

Chapter 2

Reasons for the 2014 modification

Introduction

2.1 As outlined in the previous chapter, the Government's proposal advanced the following reasons for the 2014 boundary modification request:

- inclusion of degraded areas in the 2013 extension, specifically plantations and previously logged forests;
- objections from adjoining landholders and communities; and
- social and economic reasons, including the need for sustainable forest industry in Tasmania, and to assist the long term viability of the special species timber sector.

2.2 This chapter critically examines these reasons in turn below.

Inclusion of degraded areas

2.3 The 2014 boundary modification proposal states that it:

...seeks to remove a number of areas in the extension approved by the [World Heritage] Committee in June 2013 that contain pine and eucalypt plantations and previously logged forest. The Australian Government considers these areas detract from the Outstanding Universal Value of the property and its overall integrity and that the assessment work that included such areas in the property did not sufficiently take this in to account.¹

2.4 This issue was also highlighted in the letter from the Environment Minister, the Hon Greg Hunt MP, on 18 December 2013, to the Chair of the World Heritage Committee conveying the Australian Government's intention to undertake a reassessment of the extension and to request a minor boundary modification in 2014. The letter stated that the government was:

...concerned that the extension approved by the World Heritage Committee in June 2013 includes a number of pine and eucalypt plantations along with some areas of forest that have previously been subject to heavy logging. These areas detract from the overall outstanding universal values of the property.²

Extent of 'degraded' areas in the 2013 extension

2.5 The committee notes that the Government's 2014 proposal provides very little detail on the areas in the proposed excision which have actually been logged or

1 Australian Government, *Proposal for a Minor Modification to the Boundary of the Tasmanian Wilderness World Heritage Area*, 31 January 2014, p. 5.

2 Department of the Environment, *Response to written questions on taken on notice*, 7 March 2014, p. 6.

contain plantations. Indeed, some witnesses were highly critical of this lack of detail.³ For example, Mr Adam Beeson, a solicitor from the Environmental Defender's Office in Tasmania (EDO (Tas)) told the committee that the government has failed 'to detail the so-called degraded areas they heavily relied on in the proposal':

The government submission does not spell out where and how large those areas are nor does it spell out what terms like 'degraded' or 'disturbed' or 'logged' mean.⁴

2.6 Mr Peter Hitchcock, a world heritage consultant who was involved in the independent verification process leading up to the 2013 extension, described the government's proposal dossier as 'extraordinary for a submission to the World Heritage Committee in the lack of information about World Heritage matters'.⁵

2.7 Several submissions urged this committee to obtain precise data on the areas within the Tasmanian Wilderness World Heritage Area that have been logged and their current state, including plans for rehabilitation.⁶ The Australian Network of Environmental Defender's Offices (ANEDO) noted that:

The failure to publicly release the details of the allegedly 'disturbed' areas, which the Australian government argues warrant the proposed modification, is unfortunate.⁷

2.8 Indeed, evidence to this inquiry revealed that the vast majority of the 74,000 hectares proposed for excision is in fact intact natural vegetation which is in no way degraded. Many argued more than 90 per cent of the excision area has high conservation values and has not been logged.⁸ As Mr Geoff Law observed on behalf of The Wilderness Society, 'the overwhelming majority of the area proposed for excision by the current government is ecologically intact natural vegetation'.⁹

3 See, for example, Mr Adam Beeson, Solicitor, EDO (Tas), *Committee Hansard*, 31 March 2014, pp 23–24; Mr Peter Hitchcock AM, *Committee Hansard*, 31 March 2014, p. 38; The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, p. 13.

4 Mr Adam Beeson, Solicitor, EDO (Tas), *Committee Hansard*, 31 March 2014, pp 23–24.

5 Mr Peter Hitchcock AM, *Committee Hansard*, 31 March 2014, p. 38. Note that the independent verification process is discussed further in the previous chapter and later in this chapter.

6 See, for example, Tasmania Conservation Trust, *Submission 11*, p. 2.

7 ANEDO, *Submission 17*, p. 15.

8 See, for example, Friends of the Earth, *Submission 7*, pp 1–2; Tasmanian Conservation Trust, *Submission 11*, p. 2; Tasmanian National Parks Association, *Submission 15*, p. 1; National Parks Australia Council, *Submission 21*, p. 1; The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, p. 3; Florentine Protection Society, *Submission 18*, p. 3; West Wellington Protection Group, *Submission 20*, p. 1; Mr Geoff Law AM, Expert Consultant, The Wilderness Society, *Committee Hansard*, 31 March 2014, pp 6–7; Mr Peter Hitchcock AM, *Committee Hansard*, 31 March 2014, p. 38; Professor Brendan Mackey, *Committee Hansard*, 6 May 2014, p. 10.

9 Mr Geoff Law AM, Expert Consultant, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 2.

2.9 The Wilderness Society, Australian Conservation Foundation (ACF) and Environment Tasmania submitted that within the 74,039 hectares proposed to be excised from the World Heritage Area:

- approximately 7,600 hectares had been logged post-1960 (or around 10 per cent of the proposed excision);
- approximately 30,000 hectares is old growth forest (around 40 per cent of the proposed excision); and
- almost all remaining vegetation consists of other natural vegetation such as buttongrass or other types of unlogged forest.¹⁰

2.10 They concluded that the claims about logged areas and plantations are 'grossly overstated' and 'blatantly misleading if not downright dishonest'.¹¹

2.11 Indeed, a number of other submitters and witnesses described the government's 2014 proposal as 'misleading' and 'incorrect'.¹² For example, Mr Geoff Law, a consultant for The Wilderness Society, expressed the view that:

The Australian government's claim that large areas of this proposed excision are degraded is grossly misleading. We believe that the government is being deceitful in pushing that argument out to the public. The figures show that it is only about 10 per cent of the area proposed for excision that has previously been logged, and the area of plantations is negligible.¹³

2.12 The Wilderness Society, ACF and Environment Tasmania cited the example of the area of the Upper Florentine Valley, where they claimed that the logged area comprises about one per cent of the excision, with old growth forest comprising over 50 per cent.¹⁴

2.13 Mr Sean Cadman, an environmental consultant, who had been involved in the independent verification process prior to the 2013 extension, advised that his work indicated that in the areas proposed for excision:

...the level of disturbance overall is low. Only four per cent of the area was identified as being heavily disturbed. The majority of the 7,300-odd hectares that have been logged since 1960 has recovered or is recovering... For all intents and purposes the areas proposed for retention and excision

10 The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, pp 3, 5 and 14; see also Mr Sean Cadman, *Supplementary Submission 26*, pp 1–2.

11 The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, pp 3 and 13.

12 See, for example, Huon Valley Environment Centre, *Submission 8*, p. 1; Mr Geoff Law AM, Expert Consultant, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 6; Mr Peter Hitchcock AM, *Committee Hansard*, 31 March 2014, p. 38.

13 Mr Geoff Law AM, Expert Consultant, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 6; see also Mr Peter Hitchcock AM, *Committee Hansard*, 31 March 2014, p. 38.

14 The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, pp 3, 15–16.

are in similar condition and contain similar values. The most significant difference is the amount of potentially available timber in the areas proposed for excision compared to the areas proposed to be retained.¹⁵

2.14 In contrast, both the Tasmanian Special Timbers Alliance and Mr George Harris from the Huon Resource Development Group argued that other areas in the proposed excision, such as almost all of Recherche Bay, had been extensively and intensively logged.¹⁶

2.15 In order to establish the extent of disturbance in the proposed excision area, the committee wrote to Forestry Tasmania requesting further details as to the amount of old growth forest in the area proposed to be excised from the Tasmanian Wilderness World Heritage Area. Forestry Tasmania advised that the 'proposed excision area contains approximately 28,530 hectares of mapped old growth forest' – or around 38 per cent of the proposed excision area.¹⁷

2.16 The Department of the Environment confirmed, in response to the committee's questioning, that only four per cent of the 74,000 hectares could be described as heavily disturbed.¹⁸ However, they also advised that:

The degraded areas are not in a uniform and singular place within the area; they are scattered throughout it. The government is concerned that those areas together detract from the value of the property and has submitted an application for consideration by the World Heritage Committee that retains what we would call a sensible boundary that joins the pre-existing national parks onto the new World Heritage area and takes into account the values that exist across it.¹⁹

Degraded areas – plantations

2.17 In terms of plantations, the committee notes that 218 hectares of plantations were contained in the whole of the 2013 extension to the World Heritage Area. This was specifically stated in the information provided by the Australian Government to the World Heritage Committee in 2013:

Several existing plantations, covering 218 hectares, have been included in the proposed addition. These include young *Eucalyptus nitens*, a species introduced to Tasmania and therefore capable of invading and interbreeding with local Tasmanian eucalypt species. These plantations are a potential

15 Mr Sean Cadman, *Committee Hansard*, 31 March 2014, p. 39.

16 Mr George Harris, President, Huon Resource Development Group, *Committee Hansard*, 31 March 2014, p. 12; Tasmanian Special Timbers Alliance, *Submission 96*, p. 18.

17 Forestry Tasmania, *Answers to questions on notice*, dated 11 April 2014 and 7 May 2014; see also Mr Sean Cadman, *Supplementary Submission 26*, p. 1.

18 Dr Kimberly Dripps, Deputy Secretary, Department of the Environment, *Committee Hansard*, 6 May 2014, p. 21.

19 Dr Kimberly Dripps, Deputy Secretary, Department of the Environment, *Committee Hansard*, 6 May 2014, p. 22.

source of invasive species and consideration will be given to removal of trees to avoid seed dispersal. These sites are to be rehabilitated.²⁰

2.18 The precise area of plantations in the excision area was not spelled out in the Government's 2014 proposal to the World Heritage Committee. The only areas identified as containing plantations are the Styx-Tyenna area and the Florentine.²¹

2.19 Witnesses and submitters told the committee that the amount of plantation in the proposed excision area is 'negligible', or around 8–10 hectares of the 74,000 hectares proposed to be excised from the World Heritage Area.²²

2.20 The committee notes that, since the original extension contained 218 hectares of plantations, this means over 200 hectares of plantations will remain in the Tasmanian Wilderness World Heritage Area. As Mr Law observed:

The government's proposal, which is supposedly all about removing areas of unacceptable plantation within the World Heritage area, actually leaves other areas of plantation within the World Heritage area, some of which are undergoing rehabilitation...it certainly adds an element of inconsistency and ecological irrationality to the government's proposal.²³

2.21 In any case, it was suggested that any areas of plantation that are within the extension 'can be removed and rehabilitated'.²⁴ Indeed, the Department advised that government funding of \$1,237,500 over two years had been provided in July 2013 for work to restore former plantations back to native forests in the area.²⁵ A departmental representative advised that this rehabilitation work was being conducted in areas that are not proposed to be excised from the World Heritage Area.²⁶

Reasons for including 'degraded' areas

2.22 Many submitters and witnesses pointed out that the World Heritage Committee was well aware of the presence of these 'degraded' areas when it approved

20 Australian Government, *Tasmanian Wilderness World Heritage Area, Supplementary information to the proposal for a minor boundary modification*, 28 February 2013, p. 27.

21 Australian Government, *Proposal for a Minor Modification to the Boundary of the Tasmanian Wilderness World Heritage Area*, 31 January 2014, p. 6.

22 The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, p. 3; see also Mr Peter Hitchcock AM, *Committee Hansard*, 31 March 2014, p. 38; Professor Brendan Mackey, *Committee Hansard*, 6 May 2014, p. 10; ANEDO, *Submission 17*, p. 7, footnote 14; Mr Geoff Law AM, Expert Consultant, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 2; Mr Sean Cadman, *Submission 26*, p. 3.

23 Mr Geoff Law AM, Expert Consultant, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 8.

24 See, for example, Tasmanian Conservation Trust, *Submission 11*, p. 2; see also Mr Peter Hitchcock AM, *Submission 25*, p. 7.

25 Department of the Environment, *Submission 14*, p. 4; see also Huon Valley Environment Centre, *Submission 8*, p. 3.

26 Ms Claire Howlett, Assistant Secretary, Biodiversity Policy Branch, Department of the Environment, *Committee Hansard*, 6 May 2014, p. 30.

the 2013 extension, and that the Australian Government's 2013 submission had made it clear that some areas within the proposed modification had been logged and others contained plantations.²⁷ It was also noted that the extension was in response to a long history of requests by the World Heritage Committee as evidence of its willingness for these areas to be included.²⁸ For example, Mr Nick Sawyer, Secretary of the Tasmanian National Parks Association, observed that:

The World Heritage Committee was well aware of the existence of coops and plantations in the area of the 2013 extension at the time it was evaluated...So I find it extraordinary that they [the government] should now use the existence of these as an argument for reversing that nomination.²⁹

2.23 In addition, submitters commented that, in any case, under the World Heritage Convention and associated Operational Guidelines, World Heritage areas do not need to be 'pristine'.³⁰ While it was noted that the World Heritage Operational Guidelines require properties to meet the conditions of 'integrity',³¹ some submitters pointed out that the Operational Guidelines make it clear that 'integrity' does not require a complete absence of disturbance.³² The Operational Guidelines state:

For all properties nominated under criteria (vii) - (x), bio-physical processes and landform features should be relatively intact. However, it is recognized that no area is totally pristine and that all natural areas are in a dynamic state, and to some extent involve contact with people. Human activities,

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- 27 See, for example, Friends of the Earth, *Submission 7*, p. 2; Tasmanian National Parks Association, *Submission 15*, p. 2; ANEDO, *Submission 17*, p. 9; Women's Forest Trust, *Submission 19*, p. 2; The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, pp 3 and 11; Mr Geoff Law AM, Expert Consultant, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 4; Mr Nick Sawyer, Secretary, Tasmanian National Parks Association, *Committee Hansard*, 31 March 2014, p. 29.
- 28 See, for example, Florentine Protection Society, *Submission 18*, p. 3; The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, pp 7–9; Mr Vica Bayley, Tasmanian Campaign Manager, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 3; Mr Geoff Law AM, Expert Consultant, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 3; Mr Nick Sawyer, Secretary, Tasmanian National Parks Association, *Committee Hansard*, 31 March 2014, p. 29; Professor Brendan Mackey, *Committee Hansard*, 6 May 2014, p. 15; Mr Alec Marr, *Submission 106*, pp 1–2.
- 29 Mr Nick Sawyer, Secretary, Tasmanian National Parks Association, *Committee Hansard*, 31 March 2014, p. 29.
- 30 See, for example, Mr Peter Hitchcock AM, *Submission 25*, p. 8; Friends of the Earth, *Submission 7*, p. 2; Florentine Protection Society, *Submission 18*, p. 3; Tasmanian Conservation Trust, *Submission 11*, p. 2; Law Council of Australia, *Submission 27*, p. 10; Mr Adam Beeson, Solicitor, EDO (Tas), *Committee Hansard*, 31 March 2014, pp 23–24; ANEDO, *Submission 17*, p. 7.
- 31 Operational Guidelines, paragraph 78; see also, for example, Tasmanian Special Timbers Alliance, *Submission 96*, p. 16.
- 32 See, for example, ANEDO, *Submission 17*, p. 9; The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, p. 17; Law Council of Australia, *Submission 27*, p. 11.

including those of traditional societies and local communities, often occur in natural areas. These activities may be consistent with the Outstanding Universal Value of the area where they are ecologically sustainable.³³

2.24 Mr Adam Beeson from the EDO (Tasmania) explained further:

...the convention and the operational guidelines that are used to apply it are clear in that World Heritage areas do not have to be completely pristine. That is the case throughout a number of areas around the world and indeed in Tasmania. For example, in 2010 an area in Melaleuca was included within a World Heritage listing which had been extensively tin mined. It is a furphy to say that an area has to be completely pristine and untouched. It is also somewhat insulting to the Tasmanian Aboriginal community to an extent. It is a furphy to say that it has to be pristine and untouched in order to be included as a World Heritage area.³⁴

2.25 Several submitters and witnesses noted that there were good reasons for including the 'degraded' areas in the 2013 extensions, such as ecological connectivity and boundary integrity.³⁵ Indeed, many argued that the 2013 extension had contributed to a 'more rational and contiguous boundary' for the World Heritage Area.³⁶ Mr Vica Bayley, from The Wilderness Society, told the committee that:

Including some of those degraded areas, irrespective of the statistics, is a very deliberate and very conscious decision in order to deliver boundary integrity, sensible reserve design...and sensible long-term reserve management.³⁷

2.26 Similarly, Mr Sawyer of the Tasmanian National Parks Association observed that:

...boundary integrity is a practical consideration for drawing boundaries...The boundary of the World Heritage area, ever since it was first proclaimed, has always been something of a political compromise rather than being based on sound ecological parameters. The 2013 extensions may not have been perfect but they were a major step towards

33 Operational Guidelines, paragraph 90.

34 Mr Adam Beeson, Solicitor, EDO (Tas), *Committee Hansard*, 31 March 2014, p. 24.

35 See, for example, Mr Peter Hitchcock AM, *Submission 25*, pp 2, 6, 9; Mr Sean Cadman, *Submission 26*, p. 3; Professor Brendan Mackey, *Submission 9*, p. 3 and *Committee Hansard*, 6 May 2014, pp 10 and 15; The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, pp 3 and 17.

36 Tasmanian Conservation Trust, *Submission 11*, p. 2; see also, for example, Mr Peter Hitchcock AM, *Submission 25*, p. 5; Professor Brendan Mackey, *Committee Hansard*, 6 May 2014, p. 10.

37 Mr Vica Bayley, Tasmanian Campaign Manager, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 3; see also The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, p. 3; Mr Geoff Law AM, Expert Consultant, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 2; Law Council of Australia, *Submission 27*, pp 11–12.

giving us a more ecologically sound boundary. The revocations are basically reversing this.³⁸

2.27 Other submissions emphasised the importance of the extension for connectivity of a corridor of tall eucalypt forests.³⁹ The Tasmanian National Parks Association pointed out that:

The whole is obviously greater than the sum of its parts and the tall eucalypt forests now included within the TWWHA [Tasmanian Wilderness World Heritage Area] form a near continuous connected ribbon of forest extending for more than 180 km. The global significance of a connected area of tall eucalypt forests, albeit involving some restoration, added a major new dimension to the TWWHA.⁴⁰

2.28 Mr Peter Hitchcock explained that the tall eucalypt forest in the Tasmanian Wilderness World Heritage Area:

...should not be seen as simply patches of different pieces of forest disjunct. They are in fact part of a continuum up the eastern boundary, which takes in the full altitudinal range, from near sea level at the bay to more than 1,000 metres in the Upper Derwent. It is a corridor of forest and you simply cannot take out pieces without having a serious impact on the integrity of those values, and that is what is being proposed.⁴¹

2.29 In response to questioning as to how the same data was used to draw up different boundaries, representatives of the Department of the Environment advised that 'there is a degree of subjectivity in the construction of boundaries around natural properties' and that the Department had attempted to 'map a boundary that assured connectivity between the existing protected areas' and that was 'practical in management terms'.⁴²

2.30 However, the Wilderness Society, ACF and Environment Tasmania argued, by way of example, that the excision proposal in Upper Florentine 'fails to consider boundary coherence, connectivity, habitat, cultural sites, karst or any other features in that critical valley'.⁴³

38 Mr Nick Sawyer, Secretary, Tasmanian National Parks Association, *Committee Hansard*, 31 March 2014, pp 29–30.

39 See, for example, Tasmanian National Parks Association, *Submission 15*, p. 2; Huon Valley Environment Centre, *Submission 8*, p. 2; Mr Peter Hitchcock AM, *Submission 25*, p. 9 and *Committee Hansard*, 31 March 2014, p. 42.

40 Tasmanian National Parks Association, *Submission 15*, p. 2.

41 Mr Peter Hitchcock AM, *Committee Hansard*, 31 March 2014, p. 42.

42 Dr Kimberley Dripps, Deputy Secretary, Department of the Environment, *Committee Hansard*, 6 May 2014, p. 19; Mr Stephen Oxley, First Assistant Secretary, Department of the Environment, *Committee Hansard*, 6 May 2014, p. 19.

43 The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, p. 21.

Other features in 'degraded' areas

2.31 Submitters and witnesses noted that some of the previously logged areas to be excised from the Tasmanian Wilderness World Heritage Area contain other significant features which need to be taken into consideration. This included geomorphological features such as karst and cave systems, glacial landscapes, wildlife habitat as well as cultural heritage sites.⁴⁴

2.32 For example, the Tasmanian National Parks Association submitted that the other values in the area include:

...glacial and karst features, additional primitive flora and fauna groups, increased representation of endemic species within the TWWHA and addition of new species, and additional important habitat for threatened and rare species, including the Tasmanian devil, Spotted-tailed quoll and the Denison Rain Crayfish.⁴⁵

2.33 Dr Kevin Kiernan argued that the Tasmanian Wilderness World Heritage Area contains significant geomorphic features, and that the 2013 extension had increased 'the integrity of the geomorphic features'.⁴⁶ Indeed, he questioned the quality of technical advice behind the decision to propose revocation of certain areas from the Tasmanian Wilderness World Heritage Area:

...it would appear that an exclusively biocentric perspective has been adopted while overlooking the geodiversity and geoheritage values of areas contained within the areas involved and their relevance in terms of the World Heritage Operational Guidelines and Criteria.⁴⁷

2.34 Dr Kiernan gave the example of the Navarre Plains in the Upper Derwent area, describing their calibre as 'undoubtedly world heritage', as an area 'noteworthy for its glacial geomorphological phenomena'.⁴⁸ Noting that the boundary of this glacial feature had been 'chopped off', Dr Kiernan submitted that the proposed revocation of the Navarre Plains area:

...directly targets a site with very clearly demonstrable world heritage values from a geomorphological perspective. From the fact that revocation is proposed, I can only presume that the officials or politicians responsible for proposing revocation of this area either haven't properly investigated the

44 See, for example, The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, p. 3; Mr Geoff Law AM, Expert Consultant, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 2. Note that cultural heritage is discussed in the next chapter.

45 Tasmanian National Parks Association, *Submission 15*, p. 2.

46 Dr Kevin Kiernan, *Committee Hansard*, 31 March 2014, p. 31.

47 Dr Kevin Kiernan, *Submission 6*, p. 1.

48 Dr Kevin Kiernan, *Submission 6*, p. 8.

World Heritage values involved, haven't had sufficient expertise to recognise those values, or simply don't care.⁴⁹

2.35 Dr Kiernan's view was supported by other witnesses. Mr Hitchcock, for example, told the committee that the areas proposed for delisting contain:

...numerous important attributes and values that make important contributions to the integrity of the outstanding universal values which make up the World Heritage area. It is not just the very important tall eucalypt forests—because they have been front and centre of the whole exercise—but a range of other important features, such as karsts, caves, glacial features, threatened species and threatened communities.⁵⁰

2.36 Mr Geoff Law for The Wilderness Society explained that:

...when it comes to glacial landscapes...the fact that there has been some logging in some of the forests on the landscape, is neither here nor there ...other than to say it is necessary to rehabilitate them for the future integrity of the area.⁵¹

2.37 The Wilderness Society, ACF and Environment Tasmania also noted that:

...the inclusion, protection and rehabilitation of previously logged areas within crucial parts of the hydrological system is essential to safeguard the natural processes that create and maintain caves, cave decorations and other karst features. For this reason, several logged and recovering areas in the Florentine and Tyenna valleys are within the World Heritage property because they are part of the outstanding Junee-Florentine karst system.⁵²

2.38 A representative of the Department of the Environment advised that other features were considered in developing the dossier for the 2014 request for a minor boundary modification:

In developing the dossier for the request for a minor boundary modification, ...consideration was given to both maintaining connectivity and retaining areas with important values, such as habitat for threatened species, cultural sites, karsts or other features that contribute to the outstanding universal value of the property.⁵³

2.39 The process followed by the Department in preparing the 2014 boundary modification proposal is discussed in further detail in the next chapter.

49 Dr Kevin Kiernan, *Submission 6*, pp 4 and 8; also Dr Kevin Kiernan, *Committee Hansard*, 31 March 2014, pp 31 and 35; see also The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, p. 18.

50 Mr Peter Hitchcock AM, *Committee Hansard*, 31 March 2014, p. 38.

51 Mr Geoff Law AM, Expert Consultant, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 2.

52 The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, p. 18.

53 Dr Kimberley Dripps, Deputy Secretary, Department of the Environment, *Committee Hansard*, 6 May 2014, p. 18.

Rehabilitation of 'degraded' areas

2.40 As noted earlier in the context of plantations, the potential for rehabilitation of degraded areas was also raised during the committee's inquiry. The committee was told that the World Heritage Convention recognises, provides for and, indeed, imposes a duty to rehabilitate World Heritage.⁵⁴ For example, ANEDO stated that the World Heritage Convention 'clearly envisages the inclusion of areas with natural values, which require rehabilitation or active management'.⁵⁵

2.41 The Tasmanian Conservation Trust argued that the 'degraded' areas could be rehabilitated and this would enhance the world heritage values of the whole area:

Contrary to claims made by the Australian Government, the retention and rehabilitation of areas affected by logging will result in the best outcome for the values within those areas, areas immediately surrounding them and for the entire TWWHA.⁵⁶

2.42 Mr Peter Hitchcock expressed the view that the majority of degraded areas included in the June 2013 extension 'are capable of rapid natural rehabilitation with minimal intervention'.⁵⁷

2.43 The Tasmanian National Parks Association pointed out that:

Past logging practices may add to a perception of loss of value greater than is actually the case. A not uncommon practice, and one used overseas, known as strategic logging is to first log the upper reaches of a valley so as to claim that the values of the whole valley have been diminished. Where this has occurred, such practices should not be rewarded. This would be akin to punching a small hole in the Mona Lisa and then claiming the whole picture has been destroyed. Obviously we would repair the picture, just as we can with the valley.⁵⁸

2.44 Several submitters cited examples of areas added to the Tasmanian Wilderness World Heritage Area in the past which had undergone rehabilitation. The addition of the Melaleuca-Cox Bight area, which had been the subject of mining activities in 2012 was provided as evidence of the World Heritage Committee's

54 ANEDO, *Submission 17*, p. 8; National Parks Australia Council, *Submission 21*, p. 2; Tasmanian National Parks Association, *Submission 15*, p. 2; Law Council of Australia, *Submission 27*, p. 10; Huon Valley Environment Centre, *Submission 8*, pp 2 and 7; Florentine Protection Society, *Submission 18*, p. 3; Mr Geoff Law AM, Expert Consultant, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 2; Mr Nick Sawyer, Secretary, Tasmanian National Parks Association, *Committee Hansard*, 31 March 2014, p. 29; Mr Tom Baxter, *Committee Hansard*, 31 March 2014, p. 50; The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, pp 17–19.

55 ANEDO, *Submission 17*, p. 7.

56 Tasmanian Conservation Trust, *Submission 11*, p. 2.

57 Mr Peter Hitchcock AM, *Submission 25*, p. 2; see also The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, pp 3–4.

58 Tasmanian National Parks Association, *Submission 15*, p. 2.

willingness to include disturbed areas within a World Heritage boundary and, indeed, in the Tasmanian Wilderness World Heritage Area.⁵⁹

2.45 Dr Kevin Kiernan pointed to the example of Exit Cave, where quarrying of limestone had occurred in the past. The area was added to the Tasmanian Wilderness World Heritage Area in 1989 and rehabilitated with 'good results'. Dr Kiernan submitted that 'rehabilitation of areas that have simply been logged is a far less complicated matter'.⁶⁰

2.46 Mr Geoff Law, for The Wilderness Society, commented that there are also examples from other World Heritage areas where degraded areas had been included:

...the basic premise that a World Heritage area cannot contain some areas that have previously been degraded and which are being subject to rehabilitation is fatally flawed...there are many World Heritage areas around the world which contain forests that were damaged prior to their inscription.⁶¹

2.47 Several submitters noted that a large part of the World Heritage listed California Redwood Forests had been logged prior to listing, and were being rehabilitated. Mr Law explained that these 'the inclusion of these [logged] areas was accepted because they were essential for proper catchment management'.⁶² He also noted that, in the context of the Tasmanian Wilderness World Heritage Area extension:

Rehabilitating those small logged areas within those ancient landscapes is absolutely critical to protecting the integrity of landscapes that have been created by the action of glaciers or which have been created by the action of water making its way through soluble rocks such as dolomite and limestone. The protection of those catchments is absolutely critical to the integrity and establishment of long-term viable boundaries for the Tasmanian wilderness World Heritage area.⁶³

59 Tasmania Conservation Trust, *Submission 11*, p. 2; ANEDO, *Submission 17*, p. 10; Tasmanian National Parks Association, *Submission 15*, p. 2; The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, p. 19; Law Council of Australia, *Submission 27*, p. 12.

60 Dr Kevin Kiernan, *Submission 6*, p. 7; see also Dr Kevin Kiernan, *Committee Hansard*, 31 March 2014, p. 33; The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, p. 19.

61 Mr Geoff Law AM, Expert Consultant, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 2.

62 Mr Geoff Law AM, Expert Consultant, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 2; see also Friends of the Earth, *Submission 7*, p. 8; Tasmanian National Parks Association, *Submission 15*, p. 2; The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, pp 3, 14, 19–21.

63 Mr Geoff Law AM, Expert Consultant, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 7.

Objections from adjoining landholders and communities

2.48 As noted in Chapter 1, another justification put forward in the 2014 boundary modification proposal is a concern that:

...when taking its decision in June 2013, the World Heritage Committee was not fully aware that a number of communities and landholders whose properties adjoin the revised boundary did not support the extension and did not consider they had adequate opportunity to comment on the proposed change.⁶⁴

2.49 However, ANEDO noted that little information had been provided on these objections:

The facts behind the argument that adjoining landholders were not supportive of the 2013 Extension are not provided in the 2014 Proposal. The 2014 Proposal gives no particulars of the landholders; where their properties are situated or why they were unsupportive.⁶⁵

2.50 Some groups, such as the Huon Resource Development Group, told the committee that they had put in a letter of objection to the World Heritage Centre but that no response had been received.⁶⁶

2.51 In response to the committee's questioning as to the number of landholders that had objected to the extension, the Department of the Environment advised that it was a 'relatively small number of landholders'.⁶⁷

2.52 It was noted in other evidence that the major adjacent landowner for the overwhelming majority of the boundary is actually Forestry Tasmania, which supported the 2013 minor modification. For example, The Wilderness Society, ACF and Environment Tasmania submitted that:

Only a small proportion of the proposed excisions adjoin private land (parts of Great Western Tiers, Central Plateau, Mersey and Dove River). The vast majority of the proposed excisions adjoin other public land, predominantly State forest managed by Forestry Tasmania. Forestry Tasmania has supported the Tasmanian Forest Agreement, which gave rise to the 2013 World Heritage minor modification...⁶⁸

64 Australian Government, *Proposal for a Minor Modification to the Boundary of the Tasmanian Wilderness World Heritage Area*, 31 January 2014, p. 5.

65 ANEDO, *Submission 17*, p. 5.

66 Mr George Harris, President, Huon Resource Development Group, *Committee Hansard*, 31 March 2014, p. 11; see also, for example, Ms Alison Carmichael, Institute of Foresters Australia, *Committee Hansard*, 6 May 2014, p. 1; Tasmanian Special Timbers Alliance, *Submission 96*, p. 20.

67 Dr Kimberley Dripps, Deputy Secretary, Department of the Environment, *Committee Hansard*, 6 May 2014, p. 18; see also Department of the Environment, *Answers to questions on notice*, dated 13 May 2014, p. 1; and Mr Sean Cadman, *Committee Hansard*, 31 March 2014, p. 44.

68 The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, p. 26; see also Mr Sean Cadman, *Committee Hansard*, 31 March 2014, p. 44; ANEDO, *Submission 17*, p. 5.

2.53 In addition, as ANEDO observed, it is 'clear from the IUCN report into the 2013 extension, that objections to that modification were received and considered'.⁶⁹ The committee notes that the IUCN Evaluation Report stated that:

IUCN has taken note that some letters of objection were received by the World Heritage Centre to the nomination, and that a reply to the points raised has been provided to the World Heritage Centre by the State Party.⁷⁰

2.54 However, some submitters and witnesses expressed concern about the adequacy of consultation during the process leading up to the 2013 listing. Indeed, of the submissions which supported the proposed excision, one of the key reasons put forward was criticism of, and concerns about, the process leading up to the 2013 listing. This included concerns about the independent verification process and the Tasmanian Forest Agreement, such as the adequacy of consultation and socioeconomic impact assessments.⁷¹ As a result of these concerns, some submitters called for the entire 2013 extension to be withdrawn or reviewed.⁷²

2.55 For example, Mr Andrew Denman of the Tasmanian Special Timbers Alliance argued that these processes were 'not inclusive of our sector nor many other sectors in the Tasmanian economy'.⁷³ Mr Denman told the committee that 'the areas that were included in the 2013 extension actually took a substantial portion of the specialty timber resource in Tasmania'.⁷⁴ He further argued that the 2013 extension breached Federal Government obligations under the 1997 Tasmanian Regional Forest Agreement, which required 'full consideration' of the 'potential social and economic

69 ANEDO, *Submission 17*, p. 5.

70 IUCN, *IUCN Evaluations of Nominations of Natural and Mixed Properties to the World Heritage List - IUCN Report for the World Heritage Committee, 37th Session Phnom Penh, Cambodia, 16 - 27 June 2013*, p. 3. WHC-13/37.COM/INF.8B2.Add. <http://whc.unesco.org/archive/2013/whc13-37com-8B2inf-Add-en.pdf> (accessed 1 May 2014).

71 See, for example, Tasmanian Special Timbers Alliance, *Submission 96*, pp 2–12, 21; Mr Andrew Denman, Spokesman, Tasmanian Special Timbers Alliance, *Committee Hansard*, 31 March 2014, pp 16–17; Huon Resource Development Group, *Submission 31*, p. 2; Mr George Harris, President, Huon Resource Development Group, *Committee Hansard*, 31 March 2014, p. 10; Mr Alan Duggan AM, Committee Member, Huon Resource Development Group, *Committee Hansard*, 31 March 2014, p. 13; Institute of Foresters Australia, *Submission 34*, pp 1–2; Ms Alison Carmichael, Chief Executive Officer, Institute of Foresters Australia, *Committee Hansard*, 6 May 2014, pp 1–2; Tasmanian Farmers and Graziers Association, *Submission 13*, pp 4–5; Meander Liffey Resource Management Group, *Submission 33*, p. 2; The Hon Greg Hall MLC, *Submission 114*, pp 1–2.

72 See, for example, Institute of Foresters Australia, *Submission 34*, p. 1; Mr George Harris, President, Huon Resource Development Group, *Committee Hansard*, 31 March 2014, p. 10; Tasmanian Special Timbers Alliance, *Submission 96*, p. 21; Ms Alison Carmichael, Chief Executive Officer, Institute of Foresters Australia, *Committee Hansard*, 6 May 2014, p. 2.

73 Mr Andrew Denman, Spokesman, Tasmanian Special Timbers Alliance, *Committee Hansard*, 31 March 2014, p. 16.

74 Mr Andrew Denman, Spokesman, Tasmanian Special Timbers Alliance, *Committee Hansard*, 31 March 2014, p. 17.

consequences of any World Heritage nomination of places in Tasmania and that any such nomination will only occur after the fullest consultation'.⁷⁵

2.56 The Tasmanian Farmers and Graziers Association were similarly concerned that private landowners were excluded from the Tasmanian Forest Agreement process which led to the boundary extension.⁷⁶ The Association also pointed to the lack of information provided to landholders whose properties might be affected:

The failure to undertake a simple communication process with landowners underscores the greater failure of the World Heritage Extension process and, more broadly, the Tasmanian Forest Agreement in garnering broad community support.⁷⁷

2.57 The Tasmanian Farmers and Graziers Association concluded that:

...there has been a critical failure in not only engaging with the community but in providing adequate and relevant information to those most impacted. Ultimately, this has contributed to a feeling of distrust and suspicion about the process and its authenticity.⁷⁸

2.58 However, the committee received evidence which expressed support for, and confidence in, the 2013 process, including the Tasmanian Forest Agreement and the independent verification process leading up to the World Heritage nomination.⁷⁹ For example, the Florentine Protection Society claimed that, as a result of the independent verification process and Tasmanian Forest Agreement:

...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.⁸⁰

2.59 Indeed, the committee heard from a number of witnesses who were involved in the Independent Verification Group (IVG) process.⁸¹ One member of the IVG, Professor Brendan Mackey, told the committee that the IVG undertook 'the most

75 Mr Andrew Denman, Spokesman, Tasmanian Special Timbers Alliance, *Committee Hansard*, 31 March 2014, p. 16; see also Ms Alison Carmichael, Chief Executive Officer, Institute of Foresters, *Committee Hansard*, 6 May 2014, p. 2.

76 Tasmanian Farmers and Graziers Association, *Submission 13*, p. 4.

77 Tasmanian Farmers and Graziers Association, *Submission 13*, p. 5.

78 Tasmanian Farmers and Graziers Association, *Submission 13*, p. 5.

79 See, for example, Florentine Protection Society, *Submission 18*, pp 2–3; Friends of the Great Western Tiers, *Submission 32*, pp 1–2; The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, pp 9–10; Friends of the Earth, *Submission 7*, p. 3.

80 Florentine Protection Society, *Submission 18*, pp 2–3.

81 For example, Professor Brendan Mackey, *Submission 9* and *Committee Hansard*, 6 May 2014, pp 9–16; Mr Peter Matthews, *Submission 16* and *Committee Hansard*, 6 May 2014, pp 9–16; Mr Peter Hitchcock AM, *Submission 25* and *Committee Hansard*, 31 March 2014, pp 38–46; Mr Sean Cadman, *Submission 26* and *Committee Hansard*, 31 March 2014, pp 38–46.

comprehensive, regional-scaled environment and heritage forest evaluation ever undertaken in Australia' and that:

Our approach was thoroughly reviewed by the reference group of signatory representatives and also by expert peer review...⁸²

2.60 Professor Mackey expressed the view that the Government's 2013 proposal:

...was based on a detailed examination of each relevant forest block in terms of OUV and integrity, connectivity and restoration context and in my professional opinion was a first class proposal that is consistent with the evidence and conclusions of the IVG.⁸³

2.61 The committee also received evidence from Mr Peter Matthews, the project manager for the IVG. Mr Matthews explained that the IVG 'conducted a lot of research over five months'. Their work included meetings and consultation with a signatories reference group, which 'covered the spectrum of parties ranging from forestry through to conservation'. He also stated that the research and verification work was undertaken independently 'without any political interference or any cross-sector interference', and that it was a 'very transparent process'—all the work and reports were made publicly available.⁸⁴

2.62 In response to the committee's questioning, a representative of the Department of the Environment acknowledged that 'the 2013 independent verification process was extremely detailed' and 'thorough'.⁸⁵

Social and economic outcomes

2.63 The final rationale in the Government's 2014 boundary modification proposal is encompassed in the statement that the proposal 'will deliver additional economic and social outcomes' and that:

The Australian Government believes there should be a long term sustainable forest industry in Tasmania. The proposed amendment to the World Heritage Area boundary extension will assist the long term viability of the special species timber sector and local communities...⁸⁶

2.64 The intention to log the delisted areas appears to be confirmed from the evidence received by the committee. A departmental representative confirmed that the new Tasmanian Government has indicated that, if the land is excised from the World

82 Professor Brendan Mackey, *Committee Hansard*, 6 May 2014, p. 10; see also Mr Peter Matthews, *Committee Hansard*, 6 May 2014, p. 13.

83 Professor Brendan Mackey, *Submission 9*, p. 4.

84 Mr Peter Matthews, *Committee Hansard*, 6 May 2014, pp 9–10.

85 Department of the Environment, *Committee Hansard*, 6 May 2014, p. 20.

86 Australian Government, *Proposal for a Minor Modification to the Boundary of the Tasmanian Wilderness World Heritage Area*, 31 January 2014, pp 8–9.

Heritage area, it is proposed to 'be added to the Future Potential Production Forest zone'.⁸⁷

2.65 Many submitters expressed the view that providing access to the delisted areas for forestry-related activities is the Government's main reason for removing the areas from the Tasmanian Wilderness World Heritage Area.⁸⁸ Mr Bayley from The Wilderness Society was concerned that the proposal:

...is deeply political and ideological in its motivations and is explicitly driven by a policy to open up this area for logging. It appears to have absolutely no appreciation for World Heritage criteria or processes and certainly shows a deep lack of respect for the World Heritage Convention.⁸⁹

2.66 The Wilderness Society, ACF and Environment Tasmania argued that the proposal 'arises—at least partly—from a political commitment to the logging industry'.⁹⁰

2.67 The committee notes that, during the 2013 federal election campaign, the Coalition stated that it would seek to have the World Heritage extension removed.⁹¹ The Department of the Environment's evidence indicated that the starting premise of the boundary modification proposal was indeed the election commitment made by the Coalition in 2013 to seek a reduction in the World Heritage boundary.⁹²

Impact on the Tasmanian Forest Agreement

2.68 Some submitters also expressed concern the proposed revocation will undermine the Tasmanian Forest Agreement.⁹³ The committee heard from some witnesses and submitters that the Tasmanian Forest Agreement and resultant World Heritage extension had resolved decades of conflict in Tasmania over the area. For

87 Mr Stephen Oxley, First Assistant Secretary, Wildlife, Heritage and Marine Division, Department of the Environment, *Committee Hansard*, 6 May 2014, p. 26.

88 See, for example, The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, pp 2, 21 and 26; Florentine Protection Society, *Submission 18*, p. 3; Markets for Change, *Submission 30*, p. 3; Mr Geoff Law AM, Expert Consultant, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 7; Mr Tom Baxter, *Committee Hansard*, 31 March 2014, p. 48.

89 Mr Vica Bayley, Tasmanian Campaign Manager, The Wilderness Society, *Committee Hansard*, 31 March 2014, pp 1–2.

90 The Wilderness Society, ACF and Environment Tasmania, *Submission 23*, p. 26.

91 *The Coalition's Economic Growth Plan for Tasmania*, p. 18, [http://lpaweb-static.s3.amazonaws.com/The%20Coalition%E2%80%99s%20Economic%20Growth%20Plan%20for%20Tasmania .pdf](http://lpaweb-static.s3.amazonaws.com/The%20Coalition%E2%80%99s%20Economic%20Growth%20Plan%20for%20Tasmania.pdf) (accessed 25 March 2014).

92 Dr Kimberley Dripps, Deputy Secretary, Department of the Environment, *Committee Hansard*, 6 May 2014, p. 20.

93 West Wellington Protection Group, *Submission 20*, p. 1; Mr Vica Bayley, Tasmanian Campaign Manager, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 4; Florentine Protection Society, *Submission 18*, p. 4. Note, however, the discussion earlier in this chapter that some submitters and witnesses had expressed concerns about the TFA processes.

example, Mr Bayley from The Wilderness Society argued that the World Heritage extension:

...resolved 30 years worth of community, scientific and indeed committee conflict over the placement of the eastern and northern boundary of the World Heritage area.⁹⁴

2.69 The West Wellington Protection Group agreed:

...the 2013 additions to the Tasmanian WHA [World Heritage Area] were drawn up as an integral part of an over-arching agreement between broad, representative swathes of both the forestry sector and that of conservationists. This agreement represents an historical compromise between two factions that have been in conflict for generations... To wind back on the WHA extensions in 2014 would jeopardise the compromise reached and negate the years of negotiations that took place to reach this point. It would also be a betrayal and a breach of trust...⁹⁵

2.70 Mr Bayley from The Wilderness Society explained that the proposed excision 'strikes at the heart of the conservation deliverables from the Tasmanian Forest Agreement'.⁹⁶ He continued that the proposal jeopardises a 'whole range of outcomes that are on offer for Tasmania by the Tasmanian Forests Agreement', including investor and market confidence in the Tasmanian forest industry.⁹⁷ However, the committee notes that newly elected Tasmanian Government has in any case indicated its intention to repeal the Tasmanian Forest Agreement.⁹⁸

2.71 The committee notes that some of the key signatories to the Tasmanian Forest Agreement, including forest industry groups such as the Forest Industries Association of Tasmania, have expressed concern in the media about the proposed revocation and its impact on the industry.⁹⁹ Unfortunately, they did not provide evidence to this inquiry, despite the committee's repeated invitations.

94 Mr Vica Bayley, Tasmanian Campaign Manager, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 1.

95 West Wellington Protection Group, *Submission 20*, p. 1.

96 Mr Vica Bayley, Tasmanian Campaign Manager, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 4.

97 Mr Vica Bayley, Tasmanian Campaign Manager, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 4.

98 Zoe Edwards, 'Protected forests to be opened up for logging in Tasmania as peace deal dismantled', ABC News, 8 April 2014, <http://www.abc.net.au/news/2014-04-08/liberals-to-detail-plan-to-dismantle-forestry-peace-deal/5374746> (accessed 10 April 2014).

99 See, for example, Jane Calvert 'Saturday soapbox: 'Old thinking' will cost Tasmanian jobs', *The Mercury*, 22 March 2014, p. 36; Jamie Walker, 'Forest foes find common enemy in Abbott', *The Australian*, 6 December 2013, p. 1. See also Tasmanian National Parks Association, *Submission 15*, p. 3.

Impact on the forestry industry

2.72 Submitters and witnesses also cautioned that the proposed delisting could actually be detrimental to the Tasmanian forestry industry, the very industry it aims to benefit. For example, The Florentine Protection Society submitted 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.¹⁰⁰

2.73 Markets for Change similarly warned against the assumption that excising the area and opening it up for logging would benefit the forest industry:

...wood product arising from forests delisted from the Tasmanian Wilderness World Heritage Area, should such a delisting proceed, will be unacceptable in the markets. Delisting would also tarnish the reputation of wood supply from Tasmania more generally due to a sense that environmental protections are subject to reversal in this jurisdiction and that Australia does not respect World Heritage obligations. It would not only be an environmentally irresponsible course of action to proceed with the application to delist the forests, it would be counter-productive to efforts to stabilise the industry and its markets.¹⁰¹

2.74 A particular concern was expressed about access to Forest Stewardship Council certification for Tasmanian forest products. It was argued that the Government's proposal would ultimately jeopardise this certification and thus market demand for Tasmanian forest products.¹⁰² As Mr Tom Baxter observed, the problem for most of the Tasmanian forestry industry is 'no longer a supply-side one'. Rather, customers are demanding Forest Stewardship Council certification. He stated:

The problem is really a demand driven one and that Forest Stewardship Council certification that customers are now demanding...there is nothing more certain to scare customers away from Tasmanian forest products than the delisting of areas that are currently in the Tasmanian Wilderness World Heritage area and the starting up of logging there. That is going to send an appalling message internationally to the markets who are looking for...controversy-free timber.¹⁰³

100 Florentine Protection Society, *Submission 18*, p. 4.

101 Markets for Change, *Submission 30*, p. 3; see also Mr Alec Marr, *Submission 106*, p. 4.

102 See, for example, Tasmanian National Parks Association, *Submission 15*, p. 3; Australian Plants Society Tasmania, Hobart Group, *Submission 28*, pp 1–2; Florentine Protection Society, *Submission 18*, p. 4; also Jamie Walker, 'Forest foes find common enemy in Abbott', *The Australian*, 6 December 2013, p. 1.

103 Mr Tom Baxter, *Committee Hansard*, 31 March 2014, p. 50 and *Submission 105*, p. 5; see also Markets for Change, *Submission 30*, pp 1–2.

2.75 At the same time, the committee heard that the impact of the 2013 World Heritage extension on the special timbers industry and related communities has been 'devastating'.¹⁰⁴ The Tasmanian Special Timbers Alliance explained that:

Special timbers are named as such because they are truly special not only to the manufacturers and end users but because of the physical properties they contain. The majority of these timbers are slow grown and in many cases take a minimum of 200-400 years to reach commercial maturity. Species such as Celery Top Pine, Black Heart Sassafras, Myrtle, Silver Wattle and Blackwood are still commercially harvested and our other most highly valued special timbers Huon pine and King Billy pine are still available in limited quantities from salvage operations but have not been harvested commercially for decades.

The common link to all these species is that they generally come from Tasmania's old growth rainforest areas...¹⁰⁵

2.76 The Tasmanian Special Timbers Alliance submitted that, prior to the Tasmanian Forest Agreement, Forestry Tasmania's 2010 *Special Timbers Strategy* had set aside '97,300ha of specialty timber rich areas'. The Alliance submitted that:

...15,600ha of this 97,300ha, including some of the best stands of non-blackwood special timbers, were reserved in the 2013 TWWHA extension. Our sector had requested that these areas not be included in the TWWHA as no wood resource supply scenarios had been conducted for special timbers during the IVG process.¹⁰⁶

2.77 The Tasmanian Special Timbers Alliance further noted that the problem was compounded because 'other large tracts of significant special timber resource were reserved under the TFA [Tasmanian Forest Agreement]'.¹⁰⁷

2.78 However, Mr Bayley from The Wilderness Society argued that the specialty timber sector 'can be accommodated within the areas that have been very specifically and very deliberately set aside for specialty timber harvest'.¹⁰⁸

2.79 The Tasmanian Special Timbers Alliance responded to this argument and noted that the Speciality Craft Timber Zone (SCTZ), which was 'meant to be the major supply area of special timbers' under the Tasmanian Forest Agreement, 'was

104 Mr George Harris, President, Huon Resource Development Group, *Committee Hansard*, 31 March 2014, p. 12.

105 Tasmanian Special Timbers Alliance, *Submission 96*, p. 2.

106 Tasmanian Special Timbers Alliance, *Submission 96*, p. 10; see also Forestry Tasmania, *Special Timbers Strategy*, February 2010, <http://www.forestrytas.com.au/uploads/File/pdf/pdf2010/special%20timbers%20strategy%20ssml.pdf> (accessed 8 May 2014).

107 Tasmanian Special Timbers Alliance, *Submission 96*, p. 11.

108 Mr Vica Bayley, Tasmanian Campaign Manager, The Wilderness Society, *Committee Hansard*, 31 March 2014, p. 6; see also Tasmanian Government, *Special Species*, <http://www.forestsagreement.tas.gov.au/supporting-our-industry/special-species/> (accessed 8 May 2014).

chosen by ENGO [environmental non-government organisation] Signatories without any input from the special timber sector'. The Alliance raised concerns that the areas set aside contain 'little in the way of speciality timbers for the industry'.¹⁰⁹ The Tasmanian Special Timbers Alliance explained that:

If the SCTZ, at 37,954ha, was largely made up of high quality specialty timber areas then the industry was looking at a 40-50% reduction in available special timber harvest areas. Now that the SCTZ has been proven to consist of very poor quality and unsuitable special timber areas...this figure would be around an 80% reduction in available areas for non-blackwood special species harvesting – a shocking outcome for the industry.¹¹⁰

2.80 The committee further notes that a Special Timbers Management Plan was to have been prepared under the Tasmanian Forest Agreement.¹¹¹ However, the committee received little evidence on this and is unclear as to the status of this plan.

2.81 The committee also heard evidence that the World Heritage listing would not necessarily preclude access to the area by the special timber industry. Mr Tom Baxter told the committee that:

If the specialist species industry believe they can extract their wood without having a significant impact and can do it consistently with the World Heritage Convention then legally under Australian law it could occur at the moment. We do not need to be seeking a delisting...¹¹²

Other social and economic impacts

2.82 Submitters also expressed concern about the proposed excision and its impact on other sectors of the Tasmanian economy, in particular, on the tourism industry.¹¹³ For example, Mr Peter Hitchcock noted that the World Heritage Convention requires parties:

...to provide opportunities for people to appreciate a World Heritage area. Some of the areas that have been proposed for delisting I would regard as being prime examples of opportunities for nature based tourism...In particular, the Upper Florentine, the Weld, Mount Wedge and, especially, the Navarre Plain, are all areas which—because they are on the eastern side of the World Heritage area and are already accessible from Hobart—would be opportunities foregone. In the case of the Upper Florentine there are

109 Tasmanian Special Timbers Alliance, *Submission 96*, p. 4 and see further pp 5–9.

110 Tasmanian Special Timbers Alliance, *Submission 96*, p. 11.

111 Tasmanian Government, *Special Species*, <http://www.forestsagreement.tas.gov.au/supporting-our-industry/special-species/> (accessed 8 May 2014).

112 Mr Tom Baxter, *Committee Hansard*, 31 March 2014, p. 49.

113 See, for example, Friends of the Earth, *Submission 7*, p. 2; Tasmanian National Parks Association, *Submission 15*, p. 3; Florentine Protection Society, *Submission 18*, p. 2; West Wellington Protection Group, *Submission 20*, p. 2; Dr Kevin Kiernan, *Committee Hansard*, 31 March 2014, p. 37.

already world-famous walking tracks through the area that is proposed to be delisted.¹¹⁴

2.83 The Tasmanian National Parks Association observed that 'the outstanding natural and cultural values currently protected within Tasmania's national parks and WHA are one of the central tenets of Brand Tasmania'. TNPA were concerned that the proposed delisting, and any subsequent logging, could result in a World Heritage 'in danger' listing which could be a 'disaster' for the Tasmanian tourism industry.¹¹⁵

114 Mr Peter Hitchcock AM, *Committee Hansard*, 31 March 2014, p. 39.

115 Tasmanian National Parks Association, *Submission 15*, p. 3.