

To: James Barker, Assistant Secretary, Assessments and Governance Branch

**Referral Decision Brief – Halls Island Standing Camp, Lake Malbena, Tasmania  
(EPBC 2018/8177)**

Timing: 2 July 2018 - Statutory timeframe

<b>Recommended Decision</b>	NCA <input checked="" type="checkbox"/> NCA(pm) <input type="checkbox"/> CA <input type="checkbox"/>												
<b>Person proposing the action</b>	Wild Drake Pty Ltd												
<b>Controlling Provisions triggered or matters protected by particular manner</b>	<table border="0"> <tr> <td>World Heritage (s12 &amp; s15A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> <td>National Heritage (s15B &amp; s15C) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> </tr> <tr> <td>Ramsar wetland (s16 &amp; s17B) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> <td>Threatened Species &amp; Communities (s18 &amp; s18A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> </tr> <tr> <td>Migratory Species (s20 &amp; s20A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> <td>C'wealth marine (s23 &amp; 24A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> </tr> <tr> <td>Nuclear actions (s21 &amp; 22A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> <td>C'wealth land (s26 &amp; s27A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> </tr> <tr> <td>C'wealth actions (s28) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> <td>GBRMP (s24B &amp; s24C)* Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> </tr> <tr> <td>A water resource – large coal mines and CSG (s24D &amp; s24E) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> <td>C'wealth heritage o/s (s27B &amp; 27C) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> </tr> </table>	World Heritage (s12 & s15A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	National Heritage (s15B & s15C) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	Ramsar wetland (s16 & s17B) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	Threatened Species & Communities (s18 & s18A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	Migratory Species (s20 & s20A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	C'wealth marine (s23 & 24A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	Nuclear actions (s21 & 22A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	C'wealth land (s26 & s27A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	C'wealth actions (s28) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	GBRMP (s24B & s24C)* Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	A water resource – large coal mines and CSG (s24D & s24E) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	C'wealth heritage o/s (s27B & 27C) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>
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<b>Public Comments</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Number: 940 See <u>Attachment F</u>												
<b>Ministerial Comments</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Who: Department of Primary Industries, Parks, Water and Environment. See <u>Attachment G</u>												
<b>Recommendation/s:</b>  1. Consider the information in this brief, the referral ( <u>Attachment A</u> ) and other attachments. <div style="text-align: right;"><u>Considered</u> / Please discuss</div> 2. Agree with the recommended decision. <div style="text-align: right;"><u>Agreed</u> / Not agreed</div> 3. If you agree to 2, indicate that you accept the reasoning in the departmental briefing package as the basis for your decision. <div style="text-align: right;"><u>Accepted</u> / Please discuss</div>													

4. Sign the notice at Attachment H (which will be published if you make the recommended decision).

Signed / Not signed

5. Sign the letters at Attachment I notifying relevant parties of your decision.

Signed / Not signed

  
**James Barker, Assistant Secretary, Assessments and Governance Branch:**

Date: 31/8/18

**Comments:**

### **KEY ISSUES:**

The proposal is not likely to have a significant impact on matters of national environmental significance (MNES) including the:

- Values of the Tasmanian Wilderness World and National Heritage Area (TWWHA);
- Tasmanian Wedge-tailed Eagle (*Aquila audax fleayi*) (endangered); and
- Alpine *Sphagnum* Bogs and Associated Fens (endangered) threatened ecological community (TEC).

The proposal is locally contentious, with 132 individual public comments and 808 campaign submissions received on the referral.

### **BACKGROUND:**

#### **Description of the referral**

A referral was received on 29 March 2018. The action was referred by Wild Drake Pty Ltd (the proponent), which has stated its belief that the proposal is not a controlled action for the purposes of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The Department considered the proponent had not provided sufficient information on the referral to make a decision on whether the proposed action is likely to have a significant impact on matters of national environmental significance.

On 24 April 2018, you agreed, under section 76(1) of the EPBC Act, to suspend the statutory timeframe for making a decision under section 75 of the EPBC Act (the referral decision) to request additional information from the proponent (Attachment B1).

On 26 June 2018, the proponent provided a response to the additional information request which met the Department's requirements (Attachment B2), restarting the referral decision clock. The statutory timeframe for a decision on the referral was 2 July 2018.

On 5 July 2018, the additional information was published on the Department's website and public comment was sought for 10 days until 19 July 2018.

#### **Description of the proposal**

The proposed action is to build a standing camp and undertake a small-scale tourist operation on Halls Island, Lake Malbena within the TWWHA, approximately 20 km north-east of Derwent

Bridge. The proponent proposes to take six tourists, via helicopter from Derwent Bridge, to Halls Island. There will be a maximum of 30 trips per year.

Halls Island is within the Walls of Jerusalem National Park (Meander Valley region of the TWWHA). The national park border runs along the adjacent edge of Lake Malbena and the proposed helicopter landing site is on the mainland opposite Lake Malbena, in the TWWHA Central Highlands region and outside of the national park. Visitors will walk approximately 100 metres (m) from the helipad to the edge of Lake Malbena and will cross the lake in a row boat to Halls Island.

The proposed action involves the construction and operation of a standing camp over approximately 800m<sup>2</sup> consisting of three pre-fabricated twin-share accommodation structures, (approx. 4m x 3m), communal kitchen (approx. 8m x 4m), associated buildings with complete-capture pod systems for removal of grey water and sewage, gas or electric heating, board walks between huts where required and non-motorised transport on Lake Malbena. Helicopter activities relating to construction, maintenance and re-supply of the standing camp will occur within the standing camp footprint, utilising an area of sheet rock for depositing and collection of goods via slings.

The proposed tourist activities include kayaking, walking, cultural interpretation and wildlife viewing.

The referral describes the proposed action as 'Stage 1'. While not part of this referral, stage 2 activities are mentioned in the referral as proposed additional walking routes off-island and proposed cultural interpretation activities at an Aboriginal heritage site (not in the vicinity of the project area).

### **Description of the environment**

Halls Island, an area of approximately 10 ha, is located within Lake Malbena which is one of many lakes in the high alpine plateau area of the TWWHA. Vegetation comprises *Eucalyptus subcrenulata* forest and woodland (7.8 ha), highland low rainforest and scrub (1.18 ha), lichen lithosphere (0.18 ha), *Athrotaxis selaginoides* rainforest (0.03 ha) and *Sphagnum* peatland (0.6 ha). The *Sphagnum* peatland meets the definition for the EPBC Act listed endangered Alpine *Sphagnum* Bogs and Associated Fens TEC.

The proposed helipad is to be located on or nearby sheetrock on the adjacent mainland. There are also small patches of the TEC near the proposed helipad site.

There is an existing small wooden hut (to remain) on the island, built in 1954. This was used by the previous leaseholder and more recently by bushwalkers. The island has areas of level, exposed sheetrock and the standing camp structures are proposed to be located within this area. There is a natural sheetrock jetty that will be used as the boat jetty.

### **Tasmanian Wilderness World Heritage Area Management Plan 2016**

The Tasmanian Wilderness World Heritage Area Management Plan (2016) (TMP) ([Attachment C1](#)) has been developed in accordance with the Tasmanian *National Parks and Reserve Management Act* (2002) (NPRMA) and to meet the requirements of the EPBC Act with respect to management plans for World and National Heritage properties.

The Department reviewed the final draft Management Plan for the Tasmanian Wilderness World Heritage Area, finding that it is not inconsistent with the Australian World Heritage Management Principles as set out in Schedule 5 of the *Environment Protection and Biodiversity Conservation Regulations 2000* ([Attachment E2](#)). In addition to managing for World and National Heritage, the TMP also contains management measures for other matters such as recreational use, commercial tourism, hunting and fishing.

The TMP sets out what uses may occur within the Tasmanian Wilderness World Heritage Area (TWWHA). The TMP manages activities according to four area Management Zones; Visitor Service, Recreation, Self-Reliant Recreation (SRRZ) and Wilderness. The proposed project area is located within the SRRZ. Activities allowable within the SRRZ include commercial aircraft landing, bushwalking, camping, commercial tourism, standing camp accommodation, kayaking and non-motorised vessels.

### **Regulation of aircraft in the Tasmanian Wilderness World Heritage Area**

The TMP states that airspace over the TWWHA is not restricted and commercial and private flyovers for any purpose are allowed and do occur. Aircraft landings in the TWWHA are regulated through a licence under the *National Parks and Reserves Management Act 2002* (Tas) (NPRMA). All aircraft landings in the TWWHA, as well as the dropping of any article from an aircraft, require an authority issued by the Director National Parks and Wildlife (PWS), or a delegate of the Director; or a licence issued by the Minister or his delegate, being the Director of PWS. Commercial landings are permitted in all zones except the wilderness zone.

### **State and local government assessment process**

The PWS Reserve Activity Assessment (RAA) is the assessment process for activities that have a potential to impact on the values, including non-OUV values, of the TWWHA. PWS apply conditions to avoid or manage potential impacts on TWWHA values and to ensure the project is consistent with the TMP. The proponent holds a lease over Halls Island. The lease and PWS licence conditions require PWS RAA approval before commencing a proposed activity (Attachment B2).

The proponent's RAA (Attachment A) was for stage 1 (this referral) and stage 2 (proposed Indigenous cultural interpretation visits and additional walking routes) is to be progressed separately. The RAA process requires referral of the project under the EPBC Act. The proponent's project has received draft RAA approval for stage 1 which includes all developments and activities on Halls Island, helipad, walking route between the helipad and Halls Island, the use of non-motorised watercraft on Lake Malbena and the helicopter flight path.

The proponent has not yet commenced the Central Highlands Council Development Application process. The RAA process will be finalised after the EPBC Act referral decision, and assessment if required has been completed, and the DA has been obtained.

### **RECOMMENDED DECISION:**

Under section 75 of the EPBC Act you must decide whether the action that is the subject of the proposal referred is a controlled action, and which provisions of Part 3 (if any) are controlling provisions for the action. In making your decision you must consider all adverse impacts the action has, will have, or is likely to have, on the matter protected by each provision of Part 3. You must not consider any beneficial impacts the action has, will have or is likely to have on the matter protected by each provision of Part 3.

The Department recommends that you decide that the proposal is not a controlled action, because there are not likely to be significant impacts on any controlling provisions. The reasons for this recommendation are detailed further below.



## **PROTECTED MATTERS THAT ARE NOT CONTROLLING PROVISIONS:**

### **Listed threatened species and communities**

The Department's Environment Reporting Tool (ERT) indicates that a total of 20 species and 1 ecological community may occur within 5 km of the proposed action (see the ERT report at Attachment D). Based on the location of the action, likely habitat present in the area of the proposed action, the Department considers that impacts potentially arise in relation to the following matters.

#### Tasmanian Wedge-tailed Eagle (*Aquila audax fleayi*) - Endangered

##### *Species information*

The Tasmanian Wedge-tailed Eagle *Aquila audax fleayi*, is endemic to Tasmania and is known to occur in all habitats throughout the state. A population decline is inferred due to loss of nesting habitat, nest disturbance from land clearance and other inappropriate land management practices and from unnatural mortality, including persecution. Further information can be found in the Threatened Tasmanian Eagles Recovery Plan: 2006-2010 at <http://www.environment.gov.au/resource/threatened-tasmanian-eagles-recovery-plan-2006-2010>.

There is no listing advice or Approved Conservation Advice for the species.

##### *Proposed action area*

The locations of most active Wedge-tailed Eagle nests are known and recorded by the Tasmanian Department of Primary Industries, Parks, Water and Environment (DPIPWE). Mapping included in the referral indicates known nesting sites approximately 2 km from Halls Island and 4 km from the proposed helicopter flight route.

##### *Avoidance and mitigation measures*

The Threatened Tasmanian Eagles Recovery Plan does not specifically identify management actions for helicopter flights, but does recommend implementing breeding season buffers of 500m and 1000m in line-of-sight to protect nests from potential disturbance.

PWS has identified management measures to avoid impacts to the Wedge-tailed Eagle from helicopter flights (Attachment C2). These include:

- not circling around or hovering near eagles nests or potential nests;
- to fly as high, swiftly and directly over the nests as possible during breeding season (July – January); and
- to avoid flying within 1,000 m of the nests, horizontally or vertically, particularly from July – January.

PWS has developed *Fly Neighbourly Advice* (FNA) prescriptions to reduce the likelihood of over-flights causing disturbance. FNAs are a voluntary code of practice negotiated between aircraft operators and authorities to reduce disturbance caused by aircraft.

To further avoid disturbance impacts, the proponent has undertaken to implement FNA prescriptions to protect the Wedge-tailed Eagle (Attachment B2) and take additional measures which include:

- no flights within 1km line-of-sight of known eagles nest and eagles observed in operational areas to be avoided;
- helicopter flights will not include a 'viewing' of the nest; and

- adopt the flight route as prescribed in the Wedge-Tailed Eagle Assessment provided with the referral information. The route avoids interactions with known nesting sites and utilises an area with a low probability of eagle nests.

### *Conclusion*

The Department notes that there are currently no known eagle nests within 1 km of the flight route and the proponent's FNA provides measures to reduce the likelihood of disturbance to the species. The plan states that if new nests become known, the flight path will maintain a 1 km buffer to also avoid those nests.

With reference to the Department's Significant Impact Referral Guidelines (Matters of National Environmental Significance, Significant impact guidelines 1.1, *Environment Protection and Biodiversity Conservation Act 1999*), the Department considers the proposed action is unlikely to adversely affect habitat critical to the survival of the species or disrupt the breeding cycle of a population. The Department concludes that the proposed action is unlikely to have a significant impact on the species.

### Alpine *Sphagnum* Bogs and Associated Fens - Endangered

#### *Species information*

The Alpine *Sphagnum* Bogs and Associated Fens TEC is described in the Approved Conservation Advice at <http://www.environment.gov.au/biodiversity/threatened/communities/pubs/29-conservation-advice.pdf>.

#### *Proposed action area*

There are patches of this TEC on the eastern half of Halls Island and near the proposed helicopter landing site. The area proposed for the helicopter landing is within an elongated natural clearing, approximately 400 m x 50-80 m. The north-western end and central part of the clearing is predominantly covered by the TEC, the south-east end is exposed flat bedrock, sedgeland and heathland.

The Approved Conservation Advice for the Alpine *Sphagnum* Bogs and Associated Fens ecological community identifies the main threats to the TEC as fire, exotic weed invasions, grazing and trampling by non-native animals, tourism and increased human infrastructure.

The proponent has identified potential impacts from the proposed activity to be from fire, trampling, weeds, construction and infrastructure location.

#### *Avoidance and mitigation measures*

The Approved Conservation Advice includes a range of management measures to reduce threats including developing and implementing appropriate management regimes to prevent further loss of functionally important species and community integrity, ensure development activities do not result in adverse impacts and prevent or minimise changes to water flows which may increase run off or sediment.

To avoid impacts, the proponent has provided measures to avoid and mitigate potential impacts to the TEC in the Protected Matters Environmental Management Plan (Attachment A). These measures include:

- minimising impacts from trampling by avoiding walking tracks through the TEC, and installing raised, perforated boardwalks where required;
- siting of the helicopter landing site away from the TEC and siting the standing camp on an area of hard-wearing, exposed bedrock or in *Eucalyptus subcrenulata* forest and

woodland (considered by the proponent as a common and resilient community) with no excavations or changes to water-courses;

- implementing a range of hygiene measures during construction and operations to ensure there is no spread of disease or weeds; and
- minimising threats from fire by providing electric or gas heating with no open flames, and not storing aviation fuel or undertaking any helicopter refuelling operation at the Hall's Island helipad or nearby.

The Department considers that the proposed management measures take into consideration the mitigation measures identified in the Approved Conservation Advice. The Department considers that assuming these proposed measures are implemented and adhered to, risks resulting from trampling and construction, invasive species and disease and fire should be adequately mitigated.

The Department's Heritage Branch considered that if the proposed measures are implemented and adhered to, vegetation trampling impacts on Hall's Island and at the helicopter landing site should be effectively mitigated (Attachment E1).

#### *Conclusion*

With reference to the Department's Significant Impact Guidelines, the Department considers that the proposed action is unlikely to result in a substantial reduction in the quality or integrity of the TEC, or result in the introduction of damaging invasive species or disease. The Department concludes that the proposed action is unlikely to have a significant impact on the TEC.

#### Other listed species

Spotted-tailed quoll (*Dasyurus maculatus*) – Vulnerable, Tasmanian devil (*Sarcophilus harrisii*) – Endangered, Masked owl (*Tyto novaehollandiae*) – Vulnerable

Based on their desk top survey, the proponent considered there was the potential for the above listed fauna species to be present on Halls Island. The flora and fauna assessment of the area failed to detect the species. The proponent considers these species have average home range sizes that are too large for the island to support permanent populations, there is an absence of available nesting and denning opportunities, if any of these species use the island it would only be occasionally for foraging, and it is unlikely that the island would have sufficient prey to make raising young viable.

#### *Conclusion*

The Department considers the proposal site is unlikely to provide suitable denning or foraging habitat sufficient to support a population of the above species.

With reference to the Department's Significant Impact Guidelines, the Department considers that the proposed action is unlikely to adversely affect habitat critical to the survival of the above species. The Department considers the proposed action is unlikely to have a significant impact on the above species.

#### **Listed migratory species**

The proponent's flora and fauna assessment concluded that of the eight migratory species listed in the ERT (Attachment D), only the Japanese snipe (*Gallinago hardwickii*) and the satin flycatcher (*Myiagra cyanoleuca*) have a moderate likelihood of utilising the island. The Japanese snipe is a non-breeding migratory species that may use the on-island bogs for foraging. The Satin-flycatcher may roost or nest in the *E. subcrenulata* forest.

The Department considers the proposal area does not provide important habitat that would support an ecologically significant proportion of a population of migratory species. A significant

impact on listed migratory species as a result of the proposed action is therefore considered unlikely.

### **World Heritage properties**

The Tasmanian Wilderness is inscribed on the World Heritage List under four natural (vii, viii, ix and x) and three World Heritage Area cultural (iii, v, vi) criteria. Further information on the Tasmanian World Heritage area, including listing criterion, can be found at <http://www.environment.gov.au/heritage/places/world/tasmanian-wilderness>.

The Department notes that when the Tasmanian Wilderness was listed in 1982, a Statement of Outstanding Universal Value was not required. A Statement of Outstanding Universal Value is the key reference for the future protection and management of the property. The Australian Government is working with the Tasmanian Government and technical advisory bodies to develop the Statement of Outstanding Universal Value. In the meantime, examples of World Heritage values that contribute to the property's Outstanding Universal Value are identified under each criterion.

The Department has identified a range of listed values that are relevant to the proposed action, which have been used to guide the significant impact assessment:

- **Cultural- iii, iv and vi:** disturbance impacts to Indigenous archaeological sites from construction and operations;
- **Natural- vii:** impacts associated with noise from the helicopter transporting and visual impacts from the standing camp;
- **Natural- viii, ix and x:** impacts to ecological and biological systems from trampling of vegetation, unmanaged fires, introduction of pests, weeds and pathogens, sediment and erosion, and contamination of Lake Malbena from construction and operations.

### **Cultural criterion**

**Criterion (iii) Bear a unique or at least exceptional testimony to a cultural tradition or to a civilisation which is living or which has disappeared.**

**Criterion (iv) An outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history.**

**Criterion (vi) Directly or tangibly associated with events or living traditions, with ideas or with beliefs, with artistic and literary works of outstanding universal significance.**

### *Values*

The listed Values relevant to Criterion (iii), (iv) and (vi) and the proposed development are archaeological sites, including:

- Pleistocene sites that are unique and of great antiquity;
- sites showing how people practised their way of life over long time periods; and
- sites that demonstrate the adaptation and survival of human societies to glacial climatic cycles and periods of long isolation from other communities.

### *Potential impacts on Indigenous heritage*

Based on advice from Aboriginal Heritage Tasmania (AHT) provided in the referral, the proponent considers there is a low probability of Aboriginal heritage being present on or adjacent to Halls Island. The Department notes that the stage 2 proposal to undertake cultural interpretation activities at an Aboriginal heritage site (away from the proposal site) is not part of the referred action.

## *Consultation*

The referral states that extensive consultation has been undertaken with relevant stakeholders as part of the PWS RAA process, including the Aboriginal community groups, Tasmanian Aboriginal Centre and Tasmanian Regional Aboriginal Community Alliance. The results of this consultation are included in the PWS RAA documentation supplied with the referral and it is noted that both organisations were supportive of the proposal.

During the referral stop clock period, the proponent provided a letter from AHT ([Attachment B3](#)). The letter noted there was a low probability of Aboriginal Heritage sites being present and encouraged the proponent to formally contact, engage and consult with the Aboriginal Heritage Council (Tasmania) (AHC) and the Aboriginal community on the proposal and any proposed plans for activities, including site visits. The AHC is a statutory body that provides advice and recommendations to the Director of National Parks and Wildlife, the Minister for Aboriginal Affairs and stakeholders on the protection and management of Aboriginal heritage in Tasmania. The PWS RAA for stage 2 concluded that the proponent must formally engage with the AHC.

On 6 July 2018 the proponent provided a presentation to the AHC on both the stage 1 (this referral) and stage 2 (not referred) proposed activities. After the presentation the AHC made a submission to the Department ([Attachment F2](#), submissions 51a and 51b). The AHC committed to providing the proponent with a list of contact details of Tasmanian Aboriginal community organisations for consultation. In addition, the AHC expressed concerns about the proposed cultural interpretation site visits that the proponent hoped to undertake in the future and considered the project should not be approved until there has been a thorough Aboriginal cultural values and significance assessment. The cultural site visits referred to by the AHC are those that form part of the stage 2 proposal, are not part of this referral and have not been approved to proceed in the PWS RAA.

## *Avoidance and mitigation measures*

The referral includes *An Unanticipated Discovery Plan* which will be implemented during construction and operation of the project. The referral states this is a requirement under their RAA conditions for the management of unanticipated discoveries of Aboriginal relics ([Attachment B2](#)). The *An Unanticipated Discovery Plan* includes ceasing disturbance works in the event Aboriginal relics are found, the application of temporary buffers and assessment by suitable experts.

In the additional information, the proponent has committed to the implementation of an Indigenous Heritage – Protected Matters Environmental Management Plan (IH EMP) ([Attachment A](#)). The objective of the IH EMP is to ensure that Aboriginal heritage is treated sensitively and appropriately and protected from potential impacts. The IH EMP includes:

- implementation of the requirements of An Unanticipated Discovery Plan;
- continued engagement and consultation with the Aboriginal community;
- siting of the standing camp in area of low probability of Aboriginal Heritage being present; and
- no ground disturbance or excavations.

## *Conclusion*

The Department considers that the project site is unlikely to contain cultural heritage and the measures proposed in the IM-EMP will ensure impact is avoided should relics be found during construction or operations. The Department considers that the proposed action is unlikely to restrict or inhibit existing use of a cultural or ceremonial site; permanently diminish the cultural value for a community or group to which its values relate; remove, damage or substantially



disturb cultural artefacts, or ceremonial objects or permanently damage or obscure rock art of other cultural or ceremonial features with World heritage values.

### **Natural criterion**

#### **Criterion (vii) - Contains superlative natural phenomena, or areas of exceptional natural beauty and aesthetic importance.**

##### *Values*

The listed Values relevant to Criterion (vii) and the proposed tourism development are view fields and sites of exceptional natural beauty associated with:

- the relatively undisturbed nature of the property; and
- the scale of the undisturbed landscapes.

##### *Avoidance and mitigation- noise impacts*

The referral states that usage levels have been designed to minimise and limit use of helicopter travel to mitigate point impacts to other users in the TWWHA. The proponent proposes to mitigate the potential noise and visual impact of helicopter usage on other users of the TWWHA through:

- flying at a heights of greater than 1000m altitude where possible;
- using the PWS prescribed flight path which avoids known walking routes and the Wilderness Zone;
- following the eastern periphery of the TWWHA;
- ensuring that the pilot and passengers note other users and implement avoidance measures;
- siting the helicopter land site within the natural clearing that acts as a small amphitheatre with surrounding woodland to maximize sound attenuation during start-up and set-down and minimise noise impact; and
- restrict annual bookings to 30, with a maximum of six customers per booking.

The above measures are contained in the Wilderness Characteristics – Protected Matters Environmental Management Plan (WC EMP) provided in the referral. Additionally, the FNA, discussed above, contains further management measures. The proponent has calculated the amount of time a person would be exposed to helicopter noise if directly under the flight path as a maximum of 2 minutes. By avoiding the known walking paths, the proponent considers it is unlikely that there will be users of the TWWHA directly under the flight path.

##### *Avoidance and mitigation – aesthetic values*

The proponent's Lease and Licence conditions ([Attachment B2](#)) require that the standing camp design must minimise environmental impacts through the following:

- appropriate footprint and design for the three accommodation huts and the communal kitchen hut;
- use of low-visibility materials for external surfaces (i.e. timber and steel materials in muted bush tones); and
- the retention of existing vegetation and topography.

The proponent has incorporated these measures into their WC EMP and included the following additional measures:

- siting to provide further concealment and restrict possible view field;

- utilising sympathetic building material selection and avoiding reflective surfaces;
- final design to be approved by the State Minister (Lease and licence condition);
- any external lighting will utilise red colour spectrum where possible to avoid potential for light transmission beyond the standing camp area; and
- infrastructure shall be designed to be completely removable.

The Department notes that there are no walking paths near or within sightline of the proposed development on Halls Island. The Department further notes that a line of sight to the proposed standing camp site is likely only possible from a boat on Lake Malbena and this may still be concealed by the existing vegetation.

#### *Conclusion*

The Department considers that as the flight path is not over known walking paths, the total flight time for each trip is a maximum of 12 minutes, the high flying path and the short duration of noise exposure to points on the ground, that potential noise impacts on aesthetic values will be avoided or mitigated.

The Department considers that with the WC EMP in place, together with the naturally secluded siting and likely lack of visibility to other TWWHA users, that visual impacts will be avoided. The Department considers there is unlikely to be a significant impact from the proposed action on the exceptional natural beauty and aesthetic importance of the TWWHA.

#### **Natural criterion (continued)**

**Criterion (viii) Outstanding examples representing major stages of earth's history, including the record of life, significant ongoing geological processes in the development of landforms, or significant geomorphic or physiographic features.**

**Criterion (ix) - Outstanding examples representing significant ongoing ecological and biological processes in the evolution and development of terrestrial, freshwater, coastal and marine ecosystems and communities of plants and animals.**

**Criterion (x) - Contain the most important and significant natural habitats for in-situ conservation of biological diversity, including those containing threatened species of outstanding universal value from the point of view of science or conservation.**

#### *Values*

Values relevant to Criterion (viii), (ix) and (x) that occur within the proposed tourism development area are:

- the development of peat soils and blanket bogs as discussed for the TEC;
- endemic members of large Australian plant families. The proponent's survey identified Tasmanian endemic species belonging to the large Australian plant families Epacridaceae, Myrtaceae, Proteaceae on Halls Island;
- conifers of extreme longevity. The proponent's survey identified the presence of *Athrotaxis cupressoides* (pencil pine) and *Athrotaxis selaginoides* (king billy pine). Of particular note is an area of Sphagnum peatland adjacent to rainforest communities that contains emergent pencil pines;
- examples of evolution in mainland mammals. The proponent's survey noted the presence of the Tasmanian sub-species of Bennett's wallaby - *Macropus rufogriseus* and common ringtail possum - *Pseudocheirus peregrinus*; and

- undisturbed catchments, lakes and streams- Lake Malbena. Lake Malbena supports a large community of endemic species.

The Bennett's wallaby and common ringtail possum are not listed species and as the proposed action does not involve any land clearing or other activity likely to remove their habitat, the Department considers it is unlikely that there are potential impacts in relation to these mammals from the proposed action.

#### *Avoidance and mitigation*

The proponent has provided avoidance and mitigation measures to avoid or reduce trampling, fire risk and introduced species or disease impacts. These are the same as described for the TEC above. The proponent will not be excavating for construction and will be making no changes to watercourses. The boat jetty is a natural rock slab and this will avoid eroding soil at the lakes edge.

#### *Potential impacts to Lake Malbena*

There is the potential for impacts on water quality of Lake Malbena from sediment and erosion during construction and operations, and contamination from sewage, greywater, garbage and boat fuel.

#### *Avoidance and mitigation*

Sediment and erosion risks will be avoided as no excavations or clearing will be required for construction of infrastructure. The boat landing site will be on a natural jetty formed by exposed protruding bedrock and soil will not be disturbed.

The proponent has included measures to avoid contamination of the surrounding environment, including Lake Malbena. These measures are included in the Construction- Protected Matters Environmental Management Plan (C EMP) and the WC EMP including through:

- installation of complete-capture sewage and greywater pods;
- back-loading of greywater with each trip, for disposal outside of the TWWHA;
- annual collection of sewage in pods to be emptied off site;
- ensuring that all rubbish generated is properly collected and stored in a manner that it cannot be accessed by animals and properly disposed of at an authorised waste disposal site at the end of each stay;
- use of recyclable, compostable and/or reusable containers and wrappers wherever possible, no use of plastic bags or single use plastic bottles; and
- minimal ground disturbance and no excavations or changes to water-courses.

#### *Conclusion*

The Department considers that as potential contamination from greywater, sewage and rubbish will be appropriately managed and there is no proposal for ground disturbance or changes to water-courses, there is unlikely to be a significant impact on Lake Malbena.

#### Heritage advice

The Department's Heritage Branch has provided advice on the potential impacts of the proposed action on the World Heritage values for which the TWWHA has been listed (Attachment E1).

The Heritage Branch concludes that if the proposed avoidance, mitigation and management measures are implemented and adhered to, impacts to cultural heritage values, view fields and sites of exceptional natural beauty associated with the TWWHA, and impacts associated with

trampling, fire, and the introduction of pests, weeds and pathogens, should be effectively mitigated.

#### Conclusion for World Heritage properties

With reference to the Department's Significant Impact Guidelines, the Department considers that the proposed action is unlikely to cause one or more of the World Heritage values to be lost, degraded or damaged or notably altered, modified, obscured or diminished. The Department concludes there is unlikely to be a significant impact to the values of a World Heritage property.

#### **National Heritage places**

The values for the Natural Heritage Place are substantially the same as for the WHA. The Department considers that the avoidance and mitigation measures described for the WHA will also avoid or mitigate potential impacts on National Heritage values. The Department concludes that there is unlikely to be a significant impact on the values of a National Heritage place.

#### **Other Matters of National Environmental Significances**

<b>Ramsar Wetlands</b>	The ERT did not identify any Ramsar listed wetland of international importance within or adjacent to the proposed action area, therefore this controlling provision does not apply.
<b>Commonwealth marine environment</b>	The proposed action does not occur in the vicinity of a Commonwealth marine environment therefore this controlling provision does not apply.
<b>Commonwealth action</b>	The referring party is not a Commonwealth agency, therefore this controlling provision does not apply.
<b>Commonwealth land</b>	The proposed action is not being undertaken on Commonwealth land therefore this controlling provision does not apply.
<b>Nuclear action</b>	The proposed action does not meet the definition of a nuclear action as defined in the EPBC Act therefore this controlling provision does not apply.
<b>Great Barrier Reef Marine Park</b>	The proposed action is located in Tasmania, therefore this controlling provision does not apply.
<b>Commonwealth Heritage places overseas</b>	The proposed action is not located overseas, therefore this controlling provision does not apply.
<b>A water resource, in relation to coal seam gas development and large coal mining development</b>	The proposed action is not a coal seam gas or a large coal mining development, therefore this controlling provision does not apply.

#### **SUBMISSIONS:**

## **Public submissions**

The proposal was published on the Department's website on 29 March 2018 and public comments were invited until 17 April 2018. 50 public submissions were received on the referral during the public comment period. Four were received after the public comment period ([Attachment F1](#)).

No comments are supportive of the project in its current form. Many of the submissions raised issues relating to State Government regulatory processes, stage 2 of the proposal, the revision of the TMP and other matters that are outside the consideration of this recommendation, such as continuing access to the existing hut for bushwalkers, opposition to flights in by helicopter, concern that approving the project would be contrary to the public's concept of wilderness and general opposition to more commercial tourist operations within the TWWHA. Key matters relevant to MNES raised in submissions are:

- helicopter noise;
- impacts on the Wedge-tailed Eagle from the helicopter flight path;
- potential increased risk of fire;
- damage to the sensitive bogs and vegetation from trampling, construction of infrastructure and the helipad;
- erosion from the boat landing site;
- impacts on physical wilderness values;
- impacts from the standing camp to visual amenity and undisturbed nature of the environment; and
- impacts to aboriginal cultural heritage – mostly relating to stage 2 (not referred).

The additional information provided by the proponent was published on the Department's website on 5 July 2018 and public comments were invited until 19 July 2018. 78 individual and 808 campaign submissions were received ([Attachment F2](#)). The matters raised were substantially the same as in the initial comment period.

The Department notes that in the additional information the proponent has committed to allowing access to the existing hut, consistent with the amount of usage as recorded in the visitor's book kept in the hut.

The Department has considered relevant matters raised in public submissions in making this recommendation and considers that these matters have been adequately addressed in the referral.

## **Comments from Commonwealth Ministers**

By letter dated 29 March 2018, Senator, the Hon Nigel Scullion, Minister for Indigenous Affairs, was invited to comment on the referral. No comments were received in response to that invitation.

## **Comments from State/ Ministers**

By letter dated 29 March 2018, the following State ministerial delegates were invited to comment on the referral:

- Wes Ford, Director, Environmental Protection Authority, as delegated contact for the Tasmanian Minister for Environment, the Hon Elise Archer MP; and



- s22, Department of Primary Industries, Parks, Water and Environment (DPIPWE), as delegated contact for the Tasmanian Minister for Environment, The Hon Elise Archer MP.

On 6 April 2018, Ms Alice Holeywell-Jones, (Acting General Manager, Natural and Cultural Heritage) responded on behalf of DPIPWE. The key matters raised were:

- the proposed management measures should be sufficient to minimise impacts from the increased number of visitors to the Halls Island;
- it is recommended to be clearly stated that no helicopter refueling operations or fuel storage be undertaken on site;
- no sewage, grey water and sediment be allowed to enter the lake or streams;
- where possible, helicopters do not fly within 1 km line-of-sight of known eagles nests during the breeding season (June to January inclusive) and specifically that tours do not include a 'viewing' of a nest; and
- the proponent should implement a biosecurity hygiene plan.

The Department considers that the issues raised by DPIPWE are addressed in the management plans provided by the proponent in the referral.

On 9 April 2018, Mr Ford responded and noted that he did not intend to provide any comment on the referral and the referral would not be assessed under the bilateral agreement between the Queensland and Australian governments (Attachment G1).

## **OTHER MATTERS FOR DECISION-MAKING:**

### **Significant impact guidelines**

The Department has reviewed the information in the referral against the *EPBC Act Policy Statement 1.1 Significant Impact Guidelines – Matters of National Environmental Significance* (December 2013) and other relevant material. While this material is not binding or exhaustive, the factors identified are considered adequate for decision-making in the circumstances of this referral. Adequate information is available for decision-making for this proposal.

### **Precautionary principle**

In making your decision under section 75, you are required to take account of the precautionary principle (section 391). The precautionary principle is that a lack of full scientific certainty should not be used as a reason for postponing a measure to prevent degradation of the environment where there are threats of serious or irreversible environmental damage.

s22

s22

Director  
Queensland North Assessments  
Assessments and Governance  
Ph: 6274 s22

s22

Queensland North Assessments  
Assessments and Governance  
Ph: 6275 s22

## **ATTACHMENTS**

A: Referral documentation

B: Additional Information

B1: Request for additional information

B2: Addition information supplied (dated June 2018)

B3: Letter from AHT

C: Supporting documents

C1: TWWHA Management Plan (2016)

C2: PWS FNA Freycinet Peninsula

D: ERT

E: Heritage advice

E1: Advice on additional information

E2: Comment on TWWHA Management Plan (2016) review

F: Public submissions

F1: Public comment period 1

F2: Public comment period 2

G: Ministers comments

G1: EPA

G2: DPIPWE

H: Decision notice FOR SIGNATURE

I: Letters to the proponent & Ministers FOR SIGNATURE

## PWS Reserve Activity Assessment - Level 2 to 4

G18/613-01  
113175  
cc - 110850PRO

## Activity Title: RAA Halls Island proposed standing camp, helipad and guided tourism EOI within Tasmanian Wilderness World Heritage Area.

### RAA Administration and Tracking

#### Important Dates and Information

Start Date (Date RAA submitted)	29-09-2017	Decision Required by	Oct 2017
Return comments on RAA to	Andrew Crowden, Regional Planner North		
Hobart office file Number	113175	Region file Number	
PWS Cost Centre (if assigned)			

### Step 1. Activity Summary

This step states the details of the proposed activity. Enough information is provided so that someone unfamiliar with the activity will gain a clear idea of what is involved and where the activity will occur. Use the Maplink, Natural Values Atlas and PWS Site Register reports to help in filling out this step (see RAA Manual).

#### 1.1 Contact Details (who)

Initiating Organisation	Daniel Hackett		
Initiating Person	Daniel Hackett	Phone contact:	s47F ?
Initiating Person Email	s47F		
Initiating Person Address			
PWS Contact Officer	Andrew Crowden	Phone contact:	s22
PWS Contact Officer Email	s22		

#### 1.2 Location Information (where)

Location of Activity	Halls Island, Lake Malbena		
Reserve Name & Tenure	TWWHA (Central Plateau Conservation Area and Walls of Jerusalem National Park)		
Grid Ref (GDA): Easting	441994	Northing	5355399
PWS Field Centre	Derwent Bridge	PWS Region	NW & N
IMS/RSF Site Number	SNGWT41494	IMS/RSF Site Name	Central Plateau CA NMVS (GWT)
	SWLSC38953		Walls of Jerusalem NP NMVS (LSC)
Map. Number (1:25000)	4435	Map Name (1:25000)	Olive

### 1.3 Description (what)

#### Background information – Halls Island and Reg Hall

Reg Hall was one of the first European bushwalkers to regularly visit the Walls of Jerusalem, with his first visit to the area in the early 1920's.

More than twenty of the Walls Of Jerusalem place names (including Pool of Siloam, Damascus Gate, West Wall) were attributed to Reg Hall, and the first widely used walking maps of The Walls of Jerusalem, complete with topography were also developed by Reg. These remained in use by the main bushwalking clubs till the advent of aerial-mapping in the mid-1950's and the first government produced topographical maps. It is on these maps that Reg allocated the formal place names as we know them today.

The area around Ling Roth Lakes was Reg's favourite on the plateau, and it was during a walk (circa 1950) from the central Walls to Ling Roth Lakes that he first spotted Halls Island, the perfect location for a hidden hut. After hitching a ride on the government aerial survey plane, Halls Island was confirmed as the perfect place for a long-planned hidden hut, and a submission was made to the Lands Department to purchase the island. This bid was blocked by the Hydro, who had plans to dam the lake, and a lease was instead issued.

The hut-building process commenced circa summer 1954, with bulky materials palletised back in Launceston, before being fitted with long poles and bright orange flagging—not unlike the fibreglass flagpoles that use to adorn kids' bicycles. The purpose of these were simple: so that the caches of building materials could be found again, after they were heaved out the side-door of plane, overhead of Lake Malbena.

Over the course of following two summers' the hut was completed with the aid of a local shepherd (an employee of another famed bushman, Dick Reed), and two others. Pencil-pine was milled on-site for framing, while the pallets of timber and metal sheeting formed the tongue-and-groove flooring, trademark barn-style door, and pitched-roof with large skillion. A very effective open-fireplace, stacked with drystone wall inside of a steel and timber chimney, and a second small-skillion at the back to house a portable kayak completed the design. This hut would become the first hut to ever be designed and built in the Walls of Jerusalem area specifically for recreation, and the design would go on to be used in subsequent huts at Lake Meston, and Junction Lake.

The island has now been in use for recreation, for in excess of sixty years. The approach routes to the island were formed from horse and haflinger use, over a period of thirty years or more, and floatplanes were used for access on numerous occasions by Reg Hall during the 1970's.

Jump forward sixty years, and Daniel and Simone Hackett are now the owners & custodians of Halls Hut, after Reg's elderly daughter Liz McQuilken sought them out as new owners. The current tourism proposal has been submitted with her blessing.

Halls Island itself is a location with previous and existing European human activity and built heritage, and obvious long-term disturbance.

## **Proposal: To develop and operate a luxury Standing Camp on Halls Island, Lake Malbena.**

The primary theme of the development is one of cultural immersion, built around the Reg Hall and Walls of Jerusalem National Park narrative. This theme is to be enhanced by world-class interpretation of the listed Outstanding Universal Values found in the World Heritage area, and the wider Aboriginal cultural landscape.

Key target markets will be discerning travellers looking for new discoveries, deep heritage and strong narratives, disconnection from the outside world, and privileged access to Tasmania's wilderness.

Activities will include kayaking, hill-climbing, bushwalking, cultural interpretation, wildlife viewing, and the chance to participate in choreographed field trips with guest-experts in the fields of science, art and culture. On island activities will include continuing with the sixty year history of poetry and art on the island, astronomy, botany, bird watching, astronomy and flora and fauna interpretation.

The development is aimed at the very top of the tourism market – a market only tapped in Tasmania by Safire. Ensuring that the outcomes are sensitive to the environmental and social expectations of operations is the TWWHA (Tasmanian Wilderness World Heritage Area), the scale will be extremely low: 25-30 trips annually, with just 6 customers per trip.

### **1.3.1 Camp Design**

The infrastructure would be erected for 12 months per year (to minimise impacts arising from seasonal removal).

The operation would run seasonally from approximately November to May annually, and provide for a high-level of visitor comfort and environmental interpretation

The camp design would include:

- Three twin-share accommodation buildings, of approximately 3mx3m.
- One central kitchen / communal hut, of approximately 7mx4m
- Associated toiletry building(s), designed as complete-capture pod systems for removal of all sewage and grey-water.
- All buildings will be of sympathetic design and scale reflecting key features of the existing Halls Hut, and will incorporate:
  - Minimal internal 12v lighting, no external lighting (beyond those required for safety). Where possible, lighting will be floor-level, and use red light to minimise light transmission etc.
  - Gas or electric heating
  - A mixture of timber and steel construction in muted bush-tones. This will provide buildings that require a minimum of maintenance and associated activity.
  - Minimal fixings anchoring footings to the ground (rock) are planned (e.g. epoxy and bolts), and site location is open sheet rock requiring no excavations, earthworks or altering of natural drainage.
  - Site location allows the new camp to be discretely and sympathetically hidden from sight when viewed from the existing historic hut, and from the mainland. See appendix Image 1 for an artists' impression of the Standing Camp location,



in reference to the historic Halls Hut.

- The Standing Camp will be completely removable should the need arise.
- See appendix Image 6 for an artists' impression of accommodation building.
- A helicopter landing pad will be constructed on the mainland adjacent to Halls Island, facilitating arrival / departures. Approximate location to be sited on a coral-fern plain (to be confirmed during on-site selection with Flora and Fauna specialists from North Barker). Approx. location GDA94 442409E, 5355287N
- A helicopter flight-path has been developed to ensure minimal airtime, and minimal impacts on other users in the area. See Appendix Halls Island Maps, Maps 2 & 3. The flight path results in the minimum flight time over the TWWHA (approx. 11 minutes each way), and avoids crossing and walking routes. The flight path also avoids major trout fishing destinations, and only crosses above two waters known to contain trout.
- The proposed flight path avoids all known raptor-nesting sites, with the closest being + 7km's to the east. See Appendix Halls Island Maps, Map 1.
- Informal boat mooring will occur in the vicinity of the natural rock landing GDA94 44197E, 5355296N
- Helicopter servicing relating to construction, maintenance, and re-supply of Standing Camp will occur within the Standing Camp footprint, utilising an area of natural sheet-rock for depositing and the collection of goods (via slinging) GDA94 442007E, 5355448N
- See Appendix Halls Island Maps, Map 6, for an indication of the standing camp site plan. Note that exact locations of huts and outbuildings will be determined at time of construction, in co-ordination with a flora and fauna specialist, to minimise impacts on flora, and to maximise use of the naturally cleared areas of flat sheet-rock.
- The pruning (preferential), or removal of <6 alpine yellow-gums damaged in the winter 2016 storms may need to occur, to protect the culturally important existing Halls Hut from damage, and comply with OH&S obligations. Materials from these trees may be re-used in the restoration of Halls Hut, or as a fuel source in existing Halls Hut. The pruning (preferred) or removal by hand of a small number of common species (teatree, hakea, bauera) may also be required among the selected site.
- The Standing Camp would occupy a primary area within a 40 metre x 20metre site.
  - FRP board-walking is envisaged to be used around the island, to facilitate access to and from the Standing Camp, and to key on-island interpretation sites, while minimising impacts on flora. The three sites are
  - ~25 metres of raised FRP boardwalk at MSP sphagnum peatland 442006E, 5355468N to provide a link between the Standing Camp site and the northern edges of the island.
  - ~15 metres of raised FRP boardwalk at MSP 441966E, 5355371N to link the Standing Camp site and Halls Hut with the natural rock jetty. This location already features a prominent foot-pad through the MSP, and will be improving the environmental management of the foot pad.
  - ~17 metres of raised FRP boardwalk linking Halls Hut site with the RSH rainforest 441908E, 5355389N. The boardwalk may terminate with a seating area, to facilitate interpretation at this location.

- The camp will be managed as per a Site Use Plan agreed to by the PAWS, which will include annual inspections attended by the site manager, and the landlord (PAWS).
- Though Halls Hut is privately-owned, and separate to this RAA, it may be pertinent to note that a woodstove will be installed in the heritage hut during the adjacent camp-construction process. This will permanently reduce the risk of fire from the existing open-fire, while maintaining an important cultural element of the historically significant hut.

### **1.3.2 Camp Construction**

- The camp buildings will be delivered by heli-sling, from Lake St Clair. To maximise sustainability, buildings will be prefabricated off-site, and be designed to minimise the number of helicopter movements required. Sustainability on all levels (economic, environmental and social) dictates a minimum amount of helicopter use during this period. Fifteen hours of flight time is currently budgeted for.
- On-site construction will be performed with the use of hand tools, and battery-operated tools. A small four-stroke generator will be used to re-charge drills etc as required. It is planned that the camp will be installed to lock-up stage within a 20-30 day period.
- Safety will be governed by a Risk Assessment and OH&S Plan.
- Impact mitigation will be managed through a site management plan, on-site induction related to listed species and communities on the island, risk mitigation measures, and supervision.
- An Unanticipated Discovery Plan will be developed and implemented, to cover scenarios where Aboriginal heritage, or listed flora and fauna are found on the construction site. This plan will involve contacting the relevant government bodies, and suspending works while further assessments are made.
- Construction is planned to occur in March 2018. Though no eagles nests have been identified in the vicinity of Halls Island, it is our intention to commence building at the end of the nesting season (end of Feb) to ensure no potential impacts.
- Toilet pods will be installed at the beginning of the construction phase, to ensure that all waste is collected during the build.
- All building waste will be removed off-site upon completion of the build.

### **1.3.3 Camp Operations**

Activities and operations would be governed by a PAWS approved Operations Manual, and reviewed annually by the proponent and PAWS (during June/July annually) to facilitate monitoring, and implement minor-adjustments as required. This method is in place for the proponents existing operations the TWWHA, and has proved to be a flexible and pragmatic management approach.

All impact mitigation measures noted in the North Barker Flora and Fauna Assessment (see appendices) will be adopted to minimise impacts and risks during construction and operations. These include:

- The avoidance of MSP and RKP habitats, and *P. hookeriana* species locations, and the use of boardwalking where required.
- Avoid wood-fireplaces and sources of potential ignition within the new buildings
- Maintain best practice hygiene protocols prior to entering the TWWHA, and once in

the TWWHA. These guidelines are based on the 'Keeping it Clean' manual produced by NRM South, March 2010. F10SC is the primary chemical treatment used on all equipment, after visual checks and cleans.

- Use continual education and supervision as part of the overall interpretation and presentation of the TWWHA, to ensure minimal impacts.

**Trip details:**

- The current Business Plan proposes a maximum of 25 commercial trips per season, with a maximum of six customers per trip. Each trip will feature two guides. This is a low-volume, high-yield business model designed to facilitate sustainable tourism. A further 5 annual winter trips may be considered at a later point.
- Each trip is planned for 3 nights, 4 days
- A capacity trip will be charged at a rate of s45
- Arrival to Lake Malbena will occur at a helipad located on the mainland, and guests will be ferried across to the island. This is in-keeping with the historic use of Halls Island, where Reg Hall and guests arrived by water (by boat or seaplane).

**Proposed activities include:**

- Kayaking on Lake Malbena – operations will meeting Marine And Safety Tasmania (MAST) requirements.
- A half-day walk up Mount Oana (GDA94 441609E, 5355034N) adjacent to the Lake Malbena shoreline. This is adjacent to the Self-Reliant / Wilderness Zone boundary, however we believe that the dry-sclerophyll and rock habitat found on the northern face is traversable without creating any significant impacts. Exact route to be determined with an on-site Flora and Fauna specialist in liaison with PAWS, and walks to be GPS tracked and reported annually for monitoring. See appendix Halls Island Maps, Map 4.
- s45

\*Aboriginal cultural interpretation is reliant on input, permission and facilitation from the wider Tasmanian Aboriginal Communities.

- European cultural interpretation at archaeological sites (chimney stack and horse paddock s45
- On-island European cultural interpretation built around the Reg Hall and Walls Of Jerusalem story.
- On-island passive activities (i.e. un-guided walking within WSU communities and boardwalking, to be defined in operations manual)
- Occasional fly fishing specific activities around lakes Malbena, s45

s45 prescribed impact-minimisation walking strategies will be used (eg fan-out, sticking to high and rocky ground etc) as per our existing fishing operations in the self-reliant and wilderness zone further south at Lake Ina. Furthermore, trip numbers s45 will capped at six per annum, to minimise any potential or perceived impacts, and all trips will be GPS logged, and reported annually should monitoring be required. See appendix Halls Island Maps, Map 7

#### **Helicopter use:**

- Helicopter use will be required, facilitating up to 30<sup>1</sup> commercial trips (arrivals / departures) per year. This is a key element of the product, facilitating high-quality aerial overview and interpretation of the Cultural Landscape, and Outstanding Universal Values found in the area. Approximate air-time required is 12 minutes each direction from Lake St Clair (preferred departure point). Total flight time from these 30 trips per year is estimated at a minimal 30-40 hours per year, total. The proposed route is currently Lake St Clair – Travellers Rest – Jackie –Malbena. See appendix Halls Island Maps, Maps 1-3, Attachment 8. This route avoids known Wedge Tail nesting sites, all recorded walking routes in the area, and only passes over two trout fishing waters (Travellers Rest, and Jackie / Burrow, the latter of which are un-remarkable fishing locations).
- Approximately 3 hours of further helicopter use will be required annually for maintenance and servicing of the Standing Camp. Ideally this will occur in partnership with PAWS and other planned helicopter use in the area (resource sharing).
- Additional media-famils, along with dedicated (non-commercial) cultural and scientific expeditions to Halls Island will be approved through a separate as-required permit application process, with a minimum of 72 hours' notice to PAWS. Where possible the latter cultural and scientific expeditions will be ran through the PAWS Green Guardian Program, and partner with Tasmanian Museums and other public entities as appropriate.

Refer to Attachment 10 for further information on helicopter use.

#### **Non-motorised access to site**

- Hike-in access to the site is currently available via the adjacent trawtha makuminya property to the east (using a redundant horse / 4wd track from Lake Olive), or from the adjacent Skullbone Plains property to the south. These access points will be used from time to time by owners and staff to access Halls Island for maintenance or other requirements, thereby limiting the use of mechanised air access where possible.

#### **On-island numbers**

- To enable the bookending of consecutive trips, minimising helicopter use and maximising sustainability, the proponents envision a scenario where departing and arriving groups may at times crossover. To facilitate this, operational permits shall include the ability to have up to two-groups on island at any time (up to 12 customers, and 4 guides). This capacity should be restricted to daylight hours only ensuring the legitimacy of the request / permit.

### **1.4 Objective/s (the aim) and Outcome/s (aimed for change)**

- The creation of a new flagship, sustainable Tasmanian tourism product, offering

<sup>1</sup> Updated as a result of amended information provided 11/01/2017 – Attachment 10

adventure tourism activities radiating from a single base, and un-paralleled cultural interpretation relating to the TWWHA.

- The development of high-quality presentation of the built-heritage found on Halls Island, which is intrinsically linked to the foundation of the Walls of Jerusalem National Park.
- Through partnering with members of the Tasmanian Aboriginal communities, the development of high quality interpretation relating to the 30,000+ years of human history in the TWWHA.
- A greater involvement of members of the Tasmanian Aboriginal communities in the presentation of the TWWHA, through a direct involvement in the Halls Island project.
- Increased access to Country for local Aboriginal communities, through partnerships with the proponents.
- Increased community engagement in the cultural history of the TWWHA, through 'satellite' activities such as historical exhibitions in partnership with the Queen Victoria (QV) Museum (already underway), and the sharing of other materials relating to the history of the Walls of Jerusalem National Park.
- An increased awareness of the natural values found in the eastern areas of the TWWHA, through science-based partnerships with the QV Museum Natural Sciences department (already underway), PAWS, and other interested parties.
- Through regular presence on-the-ground, the proponents' would be increasing monitoring of activities in the eastern area of the TWWHA on behalf of PAWS. This informal role has already proved to be effective and valuable further south at Skullbone Plains, where the proponents' commercial presence has led to the detection and reporting of a number of illegal vehicle incursions, and has overall contributed in a decrease from dozens of illegal activities per season, to single events.
- Provide for ecologically sustainable recreation and engagement with the wilderness, consistent with conserving those values.
- Increase the diversity of visitor experiences available in the TWWHA.
- Increased employment (+3 FTE) in regional Tasmania, and contribute to the economic sustainability of the proponent's existing regional business activities.
- Assist in meeting the goals of the Parks 21 strategic plan.
- Through income and awareness derived from the operations, the privately-owned Halls Hut is conserved in perpetuity.
- To create 3 FTE employment positions as a result of this project, and consolidate on the long-term sustainability of the proponent's existing business.

### 1.5 Outputs or Products (results)

The objectives and outcomes in 1.4 are achieved.

### 1.6 Evaluation (how you know it worked)

#### 1.6.1 External Benchmarking

- For the purpose of external benchmarking (eg benchmarking for licencing / lease purposes), we suggest the following quantifiable benchmarks:
- Australian Tourism Accreditation Program (ATAP) accreditation encompassing the product is achieved within 12 months of construction completion, and maintained.



The ATAP process and accreditation allows for input from external stakeholders such as PAWS should the need arise.

- ECO certification (eco-tourism level) is achieved within 12 months of construction, and 'advanced eco-tourism' level certification is achieved within three operational seasons. This process and accreditation allows for input from external stakeholders such as PAWS should the need arise.
- The development achieves 'Finalist' at the Tasmanian Tourism Awards level.
- The development maintains high-profile support from key tourism stakeholders including the Tourism Industry Council Tasmania (TICT) and Tourism Tasmania.
- The developed product includes active input and participation from members of the Tasmanian Aboriginal communities. For instance, basic interpretation of the Cultural Landscape is developed by respected Aboriginal elder(s), for use at Halls Island.
- Through an existing and developing partnership with the QV Museum, scientific knowledge, social awareness and accessibility to the cultural and natural assets of the TWWHA surrounding Halls Island is increased.
- Participation in the PAWS Green Guardian program or similar, as opportunities arise.

#### **1.6.2 Internal benchmarking**

- As would be expected, the operation will be run in conjunction with a comprehensive Business Plan. The Business Plan will include a Financial Plan (with annual budget, and three year P&L), Marketing Plan, Operations Manual, OH&S Strategy, Employee Management Plan (including access to on-going training and development) and Sustainability Plan. This over-arching Business Plan forms the basis of the benchmark accreditations such as Australian Tourism Accreditation Program (ATAP) and ECO-accreditation, feeding back into external benchmarks.

### **1.7 Need** (why)

#### **1.7 Need**

- The proposal is an outcome of the State Government Expressions of Interests – Tourism Investment Opportunities in the Tasmanian Wilderness World Heritage Area, National Parks and Reserves process.
- A number of the outcomes generated by this proposal support the broader prescribed, required outcomes of the TWWHA Management Plan, including:
- Increased the diversity of products that is consistent with the conservation of natural and cultural values
- Increased Aboriginal participation in the presentation and interpretation of the TWWHA
- Increased understanding and presentation of the TWWHA as a Cultural Landscape
- Providing for ecologically sustainable recreation consistent with conserving the values of the TWWHA
- Increase monitoring of natural values in and around Halls Island
- Increased monitoring of activities along the eastern boundary of the TWWHA, through the commercial operations at Halls Island
- Increase the profile and value of historic heritage to local communities, relating to the Walls of Jerusalem National Park and greater TWWHA.

### 1.8 Timetable (when)

It is planned that successful RAA, EPBCA referral, Development Approval and Building Approval will be achieved by October 2017.

September 2017 will see a preferred architectural and construction company selected, and off-site construction commence will commence by January 2018.

On-site construction will commence by March 2018. These timeframes may be delayed by 12 months in the case of DA, EPBCA or other related and unforeseen appeals / delays.

It is important to note that this project is the first to undergo assessment under the new Tasmanian Wilderness World Heritage Area Management Plan 2016, and as such some elements of the assessment and approval process remain un-tested, and may result in unforeseen delays.

### 1.9 Environmental Benefits and Impacts (summary Use the [Maplink report](#) to assist here)

See Appendix - Flora and Fauna Assessment prepared by Northbarker, and 1.4 Outcomes and Objectives (which include environmental benefits). See 4.1 (RAA) for detailed assessment matrix.

#### **Conclusion Summary (from the Northbarker report):**

Our field survey has established that the island contains two threatened vegetation communities (MSP and RKP) and one threatened plant species (*P. hookeriana*). It is recommended that the locations of these values are not utilised for standing camp or helicopter pad placement. Management prescriptions should also be applied to protect these values from fire and to avoid tramping.

It is understood that the current proposal is to place the standing camp and helicopter pad footprint within the ORO and WSU communities. These non-threatened communities are likely to be resilient to a proposal of this nature and potential losses in extent are considered to be negligible. It may be possible to construct boardwalks within the other communities by using a boardwalk design with minimal footprint and shading.

**Action: The proponent will adopt the above mitigation measures in full.**

Environmental benefits from the proposal will include a wider knowledge of the flora and fauna in the general area, and greater access to the area for interested scientists (as facilitated by the proponents as part of annual operations). Already to date the proponents have facilitated a benchmarking survey trip with the QV Museum Launceston, in order to collect and identify invertebrates from the previously un-surveyed area.

\*Worth noting is that the NVA Natural Values Assessment Report (see appendices) has indicated that there are no fire records for the area. We have personal family records from Reg Hall indicating a large fire generated a significant ember attack and subsequent fires on the island during some point in the 1960's, whilst Reg and friend Dick Reed were in-residence, in situ. This provides explanation for some of the existing fire damage on the mainland and surrounds.

### 1.10 Cultural and Social Benefits and Impacts (summary)

#### Potential impacts:

Perceived social impacts appear to relate to the 'privatisation' of the island. The proponents will facilitate occasional access to the historic (privately owned) Halls Hut on request, when appropriate, for regular past-users, or those with a specific interest in the European cultural history of the island.

#### Social Benefits:

- The development of high-quality presentation of the built-heritage found on Halls Island, which is intrinsically linked to the foundation of the Walls of Jerusalem National Park.
- Through partnering with members of the Tasmanian Aboriginal communities, the development of high quality interpretation relating to the 30,000+ years of human history in the TWWHA.
- A greater involvement of members of the Tasmanian Aboriginal communities in the presentation of the TWWHA, through a direct involvement in the Halls Island project.
- Increased access to Country for local Aboriginal communities, through partnerships with the proponents.
- Increase community engagement in the cultural history of the TWWHA, through 'satellite' activities such as historical exhibitions in partnership with the Queen Victoria (QV) Museum (already underway), and the sharing of other materials relating to the history of the Walls of Jerusalem National Park.
- Through regular presence on-the-ground, the proponents' would be increasing monitoring of activities in the eastern area of the TWWHA on behalf of PAWS. This informal role has already proved to be effective and valuable further south at Skullbone Plains, where the proponents' commercial presence has led to the detection and reporting of a number of illegal vehicle incursions, and has overall contributed in a decrease from dozens of illegal activities per season, to single events.
- Provide for ecologically sustainable recreation and engagement with the wilderness, consistent with conserving those values, as per the TWWHA Management Plan.

### 1.11 Economic Benefits and Impacts (summary)

#### 1.11 Economic Benefits and Impacts

- It is anticipated that the building phase of the development will result in a direct spend, within Tasmania, \$45 [REDACTED]
- Annual gross income of up to \$45 [REDACTED]
- Up to 3 full-time-equivalent (FTE) employees, with a direct benefit of \$409,500 to the local economy, per annum (based on 'recreation services employment' using REMPLAN modelling).

#### The project aligns with the following State and Regional Plans:

- Australian Government Tourism 2020 Plan to (i) encourage high-quality tourism

experiences, including indigenous tourism, and (ii) develop tourism infrastructure that can drive demand.

- The project meets the desired outcomes of the 2014 Reimagining the Visitor Experiences of the TWWHA Project, which was developed in partnership between the Tourism Industry Council Tasmania, PAWS, Tourism Tasmania and Cradle Coast Authority.
- The Halls Island proposal supports the goals of, and is a result of the State Government EOI for Development in the Tasmanian Wilderness World Heritage Area Expression of Interest process (2014).
- Halls Island supports a number of primary objectives of the T21 – The Tasmanian Visitor Economy Strategy 2015-2020 including investment in quality infrastructure, committing to world-leading, sensitive, low-impact commercial tourism that respects and elevates the environmental and cultural significance of the area, and champions' entrepreneurialism and demonstrates innovation in the Tasmanian Visitor Economy.

### 1.12 Alternatives (other ways)

Explain the other options that were considered to meet your outcome/s and cost and why they were not preferred? State why the preferred option is supported. (Attach additional information if necessary at part 1.13)

Options		Comments
Do nothing	N/A	
Eliminate	N/A	
Isolate/Substitute	N/A	
Engineer	N/A	
Administrate	N/A	
Preferred Option	To develop and operate a luxury Standing Camp on Halls Island, Lake Malbena.	

### 1.13 Attachments

No.	Description/Details of Attachment eg. maps, photos, reports
1	Halls Island AHT (Aboriginal Heritage Tasmania) Advice
2	NCH (DPIPWE) Advice Halls Island – Natural Values Assessment Report 4/6/2015
3	NCH (DPIPWE) Advice Halls Island – Natural Values Assessment Report 20/4/2017
4	Heritage Tasmania report 15 June 2016
5	Image 1 Proposed site plan
6	s45
7	Halls Island Flora and Fauna Survey prepared by North Barker and associates
8	s45
9	Helicopter flight route eagle habitat / nest assessment – NJ Mooney
10	Supplementary helicopter-usage information
11	n/a

#### 1.14 Third Party Description and Interest in the Activity

No other parties at this stage.

## Step 2 – Concept Review

At this step the activity is considered against legislation, management plans, subsidiary plans and PWS policies. PWS activities are checked to ensure they have been approved and funded. This step examines whether there are any major flaws in the activity that would make it inappropriate to continue the assessment.

### 2.1 Legislation and State Policies

Note: see manual for summaries of the legislation listed below. Place an 'X' in the relevant column in the table below.

<b>Acts</b> Is the activity compliant with the following Acts:	Compliant	Potentially Compliant	Not compliant	Act not Applicable	<b>Details</b> Note relevant section/s of the Act and explain why the activity complies, potentially complies or does not comply with the Act. If it is potentially compliant state what is required to make it compliant
<b>Core Acts</b> (always check)					
National Parks and Reserves Management Act 2002		X			Requires RAA, DA and GofA
Crown Lands Act 1976				X	
Nature Conservation Act 2002		X			Requires RAA, DA and GofA
Threatened Species Protection Act 1995		X			Requires RAA, DA and GofA
Aboriginal Relics Act 1975		X			Requires aboriginal community agreement
Historic Cultural Heritage Act 1995		X			Hall hut is not listed on the Tasmanian Heritage Register.
Land Use Planning and Approvals Act 1993		X			DA required – Discretionary Use
Environment Protection and Biodiversity Conservation Act 1999		X			Ecological studies to inform RAA and approvals process
Work Health and Safety 2012		X			WS Plan required for construction and operations
<b>Other Acts</b> (check as relevant)					
Environmental Management and Pollution Control Act 1994				X	
Water Management Act 1999 / State Policy on Water Quality Management 1997				X	
Fire Service Act 1979		X			BAL assessment possibly required for standing camp structures
Forest Practices Act 1985				X	
Living Marine Resources Management Act 1995				X	
Mineral Resources				X	



<b>Acts</b> Is the activity compliant with the following Acts:	Compliant	Potentially Compliant	Not compliant	Act not Applicable	<b>Details</b> Note relevant section/s of the Act and explain why the activity complies, potentially complies or does not comply with the Act. If it is potentially compliant state what is required to make it compliant.
Development Act 1995					
Building Act 2000 Building Reg's 2004, Plumbing Reg's 2004		X			DA required – Discretionary Use B & P permits required
State Coastal Policy 1996				X	
Other: State Act . . .					

## 2.2 PWS Management Plans, Subsidiary Plans and Policies

List any management plan, site plan, maintenance plan or other planning document, strategy or policy relevant to the activity below.

<b>Plan/Document Name</b>	Compliant	Potentially Compliant	Not Compliant	<b>Details</b> State relevant sections and page numbers. Explain why the activity does or does not comply and any required conditions if it is potentially compliant. List any proposed changes to plans and their rationale. Ensure the activity fits with plan zoning.
<b>TWWHA Management Plan 2016</b>  <b>See attached Tables 1 &amp; 2 addressing Section 3.3.1. Section 6.8 &amp; Section 8.2 and comments to date.</b>		X		<b>Section 3.3.1 Reserve Activity Assessment – Pages 81 - 82.</b> <ul style="list-style-type: none"> <li>Identify the World Heritage values likely to be affected by the proposal;</li> <li>Identify how those values might be affected;</li> <li>Consider direct, indirect and cumulative impacts on World Heritage values;</li> <li>Identify how any impacts on World Heritage values will be managed or mitigated;</li> <li>Consider the social and environmental benefits and impacts of the proposal;</li> <li>Consider appropriate monitoring and compliance measures; and</li> <li>Consider provision of public consultation based on the scale and nature of the proposal.</li> </ul> <b>Section 6.8 Commercial Tourism – Pages 149 – 150. A proposal must:</b> <ul style="list-style-type: none"> <li>Describe how the experience is based on the values and features of the TWWHA;</li> <li>Submit a case for why it should be situated within reserved land and address compatibility with existing services and infrastructure;</li> </ul>

Plan/Document Name	Compliant	Potentially Compliant	Not Compliant	Details State relevant sections and page numbers. Explain why the activity does or does not comply and any required conditions if it is potentially compliant. List any proposed changes to plans and their rationale. Ensure the activity fits with plan zoning.
TWWHA Management Plan 2016		X		<ul style="list-style-type: none"> <li>Describe how it will contribute to the guiding Vision and management Objectives for the TWWHA as articulated in the management plan (Section 1.7 Pages 34 – 35);</li> <li>Describe how potential impacts on the legitimate enjoyment and experience by others of TWWHA features and values will be managed;</li> <li>Describe how it will be constructed and / or operate in a manner compatible with the protection and conservation of World Heritage and other values;</li> <li>Incorporate environmentally sustainable operational practices and the use of environmentally 'best practice' goods and technologies;</li> <li>Detail any external costs resulting from the proposal including ongoing monitoring and compliance; and</li> <li>Demonstrate economic viability.</li> </ul> <p><b>Section 8.2 Wilderness Values Pages 173 - 175.</b></p> <ul style="list-style-type: none"> <li>Further description of the proposed helicopter flight path's impacts on wilderness values, aesthetic values (including characteristics of remoteness and isolation of on ground TWWHA users) and natural values (flora, fauna including results from Raptor suitable nesting habitat assessment and nest survey)</li> </ul>
REVISED POLICY (PWS P-036) WALKING TRACK CLASSIFICATION SYSTEM		X		<b>Detail re party sizes for T4 tracks and Routes</b>

## 2.3 Reserves Standards Framework (RSF)

Current RSF Category	Self-Reliant Recreation Zone and Wilderness Zone	Aspirational RSF Category	Self-Reliant Recreation Zone and Wilderness Zone
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Does the activity conform with the Aspirational RSF category, or, if this has not been determined, the current RSF category? (Use the [PWS Site Register](#) to find RSF information)

☒ Yes ☐ No ☐ Activity not described by RSF

If No, state the proposed new category below and detail the business case for the change.

Note that stage 2 of the proposal may involve activities and physical impacts that could be inconsistent with wilderness recreational settings. This aspect has yet to be assessed.

## 2.4 PWS Priorities

Is the activity listed in the current PWS Strategic Plan?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Comment: The PWS Strategic Plan does not specifically refer to this proposal.
Is the activity listed in a Regional/Branch business plan or strategic plan?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Comment: The Regional/Branch business plans do not specifically refer to the merits of this proposal just undertaking assessment process.
What is the budget priority score	_____	Comment:

## 2.5 Comment on Concept Review

Bearing in mind the environmental, social/cultural and economic benefits and impacts at Step 1 (parts 1.9 - 1.11), and referring to the Maplink and Natural Values Atlas reports, note whether the activity is likely to result in significant negative impacts that cannot be overcome (and therefore shouldn't be supported), or whether it can be supported with conditions. Provide a short summary in the Comment field below to assist the Regional Manager's decision below.

Comment
Refer to RM comments in attached briefing note: "Halls Island EOI-RAA" dated 3 October 2017.

## 2.6 Decision Point – Concept Review

Following consideration of the above matters (Step 2, parts 1 to 5) the Regional Manager judges whether the concept is supported or not. If the concept is supported it proceeds to the next assessment step (Step 3). It can also be 'parked' at this step (to move forward in the assessment at a later time). If the concept is not supported the project does not proceed and the reasons are given to the proponent.

- ☒ **Concept Supported** (Assessment moves to next step)
- ☐ **Concept Supported - Parked** (Assessment moves to next step at a later date)
- ☐ **Concept NOT Supported** (Activity cannot proceed further)

Why not appropriate?	Details
<input type="checkbox"/> The proposed activity conflicts with legislative or	

policy requirements.	
<input type="checkbox"/> The proposed activity contravenes an existing planning document or strategy.	
<input type="checkbox"/> The proposed activity is likely to cause unacceptable environmental, social or economic impacts.	
<input type="checkbox"/> Other	

**Signed:** Chris Colley



**Title:** Regional Manager North

**Date:** 9 October 2017

Comment, explanation

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NB If the concept is supported at the end of this step this allows the activity to proceed further in the assessment process; it does *not* signify formal approval of the activity.

## Step 3 – Assessment Scope

This step determines the scope of all relevant assessments and the level of documentation that will be required. It determines the level of RAA - levels 2, 3 or 4, (note: level 1 RAA's use a separate form) and it integrates with all internal (PWS) and related external assessment processes. The PWS Initiating/Contact Officer recommends and the PWS Regional Manager decides which options are selected at this step.

### 3.1 RAA Documentation (Select one option only)

RAA Documentation Required	Additional Information/Requirements
<input type="checkbox"/> Level 2: RAA	
<input checked="" type="checkbox"/> Level 3: RAA (L2 + surveys)	
<input type="checkbox"/> Level 4: RAA (DPEMP)	

### 3.2 Circulation List (RAA levels 2 to 4 only, list approved at Step 3, circulated at Step 5)

PWS Head Office (134 Macquarie St, Hobart) GPO Box 1751, Hobart 7001	<input checked="" type="checkbox"/> Visitor Services Branch, PWS <input checked="" type="checkbox"/> Planning <input type="checkbox"/> Education & Interpretation <input type="checkbox"/> Historic Heritage <input checked="" type="checkbox"/> Operations Branch, PWS <input checked="" type="checkbox"/> Fire Management <input type="checkbox"/> Asset Services <input checked="" type="checkbox"/> Business Services Branch, PWS <input checked="" type="checkbox"/> Commercial Visitor Services (CVS) <input checked="" type="checkbox"/> Leases and Licences (non visitor)
Region (only fill out if an additional region is to comment) <input type="checkbox"/> North <input type="checkbox"/> North West <input type="checkbox"/> South	<input checked="" type="checkbox"/> Regional Manager <input checked="" type="checkbox"/> Regional RAA Coordinator <input type="checkbox"/> Other <input type="checkbox"/> _____ <input type="checkbox"/> _____
Aboriginal Heritage Tasmania GPO Box 771, Hobart 7001	<input checked="" type="checkbox"/> Aboriginal Heritage, DPIPW
Natural and Cultural Heritage Division DPIPW GPO Box 44 Hobart 7001	<input checked="" type="checkbox"/> PCAB (specialist review of flora, fauna, geo etc)
Advisory / Consultative Committees	<input checked="" type="checkbox"/> National Parks and Wildlife Advisory Council  Committee

### 3.3 Additional Internal (PWS) assessments

Select (replace the checkbox with an 'X') and state any additional PWS assessments required, and their relationship to the RAA.

Additional PWS Assessment	Relationship to RAA / Further Information
<input type="checkbox"/> _____	
<input type="checkbox"/> _____	
<input type="checkbox"/> _____	

### 3.4 Additional External Assessments

This step determines whether additional external assessments are required beyond those conducted by the PWS. The most commonly integrated external assessments are LUPAA and EPBC but others are also possible – refer to the RAA Manual).

#### Development Application (under Land Use Planning and Approvals Act (LUPAA))

Municipality	<b>Central Highlands Council</b>
Zoning under the Council Planning Scheme	<b>Environmental Management Zone</b>

Under the relevant Planning Scheme the activity is: (check one option only)

LUPAA Status	Further Detail	Development Application
<input type="checkbox"/> Exempt		Not required
<input type="checkbox"/> A Permitted Use	Permitted use 'Tourist Operation' subject to the successful completion of RAA, and adoption of 'acceptable solutions' (to which this project will be compliant). No advertised DA required. See attachment #14 (Council advised that a Discretionary DA may be required if helipad and boardwalks are built in Waterway and Coastal Protection Overlay – initial Council advice above given on basic plan with not much detail)	Required
<input checked="" type="checkbox"/> A Discretionary Use	Discretionary DA may be required if helipad and boardwalks are built in Waterway and Coastal Protection Overlay	Required
<input type="checkbox"/> A Prohibited Use		Required

#### Environment Protection and Biodiversity Conservation Act 1999 (EPBC)

EPBC Impact: Will the activity impact on:	What is the likely impact? Is there likely to be a 'significant' impact on any matter of national environmental significance from the activity?	Referral under EPBC recommended?
World Heritage Sites (Tasmanian Wilderness, Macquarie Island)	It is not anticipated that there would be a significant impact on Outstanding Universal Values however considering the perceived impact on wilderness recreational experiences from aerial operations it was agreed with the proponent that they would refer the proposal to the Australian Government for assessment under EPBCA. This would assist in determining stakeholder and public thoughts on the issue.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Ramsar Wetlands	N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Nationally Threatened Species	Listed species are present on the island. By adopting prescribed mitigation measures, potential impacts classed as negligible (see NorthBarker report).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No



Protected Migratory Species	N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Commonwealth Marine Areas	N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
National Heritage Places	N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Other		<input type="checkbox"/> Yes <input type="checkbox"/> No

Note that the General Manager PWS determines whether a referral under EPBC is required, actual referral occurs at Step 7.

#### OTHER External Assessment

State any other external assessments required, and their relationship to the RAA (e.g. Dam, beekeeping, Hydro, Mineral exploration). See manual for all potential external assessments and list them below.

Other External Assessment	Relationship to RAA / Further Information
<input type="checkbox"/>	
<input type="checkbox"/>	
<input type="checkbox"/>	
<input type="checkbox"/>	
<input type="checkbox"/>	

### 3.5 Decision Point – Assessment Scope

The scope of the RAA, internal and external assessments required are as indicated above.

The signature of the RM (and the additional signature of the General Manager in some circumstances) below means the next step in the assessment can commence, it does not grant any form of approval at this point.

**Signed:** Chris Colley

**Title:** Regional Manager North

**Date:** 11 January 2017

**Signed by PWS General Manager** (only if required see RAA Manual)

**Date:** 11 January 2017

**Explanation, further assessment of action required**

## Step 4 – Impact Assessment and Proposed Management

This part of the RAA records the impacts and benefits of the activity in detail. Impacts and benefits are examined under three headings — Natural Values, Cultural Values and Economic Values. Use N/A if a value is not applicable for this activity. Consider cumulative effects that may result from the activity.

### 4.1 Natural Values Assessment: Impacts, Benefits and Management

Natural Values (including natural assets, processes and systems)	General description and existing conditions. List values/assets of significance, surveys completed (by whom and when), specialist staff consulted and relevant ref's.	Likely impact / benefit on values / assets (natural processes and systems, including cumulative effects). Particularly assess impact on world heritage and other significant natural values.	Risk level (no controls)	List control options Management actions to be taken to avoid or minimise any likely negative impacts, include ongoing monitoring.	Risk level (controls)	X Ref. Action Plan
1. Flora (threatened species, priority communities, critical habitats and endemic, regionally or locally significant species, RFA priority forest types, WHA flora values)	TasVeg classifications: Eucalyptus subcrenulata forest and woodland (WSU) <i>Sphagnum</i> peatland (MSP), Lichen lithosphere (ORO), <i>Athrotaxis</i> selaginoides rainforest (RKP) Highland low rainforest and scrub (RSH) present	Trampling is the primary concern (medium) among MSP's.	Med	Adopt all mitigation measures prescribed in the Avoidance of trampling (on-island) within the Flora and Fauna assessment: A. Avoid routes through MSP's, or facilitate passage across MSP's by installing raised, perforated FRP boardwalking. Risk is mitigated. B. Education and supervision during trips. C. Siting of standing camp among ORO or WSU communities. D. Create visitor exclusion zones, excluding visitors from sensitive communities MSP, RKP, and <i>Pterodroma hookeriana</i> communities (see Map 6, appendices)	Negligible	4.1.1.1
		Fire threat is a second potential threat (low).	Low	Fire risk mitigation – Electric or gas heating in Standing Camp. – no open flames, Smoking only permitted in designated area.	Improved conditions	4.1.1.2

	An existing foot-pad is present through one of the MSP communities south west of Halls Hut.	Improved health of MSP community by installing perforated boardwalk or rock-re-enforcement as per Flora and Fauna recommendations.	Low – Med	Install boardwalk or rock re-enforcement along existing impact.	Negligible - low	4.1.1.3
	Mount Mawson Pine (Pherosphaera hookeriana)	Trampling of plant species	Low	Ensure on-island routes/tracks avoid this species. Where existing routes pass by this species (near the natural rock jetty), use short lengths of boardwalk to ensure clear walking route that avoids plant species. Education and supervision to re-enforce impact mitigation. Utilise no-access areas for visitors, see appendix Halls Island Maps, Map 6, for site plan including exclusion zones.	Negligible	4.1.1.4
	Off-island communities susceptible to trampling. E.g.: Sphagnum, marshes etc.	Trampling and route-formation	Med	Implement minimal-impact bushwalking techniques including: fan-out, sticking to hard ground on the edges of plains / forest, avoid crossing striated marshes and marshes in general. Monitor walking routes by GPS, and actively monitor and adjust walking routes annually as part of Operations Manual. These guidelines have been proven to be effective at the proponents other operations in the TWWHA, including within the self-reliant and wilderness zones.	Low	***
2. Fauna (Rare or Threatened species, critical habitats, endemic species, regionally or locally significant species, WHA fauna values)	See North Barker Fauna Assessment, and (PWS and Nick Mooney) Eagle Nest Survey results.	Fauna Assessment notes no impacts to threatened species are likely to result from the proposal.	Low	Ecological survey completed for Halls Island component – walking routes to be surveyed once confirmed.	Negligible to low	***
	Raptors (eg: Wedge Tail Eagle): New	Disturbance to nesting sites. Suitable habitat searched – no	Mod	None required Helicopter flights routes regularly	Low	

	discovery for nesting sites on-island, or within the planned flight route	nests found		reviewed and adjusted to take account of any new nesting sites.		
	Clarence Galaxias ( <i>Galaxias johnstonii</i> ) – population approximately 5km east of Halls Island	Disturbance of water course (erosion etc)	Low	Commercial trips will avoid this high plateau habitat area.	Low	4.1.2.3
	Other fauna	Humanising of local fauna	Low	Education and supervision of customers to ensure no feeding or petting of animals. Ensure all food wastes etc are properly stored.	Negligible to low	4.1.2.4
<b>3. Geoconservation</b> <i>Geology</i> (uncommon rock types, minerals, fossils or similar; significant outcrop or landform, WHA geo values) <i>Geomorphology</i> (sensitive landform systems e.g. karst, dunes, rivers, marshes, estuaries coasts) <i>Soils</i> (rare soil types e.g. Basalt derived and hosting native vegetation; soils sensitive to disturbance eg. peats, sands, alpine soils)	Central Highlands Cenozoic Glacial Area (Site ID 2953) & Central Plateau Terrain (Site ID 2684)	Ground disturbance resulting in impacts on geoconservation sites.	Negligible-low	Camp will be installed using hand tools / battery-operated tools only. Minimal ground disturbance, no excavations or changes to water-courses.	Negligible	4.1.3.1
	Western Tasmania Blanket Bogs (Site ID 2527)	Ground disturbance resulting in impacts on organosoil terrain, eg: erosion	Low	Sites are avoided. Any interaction with sites (eg helicopter pad) will involve minimal ground disturbance, perforated decking and boardwalking.	Negligible	4.1.3.2
<b>4. Landscape and viewfields</b> (Consider impact of the proposal on viewfields into the site and from the site)	Halls Island contains an existing hut (circa 1955), a number of tracks, numerous tree-harvesting sites, a disused toilet site, a disused boat-slip, and other evidence of human use.	Landscape and viewfields should remain relatively unchanged. Site selection has ensured that the viewfield from the existing historic hut is maintained, and unchanged. Viewfield from the mainland looking back to the island will remain relatively unchanged due to the site location alongside a WSU forest, along	Low	Sympathetic building material selection, no reflective materials, muted-bush tones, minimal 12V lighting, natural materials where possible.	Negligible	4.1.4.1

		with sympathetic building material selection.				
<b>5. Wilderness and wild rivers</b> (impact of proposal on Wilderness quality using modified NWI mapping, any effects on wild rivers)	NWI quality is listed as high (14- 18 / 20). NWI mapping resolution does not allow accurate reference specific to Halls Island, and it is unknown whether the long history of human habitation and structures on the island were taken into account.	Low level impact Wilderness qualities may be improved by eliminating seasonal tree (firewood) harvesting by unauthorised users of the existing Halls Hut.	Low	Restrict maximum group sizes to six customers, two guides Restrict number of commercial trips to approx. 30 per year. Sympathetic building designs and scale. Adhere to strict helicopter flight path and prescriptions.	Negligible	4.1.5.1
<b>6. Threats</b> (diseases such as Phytophthora and Chytrid Fungus, introduced animals and weeds)	No weed species detected on Halls Island (see Flora and Fauna Assessment).	Orange hawkweed is listed as a potential threat to Sphagnum communities, and is known in the Derwent Bridge / Lake St Clair area.	Low	Implement 'Keeping It Clean' training provided by NRM South. The final check and disinfectant process should be applied at Derwent Bridge, prior to departure for Halls Island. Incorporate into Operations Manual.	Negligible	4.1.6.1
	Didymo, Chytrid fungus disease, platypus mucor etc.	Introduction of disease threats to the area from helicopter operations, outdoor gear, fire wood.	Mod	As above All 'fire-wood' would be manufactured e.g. briquettes	Low	
<b>7. Estuarine or Marine</b> (add broad descriptors of important features like fauna/flora)	N/A	N/A	N/A	N/A	N/A	N/A
<b>8. Water quality</b> (PEV's) (add broad descriptors of important features like fauna/flora)	Pristine water quality / CFEV values	Contamination from grey water and/or sewage. Currently the island has no toilet facilities despite history of use. The proponent will be improving this situation.  Potential for fuel spills from	Mod	Installation of complete capture sewage and greywater pods. Greywater will be back- loaded with each trip, for disposal outside of the TWWHA. Sewage will be collected annually in pods and emptied off-site. No aviation fuel will be stored on site.	Low	4.1.8.1

	helicopter, power boat usage	All boats – non motorised.		
*** denotes aspect of RAA to be considered in Stage 2 RAA approval. Actions relating to Stage 2 proposed activities are not included in this RAA approval and conditions.				



## 4.2 Cultural Values Assessment: Impacts, Benefits and Management

Cultural Values (including cultural assets, processes and systems)	General description and existing conditions. Note relevant people consulted, references to documents. List any values/assets of significance. List any surveys completed by whom and when.	Likely impact on values / assets (cultural assets, landscapes and systems, including cumulative effects). Particularly assess impact on world heritage and other significant cultural values.	Risk level (no controls)	List control options Management actions to be taken to avoid or minimise any likely negative impacts, include ongoing monitoring.	Risk level (controls)	X Ref. Action Plan
1. Aboriginal heritage values (e.g. landscapes, areas, sites, artefacts, relics, resources, WHA Aboriginal values)	Advice from Aboriginal Heritage Tasmania that the immediate on island area has a low probability of Aboriginal Heritage being present. s45 [REDACTED]	No likely impact, though positive impacts may arrive through partnerships with the Aboriginal communities and increased awareness.	No likely impact, though positive impacts may arrive through partnerships with the Aboriginal communities and increased awareness.	Engagement and involvement with the Aboriginal communities as prescribed by the AHT report (see appendix 6). Implement the AHT Unanticipated Discovery Plan should Aboriginal heritage be discovered.	Low	***
2. Historic heritage values (e.g. historic places, movable heritage or relics)	Advice from DPIPWE Natural and Cultural Heritage Division indicate the overall risk to natural values in the Walls of Jerusalem National Park is considered low.	Positive impacts include increased awareness of the European cultural history of the area, and the conservation of the historic Halls Hut.	Low	Conduct further research and promote the cultural history of the Walls of Jerusalem National Park	Negligible	4.2.2.1

\*\*\* denotes aspect of RAA to be considered in Stage 2 RAA approval. Actions relating to Stage 2 proposed activities are not included in this RAA approval and conditions.

Social Values	General description and existing conditions. Describe how the area is used and how the activity is likely to change the way the area is used. Note people consulted, references to documents. List any social values/assets of significance.	Likely impact on current social values.	Risk level (no controls)	List control options Management actions to be taken to avoid or minimise any likely impacts, include ongoing monitoring.	Risk level (controls)	X Ref. Action Plan
3. Recreational values, established uses	The existing, privately-owned Halls Island hut has been the main drive of visitation to the area since the 1970's. Usage is very low, and the hut log book lists a maximum of six visitor groups per season, often as low as two groups per season. Access is very difficult, with access from the east requiring additional permission to cross private land (trawtha makuminya property). Anecdotal access details from the land owners at trawtha makuminya also indicate single-digit visitation to the area, annually.	An improved, more formalised process for those wanting to use the private Halls Hut (which is external to this proposal). Reduced access to important European history on Halls Island	Low	Facilitate public access to the privately owned Halls Hut when appropriate (this is again external to this proposal).	Negligible	4.2.3.1
			Low	Increase accessibility to the history and artefacts relating to Halls Island and Reg Hall, through partnership with the Queen Victoria Museum and Art Gallery, Launceston.	Overall improvement on current access.	4.2.3.2
	Helicopter usage for access and servicing.	Helicopter usage in the area has also been perceived to impact on potential recreational values.	Low	Minimise helicopter use, use helicopter route as described which avoids known walking routes, and all significant recreational fishing waters. Operate where possible at minimum 1000 m altitude. Pilot and guides to observe for on-ground users, and avoid. Restrict annual trip numbers to 25 peak-season trips, and 5 winter trips.	Negligible	4.2.3.3

		<p>Cumulative effect of helicopter use and commercial operations on 'wilderness value'</p> <p>Refer to Attachment 10.</p>	Low	<p>Development site is located in an area featuring extensive history of human use, on-going use, built heritage and disturbance including prior seaplane use.</p> <p>Helicopter use for operations is minimised to less than 48 hours per annum (based on Attachment 10 estimates). Capped number of Halls Island sales per year (~30) and small group sizes are applied. Point-impacts to on-ground users limited to ~2 minutes of sound.</p>	Negligible	4.2.3.4
		Potential social impacts from interactions with other users during trips		Use adaptive management as part of the Operations Manual to avoid or bypass areas where other users are recreating. This has been proven to be effective at the proponent's other operations in the TWWHA.		
4. Leases and licences	The existing hut in Halls Island is owned by the proponent, and sited under lease. No other private leases or licences exist in the area.	New infrastructure seen as exclusive use.	Mod	Negotiate new lease over all infrastructure	Low	4.2.4.1
5. Surrounding land uses	Recreation – bushwalking and fishing. Halls Island has featured private buildings and use since 1955, this proposal continues with similar activity. Trout fishing at Lake Malbena is unremarkable (compared to waters further east). Waters	Likely impacts are very low. Current usage levels of the area are at historical lows.	Low	<p>Avoid areas where other users are recreating.</p> <p>Adhere to strict flight paths.</p>	Low	4.2.5.1

	west and north of Malbena are generally trout free.					
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### 4.3 Activity Hazards

Activity Hazards	General description of how the site is used and existing nature of hazards/risks.	Likely impact on nature and severity of hazards/risks.	Risk level (no controls)	List control options and management actions to be taken to avoid or minimise risks.	Risk level (controls)	X Ref. Action Plan
1. Occupational Health and Safety	Self- reliant recreation. Existing hazards are exposure to elements and environment	Possible injury or death due to; slips, trips and falls, exposure to elements, snake bite, construction and helicopter use.	Mod	A complete WH&S Management Plan will be developed for the construction phase, and operational phases of the development. Development of emergency response plan.	Low	4.3.1.1
2. Visitor Risk	Self- reliant recreation. Existing hazards are exposure to elements and environment	Possible injury or death due to; slips, trips and falls, exposure to elements, snake bite, construction and helicopter use.	Low	As above to manage occasional outside visitor to the site.	Negligible	4.3.2.1
3. Other – Dangerous goods, controlled waste, fire etc.	Self- reliant recreation. Historic hut accommodation – wood fire – no toilet facilities	Waste generation, wildfire, fuel and oils spills.	Mod	Outside open fires are not permitted. Accidental fires will be extinguished immediately. Construction waste and general rubbish generated onsite will be contained onsite for disposal to a Council Waste Transfer Station. Oil / fuel spills will be prevented and will be contained and cleaned up promptly if they occur.	Low	4.3.3.1

				<p>Installation of complete capture sewage and greywater pods. Greywater will be back- loaded with each trip, for disposal outside of the TWWHA. Sewage will be collected annually in pods and emptied off-site.</p>		
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#### 4.4 Community Consultation

Stakeholders	Interest Level (low, med, high)	Concern Level (low, med, high)	How was consultation performed, and stakeholders view's on the activity	Details of further consultation required or planned, if any
s45 [redacted] [redacted] [redacted] [redacted]	[redacted]	s45 [redacted] [redacted]	s45 [redacted] [redacted] [redacted] [redacted]	s45 [redacted].
[redacted] [redacted] [redacted]	[redacted]	[redacted] [redacted]	[redacted] [redacted] [redacted] [redacted]	[redacted] [redacted] [redacted] [redacted] [redacted] [redacted] [redacted]
[redacted] [redacted]	[redacted]	[redacted] [redacted] [redacted] [redacted] [redacted] [redacted]	[redacted] [redacted] [redacted] [redacted] [redacted]	[redacted] [redacted] [redacted] [redacted] [redacted] [redacted]
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[redacted] [redacted] [redacted] [redacted]	[redacted]	[redacted] [redacted] [redacted] [redacted] [redacted] [redacted]	[redacted] [redacted] [redacted] [redacted] [redacted] [redacted]	[redacted] [redacted] [redacted] [redacted] [redacted]



[illegible]

			s45 [REDACTED] t	
s45 [REDACTED] [REDACTED] [REDACTED] /	[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	s45 [REDACTED]
[REDACTED] [REDACTED] /	[REDACTED]	[REDACTED]	[REDACTED] e [REDACTED] [REDACTED] [REDACTED] [REDACTED] y	[REDACTED]
[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	g [REDACTED] p [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] y

**Supplemental Table 1: Project specifics in relation to 6.8 Commercial Tourism, Tasmanian Wilderness World Heritage Management Plan 2016 (page 150).**

The 2016 Plan outlines key criteria for commercial tourism in the TWWHA. The below table addresses these criteria:

<b>Describe how the experience is based on the values and features of the TWWHA;</b>	The focal point of this proposal is the interpretation and presentation of the cultural history and outstanding universal values of Halls Island and surrounds.
<b>Submit a case for why it should be situated within reserved land and address compatibility with existing services and infrastructure;</b>	This proposal, and the interpretation and presentation of the cultural history of Halls Island which it revolves around, is only achievable if located on Halls Island. The proposal is compatible and complimentary to the TWWHA Management Plan 2016, and guidelines for the Self-Reliant Zone.
<b>Describe how it will contribute to the guiding Vision and management Objectives for the TWWHA as articulated in the management plan</b>	The Halls Island proposal has been designed to support the identification, protection, conservation, and presentation of the World Heritage, National Heritage and other natural and cultural values of the TWWHA.  Operations will facilitate community engagement, add to the diversity and quality of experiences in the TWWHA consistent with the conservation of natural and cultural values, and further identify, protect, conserve and restore cultural values in the TWWHA.  The proposal is also compatible with the objective and aims of the Parks 21 subsidiary document.
<b>Describe how potential impacts on the legitimate enjoyment and experience by others of TWWHA features and values will be managed</b>	Any access to Halls Island has always been by a small number (less than ~12 per annum) of the public wishing to visit and use the privately owned Hall's Hut. The small number of regular users, as identified by the hut log book, will have access facilitated upon reasonable request.  Visits to Halls Island by scientists, artists, cultural researchers, members of the Aboriginal community and others will be facilitated by the proponents.  Other members of the Tasmanian community interested in access to the cultural history of Halls Island will find a significant collection relating to the hut and history at the Queen Victoria Museum and Art Gallery, Tasmania, which has been kindly donated by the proponents.  Aerial access is described in the TWWHA Management Plan as ' <i>a significant component of presentation in the TWWHA...providing opportunities to contribute to the diversity of experiences that are offered</i> '. Site selection for the proposed helicopter landing site avoid overflights of

	<p>walking routes and trout fishing waters, unnecessary conflict with other users, and the proposed capped number of trips per year avoids cumulative impacts.</p> <p>Impacts on other general users of the TWWHA will be managed through the Operations Manual, as outlined in Sections 1 and 4.</p>
<p><b>Describe how it will be constructed and/or operate in a manner compatible with the protection and conservation of World Heritage and other values</b></p>	<p>Construction and operational guidelines have been described in sections 1 and 4.</p> <p>The proponents already operate a Standing Camp in the TWWHA, and can demonstrate that the listed impact mitigation measures, walking group ratios, and camp construction / operation measures are sustainable, and compatible and beneficial to the protection and conservation of the World Heritage and other values. In particular, the proposal will lead to:</p> <ul style="list-style-type: none"> <li>- An increased awareness of the TWWHA, and the outstanding universal values and cultural history of the area</li> <li>- High quality interpretation and presentation of the TWWHA</li> <li>- Increased access to the TWWHA for researchers, artists and members of the Aboriginal community</li> <li>- All access, egress, and operations revolve around minimising interaction and impacts on other users.</li> <li>- Activities are compatible with the TWWHA Management Plan 2016</li> </ul> <p>The presentation of built heritage, such as the historic Halls Hut, is inextricably linked with its on-going conservation.</p>
<p><b>Incorporate environmentally sustainable operational practices and the use of environmentally 'best practice' goods and technologies</b></p>	<p>Best practice for this proposal include:</p> <ul style="list-style-type: none"> <li>- Complete capture grey-water and sewage</li> <li>- Buildings are minimalist in scale, and require minimal fixtures to ground</li> <li>- Infrastructure outside of the 30m x 10m Standing Camp site is minimal</li> <li>- The number of trips, and customers per trip are minimal in scale (approx. 25 trips per year), and sympathetic to the location in the TWWHA</li> <li>- The site selection is a location with previous European human activity and built heritage, and obvious long-term disturbance.</li> </ul>
<p><b>Detail any external costs resulting from the proposal including ongoing monitoring and compliance</b></p>	<p>See section 4</p>
<p><b>Demonstrate economic viability</b></p>	<p>See section 1.11 and 4</p>

## 4.5 Economic Values Assessment: Impacts, Benefits and Management

1. Economic Assessment of Options	Current Management Regime (\$)	New Management Regime (\$)
<b>Capital Costs</b>		
<b>PROJECT MANAGEMENT</b> (e.g. Salary, oncosts, expenses, travel, other)	Proponent	Proponent
<b>PLANNING, PRE-WORKS</b> (e.g. Advertising / meetings, consultants, documentation & certification, approvals: RAA & Regulatory)	Proponent	Proponent
<b>WORKS/CONSTRUCTION</b> (e.g. Materials & Supplies, labour & equipment, rehabilitation)	Proponent	Proponent
<b>TOTAL CAPITAL COST</b>	Proponent	s45
<b>Annual Operating Costs</b> (e.g. PWS labour, other labour, consultants, contractors materials & Supplies)	Proponent	Proponent
<b>NET ANNUAL OPERATING COSTS</b>	Proponent	Proponent
<b>TOTAL COSTS (Capital and Operating)</b>	Proponent	Proponent

## 2. Economic Questions

Will the project create a new asset or alter/upgrade an existing asset?	Yes
Does the project require PWS or other Government funding for infrastructure upgrades?	No
Who is / will be responsible for annual operating costs?	Proponent
What is the fund source for capital and maintenance works?	Private funding – s45
Is there any requirement for PWS involvement in ongoing management?	Annual site inspection
What are the implications of not implementing the project (in terms of assets and finance):	Funds to repair and maintain the existing heritage Halls Hut will not be received, and the important cultural asset will be impacted. s45 ; Opportunities to meet the goals for presentation and tourism in the 2016 TWWHA Management Plan, and Parks21 Partnership will be missed.

## Economic Comment (Comment on the Impacts / benefits of each option)

## Step 5 – Advice on Impact Assessment and Proposed Management

### Summary of comment received.

Part of RAA Referred to:	Name and Section	Advice and Comment	Initiating Person's / Regional Response
Supplemental Table 1	PWS Planning (Hobart), Lynne Sparrow	<p><i>Impacts from trampling</i></p> <p>Photo monitoring guide prepared by NRM South provided. Particular attention made to the clear identification of trigger points at which impacts are addressed (limits of acceptable change).</p> <p><i>Impacts on Wilderness Character</i></p> <p>Helicopter use could have negative impacts on the wilderness recreational experience of many other users (e.g. especially the many visitors who use the Cynthia Bay/Lake St Clair/Pumphouse Point vicinity). Feedback comments on past proposals for helicopter access to the TWWHA have reflected significant opposition to helicopters because they disturb 'the peace and quiet' of the TWWHA experience.</p>	<p><i>Impacts from trampling</i></p> <p>Additional cultural and natural values assessments undertaken by the Proponent will be required before approval is provided for proposed walking routes off Halls Island, including Mt Oana, s45 routes (Stage 2 activities).</p> <p>PWS will provide the proponent with the NRM South Photo Monitoring guidelines for inclusion within additional RAA assessments for Stage 2 activities.</p> <p><i>Wilderness Character</i></p> <ul style="list-style-type: none"> <li>Action included in Action Plan for proponent to adhere to 'Fly Neighbourly Advice'.</li> </ul>
Aboriginal Heritage Values	Aboriginal Heritage Tasmania, Ross Stanger	<p>s45</p> <p>AHT would therefore advise that the proponent formally contact, engage and consult with the Aboriginal Heritage Council (AHC) and the Aboriginal community to outline the details of the proposed development and any proposed plans for activities s45.</p> <p>...Engagement and consultation with the AHC, which includes members from the Tasmanian Aboriginal community...may provide further information and advice in relation to s45 and the culturally appropriate activities that can be</p>	<p>Additional cultural and natural values assessments undertaken by the Proponent will be required before approval is provided for proposed walking routes off Halls Island, including Mt Oana, s45 routes.</p> <p>Stage 2 actions:</p> <ul style="list-style-type: none"> <li>proponent formally contact, engage and consult with the Aboriginal Heritage Council (AHC) and the Aboriginal community to outline the details of the proposed development and any proposed plans for activities s45.</li> </ul>



		<p>undertaken as part of the project.</p> <p><i>Direct involvement or and collaboration with Aboriginal community</i>  ...AHT would therefore advise engagement and consultation with the AHC and Aboriginal community on the development of all cultural heritage interpretation and planned access to Country projects.</p> <p>Another key objective of the TWWHA Management Plan 2016 involves the development of strategies for secure employment opportunities for Aboriginal people in the TWWHA. While not considered within the RAA, the AHC would welcome further consideration and commitments by the proponent for the establishment of collaborative relationships and partnerships with the Aboriginal community in terms of employment and training for Aboriginal people as part of this project.</p>	<p>- proponent to engage and consult with the AHC and Aboriginal community on the development of all cultural heritage interpretation and planned access to Country projects</p> <p>PWS will provide the information from AHT to the proponent so the proponent can consider all opportunities as identified by AHT for their consideration.</p>
Natural Values	PCAB, Simon Wilcox	<p><i>Proposed tracks off Halls Island</i>  Based on desktop information, it appears that the helipad and some of these proposed tracks pass through areas of listed threatened native vegetation communities and it appears that these areas were not surveyed as part of the onground assessment by Northbarker. No information has been provided in the documentation regarding the size or form of these structures, it is PCABs understanding/assumption that the tracks will be located and designed to avoid disturbance to vegetation as much as practicable and this is supported.</p> <p><i>Increased usage of Halls Island and vegetation impacts</i>  The management of the numbers proposed should be sufficient to minimise impacts (this may need to be reviewed if any future discussions on increasing visitation further). However the suggestion to utilise minimal impact bushwalking techniques for some of the proposed surrounding walks will need to be carefully assessed against vegetation values; with these type of visitor number impacts may be lessened by creating hardened tracks.</p> <p>The avoidance and mitigation measures outlined in the Northbarker flora and fauna assessment report (dated 21/11/16) are supported.</p> <p>It is recommended that it be clearly stated that no helicopter refuelling operations or fuel storage etc. is to be undertaken on site.</p>	<p><i>General</i>  Action included in Action Plan for proponent to:</p> <ul style="list-style-type: none"> <li>• Implement all avoidance and mitigation measures outlines in the NorthBaker flora and fauna assessment report;</li> <li>• No storage of aviation fuel or undertake any refuelling operations at Halls Island helipad or surrounding area;</li> <li>• Not allow any sewage, grey water, and sediment to enter lake/streams in order to protect aquatic fauna (which has high endemicity); and</li> <li>• Not fly within 1km line-of-sight of known eagles nests and that helicopter flights do not include a 'viewing' of the nest.</li> </ul> <p><i>Geoconservation</i></p> <ul style="list-style-type: none"> <li>• Action included in Action Plan for proponent to modify the proposed helipad to Halls Island walking route to avoid degradation of the patterned mire</li> </ul>

	<p>No sewage, grey water, and sediment should be allowed to enter lake/streams in order to protect aquatic fauna (which has high endemism).</p> <p>It is recommended that, where possible, helicopters do not fly within 1km line-of-sight of known eagles nests and specifically that tours do not include a 'viewing' of the nest.</p> <p><i>Geoconservation</i></p> <p>...the proposed walking track/route to Mt Oana would skirt a patterned mire, while the helipad and access track cross another... Such mires are considered to be of national significance from a geoconservation perspective while the flora aspect is regarded an outstanding universal value... It is recommended that minor modification to the proposed Mt Oana walking track/route and to the helipad location be made to avoid degradation of these mires.</p> <p><i>Threatened flora &amp; fauna</i></p> <p><i>Halls Island</i></p> <p>...no significant vegetation-related issues for Hall's Island itself, provided the proponent agrees to adopt, in full, the recommendations and mitigation measures outlined in the northbarker flora and fauna assessment report (dated 21/11/16) for protection of the two threatened vegetation communities (Sphagnum peatland and Athrotaxis selaginoides rainforest), fire sensitive vegetation (MSP, RKP and RSH) and flora species (Pherosphaera hookeriana, Athrotaxis selaginoides, Athrotaxis cupressoides, Diselma archeri) identified as present on the island.</p> <p>It is recommended that threatened plants (Mount Mawson pines) near to the work areas should be flagged to avoid any inadvertent disturbance during construction. The island landing should be located such that these plants do not need to be removed, but if this is not practicable or safe, and any of these threatened pines need to be taken, then a permit to take under the <i>Threatened Species Protection Act 1994</i> will be required from PCAB prior to any impact.</p> <p>Staff and contractors working onsite should be made aware of the location of threatened plants and threatened native vegetation communities to ensure no inadvertent impact to these natural values.</p>	<p>Additional cultural and natural values assessments undertaken by the Proponent will be required before approval is provided for proposed walking routes off Halls Island, including Mt Oana, S45 routes (Stage 2 activities).</p> <p>PWS will provide the proponent with the advice regarding geoconservation features as outlined by PCAB for inclusion within additional RAA assessments for Stage 2 activities.</p> <p><i>Threatened flora &amp; fauna</i></p> <p>Action included in Action Plan for proponent to</p> <ul style="list-style-type: none"> <li>• Make staff and contractors working on Halls Island aware of the location of threatened plants and threatened native vegetation communities to ensure no inadvertent impact to these natural values.</li> <li>• flag work area to avoid inadvertent disturbance of threatened plants (Mount Mawson pines) during construction; and</li> <li>• locate the Halls Island landing such that these plants do not need to be removed, but if this is not practicable or safe, and any of these threatened pines need to be taken, then a permit to take under the <i>Threatened Species Protection Act 1994</i> will be required from PCAB prior to any impact.</li> </ul> <p><i>Weeds &amp; Disease</i></p> <p>Action included in Action Plan for proponent to</p> <ul style="list-style-type: none"> <li>• develop a hygiene plan developed in accordance with DPIPW (2015). <i>Weed</i></li> </ul>
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		<p>PCAB requests that onground mapping of the vegetation communities undertaken by northbarker should be provided to the NVA, if this has not already been done, to inform TASVEG mapping.</p> <p><i>Weeds &amp; Disease</i></p> <p>PCAB recommends that as a condition of any approvals that the proponent be required to have a biosecurity hygiene plan developed (and implemented)...</p> <p>Neoprene waders are a significant biosecurity risk (e.g. didymo) and staff and visitors involved with this proposal should be required to properly clean, dry and disinfect their waders prior to accessing the area for fishing, especially if people have been fishing overseas. This also applies to any other aquatic-related equipment and clothing (e.g. kayaks and fishing gear).</p>	<p><i>and Disease Planning and Hygiene Guidelines - Preventing the spread of weeds and diseases in Tasmania</i> and should cover construction and operational phases of the project, quality control checks during construction and operations (and who will monitor compliance with agreed biosecurity measures) and a list of management actions that will be implemented (and by whom) if any weeds or other threats are identified during construction or operations. Issues/threats to consider should include plant seeds, invertebrates, aquatic alga and pathogens, plant pathogens and the like; and</p> <ul style="list-style-type: none"> <li>• require staff and visitors to properly clean, dry and disinfect their waders prior to accessing the area for fishing, especially if people have been fishing overseas. This also applies to any other aquatic-related equipment and clothing (e.g. kayaks and fishing gear).</li> </ul>
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## Step 6 – Activity Plan

The Activity Plan shows the key actions required to ensure that short and long term high risk aspects of the activity are minimised or addressed and legislative requirements are met. These are actions that are critical to implement to achieve the environmental, social and economic outcomes. Use the activity reference column to cross-reference actions with the Impact Assessment and Proposed Management table – Step 4.

The Activity Plan details the critical actions that have emerged from steps 1, 4 and 5. Only list important actions not day-to-day or operational tasks. Make sure evaluation and reporting tasks (Step 10) are listed (see Step 1, part 8 for success indicators).

Activity #	Activity Details	Activity Controls	Responsible Officer	Start Date	Notes
4.1.1.1	Natural values Flora Trampling	Adopt all mitigation measures prescribed in the Avoidance of trampling (on-island) within the Flora and Fauna assessment: A. Avoid routes through MSP's, or facilitate passage across MSP's by installing raised, perforated FRP boardwalking. Risk is mitigated. B. Education and supervision during trips. C. Siting of standing camp among ORO or WSU communities. Create visitor exclusion zones, excluding visitors from sensitive communities MSP, RKP, and Pherosphaera hookeriana communities (see Map 6, appendices)			
4.1.1.2	Natural values Flora Fire mitigation	Fire risk mitigation – Electric or gas heating in Standing Camp – no open flames, Smoking only permitted in designated area.			
4.1.1.3	Natural values Flora MSP communities south west of Halls Hut	Install boardwalk or rock re- enforcement along existing impact.			
4.1.1.4	Natural values Flora	Ensure on-island routes/tracks avoid this species. Where existing routes pass by this species (near the natural rock jetty),			

	<i>Mount Mawson Pine</i>	use short lengths of boardwalk to ensure clear walking route that avoids plant species. Education and supervision to re-enforce impact mitigation. Utilise no-access areas for visitors, see appendix Halls Island Maps, Map 6, for site plan including exclusion zones.			
4.1.2.3	<i>Natural values</i> <i>Fauna</i> <i>Clarence Galaxias</i>	Commercial trips will avoid this high plateau habitat area.			
4.1.2.4	<i>Natural values</i> <i>Fauna</i> <i>Other fauna</i>	Education and supervision of customers to ensure no feeding or petting of animals. Ensure all food wastes etc are properly stored.			
4.1.3.1	<i>Natural values</i> <i>Geoconservation</i> <i>Central Highlands Cenozoic Glacial Area (Site ID 2953) &amp; Central Plateau Terrain (Site ID 2684)</i>	Camp will be installed using hand tools / battery-operated tools only. Minimal ground disturbance, no excavations or changes to water-courses.			
4.1.3.2	<i>Natural values</i> <i>Geoconservation</i> <i>Western Tasmania Blanket Bogs (Site ID 2527)</i>	Sites are avoided. Any interaction with sites (eg helicopter pad) will involve minimal ground disturbance, perforated decking and boardwalking.			
4.1.4.1	<i>Natural values</i> <i>Landscape &amp; Viewfield</i> <i>Halls Island</i>	Sympathetic building material selection, no reflective materials, muted-bush tones, minimal 12V lighting, natural materials where possible.			
4.1.5.1	<i>Natural values</i> <i>Wilderness &amp; wild rivers</i> <i>NWI 14+</i>	Restrict maximum group sizes of six customers, two guides Restrict number of commercial trips to 30per year. Sympathetic building designs and scale. Adhere to strict helicopter flight path and impact minimisation prescriptions in Attachment 10.			
4.1.6.1	<i>Natural values</i>	Implement 'Keeping It Clean' training provided by NRM South. The final check			

	<i>Threats</i> <i>Weeds</i>	and disinfectant process should be applied at Derwent Bridge, prior to departure for Halls Island. Incorporate into Operations Manual.			
4.1.8.1	<i>Natural values</i> <i>Water quality</i> <i>CFEV values</i>	Installation of complete capture sewage and greywater pods. Greywater will be back-loaded with each trip, for disposal outside of the TWWHA. Sewage will be collected annually in pods and emptied off-site.			
4.2.2.1	<i>Cultural Values</i> <i>Historic Heritage values</i>	Conduct further research and promote the cultural history of the Walls of Jerusalem National Park			
4.2.3.1	<i>Social values</i> <i>Recreational values, established uses</i>	Facilitate public access to the privately owned Halls Hut when appropriate (this is again external to this proposal).			
4.2.3.2	<i>Social values</i> <i>Recreational values, established uses</i>	Increase accessibility to the history and artefacts relating to Halls Island and Reg Hall, through partnership with the Queen Victoria Museum and Art Gallery, Launceston.			
4.2.3.3	<i>Social values</i> <i>Recreational values, established uses</i> <i>Helicopter use</i>	Minimise helicopter use, use helicopter route as described which avoids known walking routes, and all significant recreational fishing waters. Restrict annual trip numbers during peak season to approx. 25 trips. Adhere to impact minimisation prescriptions in Attachment 10			
4.2.3.4	<i>Social values</i> <i>Recreational values, established uses</i> <i>Social impacts</i>	Use adaptive management as part of the Operations Manual to avoid or bypass areas where other users are recreating. This has been proven to be effective at the proponents other operations in the TWWHA.			
4.2.4.1	<i>Leases &amp; Licences</i>	Negotiate new lease over all infrastructure			
4.2.5.1	<i>Surrounding land uses</i>	Avoid areas where other users are recreating.			



		Adhere to strict flight paths.			
4.3.1.1	Activity Hazards Occupational Health and Safety	A complete WH&S Management Plan will be developed for the construction phase, and operational phases of the development.			
4.3.2.1	Activity Hazards Visitor Risk	A complete WH&S Management Plan will be developed for the construction phase, and operational phases of the development.			
4.3.3.1	Activity Hazards Other – Dangerous goods, controlled waste, fire etc. Historic hut accommodation – wood fire – no toilet facilities	<p>Outside open fires are not permitted. Accidental fires will be extinguished immediately.</p> <p>Construction waste and general rubbish generated onsite will be contained onsite for disposal to a Council Waste Transfer Station.</p> <p>Oil / fuel spills will be prevented and will be contained and cleaned up promptly if they occur.</p> <p>Installation of complete capture sewage and greywater pods. Greywater will be back- loaded with each trip, for disposal outside of the TWWHA. Sewage will be collected annually in pods and emptied off-site.</p>			

For projects that involve a project team detail the governance structures below. For simple PWS projects just list the responsible officer.

#### Governance

PWS I/C

## Step 7 – External Assessment

If the activity *does* require external assessment (as identified at Step 3), this takes place at this step. At this point the assessment from a PWS perspective is complete and PWS is signalling it plans to approve the Activity Plan (for a level 2-3 RAA, or a DPEMP for a Level 4 RAA) subject to any further conditions that are imposed by external assessment.

If the activity *does not* require external assessment, go direct to Step 8.

**PWS will refer/recommend the referral of the proposal for assessment under the process/es below** (check those that apply):

- ☒ LUPAA (Required)  
☒ EPBC (EPBC Referral, General Manager decides whether to refer)  
☐ Other \_\_\_\_\_ PWS I/C

**ENDORSED**  
**Approved for External Assessment by:**

**Signed (RM):** PWS RM

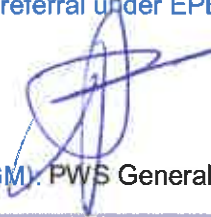


**Date:** 13 March 2018

**Name:** Chris Colley

**Position:** Regional Manager North

Note for a referral under EPBC, EPBC or a DPEMP the approval of the General Manager is also required.



**Signed (GM):** PWS General Manager

**Name:** Jason Jacobi

**Date:** 14/3/18

Add results of external assessments here.

Add any changes or new conditions/controls to the Activity Plan (Step 6) that are required as a result of these assessments. State which conditions have been added/modified in the Notes column and also state the assessment process that required the change/addition.

Any Further Comment:

PWS I/C

## Step 8 – Draft Final Determination

☒ **Activity Approved with conditions** (Can be implemented subject to the conditions in the Activity Plan and any additional or changed conditions listed below.)

### Stage 1 activities

This RAA proposal has been broken into two stages of activities. Stage 1 has been approved, whilst stage 2 activities require additional assessment and approval.

Activities approved with the following conditions include (Stage 1);

- All developments and activities on Halls Island;
- Helipad;
- Walking route between the helipad and Halls Island;
- The use of non-motorised watercraft on Lake Malbena; and
- Helicopter flight path.

The following conditions apply

Condition Title	Condition details
Wilderness Character	<p>Prepare and comply with an Operations Plan to include:</p> <p>‘Fly Neighbourly Advice and identified flight path between Lake St Claire and helipad. Conditions are also to be incorporated into the lease and licence.</p> <p>Adhere to helicopter use prescriptions in Attachment 10 to minimise point-impacts</p> <p>Final building design, colours and materials to be approved by PWS prior to submitting DA.</p>
Flora & fauna	<p>Implement all avoidance and mitigation measures outlines in the NorthBaker flora and fauna assessment report;</p> <p>Prepare a Construction Environmental Management Plan (CEMP) covering the construction phase, to be approved by PWS.</p>
Flora & fauna	<p>Through the CEMP, make staff and contractors working on Halls Island aware of the location of threatened plants and threatened native vegetation communities to ensure no inadvertent impact to these natural values.</p>
Flora & fauna	<p>Flag work area to avoid inadvertent disturbance of threatened plants (Mount Mawson pines) during construction</p> <p>To be included in CEMP</p>
Flora & fauna	<p>Locate the Halls Island landing such that these plants do not need to be removed, but if this is not practicable or safe, and any of these threatened pines need to be taken, then a permit to take under the <i>Threatened Species Protection Act 1994</i> will be required from PCAB prior to any impact.</p>
Flora & fauna Helicopter use	<p>Not fly within 1km line-of-sight of known eagles nests and that helicopter flights do not include a ‘viewing’ of the nest. (to be included in Operations Plan)</p>

CFEV Values	<p>Not allow any sewage, grey water, and sediment to enter lake/streams in order to protect aquatic fauna (which has high endemicity)</p> <p>Specific management of sewage and grey water to be addressed in Operations Plan.</p>
Geoconservation	Modify the proposed helipad to Halls Island walking route to avoid degradation of the patterned mire
Weeds & Disease	Develop a hygiene plan developed in accordance with DPIPW (2015). <i>Weed and Disease Planning and Hygiene Guidelines - Preventing the spread of weeds and diseases in Tasmania</i> and should cover construction and operational phases of the project, quality control checks during construction and operations (and who will monitor compliance with agreed biosecurity measures) and a list of management actions that will be implemented (and by whom) if any weeds or other threats are identified during construction or operations. Issues/threats to consider should include plant seeds, invertebrates, aquatic alga and pathogens, plant pathogens and the like. Include actions in the operations plan.
Weeds & Disease	Require staff and visitors to properly clean, dry and disinfect their waders prior to accessing the area for fishing, especially if people have been fishing overseas. This also applies to any other aquatic-related equipment and clothing (e.g. kayaks and fishing gear). Include requirements in the operations plan.
Activity Hazards	Storage of aviation fuel or undertaking any helicopter refuelling operation is not permitted at the Halls Island helipad or nearby area.
Operations Plan	<p>Operations plan is to be prepared and submitted to PWS for approval prior to operations commencing. The operational plan provides workers a clear picture of their tasks and responsibilities necessary to control negative impacts and maximise benefits of the activity covering post-construction and operational phases. The operations plan should cover:</p> <ul style="list-style-type: none"> <li>- Operating procedures and maintenance tasks required to manage risks to the environment and the safety of workers and guests (e.g. bushfire risks, tree and limb fall risks).</li> <li>- Guide induction and training</li> <li>- Approved walking tracks that can be used as part of the camps operation (e.g. guided walks)</li> <li>- The means of access to and from the camp.</li> <li>- Any camp set-up and breakdown procedures, as well as methods of transporting camping structures and equipment to and from the site.</li> <li>- Type, frequency and responsibility for monitoring</li> <li>- Frequency and responsibility of reporting</li> </ul>

☒ **Activity Not Approved** (Activity cannot be implemented)

Why not approved	Details
<input type="checkbox"/> The proposed activity is likely to cause unacceptable environmental impacts.	
<input type="checkbox"/> The proposed activity is likely to cause unacceptable social impacts.	
<input type="checkbox"/> The proposed activity is likely to cause unacceptable economic	

impacts.

## Stage 2 Activities

Activities presented within this RAA that require further assessment prior to approval include:

- proposed walking routes to Mt Oana;
- s45 [REDACTED]; and
- any additional walking routes (excluding walking route between Helipad and Halls Island).

In order to undertake the assessment of stage 2 activities all walking routes to Mt Oana, Mary Tarn and any other routes to be used for commercial operations the proponent will need to identify potential impact on natural and cultural including social and recreational values and actions to control or minimise adverse impacts.

With regard to Aboriginal heritage, the proponent must formally contact, engage and consult with the Aboriginal Heritage Council (AHC) and the Aboriginal community to outline the details of the proposed development and any proposed plans for activities including site visits; and

1. proponent to engage and consult with the AHC and Aboriginal community on the development of all cultural heritage interpretation and planned access to Country projects.

☒ Other – additional assessment required

Any Further Comment:  
PWS I/C

Authorised by:

**Signed (RM):** PWS RM

**Date:** PWS RM

**Name:** PWS RM

**Position:** PWS RM

Note for a proposal referred under EPBC or a level 4 (DPEMP) RAA the approval of the General Manager is required.

**Signed (GM):**

**Name:** PWS GM

Date: PWS GM

## Step 9 – Notification and Implementation

**PWS proposals:** An approved RAA indicates to staff the proposal can be implemented, subject to any conditions stated in the approval at Step 8.

**External proposals:** the PWS provides written authority including any conditions to external proponents. Following notification and the fulfilment of any pre-conditions the activity proceeds.

## Step 10 – Report and Evaluation

At completion of works a final report and evaluation of the project is completed. This is to be completed within three months of the project finishing using the table below:

### Final Report and Evaluation

Report Elements	Report Details
Start Date	PWS I/C
Finish Date	PWS I/C
Estimated Cost	PWS I/C
Actual Cost	PWS I/C
Were all conditions of approval complied with? Detail and explain any variations.	PWS I/C
Were all control actions implemented successfully. Detail and explain any variations.	PWS I/C
Were the outputs (1.7) achieved?	PWS I/C
Were the outcomes (1.6) achieved or are they on track to be achieved	PWS I/C
Are any additional works or monitoring required?	PWS I/C
Further Comment	PWS I/C

### Evaluation of project by Regional Manager/Branch Manager

- ☐ Project Complete  
☐ Project Successful  
☐ Further Action Required:

PWS I/C

**Signed (RM):** PWS RM

**Date:** PWS RM

**Name:** PWS RM

**Position:** PWS RM



## Attachment 10

**Halls Island – Amendments and further information in relation to helicopter use. Prepared by the Proponent 11/01/2017 for inclusion in the Halls Island RAA.**

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Present the below as a new attachment in appendix thank you

**Attachment 10: Notes on Helicopter use and impact minimisation. (please add to the RAA as a new attachment)**

### **10.a Usage levels**

Required usage levels have been designed to minimise overall use, mitigate any point-impacts to other users in the TWWHA, and in doing so protect the wilderness character of the TWWHA.

Each guided package to Halls Island requires the capacity of two helicopters in order to deliver or retrieve customers and staff. The most common helicopter used for such purposes in Tasmania are the B2/B3 Squirrel, which take 5 passengers and the pilot.

Extrapolating the above, each guided package to Halls Island operating at a capacity 6+2 ratio would require two helicopter return trips to deliver customers and staff, and a further two helicopter return trips to deliver customers and staff back to Derwent Bridge some four days later. Each return trip is approximately 24 minutes air time (12 minutes each way), which equates to a maximum required airtime of ~96 minutes per guided package (4 x 24 minutes).

The capacity to offer up to 30 guided packages per year, at 96 minutes total flight time each, results in a maximum flight usage level of 2880 minutes, or 48 hours, per annum.

### **10.b Point impacts**

It is important to quantify the level of usage in terms of its potential effect on other users in the area, and the overall potential impact on the 'wilderness character' of the TWWHA.

To the user on the ground, each helicopter trip would produce a point-impact: a specific noise footprint and potential visual impact to those within audible / visual range of the flight path. A brief desktop study of helicopter sound-monitoring studies indicates that a discernible noise footprint is detectable within an approximate 4km lateral distance of a B2/B3 Squirrel helicopter. With the recommended manufacturer's flight speed of just over 200km/h, we can then determine that each flight would potentially create a point-impact (noise footprint and visual impact) of a maximum 2 minutes per trip, in the unlikely event that a user is *directly* under the flight path. This noise footprint when graphed is a bell-shaped curve, with maximum noise experienced when directly overhead, graduating to no noise at either end of the 4km lateral distance.

By implementing recommended FNA strategies including flying at 1000m+ altitude, using the selected flight corridor which avoids walking routes and Wilderness Zones, by following the eastern periphery of the TWWHA, and by ensuring that the pilot and passengers are to note any other users located in the TWWHA and implement avoidance measures, the likelihood of any other user experiencing more than one <2 minute point-impact is extremely unlikely, ensuring the protection of the wilderness character and integrity of the TWWHA.

### **10.c. Impact Mitigation Measures**

The FNA (Fly Neighbourly Advice) developed for the Halls Island includes a recommended flight altitude of 1000metres+, which reduces the maximum point-impact of any noise. A desktop study of previous papers relating to helicopter use suggest that at this altitude, noise from the B2/B3 Squirrel is reduced from ~75dB, to somewhere

around 60dB. This in turn also decreases the radius of impact along the flight path, to a ~4km lateral distance.

The flight corridor itself has been designed to ensure that no walking routes are crossed, and the route itself is to the eastern periphery of the TWWHA. This positioning prevents any point-impact on Wilderness Zones in the TWWHA, or on any walking routes/tracks in the TWWHA.

Wind direction is a recommended consideration from the B2/B3 Operators Manual, when minimising noise impacts. As the regular and predominant winds in the TWWHA feature a dominant westerly influence, once again any aircraft noise is carried towards/across the eastern boundary of the TWWHA, and away from other potential users and sensitive areas such as Wilderness Zones.

For operations departing Derwent Bridge, take-offs and landings will occur in the direction of the noisiest land route (Lyell Hwy) as per the helicopter manufacturers recommendations on impact mitigation. Take-off and landings at the Halls Island end of the flight corridor will again follow manufacturers' recommendations on impact mitigation by taking-off to the right, while the natural topography of the location will enhance lateral attenuation and minimise the transmission of noise produced at take-off.

During each flight, the pilot and passengers (guides) are to note any other users located under the flight path in the TWWHA, and avoid overflying these positions on the return trip, again minimising any inadvertent direct overflight and associated point-impact on users to a single ~2 minute event or less.

#### 10.d. Summary

In summary, careful flight-path selection combined with the documented low-usage of the area ensures that it is unlikely that other users will be over-flown by helicopter operations relating to Halls Island. In the unlikely event that this does occur, by using the Halls Island specific FNA prescriptions, the overall potential impact on wilderness values to other users will be minimised to a ~2 minute, once-off point-impact. Due to the location of the flight corridor, there are no anticipated impacts to any Wilderness Zones in the TWWHA.

Further references:

[http://www.ricondoprojects.com/Heliport/D\\_Noise.pdf](http://www.ricondoprojects.com/Heliport/D_Noise.pdf)

Flight Manual AS350 B3e – 9.9 Noise Reduction

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#### Changes to Supplementary Table 1

Supplemental Table 1: Project specifics in relation to 3.31, Required assessment through the RAA process, Tasmanian Wilderness World Heritage Management Plan 2016 (page 82).

*The assessment process must identify how any impacts on World Heritage values will be managed or mitigated. At 8a Potential impacts on 'wilderness character'.*

Mitigation/Management measures, please insert a single line in the RH column:

Through adopting the FNA and other minimisation strategies, any potential point-impacts (noise/visual) on other users in TWWHA within ~4km lateral distance of the flight path will be strictly limited to a once-off ~2 minute event.

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#### Changes to Supplementary Table 2

Changes to Supplemental Table 2: Project specifics in relation to 6.8 Commercial Tourism, Tasmanian Wilderness World Heritage Management Plan 2016 (page 150).

*Describe how potential impacts on the legitimate enjoyment and experience by others of TWWHA features and values will be managed. Alter paragraph four to read:*

Aerial access is described in the TWWHA Management Plan as 'a significant component of presentation in the TWWHA...providing opportunities to contribute to the diversity of experiences that are offered'. It should be noted that the TWWHA management plan does not allow for aerial access to remote areas with relatively high use (such as the Western lakes around the Nineteen Lagoons), or aerial access to the Wilderness Zone. As a result, the only aerial access permitted on the eastern side of the Central Plateau is the southern area between Lake St Clair and the Pine River valley, within which Lake Malbena is located. Considering the low usage of the area, and by avoiding fly-overs of popular walking routes, flight-corridor location to the eastern edge of the TWWHA, and by adopting Fly Neighbourly practices such as +1000m altitude, social impacts of the proposal can be managed/mitigated, and restricted to once-off point-impacts of ~2 minutes or less in the unlikely case of other users being within 4km lateral distance of the flight path.

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### **RAA amendment 1 of 3**

Page 8, 1.3.3 amendment (needs to be inserted):

Helicopter use:

- Helicopter use will be required, facilitating up to a maximum 30 commercial trips (arrivals / departures) per year.

The only aerial access permitted by the TWWHA Management Plan on the eastern side of the Central Plateau is outside of areas of regular visitor use and/or Wilderness Zones, in the southern area between Lake St Clair and the Pine River valley, in which Lake Malbena is located. Social impacts and potential impacts to the wilderness values of the area are managed/mitigated by considering the (i) very low usage of the selected area by walkers, (ii) avoiding fly-overs of walking routes, (iii) the chosen flight corridor is sighted along the eastern periphery of the TWWHA, and by (iv) adopting fly-neighbourly practices such as 1000m+ cruising altitude.

Due to helicopter seating configurations (maximum 5 pers + pilot), the heli-use required to facilitate up to 30 guiding packages per year is in vicinity of 60-120 return heli-trips per annum. To put this in context, the approximate air-time required for each trip is 12 minutes each direction to/from Derwent Bridge (preferred departure point), equating to a total flight time of between 25 and 44 hours per year at capacity.

Noise and visual impacts of the helicopter flights are further mitigated by the FNA (Fly Neighbourly Advice) prescriptions attached to the RAA, which include a minimum flight altitude of +1000m where possible, a flight corridor on the eastern boundary of the TWWHA which avoids all recognised walking routes and formed camping areas, and a flight route which is located to maximise its' distance from the Wilderness Zone, and careful observation by pilot and passengers (guides) of any independent walkers, and take measures to avoid disturbance of those walkers.

It is noted that with reference to the possible impact of helicopter use to 'Wilderness Values' in the TWWHA, that the most important factor to impact is the length of any *point-impact* (noise or visual) to other users within the footprint of the flight corridor. This point-impact is estimated to be a minimal 2 minutes over any trip (see attachment 11 in appendices for further information), and through implantation of the FNA and avoidance measures, any users should only be impacted by one trip, 2 minutes in duration, in total.

See appendices for attachment 10: Notes on Helicopter use and impact minimisation for further information.

**RAA amendment 2 of 3.**

Page 29, 4.1.5 (needs inserting) re impact minimisation strategy, insert 'flight altitude of +1000m'

**RAA amendment 3 of 3**

Page 35 4.2.3 (needs inserting) re cumulative effects on recreational and wilderness values: Insert flights are carried out at altitude of +1000m where possible, and flight corridor has been chosen to avoid areas of regular use, including walking routes and camping areas.

Halls Island RAA / EPBC Supplemental Tables 1 & 2 – Prepared by Daniel Hackett

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**Statement on Wilderness Character**

Halls Island has featured a permanent private hut since 1956, along with annual human habitation for up to eight-weeks per year. Prior to recreational use, the area was used to graze sheep, as evidenced by the remains of a stone chimney ~2 km's east of Lake Malbena, and shepherd's maps in possession of the proponent.

Since 1955, access to Lake Malbena has been through a range of means: The original hut materials were brought in by plane-drop and pack-horse, while annual visitation was facilitated by foot, by horse from 1940's to late 1970's, Haflinger 4wd, and sea-plane during the 1970's. Canoes and boats stored at Halls Island were used to access and explore the broader surrounding areas from Travellers Range and the Mersey Valley in the west, to the Pine Valley in the north, and back to Malbena for the past sixty years. These expeditions led to the creation of the first maps of the area, and Reg Halls was responsible for in excess of twenty place names in the Walls of Jerusalem National Park.

In relation to 'wilderness character', Halls Island is consequently not remote from settlement. Apparent Naturalness has been altered by the built heritage, and various historical cairned and formed walking routes braiding through the area from Lake Malbena, all the way east to Lake Olive. The wilderness value of 'time remoteness' is a subjective measurement – historically, by horse, sea-plane or 4wd, Halls Island and surrounds have been comparatively easily accessed for close to a century. It has only been since the late 1980's that access has been restricted to foot-access only from Lake Olive, and access has been a ~6 hour hike.

**Supplemental Table 1: Project specifics in relation to 3.31, Required assessment through the RAA process, Tasmanian Wilderness World Heritage Management Plan 2016 (page 82).**

The below table outlines key criteria for assessment through the RAA process.

The assessment process must identify the World Heritage Values likely to be affected by the proposal.	
	<p><b>1) OUV's representing the major stages of earth's evolutionary history:</b></p> <ul style="list-style-type: none"> <li>a. Potential impacts from fire to relic biota with links to ancient Gondwanan biota including endemic conifers.</li> <li>b. Potential impacts to soils from erosion (eg blanket bogs, peatlands)</li> </ul> <p><b>2) OUV's representing significant ongoing geological processes, biological evolution and man's interaction with his natural environment</b></p> <ul style="list-style-type: none"> <li>a. Potential impacts from erosion to blanket bog and peat soil sites where processes of hydrological and geomorphological evolution are continuing in an uninterrupted natural condition</li> <li>b. Potential impacts from the introduction of introduced plant and animal</li> </ul>

	<p>species</p> <ul style="list-style-type: none"> <li>c. Potential impacts to bolster heaths (cushion plants) from trampling</li> <li>d. Potential impacts on conifers of extreme longevity (Pencil pine, King Billy pine)</li> <li>e. Potential impacts on invertebrate groups of extraordinary diversity</li> </ul> <p><b>3) OUV's representing superlative natural phenomena, formations or features:</b></p> <ul style="list-style-type: none"> <li>a. Potential impacts on the relatively undisturbed landscape from infrastructure and use</li> </ul> <p><b>4) OUV's of the most important and significant habitats where threatened species of plants and animals of outstanding universal value from the point of view of science and conservation still survive:</b></p> <ul style="list-style-type: none"> <li>a. Potential impacts on rainforest communities from fire</li> <li>b. Potential impacts on plants species of conservation significance by trampling. (<i>Pterosphaera hookeriana</i>).</li> <li>c. Potential impacts on plant communities' of significance (<i>sphagnum</i> peatland, Highland <i>poa</i> grassland, buttongrass moorland, <i>Athrotaxis</i> selaginoides rainforest) from trampling and introduction of introduced plant species</li> </ul> <p><b>5) OUV's bearing unique or at least exceptional testimony to a civilisation which has disappeared:</b></p> <ul style="list-style-type: none"> <li>a. Potential impacts to §45</li> </ul> <p><b>6) OUV's of outstanding examples of traditional human settlement which is representative of a culture which has become vulnerable under the impact of irreversible change:</b></p> <ul style="list-style-type: none"> <li>a. Potential impacts to §45</li> </ul> <p><b>7) OUV's related to the events or with ideas or beliefs of outstanding universal significance:</b></p> <ul style="list-style-type: none"> <li>a. Potential impacts to §45</li> </ul> <p><b>8) Impacts on general 'wilderness character':</b></p> <ul style="list-style-type: none"> <li>a. Potential impacts on wilderness character, including remoteness from settlement, apparent naturalness,</li> </ul>
<b>The assessment process must identify how those values might be affected</b>	<ul style="list-style-type: none"> <li>1a. Potential impacts of wildfire – ignition sources within new development</li> <li>1b. Potential impacts of trampling and/or erosion, track formation</li> <li>2a. Potential impacts of trampling and/or erosion, track formation</li> <li>2b. Potential impacts from the introduction of exotic flora or fauna species</li> <li>2c. Potential impacts of trampling/erosion</li> </ul>



	<p>2d. Potential impacts from wildfire – ignition sources within new development</p> <p>2f. Potential impacts on invertebrate groups of extraordinary diversity (eg: stag beetles) due to disturbance during construction</p> <p>3a. Potential impacts from the (i) installation of infrastructure, and (ii) increased use of the area</p> <p>4a. Potential impacts of wildfire – ignition sources within new development</p> <p>4b. Potential impacts from trampling</p> <p>4c. Potential impacts from (i) trampling/erosion, (ii) ignition sources within new development, or the introduction of exotic flora species (primarily orange hawkweed <i>Hieracium aurantiacum</i> found in the Derwent Bridge / Lake St Clair area)</p> <p>5a. Potential impacts from culturally inappropriate use</p> <p>6a. Potential impacts from culturally inappropriate use</p> <p>7a. Potential impacts from culturally inappropriate use</p> <p>8a. Potential impacts on 'wilderness character', including Remoteness from Settlement, Apparent Naturalness, Biophysical Naturalness and Time Remoteness.</p>
<b>The assessment process must consider direct, indirect and cumulative impacts on World Heritage Values</b>	<p>Potential direct impacts listed above.</p> <p>Potential indirect and cumulative impacts on World Heritage Values are negligible. The activities and actions proposed are precise, well defined, and unlikely to have significant indirect or cumulative impacts on World Heritage Values.</p> <p>With specific reference to helicopter use, by using the prescribed flight path adjacent to the eastern boundary of the TWWHA, minimising number of flights, and using the impact mitigation measures outlined in attachment 10, indirect impacts are minimised.</p>
<b>The assessment process must identify how any impacts on World Heritage values will be managed or mitigated.</b>	<p>1a, 2d, 4a, 4c Potential impacts of wildfire – ignition sources within the new development. Mitigation/management action:</p> <ul style="list-style-type: none"> <li>- Install gas or electric heating only. No wood fires in new development.</li> <li>- Smoking by guests will not be encouraged. However, should guests wish to smoke a safe smoking zone will be established at the overnight camp site. Cigarette butt retainers will be issued to smoking guests</li> </ul> <p>1b, 2a, 2c, 4c Potential impacts from trampling/erosion. Mitigation/management action:</p> <ul style="list-style-type: none"> <li>- Restrict group size to 6+2.</li> <li>- Restrict number of trips to 25 regular trips + 5 winter trips</li> </ul>

- Use minimal impact bushwalking techniques including fan-out on open areas, and traversing the hard edges between plains and forests.
- Avoid traversing susceptible poor drained habitats including sphagnum, blanket bogs and wetlands.
- Educate customers on arrival about trampling, and highlight susceptible habitats.
- Implement customer exclusion zones on-island (see map 5), protecting susceptible flora communities
- Establish current benchmark conditions of all potential walking routes identified in maps 3 and 4. Upon commencement of operations, monitor all off-island walking activities by GPS, and report quarterly for review at 'Protocol Meetings' as defined by the Lease/Licence. If required, an independent flora and fauna specialist may be nominated by PAWS to monitor these routes periodically.

4c Potential impacts from the introduction of exotic flora, fauna, pathogens.

Mitigation/management action:

- Adopt the 'Keep It Clean' field hygiene protocol's (developed by NRM South and adopted by DPIPWE as best practice). The proponent is an accredited 'Keep it Clean' operator
- Implement check/clean/dry/disinfect actions prior to entering the TWWHA, and each morning on-island. No wet / soiled gear to be brought into the TWWHA. A key feature of this operation will be the emphasis on biosecurity with all guests and guides. Full gear checks (including checking of Velcro and pockets of jackets, gaiters etc) will be adopted before entering aircraft at Lake St Clair.
- Using helicopter to transport guests to the site will ensure the maximum biosecurity is adopted. Helicopters are hygienically very clean machines that must be free of soil and vegetation debris at all times. Because they are technically advanced aircraft that require the utmost cleanliness to be operating within the strict CASA guidelines, there is very little risk of transfer of exotic species.

5a, 6a, 7a Potential impacts from culturally inappropriate interpretation.

Mitigation/Management action:

- Use interpretation created in partnership with Tasmanian Aboriginal community members, specifically relating to the proponent's operations and the s45 [REDACTED].

	<p>8a Potential impacts on 'wilderness character'. Mitigation/Management measures:</p> <ul style="list-style-type: none"> <li>- Use a flight path that avoids any prolonged over-flight of the Wilderness Zone</li> <li>- Adopt fly neighbourly practices</li> <li>- Careful observation by pilot of any independent walkers and measures taken to avoid disturbance of those walkers.</li> <li>- Use flight path along the eastern periphery of the TWWHA. Proportionate impact is minimised.</li> <li>- Built-infrastructure to be located in an area with existing human habitation / structures and extensive history of use.</li> <li>- Built-infrastructure to be located in area of modified 'apparent naturalness'.</li> <li>- Minimise trip numbers to 25 + 5 annually</li> <li>- Minimise groups sizes to 6+2</li> <li>- Avoid other recreational users when encountered (include as a prescription of the Operations Manual)</li> <li>- Use existing routes and tracks where possible, avoid new track formation.</li> </ul>
<p><b>The assessment process must consider the social and environmental benefits and impacts of the proposal</b></p>	<p>Perceived social impacts are largely subjective, and relate to the of helicopter access to Lake Malbena.</p> <p>It should be noted that the TWWHA management plan does not allow for aerial access to remote areas with relatively high use (such as the Western lakes around the Nineteen Lagoons), or aerial access to the Wilderness Zone. As a result, the only aerial access permitted on the eastern side of the Central Plateau is the southern area between Lake St Clair and the Pine River valley, in which Lake Malbena is located. Considering the low usage of the area, and by avoiding fly-overs of popular walking routes, sticking to the eastern edge of the TWWHA and by adopting fly neighbourly practices, social impacts of the proposal can be managed/mitigated.</p> <p>Potential environmental impacts have been listed above. The cumulative effect of the proposed use on the wilderness characteristics of the greater TWWHA has also been identified as a potential impact. Considering the overall small scale of the proposal, the existing history of extensive human use and infrastructure, and the location on the eastern periphery of the TWWHA should result in a minimal proportionate impact on the wilderness characteristics and values of the TWWHA.</p> <p>Potential environmental and social benefits of the proposal include:</p> <ul style="list-style-type: none"> <li>- providing for public access at levels and a type which will maintain the</li> </ul>

	<p>wilderness qualities of the area for present and future generations;</p> <ul style="list-style-type: none"> <li>- Protect and promote indigenous culture of the area, and provide access to country through partnerships with the Aboriginal communities.</li> <li>- Protect and promote the European history of the area, and the inextricable link to between Halls Island and the birth of the Walls of Jerusalem National park. The proponents have partnered with the Queen Victoria Museum and Art Gallery Launceston (QVMAG) as the vehicle through which objects relating to this history, and the narrative itself, can be shared with the wider community through a permanent collection and future exhibition.</li> <li>- Facilitate low-impact, minimally invasive educational and scientific research activities, through collaboration with PAWS, QVMAG Natural Science department, and the involvement of guests in regular 'citizen science' partnerships.</li> <li>- Having a professional operation that adheres to strict biosecurity protocols will ensure wilderness values are retained.</li> <li>- It is a well-known fact that commercial operations can provide much needed surveillance to assist the authority managing the TWWHA. Having trained staff working in remote areas enables efficient communication to an authority of any observed poor behaviour by free and independent walkers (such as use of camp fires, hunting with firearms and use of dogs.</li> <li>- The clientele who partake in this type of tourism offer are often successful business champions that have a large range of influence. Being able to provide well-constructed conservation messages to these persons can assist greatly with increased appreciation of WHA's and national parks within Australia.</li> </ul>
<p><b>The assessment process must consider appropriate monitoring and compliance measures.</b></p>	<p>The baseline condition of all walking routes and existing tracks/historical routes to be documented and recorded by independent specialist prior to commencement of operations. Proponent's preference is to use North Barker Ecosystem Services to perform this.</p> <p>The monitoring of all walking activities are to be performed by GPS tracking and recorded, for submission and review through quarterly 'Protocol meetings' with PAWS.</p> <p>On-island site monitoring to be carried out annually with PAWS staff member. The</p>

	<p>proponent will supply access to perform this monitoring action. The offer of establishing photo monitoring sites of use area is suggested by the proponent.</p> <p>All helicopter access flights are regulated, including the number of flights and landings.</p> <p>The proponent welcome all reasonable monitoring provisions requested by State or Federal agencies.</p>
<b>The assessment process must consider provision of public consultation based on the scale and nature of the proposal</b>	<p>The project is small in scale (~25 trips per year), and potential impacts. Public Consultation with key stakeholders has been performed by the proponent (see 4.4 Community Consultation). Public comment will be available through the local government Development Application process. This is a well-established practice within Tasmania and is regularly used by conservation based NGO's.</p>

**Supplemental Table 2: Project specifics in relation to 6.8 Commercial Tourism, Tasmanian Wilderness World Heritage Management Plan 2016 (page 150).**

The 2016 Plan outlines key criteria for commercial tourism in the TWWHA. The below table addresses these criteria:

<b>Describe how the experience is based on the values and features of the TWWHA;</b>	<p>The focal points of this proposal include:</p> <ol style="list-style-type: none"> <li>1) The interpretation and presentation of the European cultural history of the island, and the related Reg Hall and Walls of Jerusalem story</li> <li>2) The interpretation and presentation of the Aboriginal cultural landscape, and the s45 , in partnership with the members of the Tasmanian Aboriginal Communities</li> <li>3) Interpretation and presentation of additional OUV's found in the TWWHA, including but not limited to <ol style="list-style-type: none"> <li>a) Examples representing the major stages of the earth's evolutionary history such as endemic conifers, peatlands,</li> <li>b) Examples representing significant ongoing geological process, biological evolution and man's interaction with the natural environment. Examples include cushion plant (bolster heath) ecosystems, and the diversity of plant and animal species.</li> </ol> </li> </ol>
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	<p>c) Examples of superlative natural phenomena, formations or features. Examples include the exceptional combination of natural and cultural elements</p> <p>d) Examples of significant habitats where threatened species of plants and animals of outstanding universal scientific and conservation value still exist. Examples include sphagnum peatlands, and rainforest communities</p>
<b>Submit a case for why it should be situated within reserved land and address compatibility with existing services and infrastructure;</b>	<p>This proposal, and the interpretation and presentation of the cultural history of Halls Island which it revolves around, is only achievable if located on Halls Island.</p> <p>The principle of sustainable use of the area (as was the case of Reg Hall) can prove that well managed commercial enterprises can exist at a sustainable level with the TWWHA.</p> <p>The proposal is compatible and complimentary to the TWWHA Management Plan 2016, and guidelines for the Self-Reliant Zone.</p>
<b>Describe how it will contribute to the guiding Vision and management Objectives for the TWWHA as articulated in the management plan</b>	<p>Throughout the development and operations of Halls Island, continue on-going engagement with the scientific community, PAWS, local Aboriginal groups and the Queen Victoria Museum and Art Gallery (QVMAG). Through these partnerships the project will facilitate and provide on-the-ground research aimed at supporting the identification, protection, conservation, and presentation of the World Heritage, National Heritage and other natural and cultural values of the TWWHA.</p> <p>Examples include on-country trips with local Aboriginal groups to further develop knowledge and narrative relating to the area, the collection of invertebrate samples through a 'citizen science' style partnership between Halls Island guests and PAWS/QVMAG, and the opportunity for leaders in science and culture to join Halls Island trips as a value-add to customers while providing an immediate return to the wider Tasmanian community.</p> <p>Operations will facilitate community engagement, add to the diversity and quality of experiences in the TWWHA consistent with the conservation of natural and cultural values, and further identify, protect, conserve and restore cultural values in the TWWHA. This level of community involvement will</p>

	<p>create a new level of community awareness of the values of the TWWHA. This will ultimately provide an increased custodianship of this remote part of the TWWHA.</p> <p>The proposal is also compatible with the objective and aims of the Parks 21 subsidiary document. This Government /Tourism Industry agreement has the foundation principle of “Good Tourism creates Good Conservation”</p>
<b>Describe how potential impacts on the legitimate enjoyment and experience by others of TWWHA features and values will be managed</b>	<p>Access to Halls Island has always been by a small number (less than ~12 per annum) of the public wishing to visit and use the privately owned Hall’s Hut. This small number of regular users, as identified by the hut log book and by conversations with the neighbouring property owners, will have access facilitated upon reasonable request. Further access arrangements are being considered through the Launceston Bushwalking Club, of which Reg Hall was the patron.</p> <p>Visits to Halls Island by scientists, artists, cultural researchers, members of the Aboriginal community and others will be facilitated by the proponents, as part of general operations.</p> <p>Other members of the Tasmanian community interested in access to the cultural history of Halls Island will find a significant collection relating to the hut and history at the Queen Victoria Museum and Art Gallery, Tasmania, which has been kindly donated by the proponents.</p> <p>Aerial access is described in the TWWHA Management Plan as ‘<i>a significant component of presentation in the TWWHA...providing opportunities to contribute to the diversity of experiences that are offered</i>’. It should be noted that the TWWHA management plan does not allow for aerial access to remote areas with relatively high use (such as the Western lakes around the Nineteen Lagoons), or aerial access to the Wilderness Zone. As a result, the only aerial access permitted on the eastern side of the Central Plateau is the southern area between Lake St Clair and the Pine River valley, within which Lake Malbena is located. Considering the low usage of the area, and by avoiding fly-overs of popular walking routes, sticking to the eastern edge of the TWWHA and by adopting Fly Neighbourly practices, social impacts of the proposal can be managed/mitigated.</p>



	<p>The cumulative effect of the proposed use on the wilderness characteristics of the greater TWWHA has also been identified as a potential impact. Considering the overall small scale of the proposal, the existing history of extensive human use and infrastructure in and around Halls Island, and the location on the eastern periphery of the TWWHA should result in a minimal proportionate impact on the wilderness characteristics and values of the TWWHA.</p> <p>In relation to 'wilderness character', Halls Island has featured settlement for in excess of 60 years. Apparent Naturalness has been altered by the built heritage (hut building), and various historical cairned and formed walking routes braiding through the area from Lake Malbena, all the way east to Lake Olive. The wilderness value of 'time remoteness' is a subjective measurement – historically, by horse, sea-plane or 4wd, Halls Island and surrounds have been comparatively easily accessed for close to a century. It has only been since the late 1980's that access has been restricted to foot-access only from Lake Olive, and access has been a ~6 hour hike. Based on these observations, 'impacts on wilderness characteristics' of the greater area will be minimal.</p> <p>Impacts on other general users of the TWWHA will be managed through the Operations Manual, and include avoiding other users when encountered.</p>
<p><b>Describe how it will be constructed and/or operate in a manner compatible with the protection and conservation of World Heritage and other values</b></p>	<p>Potential impact on 'wilderness character': Considering the overall small scale of the proposal, the existing history of extensive human use and infrastructure in and around Halls Island, and the location on the eastern periphery of the TWWHA should result in a minimal proportionate impact on the wilderness characteristics and values of the TWWHA.</p> <p>In relation to 'wilderness character', Halls Island has featured settlement for in excess of 60 years. Apparent Naturalness has been altered by the built heritage (hut building), and various historical cairned and formed walking routes braiding through the area from Lake Malbena, all the way east to Lake Olive. The wilderness value of 'time remoteness' is a subjective measurement – historically, by horse, sea-plane or 4wd, Halls Island and surrounds have been comparatively easily accessed for close to a century. It has only been since the late 1980's that access has been restricted to foot-access only from Lake Olive, and access has been a ~6 hour hike. Based on these</p>

observations, 'impacts on wilderness characteristics' of the greater area will be minimal.

Potential impacts on natural values (flora and fauna) have been covered in Table 1 above, and revolve around potential impacts from (i) wildfire, (ii) trampling and erosion, (iii) culturally inappropriate use and (iv) the introduction of introduced flora, fauna or pathogens. Each of these potential impacts are easily mitigated through listed mitigation measures, and monitoring through GPS tracking and quarterly meetings with PAWS provide a robust system for review.

A Raptor assessment of the flight path and Halls Island will be carried out by the proponent (assisted by experts) to ensure that potential impacts on raptors are avoided.

The proponents already operate a Standing Camp in the TWWHA, and can demonstrate that the listed impact mitigation measures, walking group ratios, and camp construction / operation measures are sustainable, and compatible and beneficial to the protection and conservation of the World Heritage and other values. In particular, the proposal will lead to:

- Increased awareness of Biosecurity importance and practices that guests will retain for life.
- An increased awareness of the TWWHA, and the outstanding universal values and cultural history of the area
- High quality interpretation and presentation of the TWWHA
- Increased access to the TWWHA for researchers, artists and members of the Aboriginal community
- All access, egress, and operations revolve around minimising interaction and impacts on other users.
- Activities are compatible with the TWWHA Management Plan 2016

The presentation of built heritage, such as the historic Halls Hut, is inextricably linked with its on-going conservation.

Construction and operational guidelines have been described in sections 1 and 4.

**Incorporate environmentally sustainable operational practices and the use of environmentally 'best practice' goods and technologies**

Best practice for this proposal include:

- Complete capture grey-water and sewage
- Buildings are minimalist in scale, and require minimal fixtures to ground
- Infrastructure outside of the 30m x 10m Standing Camp site is minimal
- The number of trips, and customers per trip are minimal in scale (approx. 25 trips per year), and sympathetic to the location in the TWWHA
- The site selection is a location with previous European human activity and built heritage, and obvious long-term disturbance.
- Biosecurity practices will be adopted ongoing.

**Detail any external costs resulting from the proposal including ongoing monitoring and compliance**

s45

**Demonstrate economic viability**

s45

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

**From:** [RiverFly 1864](#)  
**To:** [EPBC Referrals](#)  
**Subject:** RE: EPBC Act Referral Submission Confirmation - Halls Island, Tas (EPBC 2018/8177) [SEC=UNCLASSIFIED]  
**Date:** Wednesday, 28 March 2018 11:44:14 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Hello s22

Thank you for your advice, which I have acted on. Please find the Halls Island referral re-submitted on your system thank you.

In relation to my request for the following documents to remain commercial-in-confidence:

- (1) PWS RAA: Our proposal to develop a standing camp within the self-reliant zone of the TWWHA, and service it by helicopter, is the first of its kind for the TWWHA. It is also the first approved application of this type under the 2016 TWWHA Management Plan. As a result of this precedent-setting, we have invested heavily in unique intellectual property, time and money in the research and presentation of these documents. The RAA documents contain many instances of business and operation-specific information that is not in the public domain, not easily discoverable, and should it be released publicly, would cause competitive detriment to the proponent. Pages 6, 11, 22-26, 32-34, 36-37, 38, 39 and Attachment 10 contain particularly sensitive information related to the above justifications.
- (2) Supplemental Tables 1 and 2. See above. Halls Island is the first proposal to successfully address the TWWHA Management Plan 2016 criteria relating to Tables 1 & 2. If the information contained was made publicly available, the result would be competitive detriment to the proponent.
- (3) s47F helicopter advice attachment: This document was prepared at the proponents cost, with key intellectual property and input from the proponent and the consultant. As the proposal is the first of its type to propose helicopter use in the TWWHA, and achieve approval through the RAA process, the release of this customised information, research and intellectual property would cause competitive detriment to the proponent. The information contained in this document is not easily discoverable, and not in the public domain.
- (4) The PWS RAA, along with Supplemental Tables 1 and 2 contain sensitive information relating to the s45, a site location which is not known in the public domain, and information of which is not readily discoverable.

To the best of our knowledge, none of the documents above are required to be disclosed by law.

It is important to highlight that we are more than happy to discuss our project with members of the public, and fully outline our proposed activities in an open and transparent manner. Table 1 of the online portal contains very detailed and specific information relating to the proposed activities, as does the rest of the EPBC portal document. The publicly available documents supplied including the Flora and Fauna assessment, the proposed flight path, and the proposed site plans all contain detailed information to enable public readers to develop a sound understanding of what is being proposed, without causing competitive detriment to ourselves.

Thank you.

Kindest Regards,

s47F

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Tasmania, Australia

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**2016 Qantas Australian Tourism Award Winner**

**2016 & 2017 Tasmanian Tourism Award Winner**

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**From:** EPBC Referrals [mailto:EPBC.Referrals@environment.gov.au]

**Sent:** Monday, 26 March 2018 4:40 PM

**To:** s47F

**Cc:** EPBC Referrals

**Subject:** RE: EPBC Act Referral Submission Confirmation - Halls Island, Tas (EPBC 2018/8177)  
[SEC=UNCLASSIFIED]

Hi s47F

Thank you for submitting an EPBC referral for the proposed Halls Island Standing Camp in Lake Malbena, Tasmania. I have reviewed your application and further clarification/amendments are required for the referral to be accepted for assessment. I've attached a copy of the current submission to this email to assist you in identifying and revising your application where it is relevant and appropriate to do so. Could you please review and update the following aspects of your application via online services:

-

**Section 1 – Summary of your proposed action**

Response to question 1.15 – you have indicated that the Standing Camp proposal is part of a larger project, however it is unclear whether the referral is to assess stage 1, stage 2 or both stages of the project. Therefore, could you please clarify the scope of this referral (i.e. is it for stage 1, stage 2 or both stages?).

**Project coordinates and location of the proposed action**

Unfortunately the coordinates for the helipad and helicopter flight path fall short of Halls Island. To assist the Department could you please update the coordinates provided online, and provide additional maps or figures that clearly show the development area and footprint of the proposed activities (including walking trails, huts and indicative helicopter route) to confirm the location of the helipad and other infrastructure etc.

**Section 2 – Matters of National Environmental Significance**

The Department notes that potential impacts to World heritage has not been identified in the application under section 2.1, even though the proposal occurs within a world heritage property. Please change your response to 'yes' and include your summary of impact to Impact table 2.1.1.

Section 2.4 identifies listed threatened species that may be affected by the proposal. Some of these species are not listed under the EPBC Act and therefore not necessary for inclusion. Could you please remove from your analysis:

- White bellied sea eagle (*Haliaeetus leucogaster*) – this species is only relevant for proposals within a marine environment.
- Exotic flora and fauna – not listed under the EPBC Act. You may however, move this information to Section 4 of the application as it contains management measures to avoid impacts to other environmental values.
- The Japanese Snipe and Satin flycatcher are also listed migratory species. As such, you should also consider including this information under Section 2.5 which describes potential impacts to listed migratory species.

### Section 3 – Description of the project area

The Department considers that the area is likely to have national heritage and world heritage values, given its location within the Tasmanian Wilderness World Heritage Area. Please update section 3.8 to address this.

### Guidance on the publishing of referral information

Please note that if you consider the referral contains information that is commercial-in-confidence, you must clearly identify such information and the reason for its confidentiality. To be considered commercial-in-confidence, it must be demonstrated to the Minister (and Department) that:

- The release of the information would cause competitive detriment to the person; and
- The information is not in the public domain; and
- The information is not required to be disclosed under another law of the Commonwealth, a State or a Territory; and
- The information is not readily discoverable.

Your justification is important factor as the current application refers to attachments you have requested not to publish. In the absence of detailed responses, you may wish to consider including redacted attachments to support your application without compromising commercial-in-confidence information such as indigenous cultural heritage.

Please do not hesitate to contact me on the number below if you have any questions. Once resubmitted, the Department will continue to review your application for publication and assessment.

Kind regards,

s22

Referrals Gateway

Department of the Environment and Energy

P: 02 6274 s22 | E: [EPBC.Referrals@environment.gov.au](mailto:EPBC.Referrals@environment.gov.au)

---

**From:** Department of the Environment and Energy [<mailto:noreply@environment.gov.au>]

**Sent:** Thursday, 22 March 2018 1:05 PM

**To:** s47F <[info@riverfly.com.au](mailto:info@riverfly.com.au)>

**Cc:** s47F <[info@riverfly.com.au](mailto:info@riverfly.com.au)>; s47F <[info@riverfly.com.au](mailto:info@riverfly.com.au)>

**Subject:** EPBC Act Referral Submission Confirmation



## EPBC Act referral submission confirmation

Hello **s47F**

Thank you for submitting your EPBC Act referral for the project **Halls Island, Tasmania**. Your EPBC no is:

**2018/8177.**

Please note that your EPBC Act referral will not be processed until all parties listed in the referral have signed the declaration form provided in the PDF EPBC Act referral attached to this e-mail.

Please send a signed copy of your EPBC Act referral signature page to [EPBC.referrals@environment.gov.au](mailto:EPBC.referrals@environment.gov.au).

Please note that your EPBC Act referral will not be processed until the EPBC referral fee has been paid. You will receive a separate email with your EPBC Act referral fee tax invoice unless you have requested a waiver or exemption.

To view your EPBC Act referral, please click the 'My applications' button below. Alternatively you can right-click, **copy link address**, and paste the link into your browser.

[My applications](#)

Regards,  
**Online Services**



**Australian Government**

**Department of the Environment and Energy**

If you require any further assistance with Online Services, please visit our







Electronic Briefing Package for Stop clock  
Halls Island Standing Camp, Lake Malbena, Tasmania

Attachment	Name	Document Description	Record Number	Modified
	<a href="#">2018-8177 Referral-StopClock-Brief.docx</a>	FOR SIGNATURE	001908829	23/04/2018 15:10
Att. A	<a href="#">2018-8177 Referral-StopClock-Letter.docx</a>	FOR SIGNATURE	000883725	23/04/2018 14:44
Att. B	<a href="#">2018-8177 referral.pdf</a>	Referral		28/03/2018 15:06
Att. B	<a href="#">2018-8177 Referral-Attach-20170621_dh appendix flora and fauna assessment 002.pdf</a>	Referral		22/03/2018 13:07
Att. B	<a href="#">2018-8177 Referral-Attach-do not publish commercial in confidence raa - halls island.pdf</a>	Referral		22/03/2018 13:07
Att. B	<a href="#">2018-8177 Referral-Attach-do not publish supplemental tables 1 and 2.pdf</a>	Referral		22/03/2018 13:07
Att. B	<a href="#">2018-8177 Referral-Attach-do not publish a ssession heli route for eagle nests njm.pdf</a>	Referral		22/03/2018 13:07
Att. B	<a href="#">2018-8177 Referral-Attach-halls island maps.pdf</a>	Referral		28/03/2018 11:21
Att. B	<a href="#">2018-8177-Referral-ERT-Exclusion area site 3-5km.pdf</a>	Referral		28/03/2018 14:31
Att. B	<a href="#">2018-8177-Referral-ERT-Flight path-5km.pdf</a>	Referral		28/03/2018 14:25
Att. B	<a href="#">2018-8177-Referral-ERT-Helipad-5km.pdf</a>	Referral		28/03/2018 14:27
Att. B	<a href="#">2018-8177-Referral-ERT-Standing camp-5km.pdf</a>	Referral		28/03/2018 14:26
Att. C	<a href="#">TWWHA Management Plan 2016.pdf</a>	TWWHA management plan		23/04/2018 13:38
Att. D	<a href="#">2018-8177 Referral Comment - Heritage 13 April 2018.msg</a>	Line advice Heritage		23/04/2018 15:28

## Department of Primary Industries, Parks, Water &amp; Environment

ABORIGINAL HERITAGE TASMANIA

Hobart GPO Box 44, Hobart, Tasmania, 7001

Ph 1300 487 045

Web [www.aboriginalheritage.tas.gov.au](http://www.aboriginalheritage.tas.gov.au)

Inquiries: s22 (Director – AHT)  
Phone: 6165s22  
Email: s22@heritage.tas.gov.au  
Our ref: DA265/AHDR1010/RAA3220

s47F  
RiverFly 1864  
P.O. Box 1061  
LAUNCESTON TAS 7250

Dear s47F

**REQUEST FOR ADVICE FROM ABORIGINAL HERITAGE TASMANIA – PROPOSED PROJECT AT HALLS ISLAND, LAKE MALBENA.**

Thank you for contacting Aboriginal Heritage Tasmania (AHT) in relation to the proposed project at Halls Island, Lake Malbena. AHT has previously provided two reviews and assessments on the project that included its potential impact to Aboriginal cultural heritage sites and cultural values. These included Desktop Assessment 265 (DA265 - 15 June 2015) provided as part of an Expression of Interest (EOI) process and a formal response to the Parks and Wildlife Service Reserve Activity Assessment processes (RAA 3220) which included a letter and Aboriginal Heritage Desktop Review 1010 (AHDR1010 – 23 October 2017).

The previous reviews and assessments concluded that there are no Aboriginal heritage sites recorded within or close to the proposed development and that, based on a review of previous reports and analysis of the landscape features, there is a low probability of Aboriginal heritage sites being present. Accordingly, there is no requirement for an Aboriginal heritage investigation to be undertaken. Please be aware that all Aboriginal heritage is protected under the *Aboriginal Heritage Act 1975*. If at any time during works the proponent suspects Aboriginal heritage, they should cease works immediately and contact AHT for advice. Attached is an Unanticipated Discovery Plan, which the proponent should have on hand during ground disturbing works, to aid in meeting requirements under the Act.

Importantly, the previous reviews and assessments noted that the proposed project is located within an area that contains significant Aboriginal heritage sites, landscapes and cultural values and provided advice accordingly. The AHT response to RAA 3220 noted that proposed activities listed included potential visits to a number of significant Aboriginal cultural heritage sites within close proximity to the project area including the Mary Tarn Aboriginal cultural heritage site. Importantly, all Aboriginal cultural heritage sites are considered significant to Aboriginal people and there are cultural sensitivities associated with the conduction of activities at these sites. AHT would therefore advise that the proponent formally contact, engage and consult with the Aboriginal Heritage Council (AHC) and the Aboriginal community to outline the details of the proposed development and any proposed plans for activities including site visits. Engagement and consultation with the AHC, which includes members from the Tasmanian Aboriginal community with extensive knowledge and experience in the management, preservation and protection of Aboriginal cultural heritage, and the Aboriginal community, may provide further information and advice in relation to sensitivity of the sites and what culturally appropriate activities can be undertaken as part of the project.

AHT noted that as part of RAA3220 the proponent identified a number of potential opportunities for the direct involvement of and collaboration with the Aboriginal community on the project. These opportunities include the Aboriginal input, permission and facilitation on cultural heritage interpretation and increased access to country for local Aboriginal communities. Importantly, the TWWHA Management Plan 2016 outlines the commitment that 'interpretation and presentation of the TWWHA's Aboriginal cultural values are determined by Aboriginal people' along with a commitment to implement regular access visits to the TWWHA for Aboriginal people. AHT would therefore advise engagement and consultation with the AHC and Aboriginal community on the development of all cultural heritage interpretation and planned access to Country projects.

Another key objective of the TWWHA Management Plan 2016 involves the development of strategies for secure employment opportunities for Aboriginal people in the TWWHA. While not considered within RAA 3220, the AHC may want to see consideration and commitments by the proponent for the establishment of collaborative relationships and partnerships with the Aboriginal community in terms of employment for Aboriginal people as part of this project. The Aboriginal community do not generally support non-Aboriginal people interpreting and presenting their heritage.

Finally and as noted in RAA3220, AHT can arrange for the proponent to present the project to the AHC. Please let AHT know if there are any further questions or queries relating to this advice.

Yours sincerely,

A large grey rectangular box redacting the signature of the Director of Aboriginal Heritage Tasmania.

s22

Director – Aboriginal Heritage Tasmania

31 May 2018

Enclosures:

1. Unanticipated Discovery Plan (UDP).

## Line Area Advice – Heritage Branch

### HALL'S ISLAND STANDING CAMP, LAKE MALBENA (EPBC 2018/8177)

#### Action

The proponent, Mr s47F of Wild Drake Pty Ltd, is proposing to develop a commercial tourism operation at Hall's Island, Lake Malbena in the Walls of Jerusalem National Park.

The site falls within the Walls of Jerusalem National Park, in the 'Self Reliant Recreation' zone of the Tasmanian Wilderness World Heritage Area (Management Plan, Map 22, p204).

The Island is subject to a lease (which the proponent holds) and a hut for private recreation use has been in place since the 1950s.

The project involves:

- A helicopter flight-path from Derwent Bridge designed to meet customised Fly Neighbourly prescriptions and avoid nesting wedge tailed eagles (11 minutes each direction from Derwent Bridge).
- A helicopter landing site on the mainland, adjacent to Hall's Island (with potential associated board walks and foot pads)
- Construction of a standing camp (approx. 800m<sup>2</sup> site), comprised of:
  - Three pre-fabricated twin-share accommodation buildings, of approximately 4m x 3m
  - One pre-fabricated central kitchen / communal hut, of approximately 8m x 4m
  - Associated toilet building(s) with complete-capture pod systems for removal of all sewage and grey-water
  - Minimal internal 12v lighting
  - Gas or electric heating
- Board walks on the island where required to minimise impacts (including between huts)
- Non-motorised transport on Lake Malbena
- Approximately 3 hours of further helicopter usage, annually, for maintenance and servicing of the standing camp. Helicopter serving relating to construction, maintenance and re-supply of the standing camp will occur within the standing camp footprint, utilising an area of sheet rock for depositing and collection of goods via slinging.
- A maximum of 30 commercial trips per season, with a maximum of six customers and two guides per trip. Each trip will be for 3 nights and 4 days. Proposed activities include kayaking on Lake Malbena, a half day walk up Mount Oana (on the mainland adjacent to Lake Malbena), unguided walking within *Eucalyptus subcrenulata* forest and woodland, occasional fly fishing specific activities around Lake Malbena capped at six per annum)

<<ESD Tick all that apply>>

World Heritage property ☒

National Heritage place ☒

Commonwealth marine area ☐

Commonwealth land ☐

Commonwealth Action ☐

Other whole of env matter ☐

### World Heritage property

## Listed values

The Australian Government is working with the Tasmanian Government and technical advisory bodies to the World Heritage Committee to develop the Retrospective Statement of Outstanding Universal Value for the Tasmanian Wilderness. The Tasmanian Wilderness is inscribed on the World Heritage List under four natural (vii, viii, ix and x) and three World Heritage Area cultural (iii, v, vi) criteria.

Examples of World Heritage values that contribute to the property's Outstanding Universal Value are identified below (this information is available on the Department of Environment and Energy website at: <http://www.environment.gov.au/heritage/places/world/tasmanian-wilderness/values>)

### **Criterion (iii) Bear a unique or at least exceptional testimony to a cultural tradition or to a civilisation which is living or which has disappeared.**

The Tasmanian Wilderness bears a unique and exceptional testimony to an ancient, ice age society, represented by:

- Pleistocene archaeological sites that are unique, of great antiquity and exceptional in nature, demonstrating the sequence of human occupation at high southern latitudes during the last ice age.

### **Criterion (iv) An outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history.**

The Tasmanian Wilderness provides outstanding examples of a significant, traditional human settlement that has become vulnerable under the impact of irreversible socio-cultural or economic change. The world heritage values include:

- archaeological sites which provide important examples of the hunting and gathering way of life, showing how people practised this way of life over long time periods, during often extreme climatic conditions and in contexts where it came under the impact of irreversible socio-cultural and economic change.

### **Criterion (vi) Directly or tangibly associated with events or living traditions, with ideas or with beliefs, with artistic and literary works of outstanding universal significance.**

The Tasmanian Wilderness is directly associated with events of outstanding universal significance linked to the adaptation and survival of human societies to glacial climatic cycles. The world heritage values include:

- archaeological sites including Pleistocene sites, which demonstrate the adaptation and survival of human societies to glacial climatic cycles and periods of long isolation from other communities (e.g. the human societies in this region were the most southerly known peoples on earth during the last ice age).

### **Criterion (vii) - Contains superlative natural phenomena, or areas of exceptional natural beauty and aesthetic importance.**

The landscape of the Tasmanian Wilderness has exceptional natural beauty and aesthetic importance and contains superlative natural phenomena including:

- view fields and sites of exceptional natural beauty associated with:

- flowering heaths of the coastline;
- the south and south-west coasts comprising steep headlands interspersed with sweeping beaches, rocky coves and secluded inlets;
- eucalypt tall open forests including *Eucalyptus regnans*, the tallest flowering plant species in the world;
- rainforests framing undisturbed rivers;
- buttongrass, heath and moorland extending over vast plains;
- wind-pruned alpine vegetation;
- sheer quartzite or dolerite capped mountains (including Cradle Mountain, Frenchmans Cap, Federation Peak and Precipitous Bluff);
- deep, glacial lakes, tarns, cirques and pools throughout the ranges;
- the relatively undisturbed nature of the property;
- the scale of the undisturbed landscapes;
- the juxtaposition of different landscapes;
- the presence of unusual natural formations (e.g. particular types of karst features) and superlative examples of glacial landforms and other types of geomorphic features; and
- rare or unusual flora and fauna.

**Criterion (viii) Outstanding examples representing major stages of earth's history, including the record of life, significant ongoing geological processes in the development of landforms, or significant geomorphic or physiographic features.**

The Tasmanian Wilderness has outstanding examples representing significant ongoing geological processes and ongoing ecological and biological processes in the evolution and development of terrestrial, fresh water and coastal ecosystems and communities, including:

- sites where processes of geomorphological and hydrological evolution are continuing in an uninterrupted natural condition (including karst formation, periglaciation which is continuing on some higher summits (e.g. on the Boomerang, Mount La Perouse, Mount Rufus, Frenchmans Cap), fluvial deposition, evolution of spectacular gorges, marine and aeolian deposition and erosion, and development of peat soils and blanket bogs);
- ecosystems which are relatively free of introduced plant and animal species;
- coastal plant communities free of exotic sand binding grasses which show natural processes of dune formation and erosion;
- undisturbed catchments, lakes and streams;
- alpine ecosystems with high levels of endemism;
- the unusual 'cushion plants' (bolster heaths) of the alpine ecosystems;
- ecological transitions from moorland to rainforest;
- pristine tall eucalypt forests;
- examples of active speciation in the genus *Eucalyptus*, including sites of:
  - hybridisation and introgression;
  - clinal variation (e.g. *E. subcrenulata*);
  - habitat selection (e.g. *E. gunnii*); and
  - transition zones which include genetic exchanges between *Eucalyptus* species;
- plant groups in which speciation is active (e.g. *Gonocarpus*, *Ranunculus* and *Plantago*);
- conifers of extreme longevity (including Huon pine, Pencil pine and King Billy pine);
- endemic members of large Australian plant families (e.g. heaths such as *Richea pandanifolia*, *Richea scoparia*, *Dracophyllum minimum* and *prionotes cerinthoides*);
- endemic members of invertebrate groups;
- invertebrate species in isolated environments, especially mountain peaks, offshore islands and caves with high levels of genetic and phenotypic variation;
- invertebrates of unusually large size (e.g. the giant pandini moth - *Proditrix* sp, several species of Neanuridae, the brightly coloured stonefly - *Eusthenia spectabilis*);



- invertebrate groups which show extraordinary diversity (e.g. land flatworms, large amphipods, peripatus, stag beetles, stoneflies);
- skinks in the genus *Leiopisma* which demonstrate adaptive radiation in alpine heaths and boulder fields on mountain ranges;
- examples of evolution in mainland mammals (e.g. sub-species of Bennett's wallaby - *Macropus rufogriseus*, swamp antechinus - *Antechinus minimus*, southern brown bandicoot - *Isodon obesulus*, common wombat - *Vombatus ursinus*, common ringtail possum - *Pseudocheirus peregrinus*, common brushtail possum - *Trichosurus vulpecula*, eastern pygmy possum - *Cercartetus nanus*, the swamp rat - *Rattus lutreolus*); in many birds (e.g. the azure kingfisher - *Alcedo azurea*) and in island faunas;
- animal and bird species whose habitat elsewhere is under threat (e.g. the spotted-tail quoll *Dasyurus maculatus*, swamp antechinus *Antechinus minimus*, broad-toothed rat - *Mastacomys fuscus* and the ground parrot - *Pezoporus wallicus*); and
- the diversity of plant and animal species.

**Criterion (ix) - Outstanding examples representing significant ongoing ecological and biological processes in the evolution and development of terrestrial, freshwater, coastal and marine ecosystems and communities of plants and animals.**

The Tasmanian Wilderness is an outstanding example representing major stages of the earth's evolutionary history. The world heritage values include:

- relict biota which show links to ancient Gondwanan biota including:
  - endemic conifers (including the King Billy pine *Athrotaxis selaginoides*, the Huon pine *Lagarostrobos franklinii* and the genera *Diselma*, *Microcachrys*, *Microstrobos*);
  - plant species in the families Cunoniaceae, Escalloniaceae and Winteraceae;
  - the plant genera *Bellendena*, *Agastachys* and *Cenarrhenes* in the Proteaceae;
- other plant genera with Gondwanan links (e.g. *Eucryphia*, *Orites*, *Lomatia* and *Nothofagus*);
- monotremes (e.g. platypus *Ornithorhynchus anatinus*, short beaked echidna *Tachyglossus aculeatus*);
- dasyurid species;
- parrots (e.g. orange-bellied parrot and the ground parrot);
- indigenous families of frogs with Gondwanan origins (e.g. Tasmanian froglet *Ranidella tasmaniensis*, brown froglet *Ranidella signifera*, Tasmanian tree frog *Litoria burrowsi*, brown tree frog *Litoria ewingi*);
- invertebrate species in the genera *Euperipatoides* and *Ooperipatellus*;
- the Tasmanian cave spider (*Hickmania troglodytes*);
- aquatic insect groups with close affinities to groups found in South America, New Zealand and Southern Africa (e.g. dragonflies, chironomid midges, stoneflies, mayflies and caddisflies);
- crustaceans (e.g. Anaspidacea, Parastacidae, Phreatoicidae);
- primitive taxa showing links to fauna more ancient than Gondwana (e.g. *Anaspids*, *Trogloneta* (a mysmenid spider), species of alpine moths in the subfamily Archiearinae, species in the genus *Sabatinca* of the primitive lepidopteran sub-order Zeugloptera).

**Criterion (x) - Contain the most important and significant natural habitats for in-situ conservation of biological diversity, including those containing threatened species of outstanding universal value from the point of view of science or conservation.**

The ecosystems of the Tasmanian Wilderness contain important and significant natural habitats where threatened species of animals and plants of outstanding universal value from the point of view of science and conservation still survive, including:

- habitats important for endemic plant and animal taxa and taxa of conservation significance, including:
  - rainforest communities;
  - alpine communities;
  - moorlands (e.g. in the far south-west);
  - riparian and lacustrine communities (including meromictic lakes).

- habitats which are relatively undisturbed and of sufficient size to enable survival of taxa of conservation significance including endemic taxa;
- plant species of conservation significance
- animal species of conservation significance, such as:
  - spotted-tail quoll *Dasyurus maculatus*;
  - swamp antechinus *Antechinus minimus*
  - broad-toothed rat *Mastacomys fuscus*
  - ground parrot *Pezoporus wallicus*
  - orange-bellied parrot *Neophema chrysogaster*
  - Lake Pedder galaxias *Galaxias pedderensis*
  - Pedra Branca skink *Niveoscincus palfremani*.

To be deemed of Outstanding Universal Value, a property listed for natural values must meet the condition of integrity and must have an adequate protection and management system to ensure its safeguarding (refer Operational Guidelines for the Implementation of the World Heritage Convention, para 78 and 87). The Operational Guidelines (para 88) define 'integrity' as follows:

Integrity is a measure of the wholeness and intactness of the natural and/or cultural heritage and its attributes. Examining the conditions of integrity therefore requires assessing the extent to which the property:

- a) Includes all elements necessary to express its Outstanding Universal Value;
- b) Is of adequate size to ensure the complete representation of the features and processes which convey the property's significance;
- c) Suffers from adverse effects of development and/or neglect.

The Tasmanian Wilderness was inscribed on the Australian Government's National Heritage List in 2007 under Criteria a, b, c, d, e and g for values similar to those identified for World Heritage listing. Potential impacts are therefore discussed in terms of the property's World Heritage values rather than its National Heritage values.

**Stage:**

Referral

**Previous Decisions/Advice**

<<ESD to include a copy of the ERT report that lists previous decisions in proximity to the proposed Action. If it is possible to include further information (either to the place or the values in question) please include here. >>

## Nature and extent of impacts on heritage matters as a result of the proposed Action

The proposed Action is within the Walls of Jerusalem National Park, in the Tasmanian Wilderness World Heritage Area. The site falls within the Tasmanian Wilderness World Heritage Area Self-Reliant Recreation Zone. Activities permitted within this zone are described in the 2016 Management Plan.

### Assessment of the potential impacts of the development against the TWWHA World Heritage criterion

#### CULTURAL CRITERION

**Criterion (iii) Bear a unique or at least exceptional testimony to a cultural tradition or to a civilisation which is living or which has disappeared.**

**Criterion (iv) An outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history.**

**Criterion (vi) Directly or tangibly associated with events or living traditions, with ideas or with beliefs, with artistic and literary works of outstanding universal significance.**

#### Values

The listed Values relevant to Criterion (iii), (iv) and (vi) that the proposed tourism development could impact are archaeological sites, including:

- Pleistocene sites that are unique and of great antiquity
- sites showing how people practised their way of life over long time periods
- sites that demonstrate the adaptation and survival of human societies to glacial climatic cycles and periods of long isolation from other communities.

#### Threats and proposed mitigation

The proponent has provided formal advice from Aboriginal Heritage Tasmania stating that *within or close to* the proposed development there is a low probability of Aboriginal heritage sites being present.

Tasmanian Aboriginal heritage is protected under the *Aboriginal Heritage Act 1975* (Tasmania). Aboriginal Heritage Tasmania (AHT) have advised the proponent that if at any time during works the proponent suspects Aboriginal heritage is present, works should immediately cease and advice be sought from AHT.

AHT further advise the proponent that within the area more broadly there are significant Aboriginal heritage sites, landscapes and cultural values. Their advice encourages the proponent to formally contact, engage and consult with the Aboriginal Heritage Council (Tasmania) and the Aboriginal community on the proposed development and any proposed plans for activities, including site visits. This would allow the proponent to understand the sensitivity of sites and the culturally appropriate activities that could be undertaken as part of the project. Heritage Branch notes that this area on the western frontier of the Van Diemen's Land colony may also hold evidence relating to use of the landscape and contact history during the first half of the 19<sup>th</sup> Century in Tasmania.

An *Unanticipated Discovery Plan* has been provided to the proponent to enable them to meet requirements under the *Aboriginal Heritage Act 1975* during the project's construction and operation. Adherence to the Unanticipated Discovery Plan at sites used for the tourism operation will be crucial to the protection of the cultural values that contribute to the property's Outstanding Universal Value under World Heritage Criterion (iii), (iv) and (vi).

If these proposed measures are implemented and adhered to, impact on cultural heritage values as a result of the proposed development should be effectively mitigated.

## **NATURAL CRITERION**

**Criterion (vii) - Contains superlative natural phenomena, or areas of exceptional natural beauty and aesthetic importance.**

### **Values**

The listed Values relevant to Criterion (vii) that the proposed tourism development could impact are view fields and sites of exceptional natural beauty associated with:

- the relatively undisturbed nature of the property;
- the scale of the undisturbed landscapes;

### **Threats and proposed mitigation**

The noise and visual impacts of helicopter access and the development of standing camp structures on Halls Island are of concerns in regard to Criterion (vii).

The proponent proposes to mitigate the potential noise and visual impact of helicopter usage on other users of the TWWHA through:

- flying at 1000m+ altitude where possible
- using the Tasmanian Parks and Wildlife Service prescribed flight path which avoids walking routes and Wilderness Zones
- following the eastern periphery of the TWWHA
- ensuring that the pilot and passengers note other users and implement avoidance measures.

The proponent's planned use of an area adjacent to Hall's Island as a helicopter landing site is compliant with the prescriptions of the 2016 TWWHA Management Plan (P.134/135) –

- *within the Self Reliant Tourism Zone landing sites are limited to a maximum of 5.*
- *Resupply and maintenance of commercial huts and standing camps by helicopter, including the use of long lines, is permitted.*
- *Helicopter use for resupply must be minimised and any landings must be at the nearest practical location to the hut or standing camp.*

The proposed standing camp complies with the Tasmanian Parks and Wildlife Service Standing Camp Policy (2006). As a 'Type C' Standing Camp under this policy it will remain intact and set up for the entire year. The proponent's Lease and Licence conditions require that the standing camp design must minimise environmental impacts through factors such as

- *appropriate footprint, design and techniques for the three accommodation huts and the communal kitchen hut*
- *use of low-visibility materials in external surfaces (i.e. timber and steel materials in muted bush tones)*
- *the retention of existing vegetation and topography.*

If the proposed measures are implemented and adhered to, the impact of the proposed development on the view fields and sites of exceptional natural beauty associated with this area of the TWWHA should be effectively mitigated.

## NATURAL CRITERION (continued)

Criterion (viii) Outstanding examples representing major stages of earth's history, including the record of life, significant ongoing geological processes in the development of landforms, or significant geomorphic or physiographic features.

Criterion (ix) - Outstanding examples representing significant ongoing ecological and biological processes in the evolution and development of terrestrial, freshwater, coastal and marine ecosystems and communities of plants and animals.

and

Criterion (x) - Contain the most important and significant natural habitats for in-situ conservation of biological diversity, including those containing threatened species of outstanding universal value from the point of view of science or conservation.

### Values

Values relevant to Criterion (viii), (ix) and (x) that occur within the proposed tourism development area are

The development of peat soils and blanket bogs

The Northbarker reports indicate that both the Hall's Island standing camp area and the proposed mainland helicopter landing site have areas of *Sphagnum* peatland in close proximity. All the bogs on Hall's Island have been mapped as *Sphagnum* peatland because of the percentage cover of *Sphagnum* species, with most patches having well over the required 30% cover (up to 80% ground cover in some cases) and over 50 cm depth of *Sphagnum* being evident in places

Endemic members of large Australian plant families

The Northbarker Flora and Fauna Assessment of Hall's Island lists Tasmanian endemic species belonging to the large Australian plant families Epacridaceae, Myrtaceae, Proteaceae.

Conifers of extreme longevity

The Northbarker Flora and Fauna Assessment of Hall's Island lists the presence of *Athrotaxis cupressoides* (pencil pine) and *Athrotaxis selaginoides* (king billy pine). Of particular note is an area of *Sphagnum* peatland adjacent to rainforest communities that contains emergent pencil pines.

Examples of evolution in mainland mammals

The Northbarker Flora and Fauna Assessment of Hall's Island notes the presence of the Tasmanian sub-species of Bennett's wallaby - *Macropus rufogriseus* and common ringtail possum - *Pseudocheirus peregrinus*

Undisturbed catchments, lakes and streams

The TWWHA Management Plan states that approximately 25 per cent of Tasmania's lakes, tarns, lagoons and wetlands are in the TWWHA and that many of these occur above an altitude of 1,000 metres on the Central Plateau (i.e. areas adjacent to the proposed development site).

### Threats and proposed mitigation

Potential threats to these values resulting from trampling of vegetation, unmanaged fires and the introduction of pests, weeds and pathogens.

#### Trampling of sensitive vegetation

*Sphagnum* moss is easily crushed and broken up by trampling, causing channels to form in the disturbed *sphagnum* moss, resulting in erosion and changes to natural drainage patterns, which can ultimately lead to the bog drying out. This could quickly and permanently alter the *Sphagnum* peatland communities found on Hall's Island and at nearby the helicopter landing site.

The proponent has stated that a range of measures will be used to avoid damaging sensitive vegetation communities, including:

- avoiding routes through Sphagnum peatlands
- installing raised, perforated boardwalks where required
- education and supervision of visitors in relation to their potential to impact through trampling
- siting of the Standing Camp in Lichen lithosphere community (i.e. on an area of hard-wearing, exposed bedrock) or *Eucalyptus subcrenulata* forest and woodland (considered a common and resilient community)
- creation of zones which exclude visitors from sensitive communities
- installing infrastructure using hand and battery-operated tools only, with minimal ground disturbance, no excavations or changes to water-courses.
- following the foot pad proposed in the Northbaker report *Proposed Helicopter Landing Site and Access* (June 2018) for access from the helicopter landing site to the Lake Malbena shore (for access to Hall's Island).

If these proposed measures are implemented and adhered to, vegetation trampling impacts on Hall's Island and at the helicopter landing site should be effectively mitigated.

#### Fire

The Northbarker Flora and Fauna Assessment of Hall's Island notes that the island contains patches of fire sensitive vegetation in the form of Sphagnum peatland, *Athrotaxis selaginoides* (King Billy Pine) rainforest and to a lesser extent a community of highland low rainforest and scrub. Additionally, populations of the endemic conifers *Pharosphaera hookeriana* (listed as Vulnerable under Tasmania's *Threatened Species Protection Act 1995*) and *Diselma archeri* are very fire sensitive. Fire resulting from the proposed operation could have long term destructive impacts on the island and in the TWWHA more broadly.

The Proponent intends to mitigate fire risk by:

- implementing a *Fire Management Subplan* prior to and during all proposed activities
- offering Hall's Island as a non-smoking destination
- providing electric or gas heating, with no open flames
- ensuring that all necessary and appropriate fire retardation and fire-fighting equipment and devices (including those required by Law) are installed, upgraded and maintained in good working order and condition, and are readily available for use
- not permitting outside fires / immediately extinguishing accidental fires
- using 12V electric and hand-tools during construction (a small four-stroke generator may be used to charge equipment during construction activities -this will be located on exposed bedrock to avoid and mitigate any potential for fire resulting from malfunction of the generator.)
- not storing aviation fuel or undertaking any helicopter refuelling operation at the Hall's Island helipad or nearby

If these proposed measures are implemented and adhered to, impacts resulting from unmanaged fire on Hall's Island, at the helicopter landing site and in the TWWHA more broadly should be effectively mitigated.

#### Introduced species

The Northbarker Flora and Fauna Assessment of Hall's Island, notes that the vegetation communities on the island are relatively resilient to weed invasion. The report recognises that orange hawkweed *Hieracium aurantiacum* is a threat to *Sphagnum* communities and is present at the Derwent Bridge / Lake St Clair area.

The construction, operation and re-supply of the standing camp may allow for introduction of weeds, pathogens or feral animals, with long term impacts on the natural values of the site and the TWWHA more broadly. For example, the freshwater algal pest *Didymosphenia geminata*, Didymo, could be transmitted on contaminated recreation equipment used by international travelers visiting the site. Similarly, plant pathogens that may impact endemic conifers and other plant genera (Criteria viii and ix) at the site could be inadvertently introduced.

Chytrid fungus (*Batrachochytrium dendrobatidis*), is present in Tasmania, and impacting frog species across much of the state. The TWWHA, however, is still largely free of disease (Tasmanian Parks and Wildlife website). Species affected by this pathogen include the Tasmanian tree frog *Litoria burrowsi* (which is listed in the values for the TWWHA under Criteria (ix)).

The fungal pathogen *Mucor amphibiorum* (Platypus Fungal Disease - Mucormycosis) represents a significant threat to Tasmanian platypus. As monotremes, platypus are relevant to Criterion (ix)

The Proponent intends to mitigate the risk of introducing pests, weed and diseases by:

- developing a hygiene plan in accordance with DPIPWE (2015) *Weeds and Disease Planning and Hygiene Guidelines – Preventing the spread of weeds and diseases in Tasmania* to cover construction and operational phases of the project and quality control checks during construction and operations
- implementing 'Keeping It Clean' training provided by NRM South – with final check and disinfection processes applied at Derwent Bridge, prior to departure for Hall's Island (this will be incorporated into the project's Operations Manual).
- requiring staff and visitors to properly clean, dry and disinfect waders and other aquatic-related equipment and clothing (e.g. kayaks and fishing gear) prior to accessing the area for fishing, especially if people have been fishing overseas (this will be incorporated into the project's Operations Manual).
- ensuring that clients adhere to 'Leave No Trace' principles and techniques, including for the prevention of infection by *Phytophthora* species

If these proposed measures are implemented and adhered to, impacts resulting from introduced species on Hall's Island and at the helicopter landing site should be effectively mitigated. Note that the Australian Government Guidelines *Arrive Clean, Leave Clean* are also relevant.

#### Contamination of undisturbed catchments, lakes and streams

Tasmania's Central Plateau area is a stronghold for two species of endemic freshwater fish: western paragalaxias (*Paragalaxias julianus*) and Clarence galaxias (*Galaxias johnstoni*). Tasmania's highland lakes and tarns, lagoons and wetlands also have a high degree of invertebrate endemism.

The Proponent intends to mitigate the risk of contaminating Lake Malbena through

- installation of complete-capture sewage and greywater pods.
- back-loading of greywater with each trip, for disposal outside of the TWWHA.
- annual collection of sewage in pods to be emptied off site
- ensuring that all garbage, rubbish and refuse generated is properly collected and stored in a manner that it cannot be accessed by animals and properly disposed of (i.e. not burnt) at an authorised waste disposal site at the end of each stay
- use of recyclable, compostable and/or reusable containers and wrappers wherever possible, no use of plastic bags or single use plastic bottles.

If these proposed measures are implemented and adhered to, water quality impacts resulting from the proposed activity site should be effectively mitigated



### Other Issues

The proponent needs to clarify that the activity will be non-smoking (The *RAA, lease and licence conditions* allow for smoking *only in permitted area*).

The issue of appropriate gas storage is not addressed.

## Relevant Management Plans

Name, date and SPIRE or hyperlink for plan	Plan covers: World Heritage	Advice whether the Action proposed may be consistent with this plan
<p><u>Tasmanian Wilderness World Heritage Area Management Plan 2016</u></p> <p>As a State Party to the World Heritage Convention, the Australian Government has an obligation to ensure that the requirements of the Convention are fully met. In particular, it is required to identify, protect, conserve, present, transmit, and, where appropriate, rehabilitate, the cultural and natural heritage of the TWWHA. These obligations are intended to be met through the TWWHA Management Plan.</p>	<p><b>World Heritage</b></p>	<p>The Action proposed would not be inconsistent with the <i>Tasmanian Wilderness World Heritage Area Management Plan 2016</i>.</p> <p>The Management Plan includes Hall's Island, Lake Malbena and the adjacent helicopter landing site within the 'Self Reliant Recreation' zone of the TWWHA (Map 22, p204) and designates a Wilderness Value rating of 14-16 (Map 7, p176).</p> <p>The Management Plan describes the Self-Reliant Recreation Zone as: <i>generally an area where visitors can conduct recreational activities that require a challenging and relatively unmodified setting, including activities delivered by commercial enterprises.</i> (p62).</p> <p>The Self-Reliant Recreation Zone aims to:</p> <ul style="list-style-type: none"> <li>• conserve natural and cultural values in an area subject to low-level, but potentially significant, recreation use;</li> <li>• maintain, as far as possible, characteristics of remoteness and isolation; and</li> <li>• retain a largely unmodified natural setting for a challenging experience that meets the needs of a relatively low number of self-reliant recreation users.(P.63)</li> </ul> <p>In the Self Reliant Recreation zone: <i>infrastructure, such as tent platforms, toilets and hardened tracks, may be installed to mitigate environmental damage or to provide for recreational use appropriate for the zone</i> (p63).</p>
<p><u>Parks and Wildlife Service Standing Camp Policy 2006</u></p>	<p>All land managed by the Parks and Wildlife Service in Tasmania</p>	<p>The Action proposed would not be inconsistent with the Tasmanian Parks and Wildlife Service Standing Camp Policy 2006.</p> <p>This policy allows for "Type C" standing camps – where the camp remains fully intact and set up for the entire year. <i>"Type C standing camps may also be considered .... where access is exceptionally remote or difficult."</i></p> <p>The policy stipulates that:</p> <ul style="list-style-type: none"> <li>• <i>The camp will be constructed of light demountable materials.</i></li> <li>• <i>Use of boardwalks within the camp will be considered if they reduce ground impacts. The boardwalks should be removable and the ground underneath easily rehabilitated.</i></li> <li>• <i>All rubbish including packaging and vegetable scraps are to be removed at the end of each trip.</i></li> </ul>

<u>Arrive Clean, Leave Clean:</u> <u>Guidelines to help prevent the spread of invasive plant diseases and weeds threatening our native plants, animals and ecosystems</u>	Australian Government Advice	The Action proposed should comply with these guidelines
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### **Summary of Advice**

The proposed development has potential to impact on the natural and cultural World Heritage Values of the TWWHA.

The proposed development occurs within the Self-Reliant Recreation zone of the TWWHA and would not be inconsistent with the prescriptions of the 2016 TWWHA Management Plan for activities within this zone.

The proposed development complies with the Tasmanian Parks and Wildlife Service Standing Camp Policy (2006).

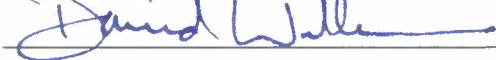
The proponent has identified and intends to implement a range of measures to mitigate potential impacts of the development on the natural and cultural values of the TWWHA. If these proposed measures are implemented and adhered to, impacts resulting from the proposed Hall's Island Standing Camp and tourism operation will be effectively mitigated.

### **Primary Heritage Contact Officer for ongoing contact through Assessment/Approval stages**

s22 [REDACTED] Assistant Director, Natural Heritage Section \_\_\_\_/\_\_\_\_/\_\_\_\_

### **Cleared By**

~~[Sign and include name, position and date]~~



David Williams, Assistant Secretary, Heritage Branch 23 / 7 / 18

## Sources

*Alpine Sphagnum Bogs and Associated Fens A nationally threatened ecological community Environment Protection and Biodiversity Conservation Act 1999 Policy Statement 3.16*  
<http://www.environment.gov.au/system/files/resources/b08acec6-6a27-4e71-8636-498719b253b4/files/alpine-sphagnum-bogs.pdf>

*Arrive Clean, Leave Clean: Guidelines to help prevent the spread of invasive plant diseases and weeds threatening our native plants, animals and ecosystems (Australian Government 2015)*

*Frogs of Tasmania* <http://www.parks.tas.gov.au/index.aspx?base=3060>

*Northbarker Report - Hall's Island, Lake Malbena, Walls of Jerusalem, Flora and Fauna Assessment (21 November 2016)*

*Northbarker Report - Hall's Island, Lake Malbena, Walls of Jerusalem, Proposed Helicopter Landing Site and Access to Halls Island Vegetation Survey For Wild Drake Pty Ltd (14 June 2018)*

*Tasmanian Hygiene Guidelines:*

<http://dpiwwe.tas.gov.au/Documents/Weed%20%20Management%20and%20Hygiene%20Guidelines.pdf>

*Tasmanian Tree Frog* <http://www.parks.tas.gov.au/?base=5227>

*Tasmanian Parks and Wildlife Service Standing Camp Policy 2006*

*Tasmanian Wilderness World Heritage Area Management Plan 2016*

[http://dpiwwe.tas.gov.au/Documents/TWWHA\\_Management\\_Plan\\_2016.pdf](http://dpiwwe.tas.gov.au/Documents/TWWHA_Management_Plan_2016.pdf)

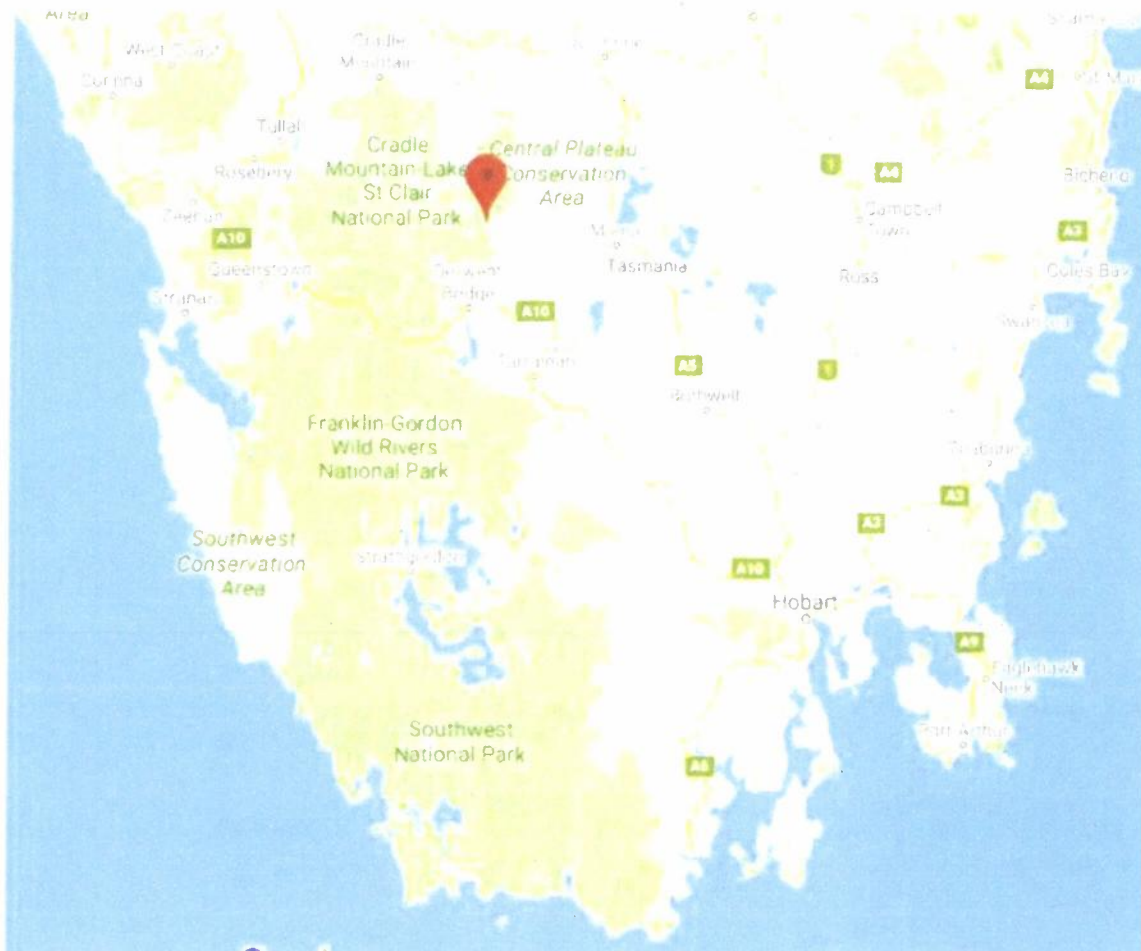
*Threat abatement plan - Infection of amphibians with chytrid fungus resulting in chytridiomycosis Department of the Environment and Energy, 2016*

<http://www.environment.gov.au/biodiversity/threatened/publications/tap/infection-amphibians-chytrid-fungus-resulting-chytridiomycosis-2016>

*World Heritage values that contribute to the property's Outstanding Universal Value:*

<http://www.environment.gov.au/heritage/places/world/tasmanian-wilderness/values>

## Laker Malbena location





s22

---

**From:** s22  
**Sent:** Wednesday, 22 August 2018 12:46 PM  
**To:** s22  
**Cc:** s22  
**Subject:** Hall's Island [SEC=UNCLASSIFIED]  
**Attachments:** Signed submission TWWHA MP.pdf

Hi s22

If you want further background, s47(1)(a) but we suggest you use this:

**The Department reviewed the final draft Management Plan for the Tasmanian Wilderness World Heritage Area, finding that it:**

- **gives effect, or is consistent with, the 2016 decision of the World Heritage Committee**
- **gives effect, or is consistent with, the recommendations of the 2015 World Heritage Reactive Monitoring Mission to Tasmania**
- **is not inconsistent with the Australian World Heritage Management Principles as set out in Schedule 5 of the *Environment Protection and Biodiversity Conservation Regulations 2000* (EPBC Regulations).**

Thanks

s22  
Assistant Director  
Natural Heritage Section  
Department of the Environment and Energy  
02 6274 s22



Name	Listed species	Fire concerns	WHA criteria	Helicopter	WHA standing camp	Wilderness experience	WHA other	Non MNES RAA process, TWWHA Mgmt plan process	Non MNES commenity of other users	Non-MNES issues raised
2018-8177-Referral-Submission-01-Tas-Greens-20180410.pdf										Clarification of consultation
2018-8177-Referral-Submission-02- <sup>s47F</sup> -20180410.pdf				X	X		X	X		
2018-8177-Referral-Submission-03- <sup>s47F</sup> -11.4.2018.pdf			X	X			X			
2018-8177-Referral-Submission-04- <sup>s47F</sup> -12.4.2018.pdf	X	X	X					X		
2018-8177-Referral-Submission-05- <sup>s47F</sup> -13.4.2018.pdf				X						
2018-8177-Referral-Submission-06- <sup>s47F</sup> -13.4.2018.pdf									X	
2018-8177-Referral-Submission-07- <sup>s47F</sup> -14.4.2018.pdf						X				
2018-8177-Referral-Submission-08-Hobart Walking Club-15.4.2018.pdf				X		X			X	
2018-8177-Referral-Submission-09- <sup>s47F</sup> -15.4.2018.pdf	X		X	X		X				
2018-8177-Referral-Submission-10- <sup>s47F</sup> -15.4.2018.pdf				X		X				
2018-8177-Referral-Submission-11- <sup>s47F</sup> -16.4.2018.pdf										sufficiency of information i
2018-8177-Referral-Submission-12-Aust Heritage Council-16.4.2018.pdf	X		X							sufficiency of information i
2018-8177-Referral-Submission-13- <sup>s47F</sup> -20180418.pdf				X					X	
2018-8177-Referral-Submission-14-CHWC-16.4.2018.pdf			X							sufficiency of information i
2018-8177-Referral-Submission-15-Anglers Alliance Tas-13.4.2018.pdf				X					X	
2018-8177-Referral-Submission-16- <sup>s47F</sup> -17.4.2018.pdf										doesn't like development i
2018-8177-Referral-Submission-17- <sup>s47F</sup> -17.4.2018.pdf	X			X						
2018-8177-Referral-Submission-18- <sup>s47F</sup> -17.4.2018.pdf			X	X				X	X	
2018-8177-Referral-Submission-19- <sup>s47F</sup> -16.4.2018.pdf	X	X	X	X	X			X		sufficiency of information i
2018-8177-Referral-Submission-20- <sup>s47F</sup> -16.4.2018 and 17.4.2018.pdf			X	X				X	X	
2018-8177-Referral-Submission-21- <sup>s47F</sup> -17.4.2018.pdf				X						
2018-8177-Referral-Submission-22- <sup>s47F</sup> -17.4.2018.pdf				X						
2018-8177-Referral-Submission-23- <sup>s47F</sup> -17.4.2018.pdf					X					
2018-8177-Referral-Submission-24-Pandani Bushwalking Club Inc-17.4.2018.pdf			X						X	sufficiency of information i
2018-8177-Referral-Submission-25- <sup>s47F</sup> -17.4.2018.pdf			X	X		X		X	X	
2018-8177-Referral-Submission-26- <sup>s47F</sup> -17.4.2018.pdf	X		X					X		
2018-8177-Referral-Submission-27-Huon Licensed Anglers Assoc-17.4.2018.pdf				X					X	
2018-8177-Referral-Submission-28- <sup>s47F</sup> -17.4.2018.pdf				X					X	sufficiency of information i
2018-8177-Referral-Submission-29-Duplicate of 25.pdf										
2018-8177-Referral-Submission-30-Sthn Tas Licensed Anglers Assoc-17.4.2018.pdf			X	X		X				
2018-8177-Referral-Submission-31- <sup>s47F</sup> -17.4.2018.pdf	X	X	X					X		
2018-8177-Referral-Submission-32-TNPA-17.4.2018.pdf			X			X				sufficiency of information i
2018-8177-Referral-Submission-33- <sup>s47F</sup> -17.4.2018.pdf			X							
2018-8177-Referral-Submission-34-Duplicate of 16.pdf										
2018-8177-Referral-Submission-35-Anglers Alliance Tas2-17.4.2018.pdf			X	X				X		
2018-8177-Referral-Submission-36-Nat Parks Wildlife Advisory Council Tas-17.4.2018.pdf	X			X				X		
2018-8177-Referral-Submission-37- <sup>s47F</sup> -17.4.2018.pdf				X		X				
2018-8177-Referral-Submission-38- <sup>s47F</sup> -17.4.2018.pdf				X						opposes use of huts for co
2018-8177-Referral-Submission-39- <sup>s47F</sup> -17.4.2018.pdf									X	
2018-8177-Referral-Submission-40- <sup>s47F</sup> -16.4.2018.pdf	X		X	X		X				
2018-8177-Referral-Submission-41- <sup>s47F</sup> -16.4.2018.pdf				X						
2018-8177-Referral-Submission-42- <sup>s47F</sup> -16.4.2018.pdf					X	X		X	X	
2018-8177-Referral-Submission-43- <sup>s47F</sup> -16.4.2018.pdf				X				X		
2018-8177-Referral-Submission-44- <sup>s47F</sup> -16.4.2018.pdf					X	X		X		

[n by proponent](#)

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[mmercial tourism](#)

[in referral](#)

## Comments received 2nd public comment period

## Halls Island. Lake Malbena 2018-8177

Name	Listed specie: Fire concerns WHA criteria Helicopter	WHA standin Wilderness e:WHA other	Non MNES RAA process, amenity of	Non MNES Non-MNES issi Campaign	Stage 2
2018-8177 Referral 2nd public comment period submission 1s47F .msg				X	
2018-8177 Referral 2nd public comment period submission 2s47F .campaign.msg				X	
2018-8177 Referral 2nd public comment period submission 3s47F .campaign.msg				X	
2018-8177 Referral 2nd public comment period submission 4s47F .campaign.msg				X	
2018-8177 Referral 2nd public comment period submission 5s47F .msg				X	
2018-8177 Referral 2nd public comment period submission 6s47F .msg				X	
2018-8177 Referral 2nd public comment period submission 7s47F .msg				X	
2018-8177 Referral 2nd public comment period submission 8s47F .msg				X	
2018-8177 Referral 2nd public comment period submission 9s47F .msg				X	
2018-8177 Referral 2nd public comment period submission 10s47F .msg		X			
2018-8177 Referral 2nd public comment period submission 11s47F .msg		X			
2018-8177 Referral 2nd public comment period submission 12s47F .msg		X			
2018-8177 Referral 2nd public comment period submission 13s47F .msg		X			
2018-8177 Referral 2nd public comment period submission 14s47F .campaign.msg				X	
2018-8177 Referral 2nd public comment period submission 15s47F .docx	X	X	X		
2018-8177 Referral 2nd public comment period submission 16s47F .msg				X	
2018-8177 Referral 2nd public comment period submission 17s47F .msg	X				
2018-8177 Referral 2nd public comment period submission 18s47F .msg	X				
2018-8177 Referral 2nd public comment period submission 19s47F .msg	X	X	X		
2018-8177 Referral 2nd public comment period submission 20s47F .msg	X		X	X	
2018-8177 Referral 2nd public comment period submission 21s47F .campaign.msg				X	
2018-8177 Referral 2nd public comment period submission 22s47F .msg	X		X	X	
2018-8177 Referral 2nd public comment period submission 23s47F .campaign.msg				X	
2018-8177 Referral 2nd public comment period submission 24s47F .msg	X		X	X	
2018-8177 Referral 2nd public comment period submission 25s47F .msg				X	
2018-8177 Referral 2nd public comment period submission 27s47F .msg	X	X	X		
2018-8177 Referral 2nd public comment period submission 28s47F .msg	X				
2018-8177 Referral 2nd public comment period submission 29s47F .msg	X	X			
2018-8177 Referral 2nd public comment period submission 30s47F .msg	X		X		
2018-8177 Referral 2nd public comment period submission 31s47F .msg	X			X	
2018-8177 Referral 2nd public comment period submission 32s47F .msg	X				
2018-8177 Referral 2nd public comment period submission 33 NPWAC.msg	X	X	X		
2018-8177 Referral 2nd public comment period submission 34s47F .msg		X	X		
2018-8177 Referral 2nd public comment period submission 35s47F .msg		X			
2018-8177 Referral 2nd public comment period submission 36 North west walking club.msg			X		
2018-8177 Referral 2nd public comment period submission 37s47F .msg		X			
2018-8177 Referral 2nd public comment period submission 38s47F .msg		X			
2018-8177 Referral 2nd public comment period submission 39 National Heritage Council.msg	X		X		
2018-8177 Referral 2nd public comment period submission 40s47F .msg			X		
2018-8177 Referral 2nd public comment period submission 41s47F .msg		X			
2018-8177 Referral 2nd public comment period submission 42s47F .msg	X	X			
2018-8177 Referral 2nd public comment period submission 43 Hobart Walking Club.msg	X	X	X		
2018-8177 Referral 2nd public comment period submission 44 Bushwalking Tasmania.msg	X	X	X		
2018-8177 Referral 2nd public comment period submission 45s47F .msg		X	X		
2018-8177 Referral 2nd public comment period submission 46s47F .msg	X	X	X		
2018-8177 Referral 2nd public comment period submission 47s47F .msg	X	X	X		
2018-8177 Referral 2nd public comment period submission 48 Bob Brown foundation.msg	X	X	X		
2018-8177 Referral 2nd public comment period submission 49 Tas Wilderness Society.msg	X	X	X	X	
2018-8177 Referral 2nd public comment period submission 50 Pandani Bushwalking club.msg	X	X	X		
2018-8177 Referral 2nd public comment period submission 51a Aboriginal Heritage Council.msg					X
2018-8177 Referral 2nd public comment period submission 51b Aboriginal Heritage Council.pdf					X
2018-8177 Referral 2nd public comment period submission 52s47F .msg		X	X		
2018-8177 Referral 2nd public comment period submission 53s47F .msg		X			
2018-8177 Referral 2nd public comment period submission 54 Tas Fly Tyers club.msg		X	X		
2018-8177 Referral 2nd public comment period submission 55s47F .msg		X	X		
2018-8177 Referral 2nd public comment period submission 56s47F .msg		X	X		
2018-8177 Referral 2nd public comment period submission 57 EDO.msg		X	X		
2018-8177 Referral 2nd public comment period submission 58s47F .msg		X	X		
2018-8177 Referral 2nd public comment period submission 59s47F .msg		X	X		
2018-8177 Referral 2nd public comment period submission 60s47F .msg		X	X		
2018-8177 Referral 2nd public comment period submission 61s47F .msg		X	X		
2018-8177 Referral 2nd public comment period submission 62s47F .msg		X	X	X	
2018-8177 Referral 2nd public comment period submission 63 Friends of Great Western Tiers.msg		X	X	X	
2018-8177 Referral 2nd public comment period submission 64s47F .msg		X	X		X
2018-8177 Referral 2nd public comment period submission 65s47F .msg	X	X	X		
2018-8177 Referral 2nd public comment period submission 66 5th Tas anglers assn.msg	X	X	X	X	
2018-8177 Referral 2nd public comment period submission 67 5th Anglers Alliance.msg	X	X	X	X	
2018-8177 Referral 2nd public comment period submission 68s47F .msg	X	X	X	X	
2018-8177 Referral 2nd public comment period submission 69s47F .msg	X	X	X		X
2018-8177 Referral 2nd public comment period submission 70s47F .msg	X	X	X	X	
2018-8177 Referral 2nd public comment period submission 71s47F .msg	X	X	X		
2018-8177 Referral 2nd public comment period submission 72s47F .msg		X	X	X	
2018-8177 Referral 2nd public comment period submission 73 Tas conservation trust.msg		X	X		
2018-8177 Referral 2nd public comment period submission 74s47F .msg		X	X		
2018-8177 Referral 2nd public comment period submission 75s47F .msg		X	X		
2018-8177 Referral 2nd public comment period submission 76s47F .msg	X	X	X	X	
2018-8177 Referral 2nd public comment period submission 77s47F .msg		X	X	X	
2018-8177 Referral 2nd public comment period submission 78 Mr s47F .msg	X	X	X		X
2018-8177 Referral 2nd public comment period submission 79 Tas Land Conservancy.msg	X	X	X		
2018-8177 Referral 2nd public comment period submission 80s47F .msg		X	X	X	
2018-8177 Referral 2nd public comment period submission 81s47F .msg		X	X	X	
2018-8177 Referral 2nd public comment period submission 82s47F .msg	X	X	X		
2018-8177 Referral 2nd public comment period submission 83s47F .msg	X	X	X		
2018-8177 Referral 2nd public comment period submission 84s47F .msg		X	X		
2018-8177 Referral 2nd public comment period submission 85s47F .msg		X	X		
2018-8177 Referral 2nd public comment period submission 86 Tas National Parks Assoc.msg	X	X	X		
2018-8177 Referral 2nd public comment period submission 87s47F .msg	X	X		X	
2018-8177 Referral 2nd public comment period submission 88s47F .msg		X	X		
2018-8177 Referral 2nd public comment period submission 20s47F .msg					X

Level 6, 134 Macquarie Street, Hobart TAS  
GPO Box 1550, Hobart, TAS 7001 Australia



Enquiries: s22  
Ph: (03) 6165 s22  
Email: s22 [epa.tas.gov.au](mailto:s22@epa.tas.gov.au)  
Web: [www.epa.tas.gov.au](http://www.epa.tas.gov.au)  
Our Ref: EN-EM-AV-068963; H839619

09 April 2018

Ms s22  
Director  
Victoria and Tasmania Assessment Section  
Assessments (Qld, Tas, Vic) & Policy Implementation Branch  
Department of the Environment and Energy  
GPO Box 787  
CANBERRA ACT 2601

s22 [@environment.gov.au](mailto:s22@environment.gov.au)

Dear Ms s22

**Halls Island Standing Camp, Lake Malbena, Tasmania**  
**EPBC reference: 2018/8177**

I refer to your request dated 29 March 2018 inviting comment on several aspects of the assessment of this proposal under the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*.

Under authorisation from the Minister for Environment, I advise that:

- I do not intend to provide any information on whether the proposed action is likely to have a significant impact on any of the matters protected under the *EPBC Act*;
- I have no comment to make with respect to which approach would be appropriate to assess the possible impacts of the project, in the event that it is determined to be a “controlled action”; and
- It is not my current intention that the proposed action will be assessed by the Board of the Environment Protection Authority under the Tasmanian *Environmental Management and Pollution Control Act 1994* and therefore it cannot be assessed under the bilateral agreement between the Commonwealth of Australia and the State of Tasmania made under section 45 of the *EPBC Act*.

Yours sincerely

Wes Ford  
**DIRECTOR, ENVIRONMENT PROTECTION AUTHORITY**

Department of Primary Industries, Parks, Water & Environment  
NATURAL AND CULTURAL HERITAGE DIVISION

Hobart GPO Box 44, Hobart, Tasmania, 7001  
Launceston PO Box 46, Kings Meadows, Tasmania, 7249  
Devonport PO Box 303, Devonport, Tasmania, 7310  
Ph 1300 368 550  
Web [www.dpipwe.tas.gov.au](http://www.dpipwe.tas.gov.au)

FOI 180902  
Document 12



6 April 2018

Ms s22 d  
Director  
Victoria / Tasmania Assessments Section  
Assessments & Governance Branch  
Department of the Environment and Energy  
GPO Box 787  
CANBERRA ACT 2601

**Invitation to comment on referral: Halls Island Standing Camp, Lake Malbena,  
Tasmania (EPBC 2018/8177)**

Thank you for your letter of 29 March requesting information and advice on the potential impact on matters of national environmental significance of the proposed Halls Island Standing Camp at Lake Malbena.

This proposal was reviewed by my Department in October 2017 through the Reserve Activity Assessment process under which proposed activities in areas reserved under the *Nature Conservation Act 2002* are formally assessed for their potential impact on natural and cultural values protected by Tasmanian legislation and policy.

In evaluating the proposal the following conclusions were provided to the Tasmanian Parks and Wildlife Service:

**General:**

- It was noted that the helipad is proposed for a site to the east of Halls Island, along with a walking track from the helipad to the lake edge. It was also noted that further walking tracks are proposed near Mount Oana and to the east of the island. Based on a desktop assessment, it appears that the helipad and some of these proposed tracks have the potential to impact on listed threatened native vegetation communities (sphagnum peatland); it also appears – based on the supplied fauna and flora habitat assessment (North Barker 2016) – that these areas were not surveyed as part of the onground assessment. The size, form and location of these structures will determine whether they will have an impact on natural values. DPIPWE supports the construction of this infrastructure to avoid disturbance to vegetation as much as practicable.



- The documentation notes that fewer than 10 small parties currently visit the island each year (this is significantly fewer than some areas within the Tasmanian Wilderness World Heritage Area Wilderness Zone) and that the current proposal would increase the visitation to up to 150 people a year. The proposed management of these numbers should be sufficient to minimise impacts; however, this may need to be reviewed if in the future there is any proposal to increase visitation). However the suggestion to utilise minimal impact bushwalking techniques for some of the proposed surrounding walks will need to be carefully assessed against vegetation values; the impacts of visitation at the proposed level may be lessened by creating hardened tracks.
- The avoidance and mitigation measures outlined in North Barker 2016 were supported.
- It is recommended that it be clearly stated that no helicopter refuelling operations or fuel storage etc. is to be undertaken on site.
- No sewage, grey water, and sediment should be allowed to enter lake/streams in order to protect aquatic fauna (which has high endemism).
- While it is acknowledged that helicopters are constrained by their operational parameters and their capacity to avoid flying near eagles nest is constrained by conditions; it is recommended that, where possible, helicopters do not fly within 1km line-of-sight of known eagles nests during the breeding season (June to January inclusive), and specifically that tours do not include a 'viewing' of the nest.

#### Geoconservation:

- It is considered unlikely that the proposal will cause any significant impact to the two Tasmanian Geoconservation Diversity (TGD) listed sites mapped in the vicinity (Central Highlands Cenozoic Glacial Area, and Central Plateau Terrain). However, the proposed imagery as part of this assessment but appear very similar to those mapped as the TGD listed site Clarence Lagoon Striped Mires. Such mires are considered to be of significance from a geoconservation perspective while the flora aspect is regarded an Outstanding Universal Value. They are highly sensitive to both fire and trampling. It is recommended that minor modification walking track/route to Mt Oana would skirt a patterned mire, while the helipad and access track cross another. These two patterned mires have been newly identified from satellite to the proposed Mt Oana walking track/route and to the helipad location be made to avoid degradation of these mires. Their approximate location is outlined in red on the map below.







### **Threatened flora and threatened native vegetation communities:**

- Based on the information provided, there appears to be no significant vegetation-related issues for Hall's Island itself, provided the proponent agrees to adopt, in full, the recommendations and mitigation measures outlined in North Barker 2016 for the protection of the two threatened vegetation communities (*Sphagnum* peatland and *Athrotaxis selaginoides* rainforest), fire sensitive vegetation (MSP, RKP and RSH) and flora species (*Pherosphaera hookeriana*, *Athrotaxis selaginoides*, *Athrotaxis cupressoides*, *Diselma archeri*) identified as present on the island. ✓
- It is recommended that threatened plants (Mount Mawson pines) near to the work areas should be flagged to avoid any inadvertent disturbance during construction. The island landing should be located such that these plants do not need to be removed, but if this is not practicable or safe, and any of these threatened pines need to be taken, then a permit to take under the *Threatened Species Protection Act 1995* will be required from DPIPWE prior to any impact. —
- Staff and contractors working onsite should be made aware of the location of threatened plants and threatened native vegetation communities to ensure no inadvertent impact to these natural values.
- As mentioned in the geoconservation comments, the proposed helipad (exact location and specifications not provided) appears to be in a patch of patterned *Sphagnum* mire (a form of the threatened *Sphagnum* peatland community), which is both threatened and an Outstanding Universal Value for the TWHHA. As noted earlier, it is recommended that areas of patterned mire are avoided and protected from impact.



### **Weeds and diseases:**

- It is recommended that as a condition of any approvals that the proponent be required to have a biosecurity hygiene plan developed (and implemented) to ensure the development and associated works/activities do not result in the introduction of new declared or environmental weed species into the area or the translocation of weeds or other threats. The hygiene plan should be developed in accordance with DPIPWE (2015).

*Weed and Disease Planning and Hygiene Guidelines - Preventing the spread of weeds and diseases in Tasmania* which can be found at:

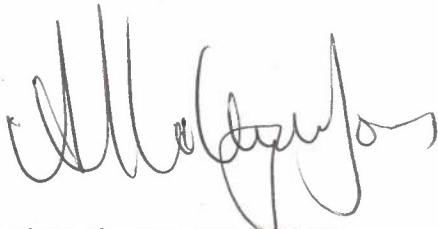
<http://dipwwe.tas.gov.au/Documents/Weed%20%20Management%20and%20Hygiene%20Guidelines.pdf>

and should cover construction and operational phases of the project, quality control checks during construction and operations (and who will monitor compliance with agreed biosecurity measures) and a list of management actions that will be implemented (and by whom) if any weeds or other threats are identified during construction or operations. Issues/threats to consider should include plant seeds, invertebrates, aquatic alga and pathogens, plant pathogens.

- Neoprene waders are a significant biosecurity risk for the movement of pests and pathogens (e.g. didymo) and staff and visitors involved with this proposal should be required to properly clean, dry and disinfect their waders prior to accessing the area for fishing, especially if people have been fishing overseas. This also applies to any other aquatic-related equipment and clothing (e.g. kayaks and fishing gear).

In short, the Reserve Activity Assessment concluded that impacts to natural and cultural values could be minimised provided the proposed mitigation measures were implemented in full, and provided the proponents undertook appropriate natural values surveys for those elements – additional walking tracks and helipad location – not detailed in the proposal, and subsequently avoided impacting on any identified values.

Yours sincerely



**ALICE HOLEYWELL-JONES**  
**ACTING GENERAL MANAGER**  
**NATURAL AND CULTURAL HERITAGE**





EPBC Ref: 2018/8177

Ms s22  
Personal Assistant to General Manager NCH  
Department of Primary Industries, Parks, Water and Environment  
GPO Box 44  
HOBART TAS 7001

Dear Ms s22

**Decision on referral  
Halls Island Standing Camp, Lake Malbena, Tasmania (EPBC 2018/8177)**

I am writing to you, as the delegated contact for the Tasmanian Minister for Environment, The Hon Elise Archer MP. This is to advise you of my decision about the proposed action to construct and operate a small-scale tourist operation, including a standing camp on Halls Island, Lake Malbena and helicopter access, approximately 20 kilometres north-east of Derwent Bridge, Tasmania, referred for a decision under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

As a delegate of the Minister for the Environment, I have decided that the proposed action is not a controlled action. This means it does not require further assessment and approval under the EPBC Act before it can proceed. A copy of the document recording this decision is enclosed. This document will be published on the Department's website.

Please note that this decision relates only to the specific matters protected under Chapter 2 of the EPBC Act. This decision does not affect any requirement for separate state or local government environment assessment and approvals of the proposed action.

If you have any questions about this decision, please contact the project manager, s22 by email to s22@environment.gov.au, or telephone 02 6275 s22 and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

James Barker  
Assistant Secretary  
Assessments and Governance Branch  
31 August 2018



EPBC Ref: 2018/8177

The Hon Nigel Scullion  
Minister for Indigenous Affairs  
Parliament House  
CANBERRA ACT 2600

Dear Minister

**Decision on referral  
Halls Island Standing Camp, Lake Malbena, Tasmania (EPBC 2018/8177)**

I am writing to you in relation to the proposal by Wild Drake Pty Ltd to construct and operate a small-scale tourist operation, including a standing camp on Halls Island, Lake Malbena and helicopter access, approximately 20 kilometres north-east of Derwent Bridge, Tasmania, referred for a decision under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

As a delegate of the Minister for the Environment, I have decided that the proposed action is not a controlled action. This means it does not require further assessment and approval under the EPBC Act before it can proceed. A copy of the document recording this decision is enclosed. This document will be published on the Department's website.

Please note that this decision relates only to the specific matters protected under Chapter 2 of the EPBC Act. This decision does not affect any requirement for separate state or local government environment assessment and approvals of the proposed action.

Questions about this decision can be directed to s22 [redacted] by email to s22 [redacted]@environment.gov.au, or telephone 02 6274 s22 [redacted].

Yours sincerely

James Barker  
Assistant Secretary  
Assessments and Governance Branch  
31 August 2018





EPBC Ref: 2018/8177

The Hon Simon Birmingham  
Minister for Trade, Tourism and Investment  
Parliament House  
CANBERRA ACT 2600

Dear Minister

**Decision on referral  
Halls Island Standing Camp, Lake Malbena, Tasmania (EPBC 2018/8177)**

I am writing to you in relation to the proposal by Wild Drake Pty Ltd to construct and operate a small-scale tourist operation, including a standing camp on Halls Island, Lake Malbena and helicopter access, approximately 20 kilometres north-east of Derwent Bridge, Tasmania, referred for a decision under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

As a delegate of the Minister for the Environment, I have decided that the proposed action is not a controlled action. This means it does not require further assessment and approval under the EPBC Act before it can proceed. A copy of the document recording this decision is enclosed. This document will be published on the Department's website.

Please note that this decision relates only to the specific matters protected under Chapter 2 of the EPBC Act. This decision does not affect any requirement for separate state or local government environment assessment and approvals of the proposed action.

Questions about this decision can be directed to s22 [redacted] by email to s22 [redacted]@environment.gov.au, or telephone 02 6274 s22 [redacted]

Yours sincerely

James Barker  
Assistant Secretary  
Assessments and Governance Branch  
3 / August 2018



EPBC Ref: 2018/8177

Mr Wes Ford  
Director EPA  
GPO Box 1550  
HOBART TAS 7005

Dear Mr <sup>Ford</sup> Ford

**Decision on referral**

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

I am writing to you, as the delegated contact for the Tasmanian Minister for Environment, The Hon Elise Archer MP. This is to advise you of my decision about the proposed action to construct and operate a small-scale tourist operation, including a standing camp on Halls Island, Lake Malbena and helicopter access, approximately 20 kilometres north-east of Derwent Bridge, Tasmania, referred for a decision under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

As a delegate of the Minister for the Environment, I have decided that the proposed action is not a controlled action. This means it does not require further assessment and approval under the EPBC Act before it can proceed. A copy of the document recording this decision is enclosed. This document will be published on the Department's website.

Please note that this decision relates only to the specific matters protected under Chapter 2 of the EPBC Act. This decision does not affect any requirement for separate state or local government environment assessment and approvals of the proposed action.

If you have any questions about this decision, please contact the project manager, s22 [redacted] by email to s22 [redacted]@environment.gov.au, or telephone 02 6275 s22 [redacted] and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

James Barker  
Assistant Secretary  
Assessments and Governance Branch  
31 August 2018



EPBC Ref: 2018/8177

Mr s47F  
Director  
Wild Drake Pty Ltd  
PO Box 1061  
LAUNCESTON TAS 7250

Dear Mr s47F

**Decision on referral**

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

Thank you for submitting a referral under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This is to advise you of my decision about the proposed action to construct and operate a small-scale tourist operation, including a standing camp on Halls Island, Lake Malbena and helicopter access, approximately 20 kilometres north-east of Derwent Bridge, Tasmania.

**As a delegate of the Minister for the Environment, I have decided that the proposed action is not a controlled action. This means that the proposed action does not require further assessment and approval under the EPBC Act before it can proceed.**

A copy of the document recording this decision is enclosed. This document will be published on the Department's website.

Please note that this decision relates only to the specific matters protected under Chapter 2 of the EPBC Act.

This decision does not affect any requirement for separate state or local government environment assessment and approvals of the proposed action.

In addition, you may need to seek a permit under Chapter 5 of the EPBC Act if the action will relevantly impact on listed species in or on a Commonwealth land or the Commonwealth marine environment. Further information may be obtained by calling 1800 803 772 or visiting the Department's web site at [www.environment.gov.au/epbc/](http://www.environment.gov.au/epbc/).

The Department has an active audit program for proposals that have been referred under the EPBC Act. The audit program aims to ensure that proposals are implemented as planned. Please note that your project may be selected for audit by the Department at any time and all related records and documents may be subject to scrutiny. Information about the Department's compliance monitoring and auditing program is enclosed.

I have written separately to the Hon Elise Archer MP, Minister for the Environment, the Tasmanian Department of Primary Industries, Parks, Water and Environment and advising them of this decision.

If you have any questions about the referral process or this decision, please contact the project manager, s22 by email to s22@environment.gov.au, or telephone 02 6275 s22 and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely



James Barker  
Assistant Secretary  
Assessments and Governance Branch

31 August 2018