

Dear Project Manager.

Thank you for the opportunity to make a submission on the draft Tourism Management Plan (TMP).

I understand that the draft TMP has been developed following the 2015 request (and subsequent 2018 reminder) from the World Heritage Committee 'to expedite the development of the Tourism Master Plan in order to ensure a strategic approach to tourism development within the property, in line with the primary goal of protecting its Outstanding Universal Value (OUV), and to submit the draft Tourism Master Plan to the World Heritage Centre for review by the Advisory Bodies prior to its finalization'

The stated vision of the TWWHA Management Plan 2016 and this draft TMP is: "To identify, protect, conserve, present and, if appropriate, to rehabilitate the World Heritage, National Heritage and other natural and cultural values of the TWWHA and to transmit that heritage to future generations in as good or better condition than at present."

This vision statement is at odds with the scope of the draft TMP that includes identifying: "...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. "

The draft TMP should not "prioritise investment" for tourism developers to profit from the TWWHA. To do so risks our obligation to "transmit that heritage to future generations in as good or better condition than at present."

The draft TMP is not in line with the primary goal of protecting the OUV of the TWWHA. It appears to be lacking in any clear direction and guidance on specific issues that have led to community backlash against recently proposed commercial tourism developments.

For example, the proposed Lake Malbena helicopter accessed huts have controversially passed through the non-statutory Reserve Activity Assessment process on the basis that they comply with the PWS Standing Camp Policy. This compliance seems stretched given the luxury huts (steel framed, chemset into the bedrock, clad in fiberglass reinforced plastic with glazed windows and timber decks) met its definition of a "standing camp" which requires accommodation to be "temporary appearance.....made of mostly tent style material"

One would hope that this draft TMP would provide guidance for tourism developers around these huts and standing camps. In fact, the scope promises to: "provide additional guidance,

context and policy direction for tourism in the TWWHA, increasing clarity and certainty for government, industry and the community “

With this promise I read section 7.9 Visitor accommodation, huts and camping and was shocked by the total lack of guidance. Unfortunately, the draft TMP states in section 7.9:

“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.”

We, the public are left wondering where this guidance will come from, if not from this draft Tourism Management Plan.

This lack of guidance is evident in numerous other sections. Section 7.10 refers to the need for criteria in construction without defining them. Section 7.6 refers to the “vexed question” around noise pollution without any attempt to provide answers. The table of Assessment Policy Guidelines in 7.17 is full of vague terms such as “appropriate use”, “consideration should be given” or the promise to produce further documentation at some point in the future. I have rarely read so many words that have said so little.

I can only assume that there is some reluctance on the part of DPIWE to produce this Tourism Master Plan given the 5 years it had taken. The lack of guidance in this draft seems to deliberately open the TWWHA to tourism developers with little guidance to limit their activities. This will only add to the ongoing loss of trust in the Tasmanian community for the processes that should protect the TWWHA for us, visitors and future generations. Tasmanians will feel compelled to step up and do what their government has failed to do, namely protect the TWWHA as the World Heritage Committee has requested.

This draft MP is a wasted opportunity to set clear guidelines for developers and the community to work from. Its failure to do so will simply lock all parties into prolonged legal battles and shatter what is left of the tourism industries social license. No one wins in this scenario – least of all the tourism developers.

I would like to add my voice to those of the many Tasmanians who are outraged by the opaque approval processes for potential tourism developers of the TWWHA. I hope DPIWE and the Tasmanian government can reconsider this draft TMP to make it more in keeping with the wishes of the Tasmanian public as proud custodians of the TWWHA.

Thank you for taking the time to consider my submission

Kind regards

Sharee McCammon