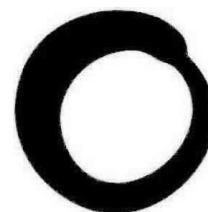


**Friends of the Earth
Australia**



Box 222 Fitzroy,
Australia 3065;
Ph: 61 3 9419 8700
Fax: 61 3 9416 2081
Email: foe@foe.org.au
web: foe.org.au
ABN No. 18110769501

Committee Secretary
The Senate Standing Committee On Environment and Communications
References,

Inquiry into the Tasmanian Wilderness World Heritage Area

PO Box 6100
Parliament House
Canberra ACT 2600

ec.sen@aph.gov.au

Inquiry into the Tasmanian Wilderness World Heritage Area (TWWHA)

Friends of the Earth Australia is a national, membership based environmental organisation which has been active in Australia for 40 years. We are active in more than 70 countries, with around 5,000 local branches and 2 million individual members and supporters. We welcome the opportunity to offer some comments to this Inquiry.

In June 2013 the World Heritage Committee added an 123,650 hectares to the Tasmanian Wilderness World Heritage Area (TWWHA). On the 1st February the Australian Government applied to the World Heritage Committee to withdraw 74,000 hectares from this listing.

More than 90% of the forests that the Australian Government has applied to remove have never been logged.

If the de-listing is allowed, this will have a substantial negative impact on environmental protection in Tasmania, and can be expected to negatively

impact on the local economy via impacts on tourism. More broadly, it will damage Australia's international standing in matters of environmental protection.

An argument commonly used by the Australian government when it comes to environmental protection is that a country must have a strong economic base before being able to protect the environment. As stated by the Prime Minister in an address to the National Press Club in 2013, Australia "needs a strong economy to be sustainable." The argument goes that, with increased economic activity comes greater wealth and hence the ability to protect the environment.

If we are to take this argument at face value, then wealthy nations with advanced economies like Australia should be leading the way globally on matters of environmental protection. If a country like Australia seeks to reduce existing environmental protections through de-listing of high conservation ecosystems, this would set a negative example to other nations in the world.

KEY POINTS

There are a range of compelling reasons why this proposal to delist areas from the TWWHA should not be allowed to proceed.

Protecting ecological integrity

The areas that the Federal Environment Minister Mr Hunt seeks to de-list contain some of the world's most pristine temperate forests, including some of the tallest hardwood forests on Earth.

The inclusion of an additional 123,650 hectares creates a World Heritage Area (WHA) boundary which is based more strongly on ecological considerations, which can be expected to reduce the potential impacts of wildfire and possible migration of invasive species. The previous boundary had long been criticised for being a 'political' rather than 'ecological' boundary.

The great majority of what is proposed to be excised from the TWWHA has not been previously disturbed through commercial logging activity. It appears that the un-disturbed area composes roughly 90% of the area in question. According to Peter Hitchcock [i], only a small area – estimated as being between 5 and 6 per cent of the areas proposed to be excised - have been logged since 1960. These small areas are continuous with the adjacent intact forests.

The World Heritage Committee are aware of the presence of these areas with past disturbance and approval of the minor boundary modification in 2013 was with this understanding. The existence of past disturbance does not mean that a site should not be listed, or that it no longer has conservation value. Broader ecological issues must be considered in making decisions about specific sites because of the potential impacts on landscape scale management.

The proposal to withdraw these forests from TWWHA directly threatens adjacent intact ecosystems of 'outstanding universal value'.

The minor boundary addition that was made to the TWWHA in June 2013 remedied what had been a significant problem with the boundary of the TWWHA. It had been based primarily on a perceived political imperative to privilege logging over ecological conservation and management. In June 2013 the protection of the additional tall eucalypt forest, as well as adding an additional ecological dimension to the TWWHA, made a significant contribution to maintenance of a north-south connectivity in the eucalypt ecosystem.

The boundary extension increases the extent of wet eucalypt forests within the WHA property and will enhance the connectivity between its tall eucalypt forest and rainforest, as well as drier and more open systems in the adjoining areas.

Additional important habitat for rare and threatened species such as the endangered wedge-tailed eagle and the Tasmanian Devil are also included in the boundary extension.

A process established by the Australian and Tasmanian governments to independently verify the conservation value of natural forests identified by environmental non-government organisations (ENGOS) was undertaken in the nomination process and the results of these expert studies were made public in March 2012.

The Independent Verification Group (IVG) reports found that significant connected areas of tall eucalyptus forests exist within the new boundary. New information obtained as part of the verification process substantially increased understanding of the global significance of the tall eucalypt forests contained within these areas and reinforced the need for their inclusion within a revised World Heritage area.[i]

New ecosystems and landscapes protected

In the 2013 extension to the TWWHA some glacial landforms and alpine and sub-alpine environments were listed, as well as the tall forests described above.

The new boundary increases the representation of glacial features and processes in the World Heritage Area.

The previous boundary excluded a significant section of karst landscape, and also cultural features of the landscape that are of universal value.

Protecting giant trees

The Federal Government has applied to remove areas containing the world's tallest flowering plants (*Eucalyptus regnans*). A significant number of large, mature trees are located in the Picton and Upper Florentine valleys. [ii]

Amongst angiosperms these tall trees are the most extreme example of gigantism in the plant kingdom.[iii]

Although very tall trees are also found on mainland Australia, the tallest trees are presently found in Tasmania.[iv]

There were 58 Giant Trees added to the TWWHA when the new boundary was accepted in 2013. We understand that the Liberal Government propose to remove 18 of these giant *Eucalyptus* trees.

A corridor of globally significant tall *Eucalyptus* forest

With the *eucalyptus* genus having a global diversity of more than 800 species, the tall *eucalyptus* forest ecosystem is arguably the most superlative expression of this genus. Remnant tall *eucalypt* forests in Tasmania are concentrated in a tract extending from Recherche Bay, near the southern tip of the state, to the Upper Derwent catchment in central Tasmania. [v] Some outstanding tracts of forests were included in the addition to the TWWHA in 2013, for example in the Upper Derwent, Weld River and the Huon-Picton catchments. The Liberal Party proposes to remove part of these tracts, including the Upper Derwent, Weld River and Picton.

The tall *eucalyptus* forests that were added in June 2013 to the TWWHA, form a near continuous connected ribbon of forest extending for more than 180 kilometres. The continued connectivity of these forests would be assured after decades of incursions by logging operations and associated roading. This will allow for ongoing ecological processes, the proposal by the Liberal Government will remove a large majority of this corridor.

It is hard to overstate the difficulty of creating large and continuous protected areas of *eucalyptus* forests in the temperate zones of Australia because of the widespread nature of historical land clearing and more recent industrial logging. A proposal for a 'sea to snow' megalinkage (the East Gippsland Forests National Park) has been put forward which would join up the six existing national parks in the south eastern corner of Victoria to form a 'super' national park. This was, in turn, modelled on the example of New South Wales where, in 1997, five pre-existing national parks were merged and extended to create the South East Forests National Park.

What is different about the TWWHA to these examples is that the belt of tall, wet *eucalypt* forest exists within a largely unmodified landscape, with the new areas of protected forests merging into a range of ecosystems to the west, north and south west. When we consider how little is left of tall *eucalypt* forests that pre date European colonisation across south eastern and south western Australia, the belt of tall *eucalypt* forest is relatively limited in size and hence in great need of protection.

The global significance of a connected area of tall eucalypt forests, albeit involving some restoration, would add a major new dimension to the TWWHA. [vi]

Endemic, primitive relictual species and rare and threatened species

The addition in June 2013 included species that are endemic to Tasmania, including species that are Gondwanan in origin, nationally listed threatened species, and also one IUCN listed species.

Further information on some of the forests threatened by the proposal to de-list

All areas identified for de-listing are of intrinsic value on their own terms as well as because of their contribution to the overall integrity of the reserve system at a landscape level.

Cockle Creek – Recherche – Hastings

The Recherche section includes valleys and plains adjacent to ranges that preserve evidence of glaciations. The forests in this section comprise mostly forested hill slopes, foothills and some coastal plains. The proposed addition, while having some significant impacts from logging and associated roading in recent years, is partly within identified wilderness areas and has potential to recover from this disturbance. [viii]

This tract of eucalypt forests comprises the largest of the two southernmost occurrences of eucalypt forest in Australia. It is the important final component of the corridor of tall eucalypt forest that extends down the eastern side of the old boundary. It encloses and helps to protect fragile alpine environments in the TWWHA.[ix] The eucalypt forests of this narrow lowland corridor are an integral part of a still existing natural connectivity of tall eucalypt communities. [x]

The natural diversity of this small forest complex is at the southern latitudinal limits of the Australian eucalypt and rainforest flora and fauna. The globally significant eucalypts here can be expected to be of enduring scientific interest, especially given the historic research conducted by French scientists in this region in 1792 and 1793.

This area provides the best opportunity to capture the full range of elevation values in the TWWHA—of significant benefit to the ecological function and integrity of the TWWHA and particularly important to assist in adaptation to climate change. [xi]

Hastings – Esperance – Hartz

This section contains rainforest, tall-eucalypt forests and the balance of the Hastings Caves karst system. The Federal Government proposes to remove all the forests of the Hartz – Hastings.

In the June 2013 addition to the TWWHA, lower altitude old-growth tall eucalypt forests with high scenic qualities and continuous with the upper forested slopes of mountains such as Adamsons Peak and the Hartz Mountains were added. These forests are part of the contiguous band of tall eucalypt forest that were outside the eastern edge of the original WHA property. Their inclusion extended the altitudinal range of this ecosystem and further added integrity to the TWWHA. [xii]

The post June 2013 section of boundary of the TWWHA between Hastings Caves in the south and Hartz National Park in the north epitomises the boundary deficiencies of much of the eastern boundary of the TWWHA. The entire length of this section of boundary was defined by a contour, mostly on steep slopes. The boundary was an artefact of an earlier period where boundaries were drawn for political expedience rather than capture of important conservation values, ecological processes or manageability.[xiii]

Picton – Huon – Weld

The proposed removal of areas from the TWWHA, includes the entire region of the Picton Valley that was added in June 2013 and a large section of the Lower Weld Valley. The threatened forests of the Weld Valley, along with the Picton and Huon Valleys were identified in the independent verification process as being collectively part of the largest single tract of tall eucalypt forest ecosystem remaining in Tasmania. [xiv]

This area is home to possibly the highest recorded fungi diversity in the world and would make a significant contribution to protecting globally significant populations of ancient, relictual fauna. [xv]

The Picton, being a shorter valley than the Weld and Huon Valleys, is almost a 'blind valley' hemmed in by alpine and rainforest communities on three sides so the pattern of eucalypt and rainforest communities and their interactions are different to the Huon and especially the Weld. These characteristics are illustrative of the substantial ecological diversity evident in the tall eucalypt and rainforest communities in the 'Three Valleys'. [xvi] The Picton Valley has experienced various episodes of glaciation, at different scales of intensity, with evidence of glaciation extending almost to the confluences of the valley.

The Picton Valley, along with the Huon and the Weld Valleys, is one of the few areas in Tasmania where there is a major concentration of tall eucalypt–rainforest ecosystems and where the forests are mostly intact with potential for ongoing natural processes to operate. Notwithstanding that some parts of the forests have been subject to industrial-scale logging operations, the combination of the intact forests and the option of being able to naturally rehabilitate the logged areas, means the 'Three Valleys' forests still offer outstanding potential for conservation, including maintaining natural processes. [xvii]

Large tracts of forests in these regions which are proposed to be removed remain unlogged to date. Their intact condition provides a new 'lowland' or lower valley manifestation of attributes that were already protected within the TWWHA, for example glacial, karst, tall eucalypt forest and rainforest. [xviii]

Additionally, recent investigations have revealed cavernous karst in the lower Weld Valley in Eddy Creek catchment, not far above the Weld–Huon confluence.

Russell

The entire region of the Russell forests that connect the Weld Valley to the Styx Valley have been proposed to be removed. The boundary previous to June 2013 of the TWWHA in this region was inappropriate in terms of capturing the ecological diversity of the natural vegetation. There has been long held concern about the vulnerability of the alpine communities of the Snowy Range to the impacts of industrial forestry operations on steep slopes immediately below the alpine communities. Escape of fire from forestry activities is an ongoing threat to the TWWHA and is a particular threat to the alpine environment. [xix]

By adding the tall eucalyptus forests of the Russell region, intact ecosystems and some areas disturbed by logging, meant that it contributed to the overall integrity of the TWWHA, in particular by extending protection of the full natural ecological/vegetation sequence downslope from the alpine environment into the regionally dominant eucalypt forests; facilitating natural ecological processes, including fire regimes, over a greater altitudinal range than had been the case and facilitating maintenance of ecological connectivity in the tall eucalypt ecosystem within the boundaries of the TWWHA. [xx]

The forests in this newly listed region on the upper eastern slopes of the Snowy Range represent an important opportunity to enhance the value and integrity of the TWWHA. Adding these lands provides an opportunity to establish a more appropriate World Heritage boundary than an arbitrary contour line across the face of a mountain range. [xxi]

Butlers Gorge

The addition to the TWWHA of Butlers Gorge, made a significant ecological contribution to the reserve and preserved a magnificent tract of tall eucalypt forest. The Liberal Federal Government propose to remove all the Butlers Gorge region.

Butlers Gorge shows the progression from mixed species eucalypt forests in the south transitioning to pure *Eucalyptus delegatensis* stands as the elevation increases and the climatic conditions become colder. This is one of the key reasons why this unique forest was recommended to be included in the TWWHA. The IVG report concluded that ensuring these forests remain in

“as close to a wilderness condition as possible” is the best way to ensure that such ecological processes are maintained. [xxii]

Butlers Gorge has exceptional wilderness value, and prior to the advent of logging and new roads within the past decade, it was mapped as being “high quality wilderness” [Wilderness Mapping 2006]. [xxiii] The cessation of logging and roading in this region and the listing to the TWWHA, combined with some rehabilitation activity, has given this area the ability to be restored to wilderness condition.

Rehabilitation

The existing plantations, covering 218 hectares, which had been included in the 2013 modification, are a potential source of invasive species, and consideration of these species was articulated when the boundary extension was put forward. The Liberal Federal Government proposal to withdraw these areas from the property will disrupt the potential rehabilitation of these areas.

It is not unusual for World Heritage sites to contain small areas of damaged forest for the sake of boundary integrity. Nearly one third of the famous Californian Redwood World Heritage property, which contains the world’s tallest trees, had been clear felled before it was listed in 1980. The logged areas have been undergoing rehabilitation in order to protect giant trees downstream from being damaged by erosion and sedimentation. [xxiv]

sources

[i] Hitchcock, Peter. (2011) IVG Forest Conservation Report 5A, Verification of the Heritage Value of ENGO-Proposed Reserves, An assessment and verification of the ‘*National and World Heritage Values and significance of Tasmania’s native forest estate with particular reference to the area of Tasmanian forest identified by ENGOs as being of High Conservation Value.*’ For the Independent Verification Group for the Tasmanian Forests Intergovernmental Agreement 2011.

[ii] Tasmanian Wilderness World Heritage Area (Australia) Property ID 181ibis, Supplementary Information to the Proposal for A Minor Boundary Modification. Australian Government. 2013.

[iii] ibid

[iv] ibid

[v] ibid

[vi] Hitchcock, Peter (2011)

[vii] ibid

[viii] ibid

[ix] Ibid

[x] Hitchcock, Peter. (2011) IVG Forest Conservation Report 5A, Verification of the Heritage Value of ENGO-Proposed Reserves, An assessment and verification of the '*National and World Heritage Values and significance of Tasmania's native forest estate with particular reference to the area of Tasmanian forest identified by ENGOs as being of High Conservation Value.*' For the Independent Verification Group for the Tasmanian Forests Intergovernmental Agreement 2011.

[xi] ibid

[xii] ibid

[xiii] ibid

[xiv] ibid

[xv] ibid

[xvi] ibid

[xvii] ibid

[xviii] ibid

[xix] ibid

[xx] ibid

[xxi] ibid

[xxii] ibid

[xxiii] ibid

[xxiv] Law, G. [Australia a traitor to the World Heritage Convention](#) 2014