

Wild Drake P/L

Summary response to public comment v3.1

Halls Island Standing Camp, Lake Malbena, Tasmania (EPBC 2018/8177)

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1. Key issues raised – summary

Summary of key issues / high public interest issues raised via the RFI public comment, in approximate order of interest:

1. Privatisation of public land, exclusive use lease provisions, and associated restrictions on access to public land
2. The use of public land for commercial outcomes
3. Soundscape impacts relating to the use of helicopters
4. Potential impacts to Tasmanian wedge tailed eagles
5. Matters relating to Aboriginal heritage.
6. Potential impacts to alpine sphagnum bogs and fens, and endemic conifers
7. Standing Camp form and design
8. The need to address all potentially relevant OUV listing criteria in the RFI documentation
9. Information contained in the RFI in relation to pre-existing and proposed Tasmanian Wilderness World Heritage Area (TWWHA) overflights, landings and commercial operations
10. Bushfire clearing requirements.
11. Comments relating to remoteness, wilderness quality assessments
12. TWWHA Management Plan 2016 related matters
13. Qualifications of the proponent to provide the RFI materials
14. Future proposed developments at this site
15. Risk of fire to on-island flora communities of significance

All key issues have been addressed in the *RFI Submission v3.0 - post consultation* document, including additional information as required and noted as appropriate below.

At no time during the RFI assessment and associated comment process did any external party submit any new expert evidence or peer researched findings that contradict the statements within the RFI relating to the protection of Tasmanian wedge tailed eagles.

At no time during the RFI assessment process did any external party submit any form of new expert evidence or peer reviewed information relating to noise or wilderness soundscape modeling. Comments were submitted in relation helicopter to noise and wilderness, but no comments contained new evidence including noise or wilderness soundscape modeling in support of the comments.

No public comment has provided evidence-based materials that illustrate that any actions will result in significant impacts to Matters of National Significance as defined by the EPBCA. We note that '*a significant impact*' is an impact which is defined as '*important, notable, or of consequence, having regard to its context or intensity*' (Australia, 2013). An assessment of significance should include '*the sensitivity, value, and quality of the environment which is impacted, and ... the intensity, duration, magnitude and geographic extent of the impacts*' (Australia, 2013). We strongly highlight that no comments provided information as to the *importance, notability or consequence of the proposed action in relation to the context or intensity of potential impacts*, supported by peer reviewed research or expert evidence. While submissions do discuss potential impacts from the action, the comments avoid the issues of context, intensity (including seasonal and daily frequencies) and duration, and ignore these combined characteristics in their respective comments.

We acknowledge that the majority of the comments received are based around the preference for a particular group of stakeholders to preserve the entire Tasmanian Wilderness World Heritage Area

(TWWHA) for non-commercial overnight bushwalkers only. This approach is exclusionary. Overnight bushwalkers are a significant minority among the TWWHA visitor categories, and 85% of the landmass of the TWWHA is reserved for this specific user group and associated high-purism wilderness recreation outcomes via the Wilderness Zone zonation. We welcome this protection of 85% of the TWWHA as IUCN 1b equivalent Wilderness Zone. However, the remaining 15% of the TWWHA (such as Lake Malbena) is managed for a spectrum of other uses, including commercial operations and infrastructure which add to the diversity of product, equity of access, increased presentation, and other goals of the TWWHA Management Plan 2016. To paraphrase well-known long distance hiker Cheryl Strayed, the idea that the only users welcomed should be independent bushwalkers is rooted in elitism and a sense that wilderness only belongs to the people whom have the means and the resources to prepare for it with lots of expensive equipment, intensive research, time, experience and athletic ability. This proposition is a moral proposition only, and from a wilderness management perspective is contradictory to the TWWHA Management Plan 2016, and contrary to contemporary global best practice aimed at developing and managing different types of wilderness areas, for differing wilderness recreation uses and users, diversity of experience, equity of access and high quality presentation.

2. About the Response to Comments documentation

This response document should be read with the associated documents:

1. Post Comment document '*RFI Submission v3.0 - post consultation*'. This document represents the primary Response For Information request document, complete with updated details relevant to the public comments received.
 2. Post Comment '*RFI Appendices – post consultation*'. This document represents the updated Response to Information document appendices, including new three new appendices arising from responses to public comments (42, 43 & 44).
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3. About the comment process

The public comment process was advertised (newspaper advertisement), and comment was conducted for an extended comment period during September / October 2022. Comments were facilitated by way of a web-based platform allowing simple text comments of up to 500 words, or extended comments by way of uploaded pdf's. The webpage was created using the ubiquitous and user-friendly WordPress platform and Gravity Forms ensuring useability across device types. Website functionality was monitored and ensured via the Better Uptime app.

Additional hardcopies of the RFI materials were made available at the Central Highlands Council chambers (Bothwell, Tasmania), the Parks and Wildlife Service (PWS) offices (Hobart), and the Department of Climate Change Energy the Environment and Water (DCCEEW) offices in Canberra.

The proponent notes relevant attempted interference in the RFI public comment process by The Wilderness Society Tasmania, whom used ABC Statewide radio, print media, and social media to request the public not to provide comment, and incorrectly claim that the formal public comment process undertaken did not comply with the EPBCA requirements.

4. About the comments

626 comments were received, which have been recorded, itemised, and supplied to the Department of Climate Change, Energy and Environment and Water (DCCEEW).

Each comment was allocated a unique Entry ID by the web platform, with comments downloaded via the website portal as a single csv file. There are some gaps in the entry i.d. numbers (they are not all sequential), presumably relating to comments that were allocated a unique id by the webpage, but not finalised (not submitted). Each entry was timestamped.

Of the 626 comments received, approximately 200 were pro-forma comments. Many dozens, if not hundreds of additional submissions represent longer submissions that were also re-submitted in cut-and-pasted form as multiple short paragraphs. Two submissions from the Wilderness Society Tasmania represented additional pro-forma comments from a large number of database contacts collated through the database-building lobbyist platform 'Do Gooder' used by the Wilderness Society Tasmania.

One submission was received from the Environment Defenders Office (EDO), on behalf of the Wilderness Society. This submission consisted primarily of duplicate information previously submitted to the DCCEEW prior to the original Controlled Action Decision. As comments in response to the RFI, these duplicate submissions did not offer new information, and have been thoroughly addressed through the RFI process both prior to the Controlled Action Decision, and in the proponent's response to the RFI request from the DCCEEW. As such no response to this specific duplicate information has been required.

Late comments were received outside of the public comment period from the state based National Parks and Wildlife Advisory Council (NPWAC), and the Aboriginal Heritage Council (AHC). Both comments were accepted by the proponent, despite being received outside of the comment period.

5. How the comments were addressed

All comments have been read and considered by the proponent, guided by the requirements of the Environment Protection and Biodiversity Conservation Act 1999 (EPBCA). Additional specialist advice was sought and received from experts North Barker Ecosystem Services in relation to a small number of comments, with new materials added to the '*RFI Submission v3.0 - post consultation*' document as appropriate.

Comments or opinion that did not provide or express a clear reference to factual information relevant to matters considered under the EPBCA were nominated as general comments by the proponent. Pro forma comments (and variations) were addressed on a single occasion in relation to the EPBCA matter of interest. Comments that required addressing under EPBCA considerations have been addressed below, after being categorised into the matter of interest relevant to the EPBCA considerations. Where required, additional material was added to the '*RFI Submission v3.0 - post consultation*' document, in order to ensure that the public comments were addressed in full.

6. Response to key issues and comments received (presented in approximate order of public interest)

The following list represents comments received in approximate order of public interest.

Following the response to comments (6.1 – 6.15), the pro-forma comments are addressed with stand-alone responses at (6.16). Comments received from the state regulator Parks and Wildlife Service Tasmania are addressed in stand-alone responses at (6.17).

6.1 Privatisation of public land, exclusive use lease provisions, and associated restrictions on access to public land

Comment: Access to Halls Island remains at the control of the proponent.

Response: The proponent has previously committed to continued public access to Halls Island, through the current public access program. To the best of the proponent's knowledge, this access program is the first of a kind in the TWWHA, relating to areas under commercial lease.

As a further response to public comment, and to transparently demonstrate and fulfill the proponent's commitment to continued public access to Halls Island, the proponent has written to the PWS, requesting that the current public access program become a binding requirement of the Wild Drake P/L Lease and Licence, ensuring that continued public access is therefore at the control of the PWS (the landowner), as opposed to the leaseholder Wild Drake. Additional materials have been added to RFI document at section (8.3), pg 118, and the written request sent to the PWS has been included in the appendices (42). To the best of the proponent's knowledge, this initiative will be the first TWWHA Lease to contain a provision of continued public access by way of formal public access program.

6.2 The use of public land for commercial outcomes

Comment: Numerous comments state the belief that the TWWHA should not be used to generate commercial outcomes.

Response: The proponent notes that economic benefits from commercial use of the TWWHA are an integral component of TWWHA management, and ensures that Tasmanian's are able to benefit from the ecosystem provisions of the TWWHA. Page 149 of the TWWHA Management Plan 2016 supports this position:

'Commercial tourism is a legitimate and important component of meeting the obligation of presentation under the World Heritage Convention and in meeting the management objectives under the NPRMA for the encouragement of tourism and recreation.'

6.3 Soundscape impacts relating to the use of helicopters

Overview:

Three comments were received specifically dedicated to potential soundscape impacts of helicopter use, and associated modelling. One submission did not reference any materials in the RFI, and contained no relevant information. A second submission referenced information contained in the appendices, however did not address any information found in the primary RFI document. As a result, the submission contained no useable or relevant information. A third longer submission relevant to 'acoustics' was submitted as a component of a larger comment. The author of this submission acknowledged that he does not possess

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experience or skills relating to wilderness impact assessments, wilderness management, wilderness soundscape impact modelling or mensuration.

No comments were received providing specific information relating to the context, intensity, or duration (eg: temporal patterns) of the potential impacts, all of which are required under the EPBCA considerations (Australia, 2013).¹

A second point of note is the difference between the field of noise management and acoustics, and the field of wilderness soundscape management. Noise management and acoustics is a different (though related) field of expertise to wilderness soundscape management, where the former is focussed on excess noise (energy), while the latter is focussed on the prevalence of natural sounds². Comments received were written from a perspective of noise management, rather than wilderness soundscape management specific to the TWWHA.

6.3.1 Comment: There are two relevant considerations to measuring the potential noise impacts:

a. Potential for users of the surrounding area to experience a detrimental impact to their pleasant and enjoyable experience of the place, and

b. Potential for a detrimental impact on the quality of wilderness in the surrounding area

The commentor then goes on to list challenges that he has in assessing these parameters as *'(a) can't be easily addressed'*, and suggests something called a *'wilderness character deficit assessment'* as a suitable substitute.

Response: The proponent would like to highlight that he is not aware of an assessment process called *'wilderness character deficit assessment'* in wilderness soundscape management, mensuration, or similar fields of expertise or research. Importantly, the accepted wilderness soundscape assessment methodologies (such as McKenna et al) that were used by the proponent in the RFI document *includes* assessments of both (a) and (b), and are based on peer-reviewed research and assessment frameworks.

6.3.2 Comment: The McKenna et al paper cited in the RFI document was made for assessing impacts at the 'Haleakala NP', not general wilderness reserves.

Response: The McKenna et al assessment framework referred to in the RFI document was created for use in wilderness areas, and was informed in part by the published research conducted by Rapoza et al (2014) which included sample surveys and studies from numerous representative wilderness areas sampled across the USA (five different wilderness reserves), and included varied user groups from day-use wilderness visitors to multi-day overnight wilderness users. The Haleakala NP example is a simple case study used in the paper, not the basis of the framework.

It is relevant to note that the proponent is well versed in the McKenna et al (2015) framework and related Rapoza et al (2014) research, and is currently part of an international academic wilderness research group that includes members whom were part of the Rapoza et al (2014) dose-response research.

6.3.3 Comment: Comment relating to audibility, and the use of LAeq or the substitute 'time above measure' (the latter was used in the RFI modelling).

¹ AUSTRALIA, C. O. 2013. Matters of National Environmental Significance, Significant Impact Guidelines 1.1. Environment Protection and Biodiversity Conservation Act 1999. Commonwealth of Australia.

² See for instance BROWN, A. 2010. Soundscapes and environmental noise management. Noise Control Engineering Journal, 58, 493-500.

Response: The use of LAeq or the substitute 'time above measure' was covered comprehensively in the RFI document under the header 'Reliability of the Information' on page ~96, and includes supporting peer reviewed references.

6.3.4 Comment: In reference to Figure 2 on page 12 of the original RFI document, the commentor questions the accuracy of the mapping due to the presence of the Malbena overflight outline in Map 2.

Response: The overflight outline is merely that, an outline, and the flight path mapping buffers are turned off. This is also somewhat a moot-point from: the mapping is simply a visual expression of Table 3 and the flight path information contained within, which also confirms that the mapping as presented is correct.

6.3.5 Comment: 'The proponent asserts the appropriateness of the model it uses to assign labels to tiers of impact of overflight noise and that it is consistent with Australian experience around Whitehaven Beach...'

Response: The comment misquotes and misunderstands the RFI documentation, and is incorrect and misleading. The RFI documentation does not equate any equivalence to recreational settings at Whitehaven Beach. Instead, the RFI states that '*The assessment method and framework corresponds well with that used in the Whitehaven Beach GBRMPA soundscape report (Hamilton, 2003), the Kissick (2018) study of New Zealand protected area overflight impacts, the Hackett (2021) assessment of overflight impacts in the TWWHA, and the McKenna et al (2016) peer reviewed assessment framework*' (see 'Reliability of information' approx. page 95 of the RFI for instance). Specifically in relation to the Whitehaven soundscape reporting, the recorded ambient sound levels, and noise levels associated with aircraft, correspond well with those presented in the RFI modelling.

6.3.6 Comment: In reference to helicopter sound impacts, the approach should '*assess these 'local' impacts by estimating the cumulative time that helicopter overflights would be audible at specific points on the ground, or within specific defined areas (e.g. 500m grid squares)*'.

Response: The suggested approach above disregards the complete suite of temporal factors such as daily and seasonal intensity, and ignores other critical information such as anticipated dose-responses from other users in the area (eg: disturbance or annoyance). In summary, the suggested approach does not correlate to any peer reviewed published research or approaches to the mensuration of wilderness soundscape impacts, including those methods currently accepted as best practice in the USA or New Zealand.

6.3.7 Comment: The proponent has ignored soundscape impacts outside the Wilderness Zone, on the spurious assumption that wilderness impacts outside the zone are automatically acceptable

Response: This comment is incorrect: the soundscape impacts both inside and outside of the Wilderness Zone have been quantified and characterised, and are shown in Table 3, page 94 of the RFI document. The overflight soundscape impact maps Figs. 18 & 19 are a visual representation of the assessment of TWWHA overflight impacts determined in Table 3, page 94 of the RFI document, relevant to the Wilderness Zone specifically, however the Table 3 of the RFI document contains the complete soundscape impact assessments for the whole of the TWWHA overflight impact area.

6.3.8 Comment: The proponent's calculations do not take account of the auditory impact of helicopters landing and hovering at Lake Malbena.

Response: This comment is incorrect. The soundscape assessment method applied a 4 minute penalty to each overflight, to allow for a time penalty relating to the landing and take-off (or hovering) procedure at the each end of flights. This is consistent with the approach tested and applied in Hackett (2021)³.

6.3.9 Comment: The fact that the frequency of soundscape impacts falls in the lowest category that McKenna et al. used does not imply that lower frequencies cannot be quantified, nor that the frequencies in question are insignificant in the context in which they are being considered (i.e. auditory impacts in the TWWHA).

Response: The proponent does not claim that the McKenna et al provides a threshold to identify whether an impact is 'significant' or not in relation to the EPBCA. The proponent has presented the soundscape assessment using peer-reviewed assessment protocol, which arrives at a determination that characterises the impact measured as being at the very lowest levels. This assessment outcome, in addition to consideration of the overflight characteristics (such as temporal and spatial characteristics, and character of the location along the eastern boundary of the TWWHA), paired with relevant case studies of existing aircraft use in the TWWHA were then used to make the reasonable and precautionary judgement that the impact is neither significant, new in form, or permanent.

6.3.10 Comment: The proposed flight path will impact on the amenity and World Heritage values of Skullbone Plains Reserve, including the sense of remoteness and naturalness.

Response: Based on more than 10 years operational experience on the Skullbone Plains reserve, the proponent has an in-depth understanding of the sense of remoteness and naturalness at Skullbone Plains. Much of the reserve was logged in the early 2000's. Current access to Skullbone Plains and the primary camping area is by motor vehicle (including cars, four-wheel drives, motorbikes, small buses, and previously private helicopters), ending at a large standing camp and toilet facilities provided by the land owners (the Tasmanian Land Conservancy). The location is under the direct commercial flight route between Hobart and Cradle Mountain, and additional daily flights between Hobart and King Island. The neighbouring properties to the south and east include Crown land managed by Sustainable Timber Tasmania for on-going commercial forestry operations, activities of which can be heard across the Skullbone reserve for extensive periods (in the form of logging activities, and truck movements). Recreational hunting also occurs adjacent to the reserve, on both Crown land, and private land to the immediate north, west and south. Shooting (soundscape impacts) and spotlighting (dark sky impacts) impact Skullbone on a regular occurrence, derived from the neighbouring lands. Regular and permanent impacts to the remoteness and naturalness of the property (beyond the previous logging activities and current extensive road network) occur due to the proximity of Skullbone Plains to the Lyell Highway, which contributes permanent soundscape impacts to the property (in the form of log truck exhaust-brakes and motorbikes sounds) on an almost daily occurrence (depending on wind conditions). In summary, there is no reasonable way through which it could be argued that the proposed small volume helicopter use could impact the sense of remoteness or naturalness (expressed as the existing recreational settings) found on the reserve.

³ Hackett, D., 2021. *Incorporating overflight-derived wilderness soundscape impacts into the revised National Wilderness Inventory system: Case study, Tasmanian Wilderness World Heritage Area*. Masters thesis, School of Geography, Planning and Spatial Sciences. University of Tasmania. 2021

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6.4 Potential impacts to Tasmanian wedge tailed eagles

Several general comments were received in relation to perceived threats to Tasmanian wedge tailed eagles, however no new information, evidence or expert opinion was supplied. One comment (see below) was submitted specifically relating to Tasmanian Wedge Tailed eagles and the National recovery plan:

6.4.1 Comment: *'We are concerned about the potential cumulative risk of the proposed frequency of helicopter use within the proposed flight path to the nationally endangered Tasmanian wedge-tailed eagle (Aquila audax fleayi)... this escalation of risk would define 'frequency of helicopter usage' as a key threat according to the National recovery plan: Threatened Species Section (2006). Threatened Tasmanian Eagles Recovery Plan 2006-2010. Department of Primary Industries and Water, Hobart.'*

Response: The comment received provided no expert evidence or peer reviewed research to provide validity to the comment, and no reference was provided in regard to effectiveness or otherwise of the proposed mitigation and avoidance measures relating to the action. Potential impacts to Tasmanian wedge tailed eagles have been addressed in full within the RFI documentation, with independent expert advice from Mr Nick Mooney, who is listed as a major expert contributor to the *Threatened Tasmanian Eagles Recovery Plan 2006-2010* referred to in the comment. As a matter of additional accuracy and clarification to this comment, the *Threatened Tasmanian Eagles Recovery Plan 2006-2010* does not contain 'frequency of helicopter usage' as a key threat.

6.4.2 Comment: In relation to the mitigations provided regarding impacts on Tasmanian wedge-tail eagles (*Aquila audax* subsp. *Fleayi*), the commentor considers that further analysis is required particularly in relation to the application of critical distance.

Response: This comment relating to Tasmanian wedge tailed eagle management is not supported by the existing published research, case studies, or evidence. No changes required to the RFI documentation.

6.5 Matters relating to Aboriginal heritage

Numerous comments state that *'the proponent has failed to commission an Aboriginal Heritage Assessment Report to investigate and assess the development's impact on Aboriginal heritage'*, and *'the proponent has not sought advice on intangible Aboriginal heritage'*. Numerous comments state that Aboriginal communities have not been consulted. These comments are ill informed, and misleading.

As noted in the RFI, for instance at mitigation and avoidance measure no.34 on page 106, *'In addition to Aboriginal Heritage Tasmania (AHT) advice received, the proponent has voluntarily engaged a suitably qualified archaeologist and Tasmanian Aboriginal Heritage Officer to provide further advice relating to the proposal, including a survey of the camp installation site and immediate surrounds for heritage items, and the provision of additional advice relating to intangible cultural heritage'*.

The proponent has been in consultation with the members of the Tasmanian Aboriginal communities since 2015, prior to formal assessments of the project; the proponent engaged early, as per the EPBCA guidelines. The proponent holds records of more than twelve in-person meetings, phonecalls, and emails with Aboriginal groups since then, and for transparency, has included a copy of minutes as appendices (appendix 42, prepared by staff of the Tasmanian Aboriginal Centre) from the first of these meetings between the proponent, the Tasmanian Aboriginal Centre (TAC), and the Aboriginal Land Council of Tasmania (ALCT) in 2015. In more recent years the TAC has refused offers from the proponent to meet with the organisation (offered by the proponent and rejected in writing by the TAC on two occasions). We also note that Aboriginal representative organisations are aware that an Aboriginal Heritage assessment *has* been

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conducted on the ground at Lake Malbena, conducted by archaeologists and a registered Tasmanian Aboriginal Heritage Officer; the TAC was consulted three times by the Aboriginal Heritage Officer: on the 2/5/2019 (verbal), 20/5/2019 (meeting), and the 29/7/19 via email when the TAC was also provided with a draft copy of the Aboriginal Heritage report for comment or input within 14 days (no comment was received).

6.6 Potential impacts to alpine sphagnum bogs and fens, and endemic conifers

Comment: Concerns in relation to regeneration of existing track braiding in sphagnum bog and alpine fen communities, and potential impacts of urination on bogs around camp.

Response: Current track braiding will be allowed to naturally regenerate, whilst being protected from existing and further impacts via the installation and use of the perforated raised boardwalks: this approach is in line with national best practice, and is a proven method used in both the TWWHA, and Kosciuszko NP. Previously addressed on RFI page 78 & 79 (for instance).

Urination will occur in toilet pods, not on the exposed sheet rock around camp, or on the sphagnum habitat.

6.7 Standing Camp form and design

6.7.1 Comment: Detail regarding the Standing Camp and suggestions for design update.

Response: The proponent has committed to voluntarily update the design of the standing camp to incorporate key new elements of the 2021 Standing Camp Policy. Modifications are minor in nature, by way of commitment to avoid permanent fixtures to the ground (use only gravity or weighted anchors), and implement minor adjustments to the scale of the pods to comply with new minimum size regulations of 8m2 per customer. See RFI document section titled 'Standing Camp design – clarification of updated details' (RFI pg 11).

6.7.2 Comment: Lack of detail in designs, no apparent location for toilet facilities.

Response: The toilets are clearly labelled and shown in the extremely detailed preliminary design documents starting on page 181 of the RFI appendices.

6.7.3 Comment: The images in the proponent's submission does not include renders that allow the reader to understand the context and extensiveness of the Standing Camp and supporting infrastructure.

Consequently, a full understanding of the impact of the proposal cannot be adequately assessed.

Response: The renders and architectural plans have been sufficient for use in Development Applications, Planning Tribunal Hearings and PWS assessments. Appendix 11, starting p181 contains extremely detailed site plans and designs.

6.7.4 Comment: Wastewater management (showers) and lack of water supply/collection.

Response: To be clear there are no traditional showers proposed (and never has been). There is space to hang a camp style shower bag for a minimal-water use camp shower (with complete capture greywater). Water usage figures were based on previous standing camp water production and usage figures, and interrogated at the Resource Management and Planning Tribunal Hearings (Tas). The figures are reliable, and based on operational experience. In relation to the ability to capture enough rainwater, independent engineering reports confirm the ability to catch up to 160KL of water per annum (well exceeding the ~4000lt annual camp requirements). This information was previously covered at Resource Management and Planning Tribunal hearings (Tas).

6.7.5 Comment: No investigation has occurred relating to a potential walking-in route alternative to access Lake Malbena

Response: The November 2016 North Barker flora and fauna survey included walking into Lake Malbena to conduct surveys of EPBCA listed species and communities along the existing walking route, as detailed in appendix 9 of the RFI. The surveys found the route unsuitable for commercial operations due to the presence of EPBCA communities such as ASP, and associated risks such as trampling and track formation.

6.8 The need to address all potentially relevant OUV listing criteria in the RFI documentation

Comment #1: Not all TWWHA Criterion have been overtly considered in the documentation.

Comment #2: 'Wild Drake's main response document and appendices do not thoroughly address paragraph 3(f) of the RFI, especially so far as it pertains to the attributes of the TWWHA giving it World Heritage value under World Heritage criterion (ix), and corresponding National Heritage values (of the TWNHP), 'that occur, or have the potential to occur, in the project area and adjacent area'.

Response: After consultation with Flora and Fauna consultants North Barker, additional reference to all other TWWHA Criterion has been added to the RFI documentation at final paragraph of section (3h) pg. 53.

6.9 Information contained in the RFI in relation to pre-existing and proposed Tasmanian Wilderness World Heritage Area (TWWHA) overflights, landings and commercial operations

6.9.1 Comment Other existing TWWHA flight operations pre-date World Heritage Listing, and are therefore not comparable to the proposed overflights

Response: We acknowledge that some existing TWWHA flight operations pre-date World Heritage Listing. This however does not exclude all operations from applying best-practice impact mitigation and avoidance measures in relation to overflights of the TWWHA, or being subject to the same provisions of the EPBCA.

The proponent notes that the approximate number of walkers departing Melaleuca on the South Coast Track at the time of World Heritage listing was less than 200 p.a., and that walker numbers have now greatly increased to more than 1400 p.a., in addition to the growing number of touristic day flights ex Hobart by commercial operators. By any definition it could be strongly argued that the resultant exponential increase in overflight traffic between Hobart and Melaleuca during the past thirty years, impacting on approximately 13.5% of the TWWHA Wilderness Zone soundscape, could be defined as an 'intensification of activity' under the EPBCA, and result in the requirement for assessment under the Act. We are not making the suggestion that this should occur, but merely note that any notion of historical activities being somehow different in character than a newly proposed activity in the TWWHA is not a valid argument in respect to management and protection of TWWHA values, or environmental obligations under the EPBCA.

6.9.2 Comment: *'No other flight operations provide passenger transport for a private commercial operation in the TWWHA'*

Response: This is incorrect. The Par Avion Standing Camp in the south-west is accessed by guests who arrive nearby by plane, and complete the journey by mechanised boat, or undertake daytrips before returning to Hobart. These flights represent approximately 65% of the current overflights of the TWWHA. Secondly, mothership operations in the estuaries of the south-west are accessed by guests arriving by seaplane.

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Thirdly, commercial operators guiding groups along the South Coast Track rely on air transport to access the track at Melaleuca. None of these operations use air access arrangements that have undergone any form of federal assessment against the provisions of the EPBCA, therefore the proposed Lake Malbena overflights will represent the first TWWHA overflight to have undergone assessment and impact mitigation and avoidance actions under the EPBCA.

6.9.3 Comment: The proposed helicopter use will require a purpose-built landing pad according to civil aviation regulations

Response: The proposed heli landing site (HLS) has been inspected by three pilots, from two aircraft contracting companies, and all agree that it is fit for purpose without the need for a constructed pad. The site confirms to a Basic HLS under CAAP 92.2⁴.

6.9.4 Comment: The flight path will not 'represent the only regulated flight path over the TWWHA' as only CASA and Airservices Australia can make such regulations.

Response: It is proposed that the flight path will be regulated via a condition of approval under the EPBCA, if granted.

6.9.5 Comment: The RFI document statement '*the proposed use of helicopters represents a new benchmark in best practice*' is false, and has no basis.

Response: The proposed use of helicopters will be the only TWWHA overflight that is regulated to avoid overflights of the Wilderness Zone, avoid overflights of walking tracks, incorporates meaningful Tasmanian wedge tail eagle mitigation strategies, and subject to caps on annual frequency and overall volume. This has been demonstrated through the assessment documentation, and by definition therefore represents a new level of oversight and best practice in the avoidance of wilderness soundscape and fauna impacts relating to overflights of the TWWHA.

6.9.6 Comment: The proponent is suggesting that overflights by large commercial aircraft should be regulated.

Response: There is no suggestion that large commercial aircraft (for instance aircraft flying over 3000m, as implemented in the Kakadu FNA developed under the EPBCA⁵) should be regulated.

6.9.7 Comment: The proponent has not provided evidence that the current TWWHA Fly Neighbourly Advice (FNA) is poorly drafted, or outdated.

Response: The current TWWHA FNA provides no effective soundscape impact mitigation or avoidance measures, little to no measures that protect recreational experience across the TWWHA, no caps on aircraft usage or frequency of overflights, no overarching overflight impact management strategy from a wilderness, experiential or soundscape perspective at the landscape scale, does not incorporate any form of eagle impact monitoring strategy, does not require any flight records to be supplied to the land manager (PWS), and what is prescribed in relation to such factors as minimum altitudes are not effective at preventing

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https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=MP08_0156%2120190808T015728.195%20GMT

⁵ <https://www.dcceew.gov.au/sites/default/files/env/resources/eeda2dfe-9918-4bea-b426-8b3bfcc2e5fd/files/2010-kakadu-fna.pdf>

potential impacts to recreational users (primarily as they are above-sea-level measures, rather than above-ground level measures).

6.9.8 Comment: There is no proposal to amend the existing TWWHA Fly Neighbourly Advice (FNA) that has been made aware to the Tasmanian aviation community.

Response: The PWS service has publicly committed to developing a modernised Air Access Policy for the TWWHA. For instance see

https://www.premier.tas.gov.au/site_resources_2015/additional_releases/update_on_tasman_highway_works/supporting_sustainable_and_sensitive_development_in_our_tasmanian_wilderness_world_heritage_area

6.9.9 Comment: One comment takes exception to the comparison of Maatsuyker overflight and Malbena overflight impacts

Response: The Maatsuyker, Walls Of Jerusalem, and proposed Malbena flights are the only flights that avoid overflights of the Wilderness Zone. This is a simple statement of fact as demonstrated through the documentation and supporting appendices.

6.9.10 Comment: In relation to existing Melaleuca overflights, the comment states that overflights do not occur for 75% of the year.

Response: The data limitations and reasoning for using the 75% threshold in the RFI documentation was explicitly highlighted at Table 3 of the RFI documentation (page 91). We note that the applicable commercial operator(s) using this location have not made elements of their TWWHA flight frequency data available to the PWS, or any other entity, therefore the 75% threshold remains appropriate to ensure a conservative, precautionary approach to the modelling in compliance with the EPBCA guidelines. We strongly encourage those specific operators to make all data relating to the use of public airspace, public soundscapes, and public landing areas transparently available for use in the research and management of the TWWHA and the general public benefit.

6.9.11 Comment: Aircraft flight heights / FNA / claimed breaches of TWWHA FNA.

Response: The proponent does not, and has not made any claims that operators breach the existing TWWHA FNA. We do however note that under the existing and outdated FNA, any operator can effectively overfly or fly-by the highest wilderness quality area in Tasmania at 4500 ft, including Federation Peak which sits at ~4100ft, leaving a potential buffer of just 400ft. This obviously provides no impact mitigation benefits from an environmental or experiential perspective.

6.10 Bushfire clearing requirements.

Comment: Information request detailing vegetation clearance required for fire prevention requirements.

Response: There are no anticipated clearance requirements for bushfire prevention. Hazard Management Plans (HMP's) and associated Emergency & Evacuation Plans are only finalised at the point of local planning design approval in negotiation with the Tasmanian Fire Service (which can only occur after PWS design approval). The operation will manage and mitigate risk primarily through small groups sizes, no operations on days with declared catastrophic fire ratings, and emergency egress by helicopter. The lake may also be used as a safe refuge as an element of the emergency and evacuation plan. This information has been added

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to section (6.2) of the primary RFI documentation. This outlined approach is consistent with the bushfire hazard mitigation approach of other TWWHA standing camps, tent platforms, and a small number of public huts over the past 10 years. Only larger lodge-style huts have required clearings due to the need to shelter larger numbers of persons (for example), however these are completely different case studies and are therefore not comparable. The proponent has previously sought advice from North Barker on the matter, whom are certified to undertake and certify Bushfire Hazard Management Plans.

6.11 Comments relating to remoteness, wilderness quality assessments

6.11.1 Comment: The assertion that the impacts to remoteness from the restricted, seasonal points of mechanised access (eg: Lake Malbena) should be measured with the same weighting as permanent unrestricted access points such as public roads open 12 months of the year.

Response: This comment is not supported by the published literature, and the impact to remoteness has been addressed in full within the RFI. We note here, and previously in the RFI document, that *'the frequency of mechanised access should be weighted in considerations'*⁶. We also note that failing to consider the temporal and spatial character of remoteness impacts would fail to meet the requirements of impacts assessments under the EPBCA, which require consideration of spatial and temporal characteristics (Australia, 2013).⁷ No changes required to the RFI.

6.11.2 Comment: Comment disagrees with the methodological statement contained in the RFI document from the Parks and Wildlife Service, Tasmania (page 72, PWS correspondence 07/06/2021) that the NWI *'model will tend to overestimate impacts on the biophysical setting from built infrastructure as it assumes that any infrastructure will be visible given it assumes a flat topography and no vegetation screening'*.

Response: The statement made by the PWS is correct, and supported by the proponent. The PWS statement is also supported by Donohue (1998)⁸ whom confirms that the NWI 'assumes the land surface to be flat', and additionally illustrates that typical NWI modelling overstates the impact of built infrastructure compared to the use of viewshed analysis (case study area was the Overland Track, TWWHA). No change required to the RFI.

6.11.3 Comment #1: 'The proponent's attempt to suggest that wilderness protection is less important when the wilderness in question is located outside the Wilderness Zone is not supported by the Management Plan'.

Comment #2: 'The inference that impacts on wilderness values outside the Wilderness Zone are unimportant is invalid'.

Response: The proponent does not suggest or infer that impacts on wilderness values outside of the Wilderness Zone are unimportant, and rejects the notion. The proponent has further clarified this point in the RFI document, pages 84-85.

⁶ HAWES, M., DIXON, G. & BELL, C. 2018. Refining the definition of wilderness, Bob Brown Foundation, Hobart. Table 2, page 40.

⁷ AUSTRALIA, C. O. 2013. Matters of National Environmental Significance, Significant Impact Guidelines 1.1. Environment Protection and Biodiversity Conservation Act 1999. Commonwealth of Australia.

⁸ Randall Donohue, 1998. Adapting the National Wilderness Inventory to the Tasmanian Wilderness World Heritage Area. Pages 3-30

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6.11.4 Comment: The alleged “mapping error” relating to the claimed failure to take into account the presence of the Halls Hut on Halls Island in the National Wilderness Inventory (NWI) mapping of the area occurred in 1995 when the area was mapped by the Australian Heritage Commission, and was corrected in subsequent NWI maps prepared for the area in 2005 and 2015.

Response: The Hawes and Ling (2015) *‘Tasmanian Wilderness World Heritage Area Assessment of Wilderness Value’* which formed the basis of the TWWHA wilderness quality mapping and associated 2016 zoning clearly and directly identifies that the zoning was *‘likely incorrect’* in the 1995 modelling originally performed by the Australian Heritage Commission (see Table 7, pg16, Hawes and Ling 2015). Whether or not the wilderness quality mapping was corrected in 2005 is not clear, but also inconsequential to the overall issue. All submissions agree that the original 1995 wilderness quality mapping was deficient and incorrect in relation to Lake Malbena, and therefore the original 1999 zoning of Lake Malbena, which was carried through to the draft zoning in 2014, was not originally applied with the correct information at hand, at that time. Minor edits have been made to the RFI document at pages 31 and 32 to reflect this information.

6.12 TWWHA Management Plan 2016 related matters

Comment: Reference to, or use of IUCN protected-area categories within the RFI document are not relevant to the TWWHA Management Plan 2016.

Response: The proponent notes that IUCN categories are a global framework that classify protected areas according to their management objectives⁹. The categories are recognised and understood by international bodies, and are applied to the ‘component collective of reserves that form the Tasmanian Wilderness’ via declaration under Tasmania’s Nature Conservation Act 2002 (NCA, 2002)¹⁰. The use of IUCN Reserve Classes hand-in-hand with the TWWHA Management zonings within the RFI document provides additional clarity to a broad readership of interested parties, some of whom might not be familiar with the local vagaries of the TWWHA Management Plan zonation’s, but are well versed in IUCN management prescriptions. The use of IUCN categories hand-in-hand with the accompanying TWWHA Management Plan zonations within the RFI is entirely appropriate. The IUCN / ICOMOS Reactive Monitoring Mission 2015 acknowledges that the Nature Conservation Act 2002 (Tas) applies to the TWWHA as reserved land of different classes, or ‘protected area categories according to IUCN terminology’¹¹. Page 95 of the TWWHA Management Plan also identifies that ‘The basis for management of the cultural values are the...management objectives of the various reserve classes within the TWWHA’. We also direct readers to appendix 34 of the RFI, which contains the IUCN equivalent reserve listings in Tasmania, including TWWHA examples such as Cradle Mountain National Park which is listed as both category 1b and category II reserve equivalents. No changes required to the RFI.

Comment #1: Commentor remains of the view that helicopter access, other than that required for the purpose of servicing any approved standing camp, is incompatible with the concept of a Self-Reliant Recreation Zone.

Comment #2: The specifications for the Self-Reliant Recreation Zone (which includes Lake Malbena) include:

- *maintain, as far as possible, characteristics of remoteness and isolation; and*
- *retain a largely unmodified natural setting for a challenging experience...*

Both these objectives would be compromised by increased overflights and landings in the zone.

⁹ https://ec.europa.eu/environment/nature/natura2000/wilderness/pdf/Wilderness_register_indicator.pdf

¹⁰ <https://www.dceew.gov.au/sites/default/files/documents/tasmanian-wilderness-state-party-report.pdf>

¹¹ <https://whc.unesco.org/en/documents/140379> page 8 for instance.

Response: These comments / opinions are in direct contradiction to the provisions of the 2016 TWWHA Management Plan. Secondly, these comments are in direct conflict to the actual spectrum of recreational settings already found in the TWWHA Self Reliant Zone and Central Plateau Protected Area. Additional information has been added to sections 3f(i) & 3f(ii) of the RFI, below Fig 6 (page 29) in the RFI document addressing this topic, but in summary the current recreational spectrum in the Self Reliant Zone is from high-purism overnight bushwalkers on one end, through to day-users accessing the Self Reliant Zone via mechanised access including 4wd vehicles, motorbikes and motorised boats. The use of helicopters to access overnight experiences sits between these two ends of the existing spectrum of use and associated settings in the Self Reliant Zone, and is explicitly contemplated and allowed for within the Self Reliant Zone and Central Plateau Protected Area under TWWHA Management Plan 2016.

6.13 Qualifications of the proponent to provide the RFI materials

Comment: Mr Hackett has no formal qualifications or experience in acoustical engineering, parks planning or in the NWI assessment.

Response: Among a number of formal qualifications, Daniel Hackett is qualified with a Masters degree in Protected Area Governance and Management from the University of Tasmania (UTAS). This Master qualification (minimum 2 year) is described as including protected area ‘governance, planning and management’ and has ‘been led by a Steering Committee comprising of UTAS, Tasmanian Parks & Wildlife Service, Tasmanian Land Conservancy, Parks Victoria, Parks Australia, IUCN World Commission on Protected Areas, James Cook University Murdoch University and Charles Darwin University’. ‘The Course has been designed to meet international competencies for protected area planners specified by the IUCN World Commission on Protected Areas, with a particular focus on middle and senior governance and management roles’. Mr Hackett’s Masters thesis was ‘Incorporating overflight-derived wilderness soundscape impacts into the revised National Wilderness Inventory system: Case study, Tasmanian Wilderness World Heritage Area, Australia’, and he was included on the University of Tasmania Roll of Excellence.

Further to his Masters qualification, Daniel Hackett is a second year UTAS PhD Candidate (Environmental Studies) completing the research thesis *Investigating theoretical and policy frameworks behind the mapping, designation and management of wild places and soundscapes as wilderness*. Mr Hackett has been awarded a Fulbright Scholarship (Fulbright Tasmania Scholarship 2023) to specifically further wilderness soundscape and remoteness research in the USA, and his supervisory team now span two continents.

The above qualifications are in addition to Mr Hackett’s 20 year experience of offering protected area tourism products, including more than a decade operating a similar standing camp in the TWWHA, 10km’s south of Lake Malbena (2012-2022).

Daniel Hackett’s qualifications are both senior, and specialised to the field of expertise in which assessment materials have been presented. Specifically in relation to wilderness soundscapes, Daniel Hackett is thought to be the only academic currently working full time within the field in Australia. All RFI materials have been presented with supporting independent literature references and / or independent and transparent data and assessment methods.

6.14 Future proposed developments at this site

Comment: Ambiguity regarding future further development at Halls Island.

Response: There are currently no plans for further development being considered by the proponent. There are no 'Stage Two' developments or actions under consideration, and potential 'Stage Two' activities have been abandoned.

In response to specific concerns relating to the potential for future (hypothetical) developments and activities, and potential impacts to the recorded Aboriginal heritage site east of Lake Malbena, the proponent has newly proposed to implement and abide by a 1.5km radius (3km diameter) buffer around the known Aboriginal heritage site, precluding any future (hypothetical) operations based at Halls Island from occurring in this area at any time. This commitment has been added to the RFI document, including within the Section (5a) 'Consolidated list of impact mitigation and avoidance commitments', commitment number 35, pg. 106.

6.15 Risk of fire to on-island flora communities of significance

6.9.1 Comment: Halls Island supports a concentration of fire-sensitive flora species and vegetation communities that are rare and notable in this part of the TWWHA, where most of these features of OUV (under Criteria IX) have been destroyed by fire in the past 100 years.

Response: The proponent agrees that Halls Island contains fire-sensitive flora species and communities, as has been outlined extensively throughout the RFI documentation. However the comment that '*most of these features of OUV (under Criteria ix) have been destroyed by fire in the past 100 years*' is not factual, and is misleading. For instance, similar populations in terms of size, diversity and composition of fire-sensitive flora occur to the immediate south and east of Halls Island, including at nearby locations such as Lake Ina, Lake Kaljee, and the Central Walls (easily verified by the TasVEG database for instance). We acknowledge that fire has destroyed large communities of some specific fire-sensitive species on the Central Plateau, primarily related to a single fire event (originating from a deliberate burn) that burnt a large proportion of the plateau in 1960/61 (see Bowman et al, 2021 for instance).¹² The risk of fire has been thoroughly addressed and mitigated throughout the RFI document. No RFI changes required.

6.16 Pro-forma submissions and iterations received as comments

6.16.1 Comment: '*If approved, the Wild Drake proposal would undermine Australia's international World Heritage obligations*'.

Response: This statement has no basis in fact. The proponent has followed the precise assessment process required under all relevant state and federal government legislation and will continue to do so.

6.16.2 Comment: '*The Tasmanian Parks and Wildlife Service Wilderness Quality Assessment found that more than 1,150 hectares of high-quality wilderness would be degraded by this proposal, with a total of 4,900 hectares of wilderness adversely affected.*'

Response: This statement is incorrect, and represents disinformation. The PWS Wilderness Quality Assessment has been addressed in full in the RFI (see 4. F (vi) for instance, pages 71-72), including the fact that these figures apply to the action *before* any mitigation and avoidance measures are applied.

¹² https://link.springer.com/chapter/10.1007/978-3-030-71330-0_6

6.16.3 Comment: The proposal will have significant adverse impacts on threatened species, including the Tasmanian wedge-tailed eagle (*Aquila audax fleayi*).

Response: This comment has not been supported by any evidence, and is contrary to the expert evidence provided in the RFI documents, including the evidence supplied by Mr Nick Mooney, whom among other qualifications was a significant contributor to the Federal Threatened Tasmanian Eagles Recovery Plan.

6.16.4 Comment: The construction and use of huts within the Self-Reliant Recreation Zone of the TWWHA is not permitted

Response: The proposal is for a Standing Camp, which is unambiguously permitted by the TWWHA Management Plan 2016. No huts are proposed

6.16.5 Comment: Providing helicopter access for guests rather than just for resupply and maintenance (at 6.3.3, p 135) is in breach of the TWWHA Management Plan

Response: The above comment is a deliberate misquote of the TWWHA Management Plan page 135. The comment supplied above comes from a text box on page 135 of the TWWHA Management Plan relating to helicopter re-supplies. The quote itself does not exist, and has instead been paraphrased to change the wording and presumed intent of the Management Plan. The text box actually commences on page 134, where the first point states 'Within the Self-Reliant Recreation Zone landing sites are limited to a maximum of 5' before the text box continues (on to the next page) and details other matters such as the resupply of huts.

6.16.6 Comment: *Providing luxury accommodation and transport that goes against the objects of the Self-Reliant Recreation Zone (at 3.1.1.3, pp 62-63);*

Response: The proposed action is clearly within the permitted uses and recreational settings (objectives) of the Self-Reliant Recreation Zone. Succinctly, the proposed action is permitted in its entirety by the TWWHA Management Plan 2016, including the associated prescriptions permitting the landing of aircraft in the Self Reliant Recreation Zone, and permitted by the prescriptions relating to the operation of Standing Camps. The Self Reliant Recreation Zone contains a varied range of recreational opportunity settings ranging from motorised-accessed day trips, and motorised-accessed overnight trips on one end of the spectrum, through to overnight walk-in hiking on the other end of the spectrum. As demonstrated, the overnight trips facilitated by this proposal are well within the existing recreational opportunity settings of the SRRZ, and once again, explicitly permitted by the Management Plan Table of Use and supporting provisions as clearly outlined in the RFI. Comprehensively covered in the RFI document, pages 29-30 for instance.

6.16.7 Comment: *Activities and development do not protect the integrity of the wilderness of this part of the TWWHA, nor the quality of the recreational experience it provides (contrary to KDO 8.5 (at 8.2, p175).*

Response: The potential wilderness impact of the action are minimal and temporal, as outlined at length in the RFI. Elements of the action will result in improved naturalness (wilderness quality) outcomes to the sphagnum bogs and fens of the island, and improved scientific knowledge of the Tasmanian wedge tailed eagle, in addition to new funds to assist in managing the TWWHA, and protection and presentation of Tasmanian listed heritage. The recreational experience will offer high-quality interpretation, and add to the diversity of product and equity of access in the TWWHA.

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6.16.8 Comment: *'As the previous Commonwealth Environment Minister, Sussan Ley MP, acknowledged, the proposal will have a significant impact on the attributes of the TWWHA that "embodies, manifests, shows, or contributes to the Outstanding Universal Value and/or integrity of the property".'*

Response: This is a gross and deliberate misrepresentation of the discretionary Decision made by former Minister Sussan Ley MP. Succinctly, the former Minister Sussan Ley MP has never stated that the proposal *will have a significant impact* on the attributes of the TWWHA, and nor has any other Minister.

6.17 Comment received from the Parks and Wildlife Service Tasmania

Formal comment was received from the state regulator and land manager, the Parks and Wildlife Service Tasmania (PWS). Comments predominantly related to wording, typographical errors, and the provision of useful additional or updated details relating to usage of the TWWHA. All suggestions and corrections supplied by the PWS have been accepted and applied, and added to the primary RFI document:

6.17.1 TWWHA lease and licence statistics clarified page 10

6.17.2 Standing Camp design 'assessed as consistent' details clarified paragraph 3, page 11

6.17.3 Date of TWWHA extension (2012) corrected, pg 25

6.17.4 Wilderness zonation information clarified, paragraph 4, page 32

6.17.5 Reference to Hawes and Ling (2015) corrected to appendix 29 (footnote, page 32)

6.17.6 Standing Camp Policy 2016 cut-off date updated as footnote, page 35

6.17.7 Updated lease and licence statistics, page 139

6.17.8 Activities to be conducted during guided trip are outlined at paragraph 2, page 13.

Given the role of the PWS as the state regulator, and to ensure transparency to interested parties, the formal comment received from the PWS has been included as a new appendix to the primary RFI document (see appendices 44).

Document End