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To Whom It May Concern,

On behalf of Inala-Bruny Island Pty Ltd, trading as Inala Nature Tours, I would like to express concern over the draft Tourism Master Plan for the Tasmanian Wilderness World Heritage Area (TWWHA).

Inala Nature Tours is a family owned and operated ecotourism business based on south Bruny Island, Tasmania, which has been operating for over 26 years. Our core business entails running high-end personalised bird-watching and natural history tours across Tasmania and wider Australia, as well as offering tours to select overseas destinations. One of our primary values is providing our clients with the opportunity to observe wildlife in its natural habitat, and we strongly adhere to a 'leave no trace' philosophy.

Of concern for us in the draft Tourism Master Plan for the TWWHA are:

1. Maintaining 'wilderness' in the TWWHA
2. Transparency in the Reserve Activity Assessment processes
3. Provision to extend the airstrip at Melaleuca

### **Maintaining 'wilderness' in the TWWHA**

Inala Nature Tours is concerned that the draft Tourism Master Plan is overlooking the term 'wilderness' as it is not specifically referenced in the vision statement (which is consistent with the vision in the 2016 Management Plan for the TWWHA):

'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'

We feel that it is important to remember that we are managing the 'Tasmanian Wilderness' WHA as a whole, rather than for the sum of its parts, and not purely as an 'obligation' as part of Australia's signatory to the

World Heritage Convention. 'Wilderness' according to the National Wilderness Inventory is comprised of four key indicators<sup>1</sup>:

- Remoteness from settlement
- Remoteness from access
- Apparent naturalness
- Biophysical naturalness

Section 3.8 of the draft Tourism Master Plan states that 'Tasmanians and visitors to Tasmania alike are seeking assurance that the TWWHA is being managed for its OUV, as well as maintaining its wilderness values and the opportunity to experience places with little or no human intervention'. However, the Recreational Zoning of the South Coast Track seems inconsistent with this statement given that the definition of Recreation Zone in section 2.3.3 says 'your stay may include a night in environmentally sensitive, purpose-built accommodation with food prepared and served by guides'. On their website about walks in Tasmania, Discover Tasmania says that the existing South Coast Track walk is possibly 'the most challenging yet rewarding walk here...where there are no roads or access...it's what makes it special'<sup>2</sup>. The provision of up to seven commercial huts permitted on the South Coast Track under the 2016 TWWHA Management Plan threatens to undermine this uniqueness, and we would urge any future tourism planning to reconsider the need for purpose built accommodation on the South Coast Track.

### **Transparency in the Reserve Activity Assessment (RAA) processes**

The Tourism Master plan is the result of the endorsement of the 2015 IUCN/ICOMOS Reactive Monitoring Mission, and it is important to remember that the Mission report says that the Tourism Master Plan 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'<sup>3</sup>

World Heritage sites belong to all the peoples of the world, irrespective of the territory on which they are located<sup>4</sup>, and the Tourism Master Plan for the TWWHA should seek to define tourism parameters – as in, refine the balance - and not seek to determine 'opportunities for investment in facilities and experiences'<sup>5</sup> using the Recreation Standards Framework to identify gaps in the visitor experience.

Currently the RAA is not a process that is articulated in legislation<sup>6</sup>. The draft Tourism Master Plan does not mention that the RAA process is currently under state government review and that at present there is not enough transparency in the process, nor are there any appeal rights to the decisions of an assessment.<sup>7</sup>

Inala Nature Tours would like further clarification on the following statement (draft Tourism Master Plan, p66), particularly around the term 'flexibility':

'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. Some flexibility is required so as not to be so prescriptive as to prevent unique or innovative tourism proposals and presentation opportunities that are consistent with protection of the OUV from being considered.'

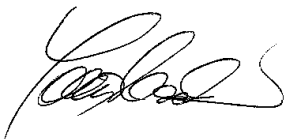
We further suggest that future expressions of interest for tourism development in the TWWHA be postponed until the RAA review is complete.

### **Provision to extend the airstrip at Melaleuca**

The issues with aircraft disturbance over reserves are well documented. The draft Tourism Master Plan for the TWWHA says that 'planning for Melaleuca is...to focus on improving the visitor experience rather than attracting additional visitors' and that 'Melaleuca is to be retained as a high-quality, low visitor number experience'.<sup>8</sup> This is consistent with the UNESCO Sustainable Tourism Toolkit of trying not to increase visitor numbers where there is limited capacity,<sup>9</sup> however, the provision for extending the landing area at Melaleuca<sup>10</sup> is suggestive of larger aircraft, and possibly more visitors? Inala Nature Tours seeks clarification on why the airstrip at Melaleuca would need to be extended given the area is the breeding site of the critically endangered Orange-bellied parrot. This year is the first time in a decade that the flock at Melaleuca has topped 100 birds, and at one stage the wild population was down to only 17 individuals.<sup>11</sup>

In summary, Inala Nature Tours would like clearer understanding of these issues in the draft Tourism Master Plan, and would suggest that the draft be reviewed to more carefully consider that this is not simply a reserve or national park, but is a World Heritage Area, and that any potential tourism development should be subject to greater public scrutiny and transparency.

With thanks,



Dr. Tonia Cochran  
Managing Director  
Inala-Bruny Island Pty Ltd.  
Trading as Inala Nature Tours.

1. <https://www.environment.gov.au/node/20123#indicators>
2. <https://www.discovertasmania.com.au/about/articles/2019/best-walks-in-tasmania>
3. Tourism Master Plan for the Tasmanian Wilderness World Heritage Area, p3
4. <https://whc.unesco.org/en/about/>
5. Tourism Master Plan for the Tasmanian Wilderness World Heritage Area, p(v)
6. <https://planningreform.tas.gov.au/updates/questions-from-pia-event-8-may-2020,-via-zoom>
7. EDO Tasmania, 2018, Helicopters, Huts and Having Your Say briefing notes, May 2018, p8
8. Tourism Master Plan for the Tasmanian Wilderness World Heritage Area, p24
9. <http://whc.unesco.org/sustainabletourismtoolkit/guides/guide-6-managing-development-tourism-infrastructure>
10. Tourism Master Plan for the Tasmanian Wilderness World Heritage Area, p57
11. <https://www.theguardian.com/environment/2020/apr/27/numbers-of-critically-endangered-orange-bellied-parrot-soar-from-low-20s-to-more-than-100>