

TWWHA Tourism Master Plan Project Manager

Project Management Office

PO Box 44

Hobart TAS 7001

Dear Project Manager,

I write as a concerned local in response to the TWWHA Tourism Master Plan (the Tourism Master Plan).

Ultimately, the Tourism Master Plan fails to uphold the values and criterion outlined by UNESCO in the protection of such areas, and fails to resolve outstanding issues in relation to commercial tourism ventures in the TWWHA and the impact that these ventures have on the environmental, cultural, and recreational integrity of such areas.

Dangerously, the draft revision enables development of wilderness areas for the benefit of private investors. Only the super wealthy will be able to access what was once a public land area. This method of primitive accumulation is incongruous with what the wilderness represents to those who love to spend time in it.

That the plan is being delivered five years after it was requested by the World Heritage Committee is also problematic. However, in 2015, the TWWHA was rewritten to allow for increases commercial development in wilderness areas by private and government investors. Such commercial investment goes against the very notion of 'wilderness.'

Access to wilderness areas is a thorny issue, full of inequities associated with able bodies, expendable income and expendable time. However, wilderness is not about *convenience* of access and access should not be *bought*. These places *must stay free and accessible to everyone* as much as possible.

In 2015, the UNESCO World Heritage Committee sent a reactive monitoring mission to Tasmania formally recommending that:

The comprehensive Tourism Master Plan details should refine the balance between legitimate tourism development and the management and conservation of the cultural and natural values of the TWWHA based on further consultation and negotiation of competing interests.^[1]

In the view of the mission, the future management can and should establish a guiding framework acceptable to all involved, while also stipulating the elaboration of a specific and participatory Tourism Master Plan, which will refine where and under what conditions tourism and recreation can and should take place in the future.^[2]

Thus, it is evident that the scope of the TWWHA is to identify: *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.^[3]*

The TWWHA should not, then, examine new opportunities for tourism. It should operate within the UNESCO World Heritage purpose, as the Tasmanian Government is bound to, to establish clear boundaries around tourism in the state.

What is problematic is that the report enables greater private expansion into and development of wilderness areas which goes against the UNESCO world heritage values. In conjunction with the proposed Major Projects Bill, this gives opportunity to private investors to, via a simple EOI, develop commercial ventures in remote areas and make wilderness further exclusive to the few. This is particularly concerning around the new visitor accommodation proposals which ignore the existing policy and fail to acknowledge that the Government are reviewing the policy after finding that it is incompatible with some EOI proposals. It is clear that this process is being used as an opportunity to re-write policy to enable private commercial expansion into wilderness areas – such as Lake Malbena and the Tyndall Ranges.

The TWWHA is not a sustainable long-term response to tourism in wilderness areas. It fails to uphold the principles outlined by UNESCO. The TWWHA prioritises government and private interest development over and above the outstanding, universal value of the area to Tasmania, Australia, and the globe.

The wilderness should not be reduced to a consumable object nor should it be privately owned. Wilderness areas in Tasmania are rare; they deserve the absolute best protection policies that can support their environmental, cultural, and recreational integrity in a time of intense deforestation and environmental devaluing and destruction.

Sadly, the TWWHA does not do this.

Regards,

Dr Emily Rudling

^[1] International Council on Monuments and Sites and International Union for Conservation of Nature, Reactive Monitoring Mission to the Tasmanian Wilderness, Australia, 23 -29 November 2015, p. 3.

^[2] Ibid, p.1.

^[3] Department of Primary industries, Parks, Water and Environment, Draft Tourism Master Plan for the Tasmanian Wilderness World Heritage Area, 19 March, 2020, p. 5.