

Dr Emma Lee

30th June 2020

To whom it may concern:

RE: Draft Tourism Master Plan (TMP) for the Tasmanian Wilderness World Heritage Area (TWWHA), public comment

I write to include my public comments on the Tourism Master Plan (TMP). I draw on my experience as an Aboriginal and Torres Strait Islander Research Fellow, RegionxLink, Swinburne University of Technology, Burnie office, and an expert in joint management to provide a personal submission as an Aboriginal Tasmanian.

These comments relate to the framework of the draft TMP 2020, the TWWHA Plan of Management 2016 (Plan) and the World Heritage Committee's (WHC) recommendations from its 40th annual meeting in Istanbul, Turkey, 2016.

Background:

- 1) The TWWHA Plan is a statutory document that was approved by the Tasmanian and Australian Governments in 2016. This Plan was the first time that a joint management framework of a protected area in Tasmania was enacted and this achievement is noted by the Minister for Environment in the Foreword to the Plan. The new framework has allowed greater inclusion, participation and rights-holder engagement for Aboriginal Tasmanian people.

The Plan outlines on p. 96, *Section 4.1 Governance: Joint Management*, that it:

provides for a greater Aboriginal voice. It also provides greater capacity, responsibility and accountability for the management of cultural values through a joint management arrangement to ensure KDOs are achieved.

- 2) This joint management framework was acknowledged and highlighted in the WHC's decisions in 2016, p. 80, where they state:

Both governments commit to an integrated approach to the protection and management of cultural and natural values of the property, including through the development of joint management arrangements with the Tasmanian Aboriginal Community and the provision of adequate resources to this approach and other priority concerns such as fire management, biosecurity and the consideration of the intricate linkages between the property and its terrestrial and marine surroundings.

- 3) The WHC also noted from that 2016 meeting, that a:

separate Tourism Master Plan will be elaborated in order to refine the balance between legitimate tourism development and conservation of cultural and natural attributes, based on consultation and negotiation with relevant stakeholders, including the Tasmanian Aboriginal Community.

Context:

The draft TMP has resulted from the directive of the World Heritage Committee to address the tourism, joint management and Aboriginal consultation themes of the TWWHA Plan.

Therefore, it is of concern that the *authors of the TMP have explicitly unhooked the TWWHA Plan, and its outcomes, objectives and timeframes, from the TMP work*. It is stated on page 45 of the TMP that “it is recognised that joint management is beyond the scope of this project”. Joint management is the basis upon which the 2016 Plan was enabled and recognised by the WHC, thus it must be considered integral to the process of the TMP.

However, this is not the case and instead the TMP is adrift of linkages, strategic work and Indigenous benefit outlined in the 2016 Plan. Instead of linking outcomes and using the Plan as a template for design, the TMP has gone its own pathway and replicated findings from it, reduced and neutralised the role of self-determining governance for Aboriginal Tasmanian people and struggles to make one concrete target, goal, outcome or timeframe with concomitant resourcing that addresses the WHC requirements.

Comment:

Governance is important to Aboriginal Tasmanian people who hold an interest in the TWWHA. Governance is the mechanism that gives rise to joint management, whereby power-sharing agreements are made between parties. In this case, the parties are the Tasmanian Government (primarily) and Aboriginal Tasmanian people who will jointly manage the cultural Outstanding Universal Values criteria.

During consultation and planning with Aboriginal Tasmanian people for the 2016 Plan, self-determination over governance decisions was a stand-out feature of the joint management framework. The right of Aboriginal Tasmanian people, communities and organisations to be governance actors for TWWHA country outside of government structures was made explicit in the Plan, where on page 9, that:

it will implement a timeframe and process for developing governance arrangements that provide a role for a non-government Aboriginal organisation in the joint management of the cultural values of the TWWHA.

The TMP, instead, has not referred to this important Key Outcome of the Plan, rather it has favoured a 7-member group within government, under Aboriginal Heritage Tasmania and Parks & Wildlife Service (p.48) in direct contravention of Plan recommendations. The 2016 Plan states that “interpretation and presentation of Aboriginal cultural values must involve Aboriginal people in all levels of decision-making” (p. 101). This would be the role of the Cultural Management Group, as per the Plan, to undertake the large-scale consultations to ensure Aboriginal engagement.

The recommended governance structure does not adequately address the need for self-determined governance by autonomous Aboriginal Tasmanian organisations and instead reduces this critical role of joint management to a administrative function of government that is justified by “large-scale engagement programs, such as that undertaken for the development of this Tourism Master Plan and the Interpretation Guide, cannot realistically be conducted every time there needs to be some

level of consultation with the Aboriginal community” (p.45). Yet this is what the 2016 Plan and the WHC explicitly call for: large-scale engagement over joint management decisions, such as the TMP.

The lack of any target or key outcome associated with the TMP ideas presented is in direct contrast to the key outcomes of the 2016 Plan. For example, the TMP states that (p.44):

dual naming of both the TWWHA as a whole, and potentially different areas and features within the TWWHA, would require extensive consultation with the Aboriginal community. While dual naming may take time to facilitate...

The 2016 Plan states that dual-naming of the TWWHA must be gazetted within 3 years and renamed within 5 years (p.107). Yet the TMP states no timeframe, nor refers to the Plan recommendations. It is also perplexing that earlier calls to reduce large-scale consultation in favour of a 7-member group are ignored in favour of calling for them here.

The 2016 Plan calls for the **establishment of a Cultural Management Group**, whose main functions will be (p. 96):

- providing advice to the Director about the management of Aboriginal cultural values in the TWWHA;
- policy development and planning in the TWWHA;
- facilitating research, monitoring and evaluation in the TWWHA;
- coordinating and facilitating engagement with Aboriginal people, and advancing of joint management arrangements;
- facilitating a Reconnection to Country program and interpreting and promoting cultural tourism in the TWWHA; and
- implementing the relevant actions and policies in the Management Plan, in consultation with Aboriginal people, including a biennial review and report on progress towards KDOs.

However, these recommendations have been replicated in the TMP without the finer detail and variously placed under new governance recommendations, business opportunities and cultural interpretation and without the resourcing, timeframes and governance within the Plan. The TMP has also weakened the role of the Group by having responsibility for dual-naming only, although in what capacity or governance is not clear as it is not mentioned beyond its name (p.48).

Opaque Indigenous contracts in lieu of joint management arrangements are referred to in the footnote 22, page 59, where:

Aboriginal Heritage Tasmania has advised that a Request for Quotation process has been initiated and it is expected to finalise a contract in 2020. AHAT and ACAT will be presented directly to DPIPWE staff by a Tasmanian Aboriginal organisation or business. It is anticipated that approximately 10 sessions will be conducted each year, with 30 sessions from July 2020 to June 2023. The sessions will focus on Aboriginal cultural values and the contemporary context. Once established, access to ACHAT may also be made available more broadly to staff across the Tasmanian State Service, to industry and the Tasmanian community.

This footnote was not associated with the Aboriginal initiatives section of the TMP but found under the Strategic Guidance section. It is concerning that the concepts of joint management, regional engagement and widespread economic benefit for multiple Aboriginal Tasmanian communities and people are set aside in favour of an individual benefit and from metrics not found within the 2016 Plan.

It would seem that, for example, a simple joint management solution to issue of staff training would be a priority of the Cultural Management Group to deliver a robust and accredited government

package to centralised staff, while at the same time the proposed cultural hubs would act as a space for local Aboriginal Tasmanian communities to engage with local staff, visitors and business to spread a benefit and deliver training packages within the regional across multiple members, families and organisations that is connected to caring for country.

However, the decision for procurement to a private and sole business arrangement has been made and enacted ahead of joint management governance, the role of self-determined communities in defining community benefit, without linkage to cultural hubs and outside of the terms of the 2016 Plan for broad-scale engagement of all Aboriginal Tasmanian people.

The preparation of the **TMP and use of language** should also be commented upon. The 2016 Plan respected Aboriginal governance of men's and women's business, having both a statement from the male Chair of Aboriginal Heritage Tasmania, Rocky Sainty, and from the first Aboriginal representative to the TWWHA, Aunty Dr Patsy Cameron AM. This respectful aspect of cultural acknowledgement with both statements is missing from the TMP.

It is also concerning the use of *palawa kani*, as it is not clear the arrangements for use of the language by the Tasmanian Government, such as whether they have permissions to do so or it is in accordance with the Dual-Naming policy of the government, and referred to in the TMP. Given that the owners of the *palawa kani* language have previously issued '[take down](#)' notices, such as to Wikipedia, there is a risk that the overarching policy of dual-naming can be undermined without clear direction on use within documents relating to the 2016 Plan.

The language of the 2016 Plan is predominantly of 'Tasmanian Aboriginal people' for the purpose of inclusion and diversity. The Tasmanian Government's preference under the Reset the Relationship policy is for multiple 'communities' to be acknowledged, such as 'Aboriginal Tasmanian communities' or 'Aboriginal Tasmanian people'. This terminology allows for plural views to be respected and provides a means of gaining social legitimacy for plans, policies and strategic direction. Therefore, to see the terminology of 'Aboriginal community' in its singular throughout the TMP does not do justice to the many organisations, families and communities that contribute to the varied and multiple cultural values of the TWWHA.

The **lack of connection to existing interpretation resources** from the TMP is evident in the neglect to mention existing and outstanding Indigenous programs such as [The Orb](#), is a multi-million dollar, award-winning Aboriginal Education web platform with open access. Given that the program is an Aboriginal Tasmanian initiative, embedded within the Tasmanian Government's education system, with Aboriginal cultural values infused within each segment of learning, there are widespread applications, respect towards Indigenous contributors and cost savings to be made here.

Finally, on a personal note, there is a sadness in how the **TMP has stripped away the vitality and joy of Tasmanian Aboriginal people's engagement** with TWWHA country and the 2016 Plan. Not one photo of Aboriginal Tasmanian people is to be found in the dedicated section on values, which is in stark contrast to the *album of engagement photos in the 2016 Plan*. Aboriginal Tasmanian people are removed from the imagery in favour of the things we produce, the static remains of our cultural enjoyment, knowledge, traditions, protocols and connections with TWWHA country.

In the 2016 Plan, it is very clear how diverse and multiple Aboriginal Tasmanian people are able to articulate the connection with TWWHA country. In particular, country has an agency of its own to influence how we connect and why. On page 56, Distinguished Professor Maggie Walter writes that our health as cultural peoples depend upon our very voice being central to the interpretation and promotion of our cultural Outstanding Universal Values:

Our relationship to the TWWHA must be supported to be a source of autonomy, social integration, social and cultural cohesion and healing – all influencing our wellbeing. Keeping Country safe, and keeping our relationship to Country appropriate, means engaging actively with the TWWHA lived environment, materially, culturally, spiritually and educationally. Physical connection is the medium whereby Aboriginal autonomy, and its social, cultural and economic benefits, is achieved within a framework of relatedness to Country and kin.

As an Indigenous voice, ours is central to the 2016 Plan and thus our consent is explicit to participate in TWWHA country governance and management. This free, prior and informed consent is missing from the TMP. It is a lifeless and morose document void of our aspirations and articulated needs and in its place we become unspeaking beings in a remotely managed landscape, rather than vibrant, healthy connected peoples in country.

The **TMP does not reach the standards required for a World Heritage Area that hold cultural Outstanding Universal Values** and the engagement with its First Nations peoples. This is a shame, as the 2016 report of the Reactive Monitoring Mission (from the WHC) stated that consultation was outstanding, for “both the quality and the level of participation in the process appear high by global standards” (p.24). The report also noted the quality of Indigenous engagement, where:

is increasingly accepted today, including by the State Government, that there are competing voices within the heterogeneous Tasmanian Aboriginal Community, a view fully endorsed by the mission team as an indication of a maturing debate.

Thus the quality and type of large-scale Indigenous engagement for the 2016 Plan, which was celebrated internationally for its diverse opinions, pathways and connections that led to a collaborative and joint statutorily-approved process, is somehow transformed into a burden and risk by the TMP that needs containment and compliance of Aboriginal Tasmanian people.

Relationships are built on trust, which was gained in the 2016 Plan between multiple Aboriginal Tasmanian organisations, families and communities and the Tasmanian Government, and should be retained in subsequent plans, such as the TMP, as a matter of course and for what is the right thing to do in caring for TWWHA country.

Yours sincerely,

Emma Lee

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