



Tasmanian  
Wilderness Guides  
Association

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TWWHA Tourism Master Plan Project Manager  
Project Management Office  
PO Box 44  
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Dear TWWHA Tourism Master Plan Project Manager,

The Tasmanian Wilderness Guides Association (TWGA) welcomes the opportunity to comment on the *TWWHA Tourism Master Plan* (henceforth referred to as 'the Plan').

### **Introduction to the Tasmanian Wilderness Guides Association**

TWGA formed in 2019 to represent guides working in Tasmania's tourism industry, and has rapidly grown to have a strong membership base with over 80 members. We formed recognising that neither our employers nor entities such as TICT represent or provide a voice for our membership. While often our perspectives may be similar, TWGA has distinct concerns and needs that it sees as essential perspectives to be added to ensure a strong and healthy long-term nature-based tourism sector in Tasmania.

Importantly, today's guides provide a strong base of the future generation of our nature-based industry. We are also core to the quality of our visitors' experiences and wilderness journeys. Our members see themselves as having a responsibility for the places in which we work. We have a vested interest economically, socially and ethically to care for these places and believe we collectively provide a valuable tool to assist the Tasmania Parks and Wildlife Service (PWS) in its work around effective management of the TWWHA.

Both for today, and into the medium and long term, TWGA sees the planning and management of tourism in the TWWHA as critical for Tasmanian guides as the location is our current and future workplace.

The arguments and logic behind our submission are based on our desires for future planning and management of the TWWHA and are based on the following:

- We want to have a healthy long-term industry and a global-leading sector we can be proud to work in. This means the TWWHA should be internationally recognised for its best practice management and Tasmania's brand remains strong. Our future depends on the quality of our wilderness and so we support the protection of wilderness, cultural and natural values. We want to see a tourism industry that balances its need for growth with the need to ensure we minimise our impact on the wilderness and the cultural and natural values of the TWWHA.
- We want visitors to be able to experience our natural areas in a range of ways, their expectations exceeded and their journey and experience to create a lasting and positive impact.

- As employees, we wish for a high quality workplace. We want to be proud ambassadors of our sector and the TWWHA's natural and cultural areas. We want to work for high quality operators and work to the highest standards. Trained and professional guides are an integral part of this.
- We believe guiding is a critical part of the commercial wilderness visitor experience. Guiding should be seen as a profession, and a career able to attract and keep good quality people, with appropriate training and skills and knowledge.
- To achieve these desires for our sector, we believe we need a strong social license amongst our communities. To achieve this there needs to be greater transparency and clarity on permissible tourism development within the TWWHA.
- We believe TWGA and its members can significantly improve the management and planning of the TWWHA, particularly in the areas of assessment and ongoing monitoring. We are out there at the coal face/ in the wilderness, delivering the visitor experience, hearing and interacting with our visitors and observing nature. As such we can add significantly to management practices.

### **Overall comments**

TWGA is impressed with the Plan and the approach it outlines for future management. We would like a similar plan applied to all Tasmanian Parks and Reserves, this would assist in maintaining and raising the Island's profile in nature-based tourism. In considering the Plan overall, we make the following observations:

- PWS needs to be properly resourced (staff and budget) to carry out this Plan and rapidly develop the policies and work required for full activation. This is critical for development of some benchmarks and evaluation systems, and the resourcing for ongoing monitoring systems.
- Overall timeframes need to be added to the actions and policy development areas outlined in this Plan to encourage rapid and effective shift towards the desired outcomes.
- All operators (including existing operators) in the TWWHA should be subject to ongoing monitoring and auditing by PWS to ensure they are delivering high quality operations and continuous improvements are being made against economic, social and environmental goals. We also feel the Plan should specify how PWS will work with tourism operators in the TWWHA to ensure they are held to the assessment standards outlined in this plan while operating in the TWWHA.
- We recommend that the guidelines in the Master Plan be defined in the Management Plan.
- TWGA seeks to have an active and recognised role in the development and management of some actions / areas as shown below. Overall, we wish to be included as the peak representative group for guides and added as a key stakeholder (or on steering committees) for the development and implementation of policies / actions. We are specifically requesting to be included as a 'responsible authority' for the Storytelling action A01, SG8 and SG9 as shown below.

Below you will find our specific comments relating to the sections of the Plan. Red text denotes specific wording change requests. Additional changes and recommendations are also outlined in black text.

## Section 1 Introduction

We have some concerns the Plan does not deliver what the joint IUCN/ICOMOS Reactive Monitoring mission was expecting.

The joint IUCN/ICOMOS Reactive Monitoring mission to the TWWHA in 2015 recommended:

*Recommendation 6 In line with a recent Committee request (Decision 39 COM 7B.35), the Management Plan should establish strict criteria for new tourism development within the property, which would be in line with the primary goal of protecting the property's OUV, including its wilderness character and cultural attributes.*

*Recommendation 7 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.*

In relation to Recommendation 6, we do not believe the current TWWHA Management Plan has established adequately strict criteria for new tourism developments within the TWWHA. **This is a major flaw in the Plan because it sits under and is subservient to the Management Plan.** Having said this, we do believe the additional assessment criteria outlined in the Plan go some way to improving this situation and are in line with what Recommendation 6 said should be the primary goal of the assessment criteria, that is, protecting the TWWHA's OUV, including its wilderness character and cultural attributes. For this reason we believe the Plan's additional assessment criteria should be incorporated into an updated TWWHA Management Plan. This will be discussed in more detail below.

In relation to Recommendation 7, we believe the Plan needs strengthening to provide adequate guidance on the balance between appropriate tourism development and the management and conservation of the cultural and natural values of the TWWHA. Many of the recent controversial issues (such as aircraft traffic, definitions of a standing camp and a methodology for assessing the "wild character" of areas) are not sufficiently covered in this Plan but left up to PWS to determine. Not only does this negate the potential value of the Plan, it also means that many of the most controversial issues will not be subject to consultation and negotiation (as called for in the UN monitoring mission's recommendation) and will be resolved through PWS developing guidelines which may not be publicly available or subject to legal challenge if people believe the guidelines are not being followed. Our industry's reputation and the social license of our profession is not assisted by high profile debates and management issues.

## Section 2. Strategic framework

In general, we are supportive of the strategic principles. We would like to see the first strategic principle – protecting and maintaining the OUV – being expanded to include protecting and maintaining the wilderness values of the TWWHA.

We think this is important because wilderness is what underpins many of the world heritage values that enabled the TWWHA to be recognised as having both natural and cultural heritage of Outstanding Universal Value.

Strengthening the protection of the wilderness and the values it represents is important to TWGA as it helps ensure the TWWHA can continue to be an internationally recognised special place, and enable a quality long term nature based industry to be managed for our members.

*Summary Change requested: 2.2.1 Strategic Principle 1 – Protecting and maintaining the OUV, including the wilderness values.*

In addition, we believe more work needs to occur to help understand the area of “ongoing integrity of wilderness values”, create benchmarks, monitoring and evaluation. There are more details on this in section 7 below.

### **Section 3. Potential opportunities**

We are concerned about the current vision of TWWHA tourism management outlined in section 3 of this Plan; for example:

*Detailed planning is required to achieve the appropriate level of services, facilities and infrastructure for the desired visitor experience.*

We think that such statements reflect a view that we should be altering places to suit the desires of visitors to the TWWHA. As guides, we know that the most authentic wilderness experiences - ones where people develop a strong connection to place - come about when people get to explore places without the mediating influence of overly intrusive infrastructure and facilities. While we know that facilities and infrastructure are necessary in some areas, we would like to see protection of the environment put at the centre of decision-making so that visitor behaviour is shaped to fit the place rather than the place being shaped to suit the visitors.

### **3.8 Remote experiences**

TWGA believes this section of the Plan could have been used as more of an opportunity to define and manage what remote experiences such as the South Coast Track, the Overland Track and Frenchman’s Cap Track will look like into the future. For example, in its description of the South Coast Track, the Plan states:

*The South Coast Track covers some of the most extraordinary coastline found anywhere in Australia. **Beyond the provision of toilets at the key camping nodes along the track, there is limited infrastructure; currently there are no huts.** [bold added for emphasis]*

We are concerned that because the Plan does not provide clarity around what types of visitor experiences (commercial and Parks provided) are appropriate for each remote experience, these decisions will be left in the hands of private tourism operators proposing developments through the EOI process. The problem with this is that the public has only very limited opportunities to comment on these proposals via the EOI and RAA processes and so the future direction and nature of these remote experiences is determined by private enterprises and not the local community. We have also seen that when the local community feel they have not been able to have their say around developments in their national parks, an animosity and distrust grows between the local community and tourism operators, and the social license of tourism operators to work in national parks is weakened.

We note the Plan makes mention of the Tasmanian community's strong feelings about being able to visit places for recreational use "without limitation or restraint" and the need to take into consideration in tourism and presentation proposals the potential to undermine this experience, for example, through a recreational displacement effect (p.34). We believe that it is not just "limitation" or "restraint" that the Tasmanian community is concerned about. It is also about the integrity of their experience and the integrity of the place. The emotional restraint that may arise from the sensation of losing 'place' and a connection to a landscape and geographic space should not be underestimated and should also be considered as part of the assessment of tourism and presentation proposals.

We believe that the future direction of tourism in national parks, including when this requires changes to management plans, should be a collaborative and transparent discussion between the public, PWS and commercial operators.

#### **Section 4. Aboriginal cultural values initiatives**

TWGA is very supportive of this section, its associated Actions A1, A2 and A3 and Actions SG7 and SG8, but also note in Section 5 the need to extend the breadth of interpretation to include other areas such as natural values and the wider story telling needs for the TWWHA.

Specifically, we support the proposal for Aboriginal heritage and cultural awareness training customised for the TWWHA being prepared and rolled out. We agree there is a need to increase the understanding of the significance of Aboriginal cultural values and to ensure non-Aboriginal guides understand what it is and is not appropriate for them to talk about. Some form of acknowledgment/accreditation for Aboriginal content in guiding could be added and this is more widely covered in section 6.6.

We are also supportive of the proposal for training to enhance guides' understanding of cultural and natural values and OUV as well as on the code of conduct regarding the kinds of behaviours expected by visitors. We agree that this training could assist with the accuracy of storytelling and improve the behaviour of visitors to the TWWHA (see section 5).

Dual naming is very important for all mountains, rivers and areas of Tasmania. Guides and tourists should be educated about the cultural landscape and dual names used where appropriate.

#### **Section 5. Other Initiatives**

The actions listed in SG8 need to be expanded and a clearer requirement added for high-level guide interpretation standards. We are very aware of the power of storytelling to create a stronger connection to the place, to educate people on issues and to transform their behaviour post-trip. This has been the core of success of Tasmania's ecotourism industry growth to date, is a very high factor in positive visitor experience social media comments but cannot be taken for granted.

Commercial operators within the TWWHA should be required to employ guides who have professional guiding qualifications (either through TAFE or university) or the equivalent in experience. There should be ongoing support for the upskilling of new and existing guides. The current linkages between tourism operators and PWS is insufficient and guides do not necessarily have access to the information needed to answer visitor queries and maintain high standards. For these reasons, we believe it is important that the Plan acknowledges TWGA as the peak representative

body for guides and is included in discussions (or on steering committees) as a key stakeholder for the development and implementation of policies/actions referred to in this Plan. **We are specifically requesting to be included as a ‘responsible authority’ for the Storytelling action A01, SG8 and SG9.**

We recognise a major issue impacting guide interpretation quality is the casual nature of guide work. Insecure and poorly paid work does not give people the security they need to remain in the industry for long periods of time. The casual nature of guide work results in a situation where there is a high turnover of guides, constant workload around training new guides and a potential lack of high quality guides. These issues impact employers and have a resultant impact on the visitor experience and the broader nature based tourism sector’s brand. Most actions around this are outside the scope of this Plan, and improvements will flow across the whole of Tasmania, but specific changes to actions are shown below in section 6.6.

Recommended change - 5.1 para 2 ‘Clear, strong and consistent messaging around the stories of the TWWHA on the ground, in the trip-planning phase and in the post-trip sharing phase would better engage visitors, create a stronger connection to the place, and encourage visitors to share desired messages.’ Should include recognition about the significant role of guides in enhancing storytelling during the trip.

Recommended change - 5.2 Wayfinding. This section should include reference to guides as a critical way many visitors choose to journey safely into the wilderness. Tasmania has an opportunity to further develop guided experiences as an appropriate option for all people to access wilderness. This should not only be about higher end commercial tourism, but include a wider price range of guided experiences throughout the TWWHA to enable more guests to receive a stronger experience and connection to place, and enables greater controls over visitor behaviours and monitoring.

Action 01 - More clearly develop the breadth of coverage needed for story telling – natural and cultural values, understanding of TWWHA etc.

Action 01 - Add TWGA as a responsible authority.

## **Section 6. Strategic guidance**

6.2.2 We agree with the broad statements around carrying capacity and that capping visitor numbers is not an effective tool in isolation. However, we do believe it should be considered as a potential tool to be used in conjunction with others around visitor management. The focus should be around delivering a quality experience for all visitors. Visitor nodes can be hardened and take quite large numbers of visitors, but visitor capping in some wilderness and self-reliant locations should be considered to ensure the quality of experience. Capping may be done by different means (permits, access limits etc) and may only be applied seasonally. Systems for reviewing and changing visitor caps within the TWWHA should be included in this Plan. Overall capping should be implemented to manage the quality of the experience and protect fragile ecology, it should not be used to limit access or raise revenue.

## 6.4 Science, research and conservation

We think this area should be strengthened by adding an action creating formal and informal opportunities and linkages where guides provide the ‘eyes and ears on ground’ in a similar way to Great Barrier Marine Park Authority’s approach. They have developed and supported partners across multiple approaches resulting in strong linkages allowing guides’ field observations (as many have formal training and background in environment and conservation issues) to contribute to park management and scientific studies. Feedback loops keeping guides up-to-date on the recent insights and learnings are also a highly valued component.

Current Tourism Operator - PWS connections are valuable but do not address science, research and conservation. Additionally we have identified links and feedback between guides, operators and PWS is often weak. There is a real opportunity to connect these stakeholders together in the interest of not only protecting but improving the TWWHA with science, research and conservation. There is the capacity for PWS to link more closely to our members who see themselves as able to help contribute to the management process far more than is currently occurring.

We request adding to this section of the Plan an annual informal workshop between Parks, researchers/academics (not only the University of Tasmania), TWGA and possible other interested parties such as Wildcare, bushwalking groups etc.

### Recommended additions into Actions SG8 and SG9:

- Add a new dot point to SG8 ‘updated science research and conservation findings’ or something similar
- Add a new dot point to SG9 ‘linking work to the science research and conservation monitoring’

## 6.5 Access

We agree with the statements in 6.5 that aircraft noise can be highly intrusive and pose a risk to the visitor experience and wilderness values, but also respect air access to Melaleuca is well established. Technology changes and the potential to extend the runway means this topic, which is highly contentious for many of our members (and visitors and community), means the policies in SG4 and SG5 need to be prepared with considerable consultation. The fly way to Strahan airport and scenic flights with no landing by both helicopter and fixed wing (including float plane) needs to be specifically mentioned.

In addition, given rapid changes in technology and the lifespan of these documents such as this Plan, the terms should be written to be highly inclusive, and cover drones, and manned and unmanned ultralights etc.

TWGA believes the Plan should not just acknowledge that concern over air traffic was a theme of community consultation but also acknowledge why local people are concerned – people, including guides, believe that the integrity of their experience in the TWWHA and the integrity of the values of the TWWHA, will be detrimentally impacted by aircraft transportation.

One of the often unspoken values in the bushwalking community is a belief in equality of access. That is, regardless of people’s socio-economic status or whether they are commercial or independent

walkers, when it comes to our experience in national parks, we are all equal. There is a concern amongst many of our members that helicopters used as a form of people transportation operate to stratify people's experience of place and this is something they are very uncomfortable with.

TWGA believes the Plan should make strong and clear statements that access to wilderness and self-reliant zones for visitors should be through the physical exertion of the individual, such as by foot. We note certain sites are already approved as landing sites and accept this. Rather than noting where landing sites are NOT permitted, we believe a limited and agreed set of places where landing IS permitted should be established and named in the Plan. This list should remain unchanged for the duration of the Plan (although operational permits may be given to provision/manage sites, visitor flights are restricted to agreed landing sites only). We believe these recommendations are in line with enhancing the concept of journey-based experiences, keeping these places special, and preserving the integrity of people's experiences in the TWWHA as well as its values. It would also help prevent zone creep (where areas once classified as "wilderness" are reclassified as "self-reliant") and associated intrusive noise.

We understand the difficulties with the Fly Neighbourly Agreement and believe actions need to be taken to strengthen this. For instance, it may be appropriate to require helicopter companies with permits to adhere to FNA, be monitored and report breaches.

Scenic flight corridors should also be closely managed due to the potential for rapid growth and noise impact on other businesses/visitors and seasonal variations.

## **6.6 Quality assurance**

The title of this section is misleading because it reads as if it relates only to 'visitor interpretation'. While we are recommending a title change to this section, we do think the Plan should address the issue of quality assurance. This issue is covered in more detail under section 7.

### **Recommended change – title change 6.6 Quality assurance around interpretation**

In relation to the specific issues of quality assurance around interpretation, the commentary notes *"training and professional development for operators, which could focus on two key areas: cultural heritage awareness training and best practice presentation training"*. TWGA members feel strongly that this focus is too limited and major areas around natural values and OUV, park management etc also need to be included.

**Change to SG8 (see also 6.4): Add TWGA as a 'responsible authority'** - We have a much stronger understanding of guide needs and ways guides prefer to 'learn' / approaches that will help strengthen results here (TICT and owners have their own views but there are clear differences/gaps).

## **6.7 Strategic data collection and analysis**

This links with 6.4 and data collection on both visitor monitoring/social impact as well as environmental impacts are areas where our guides can substantively assist. It is a TWWHA requirement and benchmarks, monitoring and cumulative impact studies should be undertaken.

**Recommended changes:**



- Strengthen the third dot point to be clearer ‘collection and monitoring of key indicators around the core values in the TWWHA in line with the Management Plan’.
- SG9 Add TWGA as a ‘responsible authority’. We believe we can add value directly as there is a strong collaborative ethos among guides that could assist in field work while there is an understandable level of competition that can exist between owners. Secondly, owner-based programs do not necessarily filter to guides and consistency in field work will be essential here.

## Section 7. Assessment guidelines

If implemented as described TWGA believes the Plan’s assessment guidelines substantially improve the quality of the PWS’s RAAs.

Having said this, we note that the Plan takes as its starting point the PWS’s RAA and does not clearly describe the connection to the Office of the Coordinator-General’s EOI process. The problem with this is that we now effectively have two processes managing developments in national parks (including the TWWHA) and the EOI process is one that could potentially undermine the stronger protections outlined in this Plan for the TWWHA. This is because in the EOI’s assessment principles it actually allows for the approval of tourism developments that are not compliant with the Management Plan.

**We recommend that the guidelines in the Master Plan be defined in the Management Plan. We believe the Plan should be explicit in stating that proposed tourism developments must be compliant with the Management Plan. This is because the Master Plan is subservient to the Management Plan and a clear approach is needed. The Management Plan already contains additional criteria for activities and proposals in the TWWHA. Therefore, it is entirely appropriate and achievable that the additional guidelines proposed in this Plan be included in the Management Plan.**

A consistent and strong high quality industry is essential for social license and we would like to see all existing, as well as new, operators being regularly monitored and audited by PWS to ensure compliance, including with the additional assessment guidelines proposed in the Plan. We think the need for a more robust monitoring system is evidenced by the ABC’s revelations<sup>1</sup> last year that PWS does not hold clear electronic records of how many tour operators working in protected areas have breached their licence conditions. As guides we believe our future relies on high standards of operations, and this enhances our ability and capacity to professionally deliver on visitor expectations. The GBRMPA High Standard Operator approach is one effective example and we should shift to a better practice and improve our approach here.

Recommendation: The Plan should include a section on quality assurance schemes for operators (existing and new) working in the TWWHA. This must include auditing as well as approaches to managing and recording non-compliance.

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<sup>1</sup> Baker, Emily (2019), ‘Tasmanian tour operator oversight policy raises concerns about accountability for licence breaches’, ABC, 29 September 2019, <https://www.abc.net.au/news/2019-09-29/tasmanian-tour-operator-licence-breach-oversight-concerns/11558350>.

## **7.1 Purpose of assessment policy guidelines**

We agree with the statement in the Master Plan that:

*Providing publicly available policy directions for the assessment of proposals in the TWWHA, is an opportunity to provide for increased certainty for proponents and the community... assessment criteria need to provide for transparent, clear, consistent and relatively certain outcomes for tourism proposals in the TWWHA. This will help instil confidence in the decision-making process on the part of the community, investors and the tourism industry.*

TWGA believes that to create trust and transparency, the public should have access to information regarding all aspects of how the TWWHA is managed. We suggest the Plan state that all policy guidelines referred to in the Plan be made available to the public. Additionally we believe all tourism operator lease and license agreements should be publicly available.

## **7.6 Noise pollution** – air access comments, see 6.5.

This should explicitly also state drones as banned. Given rapid changes in technology it should aim to have very inclusive language, potentially mentioning things like manned and unmanned ultralights.

## **7.7 Group numbers**

APG6 Note the need to consult and update/review the *PWS Walking Track Classification Policy 2014*. TWGA wishes to be included as a stakeholder in these consultations.

T3 should be explicitly included in the Section 7.7 text.

## **7.8 Visual impacts**

The analysis in this area should be formalised and rapidly improved. PWS needs to be clear regarding guidance on what advice is to be obtained.

APG 7: Add PWS as a “Responsible Authority” (required to provide guidance on what a visual impact assessment will entail).

## **7.9 Visitor accommodation, huts and camping**

Our industry needs to be well respected with a social license to flourish into the future. The interpretation of the definition of the term ‘standing camp’ has created tension and issues with recent new tourism examples such as Halls Island. The definition of a ‘standing camp’ is not provided in the Management Plan. While the Plan calls on PWS to develop guidelines that provides direction on clear, discernible difference between types of visitor accommodation, we would note that such a policy has existed in the past - the *PWS Standing Camp Policy 2006* – but that this policy was never made publicly available on PWS’s website. We also believe that in creating new policy guidelines, the public should be provided with the opportunity to comment on the proposed guidelines.

Recommended change: Add to APG8 at end ‘ This policy document should define terms that have various interpretations such as ‘standing camp’ and be a publicly available document, developed with

public input and resulting in clearer, less open to interpretation application and transparency, that builds community trust and integrity in the planning and development phase.

### **7.11 Protecting natural values**

Recommended change – add words to APG10. ‘PWS detailed guidance document for proponents includes clear information about the circumstances in which proponents must undertake additional or targeted studies to fulfil Management Plan requirements and specifies that a suitably qualified technical specialist must undertake these studies.’

### **7.12 Protecting cultural heritage values**

We agree with the statements made in 7.12 but believe APG14 needs strengthening. Desktop reviews are not sufficient for development proposals in the TWWHA, as the Plan already notes much of the TWWHA has not been surveyed. Also further strengthening, as shown below is important, not only because it is in line with the Best Practice Ecotourism Guidelines but because it recognises that we are talking about a living culture and being able to access country is integral to this.

Recommended change to APG14: ‘An onsite Aboriginal Heritage Assessment Report (including an Aboriginal cultural landscape assessment) must be prepared for all development proposals in the TWWHA. This must be carried out by an Aboriginal Heritage Officer and a heritage specialist or archaeologist, and include consultation with the Tasmanian Aboriginal community.’

‘The assessment should state how the development will impact on the ability of the Tasmanian Aboriginal community to connect with/access their country and continue to practice their culture today.’

Change the order of the table so APG 14 appears after APG13 or renumber so logical

### **7.14 Cumulative impact**

TWGA agrees with the intent of this section and sees it as vital for long term management. It encourages PWS to review global examples and good practice elsewhere. It notes the importance of rapidly establishing baseline/benchmarks to help measure change over time, recognising systems and approaches for monitoring will develop and alter over time.

### **7.15 Impacts on wilderness values and quality**

The Plan acknowledges the Management Plan fails to include criteria to protect wilderness. For example, the Plan says:

*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.*

We believe this is a fundamental flaw in the Management Plan and think the Master Plan provides an opportunity to remedy this.

Currently the Plan states in some places that wilderness values are protected so long as areas of the TWWHA are designated within the Wilderness Zone and this zone remains free from built infrastructure and mechanised access. For example:

*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 [TWWHA] area in the restrictive Wilderness Zone.*

We agree with this statement however we believe wilderness values can be found in all areas of the TWWHA, regardless of the Management Plan zoning. Indeed, it is in areas classified as “self-reliant” and “recreation” that visitors are most likely to come in contact with the TWWHA. The loss of wilderness in these areas might actually be more detrimental to the visitor experience as it implicates authenticity of a wilderness experience . Consequently, it is important that an assessment of loss of wilderness values is undertaken for all developments in all areas of the TWWHA.

We also appreciate there is considerable difficulty in establishing a system for measuring and evaluation the “integrity of wilderness values”. Despite the difficulties, we strongly believe the Plan should propose criteria or a process to assess wilderness values rather than just acknowledging problems with the current methodology. TWGA would support the approach for assessing the “wild character” of an area described by M. Hawes, G. Dixon, C. Bell in the book *Refining the definition of Wilderness: Safeguarding the experiential and ecological values of remote natural land*. Below you will find an extract from this book, describing the components of wild character.

Extract from by M. Hawes, G. Dixon, C. Bell in the book *Refining the definition of Wilderness: Safeguarding the experiential and ecological values of remote natural land (referred to in 7.15)*

Component	Description
<b>Biophysical naturalness</b>	Measure of the degree to which an area's ecological, geological and geomorphological systems remain in an essentially natural condition: that is, unaltered and uninfluenced, either directly or indirectly, by the impacts and activities of human society, other than Indigenous societies following predominantly hunter-gatherer ways of life.
<b>Linear remoteness</b>	<p>a) Map distance from major infrastructure and landscape disturbances as listed in 7.2.2 and 7.2.3.</p> <p>b) Map distance from minor artificial features and environmental disturbances such as lightly grazed land, survey markers, and navigation lights. Distances will be weighted to reflect the relative impact of different types of feature; for example, grazed land at 3 km may have the same impact as a survey marker at 1 km.</p>
<b>Access-time remoteness</b>	<p>a) Travel time by foot or other non-mechanised means from the nearest point of mechanised access including roads, jetties, landing strips, shorelines accessible to powered boats, and publicly accessible helipads.</p> <p>b) Travel time by any permissible means (including mechanised travel) from the nearest settlement. This factor would be weighted to reflect the type of travel and the frequency with which such travel occurred; for example, visits by small powered boats two or three times a year would have less impact than weekly helicopter landings.</p>
<b>Other evidence of modern technological society</b>	<p>a) Viewshed naturalness: A measure of the visibility of artificial features and landscape disturbance such as roads, buildings, logged areas and farmland.</p> <p>b) Transient impacts: A measure of the extent to which a visitor's experience is impacted by disturbances such as aircraft overflights or encounters with other visitors.</p>

Table 2: Components of 'wild character'

### Recommended changes to APG13:

- 'Tourism and presentation proposals **in all zones** in the TWWHA are to demonstrate...'
- **Add a new dot point 'clearly identify mitigation and minimisation actions to be taken to address each impact/issues.'**
- 'To support the attainment of this policy outcome, the PWS will require an assessment for all infrastructure and buildings, including the rerouting of tracks, toilets, huts and so forth, regardless of proponent, and undertake a review of current methodology for wilderness quality **and develop a system to enable measurement and evaluations to rapidly occur'**

## **Glossary**

The term ‘minimal impact development’ is used and should be defined. We would support a definition of minimal impact as “development that has as little impact socially, culturally and environmentally on its geographical space as possible”.

Thank you again for the opportunity to contribute to the TWWHA Tourism Master Plan. We trust our feedback will be duly considered and taken on board when preparing the final Plan. Our main aim in coming together to form this new association was to have a legitimate voice that would be included in any consultation and decision-making process regarding Tasmania’s Wilderness. The TWWHA is not only a place we love, it is the base for our industry and so we are determined to be a part of how it is managed, protected and conserved for future generations.

Yours sincerely,

Adrien Butler

on behalf of the Tasmanian Wilderness Guides Association