

---

**From:**  
**Sent:** Wednesday, 22 April 2020 5:37 PM  
**To:** TWWHA Tourism Master Plan  
**Subject:** Representation in respect to the draft Tourism Master Plan for the TWWHA

Dear Sir/Madam,

A brief reading of this draft may lead a person to believe that this is a revolutionary document that will result in better management of the Tasmanian Wilderness World Heritage Area with respect to tourism. In particular if the Strategic Guidance documents were to be faithfully produced and acted upon and likewise the Policy Guidelines faithfully adhered to, we would expect to see an end to inappropriate development and activities being proposed in the TWWHA. Indeed if we could trust our Parks and Wildlife Service to act to protect the Outstanding Universal Values of the TWWHA this could indeed be the outcome... But for one sentence on page 10 - which says "Importantly the strategic principles work together and each of the strategic principles is equally weighted: none is more important than the others and they should not be read in isolation from each other"

I would beg to differ. Protecting and maintaining the OUV is by far the most important principle and the reason it is a WHA. Whilst Strategic Principles 2 and 3 are important they are both subordinate to this. Strategic Principle 4 - Valuing the role of Tourism should be seen as subordinate to all three.

The other causes I have for pessimism are the way that the TWWHA Management Plan was modified in 2016 to reduce the protections to the OUVs and the behaviour of doing Reserve Activity Assessments in secret.

The treatment of the proposed helicopter tourism development at Lake Malbena is illustrative of this. Here is a project that purposely reduces the remoteness of the place it seeks to exploit. It seeks to bring people who are by no measure self reliant into the middle of the Self Reliant Recreation Zone (only recently altered from its previous zoning of Wilderness). In the meantime it would subject the many who have used the area for walking, fishing and quiet contemplation of wilderness to frequent helicopter traffic. It clearly would fail a Cost/Benefit analysis and a Social Impact analysis and probably Visitor Accommodation Guidelines. Therefore how the Tourism Master Plan would treat this proposal gives us a good idea whether it represents an improvement on the status quo.

I would submit that changing that sentence on page 10 could make all the difference. Therefore I would recommend altering it to read:

"Strategic Principle 1 is the most important consideration. Consistent with satisfaction of that Strategic Principles 2 and 3 should be satisfied. Strategic Principle 4 should be pursued if and to the extent to which it can be done without interfering with Strategic Principles 1,2 &3."

I would also submit that all RAAs for tourism in the TWWHA be open processes with full disclosure and public submissions, open to scrutiny and appeal. The PWS should not be able to approve a project unless they can show that it complies with TWWHA Management Plan and the Strategic Guidance and Policy Guidelines referred to in this Tourism Master Plan. This determination should be appealable on merits (not just procedural) grounds.

Section 7.4 on pages 67-68 refers to bushfire management. It is also necessary to consider the impact of management burns. Much of the TWWHA is a cultural landscape with respect to a clear history of fire management by Palawa peoples. It is therefore foreseeable that management burns will be required from time to time to maintain this. The existence of built infrastructure should anticipate this and not be built in a way which would preclude this form of management.

Yours faithfully  
Phil Stigant