

Kooparoona Niara (Great Western Tiers) National Park

A Proposal

Friends of the
Great Western Tiers



Tasmanian
National Parks
Association




Great Western Tiers National Park Campaign

Mole Creek Caving Club Incorporated.




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The Mole Creek Caving Club is a speleological group that conducts research and exploration across the famous Mole Creek karst, hosting groups of visiting interstate cavers every year.
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The Wilderness Society Tasmania's mission is Protecting, promoting and restoring wilderness and natural processes across Australia for the survival and ongoing evolution of life on Earth.
wilderness.org.au

Friends of Great Western Tiers/kooparoona niara represents a group of people who love and seek to preserve this magnificent landscape. greatwesterntiers.org

Tasmanian National Parks Association is committed to the protection of Tasmania's national parks and reserved lands. We reinforce public values, concerns and criticisms to policy makers and managers, while promoting conservation awareness. tnpa.org.au

The Campaign for Great Western Tiers National Park is a long-running campaign to protect for perpetuity one of the most superlative landscapes in lutruwita/Tasmania.

A new Kooparoona Niara (Great Western Tiers) National Park, a consolidated Mole Creek Karst National Park and Extensions to Three Existing National Parks: A Proposal

This proposal is an exciting package that (should it be implemented) will deliver outcomes to enhance values and provide security for some of the world's most important remaining natural and cultural landscapes. Tasmania stands to gain international respect for observing its promises to UNESCO and increased positive profile in nature-based branding as a tourism destination. This proposal arises from a strong community support, with solid provision of evidence.

The signatories of this proposal pay our respects to the traditional owners of lutruwita/Tasmania, the palaw-pakana peoples and their Elders past and present. We acknowledge lutruwita/Tasmania is sovereign Aboriginal land that was never ceded and that, for land justice to take place, it must be returned to its rightful owners.

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Summary:

Kooparoona Niara (Great Western Tiers) National Park Proposal

This proposal is in response to the Tasmanian State Government inviting public comment on its proposed [Reservation of Future Potential Production Forest Land](#). (FPPF Land) in the Tasmanian Wilderness World Heritage Area (TWWHA). We appreciate the Government consulting with the community on this proposal.

Our response to this consultation is to propose that this opportunity be used to create a new National Park, called **Kooparoona Niara (Great Western Tiers) National Park**, which would be the first substantial new National Park created in Tasmania in about 30 years¹.

The bulk of the 16 reserves the Government is proposing to reserve would go into the creation of this new National Park, along with a large area of mostly World Heritage land on the escarpment and adjoining Central Plateau. The other remaining reserves would be added to adjacent existing National Parks including Mole Creek Karst National Park, Walls of Jerusalem National Park and Cradle Mountain-Lake St Clair National Park.

This proposal is being put forward by the Wilderness Society Tasmania, Friends of Great Western Tiers, Tasmanian National Parks Association, Mole Creek Caving Club and the Great Western Tiers National Park Campaign.

Land justice

The organisations and individuals supporting this proposal support lutruwita/Tasmania's First Peoples, the palawa-pakana.

As with all land on the island, the land being proposed to be reserved by the State Government is Aboriginal land.

The principles of land justice, self determination and the reconciliation of non-Aboriginal Tasmanians with the island's First Peoples inform this proposal.

We recognise it is the right of the island's First Peoples, the palawa-pakana people, to decide on what basis these reserves are to be returned to Aboriginal ownership. We believe that there must be an ongoing process of consultation and negotiation between the State government and the palawa-pakana community that recognises and supports palawa-pakana decision-making processes across the spectrum of tenure and management arrangements.

Negotiation, consultation and agreement-making must be culturally appropriate, as determined by the palawa-pakana, and enshrine the principles of free prior and informed consent as the basis of participation.

The rights and interests of the palawa-pakana should be recognised in all aspects of land and water management, as well as decision-making in relation to these lands and waters, regardless of current or future land tenure.

Through the State Government's proposed reservation of these areas, there is an opportunity for these 16 reserves to be returned to the legal ownership of the Aboriginal community. The Kooparoona Niara region is considered highly significant to the palawa-pakana people.

As well as a means to return land to legal Aboriginal ownership, the creation of Kooparoona Niara

¹ Last significant National Park creation was the expansion of Wild Rivers, Southwest & Cradle Mountain-Lake St Clair national parks to their current boundaries (more or less) in 1988-89

(Great Western Tiers) National Park is also an opportunity for the palawa-pakana community to manage this National Park through a sole management arrangement with the Tasmanian Parks and Wildlife Service.

We respectfully defer to the Aboriginal community to determine what it would like to happen to its land.

We believe that there could be a positive outcome whereby the first substantive new National Park in lutruwita/Tasmania for about 30 years is also returned to and managed by the island's First Peoples, the palawa-pakana. If that scenario was supported by the island's Aboriginal community, that would be something that the signatories to this submission would welcome and support.

Government Promises

In 2015 the International Council on Monuments and Sites (ICOMOS) and the International Union for Conservation of Nature (IUCN) reported on the management and conservation status of the TWWHA. They made 20 recommendations to address concerns about the extent to which Australia was meeting its obligations under the World Heritage Convention. Recommendation 11 stated that the FPPF lands within the World Heritage Area (WHA) should be given National Park status. At the time, the Commonwealth Government and Tasmanian State Government (TSG) supported all of the recommendations.

Need for Appropriate Tasmanian Land Tenures for World Heritage Area

The 2016 Tasmanian Wilderness World Heritage Area (TWWHA) Management Plan recognises the Outstanding Universal Value of the area and provides protection of its natural and cultural values under Australia's obligations to the World Heritage Convention and under the Commonwealth Environmental Protection and Biodiversity Conservation (EPBC) Act. All the areas of FPPF in the TWWHA adjoin and enhance larger areas which are either existing National Parks or are of demonstrated National Park quality, and so should be given National Park tenure. The TSG is proposing to give the World Heritage FPPF either Conservation Area or Regional Reserve status. Both these tenures allow logging and mining (see Appendix). Currently the remainder of the TWWHA is under a mixture of State tenures. The proposed Kooparoona Niara (Great Western Tiers) National Park area is mainly Conservation Area as well as World Heritage. Thus we have the anomaly that under the TWWHA Management Plan logging and mining are excluded from the area, while the same area is under a State tenure which has logging and mining as part of its management objectives. This sends a poor signal to prospective visitors and shows the Government's lack of respect for the Outstanding Universal Values of these areas.

Mole Creek Karst National Park Consolidation

The Mole Creek Karst National Park (MCKNP) does not adequately protect the catchments and processes that safeguard this landscape of caves with their World Heritage values. This is because it has arisen in a piecemeal fashion since its inception in the late 1990s. Much of the adjoining karst dedicated for conservation outcomes since then is Conservation Area. The TSG's proposal to dedicate the karst and karst catchment FPPF lands within the TWWHA as Regional Reserves further complicates the tenure mosaic as well as its management. Regional Reserves allow activities that can be inconsistent with conservation outcomes commensurate with the significance of the karst estate. Therefore, to properly protect these World Heritage grade areas, it's not enough to expect them TWWHA Management Plan to do what National Park tenure does and offer proper protection. The Mole Creek karst landscape will be better protected by consolidation of conservation tenures, not further fragmentation.

Extensions to Cradle Mountain Lake St Clair National Park, Walls of Jerusalem

National Park and South West National Park

High conservation value forests of World Heritage status fringe these iconic National Parks. Many of these tracts of forest have been subject to contentious and divisive political battles over many years. It is clearly ludicrous to propose any status short of secure National Park status for these FPPF forests. To do so presents a clear opportunity for increasing Tasmania's credentials in the international arena. We note that the Government has a plan for the state to be a world-leading eco tourism destination.² Protecting these areas as National Park additions would be in line with this aspiration.

Regional Reserves leave open the possibility of a return to the "forest wars" should future extractive industries, such as logging and mining, be allowed back into these (currently) FPPF forests, as permitted under Conservation Area and Regional Reserve status.

² p5, [T21 Visitor Economy Action Plan](#), Tasmanian Government, 2020

Background

The Tasmanian State Government (TSG) has proposed to reserve 16 areas of informally-protected High Conservation Value forest reserves. The reserves are already within the Tasmanian Wilderness World Heritage Area and roughly track along the edge of this area's boundary, broadly south of Deloraine. Most of the reserves fall within what has previously been proposed as Great Western Tiers National Park.

There are also two areas of informal reserve south of Lake Gordon and additional 'satellite' reserves adjacent to Walls of Jerusalem National Park and Cradle Mountain-Lake St Clair National Park, which we propose should be added to these National Parks.

There are two tenures the TSG [proposes](#) to formally reserve these informally-protected reserves. Six of the reserves are proposed to become Regional Reserves and 10 would become Conservation Areas.

Lots 106, 107, 108, 109, 100 and parts of Lot 111 and Lot 113 are proposed by the TSG to become Regional Reserves.

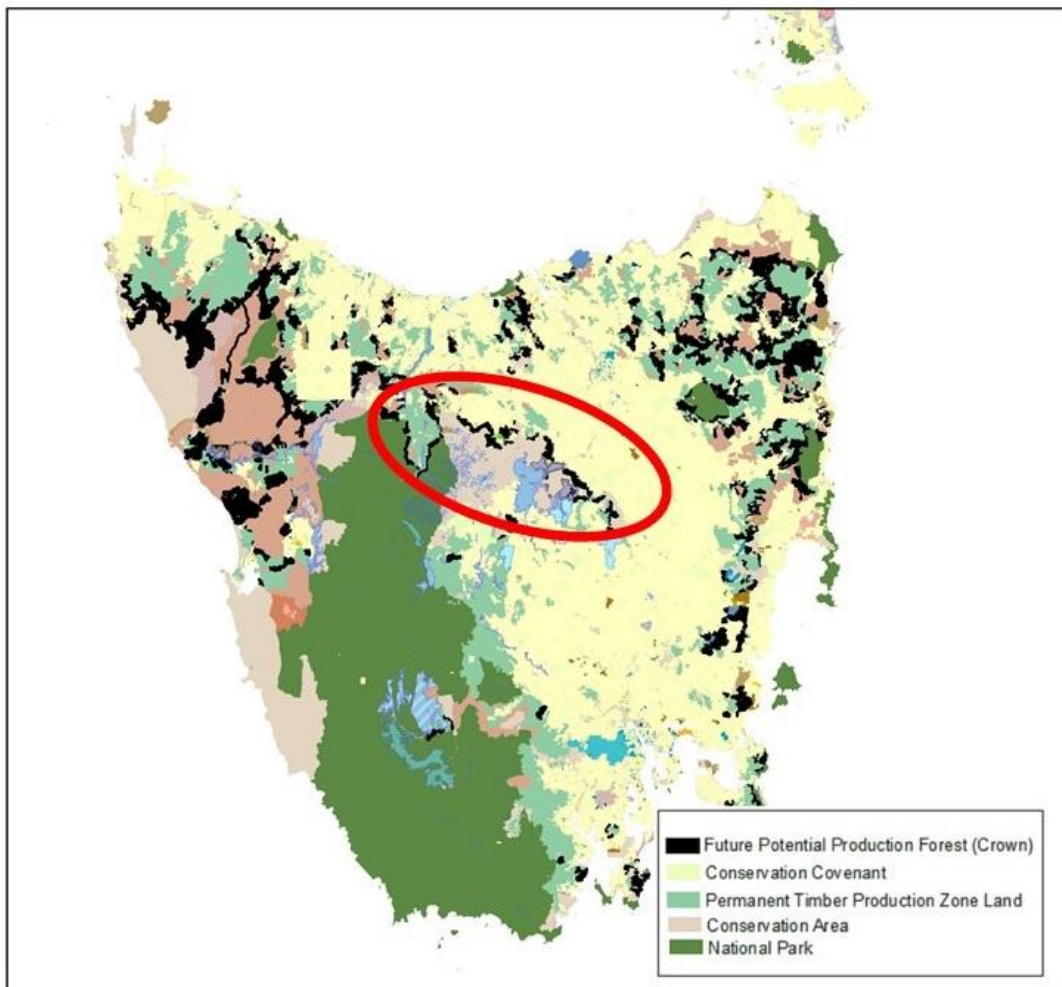
All the other Lots - most of Lot 111, plus Lots 112, 125, 126, 128, some of Lot 129 and Lots 214, 242 and 245 - are proposed by the TSG to become Conservation Areas.

Where did these reserves come from?

These 16 Lots - informally-protected reserves - were created through the Tasmanian Forest Agreement as World Heritage Area extensions. However, rather than formally protecting them at the time, the Tasmanian Forest Agreement (TFA) 'parked' them for future reservation. As such, through the legislating of the Tasmanian Forest Agreement Act 2013, they were created as informal reserves and their tenure was named Future Reserve Land.

The reserves were created to be extensions to the then Tasmanian Wilderness World Heritage Area, as the map below shows. The map was created by the Independent Verification Group, established by the TFA process, to assess the quality of land that was to be protected. These 16 lots were included in the TWWHA in 2013.

On the map below, the black areas are FPPF, and the red ellipse highlights the main areas of World Heritage FPPF that the current process is concerned with. They run along the base of Kooparoona Niara (Great Western Tiers) and, in the Upper Mersey Valley, on the fringes of the Cradle Mountain Lake St Clair National Park and the Walls of Jerusalem National Park.



[Schedule 1](#) of the TFA Act lists all these Future Reserve Land reserves as numbered ‘lots’. When this Act was repealed and replaced by the Forestry (Rebuilding The Forest Industry) Act 2014, the Forestry Act carried over the same informal reserve list of lots that can also be found in [Schedule 1](#) of the Forestry (Rebuilding The Forestry Industry) Act.

In replacing the TFA Act with the Rebuilding The Forestry Industry Act, the tenure of all these reserves was changed from Future Reserve Land to Future Potential Production Forest Land (FPPFL). This means that the underlying tenure was changed from a conservation tenure to a logging tenure.

The Tasmanian State Government is in the interesting position of now proposing to reserve informally protected reserves that were previously on a conservation pathway - “Future Reserve Land” - which it then changed to a logging tenure - “Future Potential Production Forest Land” - and which it is now proposing to change back again to conservation tenure.

As part of the TFA process, these 16 reserves were nominated for protection and were assessed by the Independent Verification Group and found to have such high High Conservation Values that UNESCO recognised them as having World Heritage-grade conservation values. This means that these reserves have such High Conservation Values that they fulfil the criteria of Outstanding Universal Value, which any World Heritage property needs to achieve to be inscribed as a World

Heritage property.

This has been confirmed by UNESCO itself after representatives (Reactive Monitoring Mission) visited the island in 2015.

What the State Government is now specifically proposing with these 16 reserves in particular - converting them to Regional Reserves and Conservation Areas - is the lowest possible level of protection. These tenures allow logging and mining, in stark contrast to the requirements of World Heritage management. Background information on these tenures is provided in the Appendix.

Regarding the Regional Reserve tenure: The purpose of reservation is for mineral exploration and the development of mineral deposits and/or the controlled use of other natural resources, including special species timber harvesting, while protecting and maintaining the natural and cultural values.

Because the primary purpose of this reserve category is no longer conservation it does not fit within the cone of meaning of any of the IUCN reservation classes, not even the weakest Category VI which allows for sustainable resource utilisation so long as the primary purpose is conservation. This tenure class is wholly inappropriate to be used in a World Heritage Area and clearly does not meet the intent of the Reactive Monitoring Mission Recommendations 2 and 3.

If the TSG is serious about protecting World Heritage values, then surely it needs to assign a tenure that does not allow logging or mining, ie National Park.

Governments' National Park pledge

A UNESCO Reactive Monitoring Mission (RMM), auspiced under the World Heritage Committee, visited lutruwita/Tasmania in 2015.

The RMM explicitly considered the issue of Future Potential Production Forest (FPPF) Land within the TWWHA, and the fact it was legally excluded from coverage of the TWWHA Management Plan.

Through its ensuing report (see Annex), the RMM issued a list of recommendations, including recommendation 11 that:

“Future Potential Production Forest Land (FPPFL) within the property should not be convertible to Permanent Timber Production Zone Land (PTPZL) and should be granted status as national park”³ (emphasis added, page 3).

These recommendations - including to protect these 16 reserves as National Park - were welcomed and accepted by State and Commonwealth Liberal governments at the time. This positive response was both public and made clear in subsequent reports by both governments to UNESCO's World Heritage Committee.

The Commonwealth Liberal Environment Minister, Greg Hunt, and the Tasmanian Liberal Environment Minister, Matthew Groom, put out a shared statement in response to the recommendations from the RMM on 20 March 2016. They said that:

“The report provides 20 clear recommendations that will help our governments improve the way the TWWHA is managed and we accept these recommendations.”⁴

Then Environment Minister Greg Hunt also said:

“We are committed to ensuring that the Outstanding Universal Value of the Tasmanian Wilderness World Heritage Area is protected and maintained for future generations.”⁵

This positive stance was reiterated twice subsequently in 2016 and 2018 through formal correspondence with the World Heritage Committee. The Commonwealth Government in its capacity as State Party and signatory to the World Heritage Convention, produced a 'State of Conservation' report on the TWWHA. In this report it said that it supported the RMM's recommendations and said that it supported their implementation.

It said, in the State of Conservation report 2016:

“The Australian and Tasmanian governments support all 20 recommendations set out in the mission report. The recommendations will be given effect through the new management plan for the property and through other statutory measures.” (emphasis as per original)⁶

It said, in the State of Conservation report 2017:

“The Australian and Tasmanian governments are fully committed to protecting the Outstanding Universal Value of the property. All of the recommendations of the 2015 Reactive Monitoring Mission and the 2016 requests of the World Heritage Committee are being implemented through

³ [Report: Reactive Monitoring Mission to the Tasmanian Wilderness](#), International Council on Monuments and Sites - ICOMOS, International Union for Conservation of Nature - IUCN, Australia, November 2015

⁴ Greg Hunt MP, greghunt.com.au, '[Monitoring mission report on the Tasmanian Wilderness World Heritage Area endorses Australia's management efforts](#)', 2016

⁵ Greg Hunt MP, greghunt.com.au, '[Monitoring mission report on the Tasmanian Wilderness World Heritage Area endorses Australia's management efforts](#)', 2016

⁶ [Report: Reactive Monitoring Mission to the Tasmanian Wilderness](#), International Council on Monuments and Sites - ICOMOS, International Union for Conservation of Nature - IUCN, Australia, November 2015

a new management plan for the property and other statutory measures.”⁷

Honouring the Government's word

The State Liberal and Commonwealth Coalition governments have repeatedly pledged that these informal reserves would be protected as a National Park within the World Heritage Area.

Yet the State Government is now proposing to reserve these areas at the lowest possible conservation levels.

Creation of Kooparoona Niara (Great Western Tiers) National Park and enactment of our proposed extensions to existing National Parks is a huge opportunity to properly protect World Heritage-grade landscapes the government has previously pledged that it would.

If the FPPFL on the lower slopes of Kooparoona Niara (Great Western Tiers), which include only parts of the natural and values of the area and miss much of the Aboriginal cultural values, are worthy of National Park status as given in Recommendation 11 of the RMM, then what of the remainder which is rich in these values. Surely the rest deserves National Park status as well.

⁷ *ibid*

Further Concerns with State Government proposal

Zoning change from Wilderness

The Government's website (on its "Frequently asked questions" page) states that "Recreation and Self-Reliant Recreation Zones are proposed for the areas of land to be reserved under the *Nature Conservation Act 2002*."

We would hope that this statement is somewhat of a misprint. But if it is an actual statement of the Government's intent, i.e. that *all* of the FPPFL lots are to be zoned in this way after reservation, it is a grave departure from what is a most solemn promise in the TWWHA Management Plan.

This Plan clearly implies that the areas of FPPFL lots 106, 107, 108 and 109 are to be zoned as "Wilderness", and managed accordingly, when they become reserved. To do otherwise is to weaken the protection of the Outstanding Universal Value, and is a contradiction of what the Government has previously promised both the public and wider authorities that they will do.

The TWWHA Management Plan is formulated under Part 3 of the National Parks and Reserves Management Act 2002, a Tasmanian State Act, and therefore cannot apply to unreserved land. However, there are obligations via the Australian Government as a State Party to the World Heritage Convention to ensure that the requirements of the Convention are fully met over the entire extent of the Property.

Accordingly, the non-statutory "Strategic Management Statement" has been appended to the Management Plan (starting on page 206). The point of this "Statement" is to reassure Commonwealth and international authorities that appropriate management regimes are in place, and will continue to be in place, over the whole area, including what is now FPPFL. It provides "statements of policy intent and additional management direction" for land managed by the Crown. This material is clearly presented as a solemn promise of what the State government will do in the future, and is relied upon by the World Heritage Committee as guaranteeing sufficient protection of the Property's values.

Section 10.2.5 of the Management Plan relates to Future Potential Production Forest Land. Among other things it ensures that mineral exploration and extraction (with one small exception), and special species timber harvesting will not be permitted. Given that logging and mining are permitted in Conservation Areas and Regional reserves, the assignment of these classifications to FPPFL is clearly a breach of the spirit of

TSG's promises under the Strategic Management Statement.

It also states that "Crown Land FPPFL that becomes reserved land will be zoned according to maps 24 and 25". These maps (pages 217 and 219) clearly indicate the proposed zoning, including that lots 106, 107, 108 and 109 are to be included in the "Wilderness" zone (apart from possibly a small number of tracks shown on the maps near lots 108 and 109).

To now propose to vary the zoning (which would allow prospecting, hunting and apiary among other things, with likely detrimental effects on the protection of world heritage values) would be a clear breach of the State government's undertakings required by the Convention. This must not occur.

Fragmenting reserves

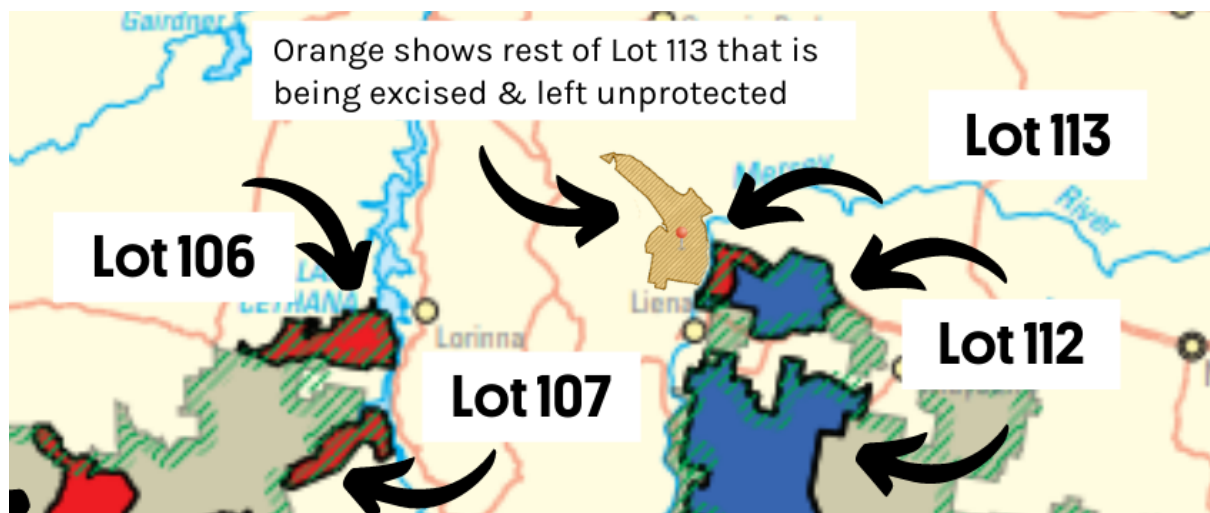
There are two instances in the State Government's proposal that would significantly fragment

existing reserves.

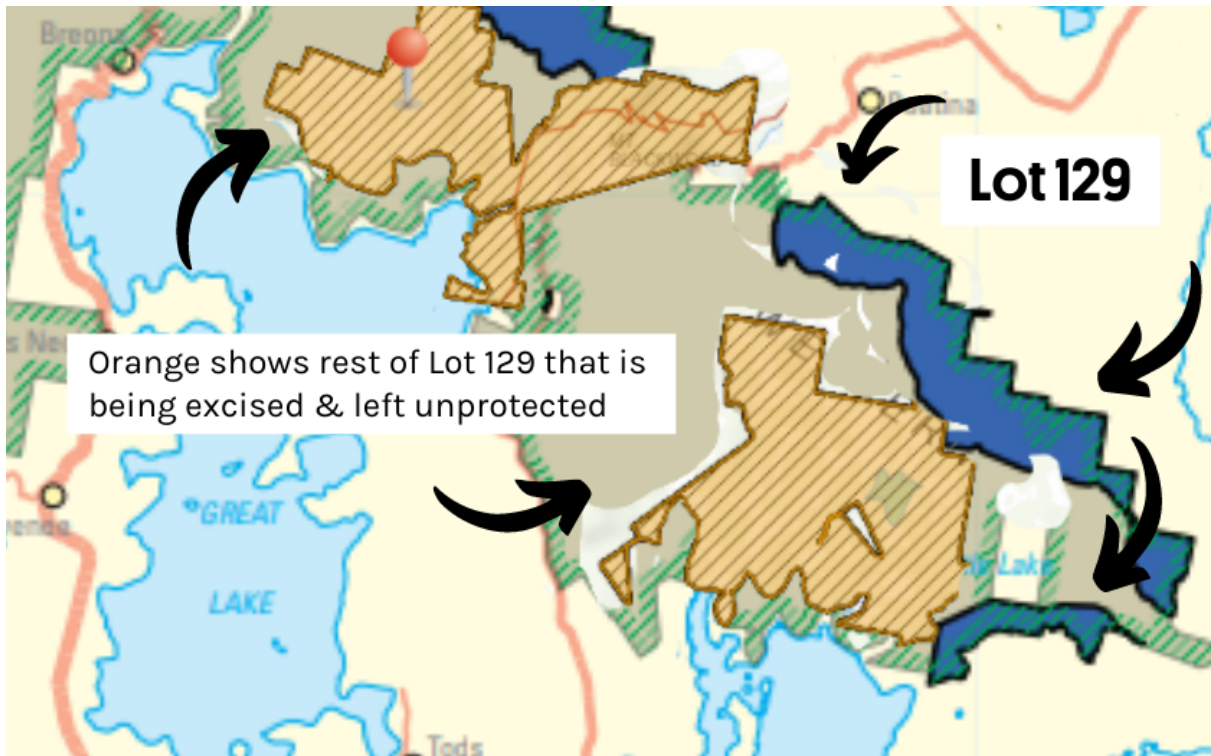
Lots 113 and 129 would be split up, with part of each of these reserves proposed to be a Regional Reserve and part of Lot 129 proposed to be a Conservation Area. The majority of the two reserves would remain informal reserves as FPPF land. This means, for example, that only about 25% of Lot 129 would be protected through this process. The majority portion of Lot 129 is owned by Hydro Tasmania. It is also in the TWWHA. Splitting existing reserves and changing parts of their tenure will fragment reserve classes in an already incredibly fragmented area. The complex mixture of tenures in this area is regularly and accurately described as a dog's breakfast.

This proposal is an opportunity to add logic and harmony, but splitting up existing reserves will have the opposite effect.

The map below shows, in orange, the rest of Lot 113 that has been left off the Government's maps and which is proposed to be unprotected and excised from the rest of Lot 113 (in red) that is proposed to be a Regional Reserve.



The map below shows, in orange, most of the rest of Lot 129, which has been left off the Government's maps and which isn't proposed to be protected but which is proposed to be excised from the rest of Lot 129 (in blue).



Opportunities from the proposed new park and park extensions

It affords ecological integrity

At a time when the planet has never needed to protect ecosystems, forests, rivers and landscapes more than it does today, there is a strong need to protect rich, unspoiled ecosystems, which is what this National Park would facilitate. The intactness and ecological credentials of these areas have been assessed, proven and accepted by UNESCO as World Heritage-grade reserves.

As Environment Minister Greg Hunt said at the time: “We are committed to ensuring that the Outstanding Universal Value of the Tasmanian Wilderness World Heritage Area is protected and maintained for future generations.”⁸

It strengthens the Tasmanian Wilderness World Heritage Area

A new National Park within the Tasmanian Wilderness World Heritage Area would strengthen the ecological integrity of the TWWHA, which would bring with it myriad co-benefits for biodiversity, the local community and to the nature tourism economy.

It’s an opportunity for Land Justice and Land Returns

The island’s First Peoples, the palawa-pakana, have the right to determine what should happen to their own land and on what basis it is returned to legal Aboriginal ownership. Kooparoona niara (Great Western Tiers) National Park is an opportunity not just for land returns but for sole or dual National Park management.

It could lead to a new land tenure for Aboriginal National Park management

Unlike other states and territories, Tasmania still lacks a land tenure for Aboriginal management of National Parks. If the Aboriginal community so chooses - and we respect its rightful integrity to do so - this is an opportunity to create a new tenure of Aboriginal National Park management.

It was promised

An important reason to follow through on the State and Commonwealth government’s pledge to properly protect these areas as a National Park is because this is what was previously promised. The State Government should honour its word.

It’s tidy

This area south of Deloraine where most of these reserves are located is a mesh of reserves, conservation areas, non-contiguous areas of National Parks and other reserve classes. By implemented the recommendations in this submission, the Government would harmonise the following:

- the reserve/s adjacent to Walls of Jerusalem National Park by adding them to that National Park
- those reserve/s adjacent to Cradle Mountain-Lake St Clair National Park to that National Park
- those reserves adjacent to South West National Park by adding them to that National Park
- the complexity of reserves adjacent to Mole Creek Karst National Park by adding them to that National Park.
- the complexity of reserves around the Great Western Tiers area by creating Kooparoona Niara (Great Western Tiers) National Park

⁸ Greg Hunt MP, greghunt.com.au, ‘[Monitoring mission report on the Tasmanian Wilderness World Heritage Area endorses Australia’s management efforts](#)’, 2016

Therefore, this is an opportunity to bring order and consistency to the reserve network in this area and to do so on an ecologically-logical basis that would enhance the ecological integrity of this region.

It's good for tourism

Tasmania hasn't had a significant new National Park created for about 30 years. Tasmania was already struggling to provide an adequate range of destinations when the tourism industry was flourishing before the Covid pandemic.

The tourism industry [has a plan](#) for Tasmania to be the 'eco-tourism' capital of the world. Creating a new National Park would strengthen this aim.

The head of the Tourism Industry Council Tasmania (TICT) Luke Martin wrote in an opinion piece in 2018:

"Our natural areas are the number one reason visitors come to Tasmania, and our magnificent national parks underpin vibrant visitor economies across regional Tasmania."⁹

It's good for the region

A new National Park would create a well-defined destination for day trips and associated tourism ventures from Deloraine, Devonport and Launceston.

As well as creating an entirely new and long-called-for national park, this proposal would also see the enhancement of Cradle-Mountain-Lake St Clair National Park, Walls of Jerusalem National Park, South-West National Park and Mole Creek Karst National Park. This would create myriad co-benefits for local ecosystems, the local community, the local economy and for Tasmania's reputation as a global nature tourism destination, something the government says it is committed to.

It's something supported by the local community

People in the area have called for the creation of a National Park at Great Western Tiers for years. This is an opportunity to deliver on a locally-supported National Park that bears social licence.

It's good for jobs

According to a report by the Tourism Industry Council of Tasmania,

"The economic value of the Tasmanian Wilderness World Heritage Area, from the impact of visitor spending alone, was estimated at \$721.8 million in the year ending June 2007 – supporting approximately **5,300 jobs** in the state."¹⁰

A new National Park is likely to have a positive impact on local employment opportunities both directly and indirectly. There is already a tourism 'sub brand', called [Great Western Tiers](#) and associated tourism infrastructure, such as a [GWT Tourism Association](#) and a GWT Visitor Centre located at 98-100 Emu Bay Road, Deloraine. A new National Park would leverage on and be supported by this pre-existing infrastructure and vice-versa.

It's great timing

While the Tasmanian community is recovering from the impacts of Covid, and while the tourism

⁹ "[Let's not go down path to bitter division](#)", Luke Martin, The Mercury, Nov 8 2018

¹⁰ Page 3, [A representation by Tourism Industry Council Tasmania regarding the Draft Tasmanian Wilderness World Heritage Area \(TWWHA\) Management Plan 2014](#), 2015

sector is rebuilding too, it is good timing to create an enhanced tourism destination as part of this rebuilding process. The creation of a new National Park could arguably be considered a practical way for this area to 'build back better'.

It enhances Tasmania's global reputation

All the opportunities above, when combined, including the enhancement of the Tasmanian Wilderness World Heritage area, would enhance the island's global reputation as a leader in ecologically-grounded tourism. In doing so it would also be an investment in 'Brand Tasmania'.

palawa-pakana heritage in Kooparoona Niara region

The area is rich in the heritage of lutruwita/Tasmania's First People, the palawa-pakana. This includes prominent sites associated with the sandstone cliff overhangs and in the vicinity of the lakes, as well as important sites throughout the area.

The whole landscape is of deep cultural significance to the First People, past and present. The Tasmanian Aboriginal Land Council or Tasmanian Aboriginal Heritage Council can provide any information on the significance of the Aboriginal cultural property.

The Tasmanian Wilderness World Heritage Area (TWWHA) is one of only two World Heritage properties recognised for as many as seven out of a possible ten criteria. The TWWHA Management Plan (2016) recognises the need for meaningful Aboriginal involvement in the management of the World Heritage Area and that Aboriginal cultural values can only be determined, understood and managed by Aboriginal people, ensuring the correct management for each cultural site/landscape. The International Council on Monuments and Sites (ICOMOS) (2020) recognises the TWWHA as a contiguous Aboriginal cultural landscape and urges safeguarding of this heritage.

Recommendations

Below are five recommendations - A to E - that outline what we believe is the best way to manage the conservation of the proposed reserves. Each one includes an indicative map. The order in which the recommendations are presented here does not imply any hierarchy of importance.

- [Recommendation A](#) proposes the three northernmost reserves are added to Cradle Mountain-Lake St Clair National Park
- [Recommendation B](#) proposes that the reserves adjacent to Lake Rowallan are added to Cradle Mountain-Lake St Clair and Walls of Jerusalem national parks to which they are adjacent.
- [Recommendation C](#) proposes that the reserves adjacent to Mole Creek Karst National Park are added to this national park.
- [Recommendation D](#) proposes the three reserves south of Lake Gordon are added to South-West National Park
- [Recommendation E](#) proposes the creation of Kooparoona Niara (Great Western Tiers) National Park.

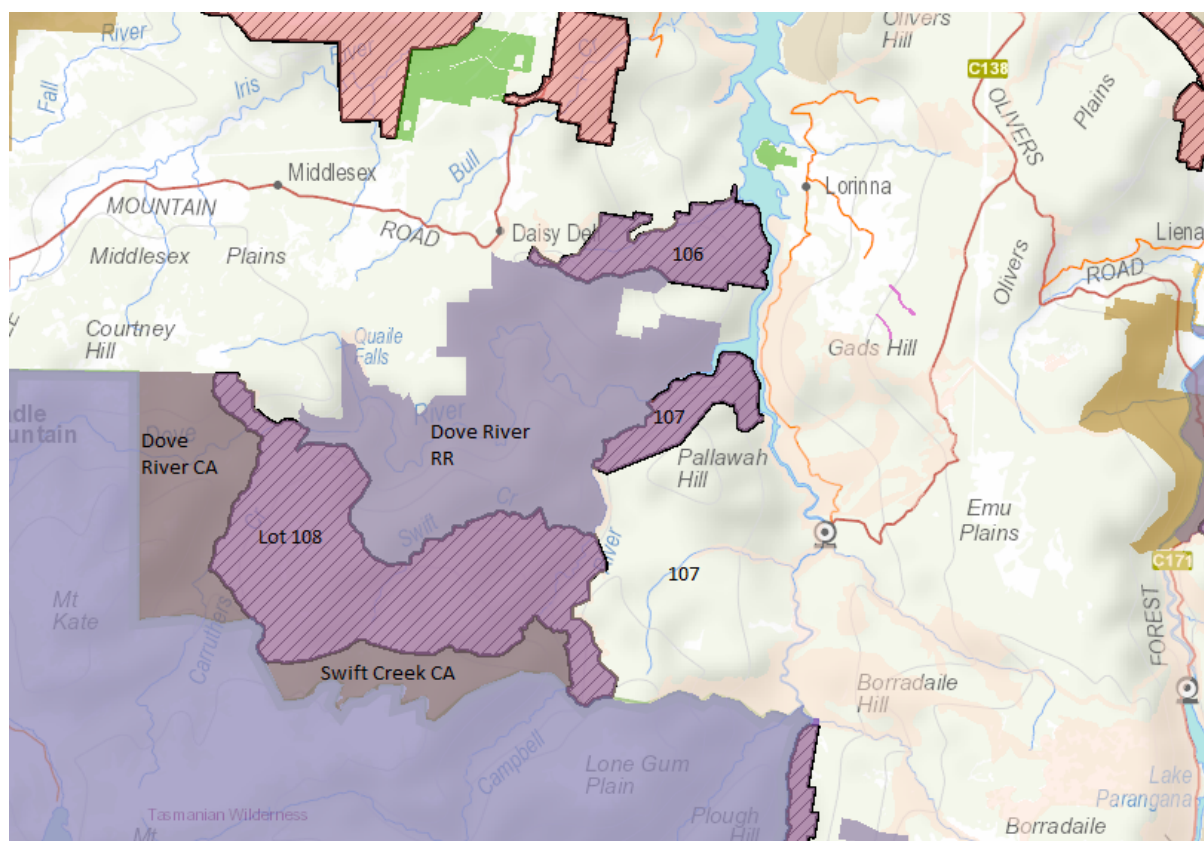
Recommendation A: Cradle Mountain-Lake St Clair northern addition

The northernmost reserves that the Tasmanian State Government is proposing to reserve are all adjacent to the Dove River reserve network and cumulatively represent a mixture of different reserve classes.

In line with what the State and Commonwealth governments have previously pledged, to harmonise this area and to respect the ecological integrity and to enhance its ecological intactness, it is logical to add these Lots and the adjacent Dove River reserves to the adjacent Cradle Mountain-Lake St Clair National Park.

This would mean:

Lots 106, 107 and 108, plus Dove River Regional Reserve, Dove River Conservation Area and Swift Creek Conservation Area are added to Cradle Mountain-Lake St Clair National Park.

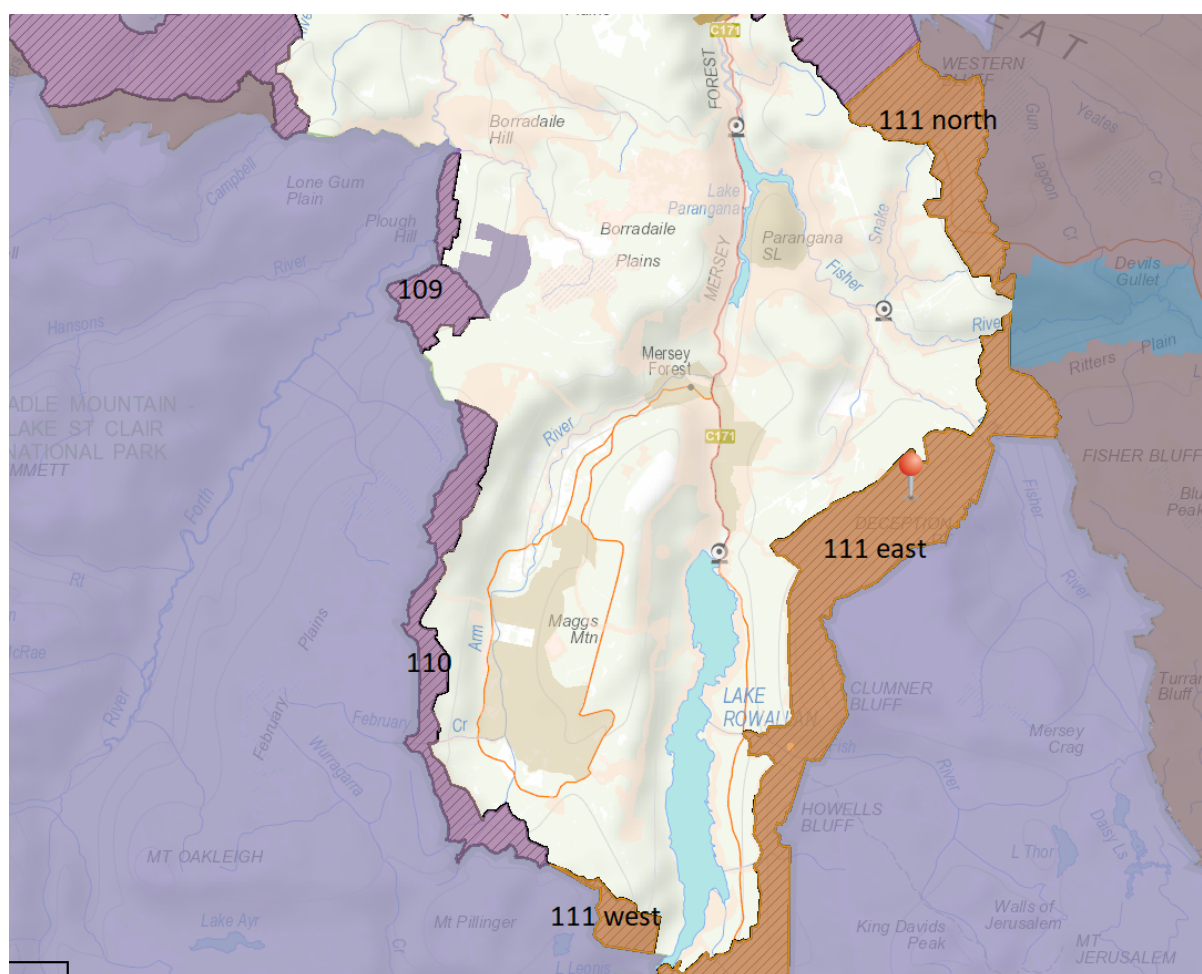


Recommendation B: Cradle Mountain-Lake St Clair and Walls of Jerusalem additions

In line with the pledge of State and Commonwealth governments to give these informal reserves around Lake Rowallan national park status, it would also harmonise the variety of tenures and enhance the ecological integrity of this area to do the following:

Add Lot 109, Borradaile Regional Reserve, Lot 110 and the western portion of Lot 111 at the south-west tip of Lake Rowallan to Cradle Mountain-Lake St Clair National Park, which they are already adjacent to and contiguous with.

For the same reasons, it's logical to add the eastern portion of Lot 111 to Walls of Jerusalem National Park to which it is adjacent to and contiguous with.

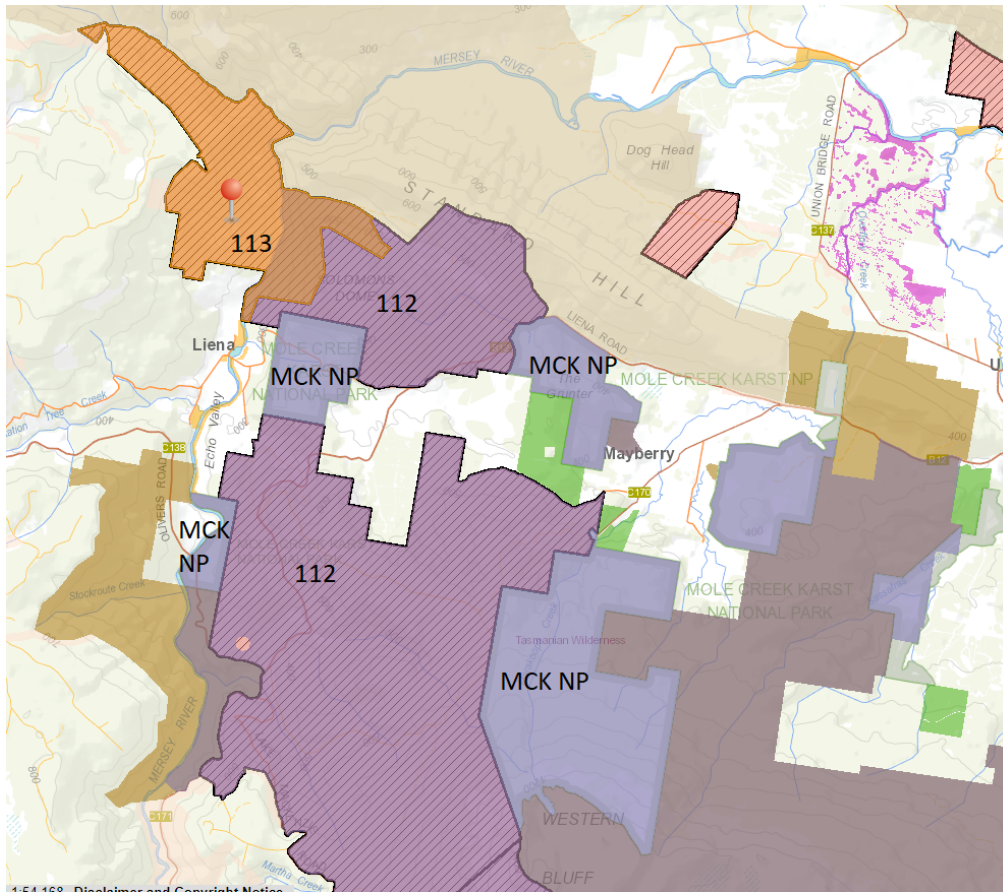


Recommendation C: Mole Creek Karst National Park additions

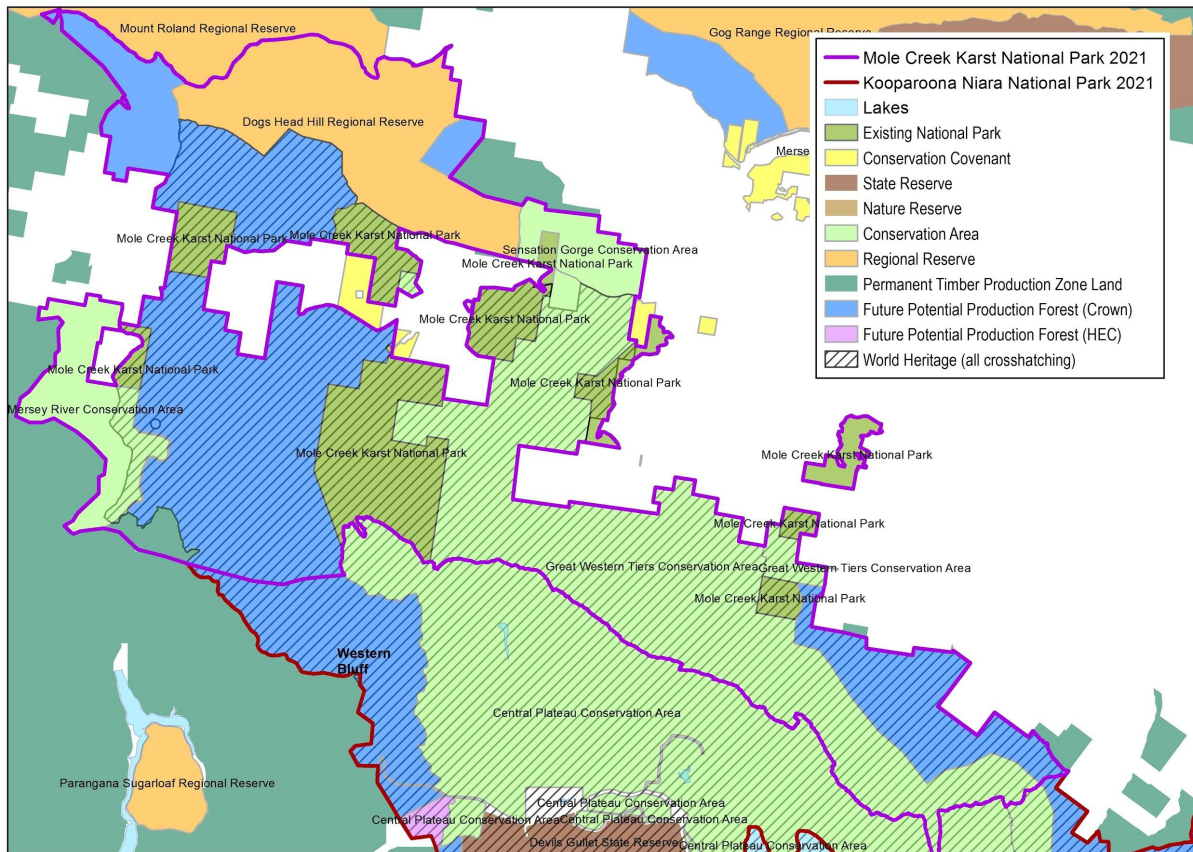
Lots 112 & 113 added to Mole Creek Karst NP. Lot 113 in its entirety - not the proposed govt cutoff

Lot 112 is in two portions and is known karst (Ref Rolan Eberhard). Both portions are contiguous with MCKNP (Loatta King Sol Dome block)

The majority of Lot 113 is outside the TWWHA but is mantled karst and karst catchment.



This is an opportunity to consolidate the complexity of tenures in the karst area into a single tenure - Mole Creek Karst National Park. The proposed boundaries of the consolidated park are shown in the map below:



To the east, the proposed extended/consolidated Mole Creek Karst National Park includes catchments to the Lobster Rivulet drainage divide on Nells Bluff (reference: Conservation of Freshwater Ecosystem Values (CFEV)). To the west, the boundary includes catchments to the Mill Creek drainage divide off Western Bluff. As well as the FPPF Lots in question, the consolidated park includes Dogs Head Hill Regional Reserve, Mersey River Conservation Area, Sensation Gorge Conservation Area and parts of the Great Western Tiers Conservation Area.

Karst is a landscape containing caves and underground water courses. The Mole Creek karst is one of the largest and most densely cavernous landscapes in eastern Australia, with cavernous limestone cropping out to the surface over 26 km E-W and 10 km N-S. Agricultural land generally occupies alluvial valleys between lowland forested or wooded ridges which contain caves and underground streams. Over 450 caves are known, and research continues.

Cave tourism began early in British colonisation. There are now two popular public show caves, while the undeveloped caves of Mole Creek have long been a favourite destination for interstate and even international speleologists and recreational cavers. Access to several iconic caves are controlled by Limited Access status, secured by locked gates and maintained jointly by local speleological groups and the Parks and Wildlife Service.

The caves of the Mole Creek karst, their World Heritage values and even local water supplies are dependent on the conservation of natural processes and the protection of catchments. Mole Creek is a *fluviokarst*, which means its catchments extend onto adjoining flanking (non-cavernous) highlands (including the scarp of the Central Plateau to the south). The values of Tasmania's karst estate, including Mole Creek, feature prominently in the natural and cultural values of the TWWHA (Appendix). At Mole Creek, these values include a suite of Tasmania endemic cave-adapted invertebrate fauna linking back to Gondwana, well developed geomorphology including several breaches of surface drainage divides by underground streams and cave development linked to

glacial processes. For full value statements and relative international significance see Appendix.

It has long been recognised as problematic that conservation tenures vary and that much of the Mole Creek karst *landscape* (including many caves) and its catchments are not protected by secure conservation tenure (e.g. Kiernan, 1989; Parks and Wildlife Service, 2004). The present Mole Creek Karst National Park arose in 1997 from the collective rededication of 11 separate small former State/Scenic Reserves scattered across the district; typically, small squares drawn around cave mouths while the caves intended to be protected by the reserves extended under adjoining tenures. Since this time, some small but important additions have been made to the MCKNP and a Conservation Area has been created over some of the former State Forest to improve protection of karst systems (underground streams and caves). However, much of the karst estate at Mole Creek remains in Conservation Area tenure and much unprotected in state forest (see Map X).

The present consideration of FPPF World Heritage lands affords an opportunity to revise conservation tenures of the TWWHA extensions. Consolidation of tenures into national park would address shortcomings and management problems inherent in the mixture of tenures. After all, karst is a landscape unit, not a group of unconnected caves. It is further noted that small MCKNP additions essential to the contiguous conservation status have occurred since the MCKNP Management Plan 2004. These National Park additions complete one connected karst drainage feature; namely, the Sassafras/Mayberry drainage system. However, they are outside the TWWHA that they adjoin. Thus, karst systems (caves and streams) pass in and out of the TWWHA. This nonsensical situation clearly requires redress by TSG by addition to the TWWHA.

Kiernan, K., 1989: *Karst, Caves and Management at Mole Creek, Tasmania*. Occasional Paper No. 22, Department of Parks, Wildlife and Heritage, Hobart.

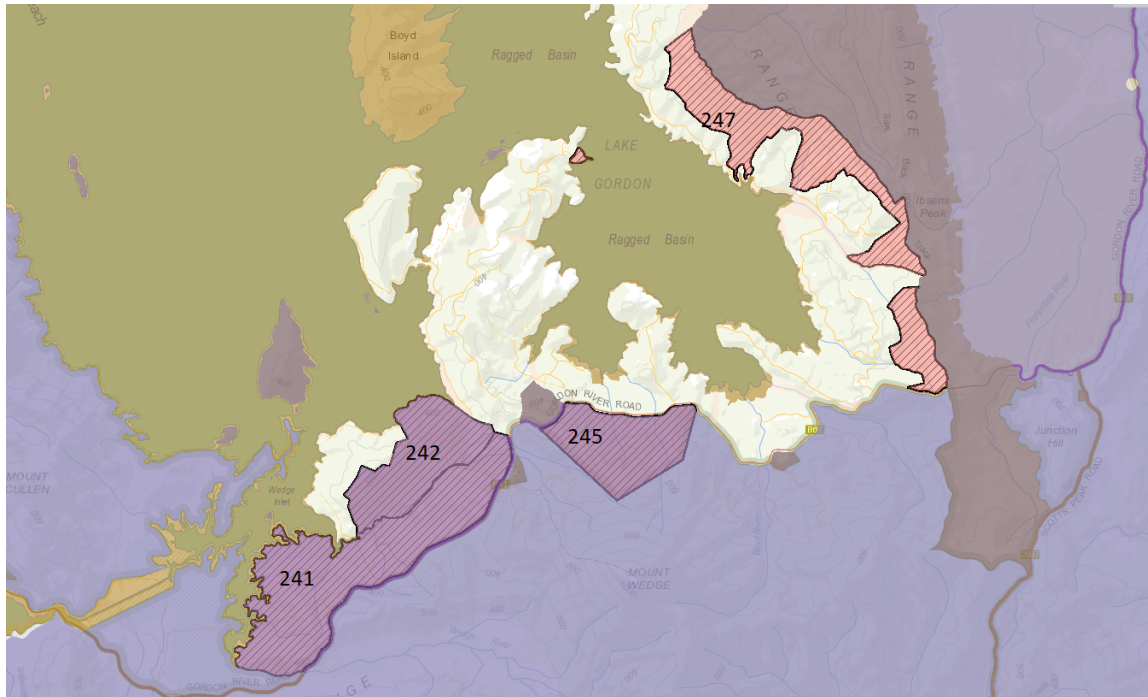
Parks and Wildlife Service, 2004: *Mole Creek Karst National Park and Conservation Area Management Plan 2004*. Parks and Wildlife Service, Department of Tourism, Parks, Heritage and the Arts, Hobart.



World Heritage cave at Mole Creek, partly in Conservation Area, partly in National Park.
photo: Deb Hunter

Recommendation D: South-West NP additions

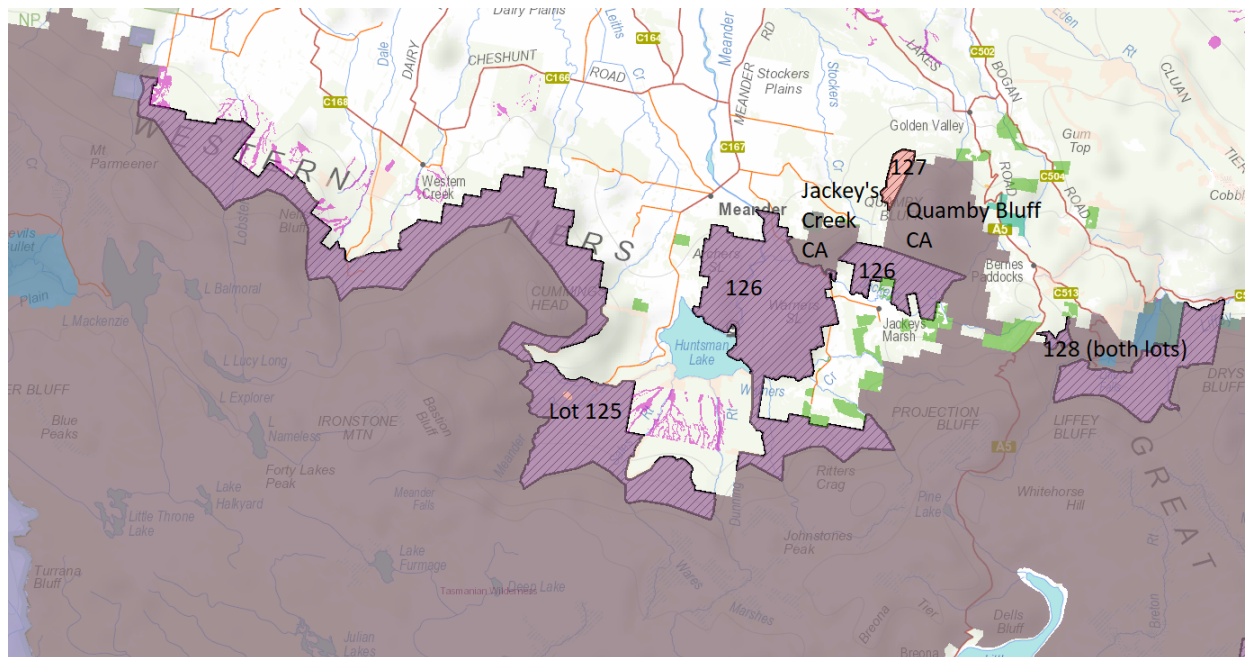
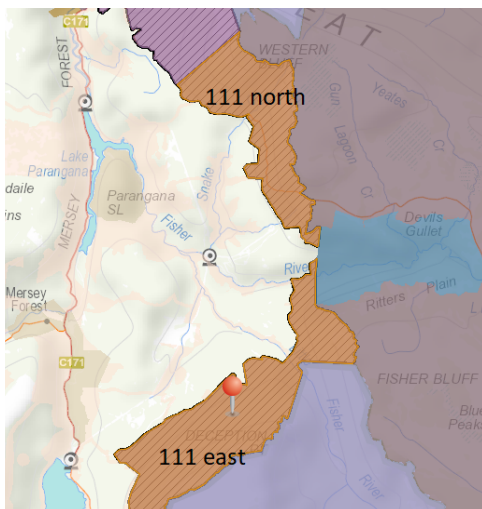
Lots 241, 242 and 245 are added to South-West National Park.



Recommendation E: Creation of Kooparoona Niara (Great Western Tiers) National Park

Propose Lots 125, 126, 128, 129 (and 127 - not currently on Govt's reservation list), 111 north, plus Devils Gullet SR, Great Western Tiers CA as far west as the Mole Creek Karst NP, Meander CA, Quamby Bluff CA, Jackeys Creek CA, Liffey Falls SR, Liffey CA, Drys Bluff CA, Great Lake CA, FPPF south of Millers Bluff, and parts of the Central Plateau CA be added to Kooparoona Niara (Great Western Tiers) National Park.

Lots 111, 125, 126, 127 and 128 are illustrated in the following maps. Lot 129 extends from the northern shores of yingina/Great Lake and Arthurs Lake to the northern escarpment.



The whole Kooparoona Niara (Great Western Tiers) National Park is described and mapped in more detail below:

The ecological and recreational basis for Kooparoona Niara (Great Western Tiers) National Park

The National Park would comprise the reserved parts of the forested escarpment (including FPPF) from Nells Bluff, potentially extending as far along the escarpment to the south east as Mt Franklin near Lake Sorrell. It would also include parts of the adjoining northern Central Plateau as far south as Devils Gullet, Forty Lakes Peak, Wild Dog Tier, Pine Lake, the northern shore of yingina/Great Lake, the northern shore of Arthurs Lake and the high country south of Millers Bluff as far as the northern shore of Lake Sorell (see Map below). The proposed Kooparoona Niara (Great Western Tiers) National Park adjoins the proposed extended Mole Creek Karst National Park along the top of the escarpment between Nells Bluff and Western Bluff.

The area proposed is largely World Heritage listed. The total area could be in excess of 100,000 hectares.

The Park would include Devils Gullet SR, Great Western Tiers CA as far west as the Mole Creek Karst NP, Meander CA, Quamby Bluff CA, Jackeys Creek CA, Liffey Falls SR, Liffey CA, Drys Bluff CA, Great Lake CA, FPPF south of Millers Bluff, and parts of the Central Plateau CA.

Eventually the remaining Central Plateau CA between this park and Walls of Jerusalem NP should be included in either park.

Ecological Values of the Area

The escarpment is the most prominent and accessible natural feature of northern Tasmania, comprising forested slopes, sandstone cliffs, spectacular dolerite cliffs and boulder fields, deeply incised gorges and a multitude of streams, waterfalls, springs and swamps. The escarpment dominates the landscape, being visible from an area of at least a quarter of a million hectares.

Of importance are the visual beauty, steep climatic gradients, low to high altitude vegetation sequences, relationship between the escarpment and the Central Plateau, and the diversity of flora, fauna, topography, aspect and geology.

Extensive old-growth forests on the slopes and flatter areas (benches) of the escarpment are very important as native animal habitat. Suitable habitat is present for all Tasmanian native mammals. The benches are important intermediate altitude refuges for plant and animal species which migrate, over thousands of years, up or down the escarpment due to climate change. The perched swamps are each a unique experiment in ecosystem development and are likely to contain valuable fossil records in the deep mud.

The vegetation of the escarpment and plateau includes many communities of wet eucalypt forest, dry eucalypt forest, rainforest, subalpine forest, shrublands, sphagnum peatlands, sandstone cliff communities, wetlands and montane grassland. The dry eucalypt communities have very high value, because of the poor reservation of this type in the region.

Beautiful stands of King Billy Pine and Pencil Pine are found in the gorges and other sites sheltered from fire. These stands represent the eastern limit of these species and are of very high conservation value.

The Central Plateau contains the largest contiguous area of treeless high country in Australia. Levels of endemism are very high. The northern plateau is well endowed with Lakes and Tarns. These are home to a significant vertebrate and invertebrate fauna. Significant wilderness exists

within the park around Mt Ironstone, the Wild Dog Tier and south of Millers Bluff.

The escarpment is systemically related to the Central Plateau, both biologically and geologically. There is a strong public identification of the northern plateau with Kooparoona Niara-Great Western Tiers, and day walks up the escarpment onto the plateau are popular.

There are numerous named and well used walking tracks. For rational management of visitor access, it is logical for the National Park boundary to encompass those parts of the plateau which are readily accessed by day walks up the escarpment. It is also logical that the whole upper catchments of the streams which flow down the escarpment be included in the park. Thus, the upper catchments of Lobster Rivulet, the Dalebrook, Western Creek, Meander River, Liffey River, Brumbys Creek and Westons Rivulet are included in the park.

The Central Plateau terrain is of outstanding geological and geomorphological significance. While the National Park does not contain all the terrain it contains extensive areas of both the erosional and depositional glaciated landscape, a legacy of the past glaciations, as well as areas subjected to periglacial processes. This glacial legacy, particularly the lakes and tarns in the southwest of the National Park, was one of the major reasons for the World Heritage listing of the Central Plateau. The Plateau and escarpment edge have been identified as containing a number of individual earth science features of conservation significance eg the slab topples near Nells Bluff, Lake Explorer, Lake Nameless patterned ground, block glacis at Pine Lake and the ice spillover area associated with Lobster Rivulet.

Recreational Values - Day Walk Tracks

The National Park area contains many valuable walking tracks and opportunities for untracked exploration. The tracks lead through the various vegetation types and often on to the plateau, offering superb daywalking experiences. The higher portions of many of these tracks offer outstanding views out over the plains to distant mountains and ocean, along the Tiers, down over the forested slopes and out to the dolerite cliffs, boulder fields and subalpine and alpine forest, scrub and heath. Many offer intimate experiences of mountain streams, streamside riparian vegetation and native conifers. Each track has its own special features.

- The **Western Bluff Track** leads from Urks Loop to the summit of Western Bluff from where spectacular views can be obtained.
- **Devils Pot/Devils Earhole Track** in the Marakoopa Cave State Reserve is a recently opened, restricted access walk up to some deep sinkholes.
- The **South Mole Creek Track** was used by the HEC for access to Lake Mackenzie.
- **Fern Glade Track** is a short nature trail leading from the Marakoopa Cave ticket office along Marakoopa Creek to the cave entrance.
- **Parsons Track** leads via two distinct benches to a particularly beautiful small wet valley on the Plateau which gives a spectacular display of *Richea scoparia* in season. The track has two well kept huts. The upper hut (Haberles Hut) is an old trapper's hut of unusual design which has been renovated. An alternate route from the lower hut (Hills Hut) to the Plateau traverses a bench below the Plateau which has a spectacular Waratah display in season.
- **Sentinel Rock Track/Charlie's Loop** is an alternate route down from Haberles Hut which connects with Parsons Track. It follows a gorge through interesting Sphagnum and King Billy Pine.
- **Westmorland Falls Track** is one of the most beautiful short rainforest walks available anywhere, boasting a fern-fringed waterfall and fossils in the creek bed.
- **Higgs Track** climbs the side of Nells Bluff through rainforest and provides the most direct and well known access to the main alpine lakes in this region (Chudleigh Lakes). The track features Scottish stone pitching techniques.
- The **Western Creek Track** leads through the deeply incised "Western Gorge" with stands of native conifers, providing a direct route to Lake Ironstone via Whitelys Hut.

- **Syds Track** climbs to the Plateau through the "Little Gorge" with a lovely area of Dwarf Myrtle and King Billy Pine forest and provides a direct route to Mt Ironstone.
- The **Mother Cummings Peak Track** climbs from Westrope Road to a valley on the Plateau which connects readily to Smoko Falls Track. It also provides the best access to Mother Cummings Peak (northern peak). **Scotts Track** leads from the end of Scotts Road up the eastern side of Mother Cummings Summit (southern peak).
- **Mother Cummings Rivulet Track** provides access to Mother Cummings from the south via a sheltered rainforest gorge which is well known for its King Billy Pine. The track passes several picturesque cascades and waterfalls along the rivulet including Smoko Falls.
- The **Smoko Creek Track** leads past Chasm and Shute Falls to the Mt Ironstone trig point.
- **Stumps Track** is a steep old trappers track which leads off Smoko Creek Track to the Plateau through a "bearded" Myrtle forest. It also provides access to a coal seam under Bastion Bluff.
- The **Dell Track** leads off Smoko Creek Track through King Billy Pine and Sphagnum forest up onto Bastion Bluff via some small tarns.
- **Stone Hut Track** leads past an old trappers shelter to Bastion Bluff and connects with Bastion Cascades and the Croft Track.
- The **Bastion Cascades Track** and **Croft Track** feature rainforest, beautiful sandstone cliffs, 'wave rock' and spectacular waterfalls.
- The **Split Rock Track** leads from the Apex Hut to Meander Falls via a subalpine plateau below Bastion Bluff. The Shower Cave Falls and the Split Rock Falls are accessible from this track. A side track leads up to Lake Meander through a mossy alpine valley below the lake.
- The **Meander Falls Track** follows the Meander River through rainforest and is the best known walk in this area. There are a number of Pencil and King Billy Pines growing along the track closer to the falls.
- **Dixons Track** leads from the Meander Falls Track and follows Staggs Creek to the Plateau.
- **Staggs Track** (Sales Lake Track) leads from the top end of Bessells Road and follows an old trappers track through spectacular dwarf Myrtle forest. It comes onto the Plateau at Sales Lake and provides quick access to Wild Dog Tier.
- **Johnsons Track** also leads from the top end of Bessells Road to the Plateau. It is an old stock route.
- **Old Powerline Track** provides quick access to Johnsons Crag. It features stonework hand laid by the transmission line builders.
- **Warners Track** follows the old Lake Highway. It features old Native Pine bridges and spectacular hand laid stonework, and leads past Adams Peak to Pine Lake.
- **Fairy Glade and Quamby Bluff Track** leads from the Lake Highway to the summit of Quamby Bluff through very old Myrtle forest in the upper portions. It provides easier walking than the northern track which leads from Walking Track Road in Golden Valley.
- **South Quamby Track** connects Jackeys Marsh with the summit of Quamby Bluff. This track leads through mixed forest containing some very large Eucalypts.
- The **Liffey River Track** connects the Liffey Falls picnic area with the viewing spot on the Lake Highway just below the edge of the Plateau. It follows the Liffey River all the way, including beautiful pools good for swimming.
- The **Liffey Bluff Track** starts near the bottom of the Liffey River Track and provides a good long climb to the Plateau.
- The **Liffey Falls** tracks are very popular. There are two tracks to the falls; the Upper Track is shorter and more popular and features stands of large tree ferns alongside the track, while the track from the Lower Campground is longer as it follows the River up to the falls.
- Also accessed from the Lower Liffey Campground, **Liffey River Reserve** winds through mixed forest past the Liffey River with a striking section of white gums towards the end. Includes interpretive signage.
- The **Drys Bluff Track** is a very long and steep climb to the top of the Bluff from where the views are spectacular. Track features several massive rock formations with rope ascents and a variety of forest types.
- The **Blackwood Creek Track** leads from the end of Blackwood Creek Road to the Plateau, past some sandstone cliff overhangs.
- The **Bradys Lookout Track** ascends to the Plateau from the Poatina Highway.

- The **Projection Bluff Track** ascends through dwarf myrtle forest from the Lake Highway to the top of the bluff and has magnificent views of the Great Lake, Meander Valley and the Tiers.

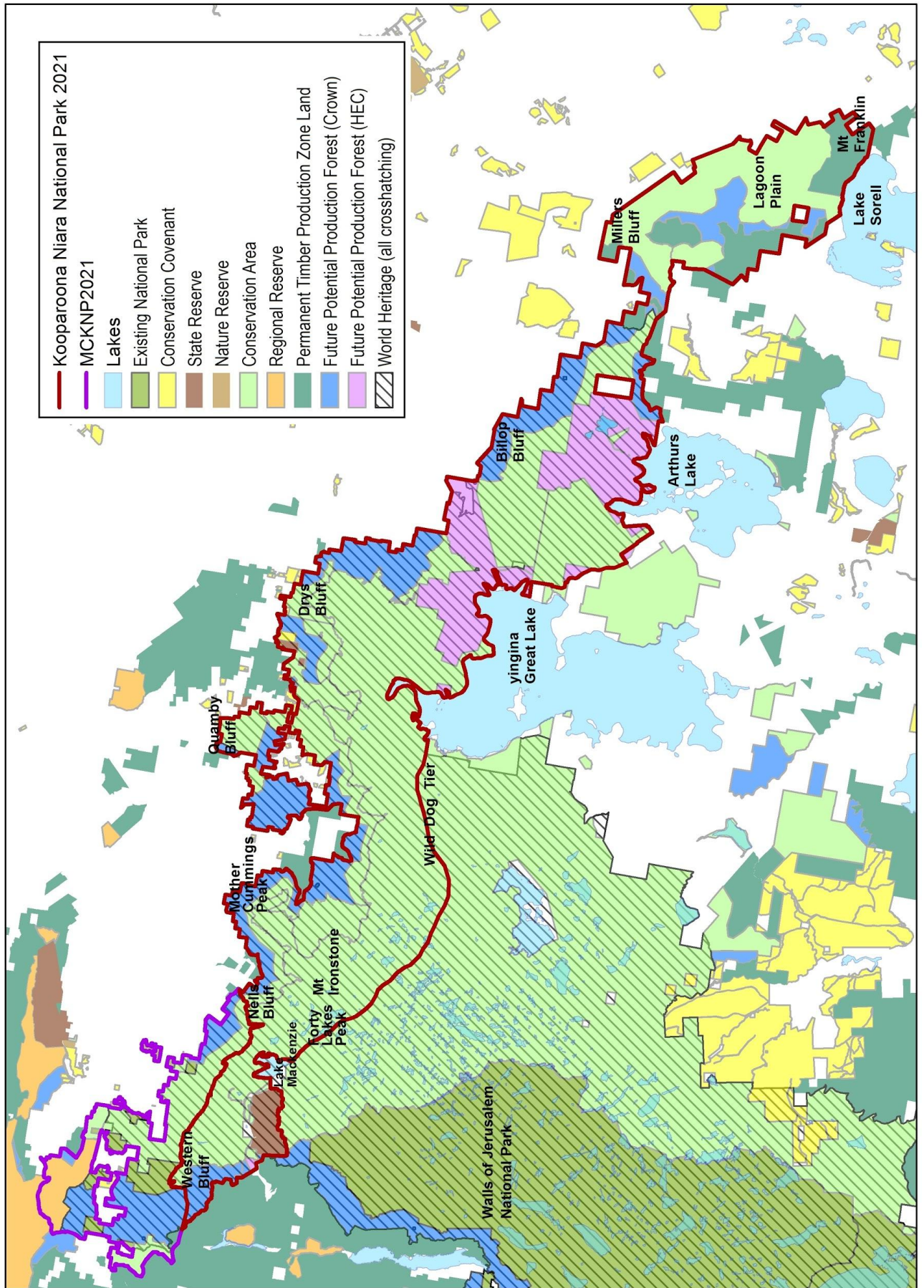
Map of proposed Kooparoona Niara (Great Western Tiers) National Park (below)

The World Heritage Area is shown in crosshatching and runs across various tenures. The proposed boundary of the new National Park is shown as a red line. The FPPF zones are shown as darker blue areas. Those darker blue areas that are crosshatched are FPPF in the World Heritage Area.

The park includes the parts of the World Heritage Area on the Great Western Tiers escarpment and the adjoining northern Central Plateau as far south as Devils Gullet, Forty Lakes Peak, Wild Dog Tier, the northern shores of yingina/Great Lake, Arthurs Lake and Lake Sorell .

The areas between Millers Bluff and Mt Franklin/Lake Sorell, may also be included in the Park, although they are not World Heritage.

The boundaries of Kooparoona Niara (Great Western Tiers) National Park meet the boundaries of Mole Creek Karst National Park in the west, primarily along the top edge of the escarpment. There are some contentious bits of Permanent Timber Production Zone on Millers Bluff. The Hydro WH FPPFL on the plateau is also included.



Appendix

Conservation Areas and Regional Reserves Allow Logging and Mining

The Tasmanian reserve and land classification system comprise a combination of State Land tenure Classification (eg Conservation Area, National Park) as well as overlying prescriptions from other considerations such as World Heritage status and IUCN Categories. As shown in Table 1, the Central Plateau Conservation Area and the Great Western Tiers Conservation Area, most of which are in World Heritage, are assigned the lowest possible IUCN category VI, which allows logging and mining. While this is consistent with the Conservation Area classification, which also allows logging and mining, it is not consistent with World Heritage status.

The TWWHA Management Plan Section 10.2.5.2 states that in WH FPPF land mineral exploration and extraction, and logging (special species timber) will not be permitted. However, this promise is not reflected in the assigned tenures of Conservation Area or Regional Reserve. National Park status is required.

The IUCN categories are given below Table 1 and the Tasmanian Nature Conservation Act reserved land classes are shown in Table 2.

Table 1: Status of Reserves on Kooparoona Niara (Great Western Tiers)

Source: LIST, Tasmanian Reserve Estate Spatial Layer, Retrieved March 2021

	IUCN	WH	Mining	Mining explained
Central Plateau Conservation Area	VI	y	y	Available under the Mineral Resources Development Act (MRDA) but partially not available under administrative arrangements
Great Western Tiers Conservation Area	VI	y	y	Available under the MRDA but partially not available under administrative arrangements
Dogs Head Hill RR	IV	n	y	Available under the MRDA
Mersey River CA	IV	part	y	Available under the MRDA but partially not available under administrative arrangements
Devils Gullet SR	II	y	n	Not available under the MRDA
Mole Creek Karst NP	II	part	n	Not available under the MRDA
Sensation Gorge CA	VI	n	y	Available under the MRDA
Meander CA	II	y	y	Available under the MRDA but partially not available under administrative arrangements

Jackeys Creek CA	IV	y	y	Available under the MRDA but not available under administrative arrangements
Quamby Bluff CA	IV	y	y	Available under the MRDA but not available under administrative arrangements
Liffey Falls SR	II	y	n	Not available under the MRDA
Liffey CA	II	y	y	Available under the MRDA but not available under administrative arrangements
Drys Bluff CA	II	y	y	Available under the MRDA but not available under administrative arrangements
Great Lake CA	V	y	y	Available under the MRDA but partially not available under administrative arrangements
Millers Bluff CA	IV	n	y	Available under the MRDA

IUCN Categories:

<https://www.iucn.org/theme/protected-areas/about/protected-area-categories> Retrieved March 2021

Ia Strict Nature Reserve: Category Ia are strictly protected areas set aside to protect biodiversity and also possibly geological/geomorphic features, where human visitation, use and impacts are strictly controlled and limited to ensure protection of the conservation values. Such protected areas can serve as indispensable reference areas for scientific research and monitoring.

Ib Wilderness Area: Category Ib protected areas are usually large unmodified or slightly modified areas, retaining their natural character and influence without permanent or significant human habitation, which are protected and managed so as to preserve their natural condition.

II National Park: Category II protected areas are large natural or near natural areas set aside to protect large-scale ecological processes, along with the complement of species and ecosystems characteristic of the area, which also provide a foundation for environmentally and culturally compatible, spiritual, scientific, educational, recreational, and visitor opportunities.

III Natural Monument or Feature: Category III protected areas are set aside to protect a specific natural monument, which can be a landform, sea mount, submarine cavern, geological feature such as a cave or even a living feature such as an ancient grove. They are generally quite small protected areas and often have high visitor value.

IV Habitat/Species Management Area: Category IV protected areas aim to protect particular species or habitats and management reflects this priority. Many Category IV protected areas will need regular, active interventions to address the requirements of particular species or to maintain habitats, but this is not a requirement of the category.

V Protected Landscape/ Seascape: A protected area where the interaction of people and nature over time has produced an area of distinct character with significant, ecological, biological, cultural and scenic value: and where safeguarding the integrity of this interaction is vital to protecting and sustaining the area and its associated nature conservation and other values.

VI Protected area with sustainable use of natural resources: Category VI protected areas conserve ecosystems and habitats together with associated cultural values and traditional natural resource management systems. They are generally large, with most of the area in a natural condition, where a proportion is under sustainable natural resource management and where low-level non-industrial use of natural resources compatible with nature conservation is seen as one of the main aims of the area.

Nature Conservation Act categories

Table 2: Tasmanian Nature Conservation Act 2002, Version current from 30 November 2020 to date (accessed 22 March 2021 at 21:25)

Class of reserved land	Values of land	Purposes of reservation
National park	A large natural area of land containing a representative or outstanding sample of major natural regions, features or scenery.	The protection and maintenance of the natural and cultural values of the area of land while providing for ecologically sustainable recreation consistent with conserving those values.
State reserve	An area of land containing any of the following: (a) significant natural landscapes; (b) natural features; (c) sites, objects or places of significance to Aboriginal people.	The protection and maintenance of any one or more of the following: (a) the natural and cultural values of the area of land; (b) sites, objects or places of significance to Aboriginal people contained in that area of land; (c) use of the area of land by Aboriginal people – while providing for ecologically sustainable recreation consistent with conserving any of the things referred to in paragraphs (a), (b) and (c), as applicable.
Nature reserve	An area of land that contains natural values that – (a) contribute to the natural biological diversity or geological diversity of the area of land, or both; and (b) are unique, important or have representative value.	The conservation of the natural biological diversity or geological diversity of the area of land, or both, and the conservation of the natural values of that area of land that are unique, important or have representative value.

Game reserve	An area of land containing natural values that are unique, important or have representative value particularly with respect to game species.	The conservation of the natural values of the area of land that are unique, important or have representative value, the conservation of the natural biological diversity or geological diversity of that area of land, or both, and the ecologically sustainable hunting of game species in that area of land.
Conservation area	An area of land predominantly in a natural state.	The protection and maintenance of the natural and cultural values of the area of land and the sustainable use of the natural resources of that area of land including special species timber harvesting
Nature recreation area	An area of land – (a) predominantly in a natural state; or (b) containing sensitive natural sites of significance for recreation.	Public recreation and education consistent with conserving the natural and cultural values of the area of land.
Regional reserve	An area of land – (a) with high mineral potential or prospectivity; and (b) predominantly in a natural state.	Mineral exploration and the development of mineral deposits in the area of land, and the controlled use of other natural resources of that area of land, including special species timber harvesting, while protecting and maintaining the natural and cultural values of that area of land.

The management objectives for conservation areas include:

- (e) to provide for the controlled use of natural resources including special species timber harvesting, and including as an adjunct to utilisation of marine resources;
- (f) to provide for exploration activities and utilisation of mineral resources;
- (g) to provide for the taking, on an ecologically sustainable basis, of designated game species for commercial or private purposes, or both...

The objectives for regional reserves areas include:

- (a) to provide for mineral exploration activities and utilisation of mineral resources;
- (b) to provide for the controlled use of other natural resources including special species timber harvesting...

Mackey et al emphasise that the current reserve class definitions allow logging and mining in Conservation Areas: “Since the [Tasmanian Regional Forest Agreement] RFA was signed, there have been significant changes made to the reserve classes in Tasmania. In particular, additional rainforest reserves were declared in 2005 and amendments made to State legislation during 2013–2014. Schedule 1 of the State Nature Conservation Act (Government of Tasmania, 2014) was amended to redefine the purpose of the two

large reserve classes of 'Conservation Areas' and 'Regional Reserves'. Conservation Areas were defined as having the purpose of:

'The protection and maintenance of the natural and cultural values of the area of land and the sustainable use of the natural resources of that area of land including special species timber harvesting'.

The purpose of Regional Reserves was defined as:

'Mineral exploration and the development of mineral deposits in the area of land, and the controlled use of other natural resources of that area of land, including special species timber harvesting, while protecting and maintaining the natural and cultural values of that area of land'.

Both revised definitions therefore include mineral exploration, mining and commercial logging as permissible land use activities. Furthermore, the reserve status of certain rainforest areas was altered by changing their reserve category to one that now permits mining or logging."

Brendan Mackey, Sean Cadman, Nicole Rogers, Sonia Hugh, [Assessing the risk to the conservation status of temperate rainforest from exposure to mining, commercial logging, and climate change: A Tasmanian case study](#), Biological Conservation 215 (2017) 19-29

Cadman further emphasises these concerns: "Recently, Tasmanian legislation has been amended to explicitly allow logging in many reserves, additionally some reserves with the highest nature conservation designations have been downgraded to allow logging and mining. The Australian government is misrepresenting the status of these reserves in its reporting obligations under the United Nations Convention on Biodiversity."

Sean T. Cadman, Tasmanian Temperate Rainforests, Reference Module in Earth Systems and Environmental Sciences (2020)

Many of the IUCN categorisations assigned to individual reserves are no longer fit for purpose.

"Within each classification of reserve there may be a variation of [IUCN categories](#) Australia is a signatory to the Convention of Biological Diversity and as such has obligations to report the status of its National Reserve System. IUCN provides on its website a prescription for activities consistent with the categorisation system. Changes made to the Nature Conservation Act 2002 in 2014 permit timber harvesting. These changes made in addition to the already established right to access minerals means that many of the IUCN categorisations assigned to individual reserves in Tasmania are no longer fit for purpose. In addition many reserves have had their reserve status downgraded from a class excluding timber harvesting and mineral extraction to ones where these activities are now permitted. This mis-application of the IUCN protected area categories needs to be remedied or the reserves protected land class under the Nature Conservation Act 2002 should be adjusted to reflect its currently assigned IUCN category."

https://en.wikipedia.org/wiki/Protected_areas_of_Tasmania, accessed 23rd March 2021, author unknown

In fact, both the assigned IUCN category and the reservation status need to be upgraded.

Bee keeping is allowed on parcels of land in the TWWHA zoned as recreational. All roads within the TWWHA are zoned recreational and this zone extends 50 metres either side of the centre line.