



Florentine Protection Society

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Tasmanian Wilderness World Heritage Senate Inquiry: Submission from the Florentine Protection Society Inc

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Formed in 2009, the Florentine Protection Society is an apolitical, not-for-profit community organisation with the main purpose of preserving Tasmania's ancient forests, including the forests of the Upper Florentine Valley. The Society campaigned for World Heritage listing for the Upper Florentine and now calls on the Federal Government to respect its status as part of the Tasmanian Wilderness World Heritage Area. The Society is still calling on the Tasmanian Government to add the Upper Florentine to the Southwest National Park. Further information about the Society, our policies and campaign can be found on our website: <http://florentine.org.au/>

The Florentine Protection Society (FPS) strongly opposes, and is actively campaigning against, the removal of the Florentine Valley from the Tasmanian Wilderness World Heritage Area (TWWHA) which was recently listed in 2013. Also, the FPS is strongly opposed to the Australian Government requesting the World Heritage Committee to de-list any of the 74,000 hectares from the Tasmanian World Heritage listing.

In response to the Inquiry's terms of reference, the FPS submits the following.

- a. the natural world heritage values of the Tasmanian Wilderness World Heritage Area minor boundary extension passed by the World Heritage Committee in June 2013;**
 - The World Heritage Committee accepted the extension to the TWWHA in 2013 because it met all four natural World Heritage criteria. Features of the outstanding universal values found in the extension areas include: the tall eucalyptus forests, glacial landscapes and karst features; additional important habitat for threatened species such as the Tasmanian devil and spotted-tailed quoll; primitive flora and fauna groups, of either Gondwanan origin, or example of biological evolution; and increased representation of endemic species.
 - The high conservation values of the 2013 extension to the TWWHA areas had been previously independently verified by an Independent Verification Group established by both the Australian and Tasmanian Governments in support of the Tasmanian Forest Agreement. This verification

was a result of expert studies.

- The work of the Independent Verification Group was undertaken in support of the Tasmanian Forest Agreement. As a consequence the world heritage values of the 2013 extension forests are widely recognised and their inclusion in the TWWHA is supported by broad sections of the Tasmanian community, including the majority of the forest industry.
- In the Florentine valley some of the tallest flowering plants in the world have been recorded and some are still found in the Upper Florentine valley. There is also potential for more giant trees to be found in the region. As unique naturally occurring flora these have attracted world-wide scientific and public interest. These giant trees have huge tourism potential as can be seen with the giant redwood forests in the USA. In 2009, visitor numbers to the redwood forests ranged from 75,000 to 15,000 per month (See appendix A for further details. Reference: *White Paper on Californian Tourism*, June 2011.).
- The lower Florentine contains mainly intact tall eucalyptus forests which are relicts of once very extensive tall forests which would have extended from the Florentine Valley to the Upper Derwent Valley. Importantly, they provide a continuous corridor from the Florentine to the Upper Derwent Valley. This allows for the movement of wildlife and plant material facilitating ecological processes.
- The tall wet eucalyptus forests are a poorly protected vegetation community in Tasmania and the extension to the TWWHA helps protect some of this remaining community.
- The forests in the Upper Florentine are of exceptional diversity and this area also contains large stands of mixed forest, rainforest, tall eucalyptus, eucalyptus woodland and moorlands. This mix of vegetation types, especially the tall eucalyptus forests, adds important diversity to the TWWHA and to its value and integrity.
- The critically endangered myrtle elbow orchid (*Thynninorchis nothofagicola*) only occurs in the Upper Florentine Valley and nowhere else in the world.
- The Florentine Valley also contains important threatened species such as: the Tasmanian devil (*Sarcophilus harrisii*) which is listed as endangered both in Tasmania and nationally; the spotted-tailed quoll (*Dasyurus maculatus*) which is listed as vulnerable nationally and rare in Tasmania; the Tasmanian wedge tail eagle (*Aquila audax subsp. fleagi*) which is listed as endangered both in Tasmania and nationally; the grey goshawk (*Accipiter novaehollandiae*) which is listed as endangered in Tasmania; the slender cave beetle (*Goedetrechus parallelus*) which is listed as vulnerable in Tasmania; and the round leaf broom heath (*Monotoca submutica var. autumnalis*) which is listed as rare in Tasmania.
- One of the most important extensive tracts of karst in Australia occurs in the Florentine Valley. The karst is also considered important as it is located in unlogged tall eucalyptus forest. The karst extends along the length of the valley and up its lower slopes.

- b. the interaction between the Department of the Environment and the Prime Minister and other ministers' offices, and the process followed in the department's review of the 2013 extension that led to a lesser minor boundary extension being submitted for consideration at the 2014 World Heritage Committee meeting;**
- c. any action the Department of the Environment has funded, directed and overseen to rehabilitate any degraded areas within the World Heritage Area identified in the department's 2013 review, as per the requirements of the World Heritage Convention;**

At the time of writing FPS has no specific information about these issues.

- d. the extent and description of any areas of degraded forest included in the 2013 boundary adjustment and the World Heritage Committee's rationale for including them;**
 - An expert in World Heritage, Peter Hitchcock, states that the great majority (about 90%) of what is proposed to be removed from the TWWHA has not been disturbed, and that only 5-6% of the area has been logged since 1960. Any logging that may have occurred prior to 1960 has been selectively logged and can hardly be noticed. The World Heritage committee was aware of this past disturbance when the area was approved in the boundary extension to the TWWHA.
 - Past disturbance does not mean that an area should not be included as World Heritage or is no longer of conservation value. 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'. Rehabilitation is the appropriate response to these small areas of degraded forest, not de-listing huge areas of surrounding pristine old-growth forest.
 - As long ago as July 2008, the World Heritage Committee requested Australia 'to consider, at its own discretion, extension of the property to include appropriate areas of tall eucalyptus forest, having regard to the advice of IUCN'. This illustrates that the World Heritage Committee welcomes the inclusion of small isolated areas of degraded ecosystems within an area which can be rehabilitated to World Heritage standard.
 - To protect the integrity of an ecosystem the World Heritage boundary may need to include small isolated degraded areas. For example, isolated logging coups on the boundary to Mt Field National Park need to be included to protect the integrity of the remaining tall forests in the Florentine.
- e. implications for the World Heritage status of the Tasmanian Wilderness World Heritage Area of the Government's request to withdraw the 74,000 hectares for logging;**
 - The FPS believes that the Australia Government only wants to delist the 2013 TWWHA extension area for political reasons and there is no scientific evidence to suggest it should be delisted.
 - The FPS believes the Australian Government's claim is just a ploy to open up these areas to logging which would ensure the degradation of these magnificent tall eucalyptus forests, karst and glacial features, unique flora and fauna and other important values.
 - The FPS believes that removal of these areas from the TWWHA would seriously damage the integrity of the TWWHA.

- FPS believes that any proposal to log these World Heritage old growth forests would result in placing the TWWHA on the World Heritage in Danger list.
- This application for de-listing is an appalling precedent and totally undermines Australia's standing as anything approaching a responsible global citizen. We understand that already two African countries have lodged similar de-listing applications in order to enable fracking and other resource exploitation. Such applications themselves undermine the values of the World Heritage framework and show contempt for the TWWHA values Australia is trying to protect.

f. any related matter

- Identified and well-known outstanding cultural values are known to exist in the 2013 extension of the TWWHA. These include, for example, the Pleistocene era Nanwoon Cave in the Upper Florentine, which the Australian Government has requested to be de-listed.
- As long ago as July 2008, the World Heritage Committee requested Australia 'to consider, at its own discretion, extension of the property to include appropriate cultural sites reflecting the wider context of Aboriginal land-use practices, and the possibility of re-nominating the property as a cultural landscape'.
- In 2013, with the listing of the extended area for natural heritage criteria, the Australian Government committed \$500,000 to undertake an assessment of the cultural values in consultation with the Aboriginal community. This has not yet commenced. The FPS finds it astonishing that the Australian Government is calling for the removal of any areas from the TWWHA prior to the completion of that assessment, and particularly where those areas are known to have outstanding cultural values which the World Heritage Committee had requested be nominated.
- Our view is that the request for delisting is based on a spurious assumption that by releasing wood back to the forestry industry this will somehow revive the unsustainable forestry industry in Tasmania. That this is not a reality is indicated by the fact that the majority of the forestry industry are signatories to the Tasmanian Forest Agreement. This Agreement is predicated upon both World Heritage status for the relevant areas and the attainment of Forest Stewardship Council certification for Forestry Tasmania's forest management unit. Both are needed to sustain that Agreement and to prevent continuing conflict around forest issues.
- It is political opportunism of a low level to suggest that delisting will somehow revive an ailing forestry industry. Even if this were the case, of course, there would be no justification for de-listing because of the other values which these areas embody. If the argument is about employment opportunities in the forest industry it is worth noting that the workforce involved with the management of parks and heritage areas etc., includes a variety of professional, administrative, technical, clerical and trade employees.

We understand that the Senate Inquiry is holding a public hearing in Hobart on Monday 31 March 2014, and the Florentine Protection Society would like to give evidence at that hearing.

Signed

on behalf of the Florentine Protection Society,

Angela McGowan

Secretary

Appendix A

Summary of economic benefits of the redwoods and National Parks in California

Sourced from: White Paper on Californian Tourism, July 2011;
US Census Bureau
Dean Runyan Associates

In 1984 the *California Tourism Policy Act* articulated the importance of tourism to California and defined a structure for State tourism marketing. **Since then the promotion of redwoods has been an integral part of that tourism promotion, not just on ideological grounds but for the economic benefits as identified by the U.S. Travel Association.** They estimate that 4.4% of all employment in California is directly supported by traveller spending.

Remarkably, the \$17 billion spent in California in 2010 by international travellers alone was greater than the combined value of the state's top four product exports: civilian aircraft, non-industrial diamonds, computer parts and voice/image/data transmission equipment (Dean Runyan Associates; U.S. Census Bureau).

Tourism creates jobs across a broad spectrum of skill sets and educational levels and offers employment across a huge variety of economic sectors – from hospitality to retail, restaurants and attractions, to rental cars and other transportation businesses.

Tourism is remarkably resilient, weathering down economies better than most other industries. This provides much needed tax revenues, which helps to reduce unemployment levels.

Because tourism is largely a service industry, which means the work can only be done by employees (as opposed to machines) and the work cannot be outsourced, **tourism spending has more of a direct impact on jobs** than in most other industries.

In addition, tourism fills a critical role in diversifying and stabilizing rural economies. The tourism industry is the top employer in two of California's eight rural regions – Deserts and High Sierra – and ranks among the top four employers in six of the eight regions. Without the visitor revenues that support these vulnerable economies, preservation of California's natural icons, cultural resources, and historical landmarks and districts would be nearly impossible.

What cannot be emphasized enough is the value of tourism as an export industry. Non-resident tourism spending in California is comparable to the sales of exported California products because the end result is the same – California businesses are infused with currency originating from outside the state. International visitor spending alone in California in 2010 was more than the combined value of the state's top four product exports.