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SUBMISSION REGARDING WILD DRAKE PTY LTD 2018/8177

Tourism and Recreation/Halls Island/Tasmania/Halls Island Standing Camp, Lake Malbena, Tasmania

The National Parks and Wildlife Council (NPWAC) has the responsibility to advise both Commonwealth and State Governments on the management of the Tasmanian Wilderness World Heritage Area (TWWHA).

NPWAC has reviewed the additional information provided to support the Hall's Island proposal out-of-session. The proponent has provided a considerable amount of additional information to support the application and provides a better basis for an assessment of the proposal. The proponent has acknowledged many of the concerns raised through the original referral, including flight plans, sensitive vegetation, fire risk and biosecurity implications. The proponent (through the consultant's vegetation report) acknowledges that there are several listed plant communities and one listed plant species (*Ptherosphaera hookeriana*), as well as fire sensitive vegetation (MSP, RKP, RSH).

The proponent does not adequately address the issue of exclusive private commercial use of an area in the Tasmanian Wilderness World Heritage Area; the erection of permanent structures masquerading as standing camps; or the impacts of regular helicopter access and potential conflict with other users of the TWWHA.

The risk of fire

NPWAC rates fire as the highest threat to the TWWHA's Outstanding Universal Values.

While the documentation specifies that gas or electric cooking and heating will be used, there needs to be a clear statement that no open or wood-fuelled fireplaces will be allowed (is a wood fireplace for amenity purposes excluded with the current wording?), due to the extreme fire sensitivity of the vegetation and the likely impacts of nearby firewood collection.

Similarly, if helicopters are allowed, those with backward/downward facing exhausts are no longer used by PWS in montane areas in the TWWHA, due to 'burn scars' being inflicted on the vegetation and a possible ignition source - such restrictions should be applied to any helicopters servicing the site.

Impact on sensitive and/or threatened plant communities

The additional documentation specifies that routes/tracks/works should avoid Sphagnum bogs/rainforest communities, but if that's not possible then a perforated boardwalk will be constructed; the nationally listed plant species (*Pterosphaera hookeriana*) should be avoided but if necessary, a threatened species permit obtained to remove individual(s); several significant trees (including *Eucalyptus gunnii* ssp *gunnii*) should be avoided; conifers should be avoided - but all of these species/communities do occur within/adjacent to the proposed greater footprint and are potentially at risk. To ensure that the risks of disturbance and damage to these natural values is minimised, it would be appropriate (as recommended in the consultant's report) to have a botanist on site during the proposed construction phase.

The additional documentation acknowledges the need for strict biosecurity measures for both helicopters and clients - this is a potentially significant risk to the area and should include some sort of accreditation to ensure that DPI/PWE/PWS standards are met by helicopter pilots, workers and clients.

As mentioned in our previous comments, the patterned mires are identified as an outstanding value of this area and should be completely avoided as they are very sensitive to trampling.

Standing Camp

Only standing camps are permitted within the Self-Reliant Recreation Zone (2016 TWWHA Management Plan, Table of Use, 79). It is understood that this standing camp was assessed against the current (2006) PWS standing camp policy as a type C camp (permanent). However, NPWAC has previously expressed its concern regarding the inadequacies of the current policy and its potential for misuse to construct permanent buildings in the TWWHA and other national parks.

Irrespective of this, the proponent does not address the fundamental concern that the proposal is for a development with several buildings, not a 'standing camp'. A structure of the type proposed cannot be considered as a standing camp and is incompatible for the Self-reliant Recreation Zoning.

In the document MNES p. 18, the proponent states that the standing camp will be 'rested' from June-September (i.e. over winter) - this is not a time when natural vegetation recovery can occur and is not supported by PWS and DPI/PWE data on the time needed for recovery from trampling or camping. This appears to be a pretence at suggesting that the proposed buildings are a 'standing camp' that is not accessed all year. However, this is undermined by the next statement that up to 5 commercial trips (a total of 20 days) may run over this 'resting' period.

Helicopter access

NPWAC are concerned about the inadequacies in the current legislation and policy framework in Tasmania relating to the use of airspace generally and helicopters in particular, over national parks and wilderness areas. It is concerned that without adequate consideration, precedents will be set that will degrade the World Heritage values of the TWWHA. NPWAC notes that these issues have been addressed, at least in part, in other jurisdictions (e.g. Queensland, New Zealand and USA) and should be the subject of robust policy development in association with the current development of a Tourism Master Plan for the TWWHA.

The proposed landing site (to the east of Halls Island), Lake Malbena and Halls Island is within the Self-Reliant Recreation Zone but abuts the Wilderness Zone on the shoreline of the western half of the lake (2016 TWWHA Management Plan, Map 24).

While the current Plan permits commercial landings at a maximum of five (5) sites in the Self-Reliant Recreation Zone, the use of those flights to transport visitors is not consistent with the concept of self-reliant recreation. NPWAC is of the view that helicopter access other than that required for the purpose of servicing any approved standing camp is incompatible with the concept of a Self-reliant Recreation Zone. As mentioned in our previous submission, recreational fishers have contacted NPWAC members to express opposition to this type of development and in particular, helicopter access to the wild fishery. Lake Malbena is understood to be between two high quality wild fishing sites where the visitor experience will be seriously impacted by regular helicopter activity.

The preferred flight path is over Lake Ina - a particular drawcard in this part of the Central Plateau, and something that is likely to impact the recreational enjoyment of individuals.

These comments should be read in conjunction with the previous NPWAC submission on this project. NPWAC does not support this project progressing at this time and reiterates that contentious projects such as this should not be considered until there is an agreed framework to guide assessment. PWS is only in the initial stages of a Tourism Management Plan for the TWWHA that should include a well-developed policy on air access for tourism purposes to guide such assessments.

Malcolm Wells
Chair NPWAC

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