

The Tasmanian Wilderness World Heritage Area: World Heritage in Danger



**A statement of threats to World Heritage values
from logging in Tasmania**

**A response to state party report—WHC-06/30.COM/7B
The Huon Valley Environment Centre
The Wilderness Society**



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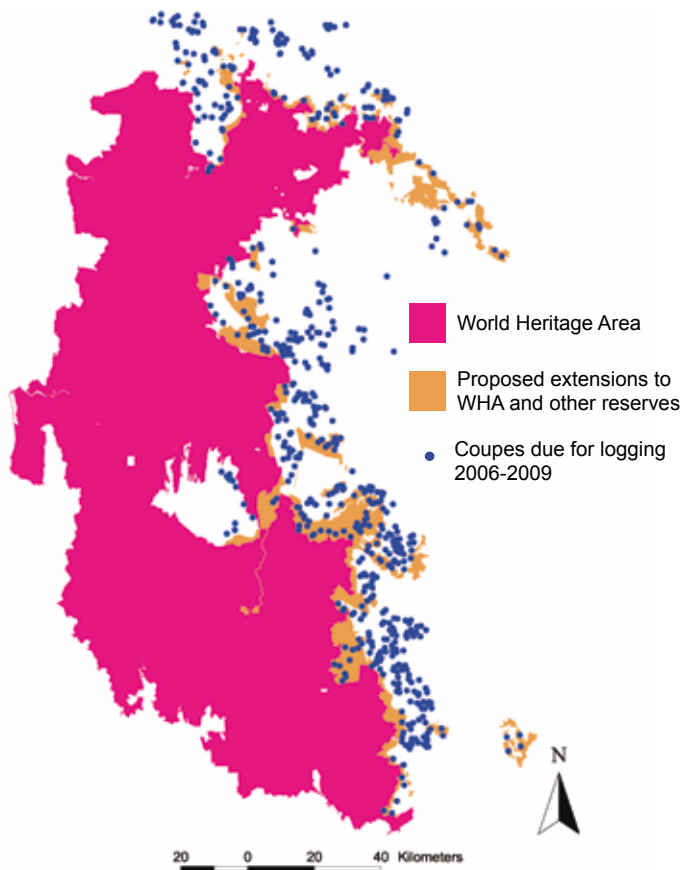


Executive Summary

The Australian island of Tasmania is home to one of the Earth's last great remaining temperate wilderness areas. The Tasmanian Wilderness World Heritage Area (TWWHA) provides protection for parts of this unique and fragile landscape. However, along the fringes of the TWWHA, pristine eco-systems that are an intrinsic part of the Tasmanian wilderness face escalating destruction from industrial activities.



 TWWHA



Logging, roading and other industrial activities are infiltrating remote wilderness areas and destroying pristine ecosystems with world heritage values along the fringes of the TWWHA as well as threatening the values and integrity of the TWWHA itself.

Native forest logging planned for 2006–2009 within proposed extensions to the Tasmanian Wilderness World Heritage Area



There are many primeval valleys of unlogged forest immediately adjacent to the TWWHA which contain World Heritage values in their own right. Their attributes include ancient forests, giant trees (up to 96 metres tall and 19 metres in girth), wild rivers, karst systems that include intricate cave formations, and Aboriginal heritage in the form of rock art on the walls of caves.



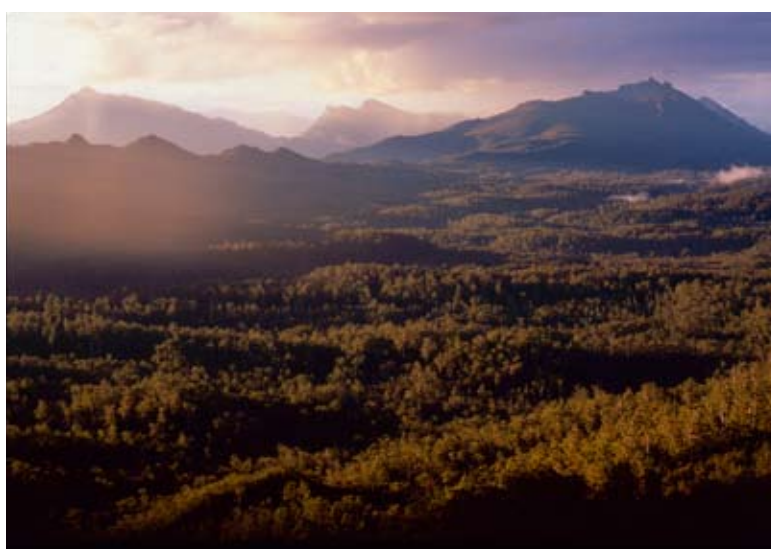
This cave-system occurs in the middle Huon, in pristine forests within three kilometres of the boundary of the World Heritage Area. Experts have recommended the addition of this area to the TWWHA.



Rock art similar to that pictured has been discovered in threatened forests in a pristine valley adjacent to the World Heritage Area.

These areas have been recommended for inclusion within the TWWHA by local, national and international authorities, including ENGOs, state agencies and the IUCN. They include crucial parts of the valleys of the Weld, middle Huon, Picton, upper Denison, Styx, Tyenna, Florentine, Gordon, Counsel, upper Derwent, Navarre, Mersey and Meander rivers.

Bodies that have called for these extensions to the World Heritage Area include the IUCN, the Australian Heritage Commission, the Tasmanian Department of Parks Wildlife and Heritage, and the World Heritage Bureau.



This valley contains oldgrowth forests and rainforests; giant trees; cave systems; habitat of rare and threatened species; and Aboriginal heritage. The area is threatened by logging. It is bordered on three sides by the Tasmanian Wilderness World Heritage Area. The mountains in this photo are within the TWWHA while most of the forests are threatened by logging.



Expanded logging and road construction into these places pose threats to the TWWHA including:



Logging in the Weld Valley is occurring within a few hundred metres of the World Heritage Area. A proposed extension in this valley contains ancient forests, karst and a wild river. This wilderness is threatened by new logging roads and logging.

- loss of wilderness quality within the TWWHA due to industrial activities and expanded mechanised access into previously remote valleys;
- loss of visual quality: view-fields are interrupted by alterations and damage caused by logging and roading;

- impacts on rare and endangered species: logging and burning may impact on communities of threatened species inside the TWWHA, especially populations of highly mobile threatened species such as the Tasmanian Wedge-tailed Eagle, White Goshawk and Tasmanian Devil. A recent decision by the Australian Federal Court said that Tasmania's reserve system and forestry management prescriptions were not sufficient to protect certain endangered species;

The Tasmanian wedge-tailed eagle is listed as endangered by the Australian and Tasmanian Governments. It nests in large trees in oldgrowth forests. The Australian Federal Court found that logging was threatening the eagle and that the forestry provisions of the Tasmanian and Australian Governments fail to protect the eagle.



This escaped regeneration burn incinerated over 1500 hectares of adjacent country in March 1998. The World Heritage Area is threatened by similar escapes which can damage sensitive alpine vegetation beyond repair.

- fire escape: there is an ongoing risk of high-intensity burns and unplanned fires escaping into the TWWHA. Such fires have the potential to destroy sensitive alpine and sub-alpine vegetation such as communities of native pine and rare deciduous trees. These eco-systems have not evolved to adapt to fire and would take thousands of years to recover from being burnt;



- weed and disease incursion: industrial activity raises the risk of transmission of weeds and diseases such as the root-rot fungus *Phytophthora cinnamomi* through the movement of harvesting machinery, recreational vehicles and human activity;
- risks from increased human access: damage caused by irresponsible or unmanaged recreational activities or vandalism (which can damage sensitive cave systems and Aboriginal rock art), poaching (especially of rare conifers such as the Huon Pine), and deliberate or accidental fires.

Elimination of these threats is essential to secure the values and integrity of the TWWHA over the long term. A cessation of logging and road construction activity in pristine forests adjacent to the TWWHA and the establishment of adequate formal reserves would greatly reduce the risk to this outstanding temperate wilderness zone.



New roading and logging—partly funded by the Australian taxpayer—penetrates a valley that the Australian Government promised to protect in October 2004. The Government admits that it failed to keep its promise.



Introduction

This document presents responses and comments regarding statements and representations contained in State Party Report WHC-06/30.COM/7B.

State Party Report WHC-06/30.COM/7B was prepared by the Tasmanian and Australian Governments following discussion of threats to the TWWHA at the World Heritage Committee meeting in Vilnius, July 2006. The State Party was asked to prepare and submit a 'report on progress on the issues identified' by NGOs. Those issues relate to the impact of logging, burning, roading and associated activities on the values and integrity of the TWWHA.

The State Party report seeks to present the view that industrial logging, burning and roading activities occurring in wilderness areas adjacent to the TWWHA do not pose a threat to the values and integrity of the world heritage property.

The report fails to adequately address a number of concerns raised before the Vilnius meeting. In particular, it fails to address concerns or demonstrate progress regarding specific logging coupes and operations in identified areas such as the Lower Weld Valley and Upper Florentine Valleys. While information regarding general Tasmanian forest practices is provided at length, discussion of specific, identified threats and progress made on mitigating threats is minimal.

Where NGO concerns are addressed, the report contains factual errors and misleading statements.

The report focuses on four main issues: the regulatory and legislative 'tools' used to manage forestry operations, the intent and outcome of previous assessments undertaken, the amount, impact and intensity of logging operations adjacent to the TWWHA and the status and management of wilderness areas adjacent to the TWWHA.

In all these key areas the report contains factual errors and misleading interpretations.

This response seeks to provide clarification and accuracy.

In summary, The Huon Valley Environment Centre and the Wilderness Society (Tasmania) Inc. (the respondents) argue that State Party Report WHC-06/30.COM/7B is symptomatic of a short sighted, reactive management approach which fails to implement tangible measures to mitigate identified threats to the integrity of the TWWHA and wilderness areas which are an intrinsic part of this world heritage valued landscape.



Structure of response

This response is structured around the issues raised in the State Party report. It presents responses and clarification in relation to each of the main issues raised.

The main issues raised within the State Party report were:

- the legislative and regulatory ‘tools’ used to ensure the integrity of the TWWHA;
- the intent and outcome of previous assessment processes, including the TWWHA nomination process;
- the amount, impact and intensity of logging and roading activities adjacent to the TWWHA boundary;
- the status and management of wilderness areas adjacent to the TWWHA.

The State Party response is divided into three areas: an introduction, which largely deals with peripheral issues of general forest management and legislation, the main ‘Report on Progress’ which deals with issues of threats to the integrity of the TWWHA, and an appendix which deals with concerns about the management of ‘aspirational areas’. The respondents take the view that NGO concerns about the management of adjacent ‘aspirational’ areas are directly related to concerns about the integrity of the existing TWWHA. Therefore, this response deals with concerns about the integrity of the TWWHA and the management of adjacent wilderness areas as one and the same issue.

1.0 Legislative and regulatory ‘tools’

The State Party Report suggests that the integrity of the TWWHA is safeguarded—that the area is ‘well protected’—by the existence of a number of regulatory and legislative mechanisms which constitute ‘tools’ that are ‘used to conserve and manage various values, both inside the TWWHA and in adjacent lands,’ (Commonwealth of Australia, 2007. p5.). Whilst this discussion is not specifically related to the management of areas adjacent to the TWWHA, or to the progress of mitigation measures, it is relevant to a general assessment of threats to the TWWHA.

The respondents note that these ‘tools’, whilst sometimes admirable in their objectives, do not provide an adequate safeguard against threats to the TWWHA outlined by NGOs. In many cases, the stated ‘tools’ used to safeguard the TWWHA:

- do not provide a capacity to ensure the integrity of the TWWHA;
- do not have maintenance of the integrity of the TWWHA as an objective;
- have been shown to be contravened, broken or ignored by logging operators;
- are not adequately funded or maintained to monitor or mitigate threats to the TWWHA;
- are tokenistic or ineffectual.

1.1 TWWHA Management Plan and State of the TWWHA Reporting.

The TWWHA Management Plan sets out specific management requirements to be met by the managing agency, the Tasmanian Parks and Wildlife Service (PWS). It includes requirements to seek to ensure that adjacent area management is sympathetic to the management objectives of the TWWHA and does not detract from the values of the WHA or the presentation of those values



(Parks and Wildlife Service, 1999 p201-205). PWS are asked to ‘encourage’ and ‘provide guidance’ on sympathetic land use.

However, there is no mechanism to enforce sympathetic land use. These requirements do not bind adjacent landholders. Sole responsibility to ensure sympathetic land use and to minimise threats arising from adjacent land use rests with the PWS, which has no control over adjacent land-users such as forestry agencies.

The 2004 State of the Tasmanian Wilderness World Heritage Area report identified changes to adjacent area management which had ‘variously affected the protection and presentation of the TWWHA and its values.’ It was noted that ‘Forestry activities expanded into the southeastern border region of the TWWHA,’ (Parks and Wildlife Service, 2004 p29). This expansion has affected the protection and presentation of the TWWHA and its values.

However, due to funding and time restrictions, the PWS are not able to adequately monitor and respond to threats. As the 2004 State of the TWWHA evaluation states: ‘Key stakeholders identified the slow response and/or low priority given to managing impacts and threats to sensitive areas and values as a key factor limiting management performance for the protection and conservation of values. Staff of the managing agency with responsibility for implementing prescribed actions of the management plan identified a lack of funding or insufficient time.’ (Parks and Wildlife Service, 2004).

The TWWHA management plan and WHA management system do not provide an adequate capacity to secure the values or integrity of the WHA from threats arising from adjacent land use.

1.2 The Reserve Management Code of Practices

This document relates only to the internal management of existing reserves. It does not include any reference or prescriptions regarding management of adjacent lands and potential impacts on reserve values and integrity (Parks and Wildlife Service, 2003).

This Code of Practice is therefore irrelevant to the concerns of ENGOs regarding threats to the integrity of the TWWHA from logging in proximity to the boundary.

1.3 The Inter-Agency Fire Management Protocol

Whilst the Fire Management Protocol is supposed to provide a capacity to react to fire events and escaped high intensity burns, it has not proven capable of controlling regular fire escape across the state. The State Party report focuses on the reactive capacity of the combined service to respond to fires. Past evidence of escaped fires clearly demonstrates that this reactive capacity is not sufficient to manage the problem (see section 3.3.1 for details).

When high intensity burns are used in remote wilderness areas, in steep terrain with thick vegetation, or adjacent to the TWWHA, swift response and control are even harder. The TWWHA Management Plan notes that ‘the logistics of transporting fire fighting crews into remote locations’ limit the ability of the Service to suppress fires (Parks and Wildlife Service, 1999. p107). As global warming will lead to an increase in the number of days of high fire danger, dryer vegetation and aggravated fire conditions, the task of reacting to fire events will be made more difficult (Senator Ian Campbell, 2006).



1.4 The Forest Practices Code (Tasmania)

The Tasmanian Forest Practices system is a weak, self-regulated system that does not adequately safeguard natural values in Tasmanian forests. The Forest Practices Code (FPC) provides no assurance that logging operations will not impact upon the values or integrity of the TWWHA.

The State Party report suggests that the FPC safeguards all natural values in Tasmanian production forest. It further suggests that logging and roading operations occurring adjacent to the TWWHA will not threaten the values or integrity of the WHA because they are governed by the Tasmanian Forest Practices Code.

The Forest Practices Code is a set of prescription and guidelines governing forest operations in Tasmania. It is implemented by Forest Practices Officers and administered by the Forest Practices Authority (formerly Forest Practices Board). The forest practices system has a number of significant failings:

- it is effectively self regulatory (Forest Practices Officers are employed by logging companies);
- many sections of the code are only 'guidelines' and are often unenforceable;
- numerous breaches of the code occur and many are not penalised;
- the code allows for ongoing destruction of habitat for endangered species;
- FPC prescriptions meant to safeguard natural values in logging coupes, such as requirements for stream-side reserves, are often ignored or undermined.

Bill Manning, a former senior Forest Practices Officer employed by the Forest Practices Board (now Forest Practices Authority) told The Australian Senate Rural and Regional Affairs and Transport References Committee that:

'The accelerated and unaccountable logging industry which is overseeing the wholesale destruction of native forests... is doing so in many cases in areas which are unique in the world for their flora and fauna... The complete failure to adequately and responsibly assess and protect the flora and fauna of Tasmanian forests by the Forest Practices Board is of grave concern,' (Commonwealth of Australia, 2003).

A recent decision of the Federal Court of Australia has found that FPC prescriptions have not adequately protected endangered species and that logging operations, conducted under the FPC have had a significant impact on threatened species including the Tasmanian Wedge-tailed Eagle, The broad-toothed stag beetle and swift parrot (Marshall J, *Brown v Forestry Tasmania*, Federal Court of Australia, 2006).

There are numerous instances of activities which pose damage to natural values occurring despite the existence of the FPC, or with the approval of the FPC. There is a clear potential for such activities to occur in areas adjacent to the TWWHA, with a corresponding impact on World Heritage values and integrity.

Specific activities include (but are not limited to):

- Clearfelling and reduced wilderness quality, biodiversity and soil health in forest areas subject to logging: A scientific study comparing oldgrowth tall eucalypt forest with re-growth forest in the Lower Weld Valley found that logging oldgrowth forest significantly alters the diversity and abundance of plants and invertebrates. Poor soil structure, lack of soil humus, root and crown competition were also noted. The study concluded that native forests managed on short rotation cycles will never reproduce the diverse micro-habitats which characterise old forests (Green, G. Gray, A. McQuillan, P. 2004).



- Destruction of habitat for rare and endangered species: Oldgrowth Eucalypt and rainforests provide habitat for numerous endangered species. Many of these rely on holes found only in oldgrowth trees. Logging has a significant and cumulative impact on these by reducing their habitat (Federal Court of Australia. 2006).
- Numerous instances of high intensity burns escaping prescribed boundaries and burning native forest: see section 3.3 for detailed list.
- Damage to streams and watercourses with associated impacts on rare and threatened species such as the Giant Freshwater Crayfish and Platypus (Commonwealth of Australia, October 2003).
- Use of potentially contaminated machinery: Logging operators are required to ensure that machinery is free of dirt, mud and contaminants which may transfer weeds and diseases such as the root rot fungus *Phytophthora cinnamomi*. The potential for spread of these weeds and diseases into areas adjacent to the TWWHA and the TWWHA itself has been noted by NGOs. In February 2007, the Wilderness Society reported a breach of the FPC and FPP in the Upper Florentine valley. Three machines were brought into pristine forest without being washed down. We are concerned that this is a regular occurrence, even in coupes next to the TWWHA (The Wilderness Society (Tasmania) Inc. Media Release, 2007).
- Construction of roads and disturbance in close proximity to sensitive karst formations of extremely high conservation significance. In 1998-99 Forestry Tasmania built a logging road just 40 metres from the entrance of a streamsink swallet in the Middle Huon area which was part of a complex of sensitive karst formations. Soil disturbance has led to silt and mud run-off into the karst and remedial work is inadequate (McKinnon Janine, 2002).

The FPC covers logging operations directly adjacent to the TWWHA. However, it does not include specific prescriptions or guidelines to ensure that operations will not affect the values or integrity of the WHA. The only relevant prescription is a non-enforceable motherhood statement: 'Natural and cultural values of adjacent reserves should be considered during the planning and conducting of forest operations,' (Forest Practices Board. 2000. p51).

These documented failings of the FPC demonstrate that forestry operations pose a threat to the natural values of wilderness forest areas. As the impact of these operations will also bear upon natural features and ecosystems within close proximity, they also represent a threat to the values and integrity of the adjacent TWWHA.



1.5 Forestry Tasmania's 'Forestry in the Landscape' Approach.

High impact logging operations, including large-scale clearfelling, high-intensity burning, cable logging and extensive road construction are occurring, or planned to occur, in old-growth and wilderness forest areas in close proximity to the TWWHA boundary. Oldgrowth Eucalypt and mixed forest with rainforest understorey in the proximity of the TWWHA border are still subject to these logging techniques.



Stage one of a clearfell logging operation in coupe WR012C, Lower Weld Valley, April 2007.



Impact of clearfelling in coupe WR012C, Lower Weld Valley



Initial clearfelling activity adjacent to the TWWHA boundary in coupe WR015F, Lower Weld Valley



The State Party report claims that Forestry Tasmania implements a transition of forest management practices to reflect the proximity of the TWWHA. It is claimed that intensive or high impact forestry operations do not occur in the vicinity of the TWWHA border. The respondents note that this statement is wrong.

Statements about a phase-out of clearfelling and a move to ‘non-clearfell’ methods in sensitive areas are misleading. The State Party report claims that ‘non-clearfell’ techniques will enhance landscape and biodiversity outcomes in the management of wet eucalypt forest. However, ‘non clearfell’ techniques still involve extensive areas of clear cutting, with comparable impacts.



Extensive clearcutting of pristine forests in non-clearfell coupe BB021C, Lower Weld Valley

Burning practices are still employed and many areas of retained forest within logging coupes are either burned or subject to pressures from penetration of wind, sunlight and adverse weather (‘the edge effect’). ‘Non clearfell’ techniques do not materially reduce the landscape and biodiversity impacts of logging in these sensitive areas (see section 3.2 for more information).

There is no effective transition of management practices to reflect the proximity of the TWWHA or the wilderness values of forests subject to harvesting. An effective transition would involve a cessation of harvesting in areas close to the TWWHA boundary.



Tasmania’s wilderness is invaded by new logging roads and so-called ‘non-clearfell silviculture’. The logging includes large areas of cleared forest. The retained clumps have been burnt by the forestry burn-off. This activity is clearly incompatible with the values of the adjacent TWWHA, less than 2km away. This is an area identified as an proposed extension to the TWWHA by ENGOs, scientists, other independent experts and the IUCN.



1.6 The 'Giant Trees Policy'

The 'Giant Trees policy' is a tokenistic and reactive strategy. Individual trees above 85 metres in height, or with a mass above 280 cubic metres estimated stem volume, are protected within small buffer reserves (generally of approximately 100 metres radius). There is no systematic attempt to identify or map giant trees. The policy relies on reports from the public and logging contractors. The policy provides no guarantee against destruction of outstanding examples of tall eucalypt forest. There are no penalties for the logging of trees which meet the requirements for protection under the policy.

There are documented and infamous examples of the failure of Forestry Tasmania's Giant Tree policy to protect the trees concerned, including:



- El Grande—Australia's most massive known tree—killed by a forestry burn within a few kilometres of the TWWHA in 2003;
- Giant Blue Gums discovered by a giant tree enthusiast at the edge of a clearfelled area on the slopes of the Snowy Range, a few kilometres from the TWWHA. The adjacent logging operation may have destroyed trees equal or taller in height and posed damage to the retained blue gums;
- Gandalf's Staff in the Styx Valley - remained threatened by logging for two years after it was first brought to the attention of Forestry Tasmania.

El Grande was 'protected' as a giant tree. It was killed in a forestry burn in 2003, and crashed to the ground in 2007.

1.7 The Warra Long Term Ecological Research site

Whilst the Warra site is utilised for scientific research it is also subject to high-impact logging operations including clearfelling, cable logging, high intensity burning and road construction. Many of these activities are occurring or planned to occur in pristine forests directly adjacent to the TWWHA and have been raised in earlier NGO reports. The current and planned use of the area is not contributing to the protection of World Heritage values and/or integrity.



1.8 The EPBC act

The Commonwealth Environment Protection and Biodiversity Conservation legislation is meant to ensure that any individual or group undertaking actions which damage environmental values, including World Heritage values of World Heritage areas, will be penalised. As RFA forestry operations are exempt from this legislation, the EPBC legislation cannot be seen to protect the values or integrity of the TWWHA from impacts or threats arising from logging operations and associated activity.

When the Federal Court found that logging at Wielangta in Tasmania breached both the RFA and the EPBC, the Australian Government moved not to change forestry practices, but to change the RFA (a move of dubious legality).

Clearly, the ‘tools’ used to manage natural values in Tasmanian production forests, including forested wilderness areas adjacent to the TWWHA, have significant failings. A ‘business as usual’ approach, characterised by blind faith in these ‘tools’ will not secure the values or integrity of the TWWHA.

2. Past assessments

The State Party report presents the view that past assessments and investigations of the TWWHA, the boundaries of the TWWHA and adjacent wilderness areas have endorsed the current land-use system and determined that no further protection of wilderness areas is necessary to ensure integrity or protect World Heritage values.

The report uses a selective interpretation of past assessments to present this view. The report fails to consider the full outcomes of past assessments and the documented flaws in some previous assessment processes. It presents inaccurate statements about the level of reservation and the establishment of buffer zones along the TWWHA boundary. It also includes inaccuracies regarding boundary determinations.

2.1 The Helsham Inquiry

The Commission of Inquiry into the Lemonthyme and Southern forests (Helsham Inquiry) initiated prior to the extended nomination of the (1982) TWWHA resulted in two reports, a majority and minority report. The Helsham majority decided that most of the Southern Forests did not have World Heritage values. However, this finding was repudiated by 10 of the 11 consultants to the Commission, who urged Federal Cabinet to adopt the minority report by Commissioner Peter Hitchcock instead.

Commissioner Peter Hitchcock is arguably Australia’s foremost expert on World Heritage. In his minority report he found that the whole of the Lemonthyme and Southern Forests, including unprotected wilderness areas identified by NGOs, should be added to the Tasmanian Wilderness World Heritage Area. (Hitchcock Minority Report, part of the Report of the Commission of Inquiry into the Lemonthyme and Southern Forests)

Ultimately, the federal government accepted Hitchcock’s approach and used his arguments as the basis for the successful nomination of the Lemonthyme and parts of the Southern Forests as World Heritage. However, the government drew up a ‘compromise’ boundary, which was roughly mid-way between those of Hitchcock and the Helsham majority. As a result, a highly-compromised World Heritage nomination was forwarded to the World Heritage Committee in November 1988.



2.2 World Heritage Nomination and associated assessments:

The State Party Report suggests that the World Conservation Union IUCN, and other World Heritage bodies, have endorsed the current TWWHA boundary, determined following the September 1989 extension, and condoned industrial activities occurring in adjacent areas. It also presents inaccurate views about the location of the TWWHA boundary in relation to wilderness areas.

While extensions to the World Heritage property were supported by the IUCN, the inadequate and arbitrary nature of the boundary and the problem of logging in adjacent wilderness areas were noted in IUCN Technical Evaluations of the nomination, by the World Heritage Committee (December 1989) and in subsequent resolutions of the IUCN General Assembly (1990 and 1994).

The May 1989 Technical Evaluation noted that the TWWHA boundary 'does not follow natural features as is evident from its complex convoluted design' (IUCN, 1989). Despite subsequent boundary adjustments in the September 1989 nomination, this is still a valid criticism in many areas including the Lower Weld, the middle Huon, the Styx valley, the Upper Florentine, Wylds Craig, the Counsel/Upper Derwent areas, Mt Wedge and the Navarre Plains.

In the October 1989 Technical Evaluation, it was noted that 'outside the boundaries of the site, extractive forestry operations will occur outside the eastern boundary with clear-cutting, road-building activity, the possibility of fire escape and reduction in visual quality and wilderness values.' In entering the September 1989 nominated area on the World Heritage list, the World Heritage Committee noted that 'there were some small enclaves of publicly owned land with world heritage values currently excluded from the nomination and expressed the hope that these could be added on in the future' (World Heritage Bureau, December 1989).

These concerns were shared by the Tasmanian Department of Parks, Wildlife and Heritage (now Parks and Wildlife Service) which noted that the boundary was not adequate to ensure integrity due to its unnatural configuration and industrial logging activities occurring in adjacent wilderness areas, and that a more appropriate boundary would include extensions in a number of key areas identified by NGOs (Department of Parks, Wildlife and Heritage, 1990).

In 1990 and 1994 the General Assembly of the IUCN passed resolutions noting that wilderness areas identified by NGOs and in previous reports would add further oldgrowth forest, contribute to integrity and simplify management of the TWWHA. It called for protection of all national estate areas contiguous with the current Western Tasmanian Heritage Site (IUCN, 1990).

Between 1993 and 1995, the issue of logging in wilderness areas adjacent to the TWWHA was raised in briefings to the Federal Environment Minister by the Commonwealth Department of the Environment, Sports and Territories, (Commonwealth Department of Environment, Sport and Territories, 1993) as well as in two reports prepared by leading Tasmanian scientists for the Federal Government (Kirkpatrick, J. 1994 and Blake, van Putten and Kirkpatrick, 1995). All identified logging in pristine forest adjacent to the TWWHA as a threat to World Heritage values and integrity and argued for enhanced reservation.

The World Conservation Union IUCN, World Heritage Committee, the Tasmanian Parks and Wildlife Service and leading scientists have all expressed concerns regarding the inappropriate configuration of the TWWHA boundary and threats to integrity, visual and wilderness qualities from industrial logging occurring in adjacent wilderness areas.

The State Party report states that 'In many places (e.g. the Mersey, Wedge, Florentine, Snowy Range, Weld, Picton), the boundary of the TWWHA was located in the 1989 extension nomination at the then extent of forest harvesting and logging access roads. As a consequence forestry operations and World Heritage Area management coexist.'



The respondents note that this statement is clearly inaccurate. The TWWHA boundary was located a considerable distance from the ‘then extent of forest harvesting and logging road access,’ in the Lower Weld, middle Huon, Upper Florentine, Snowy Range, Mersey, Mt Wedge and Picton (east and north-west) areas, leaving large areas of wilderness which have subsequently been recognised as valuable additions to the WHA, open to industrial activity.

This inadequate boundary configuration has led to conflicting management priorities. World Heritage Area management requires that these areas be managed with future World Heritage extension in mind or, at least, in a manner sympathetic to the maintenance of World Heritage values and integrity. Management for extractive logging prioritises increased access and industrial activity in wilderness along the fringes and adjacent to the boundary of the TWWHA.

2.3 The Regional Forest Agreement (Tasmania)

The State Party report claims that, as part of the Regional Forest Agreement (RFA) and assessments carried out as part of that agreement, wilderness areas outlined by NGOs, where industrial logging is occurring in close proximity to the TWWHA border, were adequately examined and considered not to require protection. It claims that a world heritage assessment process ensured that all world heritage values were safeguarded. It also suggests that the RFA ensures that Tasmanian forests are well managed and threatened species in forests adjacent to the TWWHA are adequately protected.

The respondents note that the RFA and associated assessment processes were fundamentally flawed. NGOs condemned the process and its failure to deliver adequate conservation outcomes. As The Wilderness Society has previously outlined, there were a number of shortcomings with the RFA, the ‘Comprehensive Regional Assessment’ (CRA) process and the ‘JANIS-CAR’ criteria used to assess forest areas:

- the JANIS-CAR criteria fail to recognise the bulk of forest biodiversity and ignore the role forests play in ecosystem services;
- there was no scientific basis to the percentage targets set for the protection of forest types. Specified targets are of a political nature only as they reflect perceived or calculated social/economic tradeoffs;
- the JANIS-CAR criteria ignore geographic variation in site productivity. The disturbance history of sites is not factored into the forest typing exercise;
- the JANIS-CAR criteria ignore the fact that landscape ecosystems, however defined, provide habitat for many more species on a seasonal and ad hoc basis than are permanently resident (Wilderness Society, 2004. Attachment A).

In a combined statement, some of Australia’s leading scientists have outlined the failings of the RFA and associated assessments. They note that:

The Tasmanian Regional Forest Agreement (RFA) is widely perceived in the scientific community to have failed to deliver the intended protection for environmental, wilderness and heritage values that state and federal governments committed to when they signed the National Forest Policy in 1992.

The scientific processes in the Tasmanian RFA were overwhelmed by political compromises. Established criteria for forest conservation were not fully applied. There are large areas of high-conservation-value forest that would have been reserved if the RFA criteria for forest conservation had been fully applied.

Logging practices and the conversion of native forests to plantations have intensified in the seven years since the signing of the RFA. This intensification, combined with the well-documented



inadequacies of the conservation reserve system (exemplified by the unprotected, large areas of unlogged *Eucalyptus regnans* tall open-forest) has produced highly modified forested landscapes with diminished landscape values. (The Wilderness Society, 2004. Attachment B).

During the preparation of this report, Forestry Tasmania advised of the ‘accidental’ logging of an area of old-growth forest protected within the Arve Loop Forest Reserve, in the Huon District state forest. The Arve Loop Reserve is a formal protected area, designed as IUCN Protected Area Category IV. Due to a planning failure, four hectares of forest in the reserve were logged during the harvesting of an adjacent coupe in early 2007. This action represents a breach of the Forest Practices Code and Forest Practices Act 1985. Instances of illegal logging of reserves and protected areas demonstrate the inadequacy of forest management systems and the potential for serious damage to protected wilderness areas such as the TWWHA.

2.3.1 World Heritage Assessment

The World Heritage Expert Panel (1997) convened during the RFA process failed to identify key wilderness areas with documented World Heritage values. In the lead-up to the RFA, two reports were carried out on the impact of logging on the TWWHA. The first of these, Assessment of Likely Impacts on World Heritage Values of Forestry Operations in Areas Proposed for Addition to the TWWHA, was carried out by Professor Jamie Kirkpatrick in 1994. These findings were backed up in a subsequent report by Blake, van Putten and Kirkpatrick—World Heritage Values on the Eastern Boundary of the World Heritage Area and their Relationship to Recent Logging and Roding Activity. Both reports recommended that two crucial wilderness areas—the Upper Florentine and the Beech-Counsel areas—had World Heritage qualities. However, when the RFA was signed in 1997, the RFA largely ignored the findings of these reports. Only 4000 ha out of 11,000 ha of the Beech-Counsel area was protected. Only approximately 1000 ha out of approximately 7000 ha in the Upper Florentine was protected.

Another major failing of the process was that issues of integrity for the existing World Heritage Area were not considered in the World Heritage Assessment process. Areas which had been identified by the Tasmanian Department of Parks, Wildlife and Heritage, IUCN and scientists as providing for the integrity of the TWWHA were not considered for protection.

2.3.2 RFA and Threatened Species

The RFA has failed to ensure protection for threatened species. The State Party Report claims that the RFA provides for the protection of all threatened species in pristine forests and wilderness areas adjacent to the TWWHA. The report suggests that the RFA ensures that logging operations will not impact on threatened species.

In 2006 the Australian Federal Court ruled that forestry operations occurring in state forest in the Wielangta area had been carried out otherwise than in accordance with the RFA. The Court found that these operations will have a significant impact on threatened species including the Wedge-tailed Eagle, Broad Tooth Stag Beetle and Swift Parrot (Federal Court of Australia. 2006).



The Federal Court found that forestry operations at Wielangta would have a significant impact on the threatened Tasmanian Wedge-tailed Eagle.





Similar operations will occur and are occurring in forest containing threatened species in wilderness areas adjacent to the TWWHA. These operations will also have a ‘significant impact’ on threatened species. There is a high likelihood that ‘significant impacts’ caused by logging in forest adjacent to the TWWHA will impact on populations of threatened species within the WHA, thus posing a direct threat to the World Heritage values of the property. Threatened species, such as the Wedge-tailed Eagle, Tasmanian Devil, Grey Goshawk, Spotted-Tail Quoll and others rely on large habitat-ranges both adjacent to and within the TWWHA.

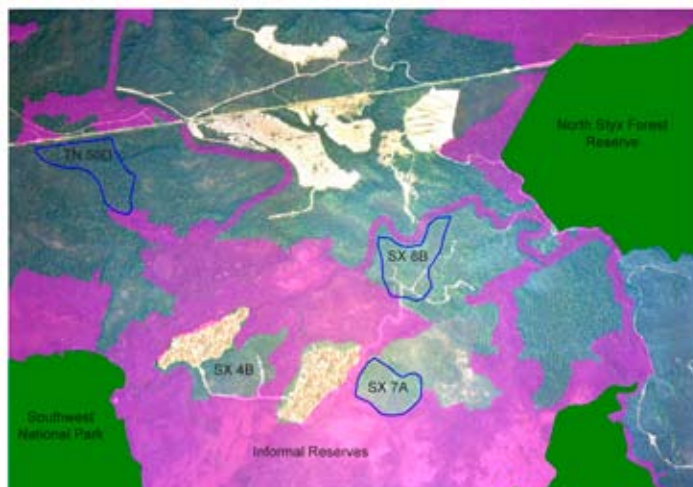
The Wielangta trial has exposed major deficiencies in the workings of Australia’s endangered-species laws as they apply in native forests subject to logging operations. Threatened species management in Tasmania has been poorly coordinated. Recovery Plans for key threatened species such as the Wedge-tailed Eagle have been allowed to lapse. The management of a destructive outbreak of the Tasmanian Devil Facial Tumor Disease has been poorly handled.

2.4 Tasmanian Community Forest Agreement (TCFA)

The Tasmanian Community Forest Agreement (TCFA) represents a missed opportunity to resolve the issues of World Heritage integrity and adjacent area management. The State Party Report states that the TCFA resulted in further reservation of wilderness forests adjacent to the TWWHA, thereby enhancing buffer zones and helping to secure the integrity of the TWWHA.

While new reserves in some areas will contribute to integrity, the respondents note that:

- Most of the new reserves declared as part of the TCFA were not adjacent to the TWWHA.
- The claimed addition of 6460 hectares to reserves along the eastern boundary of the TWWHA is inaccurate: only a small part (no more than 25%) of these reserves are adjacent to the TWWHA. There were no new reserves of any significance adjacent to the TWWHA. Approximately 30,000 hectares of old-growth forest (mostly rainforest in the Tarkine, in north-west Tasmania) has been protected inside proposed new Formal Reserves. None of these new Formal Reserves are adjacent to the TWWHA. The major Styx Valley Formal Reserve (North Styx Forest Reserve, approximately 4200 ha) is not adjacent to the TWWHA. It is separated from the TWWHA by several kilometres of threatened or logged forest.
- Many new reserves are only ‘informal’ reserves and consist of small and scattered parcels, which do not ensure ecological connectivity. The reservation status of these areas is not secure and can be revoked by a simple change of government policy (rather than by legislation in Parliament). Roading operations can also proceed through informal reserves, further undermining their conservation significance. These informal reserves largely consist of areas that were never threatened by logging because they occur on small strips of land that occur between scheduled logging areas (along streams, for example, or on steep slopes or limestone karst).
- The vast majority of the ‘new reserves’ therefore have no relevance to the future of the Tasmanian Wilderness World Heritage Area. With the exception of one such area of informal reserves in the Styx Valley, they will achieve nothing by way of protecting the integrity of the TWWHA.
- In the upper Styx, there is an area of approximately 1200 hectares of new ‘informal reserve’ immediately adjacent to the TWWHA. This could form a modest buffer were it not for the enclaves of forest scheduled for logging within its convoluted boundary.



The pink area shows an informal reserve in the Styx Valley immediately adjacent to the TWWHA. Its enclaves and convoluted design show that it allows logging to occur within it and in close proximity to the TWWHA

- No new reserves were declared in several key areas outlined by NGOs. No forest area of significance was protected in the Counsel River, Upper Derwent, Navarre / Mt Rufus, Weld, Huon or Mersey areas or in the lower Florentine. These areas are now subject to intensified logging and building of new logging roads. Many of these places were outlined for protection by the Federal Coalition Government in its election policy, but not delivered.
- Funds allocated under the TCFA, which was supposed to ensure a move out of oldgrowth logging, are being used to cut new roads into key wilderness areas adjacent to the TWWHA identified by NGOs and to support oldgrowth logging. \$20m has been allocated to 'roading infrastructure', \$13.1m to 'Alternatives to clearfelling' and \$11.4m for 'Support for special species and bee-keeping' which entails accessing and logging pristine wilderness forests.

The TCFA, whilst providing some minimal protection in some areas, actually results in an increased threat to wilderness areas and the TWWHA by providing for expanded roading and logging activities in sensitive, pristine forests close to the TWWHA.

While additional conservation gains were welcome, they have been overwhelmed by the scale and rapidity of the assault on areas just as important, and by the Australian Government's apparent intention to use taxpayers' funds to help destroy these areas' values.

3. Industrial Logging activity adjacent to the TWWHA

In the last decade, Tasmania has witnessed a major expansion of logging and road construction into pristine forests adjacent to the TWWHA. New logging roads have been built in previously inaccessible, remote wilderness areas. High-impact practices, including clearfelling, cable logging, shooting and trapping of wildlife, and high-intensity burning are still practised in close proximity to the TWWHA. 'Non-clearfell' techniques are defective and do not materially alter the impact of logging in these areas. The combined affect of these practices is a dangerous intensification of forestry activity adjacent to the TWWHA.

However, the State Party Report claims that logging, burning and roading operations occurring in state forest adjacent to the TWWHA will not affect the values and/or integrity of the TWWHA.

The report claims that:

- The area open to logging operations along the TWWHA border is not significant;
- Industrial activities in these areas have a low impact;
- Industrial activities in these areas are not intensive.



Responses to the three key points noted above will be given in order.

3.1 Extent

As NGOs have previously outlined, there are large areas (at least 40,000 ha) of pristine forest adjacent to the TWWHA which are open to logging as well as numerous logging coupes and planned roads where industrial activity is occurring and will commence, in close proximity to the TWWHA.

The State Party report claims that the amount of logging, roading and burning activity occurring in close proximity to the TWWHA is not extensive. However, no figures or information regarding the number of coupes, length of new roading or area to be harvested have been supplied.

The claim that extensive areas of unreserved forest adjacent to the TWWHA are ‘set aside from harvesting by Forestry Tasmania through the forest planning process’ is misleading. Whilst small patches of steep and less productive land are left off harvesting schedules, the vast majority of state forest in wilderness areas identified are available for logging and divided in logging units (coupes). Furthermore, the claim that most wilderness areas identified by NGOs are ‘fully protected in reserves’ is false. Significant parts of the Lower Weld, Middle Huon, Styx, Counsel-Derwent, Upper Florentine and other areas are not protected.

An examination of areas identified by NGOs where logging, roading and burning is occurring or is planned to commence shows that large areas of forest, much of it in a pristine state and wilderness setting, is available for logging. There are a significant number of coupes planned to be harvested in these areas in the next three years and extensive roading operations (Forestry Tasmania. Three Year Wood Production Plan. 2006-2009.)

In some regions, such as the Upper Florentine, logging operators are seeking to establish access to areas that have not yet been subject to any previous industrial activity . The amount of harvesting in these areas is not yet significant but will increase if roading plans are allowed to proceed.

New proposed logging roads in the Lower Weld, the Great Western Tiers and Upper Mersey, the Navarre forests near Lake St Clair, the Derwent / Counsel River areas south of Lake St Clair, the forests of the lower Florentine and Blue Creek at the foot of Wylde's Craig, Mt Wedge, forests adjacent to the Mt Field National Park, the Styx valley, the slopes of the Snowy Range, the Middle Huon, the Picton Valley and the Lune River / Hastings / Esperance area will open up access to thousands of hectares of wilderness along the fringes of the TWWHA. Aside from planned logging operations, these new roads will create increased human access and access for other industrial activities (for example mining). Already, mining companies with leases in the Lower Weld Valley have indicated that access through new logging roads increases the likelihood of mining activity commencing.

A misleading and inaccurate map is also used to present the view that logging and roading activities adjacent to the TWWHA are not extensive. The map does not adequately identify or detail ‘other use zones directly adjacent to the boundary.’ While the map does show, in no detail, boundaries between State Forest, reserves and private land, it omits to show major land-use features, roads and logging coupes. By failing to show major logging roads and logging coupes, as well as planned roads and coupes, it does not provide an adequate representation of ‘other use zones.’ The map provides no detail as to current or planned land use and actually give a false impression of the land use in areas adjacent to TWWHA



3.2 Impact

The State Party report claims that logging and roading activities occurring adjacent to the TWWHA will be managed to ensure a low impact. It is claimed that ‘non-clearfell’ logging will minimise damage to natural values and the potential for threats to the values and integrity of the TWWHA.

In actuality, logging and management practices have not been materially altered or improved to reflect wilderness values, the proximity of the TWWHA or to rule out damage to the values and integrity of the TWWHA. Typical, high impact logging activities continue to occur in areas adjacent to the TWWHA. These operations include clearfelling, road construction, high intensity and low intensity burning, shooting and trapping of wildlife, logging in the proximity of sensitive karst areas and extensive clearing in ‘non clearfell’ coupes. Management prescriptions set through Forest Practices Plans and the Forest Practices Code lead to only minor modifications in harvesting, with landscape-scale impacts continuing to occur.

Forest Practices Code prescriptions have failed to minimise impacts: ‘wash-down’ requirements aimed at checking the spread of weeds and diseases are routinely ignored, logging operations continue to occur in key threatened species habitat and within sensitive areas such as karst catchments. The habitat and biodiversity values of stream-side reserves and retained ‘clumps’ in coupes adjacent to the TWWHA are very unlikely to be retained following high intensity burning operations.

The use of ‘non-clearfell’ techniques has not ensured reduced impacts on natural values or reduced the risk of damage to the TWWHA. ‘Non clearfell’ techniques being employed in Tall Eucalypt, mixed forest and rainforest are defective. They continue to involve extensive clear-cutting of large areas of forest within logging coupes. Small, retained patches of forest within coupes are subject to increased external pressures and ‘the edge effect’. The habitat and biodiversity value of small retained areas is undermined. Furthermore, the continued use of ‘regeneration’ burning means that retained forest patches are often burnt and damaged, further undermining any ecological value. The use of non-clearfell techniques does not reduce the potential for logging activities to threaten the values or integrity of the TWWHA. The potential for fire escape, weed and disease incursion, loss of wilderness and visual quality is still high.

The use of ‘non-clearfell’ logging techniques has not resulted in any significant reduction in visual impacts. ‘Non clearfell’ logging still results in major alteration of significant natural landscapes along the fringes of the TWWHA. The TWWHA Management Plan 1999 states that ‘the wilderness quality of the [World Heritage] area can only be retained by ensuring that natural view-fields from major vantage points are maintained,’ (Parks and Wildlife Service, 1999. p202). Logging operations in the identified wilderness areas are damaging natural view-fields from key vantage points in and alongside the TWWHA.

The Tasmanian Government and Forestry Tasmania have reneged on a commitment made to end clearfelling in oldgrowth forests by 2010. This target has been reduced to an 80% use of ‘non-clearfell silviculture’ by 2010. Commitments regarding management of ‘Special Timber Management Union’ (STMU) have also been diluted. Prior to the TCFA, ‘clearfelling and burning’ were ‘specifically excluded from STMUs’. In 2004, STMUs were ‘to be managed through partial harvest or selective systems’. The TCFA now only commits to ‘management of selected areas of STMUs on State forest, for selective harvest of special species timber,’ (Timber Workers For Forests, 2005).

Consideration of the impacts of logging high-conservation-value forests adjacent to the boundary of the TWWHA must also include an assessment of the risks posed by expanding roading and human access around the fringes of the TWWHA. Many logging coupes adjacent to the TWWHA are in remote areas which require additional roading to provide access. An expanded network of roads in close proximity to remote and sensitive regions of the TWWHA will almost certainly entail



impacts on the TWWHA. Increased public access raises the risk of damage caused by recreational activities, poaching, and deliberate or accidental fires.

Logging and roading activities adjacent to the TWWHA are likely to pose impacts upon the TWWHA including:

- loss of wilderness quality due to industrial activities and expanded human access around remote wilderness protected within the TWWHA;
- loss of visual quality: view-fields are interrupted by alterations and damage caused by logging and roading;
- impact on rare and endangered species: logging and burning may impact on communities of threatened species inside the TWWHA, especially populations of highly mobile threatened species such as the Wedge-tailed Eagle, White Goshawk and Tasmanian Devil;
- fire escape: there is an ongoing risk of high intensity burns and unplanned fires escaping into the TWWHA;
- weed and disease incursion: industrial activity raises the risk of transmission of weeds and diseases such as the root rot fungus *Phytophthora cinnamomi* through the movement of harvesting machinery, recreational vehicles and human activity;
- risks from increased human access: damage caused by recreational activities, poaching, deliberate or accidental fires.

3.3 Intensity

The state party report claims that there has been no intensification of industrial activities adjacent to the TWWHA and that ‘intensive’ operations are not conducted in close proximity to remote areas and wilderness. These statements contradict the reality of forestry planning and ‘on the ground’ activities in the areas identified by NGOs.

The report states that: ‘There is no intensification of logging in areas adjacent to the TWWHA,’ and that ‘In most areas there is a history of logging over many decades.’

The State of the TWWHA report notes that, from the mid 1990s ‘logging has expanded into the South-eastern border region of the TWWHA,’ (Parks and Wildlife Service, 2004). Since the late 1980s, hundreds of kilometres of new logging roads have been pushed into areas of pristine forest, never before subject to logging in the lower Weld, Middle Huon, Picton, Tyenna, Great Western Tiers, Upper Mersey, Navarre, Derwent / Counsel River, Wylds Craig, Mt Wedge, Styx valley, slopes of the Snowy Range, Middle Huon and Lune River / Hastings / Esperance area.

Pristine forested valleys and mountain slopes which flow out of the TWWHA have been opened up to industrial activity for the first time in human history. New roads have opened access for logging in wilderness areas adjacent to the TWWHA. In all the areas outlined by NGOs, the rate of conversion of pristine forests has increased and, in some areas, logging has commenced, or is planned to commence, for the first time.

This combined activity amounts to a dangerous intensification of industrial activity in areas adjacent to the TWWHA. More coupes are being logged closer to the TWWHA boundary. Large scale clearfelling and logging has resulted in ever-decreasing natural corridors between logged coupes.

The associated claim that planned and current logging activities along the TWWHA boundary are not ‘intensive’ is also misleading. Large areas of oldgrowth forest in the upper Styx Valley have recently been felled and converted to plantation. Whilst plantation establishment is ruled out in some of these areas, other intensive land use practices—including clearfelling, extensive road



construction, high intensity and low intensity burning, shooting and trapping of wildlife, logging in the proximity of sensitive karst areas and extensive clearing in ‘non clearfell’ coupes—persist.

The vast majority of logging operations in forests along the TWWHA are conducted using destructive, mechanised techniques to supply large volumes of pulpwood.

3.3.1 Threats from fires and burns

High intensity burns and other fires originating from logging coupes and forest management activities pose a significant threat to sensitive and endangered flora and fauna communities, both within the TWWHA and adjacent areas. The escape of burns across reserve boundaries and the heat and scorching affects of burns contained within state forest can significantly affect sensitive vegetation and animal communities (Threatened Species Section, 2006). Sensitive and threatened flora and fauna within the TWWHA, including alpine and sub-alpine species, fern species and rainforest communities, are threatened by burning. Whilst the risk posed by actual fire escapes is most severe, scorching, hot winds and disruption caused by fires contained within coupes—leading to detrimental hydrological and micro-climate changes—is still problematic.

An example of the potential impact of escaped regeneration burns on sensitive alpine and sub-alpine flora is provided by the 1966 fire which escaped from a logging coupe in the Florentine Valley and roared up the face of Mt Field West, and destroyed large tracts of fire-sensitive alpine vegetation. This included Deciduous Beech and King Billy Pines. This was an ecological tragedy that will take many centuries of total fire exclusion to rectify.

The State Party report acknowledges that ‘there is a risk that fire may spread from State forest into the TWWHA,’ and that ‘fire is the major external threat that could affect substantial parts of the TWWHA,’ yet it claims that this major risk is neutralised by modifying coupe boundaries and by ‘the preparedness’ of crews to fight escaped fires. However the regular occurrence of planned burns escaping and damaging large areas of forest throughout the state demonstrates that boundary configuration and fire-fighting preparedness are inadequate and reactive tactics.

Since the 1989 extension of the TWWHA there have been numerous documented examples of deliberate or accidental fires started in logging coupes escaping and damaging adjacent forests, in addition to the Wedge Inlet fire which escaped into the TWWHA, burning some 157 hectares. Some of these fires have directly threatened or damaged the values and integrity of the TWWHA.

In 1988 and 1989, a spate of such escapes, particularly in the Southern Forests, led to inquiries and reports by experts and inter-departmental committees. Sometimes these escapes burnt wilderness nominated as part of the Tasmanian Wilderness World Heritage Area (1988 at Lune River, 1989 at Clear Hill and Lune River). Then in the mid-1990s, there were more outbreaks, both in 1995 and 1998. 1998 was a particularly bad year, with over 6000 hectares burnt by two major escapes in the Saddleback area of north-eastern Tasmania and the Styx valley of the south. Five thousand hectares of the Arthur-Pieman Protected Area were burnt by the Temma/Rebecca fire in 1995. The Mathinna Falls Forest Reserve was burnt by the Saddleback fire in March 1998.

The World Heritage Area came under immediate and dire threat of being burnt by a fire which started as a result of a logging operation in coupe PC72 in January 2003. The fire burnt in thick, tall forest in rugged terrain only 300 metres from the boundary of the TWWHA. For some weeks it threatened to burn inside the TWWHA, fanned by the prevailing westerlies. In March 2004, a high intensity regeneration burn in coupe WR015B, in the Lower Weld Valley, escaped and burned up steep slopes towards the TWWHA. 46 hectares of pristine forest bordering the TWWHA were severely burnt and some understorey continued to burn and smolder during the following week. This fire came within 200 metres of the TWWHA boundary (Senate Hansard, 2004). In 2005, high



intensity burns in coupes WRO14B, BBO22C and WRO15G in the Weld Valley also escaped, burning an unspecified area of forest.

Location and date of fire	Area burnt (ha)	Cause
Weld Valley (March 2004)	46	Escaped Regeneration burn—came to within 200 metres of WHA
Picton valley (Jan 2003)	100 (+)	Spark from logging machinery—came to within 300 metres of the WHA
Saddleback (Jan 2003)	610	Spark from logging machinery
Huon Area (March 1998)	270	Escaped prescribed burn
Hopetoun (March 1998)	11	Escaped prescribed burn
Upper Styx (March 1998)	?	Escaped regeneration burn
Styx (March 1998)	1500	Escaped regeneration burn
Saddleback (March 1998)	4741	Escaped regeneration burn
Rebecca (Tarkine) (March 1995)	5000	Spark from chain-saw
Gordon (Feb 1989)	2160	Escaped regeneration burn—entered area nominated for WH
Lune River (Feb 1989)	1061	Escaped regeneration burn—entered area nominated for WH
Clear Hill (Feb 1989)	2187	Escaped regeneration burn
Kermandie (Feb 1989)	148	Escaped regeneration burn
Esperance Coupe EP57/61	318	Escaped Regeneration burn
Hopetoun (Feb 1989)	173	Escaped regeneration burn

This is a summary of some major fire escapes originating from logging activities. The actual incidence of fire escape is much more extensive. A request for information regarding recent fires escapes from logging operations was presented to Forestry Tasmania to assist with this report ; however, the organisation refused to provide additional information.

The frequency and extent of fires originating from logging and forest management activities, especially in areas adjacent to the TWWHA is cause for concern. As logging operations proceed closer to the TWWHA boundary in some areas—in steep, remote country with thick vegetation—the threat associated with burns escaping prescribed boundaries is exacerbated.

As global warming leads to higher temperatures, dryer vegetation and more unpredictable weather, the risk of a fire sparking, escaping into natural forest or moving into and damaging sub-alpine and alpine vegetation is increased. Fire management in areas adjacent to the TWWHA must be adjusted to fit this reality

The claim that ‘even intense fire occurrences, within the range of natural occurrence, do not necessarily represent a threat to integrity,’ is alarming, especially given the recognition that fire represents a major threat to the integrity of the TWWHA. Intense fire occurrences precipitated by land use practices constitute a major threat to fire-sensitive ecological communities and the world heritage values they support.



4. Wilderness areas

NGOs have outlined a number of key wilderness areas adjacent to the TWWHA where logging and road construction, which is occurring or planned to occur, threatens the values and integrity of the TWWHA. Many of these areas have been previously identified by the Tasmanian Department of Parks, Wildlife and Heritage (1990), scientists (Kirkpatrick 1994, and Blake et al 1995) and the IUCN General Assembly in past resolutions.

These areas are essential components of the pristine temperate wilderness ecosystem partly protected within the TWWHA. They are an intrinsic part of the Western Tasmanian wilderness. They demonstrate potential World Heritage values in terms of karst, glaciation, tall eucalypt, Huon Pine and other botanical features, threatened flora and fauna, scenic and Aboriginal heritage (as identified by Hitchcock and the Department of Parks, Wildlife and Heritage in 1990).

These areas have been identified as valuable additions to the TWWHA which, if included, would further provide for the integrity and improved management of the TWWHA.

The State Party report seeks to present the view that these are 'peripheral' and 'minor' areas, whose management bears no relevance to the management of the adjacent TWWHA. The report claims that logging, roading and burning activities conducted in wilderness forests with potential World Heritage values adjacent to the TWWHA is an acceptable use of these areas that is compatible with the management of the adjacent World Heritage property.

The report states that 'unreserved wilderness is managed as production forestry and some of this now has reduced wilderness values due to road construction and logging since 1996.' This is an effective admission of the impacts of logging and roading activities upon the TWWHA. For these operations have not only affected wilderness values along the fringes of the current TWWHA, they have downgraded the wilderness quality and affected the integrity of remote and fragile areas within the TWWHA. The TWWHA relies on the remoteness and naturalness of its natural and cultural assets to maintain its integrity. In many areas, the boundary of the WHA does not protect wilderness even within the WHA. Hence, existing wilderness areas constitute a natural buffer which must be retained in order to safeguard the integrity of natural and cultural assets. Industrial activity and expanded access along the fringes of the property is decimating this natural buffer.

The state party report also claims that 'most of the roading adjacent to the TWWHA is already in place and any additional impacts on wilderness will be minimal.' A cursory examination of logging plans demonstrates that this statement is inaccurate. Significant new roading is planned for wilderness areas adjacent to the TWWHA, including the Lower Weld, Upper Florentine, Butlers and Styx. These roads will be used to provide access for logging operations closer to the TWWHA boundary. Again, ongoing and expanded 'impacts on wilderness' represent an inevitable downgrading of the values and integrity of the TWWHA.

Each year, industrial activity is exposing more of the TWWHA boundary to potential threats and reducing natural buffers. Whilst the state party report claims that 'logging has occurred in areas around the periphery of the TWWHA' for over fifty years, most of the remote wilderness areas that have provided natural buffers around the TWWHA periphery have never been subject to any logging.

The management of these wilderness areas for large scale, extractive production of logs is clearly not sympathetic to the management requirements of the TWWHA. Yet, the state party report makes the spurious claim that current practices in adjacent State forest land represent 'the most benign form of productive land use available for land adjoining the TWWHA.' The destruction of large areas of ancient forest housing threatened species and the associated infiltration of pristine ecosystems with roads, weeds and escaped fires is not a 'benign' form of land use. It must be



noted that sensitive eco-tourism provides a demonstrated, low impact and high return, alternative to destructive logging operations.

5. Conclusion

The claims and statements presented in the State Party report are symptomatic of a short-sighted, negligent approach to natural area management, which prioritises the requirements of the logging industry over national and global responsibilities to protect and enhance an outstanding temperate wilderness area, unique in the world. By systematically downplaying and sidelining the issue of threats to the TWWHA, Federal and State Governments have demonstrated a blatant disregard for the status of this World Heritage property, and the associated wilderness areas which are essential to ensuring its long-term future.

6. Recommendations

The Wilderness Society and Huon Valley Environment Centre call for:

- The Australian Government to expand the Tasmanian Wilderness World Heritage Area to protect adjacent forests with World Heritage values by incorporating them into the TWWHA;
- A formal delegation from the World Heritage Centre to inspect the valleys adjacent to the TWWHA and the current and proposed logging operations within those valleys to assess the impacts on World Heritage values and the integrity of the TWWHA.

Relevant correspondence with international World Heritage authorities regarding the threats to the Tasmanian Wilderness World Heritage Area from logging are attached.



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