

**Submission on the**  
**Draft Tasmanian Wilderness World Heritage Area Tourism Master Plan**

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**About the author**

I am one of Australia's leading authorities on wilderness, having researched and written on the subject for over 40 years. I also have extensive first-hand knowledge of the Tasmanian Wilderness, having worked and bushwalked in the region for 50 years. I prepared the map of the wilderness values of the Tasmanian Wilderness World Heritage Area (TWWHA) that appears in the TWWHA Management Plan (2016), and I was called by the Environmental Defenders Office as an expert witness on the wilderness impacts of the proposed Lake Malbena development. My book *Refining the definition of wilderness*, co-authored with Grant Dixon and Chris Bell, was published in August 2018.

**About this submission**

I will confine my comments to section 1.3 of the Draft Tourism Master Plan (DTMP), which relates to its scope; section 7.15, which relates to the protection of the wilderness values of the TWWHA; and section 7.14, which relates to cumulative impacts.

**Scope of the Tourism Master Plan (section 1.3)**

The DTMP states that the TMP:

*provides additional guidance, context and policy direction for tourism in the TWWHA, increasing clarity and certainty for government, industry and the community;*

*provides a strategic approach to achieving best practice, sustainable management of visitation in the TWWHA through delivery of public infrastructure;*

Contrary to the foregoing statements, and as noted below, as far as wilderness protection is concerned the DTMP provides neither 'additional guidance' as to how wilderness values will be protected, not a strategic approach for ensuring that they will be protected.

**Protection of wilderness values (7.15)**

The DTMP states:

*The IUCN describes the primary objective of wilderness as to protect the long-term ecological integrity of natural areas that are undisturbed by significant human activity, free of modern infrastructure and where natural forces and processes predominate, so that current and future generations have the opportunity to experience such areas. Other objectives include to enable indigenous communities to maintain their traditional lifestyles, to protect their cultural and spiritual values and to allow for low-impact research activities.*

The statement cited here by IUCN relates to designated Category Ib (wilderness) areas. At present, none of the TWWHA has this designation.

The DTMP does not make it clear how the quoted statement relates to the wilderness areas of the TWWHA. If wilderness areas are to be 'free of modern infrastructure', this would appear to rule out the kinds of developments that are currently being proposed in areas like Lake Malbena and the South Coast Track.

The following paragraph in section 7.15 states:

*Under the Management Plan, wilderness values will be protected by restricting built infrastructure and mechanised access, in particular by the inclusion of 82 per cent of the area in the restrictive Wilderness Zone, and, as with cumulative impact, potential impacts on wilderness values within the TWWHA must be understood in the context of the Management Plan zoning, having regard to the aims and objectives of adjacent zones.*

Notwithstanding that 82 per cent of the TWWHA is within the WZ, the WZ does not contain all the wilderness areas of the TWWHA, and the boundaries of the WZ are not sufficient to protect all the wilderness within it. High- and medium-quality wilderness lies outside the WZ in several areas, particularly on the Central Plateau and in the RZ bordering the South Coast Track. High- and medium-quality wilderness within the WZ is potentially threatened by developments in the same areas, in the vicinity of the Lower Gordon, in the Port Davey hinterland, and elsewhere.

The suggestion that built infrastructure and mechanised access will be restricted sufficiently to protect wilderness values is clearly false, as the Lake Malbena proposal unequivocally proves (Hawes 2018). Developments that the Tasmanian government is currently considering, and that the DTMP evidently approves, such as the construction of walkers' lodges on the South Coast Track, would have a major negative impact on wilderness values in both the WZ and adjacent zones.

The DTMP goes on to state:

*The Management Plan requires that impacts on wilderness quality and wilderness values are considered in any assessment of activities in the TWWHA.*

While it is desirable and indeed essential that such consideration occurs, this statement provides no assurance that it will result in wilderness quality and wilderness values being protected.

Further on in section 7.15 the DTMP states:

*The Management Plan identifies under KDO 8.5 that impacts on wilderness values are considered in any assessment of activities. However, as a high level strategic planning document, it does not provide guidance as to when an impact on wilderness quality or wilderness values is acceptable or otherwise, or any details of how and when a wilderness quality assessment should be undertaken.*

If a 'high level strategic planning document' like the Management Plan does not provide such guidance or details, what will? Section 1.3. of the DTMP claims that the purpose of the TMP is to provide such guidance or details. Yet it fails to provide them, fails to suggest how such guidance or details might be developed, and fails to provide any assurance that they will be developed.

The DTMP states:

*While it is recognised that the current wilderness assessment methodology could be refined (for example, currently the wilderness assessment does not distinguish between the impact of a single hut or a cluster of huts on apparent naturalness), it is beyond the scope of the Tourism Master Plan to make recommendations in relation to a more appropriate methodology.*

The statement that recommendations in relation to a more appropriate methodology are beyond the scope of the Tourism Master Plan is so obvious as to be barely worth stating. It is also beside the point. The crucial point is that the DTMP stops short of saying that the methodology *should* be refined, let alone that it *will* be, and it provides no strategy or guidelines for ensuring that such refinement is undertaken.

The DTMP continues:

*...it is critical that the methodology, or any future methodology, is applied to all development and works in the TWWHA regardless of the location, the type of development, or the proponent (whether PWS, a private operator or a community group). Until such time as the methodology is sufficiently revised, it will be necessary for the PWS to use this tool to make decisions about the potential gain or loss from each development and to weigh that up against the values protected by the action or the public benefit realised by the development (e.g. track hardening or toilets to minimise environmental harm).*

While it is clearly desirable and indeed essential that wilderness impacts be assessed for all such developments, in the absence of the 'guidance and details' referred to previously, such assessment will be frankly pointless.

The statement that 'the potential gain or loss from each development will be *weighed against* the values protected by the action or the public benefit realised by the development' (my emphasis) implies the possibility, indeed the likelihood, that wilderness values will *not* be protected, but that in some and quite possibly most circumstances they will be sacrificed for the supposed 'public benefits' of development.

It is precisely this kind of ongoing trade-off of wilderness values to 'development' that has resulted, and will continue to result, in the incremental loss of wilderness values warned of in 7.14 (see below).

Citing 'track hardening' and 'toilets' as examples of the kinds of developments against which wilderness values need to be weighed is misleading and extremely disingenuous. These are clearly not the kinds of developments that pose the greatest risk to wilderness, and that the Tasmanian government and the tourism industry are clamouring to promote. By far the greatest risk to wilderness is from tourism developments like those proposed at Lake Malbena and along the South Coast, which have no justification in terms of environmental protection, and which will benefit primarily commercial interests.

## Cumulative impact (7.14)

The DTMP expresses concern about cumulative impact but offers no means for preventing it.

In section 7.14 it states:

*The need to find the balance between successfully managing the cumulative impacts of growth and offering a range of experiences to meet visitor needs and expectations, while not negatively impacting the OUV, is a key outcome for the Tourism Master Plan. Cumulative impact over time from activities assessed on a case-by-case basis is a key risk to the OUV.*

It is literally meaningless to talk about ‘managing’ cumulative impacts unless there is a clear commitment to setting limits. The DTMP offers no means for determining what level of cumulative impact may or may not be acceptable, and no means for preventing ongoing cumulative loss to the TWWHA’s OUV, and specifically to wilderness.

It states:

*It is recognised that there is no single, accepted cumulative impact assessment methodology (International Finance Corporation, 2019), and given the unique characteristics and values of the TWWHA, it is appropriate that a tailored methodology is identified.*

It is clearly desirable that such a methodology be identified, or, if no such methodology is currently available, that it be developed. However, the DTMP provides no guidance as to how such a methodology is to be identified or developed, no assurance that this will occur, and, in the event that a methodology is identified or developed, no assurance that it will be systematically and effectively applied.

On the contrary, the DTMP states:

*Consequently, it is considered that the cumulative impact considerations and ongoing management of cumulative impact are primarily the role of PWS as the managing authority.*

This statement makes it clear that the DTMP has *no intention* of setting limits to cumulative impacts, and *no intention* of providing guidelines as to how such limits should be set. It is an unequivocal admission that as far as the prevention of cumulative impacts is concerned, particularly impacts to wilderness, the DTMP is *valueless*.

## Reference

Hawes, M. 2018. Lake Malbena wilderness assessment. November. <https://tnpa.org.au/wp-content/uploads/2018/12/Assessment-of-potential-wilderness-impacts-at-Lk-Malbena-Hawes-2018.pdf>. Retrieved 23/6/20.