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18 December 2025

Dear Mr Eloundou Assomo, Mr Badman and Dr Patricio,

Request for a decision to recommence State of Conservation Reporting and a Reactive Monitoring Mission to assess threats to the Tasmanian Wilderness World Heritage Area at the 48th Session of the UNESCO World Heritage Committee.

1. Further to our letter dated 17 April 2025 and previous correspondence,[1] we write again regarding ongoing threats to the Outstanding Universal Value of the Tasmanian Wilderness World Heritage Area (henceforth Tasmanian Wilderness).
2. Our organisations continue to hold grave concerns about the Australian Government (the State Party) and the Tasmanian Government (the subnational entity) regarding their inadequate management responses to threats to the Tasmanian Wilderness.

[1] Letter_Tasmanian-Wilderness-World-Heritage-Area-and-Maugean-skate_April-2025-final.pdf; UNESCO-World-Heritage-Centre.pdf

3. We note the 4th Global World Heritage Outlook Report (Outlook Report) by the IUCN on the Tasmanian Wilderness finds the current state and trend of values is deteriorating and of high concern, and that overall threats are considered high.[2] We wish to draw some additional information to your attention and, based on this and our concerns detailed below, we strongly disagree that overall protection and management of the site is mostly effective. We therefore wish to respectfully challenge the overall assessment of "good with some concerns."

4. The most urgent matter continues to be the imminent threat of extinction of the Maugean skate. Australian Government communication with UNESCO on this topic has been described as "misleading" by the Australia Institute.[3] However, this is not our only concern.

5. This World Heritage site has major spiritual and cultural importance for Palawa, Tasmanian Aboriginal people, the original owners of Lutruwita/Tasmania. Co-signatories to this letter are committed to supporting Palawa to address the inadequate progress towards assessing, and therefore being able to protect, the cultural values of the site. We further wish to draw to your attention the absence of any progress towards returning any management responsibility, let alone land, to Palawa.

6. Other concerns relate to management responses to recommendations of the 2015 joint ICOMOS and IUCN Reactive Monitoring Mission (RMM) which also remain outstanding. These include biosecurity, invasive species and poor management of boundary areas (RMM Recommendations 18 and 19); and statutory management and tourism development policies that actively encourage damaging commercial development.[4]

7. During the UN Decade of Ecosystem Restoration, the restoration of the flooded Lake Pedder – a 10km² lake submerged under a hydroelectric reservoir 240km² in size - should be a priority. The lake was included in the Tasmanian Wilderness on the basis that it would one day be restored. However, State parties and subnational entities are ignoring timely and salient calls for restoration, despite the aging dam infrastructure that requires major works. This restoration requires open debate and discussion, yet a lack of accountability of the State party and subnational entity is further hampering this discussion from occurring.

8. We appreciate the Outlook Report's recognition that climate change presents a major threat to the Tasmanian Wilderness and provide additional information in relation to the assessment of the management response.

Maugean skate extinction risk remains imminent

9. Conservation Advice for the Maugean skate, prepared by Australia's Federal Department of Climate Change, Energy, the Environment and Water, that remains in effect under Australia's Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) since September 2023, identified key urgent actions requiring implementation prior to the Australian summer of 2023/2024 to prevent the extinction of the Maugean skate. This included, as the highest priority, the elimination or significant reduction of fish

[2] Tasmanian Wilderness | World Heritage Outlook
[3] Labor misleads UNESCO to protect destructive industrial salmon farms - The Australia Institute
[4] World Heritage Watch Report 2024, pp.138-140

biomass and feeding rates in Macquarie Harbour.[5] All other actions were of secondary priority. The Advice also found the impact of fish farms is almost certain to be catastrophic to the skate. Despite this, neither the Federal nor Tasmanian governments have since required any reduction in fish biomass or feeding rates in Macquarie Harbour.

10. Publicly available Departmental advice since then has confirmed salmon farming is the primary human-induced threat and the key action currently regulated under national environmental law. It notes that salmon farming companies will need to engage on their impact on the Maugean skate. The advice also notes that, due to being an attribute of the World Heritage Values of the Tasmanian Wilderness World Heritage Area, any significant impact on the Maugean Skate may also have implications for World Heritage Values and that additional provisions apply to protect these under national environment law. It goes on to say that if aquaculture operations continue this may further diminish recovery prospects for the Maugean skate, the risks of continuing salmon farming include Maugean skate decline and World Heritage Values being compromised, and that the Department is investigating potential breaches of the current conditions.[6,7]
11. In relation to the Outlook Report's assessment of threats from pollution from adjacent fish farms, the current state and trend of Maugean skate, and management responses, the Australia Institute recently obtained July 2025 correspondence from the Australian Government to the Director of the World Heritage Centre and associated briefing material.[8] The briefing attached to the letter reveals that Australian Government officials concluded "a definitive statement on the Maugean Skate population status in Macquarie Harbour is not yet possible." The IUCN Red List assessment draws a similar conclusion and adding that based on the weight of evidence, "…100% of mature individuals occur in one population with an inferred reasonable risk of continuing decline."[9] Therefore, any suggestion from the State Party to the World Heritage Centre that the species appears to be recovering is incorrect, and based on the evidence to date is misleading.[10]
12. The July 2025 Departmental advice is based on 2025 research by the Institute of Marine and Antarctic Studies (IMAS).[11] This report has been misconstrued as providing evidence that the skate population is recovering to levels not seen since 2014. However, there are critically important caveats when interpreting population estimates reaching 2014 levels, caveats which the authors of the IMAS report describe themselves:

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[5] Australian Government (2023) Conservation Advice for Zearajan maugeana (Maugean skate), https://www.environment.gov.au/biodiversity/threatened/species/pubs/83504-conservation-advice06092023 p. 29

[6] Department of Climate Change, Energy, the Environment and Water (2023) EPBC Act Reconsideration Requests – Macquarie Harbour Salmon Briefing to Environment Minister

[7] Note: State Party Australia's refusal to publish the final briefing material on the reconsideration of fish farming in Macquarie Harbour is currently subject to a Freedom of Information Act appeal. No outcome from investigations into potential condition breaches have been published to date.

[8] Correspondence between the Australian government and UNESCO – received under FOI

[9] Grant, M.I., Rigby, C.L. & Fernando, E. 2025. Zearaja maugeana. The IUCN Red List of Threatened Species 2025: e.T64442A124464430; https://dx.doi.org/10.2305/IUCN.UK.20252.RLTS.T64442A124464430.en

[10] Albanese tells UNESCO Maugean skate 'recovering' despite salmon farms | The Australian

[11] Moreno, D., et al (2025) 2014-2024 Macquarie Harbour Maugean skate population status and monitoring report; IMAS

a. It is biologically implausible that relative abundance increased by 425% from 2022 to 2024 given the natural rate of increase for the population is up to 8.8%.[12] The IMAS report does not claim any population trends as a "significant increase" in terms of magnitude, only that there are statistically significant differences reflected in the 'catchability' since 2022.

b. 2014 population levels reflect a heavily impacted population which had been on a steep decline since 2008.

c. Despite tentative signs of juvenile recruitment in 2022, smaller animals were not caught in 2024 suggesting recruitment may not have continued. Assuming any juveniles from 2022 survive to reproductive age, females in particular, the earliest this would be is 2026.

d. The majority of females captured in 2024 were adults nearing the end of their natural lives which is approximately 10 years old.

e. Evidence is suggestive of a population approaching a 'demographic cliff' whereby as the older population dies out, there will be a significant period of low recruitment due to very few mature reproductively active skates.

13. Our organisations are further concerned that, as confirmed by IMAS recently, skates that have hatched in captivity are all from eggs fertilised in the wild. Genetic testing to date shows the captive adult skates have not produced offspring together. That means, if the skate becomes extinct in the wild, there will be no further opportunities to collect eggs from the wild for raising in captivity and extinction would occur.[13]

14. Regarding the health of Paralungatik/Macquarie Harbour,[14] claims that dissolved oxygen is at its "highest level in more than a decade" should not be misinterpreted. Firstly, the harbour has been in its worst ever condition over this period, meaning it is a low base to measure improvement from. Dissolved oxygen levels in the World Heritage component of Macquarie Harbour are still below the target range. Scientists agree that any improvement in dissolved oxygen in parts of the harbour are most likely a consequence of the last three years of oceanic replenishment.

15. There are advised actions in the Roadmap of Agreed Actions, prepared by the National Maugean Skate Recovery Team, critical to the skate's conservation that are at least 12 months beyond their intended timeframe for completion.

    a. To our knowledge, since the inception of the Roadmap, there has neither been any investigations directed at, or methods implemented, to **reduce** biomass and/or oxygen demand of salmon in Macquarie Harbour. Farmed fish biomass production in Macquarie Harbour has not reduced since 2022, prior to the discovery of the 64% decline in the skate population.[15] The only investigations and methods implemented to address oxygen demand by salmon have been aimed at **offsetting** the drawdown via the mechanical re-oxygenation trial. The outcome of this trial has not been published to date.

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[12] Grant MI, Moreno D, Semmens J & Simpfendorfer C (2023) Population viability analysis of the Maugean skate Zearaja maugeana. Report prepared for the Australian Government Department of Climate Change, Energy, the Environment and Water, pp 40.

[13] Scientists prepare to release captive adult Maugean skates as attention turns to captive breeding - ABC News

[14] palawa kani

[15] Interim-Report-Macquarie-Harbour-Maugean-skate-population-status-and-monitoring-2021.pdf

b. Critical habitat mapping for the skate has not been finalised, although we acknowledge some progress is underway.

16. With such serious consequences at stake, the failure by governments to appropriately address pollution from this industry should be taken into account in the assessment of integration of local, regional and national planning systems (assessed as mostly effective), effectiveness of management system and governance in addressing threats outside and inside the site (some concern/mostly effective), and the overall assessment of protection and management (mostly effective).

17. Given the significant threat to and recognised value of the skate, our organisations were surprised not to find mention of the skate in values section on Criterion (ix) of the Outlook Report, in relation to the Gondwanan supercontinent or unique species. The assessment of current state and trend of values – ecological processes - acknowledges the impact on Macquarie Harbour from aquaculture (high concern and deteriorating) but does not mention Maugean skate when assessing unique diversity of ancient taxa (high concern, deteriorating).

18. Maugean Skate, *Zearaja maugeana*, are a micro-endemic, Gondwanan relict.[16] The genus Zearaja is a small group of skates whose ancestral form is thought to have occurred on the continental shelves of Gondwana in the late Mesozoic. Australia, New Zealand and South America continue to have Zearaja species that have evolved over the last 80 million years into species that are endemic to each region.

19. While the retrospective Statement of Outstanding Universal Value for the property does not name Maugean skate, it does recognise the unique diversity of ancient taxa, with ancestry dating back to the super continent of Gondwana. (Criterion (ix)).[17] It also recognises estuaries where darkened fresh water sits upon the clear, salt water of the sea, bringing closer to the surface a diverse community of marine species usually found at depth, and that this has also led to the evolution of a small suite of species that appear to be confined to this system. The skate meets all these characteristics, and its distribution is now limited to Paralungatik/Macquarie Harbour, one third of which is within the boundaries of the World Heritage Area.

20. The 2016 Tasmanian Wilderness World Heritage Area Management Plan does name Maugean skate as one of the values of the area, noting its closest relatives are found in New Zealand and Patagonia, formerly part of the supercontinent, Gondwana.[18]

Involvement of Palawa rightsholders in decision-making processes and Governance arrangements assessment

21. The Comprehensive Cultural Survey committed to in response to the 2015 RMM remains outstanding and without any substantive progress (Recommendation 13). Further, there has been no undertaking in relation to joint management with the Tasmanian Aboriginal Community (RMM Recommendation 20).

22. We do not agree that the limited progress made through Healthy Country Plans represent an appropriate level of response by the State Party and the Tasmanian Government. Healthy Country plans have not been developed with appropriate Aboriginal community representation or consultation. Further, we do **not** agree that

[16] Zearaja maugeana Last & Gledhill, 2007
[17] TWWHA - STATEMENT OF OUTSTANDING UNIVERSAL VALUE FINAL.doc
[18] DPIPWE Tasmanian Wilderness World Heritage Area Management Plan, p 47

"there is a concerted effort now in place to enhance the identification, understanding and protection of Tasmanian Aboriginal sites and values across the property".

23. We appreciate the Outlook Report's recognition that joint management does not exist in the assessment of rightsholders, including Indigenous peoples, in decision-making and therefore query the resulting assessment of "some concern" as a result. We also challenge the assessment of the current state and trend of other important values, being of "low concern" and "improving".

24. Further, the assessment of Governance arrangements as mostly effective, does not adequately reflect the commentary contained in the report which recognises that Aboriginal involvement in decision-making processes could be further strengthened. There is no shared decision making with Tasmanian Aboriginal representative bodies and no co-design or free, prior and informed consent sought for Aboriginal heritage projects or activities in the Tasmanian Wilderness, as required under the UN Declaration on Rights of Indigenous Peoples, endorsed by Australia in 2009. Further, the recognition of the role of cultural burning by the Fire Management Plan has failed to result in any cultural burning being undertaken in the Tasmanian Wilderness. There are no community led or designed cultural fire projects in development, instead the state has created its own 'cultural fire' unit that seeks to imitate cultural practices without community involvement.

25. Given the amount of time that has passed and the completely inadequate action to date, we maintain far higher levels of concern are warranted. We ask that these assessments be reconsidered in light of the above information and instead that ICOMOS, IUCN and the WHC support Palawa to achieve stronger outcomes in recognition of their rights.

26. The Palawa community seeks to meet and discuss the breach of our rights and the ongoing alienation we face as Traditional owners of the Tasmanian Wilderness.

Light pollution

27. Light pollution poses an ongoing threat to cultural heritage in the form of star knowledge. Threats include tourism development policies that actively encourage damaging commercial development, major works to dam infrastructure at the Pedder Impoundment, and the proximity of industry in boundary areas. Actively promoting natural darkness in the Tasmanian Wilderness will support retention and restoration of cultural heritage.

28. IUCN Motion 46 'Global strategy for natural darkness restoration: protecting key habitats and mitigating light pollution' passed at IUCN World Conservation Congress 2025. It encourages State Members and partner organisations to: Develop and implement national natural darkness restoration strategies that identify critical habitats, migratory routes and sensitive areas for nocturnal species and serve as a reference framework for environmental assessment procedures; and establish light pollution exclusion zones in previously identified priority areas for nocturnal biodiversity, ensuring the protection of key migration routes and habitats and incorporating light sensitivity zoning criteria to facilitate their integration into territorial and environmental planning. The Outstanding Universal Value of the Tasmanian Wilderness embodies the intent of IUCN Motion 46, but only if natural darkness becomes actively managed and protected.[19]

[19] IUCN Motion 46 https://iucncongress2025.org/assembly/motions/motion/046

Climate action – mostly effective?

29. More frequent and more intense fire regimes as a result of hotter, dryer conditions and more frequent dry lightning strikes caused by climate change are already threatening globally significant Gondwanan ecosystems within and adjacent to the Tasmanian Wilderness, many of which are dependent on the absence of fire or the presence of particular fire regimes.[20,21] There has been a significant increase in the number of dry lightning strikes, the number of fires from lightning strikes, and the extent of the burnt area in western Tasmania since 1980, with this trend projected to continue. Prior to 2000, 95% of fires were deliberately lit, however since then, lightning strikes have become the primary cause. Since 2000, fire sensitive vegetation communities that will not recover under climate change have been burned in four severe fire seasons.[22,23,24,25] These climate change driven changes to the fire regime are compounding changes to fire management practices since the Palawa were forcibly removed from the land. Frequent small burns were no longer carried out, resulting in less frequent small burns, and more extensive large fires.[26]

30. The ecosystems at likely or almost certain risk of major or catastrophic impacts from increased fire frequency and intensity driven by climate change are montane coniferous forest, coniferous heathland, and Sphagnum peatland, but all ecosystems are predicted to be measurably impacted. Increased fire frequency and intensity are predicted to kill 'much of the remaining area' of coniferous heathland and montane coniferous rainforest with catastrophic consequences for flora and fauna species.[27] This ecosystem is considered to contain the richest assemblage of taxa with evolutionary links to taxa that formed the vegetation of the ancient super continent Gondwana, including the King Billy pine (*Athrotaxis selaginoides*), Myrtle beech (*Nothofagus),* Huon Pine (*Lagarostrobos*), Pencil Pine (*A. cupressoides*), and more than 14 other genera of national or international significance.[28,29] Endemic faunal species likely to be catastrophically impacted include the Pencil Pine Moth (*Dirce aesiodora*), which is listed

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[20] Bowman, D.M.J.S.; Kolden, C.A.; Williamson, G.J. Bushfires in Tasmania, Australia: An Introduction. Fire 2022, 5, 33. https://doi.org/ 10.3390/fire5020033

[21] Styger J, Marsden-Smedley J, Kirkpatrick J (2018) Changes in Lightning Fire Incidence in the Tasmanian Wilderness World Heritage Area, 1980–2016. Fire 1: 38.

[22] Wildfire and fire management in Western Tasmania. TNPA News #32

[23] Bowman, David; Bliss, A; Bowman, CJW; Prior, Lynda (2019). Fire caused demographic attrition of the Tasmanian palaeoendemic conifer Athrotaxis cupressoides. University of Tasmania. Journal contribution. https://hdl.handle.net/102.100.100/555103

[24] Bowman, David; Rodriguez-Cubillo, D; Prior, Lynda (2021). The 2016 Tasmanian Wilderness Fires: Fire Regime Shifts and Climate Change in a Gondwanan Biogeographic Refugium. University of Tasmania. Chapter. https://hdl.handle.net/102.100.100/533424

[25] Blakers, R (2025). Paleoendemics and Fire, Wild Island Tasmania, Hobart.

[26] Bowman, David; Terry, Ian; Lehman, Greg; Williamson, Grant J (2025). Fire regime change in western Tasmania between 1830 and 2025. University of Tasmania. Journal contribution. https://hdl.handle.net/102.100.100/711829

[27] Mallick, S. 2013. Tasmanian Government Department of Primary Industries, Parks, Water and Environment. Potential Impacts of Climate Change on the Fauna Values of the Tasmanian Wilderness World Heritage Area, Nature Conservation Report 13/2.

[28] Fitzgerald, N. (2011) Establishment Report for Tasmanian Wilderness World Heritage Area Climate Change Monitoring Program: Montane Conifers. Resource Management and Conservation Division, DPIPWE, Hobart, Nature Conservation Report Series 11/06.

[29] Balmer J., Whinam J., Kelman J., Kirkpatrick J.B. & Lazarus E. (2004) A review of the floristic values of the Tasmanian Wilderness World Heritage Area. Nature Conservation Report 2004/3. Department of Primary Industries Water and Environment, Tasmania, Australia

as one of the most primitive faunal taxa with links to fauna more ancient than Gondwana.

31. Given the Australian Government's continued commitment to approving new fossil fuel projects and the Tasmanian Government's refusal to implement sector based emissions reduction targets, we cannot understand the assessment of 'mostly effective' to this management response. As evidenced by the severity and irreversible loss of fire-sensitive palaeoendemic vegetation communities in four fire seasons since 2000, fire management strategies in the TWWHA are currently unable to protect key world heritage wilderness values and the task will continue to become more challenging. In the 2019 fires, 95,000 hectares of the TWWHA burned including rainforest and alpine vegetation communities, and some of the tallest trees in the world.[30] In February 2025, preliminary analysis suggests over 19,000 hectares of fire sensitive vegetation burned including 10,419 hectares of temperate rainforest and 462 hectares of alpine vegetation.[31] In the scientific community, the following priorities, alongside emissions reduction, are recognised as necessary to improve protection of the fire sensitive vegetation communities in the TWWHA: (i) Investment in rigorous science to evaluate the effectiveness of both direct firefighting approaches and prescribed burning - the evidence base is currently inadequate; (ii) identification and prioritisation of at-risk ecosystems; (iii) evaluation of the trade-offs between ecological impacts of firefighting strategies (use of chemicals, cutting of fire trails) and the impacts of fire; (iv) Involvement of non-government stakeholders and a whole of community approach to managing fire.[32]

32. The current Australian Government has approved 32 new coal, oil and gas developments since they were elected in 2022.[33] These projects are expected to exceed 6.5 billion tonnes of CO_2-e pollution over their lifetime, directly and from combustion of the coal and gas they produce. That's equivalent to about one-eighth of global annual emissions or about 15 years of Australia's current emissions. There are many more such projects currently seeking approval. Recent changes to the EPBC Act failed to include an explicit requirement to assess climate impacts from projects.

33. Tasmania is one of the most rapidly warming marine regions globally, with ocean warming rates about four times higher than the global average.[34] While the west coast is warming at a slower rate than the east, impacts of increasing temperatures are already evident. Increased water temperatures have already contributed to significant mortality events in Macquarie Harbour, including that of the Maugean skate in 2019.[35] There has been no management response to address the impacts of climate change in Macquarie Harbour, or along coastlines adjacent to the property.

Environmental Impact Assessment

[30] Keating, A. Handmer, J. The southwest Tasmania fires of summer 2018-2019 - a post event review capability study. 64 (Zurich, 2021).
[31] Bowman, D. More dry lightning in Tasmania is sparking bushfires – challenging fire fighters and land managers. 19/02/2025.
[32] Wildfire and fire management in Western Tasmania. TNPA News #32
[33] The Albanese Government's fossil fuel approvals | Climate Council
[34] Lough JM, Hobday AJ (2011) Observed climate change in Australian marine and freshwater environments. *Mar Freshwater Res* 62: 984.
[35] Conservation Advice for Zearaja maugeana (Maugean skate), p.22

34. Fish farming has been inadequately assessed for impacts on World Heritage.[36] Indeed, salmon farming in Tasmania has never been subject to an Environmental Impact Assessment (EIA) under Australian law. This was recently reported to the 80th Session of the UN General Assembly in the Report of the Special Rapporteur on the human right to a clean, healthy and sustainable environment.[37]

35. The UN Report clarifies States obligations for environmental impact assessments and highlights essential improvements to evaluate impacts effectively and comprehensively. The report states:

> "In Tasmania, Australia, since 2012 industrial salmon farms have proliferated without any environmental impact assessments being conducted, threatening endemic species, such as the Maugean skate."

36. The 44th session of the World Heritage Committee reiterated to Australia the importance of carrying out impact assessments, and urged submission to the Committee, for review by the Advisory Bodies, details of any project that may affect the site's Outstanding Universal Value, in accordance with Paragraph 172 of the Operational Guidelines.[38] In the case of fish farming adjacent to the Tasmanian Wilderness, no such assessment has been undertaken.

Effectiveness of the legal framework undermined

37. The Outlook Report's assessment of the legal framework as "mostly effective" relies on the EPBC Act requiring any proposal which could threaten the Outstanding Universal Value of the site to be subject to statutory EIA. We now know this is not the case.

38. Requests for reconsideration of the 2012 decision that allowed expanded fish farming in Macquarie Harbour should have led to such an EIA.[39] The original decision was found not to be a controlled action (with conditions) and therefore did not require impact assessment under Australian law. However, new scientific evidence of significant impacts triggered the review. Preliminary Australian Government advice (obtained via a Freedom of Information Act under appeal) was that the review was likely to recommend the decision be changed to a controlled action, thus requiring EIA.[40] The release of final advice has also been refused and is currently subject to another Freedom of Information Act appeal.

39. As per our correspondence of 17 April 2025, in March 2025, rather than allowing the reconsideration to be finalised, the Australian Government instead changed the law, weakening protections and restricting the availability of these sorts of reviews in Australia's *Environment Protection and Biodiversity Conservation (EPBC) Act 1999*.[41] Australia's Environment Minister subsequently decided the new provision

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[36] Bombshell FOI reveals fish farms have been inadequately assessed for impact on threatened species and World Heritage

[37] UNGA report of the Special Rapporteur on the human right to a clean, healthy and sustainable environment, p.5.

[38] Decision 44 COM 7B.75, adopted during the extended 44th session of the World Heritage Committee (WHC/21/44.COM/18)

[39] Save the Skate - Reconsideration of Marine Farming Expansion, Macquarie Harbour, Tasmania

[40] Bombshell FOI reveals fish farms have been inadequately assessed for impact on threatened species and World Heritage

[41] Letter_Tasmanian-Wilderness-World-Heritage-Area-and-Maugean-skate_April-2025-final.pdf

applied and that he could no longer change the 2012 decision.[42] This decision is now being challenged in Australia's federal court by civil society organisation, NWTas for Clean Oceans Inc.[43]

40. In the 2023 update to the State of Conservation Report, Australia committed to strong legislative protection.[44] The reality is the Australian Government has done the opposite – certainly in relation to World Heritage. State Party Australia could have allowed the law to do its job and protect the skate, by allowing the reconsideration process to be completed, but they chose to change the law and protect the salmon industry instead.

41. Recent changes to Australian nature laws do not address this change. The newly established Environment Protection Agency provides capacity for greater oversight, but recent government actions indicate there is no political will to do so. Further, we are yet to see whether it will be adequately resourced to deliver effective independent compliance and enforcement action. Any new protections provided to World Heritage areas and threatened species are subject to significant Ministerial discretion, with uncertainty as to how new environmental standards may apply to increase protections.

42. Further, when it comes to law enforcement (assessed as "mostly effective"), we are concerned that the conditions attached to the original 2012 approval are not being met. Civil society groups have brought this to the attention of the Australian Government to no avail.

Boundary management and invasive species

43. We appreciate the Outlook Report's assessment that the effectiveness of management systems and governance arrangements in addressing threats outside the site is of some concern and query that the management of boundaries is considered mostly effective. Especially concerning is the ongoing clear-fell logging occurring right up to the boundary of the Tasmanian Wilderness. Logging operations, road construction and burning of logged areas directly threaten pristine, old-growth forests in areas on the eastern and northern boundaries. Critical areas of Outstanding Universal Value have not been included in the World Heritage area due to pressure from resource-extractive industries. The loss of these areas due to commercial forestry activities will continue to negatively impact on the wilderness value and integrity of the Tasmanian Wilderness. Forestry activities also compromise options for future extensions. We call for comprehensive and independent assessment of the direct and indirect impacts on the Tasmanian Wilderness due to ongoing logging on boundaries.

44. As the Outlook Report notes, the increased spread of damage from feral deer due to the porous nature of the boundary, and the lack of resources to manage the wild population across multiple tenures, means that some Outstanding Universal Value are under increased threat.

45. The 2015 RMM also highlighted biosecurity as a major concern and management priority. However, the actions of State Party and subnational entities on biosecurity,

[42] Commonwealth reaffirms decision to allow salmon farming expansion in Tasmania's Macquarie Harbour - ABC News

[43] Local group sues Environment Minister Murray Watt in test case over decision giving green light to Maugean skate extinction

[44] Update to the State Party Report on the state of conservation of the Tasmanian Wilderness World Heritage Area (Australia) – 2023

especially feral deer, remain inadequate in relation to the extent and severity of the impacts on Outstanding Universal Value.

46. As correspondence of May 2023 to the World Heritage Centre highlighted, as long as invasive deer remain protected in the adjacent region and without a long-term commitment of adequate resourcing, Australia will fail to meet its obligations to protect the site.[45] 2015 RMM recommendations 18 and 19 remain outstanding.

47. The most recent State Party Report on the State of Conservation of the Tasmanian Wilderness (2022) and the subsequent update (2023) makes no mention of invasive deer, invasive species, or biosecurity, despite the increasing threat these issues pose to the Outstanding Universal Value of the property, especially in the face of climate change.

Other management response assessments

48. We appreciate the Outlook Report's recognition that there is a high threat associated with tourism infrastructure. In July 2021, UNESCO urged the Tasmanian Government "to avoid any development at the [TWWHA] before the detailed plan for a comprehensive cultural assessment is implemented".[46] The comprehensive cultural assessment is yet to be implemented, however the Tasmanian State Government's expression of interest policy which promotes development in the Tasmanian Wilderness persists. There continues to be significant threats from private tourist developments like impact on Outstanding Universal Value, radically increased helicopter access and rezoning of wilderness to recreation zones. There are dozens of proposed developments in the Tasmanian Wilderness still in the government pipeline, with particular threats to the South Coast Track and Lake Malbena, where a legal challenge from The Wilderness Society is ongoing.

49. In March 2025, Macquarie Harbour was globally recognised as a Key Biodiversity Area (KBA), triggering KBA status under criteria A1a, A1e and B1 as defined by the IUCN's *A global standard for the identification of Key Biodiversity Areas: version 1.0*.[47] The KBA assessment notes that "Salmon farming is currently the most significant threat to Macquarie Harbour, in particular organic matter pollution from the farms and the associated reduction in dissolved oxygen concentrations."[48] The Outlook Report's assessment of overlapping international designations does **not** acknowledge this recent development.

Summary

50. Our key concerns can be summarised as primarily relating to misleading information provided by the Australian Government in relation to the recovery of Maugean skate, the complete lack of meaningful progress on assessment and protection of cultural values or the return of any aspect of management to the Tasmanian Aboriginal Community. The absence of environmental impact assessment for fish farming adjacent to the property,

[45] Letter to UNESCO-TWWHA.docx
[46] Tasmanian government and UNESCO seemingly at odds over national park development: Greens, ABC Article, August 2022
[47] IUCN (2016) A Global Standard for the Identification of Key Biodiversity Areas: Version 1.0. https://portals.iucn.org/library/node/46259
[48] Key Biodiversity Areas: Macquarie Harbour, Australia; https://www.keybiodiversityareas.org/site/factsheet/201494

and the undermining of the legal framework with removal of avenues for recourse where threats to heritage are found to occur also seriously concern us.

51. These actions are not consistent with Articles 4 and 5 of the World Heritage Convention.

52. The current suite of threats to the Tasmanian Wilderness, compared to conditions at the time of inscription as World Heritage in 1982, show a significant level of concern is warranted.

53. We have provided additional information relevant to threat levels and management responses assessed by the 4th Global World Heritage Outlook Report that we argue should warrant higher levels of concern in relation to assessments of:

- Water-borne & other effluent pollution
- Involvement of stakeholders and rightsholders, including Indigenous peoples and local communities, in decision-making processes
- Legal framework and law enforcement
- Governance arrangements, including integration into local, regional and national planning systems
- Climate action
- Boundaries
- Management plan and overall management system, and
- Implementation of World Heritage Committee decisions and recommendations.

Requests

54. We respectfully request that you reconsider the IUCN Outlook Report's overall assessment of "good with some concern." Given the additional information above, we propose an overall rating of "significant concern" would be more appropriate.

55. We further request the WHC and its advisory bodies to remind the State Party of its obligations under the World Heritage Convention to prioritise action to address threats, both within and adjacent to the Tasmanian Wilderness, and complete environmental impact assessments on all actions that threaten the heritage values of the property, namely finfish farming in Macquarie Harbour.

56. To this end, we ask that the IUCN, ICOMOS and UNESCO jointly recommend to the World Heritage Committee, for consideration at its 48th session:

    i. A requirement for regular State of Conservation Reports from State Party Australia are to recommence; and

    ii. A Reactive Monitoring Mission is sent to the Tasmanian Wilderness in the second half of 2026 to:

        a. meet with Tasmanian Aboriginal Community representatives to gain a direct understanding of their rights and aspirations;

        b. examine the impact of marine farming operations in Macquarie Harbour on its Outstanding Universal Value;

        c. examine other threats to the property's Outstanding Universal Value, including in relation to recommendations from the 2015 RMM that remain incomplete; and

        d. any other relevant matters.

On behalf of the above organisations, yours sincerely,



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