

A representation by Tourism Industry Council Tasmania regarding the

## *Draft* Tasmanian Wilderness World Heritage Area (TWWHA) Management Plan 2014

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## Tourism Industry Council Tasmania

Tourism Industry Council Tasmania (TICT) is the peak body that represents and acts for the Tasmanian tourism industry.

The Council is a not-for-profit organisation that promotes the value of tourism and advocates policy on behalf of the industry.

Tasmania is Australia's most tourism dependent state, with tourism directly contributing \$1.05 billion to Tasmania's Gross State Product. Tourism directly employs 17,000 Tasmanians, and indirectly supports another 23,000 jobs in the state. 1 in 8 working Tasmanians rely on tourism for employment – more than anywhere else in Australia.

The **mission** of TICT is to provide a strategic direction and united voice for the sustainable development and growth of the Tasmanian tourism industry.

TICT's **vision** is for a unified tourism industry working with Government and the community to develop:

- A world class tourism industry that delivers quality products, services and experiences for our customers;
- Sustainable growth in profitability for the industry; and
- A buoyant economy for Tasmania.

## Acknowledgements

As a reflection of the tourism industry's recognition of the deep and complex history of this island and its wilderness, *Tourism Industry Council Tasmania wishes to acknowledge the traditional owners and custodians of the Tasmanian Wilderness World Heritage Area and the other lands upon which our industry operates.*

*TICT also acknowledge those Tasmanians, past, present, and future, who have joined with the Tasmanian Aboriginal communities in their custodianship of the Tasmanian Wilderness.*

To the Aboriginal peoples, the conservation movement, governments, our fellow tourism operators, and members of the Tasmanian community, who have campaigned, fought, advanced and achieved the protection and ongoing conservation of this extraordinary natural environment and cultural heritage – thank you for what you have done to ensure the conservation and recognition of these special places as World Heritage for generations to come, inspiring visitors from around the world.

As an industry we seek to not only recognise, but also celebrate and add to, the work and passion of past and present custodians and conservationists in our presentation of the TWWHA.

The tourism industry believes all Tasmanians share responsibility for the ongoing management, conservation and presentation of this Tasmanian Wilderness World Heritage Area.

## Summary of Representation

*“Tourism and biodiversity are intimately related. In fact, the prosperity of tourism industry is directly dependent on healthy ecosystems...Tourism related activities and services, if carried out in a sustainable manner, can have major synergies with the conservation agenda”*

- International Union for the Conservation of Nature (IUCN)<sup>i</sup>

- Tourism is a major, sustainable industry operating and generating income in the Tasmanian Wilderness World Heritage Area
- The Tasmanian Wilderness is a major attraction, and source of destination brand and appeal underpinning the Tasmanian tourism industry
- As the peak body representing the Tasmanian tourism industry, Tourism Industry Council Tasmania welcomes the opportunity to comment on the *Draft Tasmanian Wilderness World Heritage (TWWHA) Management Plan 2014*
- The industry has identified a broad vision and key goals for tourism in the Tasmanian Wilderness World Heritage Area “to deliver the most contemporary Wilderness World Heritage experience, offering shared, life changing moments”
- Tourism Industry Council Tasmania welcomes the more practical and reader-friendly format of this *Draft Tasmanian Wilderness World Heritage (TWWHA) Management Plan 2014* and the greater capacity for sustainable, commercial tourism that it will provide when instated
- TICT endorses the greater recognition of the importance of presentation, and the need for planning for presentation, in the *Draft Management Plan*.
- TICT looks forward to participating in the development of the TWWHA Tourism Master Plan proposed in the *Draft Management Plan*

### Wilderness and Aboriginal Values

- TICT urges the Tasmanian Government to review the proposed renaming of the Wilderness Zone in the *Draft Management Plan*, and the opportunity to reinstate the term ‘Wilderness’ in the name and management objectives of the proposed ‘Remote Recreation Zone’.
- TICT wholeheartedly supports the *Draft Management Plan’s* proposal for Dual Naming of the TWWHA and individual sites within the TWWHA
- TICT welcomes the greater focus on Aboriginal cultural values, and endorses the provisions for greater Aboriginal custodianship and capacity building in the *Draft Management Plan*

### Visitor Access

- TICT does not support the construction of new public roads within the TWWHA
- TICT welcomes the balanced approach and new opportunities for air access in the *Draft Management Plan*
- TICT does not support the use of personal powered water craft (jetskis) in Port Davey

### Sustainable and Appropriate Tourism

- TICT welcomes the expanded opportunity for commercial accommodation in the *Draft Management Plan*
- TICT recommends the development of clearer guidelines regarding sensitive and sustainable accommodation in each of the TWWHA’s management zones, in order to encourage best practice and safeguard against inappropriate proposals

- TICT recommends that as a critical tool for managing quality, sustainable tourism outcomes across the TWWHA, the Management Plan incorporate mandatory tourism accreditation for all tourism operators licensed to operate in the TWWHA

#### Resource Extraction

- TICT highly values the specialty timber sector in Tasmania, as an important part of the Tasmanian retail tourism sector, and the contribution it makes to the Tasmanian visitor experience.
- TICT does not support further extraction of timber from the TWWHA beyond the practices already permitted under the current Management Plan.
- TICT does not consider it appropriate for any form of mining extraction to be permitted within the Tasmanian Wilderness World Heritage Area

*“The very reasons why a property is chosen for inscription on the World Heritage List are also the reasons why millions of tourists flock to those sites year after year. In fact, the belief that World Heritage sites belong to everyone and should be preserved for future generations is the very principle on which the World Heritage Convention is based.”*

- Francesco Bandarin (UNESCO)<sup>ii</sup>

## Tourism in the Tasmanian Wilderness World Heritage Area

Tourism is the major industry operating and generating income in the TWWHA; equally the TWWHA, and the Tasmanian wilderness more generally, underpins the Tasmanian tourism industry – directly supporting around 10% of tourism businesses in the state, contributing to the development of regional tourism hubs around the TWWHA, and an influential factor in the success of the wider industry through brand and visitor appeal.

### ***As the peak body representing the Tasmanian tourism industry and a key stakeholder in the TWWHA, Tourism Industry Council Tasmania welcomes the opportunity to comment on the Draft Tasmanian Wilderness World Heritage (TWWHA) Management Plan 2014***

There are over 200 tourism businesses with a lease or a license to operate in Tasmania's reserve system. Approximately half of these businesses already operate in the Tasmanian Wilderness World Heritage Area. These businesses are generally small, boutique and labour intensive; offering a wide variety of interpretation and experiences each year to hundreds of thousands of visitors of different backgrounds and abilities, including guided walks, canyoning, caving, rafting, kayaking, mountain biking, cruises and charters, food and drink, scenic flights, wilderness accommodation, wildlife watching, fishing, personalised and coach tours.

In addition, hundreds of tourism businesses operating outside the TWWHA also promote and benefit from the wilderness and its visitor appeal, providing complementary experiences, accommodation, hospitality and transport to those visitors who have come to Tasmania to see, enjoy and learn about the TWWHA and other wilderness areas in the state.

The economic value of the Tasmanian Wilderness World Heritage Area, from the impact of visitor spending alone, was estimated at \$721.8 million in the year ending June 2007 – supporting approximately 5,300 jobs in the state<sup>iii</sup>. Tourism Tasmania research has also shown that 'wilderness' is integral to Tasmania's brand and appeal as a total tourism destination: 'wilderness' is the greatest trigger to influence intention to visit Tasmania, and respondents across market segments consistently rank 'wilderness' as having the highest appeal and being a uniquely Tasmanian experience.

Tasmania's regional economies, especially the West Coast, are some of the most tourism dependent communities in Australia<sup>iv</sup>. It is in these areas, bordering the TWWHA, that the wilderness is often the most important asset and driver for tourism, and where nature based tourism has the most potential to contribute to local social and economic development.

Tourism activities and services, carried out in a sustainable manner, are also compatible with and complementary to conservation aims. Indeed, in many cases, tourism has been an essential factor in successful conservation outcomes in Tasmania.

Ultimately, the majority of tourism operators that work in the Tasmanian wilderness do so because they value our special places, and they share these places with visitors in order to protect them. Successful nature based tourism businesses have provided and continue to offer a viable alternative to unsustainable economic uses of our wilderness areas and assist in arguments for their protection, not least through their continued investment in marketing and promotion of the Tasmanian wilderness.

Furthermore, through sustainable tourism experiences and high-quality interpretation, visitors and the community can come to learn and reaffirm the intrinsic value of our wilderness, and appreciate and advocate for its protections.

Tourism businesses in the TWWHA also provide more tangible conservation support through the lease and license fees paid to the Tasmania Parks and Wildlife Service, worth a significant proportion of the Service's annual budget, with a number also voluntarily raising additional funds and donations for the Service and other conservation bodies. Many Tasmanian nature-based tourism businesses also work collaboratively with the Parks and Wildlife Service to manage and monitor wilderness areas and visitor impacts, and actively participate in hands-on conservation and rehabilitation projects.

*"Unlike other industries and human-driven activities, tourism in protected areas can be a strong positive force – increasing a sense of stewardship and revenues that are vital for the long-term protection of these important conservation areas"*

– Dr. Yu-Fai Leung (IUCN)<sup>v</sup>

## Our Vision

Through engagement with the Tasmanian tourism industry, and consideration of visitors' changing wants and needs, the industry has identified a broad vision for tourism in the Tasmanian Wilderness World Heritage Area:

***"To deliver the most contemporary Wilderness World Heritage experience, offering shared, life changing moments."***

The focus for the future of tourism in the TWWHA is on growing the value of the place at a low volume, in line with seven goals for tourism operators to engage with – assisting to reposition the TWWHA as a tourism destination and deliver reimagined, extraordinary, visitor experiences.<sup>vi</sup>

**Making our customers heroes:** responding to customers' needs, wants, and desires to form attractive, contemporary, wilderness experiences

**Providing personal, hands on experiences:** promoting environmental values in this unique region, from up-close and hands-on adventure experiences to voluntourism and educational opportunities

**Embracing the tourism-conservation partnership:** positioning the TWWHA as a premier conservation destination, providing excellence in interpretation and story telling around the World Heritage values, history and protection

**Sharing Aboriginal stories and heritage:** actively engaging and conversing with Aboriginal peoples, so that visitors can better appreciate the connection to country and the cultural values of this region

**Giving experience providers confidence in new opportunities:** zoning changes, ensuring security of tenure for tourism operators, and improving access, to encourage innovative ecotourism opportunities

**Delivering world's best practice that is measurable:** ensuring a reputation for, and delivery of, quality experiences and best practice environmental sustainability through mandatory accreditation, stronger leasing and licensing conditions, and reference to globally relevant performance standards

**Embracing new markets and communication channels:** building a destination brand, targeting niche markets, using story-telling, linked to a brand strategy and events

To progress our vision and achieve our goals, TICT has also engaged with the Tasmania Parks and Wildlife Service to develop the *Parks 21* agreement. The guiding principle behind *Parks 21* is *"to nurture the parks and reserves, they being a valuable asset in Tasmania's future"*.<sup>vii</sup>

This memorandum, and the strategies outlined within it, aims to facilitate environmentally, socially, and economically sustainable tourism activity and enhance the visitor experience in Tasmania's national parks and reserves (including the TWWHA).

## Our Response to the Draft

Tourism Industry Council Tasmania welcomes this historic and critical opportunity to contribute to the development of a contemporary vision and management plan for the Tasmanian Wilderness World Heritage Area.

In developing our representation, Tourism Industry Council Tasmania has called for comment from individual tourism operators to be incorporated into this submission and worked closely with our representative Board of Directors; TICT has also encouraged operators to also provide their own personal representations directly to this process. Around the drafting of this new Management Plan, TICT and the Regional Tourism Organisations have also consulted extensively with industry over a number of years: through ongoing industry engagement; the regional Destination Management Plan processes; through our regular Nature Based Tourism Operator Forums; the *Parks 21* consultation process, and our *Reimagining the Visitor Experience of Tasmania's Wilderness World Heritage Area* project.

The tourism industry in Tasmania plays a critical role in the conservation, management and visitor experience within the Tasmanian Wilderness World Heritage Area. However, the industry has longstanding concerns about the restrictive and prohibitive approach adopted in current management plans for the TWWHA, and TICT believes this dated approach to tourism in protected areas has constrained the capacity of the industry to fully realise the potential of this area for the Tasmanian community and visitors from around the world. Tourism operators also hold longstanding concerns about the complexity, and difficulty in interpreting, the prescriptions of the current plan that affect their business operations.

TICT welcomes this *Draft Plan*, and its **more contemporary and balanced approach** to managing and presenting both the natural and cultural values of the Tasmanian Wilderness World Heritage Area. TICT supports and appreciates the **greater recognition, capacity and opportunity** it provides for **sustainable, commercial tourism operations** and their role within the TWWHA, along with the clearer, more practical and reader friendly composition and formatting of the *Draft Plan* overall.

TICT endorses the greater recognition of the importance of, the need to coherently plan for, **presentation** of the area's World Heritage values – and the greater attention given to Aboriginal cultural values and their presentation within the *Draft Plan*.

TICT also welcomes a number of practical measures proposed in the plan to support improved presentation of the area; including the much needed updating of the *Interpretation Framework 2007*, which will enhance the effective public provision of quality interpretation and communications regarding the TWWHA.

TICT looks forward to participating in the development of the proposed **Tourism Master Plan** with the Tasmania Parks and Wildlife Service and other stakeholders; and anticipate a more strategic, shared approach to best-practice visitor management and successful marketing of the TWWHA as a destination as a result. TICT urges that the significant body of work already undertaken by government and industry regarding the strategic future of tourism in the TWWHA should be utilised and incorporated into the Tourism Master Plan development process. In line with *Parks 21*, TICT is particularly interested in how tourism and management can better support one another in both conservation and presentation activities, and is optimistic about the inclusion of these considerations in the Tourism Master Plan process.

Tourism Industry Council Tasmania's position on six key issues of concern for our industry in this *Draft Management* require further explanation; TICT's detailed positions and constructive suggestions regarding the naming of the Wilderness Zone, Dual Naming and Aboriginal Cultural Values, Visitor Access, Commercial Accommodation, Quality Assurance, and Resource Extraction are provided in the following pages.

## The Wilderness Zone

***Tourism Industry Council Tasmania urges the Tasmanian Government to review the proposed renaming of the management zones in the Draft Management Plan and the opportunity to reinstate the term 'Wilderness' in the name of the proposed 'Remote Recreation Zone'.***

TICT respects the sensitivities of the Aboriginal communities around the term 'wilderness' and its dominance in public perceptions of the TWWHA, as outlined in the Draft Management Plan. However, as also stated in the Draft Management Plan, "*wilderness is one of the TWWHA's core values. This view is elemental to the sense of place that many people have of the TWWHA and was central in the motivation for many people who were involved in advocating and acting for its protection*". For many tourism operators, and other members of the Tasmanian community, the suggestion that the Wilderness Zone should not be recognised as 'wilderness' represents a loss of focus for its management objectives, and is perceived as a downgrading of the areas they share and present to visitors for preservation as World Heritage 'wilderness'.

Despite some interpretations of 'wilderness' as meaning a landscape empty of human culture, past management has been able to draw a distinction in defining 'wilderness' as '*substantially undisturbed by colonial and modern technological society; and remote at its core from points of mechanised access and other evidence of colonial and modern technological society*'. TICT believes that other initiatives to recognise the World Heritage cultural values of the area, including Dual Naming for the whole World Heritage site, will be more meaningful acts of respect and reconciliation, and better mitigate against the perception of unoccupied wilderness than renaming a management zone would.

The concept of 'wilderness' is also integral to the economic value of the TWWHA for the tourism industry – as a major attraction, brand, and a marketing focus for the state. Although the Draft Management Plan does propose to retain the full name of the Tasmanian Wilderness World Heritage Area while renaming just one zone within it, extensive media coverage and public responses have



shown that even this step is easily conflated with a step away from the 'Wilderness' values and naming conventions of the whole area. Such coverage presents a real risk to the reputation and branding of the TWWHA as a sustainable tourism destination, and on this basis, TICT strongly recommends that the Wilderness Zone naming be retained.

This is a sensitive and complex issue, and it is unfortunate that the values of conservationists, tourism operators and the Aboriginal communities are potentially in conflict over the usage of 'wilderness'. However, on this important issue, TICT encourages the Government to seek a resolution.

## Dual Naming and Aboriginal Cultural Values

***TICT strongly supports the proposal in the Draft Management Plan for Dual Naming of the TWWHA and individual sites within the TWWHA.***

The opportunity for the TWWHA to be known under a dual name, both the English *Tasmanian Wilderness World Heritage Area* and a Palawa name, and to have this dual name recorded officially by the UN World Heritage Committee, is a significant and important opportunity for the state of Tasmania.

This step would be a major act of recognition and mark of respect for the traditional custodians of the wilderness, and promote further steps towards reconciliation in the Tasmanian community. Further, for the tourism industry, the new Palawa name may represent an important branding opportunity to highlight the cultural values of the TWWHA, and perhaps present a unique and more distinctive title internationally, comparable to 'Kakadu', 'Uluru', 'The Amazon' and other renown landscapes.

***TICT welcomes the greater focus on Aboriginal cultural values, and endorses the provisions for greater Aboriginal custodianship and capacity building in the Draft Management Plan.***

The TWWHA meets seven criteria of Outstanding Universal Value under the World Heritage convention; only one criteria must be met for a site to be recognised as World Heritage, and no site in the world meets more values than the Tasmanian Wilderness World Heritage Area. It is important to recognise that the TWWHA could have been listed as World Heritage three times over for its cultural values alone. However, the TWWHA is not as well known or promoted for its global cultural significance.

The tourism industry has identified a serious lack of high-quality public and privately provided tourism experiences and interpretation that appropriately highlight the cultural values of the TWWHA. There is also a clear market demand for Aboriginal stories, culture and heritage to be part of the visitor experience of the TWWHA. It has been gratifying to start seeing a number of Aboriginal tourism operators developing products and entering the market, and still more tourism operators who are keen to work with the Aboriginal communities in recent years. However, there is still a need for substantial time and resources to be invested in Aboriginal tourism and the presentation of Aboriginal cultural values in the Tasmanian Wilderness World Heritage Area.

The potential, outlined in the Draft Management Plan, for the TWWHA to be recognised as a '**Cultural Landscape**' (a combined work of nature and man) under the World Heritage Convention – equal to places such as Ulura Kata Tjuta; along with Dual Naming, and greater attention to the identification, management and interpretation of Aboriginal cultural values could elevate the cultural reputation of the TWWHA internationally, as a globally significant site of unparalleled World Heritage value. Such

significance would undoubtedly also positively impact on the tourism and economic values of the TWWHA for the state of Tasmania and its communities.

TICT recognises that greater trust and respect between government, tourism and the Tasmanian Aboriginal peoples is essential, and will take time to achieve. However, TICT remains genuine in its enthusiasm to work with the Aboriginal communities – such as through the much needed resources and expertise in the new government **‘Cultural Business Unit’** proposed in the Draft Management Plan – to undertake consultation; build connections; raise cultural awareness among tourism operators; invest in capacity building activities for the Tasmanian Aboriginal communities, in order that they manage the interpretation of their own stories, starting, running and growing their own commercial tourism businesses in the TWWHA.

TICT also recognises and supports the Draft Management Plan’s intent to address Aboriginal cultural presentation and other interpretation as part of a comprehensive **‘Tourism Master Plan’** for the TWWHA – to be developed in consultation with the tourism industry, Tasmanian Aboriginal peoples, and other key stakeholders – as a valuable and positive approach for the future of environmentally, socially and economically sustainable tourism in the Tasmanian Wilderness World Heritage Area.

## Visitor Access

### Public Roads

*TICT does not support the construction of new public roads within the TWWHA.*

Existing roads within the TWWHA provide important and frequently used access routes for visitors and land managers. All established roads with such demonstrated value should continue to be maintained to a recognised standard as a critical component of the visitor experience, and TICT would support opportunities to upgrade or enhance existing roads for public use.

The recent additions to the TWWHA include a substantial road network due to past forestry operations. TICT agrees with the Draft Management Plan’s suggestion these roads present a unique opportunity to consider new experiences and presentation for visitors, and it is important that this opportunity for consideration is provided. TICT also however understands the limited resources to maintaining such an extensive road network and accepts that “it is not possible or desirable to retain the full extent of roads within the added areas”.

Although TICT supports and advocates for the use of existing roads for tourism benefit, TICT otherwise takes the position that roads are the most invasive and environmentally disruptive method of human access to the wilderness; and although no new roads are mentioned in the Draft Management Plan, it is nonetheless important to state that TICT does not support the construction of any new roads in the Tasmanian Wilderness World Heritage Area.

### Seaplanes, Helicopters and other Aircraft

*TICT welcomes the balanced approach and new opportunities for air access in the Draft Management Plan.*

The tourism industry has identified strong consumer demand, industry interest and real opportunities for new and improved visitor experiences of the TWWHA from increasing the number and availability of landing permissions for seaplanes, helicopters and other aircraft within the TWWHA.

Already, air access and scenic flights are a significant and popular component of presentation in the TWWHA, contributing to a diversity of visitor experiences, enabling visitors to enjoy the vast wilderness or gain a different perspective of it in a shorter period of time, and also enabling visitors with limited physical abilities to enjoy a quality wilderness experience from the air.

TICT respects that increasing air access is viewed with concern by some user groups, however, the approach taken in the Draft Management Plan presents a careful balance, with strategic and sensible selection of new landing sites, limits on use, and the usual licensing conditions which will minimise conflicts regarding the sonic and visual impacts of aircraft.

The new helicopter and/or seaplane landing sites offer exciting opportunities for new tourism ventures in association with air access, as well as opportunities for repeat and new visitors to experience new and different parts of the TWWHA with minimal on-ground impacts and avoiding demand for unnecessary new roads or access tracks.

### **Personal Powered Water Craft**

***TICT does not support the use of personal powered water craft (jetskis) in Port Davey.***

The Draft Management Plan proposes to permit jetski use in Port Davey; however, TICT is concerned about the effect jetski use would have on the pristine wilderness area of Bathurst Harbour, and the natural serenity this region provides for visitors – and in turn, the impacts this would have on existing tourism businesses in the far south west.

In addition, TICT is not aware of any market demand or operator interest in providing jetski experiences in Bathurst Harbour. Therefore, TICT recommends that jetski use be prohibited in Port Davey, continuing current management practice.

### **Commercial Accommodation**

***TICT welcomes the expanded opportunity for commercial accommodation in the new Draft Management Plan.***

Tourism Industry Council Tasmania welcomes the provisions in the new Draft Management Plan to allow exciting new and innovative proposals for commercial accommodation and associated infrastructure.

Existing commercial tourist accommodation located within the Tasmanian Wilderness World Heritage Area – including the Tasmanian Walking Company's Cradle Mountain Huts along the Overland Track, Par Avion's Wilderness Camp at Forest Lag near Melaleuca, and RiverFly's Wilderness Huts at Skullbone Plains – have demonstrated the ability of small-scale and appropriate accommodation developments to work sensitively and sympathetically within the wilderness.

TICT embraces the opportunity for innovative new accommodation concepts to be considered and tested in the Self-Reliant Recreation and Wilderness (Remote Recreation) Zones, in addition to the Visitor Services and Recreation Zones. This will provide significant and exciting opportunities for the Tasmanian tourism industry to provide high-quality, immersive experiences for old and new markets of visitors to the wilderness, add greater depth to Tasmania's product offering and tourism marketing, generate jobs and income for regional communities, and raise funds and awareness for the conservation of the TWWHA's World Heritage values.

***TICT recommends the development of clearer guidelines regarding sensitive and sustainable accommodation in each of the TWWHA's management zones, in order to encourage best practice and safeguard against inappropriate proposals.***

In order to encourage best practice eco-accommodation operations, and to further safeguard against inappropriate development proposals or exceeding landscape carrying capacities; TICT believes that commercial tourism accommodation developments in the Tasmanian Wilderness World Heritage Area should be assessed against clearer guidelines regarding what constitutes acceptable, sensitive and appropriate infrastructure in each management zone.

TICT notes that in the new Draft Management Plan, any new proposal for tourism accommodation within the TWWHA will, as under the current Management Plan, be required to undergo certain processes before they can be granted a lease for their development. While the Reserve Activity Assessment system, regard for the Management Plan, the objectives of the management zones and reserve classes to play a strong and critically important role in ensuring that only sensible developments proceed, TICT also suggests that new and further guidelines be developed, either as part of or as an adjunct to the new Management Plan.

These guidelines should aim to assist the community and potential proponents in understanding the key characteristics of sensitive, small-scale and low-impact development, and what kinds of accommodation might be considered appropriate by the land manager (Tasmania Parks and Wildlife Service). These guidelines should provide a set of baseline prescriptions, clear criteria, and advice for designing sustainable new tourism accommodation developments, including any associated infrastructure, activities and access considerations.

Guidelines should be issued for each of the four management zones, in accordance with the differing objectives of the zones and expectations for their use. The guidelines should make use of existing global best practice such as the IUCN's Biodiversity Principles for Siting and Design, the Global Sustainable Tourism Criteria and other standards, and consider all aspects of new eco-accommodation developments including:

- Size and/or scale (maximum allowed footprint; maximum allowed occupancy)
- Visual impact and amenity (level of visibility within the landscape, day and night; aesthetics, sympathy with surroundings)
- Sonic impact (minimising any possible disturbance to other park users and wildlife)
- Physical impact (minimising any possible disturbance to vegetation and wildlife, land or marine; impacts on wilderness quality and/or cultural heritage; provisions for removal and site rehabilitation at end of lease)
- Sustainable construction (sustainability of materials; local sourcing of materials where possible; build methods, access and impacts)
- Sustainable operations (water use and management; energy sources and use; waste minimisation, removal and treatment)
- Contribution to site management (biosecurity controls; area rehabilitation plans; monitoring capacity)

***TICT does not support new public roads to provide access to any new accommodation developments.***

As stated above in relation to Access, TICT does not support the construction of any new public roads in the Tasmanian Wilderness World Heritage Area. Proposed methods of access and related infrastructure should be a critical component in assessing any new accommodation development proposals.

## Quality Assurance

***TICT recommends that as a critical tool for managing quality, sustainable tourism outcomes across the TWWHA, the Management Plan incorporate mandatory tourism accreditation for all tourism businesses licensed to operate in the TWWHA.***

***The Management Plan should also actively encourage and recognise tourism operators engaged in conservation management programs and initiatives.***

The Draft Management Plan references the need to provide “high-quality experiences” and facilities that “match the expectations of visitors to the TWWHA”. However, there is no clear, strong mechanism outlined in the Draft Plan for the Tasmania Parks and Wildlife Service to effectively manage the quality of service, operation and interpretation provided by commercial tourism operators.

TICT notes the importance of ongoing community and visitor satisfaction surveys as a key component in quality assurance in the TWWHA. While the Draft Plan also suggests that staff and operator training and accreditation will be considered in the proposed Tourism Master Plan, TICT strongly recommends that accreditation be established in the Management Plan itself, as a critical tool for managing quality, sustainable tourism across the TWWHA.

It is already mandatory for commercial tourism operators to achieve a recognised tourism accreditation (which includes attention to environmental sustainability) – such as the Australian Tourism Accreditation Program, EcoTourism Australia Accreditation, EarthCheck Certification – within the first twelve months of being granted a PWS Commercial Visitor Services license or lease to work in Tasmania’s reserve system. TICT strongly supports this approach by Tasmania Parks and Wildlife, and under *Parks 21*, both organisations will work together to increase take up and compliance with accreditation requirements.

Accreditation supports a higher quality of business management, customer service, interpretation, environmental concern, and compliance with state legislation and advice; accreditation supports the development of environmentally, socially and economically sustainable tourism businesses. Accreditation is also already widely accepted by industry and the land manager as a minimum standard and a key tool for protecting the brand and quality of experience provided in our shared asset, the TWWHA, and the whole wilderness reserve system.

Therefore, TICT suggests that the proposed consideration of accreditation has already occurred to a significant extent. The direct inclusion of mandatory accreditation, and its role in ensuring quality and sustainable tourism outcomes, in the Draft Management Plan would give greater support to management and industry in improving take up and compliance with accreditation in line with the concept of ‘responsible visitation’ under the World Heritage Convention.

## Resource Extraction

***TICT highly values the specialty timber sector in Tasmania, as an important part of the Tasmanian retail tourism sector, and the contribution it makes to the Tasmanian visitor experience.***

Tourism Industry Council Tasmania supports a vibrant, sustainable and responsible specialty timber sector in Tasmania, and acknowledges that under current Tasmanian legislation, the extraction of native timbers from regional reserves and conservation areas is permitted.

The current Tasmanian Wilderness World Heritage Management Plan, however, does not allow for commercial harvesting of timber in the TWWHA except for the special arrangement with Forestry Tasmania for the salvage of Huon Pine logs from the shoreline of Macquarie Harbor.

The Draft Management Plan's proposal to permit extraction of special species timber in certain areas is a significant departure from the current Management Plan

The areas where timber extraction may be permitted (the overlap of the Recreation, Self-Reliant Recreation, and the Wilderness Zones with Regional Reserves and Conservation areas) constitutes up to 10% of the total area of the TWWHA.

TICT questions the appropriateness and need for this departure from current management practice and its potential impact on the Tasmanian Wilderness World Heritage brand, and Tasmania's reputation, by permitting what is perceived as 'logging' within the TWWHA. TICT notes the extensive media coverage this particular component of the Draft Management Plan is generating, and is concerned about the risk to the reputation and brand of the TWWHA and those tourism operators who leverage and rely on this image for their business.

TICT recognises the value of specialty timber for the state as a component of the retail sector and tourism industry; TICT understands the uncertainty caused to this sector by the Tasmanian Forest Agreement and subsequent extensions to the TWWHA. We are concerned, however, about the further scrutiny and potentially damaging attention that would be brought on this sector from such a contentious outcome in this Draft Management Plan.

***TICT does not support further extraction of timber from the TWWHA beyond the practices already permitted under the current Management Plan.***

Any timber extraction should continue to be contained to appropriate areas and undertaken through a highly controlled salvage process consistent with current practice. We do not believe it is appropriate for industrial forest harvesting to occur within World Heritage listed areas.

***TICT does not consider it appropriate for any form of mining extraction to be permitted within the Tasmanian Wilderness World Heritage Area***

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<sup>i</sup> IUCN 2015, 'Tourism and Biodiversity', International Union for the Conservation of Nature, <[www.iucn.org/about/work/programmes/business/bbp\\_work/by\\_sector/tourism](http://www.iucn.org/about/work/programmes/business/bbp_work/by_sector/tourism)>

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<sup>ii</sup> Francesco Bandarin 2002 (at the time Director, UNESCO World Heritage Centre), 'Foreword', in Arthur Pedersen: *Managing Tourism at World Heritage Sites: a practical manual for World Heritage Site managers*, UNESCO World Heritage Centre

<sup>iii</sup> Sally Driml 2010, *The Economic Value of Tourism to National parks and Protected Areas in Australia*

<sup>iv</sup> Tourism Research Australia 2011, Survey into the Economic Importance of Tourism in Australia's Regions

<sup>v</sup> Dr. Yu-Fai Leung 2014 (Chief Editor of IUCN report *Tourism and Visitor Management in Protected Areas: Guidelines for Sustainability*), 'Sustainable tourism in protected areas can be critical for their survival', IUCN World Parks Congress media release 14 November, <[www.worldparkscongress.org/drupal/node/179](http://www.worldparkscongress.org/drupal/node/179)>

<sup>vi</sup> EC3 Global, TRC Tourism and Tourism Industry Council Tasmania 2014, *Reimagining the Visitor Experience of Tasmania's Wilderness World Heritage Area: Ecotourism Investment Profile*

<sup>vii</sup> Tasmania Parks and Wildlife and Tourism Industry Council Tasmania 2014, *Parks 21*