



Why the Australian proposal for de-listing parts of the Tasmanian Wilderness World Heritage Area should be rejected

The 38th Session of the World Heritage Committee is being asked to approve the Australian Government proposal to de-list part of the Tasmanian Wilderness World Heritage Area.

The proposal is to de-list 74 000 ha of the area, mainly forest, to allow commercial logging.

The submission is misleading and seriously misrepresents the facts of the proposal.

ALERT 1

Proposed de-listing is NOT a 'minor modification of the boundary'

The Australian Government has submitted a proposal to de-list 74 000 ha of this World Heritage Area, claiming it involves only a 'minor modification to the boundary'. However, the proposal would **seriously 'affect the Outstanding Universal Value' (OUV) of the area.**

The proposal therefore does NOT qualify as a 'minor modification to the boundaries' under Para 163* Operational Guidelines and so should not be on the agenda for the 38th Session of the World Heritage Committee. On this ground alone the request should be dismissed.

*Para 163. 'A minor modification is one which has not a significant impact on the extent of the property nor affects its Outstanding Universal Value.' Operational. Guidelines 2013



ALERT 2

The Australian submission is misleading

The WHC should **reject** the Australian Government request because:

It involves excising critical features and attributes that are important to the integrity of the WH Area. This would have a serious detrimental impact on the integrity of the Area's OUV. Important attributes that would be adversely impacted include:

- pristine tall eucalypt forest
- caves and karst
- glacial features
- habitat of threatened species and communities
- outstanding scenic beauty, and
- more than 24 Aboriginal cultural areas, including a Pleistocene (ice age) archaeological area.

ALERT 3

Main benefit of extension would be lost

The 2013 additions to the World Heritage Area approved by the WH Committee in 2013 focused on protecting a select tract of tall eucalypt forest ecosystem. When combined with then already protected stands of tall eucalypt forest, this provided an integrated approach to protecting a single corridor of tall eucalypt forest ecosystem extending as a generally continuous band along the eastern margin of the WHA.

The integrated whole of the tall eucalypt forests represents an ecologically connected single corridor of tall eucalypt forest ecosystem – a regional scale (circa 180 km) ecological connectivity corridor extending from sea level in the south to over 1 000 m asl in the north and extending through the three main species groupings, *Eucalyptus obliqua*, *E.regnans* and *E.delegatensis*.

The proposed de-listings would completely fragment this continuum of tall eucalypt forest and destroy the ecological connectivity achieved in 2013. **This would degrade the integrity of the tall eucalypt forest OUV.**

ALERT 4

The Australian Government's claim is false

The Australian Government's claim that the excision would improve the WH Area's integrity by removing areas of disturbance is false. The justification used for de-listing in the Australian Government submission is that:

'The proposed minor boundary modification seeks to remove a number of areas in the extension approved by the Committee in June 2013 that contain pine and eucalypt plantations and previously logged forest.'

The facts are as follows:

- 90% of the area proposed for de-listing is in excellent condition, with most of the forests and other natural areas in pristine condition.
- Only 80 sq m (1/3 size of a tennis court!) is a pine plantation and may reflect a tiny technical mapping error.
- Eight hectares of eucalypt plantations (just 0.00011% or nine soccer fields) are included in the proposed excision.
- The 2013 nomination approved by the WH Committee drew attention to the fact that some areas of previously logged forest were included in the proposed extension. Detailed analysis of the 2013 extension reveals the extent and nature of harvesting post 1960 (the period for which good records exist). Less than 10% of the total extension has some level of logging disturbance, with areas of previously logged forest in various stages of regeneration. Of the area proposed for de-listing, about 7,300 ha or around 9.9 % (approximately the same proportion as in the 2013 additions proposed to be retained) has been harvested since 1960. Of this 9.9%, approximately 4% could be considered 'heavily disturbed' (e.g. recently harvested).
- Areas of disturbance are predominantly embedded in intact forests. The government committed to put in place management arrangements to facilitate ecological recovery for the small percentage that is heavily disturbed or modified.

ALERT 5

Serious implications for the Convention and work of the WH Committee

Agreeing to Australia's request would create a global precedent for de-listing for commercial exploitation. This could seriously erode the World Heritage Committee's credibility.

There would be nothing to stop other State Parties to the Convention seeking de-listing of a property (or part) for purely political reasons.

Another precedent would be set if removal of an area that still has World Heritage Values occurred without first going through the established step of putting the WH Area on the World Heritage List in Danger.

The universal acceptance of the Convention would be diminished if State Parties were allowed to circumvent their obligations under Articles 4 and 5 of the Convention.

Australia should be protecting the Tasmanian Wilderness World Heritage Area rather than seeking its partial de-listing.

This brochure provides you with the otherwise undisclosed facts and recommends a vote against the official Australian resolution.

WHO ARE WE?

We are an independent group of conservation scientists and practitioners with extensive knowledge of World Heritage principles and experience with the Tasmanian Wilderness World Heritage Area on the island of Tasmania, Australia.

We are greatly concerned that the official submission from the Australian Government seriously misrepresents the facts of the proposed de-listing.



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The issue in brief

The Australian Government has a submission before the 38th Session of the World Heritage Committee – officially described as a *‘Proposal for the minor modification to the boundary of the Tasmanian Wilderness World Heritage Area (Australia) Property ID 181 quinquies.’*

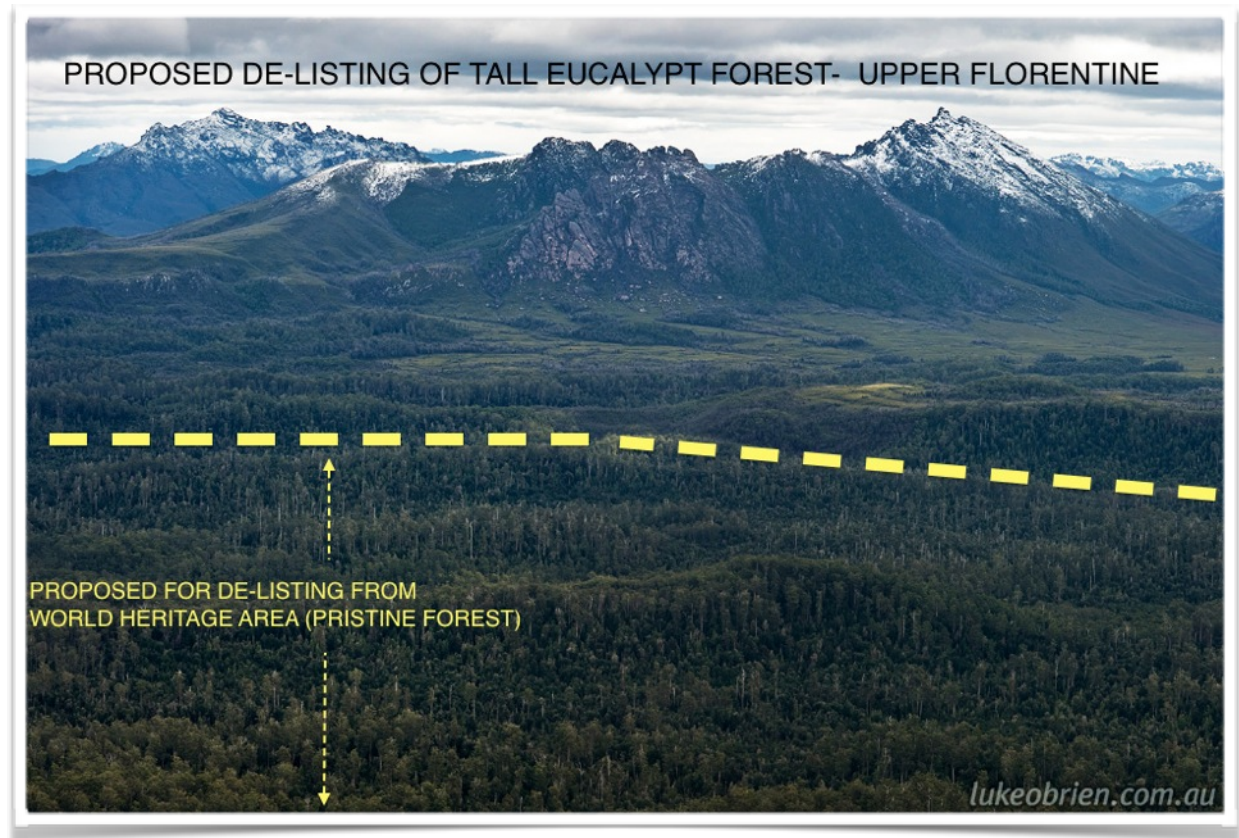
The Australian submission is **seriously misleading because it misrepresents the overall condition of the 74 000 hectares proposed for excision, fails to acknowledge the OUV of the areas and fails to reveal the substantial impact on the integrity of the OUV of the World Heritage Area** of de-listing and opening up these areas to commercial logging activities.

The claim that the excision involves a minor boundary modification is an attempt to disguise the primary motivation (commercial timber harvesting) and to avoid any analysis of the critically important contribution the forests and other natural lands within the 74 000 have made to the integrity of the Tasmanian Wilderness World Heritage Area.

The primary motivation is to allow timber harvesting in forests found to be of Outstanding Universal Value.

Strong evidence exists that the proposed de-listing is purely political in nature, retro-fitted to suit a pre-election party political commitment. In September 2013, just prior to an Australian Government election, the Coalition of the Liberal and National Parties released an 'Economic growth plan for Tasmania' that incorporated a statement in the forest industry section regarding the 2013 additions to the World Heritage Area, namely to '...seek to have it removed', with the clear intention of accessing the forest resources for commercial exploitation.

There is now an Australian Senate Inquiry into the Tasmanian Wilderness World Heritage Area with a particular focus on the impacts of the proposed excision on the OUV and integrity of the area and the motivation for seeking the excision. The full Senate report will be available prior to the WH Committee meeting in June.



Australian Government submission – an expose

The claims made in the Australian Government submission to the World Heritage Committee to justify **de-listing** part of the Tasmanian Wilderness World Heritage Area have been examined and found to be misleading and, from a World Heritage viewpoint, lacking in credibility.

1. What the Australian submission says

Australia has based its request to the WHC on the claim that the area is too disturbed to warrant WH listing. Speaking at a recent dinner organised by two forestry and timber industry bodies, Prime Minister Tony Abbott said: "One of the first acts of the incoming Government was to begin the process to try to get out of world heritage listing 74,000 hectares of country in Tasmania, because that 74,000 hectares is not pristine forest. It's forest which has been logged, it's forest which has been degraded, in some cases, it's plantation timber that was actually planted to be logged."

What about the other 90% not referred to in the 'justification'?

Credibility test result: The claimed justification, based on disturbance*, applies to only about 10% of the area proposed for de-listing.

Conversely, 90% of the area proposed for de-listing is in excellent condition and includes extensive areas of unlogged, mostly pristine forest and other natural vegetation.

As will be demonstrated below, the forest component makes a very important contribution to the Integrity of the Outstanding Universal Values of the WHA.

- The inclusion of some areas of disturbance was acknowledged in the 2013 additions, inclusion being necessary to achieve long-term ecological integrity, especially in the tall eucalypt forest ecosystem.
- Most areas of recent logging are embedded in more extensive tracts of unlogged forest and will be managed to foster long-term ecological recovery, thus improving the overall integrity of the Area.

Boundary Integrity:

Further, the Australian submission claims that:

‘In selecting areas for excision, consideration was given to retaining the overall coherence of the boundary...’

This claim is patently false. It can be readily demonstrated that overall, the resultant boundary from the proposed de-listing would be a serious retrograde step and impose highly inappropriate boundaries, seriously degrading the boundary integrity of the existing WHA.

2. What the Australian submission fails to reveal

The Australian Government submission fails to acknowledge the important heritage values that would be sacrificed in the proposed de-listing. Following is a summary of attributes in the areas proposed for de-listing and the nature of the impact of de-listing.

Summary of attributes

1. Tall Eucalypt Forests

- Loss of ecological diversity (currently sea level to 1000 m asl)
- Loss of connectivity (loss of regional scale connectivity)
- Loss of outstanding natural beauty (e.g. grand tall eucalypt forest, scenic escarpments, wild river, rainforest)

2. Rainforests

- Loss of ecological diversity

3. Threatened species and communities: (plant and animal)

- Loss of Plant communities (various, incl. long-lived conifers)
- Loss of habitat of threatened animal species e.g. Clarence galaxid fish

4. Karst and caves

- Loss of geodiversity and hydrological integrity.

5. Scenic landscapes (areas of 'outstanding natural beauty')

- Loss or truncation of scenic landscapes
- Loss or truncation of Tall eucalypt rainforest - natural beauty
- Loss of Wild River conditions

6. Geological areas

- Loss of Ordovician fossil area

7. Glacial areas

- Truncation of glacial features - e.g. leaving two glacial precincts, partly-in and partly-out of the WHA. (e.g. St. Clair piedmont glacier outlets and Broad River glacier basin) #

8. Aboriginal cultural heritage areas

- Loss of at least 24 registered Aboriginal cultural areas (including one of only two Pleistocene archaeological areas on eastern side of area)

A more detailed analysis of the impacts of de-listing on non forest World Heritage Values is provided in the 3 March, 2014 submission to the Australian Senate Inquiry into the proposed de-listing by Dr Kevin Kiernan, eminent Australian specialist in glaciology and a specialist in karst. For example, in relation to the Navarre Plains, one of a number of glacial precincts that would be impacted by the proposed delisting:

"... the proposed revocation of the Navarre Plains from the WHA directly targets a site with very clear demonstrable world heritage values from a geomorphological perspective. From the fact that revocation is proposed I can only presume that officials or politicians responsible for proposing revocation of this area either haven't properly investigated the World Heritage values involved, haven't had sufficient expertise to recognise those values, or simply don't care. Revocation of this area is completely unacceptable".

http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Tasmanian_Wilderness_World_Heritage_Area/Submissions See Submission No.6



Map 1. Tasmanian Wilderness World Heritage Area Existing and Proposed Boundary

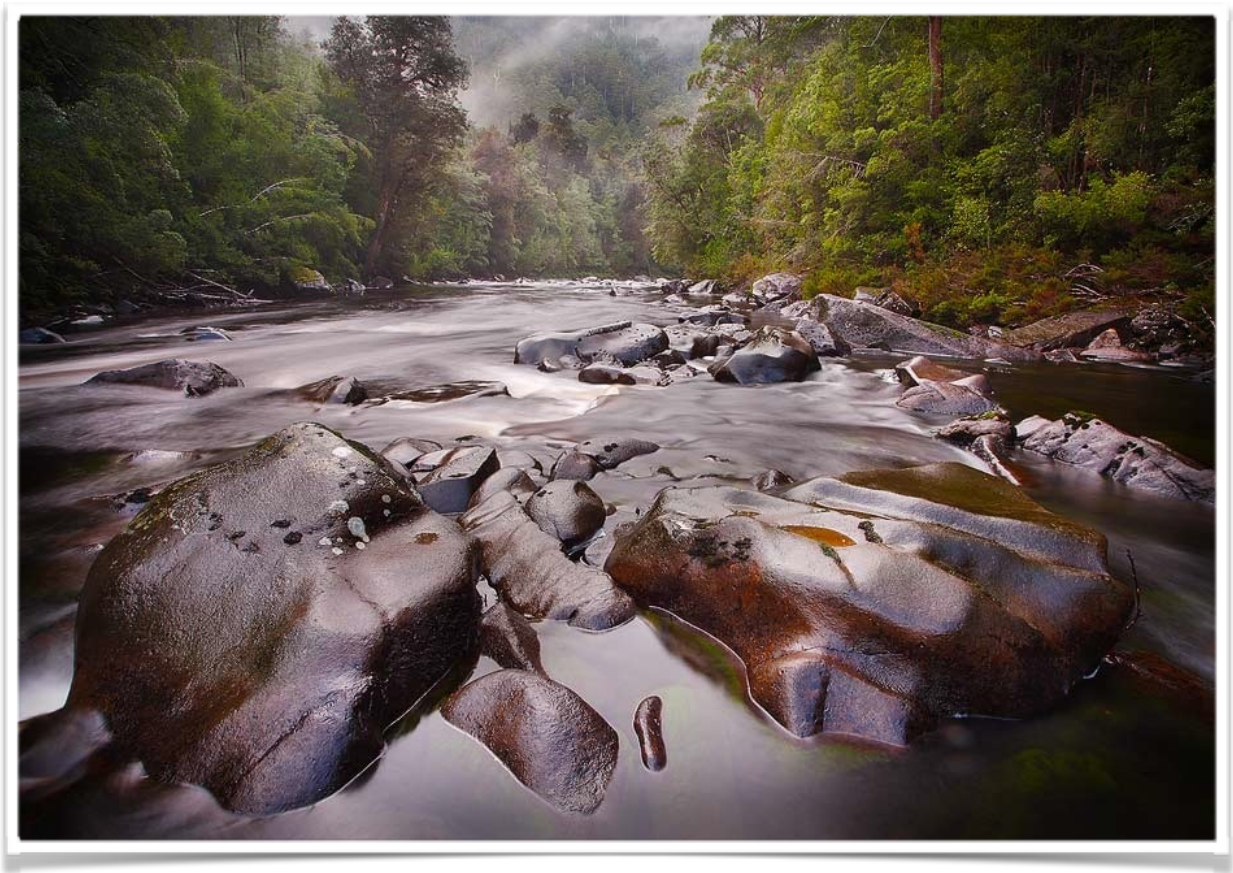
- World Heritage Area (Existing areas to be removed)
- World Heritage Area Boundary (Proposed)

- Waterbody
- Road (major)
- Road (minor)
- River

0 20 40 km
Scale 1:750,000
Data Sources : © Commonwealth of Australia, World Heritage Areas.
Projection : Transverse Mercator
Datum : Geocentric Datum of Australia 1994
Date : January 2014



Impact of de-listing on World Heritage Area



The Australian submission purports to use disturbance as the main justification for the proposed de-listing but this claim is not supported by the facts.

Given that the relative proportion of disturbance from logging in the area proposed for de-listing is comparable to that in areas proposed to be retained, the claim that areas were selected based on disturbance levels cannot be substantiated.

Based on the maps accompanying the submission, there is no apparent logic to selection of the areas proposed for de-listing, apart from the harvestable timber resource some of the areas contain.

Similarly, the evidence provided by the configuration of the proposed modified boundary is too illogical to suggest that boundary improvement was an objective.

The conclusion must be that areas selected for de-listing were not based on World Heritage Integrity or OUV considerations.

IMPACT 1:

Serious reduction in integrity of OUV's in the area

There are numerous attributes and features (see above) within the proposed de-listing that if de-listed will have the effect of significantly reducing the **integrity of the OUV's** in the area. Most notable will be the serious impact on the Integrity of the Tall Eucalypt Forest ecosystem.

[The tall eucalypt forests in the Tasmanian Wilderness World Heritage Area (TWWHA) represent the world's premier example of temperate tall eucalypt forest; truncation of this tract of forests up the eastern margin of the WH Area by the proposed de-listings will seriously detract from the Outstanding Universal Value of these magnificent forests.]

IMPACT 2:

Serious reduction in integrity of boundary.

Notwithstanding statements to the contrary in the Australian submission, the new boundary that would result from the proposed de-listing is ill-considered and would seriously compromise Integrity of the Boundary of the WH Area.

The excision would re-open the management challenges of concern to the WH Committee and advisory bodies over a 25 year period that were finally resolved by the Committee's decision last year to add the areas in question to the WH Area.

IMPACT 3:

Serious threat to fire susceptible vegetation:

The proposed de-listing would allow commercial logging to once more extend right up to the vicinity of fire susceptible vegetation communities, thereby increasing the threat to the OUV's of the area. (e.g. Snowy Range, Adamson's Peak, Hartz Mountains)

[One of the important secondary benefits of the 2013 additions to the WH Area was that vegetation communities that are highly susceptible to fire (e.g. alpine shrublands and herbfields) would be effectively buffered from fire escaping directly from logging operations, or traveling through logged and regenerated eucalypt.]

Background – context of submission

The Australian Government submission proposes excision from the World Heritage Area of approximately 26 separate parcels of land, mostly forested lands. All of the 26 areas were part of the 2013 additions to the WH Area, representing about 43% of the 2013 additions.

The claim made in the submission about how these areas were selected for de-listing lacks credibility and has the hallmarks of an ad hoc or political decision.

The apparent ad hoc approach is reflected in the boundary that would result from the proposed de-listing, a boundary that is longer, inappropriate, has no intellectual merit and which destroys much of the Integrity of the existing boundary.

Although the Australian Government submission is unapologetic about the objective of supplying additional timber resource to industry, some areas proposed for de-listing rather puzzlingly have little or no timber resource.



Issue of claimed disturbance

The Australian Government submission seeking to de-list part of the TWWHA claims the alleged 'disturbed' condition of the area as justification. This claim is not supported by the facts. See Alert 4 above.

Domestic public opposition to the move by the Australian government to de-list 74 000 ha from the TWWHA is intense. The only political means available to the government to support its move to return such magnificent forests to the logging industry is to portray them as too damaged to be of World Heritage Value.

Attempts to justify the government's action include interpreting natural regrowth from wildfire, a feature of the natural processes operating in eucalypt forest and which contributes to the ecological integrity of the WH Area, as unacceptable disturbance! Further, it is being suggested that any area that does not meet strict wilderness conditions cannot be included in the WH Area simply because it is known as the Tasmanian 'Wilderness' World Heritage Area.

Reality check

Is there disturbance?

Yes, it is acknowledged that some areas of previously logged forest were included in the 2013 additions but with good reasons that were acknowledged in the nomination. Rather than create a 'Swiss cheese' area that excludes patches of logged forest and creates a management nightmare, the proposal accepted by the WH Committee was to maintain or restore ecological integrity of these great forests at the landscape level.

Rehabilitation?

Patches of tall eucalypt forests that have been logged, burned and seeded can be easily rehabilitated if they are embedded in larger areas of intact forests. With more active management, small areas of forests converted to plantations can also be restored to eventually achieve full rehabilitation of natural processes. It is noted that rehabilitation is one of the core obligations of State Parties (Para 4, Article 5 of the Convention)

How much disturbance?

By independent analysis of forestry authority maps, the ***proportion of disturbance by logging in the forests proposed for de-listing is around 9.9%*** of the total area, (of which about 4% has been 'heavily disturbed' (e.g. recent harvesting)) and is mostly represented by patches logged once at some time over the past 50+ years. A far greater proportion of the parcels proposed for excision have never been logged.

Meet conditions of integrity?

Inclusion of the logged patches in the 2013 nomination was transparent in the nomination and readily met the Conditions of Integrity, especially the most relevant Conditions - 90, 93 (for Criterion (ix)), 94 (for Criterion (x)). In accordance with Condition 93, the 2013 additions embraced comprehensive ecological diversity in the tall forest ecosystem, including in some cases areas previously logged but with the potential (and intention) to achieve full ecological recovery.

Wilderness?

While a large proportion of the 'Tasmanian Wilderness' area is indeed of outstanding wilderness quality, it has never been a requirement that the whole WH Area meet this standard. Small areas of disturbance occur in other parts of the WH Area are actively managed to continually improve the area's integrity. The WH Area has never been all wilderness. By improving the boundary and ecological integrity of the WH Area, the 2013 extension undoubtedly improves the wilderness value of the overall area.

Theme of 2013 nomination?

The theme of the 2013 additions was to properly recognise and protect the tall eucalypt ecosystem for its important contribution to the integrity of the then existing WH Area.

The 2013 additions identified that most of the nominated tall eucalypt forests comprised a single integrated tract of forest exhibiting effective regional scale ecological connectivity. Maintenance of that connectivity required incorporation of some logged areas needing rehabilitation.

The proposed de-listing would effectively destroy that connectivity, seriously degrading the ecological integrity of the forests and greatly reducing the contribution of the forests to the Integrity of the Outstanding Universal Value in the remaining World Heritage Area.

Recommendations

GIVEN:

- That the Australian submission for de-listing parts of the Tasmanian Wilderness World Heritage Area does not meet the requirements of Para 163 (Operational Guidelines) for consideration as a 'minor modification' and arguably should not be on the agenda of the World Heritage Committee
- That the proposed de-listing would have a significant adverse impact on the Integrity of the Outstanding Universal Value and the boundary of the TWWHA, and
- That a dangerous precedent would be set should the World Heritage Committee approve de-listing of part of a World Heritage property for commercial resource development

We RECOMMEND:

1. THAT the World Heritage Committee remove the Australian submission from the agenda, as it does not comply with Para 163 Operational Guidelines requirements to be considered as a 'minor modification' and/or
2. REJECT outright the Australian Government submission for de-listing any part of the Tasmanian Wilderness World Heritage Area.



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