



Threats from logging to the outstanding universal values of the Tasmanian Wilderness

A report to the IUCN by Senator Bob Brown

by Geoff Law
March 2010

Logging roads and forestry operations in the oldgrowth eucalypt and rainforests of the Styx valley immediately adjacent to the Tasmanian Wilderness World Heritage Area (background).
Photo by Rob Blakers, September 2008.

Executive Summary

More than 80 logging coupes (a coupe is a defined area within which logging occurs generally averaging about 50 ha) totalling up to 4000 ha in area have been scheduled within five km of the Tasmanian Wilderness World Heritage Area (TWWHA) within the current three-year logging plan of Forestry Tasmania (July 2009 - June 2012).

Over 70 logging coupes (including many of the above) totalling up to 3500 ha have been scheduled within areas that have been documented as having outstanding universal values. These are adjacent to the TWWHA and have been subject to calls by the IUCN and World Heritage Committee for possible extension of the TWWHA over the past 20 years.

These include:

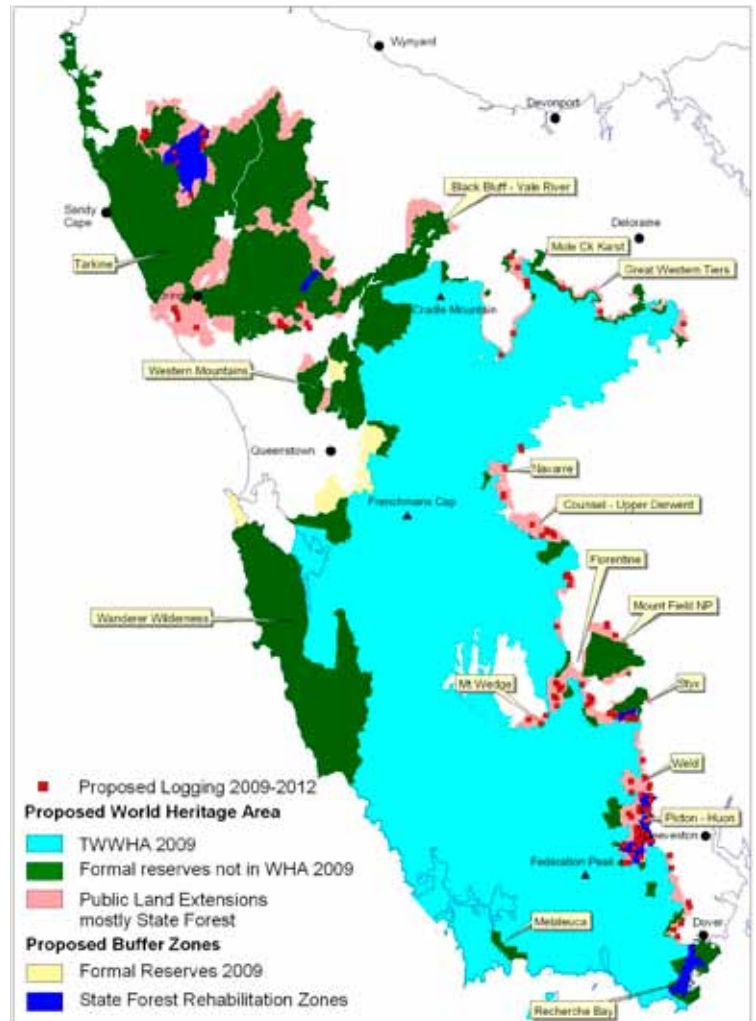
- Seven coupes within proposed extensions to the TWWHA within the upper Florentine valley;
- At least four in proposed extensions to the TWWHA in the Weld valley;
- At least six in proposed extensions to the TWWHA in the Styx valley;
- At least fifteen in proposed extensions to the TWWHA in the Tarkine rainforest wilderness;
- At least nine in proposed extensions to the TWWHA in the Upper Mersey valley and Great Western Tiers;
- Nine in the Upper Derwent Counsel River areas.

(A new logging operation near Farmhouse Creek in the Picton valley, adjacent to the TWWHA, commenced in March 2010.)

The new logging roads associated with these coupes bring severe impacts of their own, including loss of remoteness and wilderness condition; the introduction of feral animals, weeds, and diseases such as the Devil Facial Tumour Disease; genetic contamination from non-native plantation species; vandalism to cultural heritage such as caves, artefacts and structures; and access for arsonists.

These logging coupes will therefore damage or threaten World Heritage values (outstanding universal values) such as:

- Tall-eucalypt forests (only 20% of the original extent in Tasmania is in any way protected);
- Giant trees. (In 2003, the most massive known tree in Australia, El Grande, was incinerated by a forestry burn-off conducted by Forestry Tasmania);
- Gondwanic forests such as rainforests, including Australia's greatest cool-temperate rainforest (the Tarkine);
- Magnificent vistas of untouched forests (part of the outstanding universal value of the TWWHA);
- Sensitive alpine vegetation of outstanding universal value (due to increased threat from fire due to forestry burn-offs escaping and unregulated access for wild-fire arsonists. A recent deliberately-lit fire in the Tarkine burnt out more than 10,000 ha of moorlands and rainforests);
- Karst, including the catchments of intricate cave-bearing terrain and species;
- Aboriginal heritage in valleys such as the Upper Florentine, Huon and Tarkine; and
- Rare, threatened or vulnerable species such as the Tasmanian devil, spotted-tailed quoll (also a carnivorous marsupial) and Tasmanian wedge-tailed eagle (the largest bird of prey in Australia). (Just in the last month, spotted-tail quolls and Tasmanian devils have been filmed in a proposed logging coupe in the upper Florentine)



Scheduled logging areas 2009-2012 in public land of documented World Heritage Value adjacent to the TWWHA and in the Tarkine. Map by Matt Dell.

The proposed logging will therefore damage the integrity of the TWWHA if it proceeds.

The Australian Government's responses to the World Heritage Committee's concerns about these issues contained in the Government's State Party Report 2010 to the World Heritage Committee are inadequate because:

- Stakeholder consultation about forestry operations in proximity to the TWWHA – particularly with environmental and Aboriginal NGOs – has been virtually non-existent;
- Less than 3% of the areas with documented World Heritage values in Western Tasmania (806,000 ha outside of the TWWHA) have been proposed by the Australian Government as extensions to the TWWHA (23,873 ha);
- Resourcing for protecting Aboriginal heritage through partnerships with groups such as the Tasmanian Aboriginal Land and Sea Council has been woefully inadequate;
- Sites of irreplaceable Aboriginal heritage (including caves containing stencils, artefacts and deposits up to 35,000 years old) are now being threatened by encroaching forestry operations and increased unregulated access;
- The impacts of new logging roads on World Heritage values are not considered by government. The roads proceed irrespective of impacts on wilderness and other outstanding universal values. The governmental Forest Practices Code is inadequate for protecting such values;
- Fire-sensitive vegetation is being threatened by new logging roads, badly sited logging operations and inadequate boundaries of the TWWHA;
- Many of the provisions of the Regional Forest Agreement (RFA) that relate to biodiversity have not been implemented. The exemptions to national environment laws for logging operations mean that Australia is powerless to prevent rare and threatened species such as the Tasmanian wedge-tailed eagle and the swift parrot from being pushed towards extinction by forestry operations;
- The TWWHA remains vulnerable to climate-change wild-fires because sensitive ecosystems have not been sufficiently replicated within the TWWHA. Outside of the TWWHA, important Aboriginal coastal cultural heritage is in great jeopardy due to rising sea-levels and the failure of the Australian Government to protect the coastline from erosion by off-road vehicles;
- The Australian Government has failed to comply with a request from the World Heritage Committee to extend the TWWHA (further than the above tiny increment) to include tall-eucalypt forests and cultural heritage. This decision ignores the outstanding universal values contained within the tallest and most massive hardwood trees in the world; the greatest and most diverse tracts of temperate rainforest in Australia; some of Australia's deepest and most spectacular caves; some of Australia's most glaciated terrain; and many sites of irreplaceable Aboriginal cultural heritage, including large shell middens on the Tarkine coast and caves in the South-West containing hand-stencils; and many other values.



Aggregated retention is Forestry Tasmania's attempt to log oldgrowth forests sensitively. This example, in the Styx valley within 2km of the TWWHA, shows that retained clumps of forest were incinerated by Forestry Tasmania's burn-off. Photo by Rob Blakers

To address the above shortcomings, the Australian and Tasmanian governments should:

- Extend the TWWHA to incorporate the 806,000 ha of proposed extensions identified in numerous government and conservation NGO reports, including the Weld, Styx and Florentine oldgrowth forests, the Tarkine rainforests, the Great Western Tiers, and the wilderness areas of the far west (such as the Wanderer catchment);
- In the interim, halt all logging and road-building operations in the above areas and ensure that no logging, forestry burns or other forestry operations are carried out in close proximity to the TWWHA unless it is agreed by conservation NGO stakeholders that such operations are necessary to manage fire risks to the TWWHA;
- Upgrade the reserve status of an extended TWWHA to national-park equivalent in consultation with the Tasmanian Aboriginal community;
- Ensure the long-term safety and viability of Gondwanic vegetation, other rainforests and alpine vegetation by protecting as many such sites within the TWWHA as possible in order to bolster protection of this outstanding value from wild fire;

- Ensure no new logging roads are built in close proximity to the TWWHA due to dangers from arsonists and other vandals;
- Ensure the outstanding Aboriginal cultural values of sites within the TWWHA such as Bone Cave, Wurragarra Shelter, Wargata Mina and the Lemonthyme forest be explicitly acknowledged in the Australian Government's statement of outstanding universal values for the Tasmanian wilderness;
- Carry out genuine and respectful consultation, engagement, resourcing and negotiation with Tasmanian Aboriginal people regarding management of cultural heritage and the scheduling of destructive forestry operations. (There are numerous examples of important Aboriginal cultural heritage being found only after logging or road-building have commenced.)



A giant *Eucalyptus regnans* (the tallest hardwood species in the world growing up to 100m) stands in the midst of logging debris in the Styx valley (coupe SX09B, October 2009, within two km of the TWWHA). Photo by Nick Fitzgerald.

Background

The TWWHA is one of the world's great temperate wilderness areas. It is a land of craggy mountains, giant trees, ancient rainforests, intricate caves and dark swirling rivers. Its landscapes have been fashioned by glaciers, wild rivers, the Roaring Forties winds and the pounding waves of the Southern Ocean. Its heathlands, forests, streams, lagoons and grasslands are home to many unique or rare and threatened species, including the world's largest carnivorous marsupials, one of the world's biggest raptors, and 'living fossils' such as the mountain shrimp *Anaspides*. The area's caves and beaches retain the remains of a 35,000-year-old culture which endured changes in climate from Ice Age to temperate times, and one of the greatest periods of isolation known in human history.

Listed in 1982 and extended in 1989, the TWWHA satisfies at least two of UNESCO's six cultural criteria for World Heritage and all four natural criteria.

Yet crucial parts of the Tasmanian wilderness have been left out of the TWWHA due to pressure from logging and mining interests. This has led to decades of debate about the appropriate boundaries of the TWWHA. Meanwhile, wilderness, magnificent scenery, tall-eucalypt forests, giant trees, rainforests and Aboriginal heritage along the eastern fringe of the TWWHA have been jeopardised or destroyed by logging. Even today, new logging roads are being pushed into pristine wilderness at public expense. Four-wheel-drive tracks created by companies attempting to mine wilderness to the west of the TWWHA are creating undesirable access for destructive off-road vehicles. And petroglyphs and giant shell middens on the Tarkine coast are being and have been deliberately destroyed by vandals.

Discussion about the inadequate boundaries of the TWWHA has occurred in several sessions of the World Heritage Committee, including in 2006, 2007 and 2008. A reactive mission visited the TWWHA in March 2008. And the World Heritage Committee has requested the Australian Government to commit to certain undertakings that would improve the management of the TWWHA.

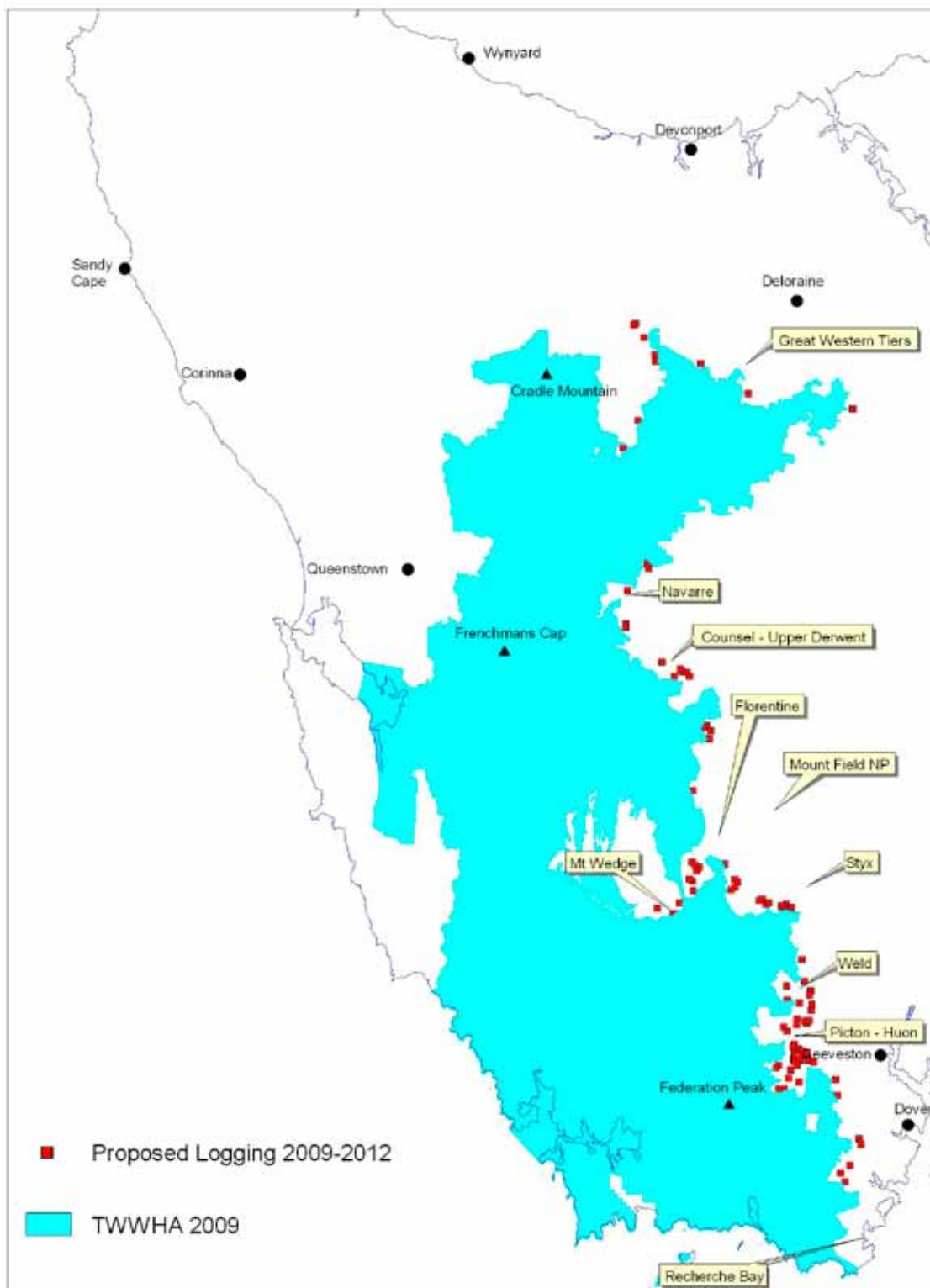
On 17 March 2010, Senator Bob Brown (Leader of the Australian Greens and former a Director of the Tasmanian Wilderness Society) received a request from the IUCN for recent information on the **commercial logging threat in areas adjacent to the World Heritage property**.¹ The letter appended the 2008 decision of the World Heritage Committee (32COM 7B.41²) as background. The deadline for provision of this information was 30 March 2010.

This report comprises the response of Senator Brown to that request. It describes the logging operations in areas adjacent to the TWWHA; it assesses the Australian Government's response to the World Heritage Committee's requests of 2008; it describes the impacts of logging and proposed logging on Western Tasmania's outstanding universal values; and it makes recommendations.

This report draws upon an established body of knowledge about recent and proposed logging operations in areas adjacent to the TWWHA, and about the impacts of these logging operations.

Styx valley. Photo by Rob Blakers





Map 1.
Scheduled logging areas
2009-2012 in public land
within 5 km of the TWWHA.
Map by Matt Dell.

1. Logging in areas adjacent to the TWWHA

Map 1 shows more than 80 proposed logging coupes in close proximity to the TWWHA that have been scheduled on public land for June 2009 to July 2012.³ At approximately 50 ha in average size, this is up to 4000 ha of forest to be logged in proximity to the TWWHA, often in areas that have outstanding universal value in their own right.

Particularly disturbing is the high number of coupes along the highly contentious eastern boundary of the TWWHA. Many have been scheduled in iconic forests such as those of the Styx, Florentine and Weld. But equally disturbing are the large numbers to be carried out in lesser known but equally significant areas such as the Counsel River, upper Derwent and Mt Wedge.

The impacts of this large-scale assault by commercial logging on outstanding universal values will be discussed in section 3.

2. The Australian Government's response to the World Heritage Committee decision of July 2008^(32COM 7B.41)

The Australian Government's response to the World Heritage Committee's concerns about logging in close proximity to the TWWHA is contained in the document entitled *State party report on the state of conservation of the Tasmanian Wilderness World Heritage Area (Australia), property ID 181bis, in response to World Heritage Committee Decision WHC COM 7B.41, for submission by 1 February 2010*,⁴ henceforth referred to as The State Party Report 2010. Taking the decision components in turn:

2.1 Paragraph 3a of the Committee's Decision – stakeholder engagement

Institute a mechanism through the future Tasmanian Wilderness World Heritage Area (TWWHA) management plan reviews, and involving all relevant stakeholders, to monitor, assess and manage for ecological integrity the TWWHA and adjoining reserves by considering activities related to forestry operations, road construction and regeneration fires in the areas adjacent to the property

The State Party Report 2010 says only that the Tasmanian and Australian governments are considering a range of options to implement this request. The wording is long-winded, convoluted and obfuscating. No timeline is given for meeting the World Heritage Committee's request. Meanwhile, no stakeholder engagement has occurred with on-the-ground environment groups such as the Wilderness Society, Environment Tasmania, Tasmanian Conservation Trust, Huon Valley Environment Centre or Still Wild Still Threatened, or with the Tasmanian Aboriginal Land and Sea Council (TALSC).⁵



Despite the absence of stakeholder engagement, logging, road construction, regeneration fires and other destructive forestry operations have occurred or been scheduled in areas with outstanding universal values adjacent to the TWWHA. This photo depicts logging in the iconic Styx valley in 2009. Photo by Rob Blakers.

Destructive logging, however, has continued to occur at a high rate or is scheduled in areas with outstanding universal values adjacent to the TWWHA. The Australian Government has therefore failed to comply with either the letter or the spirit of paragraph 3a of the World Heritage Committee's decision.

2.2 Paragraph 3b of the Committee's Decision – 21 areas of reserve as extension to TWWHA

Submit a proposal for modifying the boundaries of the TWWHA to include the adjacent 21 areas of national parks and state reserves, which are currently not a part of the inscribed World Heritage property but are covered by its management plan

A decision to provide a proposal that purports to extend the TWWHA to incorporate the 21 areas is stated in the State Party Report 2010⁶ but there has been no public announcement. There is also a disparity in the area of the 21 areas of Formal Reserve between the State Party Report 2010 (20,063 ha) and earlier reports, such as the State Party Report 2007 (20,114 ha).⁷ There is no explanation for this disparity of 51 ha. The proposed extension also contains the part of the Southwest Conservation Area at Melaleuca and Cox Bight, bringing the area of the extension to 23,873 ha, or 1.8% of the existing TWWHA.

This extension also represents less than 3% of the total extension required to protect all outstanding universal values in Western Tasmania as identified in numerous reports from 1990 to 2009, most recently in Law 2009.⁸ Most of the areas within the extension have been Formal Dedicated Reserves since 1998. The extension therefore fails to adequately address the concerns raised at World Heritage Committee meetings in 2006, 2007 and 2008 arising from the threat to outstanding universal values from logging. It only marginally addresses issues raised by IUCN in its technical evaluation of the proposed World Heritage extension in 1989.⁹

2.3 Paragraph 3c of the Committee's decision

Not to renew the existing leases for mineral exploration and exploitation within the property and immediately adjacent to it (such as in the Melaleuca Cox Bight area), after their expiry and to rehabilitate the areas concerned and to incorporate them into the World Heritage property. Further no new mining licences should be granted within the property or in the areas which are being recommended for addition

The State Party Report 2010 contains this very welcome statement: *Australia agrees that mining is not appropriate in the World Heritage property.* The Australian Government is urged to apply this policy to all other World Heritage Areas in Australia, including Kakadu, where there are enclaves within the WHA to allow mining at Jabiluka and Koongarra. The Australian Government's intentions and plans regarding Melaleuca and Adamsfield are welcome. They should be put into effect expeditiously.

Mineral exploration elsewhere in Western Tasmania is adversely affecting outstanding universal values, particularly south of Macquarie Harbour (outside and to the west of the TWWHA). Here, old mineral-exploration tracks are being taken over by off-road-vehicle users, reducing the remoteness, tranquillity and integrity of this wilderness.

2.4 Paragraphs 3d and 3e of the Committee's decision – Aboriginal cultural heritage



Hand stencils in Ballawinne Cave within the TWWHA. Similar stencils have been found within caves adjacent to the TWWHA amongst forests threatened by logging. Photo by Grant Dixon.

3d. Maintain and improve the resourcing for the research, documentation, protection, monitoring and effective management for archaeological and Aboriginal cultural sites both those within the TWWHA and those in the adjacent forestry areas that reflect the wider context of Aboriginal land-use practices and are of potential outstanding universal value

3e. Manage the forestry areas outside the inscribed property in order to protect cultural sites of potential outstanding universal value;

The State Party Report 2010 claims to have improved and maintained resourcing for Aboriginal heritage in Tasmania by providing extra funds, such as \$387,500 for an Aboriginal project inside the TWWHA.

However, Aboriginal stakeholders such as the TALSC do not regard this response by the Australian Government as being a fair or accurate

representation of government support for Aboriginal heritage associated with the TWWHA. According to TALSC, the Aboriginal community has not been engaged in serious consultation regarding Aboriginal heritage values in the TWWHA for over 3 years and has not been sufficiently funded to allow for management of the areas handed back to the community. Nor were Aboriginal representatives aware of the purpose of the \$387,500 grant for Aboriginal heritage within the TWWHA. They believe government support and consultation have been totally inadequate and say they have not been consulted by Forestry Tasmania regarding proposed logging operations adjacent to the TWWHA.¹⁰

(According to a Parks and Wildlife Service newsletter of December 2009, the grant is for an Aboriginal partnership project to record, protect and interpret Aboriginal heritage on the South Coast Track and Melaleuca. ¹¹ Clearly there has been a failure to communicate this adequately with some crucial stakeholders or to involve those stakeholders in its conceptualisation.) TALSC does not regard the Australian and Tasmanian governments' support of indigenous heritage associated with the TWWHA as sufficient and believes the governments should be doing the following:

*The government should not only be consulting with the Aboriginal community about ANY WHA matters as the area is rich in cultural heritage. We are seeing patterns of impacts on our sites (including burial sites) through government-funded activities where there has been no requirement to consult with us prior to funding being given to these groups for activities, and we are left to pick up the pieces and rehabilitate our sacred sites (WITH NO FUNDING!) because the government-funded groups are being given the all clear without our knowing. The government MUST fund us to undertake rehabilitation of our sacred heritage when these groups STUFF UP; the government MUST fund community activities for further monitoring and protection of our cave sites, our community MUST be given support for site access so they can experience these caves. More white people have had the honour of experiencing these caves than Aboriginal people, and that s just plain wrong.*¹⁰

Another member of the Aboriginal community said that support for Aboriginal people to properly participate in the protection of their heritage is not there and that the governments must **engage with the Aboriginal community, and build the capacity of the Aboriginal community to be able to meet and advise government on management matters and works.** ¹⁰ TALSC and another member of the Aboriginal community both said there had been no consultation from Government or Forestry Tasmania about proposed logging in areas adjacent to the TWWHA, despite the presence of highly important Aboriginal heritage in areas such as Riveaux and the upper Florentine.

Meanwhile, Forestry Tasmania has driven new roads and logging into previously pristine areas with documented World Heritage values adjacent to the TWWHA such as the Upper Florentine^{12 13}, a valley which contains several sites of great significance for Aboriginal cultural heritage, such as Nanwoon Cave¹⁴, and sites discovered more recently during geoheritage surveys.¹⁵

No progress has been made by Forestry Tasmania or the Australian Government in providing appropriate and permanent protection for the karst and Aboriginal heritage (including hand stencils) in another southern Tasmanian valley adjacent to the TWWHA, despite documentation of the area s values.¹⁶

Vandalism of Aboriginal cultural heritage with outstanding universal values occurred on the Tarkine coast in January 2006. No perpetrators were brought to justice.^{17 18}

The forcing of new logging roads (in the face of community protest) towards sites of extreme significance is irresponsible because it brings the same threat of vandalism to such sites. The Tasmanian Government has shown that it is either indifferent to or powerless to stop such vindictive destruction.



This cave was discovered in 2003 in the upper Florentine valley. Logging has been scheduled within 300 m of this cave. Aboriginal artifacts and other cultural heritage have been found in association with this cave system. Photo courtesy Nathan Duhig.

2.5 Paragraph 3f of the Committee's decision – logging roads

Ensure logging roads in areas adjacent to the TWWHA consider the ecological integrity, possible cultural sites and aesthetic values of the property, and reclaim roads no longer required

The State Party report 2010 fails to adequately address this request. It relies largely on references to the Forest Practices Code to claim that ecological integrity, aesthetic values and cultural sites are taken into account. It refers to a recent review of the biodiversity provisions of the code as evidence of the governments concern. However, according to a recent review of Tasmania s forestry governance, that review has made the following points:

- There are no clear guidelines for achieving the off-road component of ecologically sustainable management (of Tasmania s forests) ;
- Tasmania s primary biodiversity legislation does not contain clear, overarching objectives for the management of biodiversity in the state;
- The forest-practices system has no transparent dispute resolution mechanism to deal with situations where specialist advice (on biodiversity) is in conflict with other objectives’;
- Monitoring of the Forest Practices Code mostly determines levels of compliance with process, rather than the effectiveness of biodiversity measures put in place ;
- The head of the Forest Practices Authority (FPA) has said that the authority has to develop systems for regulating the application of policies that don t exist .¹⁹

Together, these constitute a damning criticism of the forest-practices system.

World Heritage experts and environmental groups have condemned Forestry Tasmania s construction of new logging roads into wilderness areas adjacent to the TWWHA. Impacts identified include scarring of wild and scenic vistas; the introduction of weeds, feral animals and genetic contamination; and exacerbation of the threat to adjacent alpine vegetation and rainforests from forestry-related burns and arson. These threats are detailed and documented in more detail in section 3. ^{24 30}



The State Party Report 2010 gives a rather extraordinary and damaging example of the closure and rehabilitation of roads adjacent to the TWWHA. The mineral-exploration track on the southern side of the Weld valley is in a forest within which new logging operations are scheduled, despite the area s documented World Heritage values.

It is revealing that the report gives no examples of logging roads having been voluntarily closed and rehabilitated by Forestry Tasmania, possibly because there are no such examples. (The Picton Road south of Farmhouse Creek, mentioned in the State Party Report 2010, was closed only after World Heritage Listing had occurred and after change of tenure from forestry land had been decided.)

A logging road into coupe SX09B carves its way through previously pristine tall eucalypts and rainforest in the Styx valley within two km of the TWWHA. Photo Vica Bayley, Feb 2010.

2.6 Paragraph 3g of the Committee's decision – vegetation plan

Prepare and implement a vegetation management plan covering the TWWHA and the adjoining forest reserves jointly by national parks and the forestry authorities, to address representativeness of vegetation types and to reduce risks, particularly from fires and climate change

Vegetation types requiring increased representation within the TWWHA include:

- Tall eucalypts (with only 20% of Tasmania's original extent of tall eucalypts in any form of reservation);
- Alpine vegetation and rainforests (to replicate fire-sensitive communities);
- Grasslands (poorly represented in any form of reserve in south-eastern Australia). The Vale of Belvoir north-west of Cradle Mountain has documented World Heritage values and, according to Professor Jamie Kirkpatrick, is one of Australia's most crucial tracts of grassland.²⁰

Reducing the severity and frequency of wild fires in fire-sensitive vegetation such as rainforests and alpine species should be a major objective of a statewide vegetation plan. This necessitates:

- Protecting fire-suppressant vegetation such as rainforests from logging and clearing;
- Managing inflammable vegetation such as buttongrass with the aim of protecting adjacent stands of oldgrowth forest, rainforest and alpine vegetation;
- Replicating fire-sensitive vegetation within large reserves such as the TWWHA.



A typical Forestry Tasmania burn-off pollutes the atmosphere with greenhouse gases and particulates in the Weld valley, within 1 km of the TWWHA. Similar burns have escaped and burnt adjacent vegetation. Photo by Rob Blakers, April 2008.

2.7 Paragraph 3h of the Committee's decision – Regional Forest Agreement review recommendations

Implement the recommendations emanating from the recently completed 2008 review of the Tasmanian Regional Forest Agreement

The governments' statements in the State Party Report 2010 do nothing to contradict a lack of confidence in the Regional Forest Agreement (RFA) by conservation groups. The lack of confidence stems from the bias of the agreement towards extractive logging; failure to implement certain provisions of the RFA pertaining to biodiversity conservation, such as the requirement to implement recovery plans for threatened species and management plans for many conservation reserves; and the notorious Wielangta case, in which failure of the RFA to protect threatened species from logging was deemed lawful because the RFA exempts logging in Tasmania from national environmental laws. A recent independent review of Australia's national environment statute reported significant community concern that environmental outcomes from RFAs are not being delivered. It recommended the Act be amended to make the exemptions conditional on better, more independent systems of performance assessment to ensure that the terms of the RFA are being followed and the desired outcomes being achieved. However, the Australian Government rejected this recommendation.²¹

Failure to change the RFA legislation means that Australia's environment laws will continue to fail to protect forests, including biodiversity and World Heritage values outside of listed World Heritage Areas.

2.8 Paragraph 3i of the Committee's decision – impacts of climate change

Establish an active program for monitoring the impacts of climate change on the property and to incorporate this program into a risk-reduction strategy and action plan

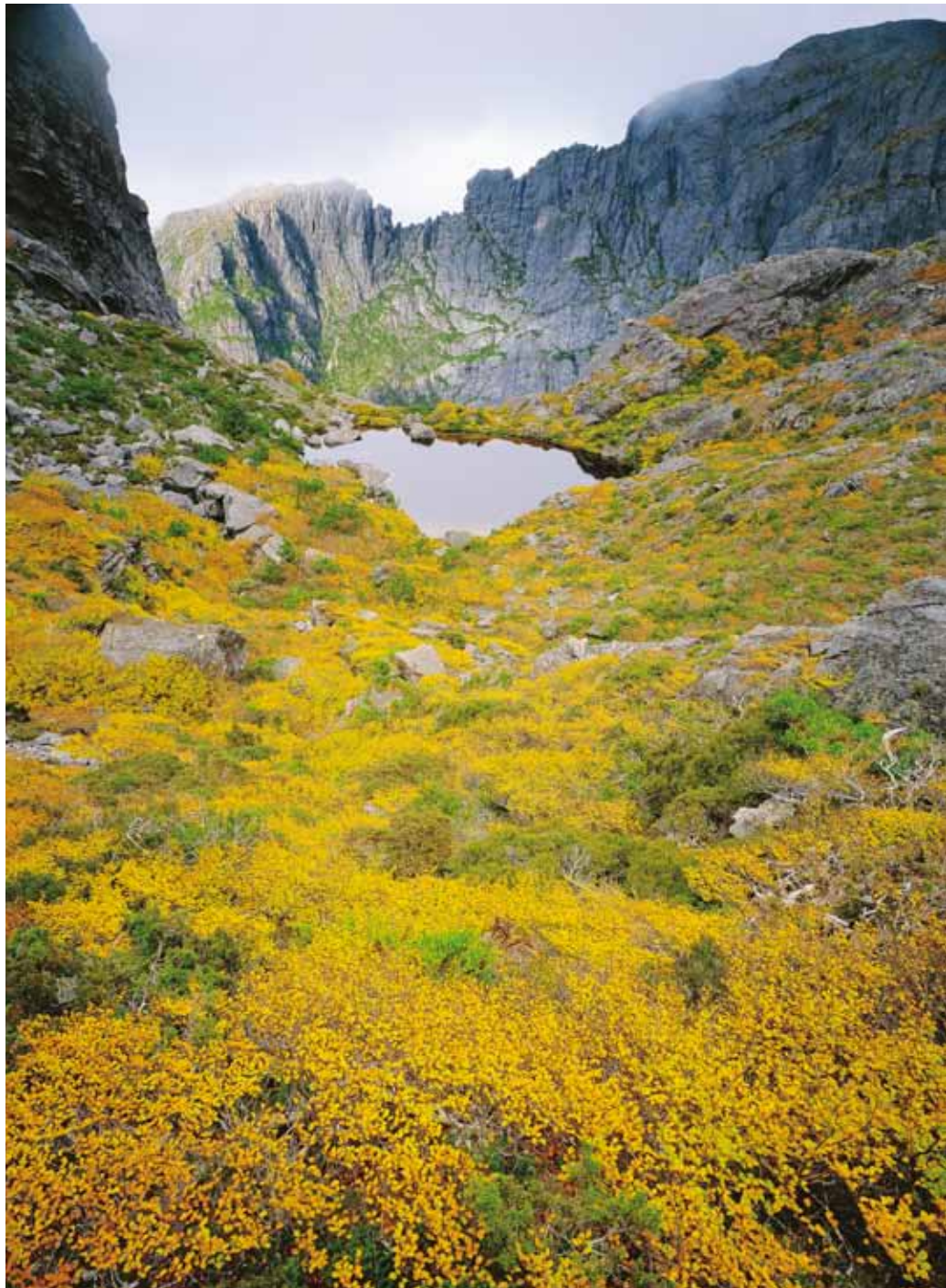
The State Party Report 2010 referred to the Australian Government's 2009 report warning of the impacts of climate change on Australia's World Heritage properties.²² The report warned of dangers to the TWWHA in the form of:

- Increased frequency and severity of bushfires threatening vulnerable fire-sensitive vegetation such as rainforests, alpine species and oldgrowth forests;
- Impacts of sea-level rise on the natural and cultural heritage of the TWWHA coast.

It is necessary to increase the replication of vulnerable vegetation within TWWHA as proposed in numerous reports such as the Tasmanian Government's Floristic Values Report 2004²³, the report by World Heritage expert Peter Hitchcock (2008)²⁴, many others since 1990, and encapsulated in Law 2009.²⁵

This requires adding areas such as the Tyndall Range, Mt Murchison, Mt Field National Park, Granite Tor, and Southwest Conservation Areas to the TWWHA.

To bolster protection of sensitive alpine species from bushfire, additional areas, such as Mt Murchison, should be protected as World Heritage. Photo by Rob Blakers.



2.9 Paragraph 4 of the Committee's decision – revise Statement of Outstanding Universal Value

Also requests the State Party to revise the Statement of Outstanding Universal Value for the property to include relevant recent natural and cultural knowledge available regarding the site, for approval by the World Heritage Committee

The State Party Report 2010 contains a new statement of outstanding universal value (Appendix 3). The new statement of outstanding universal values is welcomed. In particular, it is pleasing to see that the TWWHA is regarded as satisfying criterion (vi) 'be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance (in conjunction with other criteria)'. This gives due acknowledgment to the artistic and other cultural achievements of the Tasmanian Aboriginal people.²⁶

However, the statement should explicitly state that outstanding universal values occur in sites such as Bone Cave (Weld valley), Wargata Mina cave (Cracraft valley), Wurragarra Shelter (Mersey valley) and in the Lemonthyme forest. The significance of these sites and their landscapes was omitted from the 1988-89 renomination of the TWWHA, partly because some of them had only recently been discovered. Current literature about the outstanding universal values of the TWWHA therefore tends to emphasise the values of the Franklin - Gordon caves to the exclusion of other equally important sites. This should be rectified.

The statement on the integrity of the TWWHA fails to address issues raised in a number of reports, including the Floristic Values Report (2004), the Sharples Geoheritage Report (2003)²⁷, and Hitchcock (2008), which recommend extension of the TWWHA to include additional highly significant and sensitive areas.



An extended TWWHA should include the Navarre Plains with its threatened highland forests and glacial landscape. Photo by Rob Blakers.

2.10 Paragraph 5 of the Committee's decision – consideration of TWWHA extension to include tall eucalypts and cultural heritage

Reiterates its request to the State Party to consider, at its own discretion, extension of the property to include appropriate areas of tall eucalyptus forest, having regard to the advice of IUCN; and also further requests the State Party to consider, at its own discretion, extension of the property to include appropriate cultural sites reflecting the wider context of Aboriginal land-use practices

The State Party Report 2010 says that, other than the small proposed extension referred to in paragraph 3b, the Australian Government does not propose to extend the TWWHA further.

This decision flies in the face of evidence about:

- Documented outstanding universal values outside the TWWHA as encapsulated by the Department of Parks Wildlife and Heritage (1990), the Floristic Values Report (2004), the Sharples Geoheritage Report (2003), Hitchcock (2008) and encapsulated in Law (2009);
- Impacts of logging on outstanding universal values, as described in section 3;
- Numerous calls by the IUCN and World Heritage Committee since 1989²⁸.
- Evidence about the outstanding universal values contained within the tallest and most massive hardwood trees in the world; the greatest and most diverse tracts of temperate rainforest in Australia; some of Australia's deepest and most spectacular

caves; some of Australia's most glaciated terrain; and many sites of irreplaceable Aboriginal cultural heritage, including large shell middens on the Tarkine coast and caves in the South-West containing hand-stencils.

The State Party report justifies its position largely by reference to the report of the World Heritage Committee's mission to Tasmania of March 2008.²⁹ However, the Mission's report contains numerous mistakes as described by the Wilderness Society in August 2008³⁰. Those errors include:

- Counting *Eucalyptus nitida* as a tall-eucalypt tree for World Heritage purposes when its maximum height is approximately 40 metres, rather than the 60–90 metres referred to in the 1988–89 renomination of the TWWHA. This artificially bloats the statistics for protection of tall eucalypts, as, being a species not highly desired for logging, *E. nitida* is highly protected from logging;
- Making numerous numerical and definitional mistakes in tabulating figures about tall-eucalypt forests;
- Relying on wrong or misleading information relating to frequency of escapes from forestry burns and the impacts of the escaped fires, and drawing false conclusions from that information;
- Failure to take a holistic approach to World Heritage – for example, by focusing on statistics regarding reservation of tall eucalypts, rather than focusing on outstanding universal values;
- Failure to appreciate the outstanding universal value of Aboriginal heritage sites just outside the TWWHA which are almost identical in significance to those within it.

The impact of the Australian Government's decision is to allow logging to proceed in areas such as the Upper Florentine, lower Florentine, Weld, middle Huon, Styx, Counsel, upper Derwent, Tarkine and Great Western Tiers areas – places that contain the world's tallest and most massive hardwood trees, pristine tall-eucalypt forests, great tracts of pristine temperate rainforest, Aboriginal heritage up to 35,000 years old that includes stencils, artifacts, shell middens, hut-sites and other deposits.

The Australian Government's response to the World Heritage Committee's request is therefore grossly inadequate.



The Australian Government's decision not to extend the TWWHA beyond the tiny areas identified in Paragraph 3b ignores the outstanding universal value of Australia's greatest temperate rainforest, the Tarkine. Photo by Rob Blakers.

2.11 Paragraph 6 of the Committee's Decision – updated report

Requests the State Party to submit to the World Heritage Centre, by 1 February 2010, an updated report on the state of conservation of the property, including a revised Statement of Outstanding Universal Value and progress related to the above mentioned issues for examination by the Committee at its 34th session in 2010.

The State Party Report 2010 fails to address the crucial issues facing the TWWHA and adjacent tracts of temperate wilderness that contains outstanding universal values.



Tall eucalypts and rainforest are cleared to make way for plantations on the edge of the TWWHA (background). Photo by Rob Blakers, September 2008.

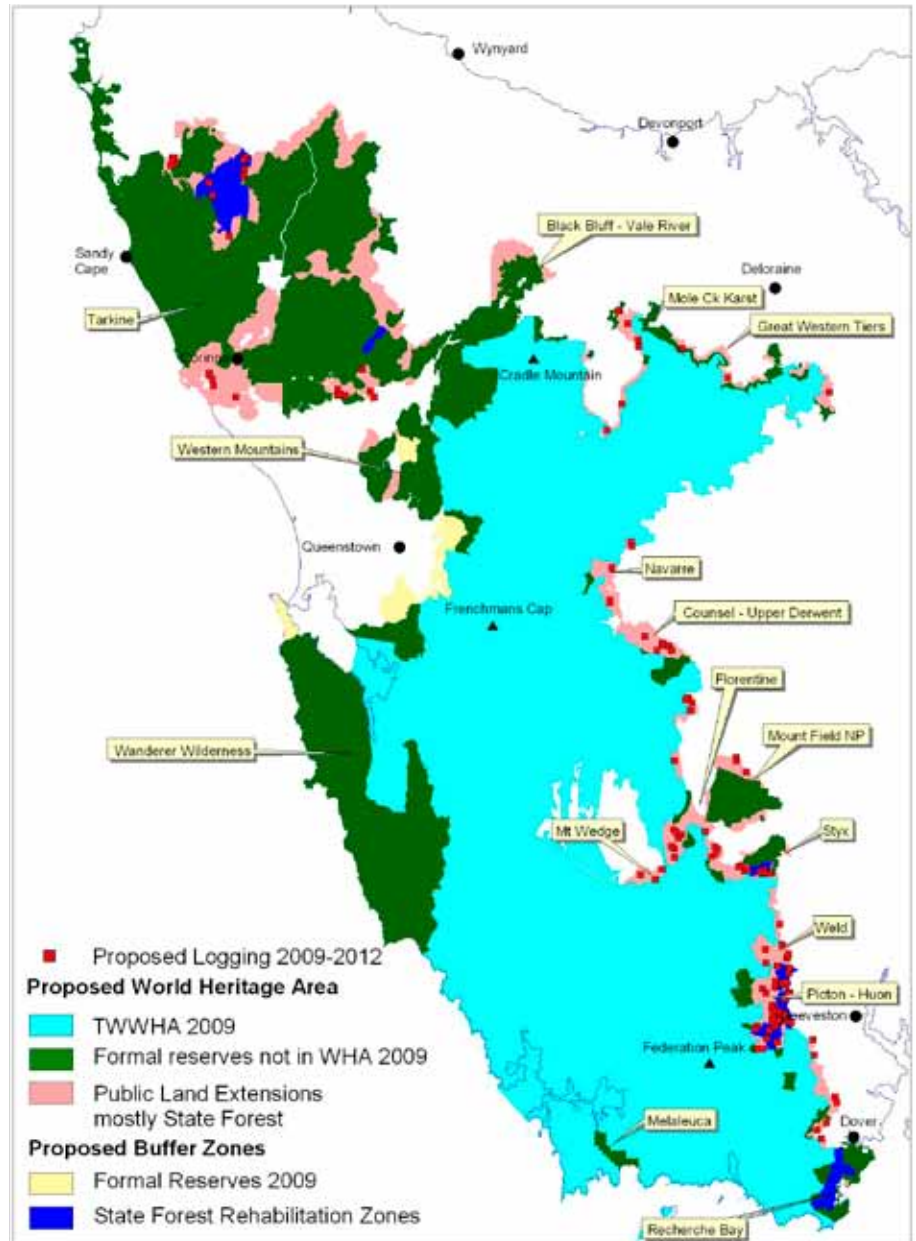
3. Impacts of Commercial Logging on the Outstanding Universal Values of Western Tasmania

Map 2 shows approximately 75 proposed logging coupes scheduled from July 2009 – June 2012 within areas of documented outstanding universal value in Western Tasmania. These include approximately 15 coupes in the proposed Tarkine (north-west) extensions; 9 in the upper Mersey / Great Western Tiers area; and well over 50 in the tall-eucalypt valleys of Tasmania's central and southern areas.

The enormity of this planned assault on Tasmania's wild and scenic heritage cannot be overstated. It ignores nearly three decades of reports into the outstanding universal values of this wilderness and the forests it contains. Due to time constraints, only a brief statement of the impacts can be supplied. They are as follows:

Scenery

One of the TWWHA's outstanding universal values is its spectacular scenery. Logging operations carried out in the vicinity of the TWWHA are visible from walking tracks, vantage points such as mountain peaks, and scenic flights. Though Forestry Tasmania has attempted (at public expense) to reduce these impacts through various forms of modified clearfelling in which clumps of standing trees are kept, the sight of heavily logged forest remains disturbing to the viewer.³¹ A disturbing compendium of photos in very recent forestry operations – roading, clearfell and aggregated retention (modified clearfelling) – is presented by the conservation organisation Still Wild Still Threatened in its March 2009 and 2010 reports to the IUCN and the World Heritage Committee.³²



Map 2. Scheduled logging areas 2009-2012 in public land of documented World Heritage Value adjacent to the TWWHA and in the Tarkine. Map by Matt Dell.

Biodiversity

The infamous Wielangta case demonstrates that the systems that govern logging operations in Tasmania cannot be relied upon to protect threatened species or their habitat.³³ Logging coupes in forests such as those of the Florentine have been shown to contain the vulnerable spotted-tail quoll and the endangered Tasmanian devil.³⁴ Operations associated with a new road proposed by Forestry Tasmania in the Tarkine have been referred to the federal Environment Minister due to likely adverse impacts on, *inter alia*, the Tasmanian devil.³⁵ Destruction of oldgrowth forest is universally known to destroy habitat of tree-hollow-dwelling species such as owls, bats, black cockatoos, pygmy possums, sugar gliders and many other species. Adverse impacts on nesting sites such as the wedge-tailed eagle have been recorded in forestry operations in the Styx and Salmon River areas, and by forestry operations more generally.

Gondwanic and other sensitive vegetation

The major threat to Gondwanic and sensitive alpine vegetation (which constitute one of the TWWHA's outstanding universal values) is fire. Forestry operations bring the threat of fire to this asset through:

- The possibility of regeneration burns escaping. Such burns have escaped and incinerated parts of the TWWHA at Lune River and Clear Hill in 1988 and 1989.³⁶ Forestry operations upwind of the Tarkine rainforests, the rainforests and mountains west of the TWWHA, the Mt Field National Park, and of parts of the TWWHA itself (slopes of the Snowy Range, Hartz Mountains, Walls of Jerusalem, Great Western Tiers and Central Plateau) all have the potential to destroy significant tracts of Gondwanic and other sensitive vegetation of outstanding universal value;³⁷
- Providing arsonists with access to sensitive vegetation. In 1983, an arsonist used a forestry road near Jackeys Marsh to light a fire which burnt sensitive alpine vegetation in what is now part of the TWWHA. In 1981, an arsonist lit a fire near a forestry road and hydro lake in the Mersey valley. The fire incinerated a magnificent tract of rainforest and alpine conifers on Mt Rogoona within what is now the TWWHA. In 2008, a deliberately lit wild fire burnt over 10,000 ha of moorland and rainforest.

Reducing the impact of arsonists necessitates reducing their access to sensitive areas.

Tall-eucalypt forests and giant trees

Impacts of forestry activities on tall-eucalypt forests and giant trees have been documented by Herrmann³⁸ and Law³⁹. Massive trees have been destroyed in recent years in valleys such as the Florentine and Styx. These include El Grande, the most massive hardwood tree then known on Earth, incinerated by a Forestry Tasmania burn in 2003. Only about 15% of Tasmania's original extent of tall-eucalypt forests are formally reserved. Approximately 34% have been cleared, and 44% have been logged and regenerated or are under threat.



The huge eucalypt called Gandalf's Staff (left) was discovered by the Wilderness Society in logging coupe SX013C in 2003 and protected only after a long campaign. El Grande (right) was burnt and killed by a Forestry Tasmania burn-off in 2003. The most massive known hardwood tree in the world, it subsequently crashed to the ground. These examples of giant trees being threatened or destroyed by Forestry Tasmania occurred despite guidelines for the protection of giant trees. Logging of similar forests is still occurring in 2010 in areas that should be part of an extended TWWHA. Photos by Geoff Law.

Karst

Karst features are part of the overlapping matrix of natural values that combine to make Western Tasmania a place of outstanding universal value. Karst is documented to occur in areas such as the Florentine, Styx, Weld and Huon valleys, with rare magnesite karst also occurring in the Tarkine. The Australian Government claims that the provisions of the Forest Practices Code protect karst. There are, however, documented examples of forestry operations penetrating sensitive karst landscapes with detrimental effects, such as the Riveaux area.⁴⁰

Even when the Forest Practices Code does protect particular karst features, the integrity of a wider landscape with rare overlapping values is lost when logging occurs.

Aboriginal heritage

Tasmanian Aboriginal cultural heritage sites are highly vulnerable to vandalism, as the tragic case of the Tarkine petroglyphs has shown.⁴¹ In 2009, a mia-mia, an Aboriginal structure made of tree-limbs which had survived intact near Cradle Mountain (but outside the TWWHA), was destroyed by vandals.⁴² No perpetrators have been found or prosecuted in either case, a common situation in Tasmania.



The government's Forests Practices Code did not prevent a logging road from being bulldozed over the top of this cave and disturbing the waters of this ancient subterranean system, less than two km from the TWWHA .



Bringing road-access for vandals by constructing logging roads to within a couple of hundred metres of Aboriginal heritage such as caves, cave stencils, artifacts, structures and other sites is reckless and irresponsible on the part of the Australian and Tasmanian Governments.

In summary, the proposed logging operations will have serious impacts on the integrity of the TWWHA as well as on outstanding universal values in adjacent tall-eucalypt forests and places of Aboriginal cultural heritage.

The upper Florentine forest, adjacent to the mountains of the TWWHA (background), is riddled with caves, some of which contain Aboriginal heritage up to 35,000 years old. In the foreground can be seen a forest defender's platform approximately 30 m above the ground in one of the giant eucalypts. A new logging road has now penetrated this very forest, and the foreground of this scene has been destroyed. Photo by Bob Brown.

4. Recommendations to the Australian Government

The IUCN and World Heritage Committee must hold firm on their recommendations to the Australian Government. Indeed, these should be strengthened by requesting that:

- The TWWHA be extended to incorporate all areas identified as important for integrity in the Floristic Values Report (2004), the Sharples Geoheritage report (2004), the Parks Wildlife and Heritage Report (1990), and the Hitchcock Report (2008), as encapsulated by Law (2009), and that, in the interim, all logging and road-building operations in these areas be halted.
- The land status of an extended TWWHA be upgraded to national-park equivalent in consultation with the Tasmanian Aboriginal community;
- Areas of Gondwanic vegetation, other rainforests and alpine vegetation of high sensitivity be replicated as much as possible within the TWWHA to bolster protection of outstanding universal values;
- No new logging roads be built in close proximity to the TWWHA due to dangers from arsonists and other vandals;
- No logging, forestry burns or other forestry operations be carried out in close proximity to the TWWHA unless it is agreed by conservation NGO stakeholders that such operations are necessary to manage fire risks to the TWWHA;
- The outstanding Aboriginal cultural values of sites within the TWWHA such as Bone Cave, Wurragarra Shelter, Wargata Mina and the Lemonthyme forest be explicitly acknowledged in the Australian Government's statement of outstanding universal values for the Tasmanian wilderness;
- Genuine and respectful consultation, engagement and negotiation with Aboriginal people occur regarding management of cultural heritage and the scheduling of forestry operations. Generous resourcing of Aboriginal groups to properly carry out management of their heritage sites must be provided.



A forestry burn off in the Weld valley close to the TWWHA blights a perfect Tasmanian autumn afternoon, polluting the atmosphere, exacerbating climate change and threatening adjacent oldgrowth forests. Photo by Rob Blakers, April 2008.

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