages appropriate to visitor profiles.
- Acknowledge the need for active management of licences and leases with commercial operators in the TWWHA, including active contract management and compliance enforcement.
- Ensure that commercial operators cover the costs of their own management through licence and contract fees, as well as compensating for exclusive use and access to public land.

**Below please find comments on specific sections of the DRAFT TMP**

## ***Section 2 Strategic Framework***

### **2.2 The strategic principles**

It is concerning to see the Draft TMP present a list of strategic principles which imply that 'authentic experiences' and 'valuing the role of tourism' is equally important as protecting and maintaining the OUV of the TWWHA. As discussed above, while the Draft TMP is not a statutory document, it should at least be consistent with the overarching legislative framework at international, national and state

levels, which prioritise the protection of OUV and natural and cultural values, while enabling presentation of the property, and recreational access, in a manner consistent with the protection of those values.

### ***Recommendations***

- Ensure the language of the TMP is consistent with the legislative framework.
- Do not permit tourist or visitor services or infrastructure unless there is a net benefit to the conservation of the OUVs.

## ***Section 3 – Planning Priorities***

### **3.4 Planning priorities for the node hierarchy**

The discussion of planning priorities for both Cradle Mountain and Mount Field should consider carrying capacity and limitations on visitor numbers, through restrictions on commercial activity, such as coach tours and cruise ship visits. While the Draft TMP indicates that visitor number limitations will not be considered in isolation from other management tools, it should be one of the options.

Constantly adding infrastructure to cater for larger numbers of visitors fundamentally alters the experience of visiting these places, as is acknowledged in the document, and at a certain point, crowding and loss of natural environment and experience will occur regardless. Planning based on 'expected and projected visitation' implies no end to visitor growth and an unwillingness to prevent the loss of these special places and experiences. Unfettered visitor growth will result in the 'piracy' of these places from local people, which has already occurred to some extent at Cradle Mountain and Freycinet. Visitor caps should be based on research on the level of crowding that is acceptable to the Tasmanian community, as the public owners of the TWWHA, rather than the industry, or external visitors who are transitory and do not have to live with the wider costs of 'tourism' in these special places. Few studies on sense of crowding at tourist sites identify if respondents are visitors from outside local areas or jurisdictions, and there is limited research of local attitudes towards tourism in parks and reserves in Tasmania.

While not specifically addressed in the Draft TMP, the authors would like to raise concerns about future development of private infrastructure, particularly for accommodation services, within the TWWHA. On a first principles basis, private enclosure of public land should not be encouraged. Any private commercial accommodation infrastructure should be built outside the boundary of the TWWHA, on private land. Proposals for private buildings for commercial tourism purposes in remote wilderness locations, in particular, should be discouraged, as this kind of infrastructure results in an inequitable experience of public lands, favouring the wealthy, alters the remote wilderness character of the area, impacts on the visual amenity, and causes further disruption to local ecology and Aboriginal cultural heritage. While there are some existing sites where private infrastructure has been allowed on public land, such as at Lake St Clair, and on the Overland and Three Capes Tracks, there is no need to proliferate such sites.

Regarding the capacity of tourism to the TWWHA to support regional communities, the authors note that the potential of the Western Tiers area as a secondary visitor node, and potential visitor information hub site, is underemphasised. With close proximity to Mole Creek Caves, a gateway to Cradle Mountain, and numerous day walks along the Western Tiers and Mount Roland, Deloraine, Mole Creek, Sheffield and surrounding communities are well placed to provide visitor accommodation, food, fuel and complementary visitor experiences for mainland visitors seeking a

longer stay in Tasmania. The Huon Valley in the South is another potential node. Integrated planning between PWS, and some additional visitor infrastructure, could see the Western Tiers' proximity to the TWWHA become a greater asset to its tourist industry.

### ***Recommendations***

- Undertake research on Tasmanian's expectations about visitor management and crowding in different parts of the TWWHA
- Include visitor caps and limits on commercial activities in management mechanisms and planning processes
- Do not allow additional private infrastructure for commercial tourism purposes to be built within the TWWHA boundary.
- Further consider opportunities in the Western Tiers and the Huon Valley to become secondary visitor nodes for the TWWHA, with marketing and complementary visitor opportunities and PWS planning priorities undertaken in partnership with those communities.

### **3.8 Remote Experiences**

The discussion about remote experiences in the Draft TMP does not include an acknowledgement of the existing and cumulative impact of remote area bushwalking on sensitive alpine environments. While the authors recognise the strong desires of recreational users to maintain the spontaneity of their experiences in remote areas, there are specific walks, such as Frenchman's Cap and the Walls of Jerusalem, where visitor numbers have grown significantly and are now resulting in crowding, ecological damage and an alteration of experience in these places, resulting in the need to build more infrastructure. Crowding at camping sites and huts on these walks frequently causes people to camp away from designated sites, creating further ecological damage in sensitive environments. More challenging walks such as the Western Arthurs also exhibit significant cumulative environmental damage from generations of Tasmanian bushwalkers, despite relatively low visitor numbers, due to the sensitivity of vegetation and soils to trampling.

Despite the acknowledgement in the Draft TMP that we should not be promoting these places to the external tourism market, with respect, this is not something PWS can control. The 'Instagram effect' can cause rapid shifts in consumer behaviour. The authors urge PWS to implement a booking system on Tasmania's busiest remote area walks, which could include quotas for residents to preserve spontaneity of experience and a maximum number of visitors to ensure crowding does not occur and vegetation damage is prevented. Given the limited capacity of these walks, and the sensitivity of the environment, commercial tourism operators should be discouraged.

Furthermore, there are illegally constructed walking tracks in Tasmania's remote areas, and off-track trips to all of Tasmania's mountain ranges are common amongst the local bushwalking community. PWS should reconsider if a greater number of places should be excluded from recreational access to preserve the ecological functioning of particularly sensitive or rare flora and fauna communities.

### ***Recommendations***

- Include booking systems for Tasmania's remote area bushwalks to cap visitor numbers.
- Include recreational exclusion zones in areas of ecological or cultural sensitivity and rarity.

## **Section 7 – Assessment Guidelines**

### **7.2 Social and economic considerations**

The authors are concerned with the reliance on a Cost Benefit Assessment (CBA) to assess the social and economic impacts of a tourism proposal. There is an established literature demonstrating the significant shortcomings inherent in using CBAs to meaningfully assess social and environmental impacts.<sup>3</sup> The valuation of social and environmental goods is highly subjective and open to manipulation and in many cases seeks to place dollar values on qualities of life and the physical world that many people believe should not be commodified. Furthermore, it is concerning to see that the Draft TMP states that “Social costs can be managed to help minimise the effects that tourism can have” on communities, without acknowledgement that tourism ventures should not be approved if social costs are deemed to be too high. While page 77 discusses the need for social impact assessments in addition to CBAs – how are these two processes to be evaluated against each other or incorporated, given CBAs should already incorporate as a minimum a triple-bottom line approach?

#### **Recommendation**

- Ensure social impact assessment is based on research on values held by local people, acknowledge that assessment of values is subjective and provide greater clarity on how social impacts will be assessed in decision making.

### **7.4 Bushfire Management**

As acknowledged in the Draft TMP, the TWWHA is increasingly vulnerable to bushfire:

If the current trend of landscape-scale fires of increasing frequency and intensity continues, catastrophic damage to some of the property’s key attributes (ancient landforms, beautiful endemic species, alpine vegetation, cultural sites) is inevitable; since 2000, ‘landscape-scale’ wildfires have burnt just over 10 per cent of the TWWHA (International Union for Conservation of Nature, 2019).

While we do not agree that such damage is inevitable, its prevention requires substantial investment in the people and equipment necessary for remote firefighting. The potential presence of tourism accommodation infrastructure in remote areas is likely to divert fire fighters away from protecting the fire-sensitive natural assets, such as the native pine forests and alpine vegetation, that have outstanding universal value. The compulsory mechanical fuel reduction around such infrastructure will have a direct impact on natural values

#### **Recommendation**

- Restrict new tourism accommodation infrastructure to outside the park and close to roads.

### **7.6 Noise pollution**

This section does not clearly acknowledge the considerable impact that noise pollution has on natural systems and wildlife. There is an established literature (Barber 2010; Blickley 2010) showing the impact on wildlife health and behaviour as a result of noise and this impact should be

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<sup>3</sup> See for example B. E. Harcourt, ‘The systems fallacy: A genealogy and critique of public policy and cost-benefit analysis’, *Journal of Legal Studies*, 42(2): 419-447.

understood before allowing infrastructure, flight or boat access or commercial tourism operations, as indicated on page 79.

#### **Recommendation**

- Incorporate noise impact assessments on natural systems into the RAA, standards under which should be informed by independent (not conducted by proponents) research to understand impacts of types of noise pollution on natural systems in Tasmania-specific contexts.

### **7.7 Group Numbers**

While this section acknowledges the social and environmental impact of groups of visitors, there is no discussion about licensing arrangements for commercial tourism operators and whether maximum group numbers should be enforced at some sites and tracks, and commercial operation prohibited in some places, or what a reasonable mix of organised tourism activity as opposed to independent visitation should be at particular sites.

#### **Recommendation**

- Further policy consideration of issues related to group size.

### **References**

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