



World Heritage Centre  
UNESCO  
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France

By e-mail: [wh-info@unesco.org](mailto:wh-info@unesco.org)

28 February 2013

Dear Mr Rao

**Re: IFA submission on the proposed extension to the Tasmanian Wilderness  
World Heritage Area**

The Institute of Foresters of Australia (IFA) makes the following submission with respect to the request for extension to the Tasmanian Wilderness World Heritage Area made by the Australian Commonwealth Government (the State Party).

We note the Decision 32COM 7B.41 of the WHC in 2008. In that decision there was reference to:

*3 (a) "...involvement of all relevant stakeholders to monitor, assess and manage the ecological integrity of the TWWHA and adjoining reserves..."*  
*and*

*3 (b) "...submit a proposal for modifying the boundaries of the TWWHA to include the adjacent 21 areas of national parks and state reserves, which are currently not a part of the inscribed World Heritage property but are covered by its management plan."*

We also note the report of the Reactive Monitoring Mission (15 to 20 March 2008) which stated in its summary of main recommendations (page 5):

*"Considering the representation of old growth forest, including of the tall Eucalyptus forest within the area covered by the TWWHA and its management plan, as well as in the other reserves in Tasmania, and the fact that potential threats from production forestry activities are well managed, the mission does not recommend any change to the boundaries of the property to deal with such threats. However, it recommends that boundaries of the TWWHA be adjusted to include within it the 21 areas of national parks and state reserves, which are currently not a part of the inscribed property but are covered by its management plan."*

The IFA supports the addition of the 21 adjacent areas amounting to 23,800 ha as described in 3 (b) above as minor extensions which resulted from the Tasmanian Regional Forest Agreement signed between the Tasmanian and Australian governments in 1997 and further enhanced by the Tasmanian Community Forest Agreement in 2005.

These extensions have been implemented in the period 2010 to 2012. The current area of the TWWHA is 1,411,323 ha which is nearly half of the approximately 3 million ha of conservation reserves in Tasmania, which amount to 47% of the total land area of the State.

It has come to our attention that the Australian Government (the State Party) has submitted a request to substantially increase the area of the Tasmanian Wilderness World Heritage Area. While this has been submitted as a minor extension the IFA is concerned that it is not minor and may have a major socio-economic and biodiversity conservation impact which has not been properly assessed. The proposal before you amounts to an addition of up to 170,000 ha, an addition of about 2.4% of Tasmania's land mass and an increase in the size of TWWHA by close to 15%.

In direct contradiction of the process requested in decision 3(a), there has been very little, if any, consultation with relevant stakeholders on the areas proposed for extension. In fact, the boundaries are still not decided to this day and therefore impacts on public and private landholders are not clear. There is no "management plan" for the proposed extensions and no opportunity to consider what the short and long term effects on forests and other vegetation categories will be. Furthermore, many of these areas have been subject to human exploitation for thousands of years, including more recent and severe disturbance over the past 210 years since European settlement. These human activities are now an established part of the social, economic and environmental 'landscape'.

There has been a process known as the Inter Governmental Agreement (IGA) which involved the Tasmanian State and Australian Commonwealth governments facilitating negotiations between a small number of powerful vested interest groups. These included eNGOs and forest industry representative organisations.

There was little if any consultation or consideration of the views of a professional body such as the Institute of Foresters of Australia. As far as the IFA is aware there was no consultation with communities likely to be directly impacted by the extensions to the boundaries of the TWWHA.

The IFA submits that these areas are important contributors to the livelihood and lifestyle of communities that live nearby and throughout Tasmania. Addition of these areas to the TWWHA would severely compromise those livelihoods and community activities. In addition the IFA is not confident that addition to the TWWHA would result in an improved approach to forest management, biodiversity conservation, micro-economic reform or social cohesion. In fact, on all four counts, the IFA is of the view that the outcome could be worse. The request to include these areas in the TWWHA reflects a lack of consideration of more modern approaches to conservation management on a landscape scale rather than discreet patches which are zoned "production" or "protection" with very little overlap.

The IFA is also concerned that a great deal of the government sponsored investigations behind the IGA were of dubious quality. There is anecdotal evidence of selective reporting, manipulation of results and opinions of leading experts and rejection of expert opinion or analyses which differed from the views of those commissioned to provide reports to the IGA process. Whether this is true or not, the IFA is concerned about the lack of scientific rigour and the haste with which many reports were prepared.

The IFA has also, for some time, been concerned about the lack of funding provided for appropriate management and research in Australia's conservation reserves. Successive Commonwealth and State governments have emasculated land management agencies particularly in relation to active management of anything other than fire-fighting and emergency management of major catastrophes. It can be clearly demonstrated that active forest management including harvesting and regeneration activities and a well maintained road network has contributed to protecting the TWWHA from fire. In addition the State forest management company, Forestry Tasmania, has until recently, contributed in the order of \$3 million per annum to forest research; the single biggest contributor in the State by a large margin. The Tasmanian Forest Practices system which is overseen by the independent Forest Practices Authority is a world leader in implementation and management of prescriptions aimed at conservation and protection of biodiversity, cultural heritage, geomorphology, hydrology, landscapes and soil protection across all land tenures.

The IFA respectfully requests the WHC to reject the current proposal and to call for the State Party to provide information on how the proposed additions to the TWWHA will meet the aspirations of the Tasmanian community for a sustainable lifestyle where there is an appropriate balance between social, environmental and economic objectives, before further extensions are considered.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Alison Carmichael', written in a cursive style.

Alison Carmichael, CEO