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Senate Standing Committees on Environment and Communications
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SUBMISSION - AN INQUIRY INTO THE NATURAL WORLD HERITAGE VALUES OF THE TASMANIAN WILDERNESS WORLD HERITAGE AREA MINOR BOUNDARY EXTENSION AND RELATED MATTERS.

We thank you for the opportunity to provide a submission on this important matter, and commend the establishment of this inquiry. We defer to our colleagues with more established in relation to natural values comments in relation to the Terms of Reference a-e and restrict our submission to 'f: any related matter'. Any assessment of World Heritage values and the current proposal for a boundary modification in the TWWHA cannot be undertaken in isolation of the significant cultural heritage values related to the WHA and its surrounds.

Australia ICOMOS is a non-government, not-for-profit organisation of professionals dealing with cultural heritage places, formed as a national chapter of the International Council on Monuments and Sites (ICOMOS) in 1976. Australia ICOMOS' mission is to lead cultural heritage conservation in Australia by raising standards, encouraging debate and generating innovative ideas. The Australia ICOMOS membership currently consists of over 500 members. ICOMOS is one of the statutory advisory bodies to the World Heritage Committee. For further background please go to australia.icomos.org

Our comments have been prepared with the input of Australia ICOMOS members with specific expertise in relation to the Tasmanian Wilderness World Heritage Area (TWWHA) and with World Heritage. These comments are in line with issues raised consistently over the last decade, and also refer to our contribution to the UNESCO World Heritage Centre 2008 reactive monitoring mission and subsequent reports in relation to the TWWHA.

The proposed boundary modifications are a matter of some concern for Australia ICOMOS.

1. While we had concerns that the 2013 proposed boundary modification did not include an assessment of cultural values, the 2013 decision has more by accident than design provided for the inclusion and hence protection of some places of significant cultural value – noting that this does not diminish the requirement for the cultural values assessment that was agreed to by the Australian Government at Phnom Penh (following Decision 36COM 7B.36).
2. Australia ICOMOS believes there is a strong possibility that cultural values will be found in the extended property area, and in areas close to but outside the current boundary, which will enhance the Outstanding Universal Value of the TWWHA.
3. Identifying such values is an obligation under Article 4 of the World Heritage Convention, and Australia is of course a signatory to the Convention.

4. Our understanding of the Terms of Reference of the Cultural Values Assessment proposed by the Australian government in 2013 is that it will only address cultural values within the boundaries of the World Heritage Area. If the boundary is decreased it will exclude the assessment of sites that are known to have cultural significance that are now within the 2013 boundary. This is unacceptable. We note that in relation to cultural values the Australian Government submission to UNESCO (p. 5) states 'the current proposal retains many of these important features within the property'. The corollary is that there are others that will not be retained if the boundary is reduced. One of these is Nanwoon Cave, which has been identified as having significant heritage values, in the new Florentine River Regional Reserve (Mount Wedge – Upper Florentine Section). Other areas to be excluded include those with significant cultural values that were argued for inclusion in the 2008 Mission report. These include the Navarre Plains area (Upper Derwent Section), and the Recherche Bay West area (Recherche Section), which is part of the highly significant associative cultural landscape related to the 1790s D'Entrecasteaux Expeditions and contact with Tasmanian Aboriginal People.
5. Notwithstanding where the boundaries finally fall, the Terms of Reference are flawed and the Australian government should be requested to undertake a cultural assessment that follows best practice and addresses cultural values as they are identified within a landscape and land use approach. The assessment cannot and should not exclude the adjoining land. We understand there are already known sites of cultural significance that lie close to but outside the current boundary, for example Nunamira Cave and Beginners Luck Cave. In this process Australia ICOMOS supports full consultation with the Tasmanian Aboriginal community.
6. The result of the cultural values assessment should allow for the possibility that the boundaries may need to be extended again to include identified cultural attributes that contribute to the Outstanding Universal Value of the TWWHA.
7. As the Australian Government is to submit a progress report on this assessment of cultural values at the 39th session of the World Heritage Committee in 2015 it is premature to be proposing any modification before that time. The evaluation of cultural values is a priority and no boundary modifications should be considered until that report is provided.
8. We are alarmed that this proposal by the Australian Government fails to respect that due process was followed by the World Heritage Committee and that Outstanding Universal Value has been established as the prerequisite for the decision to support the 2013 Boundary Modification. We hence query how the Australian government states it believes the excision of identified areas from the property will enhance the credibility of the World Heritage listing. The opposite seems more likely.
9. One of the drivers identified by the Australian government is the assertion that degraded logging coupes will be removed. This appears to ignore that one of the primary objectives of the current TWWHA management plan is 'to identify, protect, conserve, present and, where appropriate, rehabilitate the world heritage and other natural and cultural values of the WHA'. The potential for rehabilitation should be addressed as a step prior to removing degraded areas.
10. Notwithstanding the above, we are equally concerned that the proposal appears to be driven by political and economic imperatives arising from the recent change of Federal government in Australia, and by ongoing lobbying in relation to the proposed changes to the way logging is managed in the State of Tasmania. This is made clear in points 5 and 6 of the Australian Government submission to UNESCO.
11. We have not been able to gain a reassurance that the \$500,000 committed last year by the Federal Labour government to undertake the cultural assessment will be forthcoming under the Federal Coalition government.
12. We understand that there are concerns that this money will not be spent directly on assessing cultural values. We urge that the disposition of the funds should be open to public scrutiny and in particular that decisions as to its allocation be undertaken in consultation with the Tasmanian Aboriginal Community.
13. There is an assertion made by the Australian Government in its submission (p. 5) in 2013 that the World Heritage Committee was not aware that a number of communities and landholders whose properties adjoin the revised boundary did not support the extension and did not feel they had adequate opportunity to comment on the proposed change. If this is indeed the case then the potential for negotiated management would seem a more viable option than an argument to reduce the boundaries. There is no indication that the Australian government has provided an improved

- level of consultation in relation to the current proposal, and it seems equally likely that there are those who supported the 2013 boundary extension who feel they have lacked the opportunity to object to the current proposal before it was submitted to the UNESCO World Heritage Centre.
14. The TWWHA management plan is currently under review. While we do not speak for the Aboriginal community, we understand there is considerable frustration that the majority of the initiatives relating to Aboriginal culture, heritage and management involvement that were included in the 1999 plan have not been realised. The lack of mechanisms for co-management and the identification and protection of cultural values remain of concern.
 15. There are concerns that the timeframe and available resources for the review are constrained. The review is due to be completed in October 2014, which clearly will not allow for consideration of the proposed cultural assessment and resolution of issues that may arise in that process – including appropriate co-management arrangements.
 16. The consultation process for the review is based on formal public consultation and does not allow for engagement on specific community issues and options. This is no doubt driven by the timeframe, which is another reason to propose that the timeframe be extended. This will ensure a sound process and an opportunity to responsibly understand and address the values and issues.
 17. There is an ongoing lack of cultural heritage expertise within both the Tasmanian Parks & Wildlife Service and Forestry Tasmania. As the Parks and Wildlife Service has responsibility for the management of the TWWHA, this is compounded by the lack of personnel with expertise in managing Aboriginal heritage. The enhancement of expertise to protect archaeological sites and Aboriginal heritage within and adjacent to the TWWHA was one of the main recommendations in the 2008 joint monitoring mission and little to nothing has resulted subsequently. We understand that financial resourcing for the activities of the Parks and Wildlife Service have been reduced considerably, however the Australian and Tasmanian governments should be urged to address this failing as a matter of urgency as it does not meet the state party responsibility for management of Outstanding Universal Value under the World Heritage Convention and Operational Guidelines. This current gap in available expertise and the limitations of the review process have the potential to further compromise the outcomes in a revised management plan.
 18. Given the significant cultural values already identified in the TWWHA and the certainty that these will be enhanced by further assessment, we suggest it would be timely for the Australian Government to revisit the TWWHA inscription as to whether it should not be more appropriately considered as a World Heritage cultural landscape, and that a comprehensive assessment of cultural landscape values is an aspiration of the Tasmanian Aboriginal Community.

I hope the above is of assistance. If you require any further information please do not hesitate to contact us.

Yours sincerely

Elizabeth Vines OAM,
President, Australia ICOMOS