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**Tourism Master Plan
for the Tasmanian Wilderness World Heritage Area (TWWHA)
Draft for public comment 19 March 2020**

In an earlier submission, dated 10 July 2019, I expressed concern with the process adopted for the development of the *Tourism Master Plan for the TWWHA*.

Over the years I have served on several government advisory committees associated with the development and management of the State's National Parks and Reserves. Prior to the establishment of the TWWHA I was directly involved in the establishment and operation of a Tasmanian nature-based tourism business that was featured by the Australian Tourism Commission.

The Scope of Works for the development of this Tourism Master Plan (TMP) clearly provides emphasis towards expanded growth in tourism within the World Heritage property, particularly Visitor Services Zones and Recreation Zones as identified in the *TWWHA Management Plan 2016*. These Zones provide for a wide range of tourism related experiences and any proposed development must ensure that **all such experiences by users are not seriously degraded**.

Recently I was invited to comment on a proposal for Lake Rodway by the Tasmanian Walking Company as part of the EOI process. This is an example of an inappropriate development in a highly sensitive area, that would place additional pressure on a small local area, thus reducing the experience by those who currently visit the area and the existing Scott-Kilvert Hut. Comfortable accommodation for bushwalkers is already provided at this hut, built by voluntary labour as a memorial in reverence to Ewan Scott and David Kilvert.

No such developments should be allowed in this Lake Rodway area and certainly there needs to be a curb on any new structures built for the benefit of commercial enterprises within the TWWHA. All such facilities should be outside the boundaries of the TWWHA, irrespective of zoning.

With the present effects of COVID19, where there is a cessation of international tourists, with only limited visits by locals, it is indeed timely to re-assess the role of public and/or commercial facilities within the TWWHA. There should no longer be plans to cater for greater and greater numbers of visitors, rather to call a halt and upgrade and improve the public facilities that already exist, thus maintaining, not degrading the experiences, for those who visit the TWWHA.

The Government had rendered the process meaningless by preempting the development of the TMP by approving several commercial developments within the TWWHA before launching the appeal calling for the public to develop this Plan.

As well as providing systematic in-principle support for leases and licences granted for a number of proposed developments within the TWWHA, the development of the TMP had commenced before

the completion of the assessment of Aboriginal heritage values within the TWWHA and before the revision has been completed for the Reserve Activity Assessment Process (RAA) that governs the assessment of proposals for developments in the State's reserves, including the TWWHA.

The process, should as the primary goal of the TMP, uphold the principal for the protection of the TWWHA's Outstanding Universal Values which includes Aboriginal heritage values.

There is a lack of transparency on a number of tourism development proposals that have already been approved in the TWWHA and public input has neither been sought, nor where public input has been provided, their concerns have not been heeded.

My earlier submission to the TMP was restricted to aspects of the final *TWWHA Management Plan 2016* where it related to the Recreation Zone of the Bond Bay/Payne Bay, Port Davey precinct as indicated Map 17 on page 199 of the *TWWHA Management Plan 2016*. Further to these concerns, the requirement for input from the Tasmanian Aboriginal Community as per IUCN (40 COM 7B. 66), it seems that the recommendations I made in my submission dated 13 March 2015 were overlooked to the *TWWHA Draft Management Plan 2014*.¹ There was a need for effective strategies to prevent any threats that could damage the petroglyphs in this area. Included in this submission 7498 specific attention was drawn to the section of shoreline that bordered the Bond Bay Aboriginal rock art site in Payne Bay within Port Davey, which was shown in yellow in the *TWWHA Draft Management Plan 2014* that signalling this was a recreation/tourism zone.

These Bond Bay Aboriginal rock art sites, being recognised for their rarity, fall within this recreation/tourism zone and should have been actioned for protection by zoning 'wilderness', green.

To enable basic protection of these Bond Bay sites, visitors arriving by commercial operators or from motorised vessels, including float planes and yachts should be discouraged from landing on the coast between a point north of Curtis Point in a southerly direction to Whalers Point, Bond Bay/Payne Bay (Port Davey). This was indicated on page 14 of my submission 7498.² Ideally, had my submission 7498 been read and actioned, this section of shoreline would not have ended up as yellow in the final *TWWHA Management Plan 2016* which would have effectively excluded this sensitive section of shoreline for recreation/tourism activities.

Not only was this recommendation in my submission 7498 (Sims 2015) made to the *TWWHA Draft Management Plan 2014* ignored in the final *TWWHA Management Plan 2016*, but neither this submission, nor my published work, including a monograph on the Bond Bay site (copy provided to ERA Planning 2/7/2019)³, nor my on-line publication *No Reprieve for Tasmanian Rock Art*⁴, were cited in the DPIPWE 2017 *Aboriginal Heritage of the Tasmanian Wilderness World Heritage Area (TWWHA) A literature review and synthesis report*. All of these publications made specific reference to the Bond Bay petroglyph sites within the TWWHA.

The only work of mine that was cited in this synthesis report (DPIPWE 2017) was a reference to the Bond Bay site in an earlier 1977 publication.⁵ The Bond Bay sites have been and are at risk and it's far too late to simply just *monitor* any impacts to these rare Aboriginal cultural sites as restrictions and basic guidelines should be included for all potential users of this area.

In the 2020 TMP draft the only section that deals with Port Davey/Bond Bay is under the heading Melaleuca on page 24. "*boat use and access strategy in conjunction with the site plan, harbour and river access, to address both landings and a mooring system..*" It is this 'boat use and access' strategy that needs to include my concerns as previously expressed.

¹ Copy of EXTRACT: Sims. 13 March 2015. Submission No. 7498 , to DPIPWE on the TWWHA 2014 DRAFT, that was sent to ERA Planning 2/7/19.

² *ibid.*

³ Sims 2014. *Tasmanian Aboriginal Rock Art - Bond Bay Site*. ISBN 9780908010080

⁴ Sims, Peter C. 2013. *No Reprieve for Tasmanian Rock Art* (MDPI) Switzerland <https://www.mdpi.com/2076-0752/2/4/182>

⁵ Sims, P.C. Variation in Tasmanian Petroglyphs. In *Form in Indigenous Art: Schematisation in the Art of Aboriginal Australia and Prehistoric Europe*; Ucko, P.J., Ed.; Australian Institute of Aboriginal Studies: Canberra, Australia, 1977; pp. 429–438.

Cradle Valley and Overland Track

I note in the TMP on page 20, **Cradle Valley**: “*Additionally, to support the master plan, an updated visitor node plan to replace the Pencil Pine-Cradle Valley: Visitor Services Zone Plan 2006 should be progressed.*” Just how far has this revised 2006 VSZ Plan progressed? I presume none, as I am unaware of any recent request for input into this Plan. For the final TWWHA TMP to be relevant, it should include an updated Plan for the Pencil Pine - Cradle Valley.

According to the Map on page 79 of the *TWWHA Management Plan 2016*, the Lake Rodway area is excluded from the VSZ and seems to be included as part of the Overland Track as a Recreation Zone. This map is obscure as to the exact boundaries of the Recreation Zone and the adjoining Wilderness Zone. The location of the existing Lake Roadway/Scott-Kilvert Memorial hut and the location for the proposed Tasmanian Walking Company’s (TWC) commercial tourism development should be excluded from the Recreation Zone and included as part of the Wilderness Zone.

If this TWC proposed development falls within the Wilderness Zone, then those conditions should apply. Lake Rodway and the TWC proposal is in the Recreation Zone, then any revised conditions applicable that are based on an updated and revised *Overland Track Management Plan 2006* should apply. The *TWWHA Management Plan 2016*, page 138, indicates that the *Overland Track Management Plan 2006 needs to be revised and finalised*.

The TWWHA Plan 2016 section 3.1.1.2 indicates one of the aims of the Recreation Zone is to: ... ‘*enable relatively high levels of active day and overnight recreation, without significant impact on natural or cultural values.*’ In my opinion the TWC proposal at Lake Rodway would have a significant impact on the natural and cultural values of the area.

Let’s not in an endeavour to toady up to tourist developers, which can result; either, a degraded experience for the users, and/or, the impact or loss of irreplaceable natural and cultural values of the TWWHA.

I note that: “*After the public submission period a final TMP will be prepared. Feedback from the public submissions on the draft TMP will be considered in the preparation of the final TMP. Key issues raised through the public submissions will be summarised and released.*” I therefore look forward to receipt of this summary of public submissions.

I thank you for the opportunity to present my views and it is pleasing to see the incorporation of sections based on input from the Tasmanian Aboriginal community.

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