

Resource Planning and Development Commission

*Report on the Mole Creek
Karst National Park
and Conservation Area
Draft Management Plan 2001*



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T A S M A N I A

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2001

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Resource Planning and Development Commission

The Resource Planning and Development Commission is established by the *Resource Planning and Development Commission Act 1997*.

The Commission has five principal functions:

- to assess and approve local government planning schemes and planning scheme amendments;
- to assess projects of State significance;
- to assess draft State Policies;
- to prepare the Tasmanian State of the Environment Report; and
- to conduct inquiries into the use of public land.

The Commission is part of the State's resource management and planning system, the objectives of which are set out in Schedule 1 of the *Resource Planning and Development Commission Act 1997*.

The Commission is made up of:

- an Executive Commissioner (Julian Green)
- a Commissioner with planning experience nominated by the Local Government Association of Tasmania (Geoff Davis)
- a Commissioner with expertise and management experience in resource conservation (Bruce Davis)
- a Commissioner with planning experience and experience in industry and commerce (Andrew Edwards)
- a Commissioner with resource conservation or planning experience representing community interests (Lia Morris)
- a Commissioner with public administration experience in regard to project implementation (Jeffrey Gilmore)



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Glossary and acronyms

ASF	Australian Speleological Federation
Commission	Resource Planning and Development Commission
Director	Director of National Parks and Wildlife
DIER	Department of Infrastructure, Energy and Resources
DPIWE	Department of Primary Industries, Water and Environment
Draft Plan	Mole Creek Karst National Park and Conservation Area Draft Management Plan 2001
EIS	Environmental Impact Statement
LUPA Act	<i>Land Use Planning and Approvals Act 1993</i>
NPWAC	National Parks and Wildlife Advisory Council
NPW Act	<i>National Parks and Wildlife Act 1970</i>
PWS	Parks and Wildlife Service, Department of Primary Industries, Water and Environment
Park	Mole Creek Karst National Park and Conservation Area
TALC	Tasmanian Aboriginal Land Council
RFA	Regional Forest Agreement
WHA	Tasmanian Wilderness World Heritage Area

1.0 Introduction

1.1 Ministerial direction to the Commission

On 26 November 2001 the former Minister for Primary Industries, Water and Environment, the Hon. D Llewellyn directed the Resource Planning and Development Commission (the Commission) to review the representations and the report of the Director of National Parks and Wildlife (the Director) made on the Mole Creek Karst National Park and Conservation Area Draft Management Plan 2001 (the Draft Plan).

1.2 Background to the Draft Plan

The Draft Plan provides for the management of the Mole Creek Karst National Park and Conservation Area (the Park), for the next 10 years. The aim is to provide management direction and to guide development based on a set of defined objectives. The Draft Plan provides a vision for the Park to be achieved through the implementation of specific management objectives, policies and actions.

1.2.1 Preparation of the Draft Plan by DPIWE

The Draft Plan was prepared by the Department of Primary Industries Water and Environment (DPIWE) in accordance with the requirements of Part IV of the *National Parks and Wildlife Act 1970* (NPW Act).

1.2.2 Public exhibition of the Draft Plan by DPIWE

The Draft Plan was made available for public comment from 12 May 2001 to 16 July 2001 by DPIWE. Thirty-three representations were received during the public exhibition period. The list of representors is included in Appendix 1.

1.2.3 Director's report

Under section 20A of the NPW Act, the Director is required to forward to the Commission, a copy of all representations made in relation to the Draft Plan, and a report containing:

“(i) a summary of the representations; and

(ii) the Director's opinion on the merits of the representations including whether or not he or she believes the representations to be of sufficient merit to warrant modification of the management plan; and

(iii) a summary of any proposed modification to the management plan; and

(iv) any additional information the Director considers relevant.”

The Director provided this information to the Commission on 29 October 2001. The documents are included in Appendix 2.

1.3 Review process by the Commission

The review process was conducted in accordance with Part IV, sections 20B–20D of the *National Parks and Wildlife Act 1970* (NPW Act).

The Commission made the representations and the Director's report available for public inspection at the Commission's offices in Hobart and Launceston and the Deloraine Library. The representations and report were exhibited for a period of one month from 17 December 2001.

1.3.1 Hearing

Section 20B(3) of the NPW Act provides that a hearing may be held at the Commission's discretion to assist in the review process. The Commission determined at its meeting on 29 January 2002 to hold a hearing and advised the Minister accordingly.

The Commission delegated its powers and functions in respect of the hearing to Mr Robin Nolan.

The hearing was held at the Community Complex, Deloraine on 6 June 2002. The hearing was conducted in accordance with sections 10, 11 and 12 of the *Resource Planning and Development Commission Act 1997*. Appendix 3 contains a list of people who made a submission at the hearing.

1.3.2 Commission reports to the Minister

A copy of this report has been provided to the Minister for Tourism, Parks, Heritage and the Arts. The Minister must consider the report of the Commission before the Draft Plan is submitted to the Governor for approval under s.19 of the NPW Act. Section 20E(3) of the NPW Act provides that a management plan submitted to the Governor can either be unaltered or contain alterations that the Minister thinks appropriate having regard to the Commission's report, the representations (including any representations from the National Parks and Wildlife Advisory Council (NPWAC)) and the Director's report.

2.0 Review of representations and Director's report

2.1 Overview

The Commission has considered all representations made in relation to the Draft Plan and has based its conclusions and recommendations upon these representations, evidence presented at the hearing and the Director's report.

The principal issues identified by representors were:

- the deficiencies of the Draft Plan;
- nature of the Park;
- relationship with neighbouring landowners; and
- relationship with cavers and caving issues.

Other issues raised by representors included:

- flora and fauna;
- World Heritage and development assessment processes;
- Aboriginal heritage;
- Visitor Services Zones; and
- signage and promotion.

These issues are reviewed in sections 2.2 – 2.10.

Whilst the Commission recognises that many of the concerns expressed in the representations are external to the area of the Park and therefore to the Draft Plan, it also recognises that these broader issues are critical to effective and sustainable management of the Park. It is therefore desirable that these issues are addressed, either in the Draft Plan itself or through separate mechanisms and processes running concurrently with the Draft Plan. Although the Draft Plan mentions these broader mechanisms in section 1, representors were not satisfied that issues of broader concern would be addressed.

The Commission does not support withdrawal of the Draft Plan (as promoted by a number of representors) as it does not consider that this will assist in addressing the concerns of representors. However, the Commission considers that the matters raised are of significance and that alterations to the Draft Plan are required. This report concentrates principally on the major issues raised on to the Draft Plan instead of clause by clause alterations. Although alterations to clauses are required these should be made consequential upon the resolution of the major issues.

2.2 The deficiencies of the Draft Plan

Representations

Representors principally argued that the Draft Plan was deficient and should be recast in a more coherent and competent manner, followed by another round of public consultation. Representors considered the Draft Plan to be poorly organised and lacking the necessary detail to determine future management provisions for significant features such as individual caves. It was one representor's view that the Draft Plan did not grasp the concept of karst as a system, nor did it display any capacity to convey this concept to the broader community.

The Draft Plan was also criticised for overemphasising visitor services and economic development.

Director's response

The Director advised that:

“The criticisms of the plan structure relate more to presentation than to substance. There is scope for making the final plan clearer, particularly to better link the context (both physical and management) to the proposed actions. This would address many of the criticisms of apparent lack of justification for particular proposals.

Two options deserve consideration:

- *The plan could be subject to a total rewrite and re-advertisement for public comment, or;*
- *The plan could be edited to address the major criticisms by, for example, more extensive cross-referencing and indexing.*

The PWS considers that further public comment is not warranted and recommends the second option.”

Commission's commentary

The view of the Director that the criticisms of the Draft Plan's structure relate more to presentation than to substance is not accepted. Issues of both substance and presentation have been raised in the representations. Editing, cross-referencing and indexing, as proposed by the Director, will not resolve all of the issues of greater concern to representors.

The Commission does not support the Director's first option that the Draft Plan be subject to a total rewrite and re-advertised for public comment. Further public consultation is unlikely to resolve all the matters of concern to representors, as many of these concerns relate to issues that are external to the Draft Plan. In addition, the consultation process involved in the development of the Draft Plan has resulted in a situation where stakeholders do not support, nor have ownership of, the Draft Plan.

Due to the unusual nature of the Park (see section 2.3 below) the support of stakeholders, particularly neighbours, is critical in ensuring that the values of the Park are sustained. Addressing the concerns of representors requires long-term co-operation and participation from all parties. A co-operative process should be established in an attempt to resolve the issues of broader concern to representors, particularly those external to the Draft Plan. Park neighbours, cavers, user groups, the Aboriginal community and other stakeholders should be involved in a meaningful manner in this process.

Whilst withdrawal of the Draft Plan as promoted by a number of representors is not supported, the Commission considers that alterations to the Draft Plan are required.

2.3 Nature of the Park

The Park comprises eleven widespread and separate blocks covering over 1,345 hectares, generally south and west of the Mole Creek Township. The Park includes the Sassafras Cave blocks, Cow Cave block, Croesus Cave block, King Solomons Cave block, Marakoopa Cave block, Kubla Khan Cave block, Sensation Gorge block, Wet Cave block and Westmorland Falls block and the adjoining conservation area.

The Park blocks are bounded by State forest, conservation area, State reserve, unallocated Crown land and private land. The separate parts of the Park are named as cave blocks with the Marakoopa Cave block within the Tasmanian Wilderness World Heritage Area. This block, and other smaller blocks, borders the Great Western Tiers Conservation Area. The Central Plateau Conservation Area and other blocks have a common boundary with forest reserves. Section 1 of the Draft Plan describes the creation of, and composition of, the Park.

2.3.1 Composition of the Park

Representations

Both caving interests and adjoining landowners were critical of the creation of the area as a national park. They were particularly concerned with the level of public consultation involved in the Park's creation. It was argued that boundary considerations and conflicts of use across boundaries were not resolved or discussed before the Park was declared.

It was argued that the nature of the Park had resulted in a Draft Plan that ignores the greatest threats to the karst and caves - agriculture, forestry and mining.

The National Parks and Wildlife Advisory Council (NPWAC) (Representation 33) stated that the Draft Plan was lacking necessary contextual information regarding the Park which:

- *“acknowledges that the park captures only parts of the karst system that it is reserved to protect;*
- *Acknowledges the real context of the park as a series of blocks within a larger karst landscape; and*
- *Clearly describes the different land tenures over the karst systems, which is complex and supports the discussion of cross tenure management needs (should be produced in map form).”*

Director's response

The Director acknowledged that the Park presents unusual management problems and that many of the values for which the Park was reserved lie underground and extend under adjoining land tenures. It was acknowledged that the major threats to the values of the area come from outside the reserved blocks.

The Director did not respond to matters concerning declaration of the Park.

Commission's commentary

The Park is unusual and therefore difficult to manage for a number of reasons:

- the separate blocks which comprise the Park are disjointed and small in area;
- the values for which the Park was established mainly lie underground;
- karst features can be fragile;
- the Park has lengthy boundaries for the area reserved;
- the Park has a large number of neighbours;

- the karst system for which the Park was created only partially lies within the reserved lands (cave entrances may be in the National Park yet their exits are on private land and vice versa); and
- the majority of the karst system and its catchment is not within the Park and lies in State forest, private land or unallocated Crown land.

The Commission accepts the submissions of representors who argued that the reserved land on its own is not of a sufficient size or design for long-term protection of the karst system. If the values of the Park are to be preserved, it is critical that effective mechanisms are developed for improving the relationship between the managers of the Park and surrounding landowners.

The Commission considers that the Draft Plan does not clearly provide the context of the Park, as a series of disjointed small reserves within a larger karst landscape. Subsequent management prescriptions, policies and discussion lack sufficient detail to reflect this context. The Commission considers this context essential to effective future management of the Park and recommends that it be acknowledged in section 1.2 and in subsequent management prescriptions. The Commission also considers that the context of the Park be shown geographically through broad land tenure categories on a map. The map should be included in section 1 of the Draft Plan.

The complex series of blocks that comprise the Park provide a different set of management challenges to those in the majority of other parks. The Park is in the midst of a farming community with competing interests on land use, access to water and differing values of residents and visitors. This complexity adds to the significance of the Park.

Issues regarding the declaration of the Park are beyond the scope of the Draft Plan and this review.

Recommendation 1

Alter sections 1, 3, 5, 6, 7, and 8.1 of the Draft Plan, particularly the management prescriptions, to clearly present the context of the Park - as a disjointed, non-contiguous reserve with the majority of the karst system outside the Park.

Recommendation 2

Alter references to the Mole Creek Karst National Park and Conservation Area which state that it protects an internationally significant karst system, to make it clear that the Park encompasses a relatively small part of the entire karst system of Mole Creek.

Recommendation 3

Insert a map showing the surrounding land tenure of the Park, in section 1 of the Draft Plan.

2.3.2 Extensions of the Park boundaries

Representations

A significant number of representations advocated extensions to the Park boundaries to incorporate the catchment of the karst system. It was suggested that priority should be given to gaining public control over agricultural land and forest areas overlaying karst through land acquisition or tenure reassignment.

Representations identified State forest and conservation areas as significant to the Park, particularly in terms of protecting the catchment of the karst system.

Forestry Tasmania (Representation 3) was concerned with the Draft Plan's discussion regarding land tenure. Forestry Tasmania submitted that it is *"inappropriate and beyond the brief of the plan to make specific land tenure recommendations outside the area covered by the Plan."*

The Department of Infrastructure, Energy and Resources (DIER) (Representation 4) provided a similar argument, stating that land use divisions were a matter for State Government and Parliament, and not a matter for a management plan.

The matter of cross tenure management was the main focus of the NPWAC submission (Representation 33). It was contended that there was little detail in the Draft Plan on how cross tenure management was to be achieved. The NPWAC stated there were no cross-tenure management agreements in place or any interim management provisions. The NPWAC submitted that detailed analysis of land acquisition needed to be incorporated into the plan, along with timelines for the development of cross tenure management agreements.

Director's response

The Director considered it to be beyond the scope of a national park management plan to make recommendations on boundary extensions to the Park. The Director stated:

"Since this is a management plan for a National Park, prepared under the National Parks and Wildlife Act 1970, it is very limited in the recommendations which it can make for actions beyond the boundaries of the blocks which comprise the national park. This is a major role of the Mole Creek Integrated Catchment Management Strategy which is currently being prepared. The final plan should explain the relationship of this document with the plan and make it clear that this is the main document in which the off-reserve management issues are to be resolved."

The Director recommended that the management plan should be reviewed in five years or when any major land tenure changes occur. The planning area for the review would include the relevant part of the Great Western Tiers Conservation Area and any other reserves that include the karst catchment.

Commission's commentary

As stated by the Director the NPW Act sets out the matters to be addressed in a management plan. Most impacts upon underground karst systems arise from surface activity on land outside the Park. However, a management plan does not have the statutory power to determine management prescriptions for such land. This restriction does not prevent the Draft Plan from identifying the objectives of cross tenure management, the policies that support the objectives and actions required. In this instance, the objective is to obtain the cooperation and support of adjoining landowners. Section 7.2 of the Draft Plan discusses, albeit briefly, the issue of cross tenure land management. Schedules 3 and 4 of the NPW Act are relevant to this issue. They state:

“Schedule 3 (values of land)

(National Park) *A large natural area of land containing a representative or outstanding sample of major natural regions, features or scenery.*

Schedule 4 (objectives of management)

(g) to protect the national park against, and rehabilitate the national park following, adverse impacts such as those of fire, introduced species, diseases and soil erosion on the national park's natural and cultural values and on assets within and adjacent to the national park;”

Based upon the current boundaries, the ability of PWS to satisfy Schedule 4 of the NPW Act in the long-term is limited, particularly considering that the majority of the karst system, including cave entrances and exits, are outside the Park.

The Director's response recommending that the management plan should be reviewed in five years, or when major land tenure changes occur, and that the review include the relevant part of the Great Western Tiers Conservation Area is supported. As part of this review the boundaries of the Park should be considered through an appropriate consultation process. There should be verification that at least the adjoining conservation areas have separate management plans that aim to protect the karst system.

Whilst the current boundaries are far from ideal in terms of protecting the entire karst system, adjoining land use and ownership will continue to provide a potential for conflict that needs to be managed, irrespective of where the boundaries fall.

Recommendation 4

Alter section 8.7 of the Draft Plan to provide for the review of the Management Plan in five years or when any major land tenure changes occur. The planning area for the review should include the relevant part of the Great Western Tiers Conservation Area and any other reserves that include part of the karst catchment.

Recommendation 5

Alter section 7.2 to provide greater detail on how the PWS will work with neighbours in the future to improve cross tenure land management.

2.3.3 The Joint Management Protocol

The Mill Creek-Kansas Creek catchment has its headwaters in State forest, provides the streamflow through Lynds and Croesus Caves and is currently managed under a Joint Management Protocol between DPIWE and Forestry Tasmania. The preamble to the Joint Management Protocol states:

“It is envisaged that the protocol will further management objectives for the Mole Creek Karst National Park as set out in the Mole Creek Karst Management Plan, and for State forest as set out in the Mersey District Forest Management Plan. The agencies recognise that the protection of the karst system is best approached through a collaborative approach to management.”

Representations

A number of representors submitted that the Joint Management Protocol was inadequate and did not provide protection against some of the greatest potential threats to the karst, such as limestone mining.

Forestry Tasmania (Representation 3) stated that although the Draft Plan goes into great detail about the Mill-Creek-Kansas Creek catchment and makes recommendations regarding land tenure, the area is outside the Park and it is inappropriate for the Draft Plan to make these specific recommendations.

The NPWAC (Representation 33) considered that the priority for future management should be the inclusion of the full Croesus catchment and the Conservation Area within the Park. The NPWAC was also concerned with current zoning of forest within the Mill Creek-Kansas Creek catchment as conditional. Conditional forest they stated, *“does not inspire confidence for the long-term protection of this catchment and karst system.”*

Director’s response

The Director proposed that the policy recommendation in section 6.3 of the Draft Plan for the formal reservation of the Mill Creek-Kansas Creek catchment be modified to an acknowledgment of the significance of this area. The Director stated that:

“This protection would not necessarily be by formal reservation, for example conservation covenants or other management agreements could be suitable.”

The Director also wished it to be noted that:

“karst was not a value considered in the RFA process and DPIWE, in conjunction with DIER, has a program of identifying priority land for potential protection of karst values.”

Commission’s commentary

At issue with the representors is the portion of State forest classified as conditional forest under the Mersey District Forest Management Plan. Conditional forest as stated in section 6.3 of the Draft Plan are forests that have special circumstances, in this case karst values. Management options for conditional forests require further investigation before a decision can be made as to whether the area in part or in whole, should be managed in the longer term as part of either the Production or Protection zones.

The Draft Plan however states that the Mill Creek-Kansas Creek catchment warrants a more secure context for management than conditional forest status, because:

“This catchment contains some of Australia’s most outstanding caves. Their significance for conservation is well established and is deserving of the highest level of protective management. The joint protocol is primarily concerned with day to day management issues and does not address zoning or tenure. Given the significance and sensitivity of Croesus Cave and Lynds Cave, the Department considers the Mill Creek-Kansas Creek catchment warrants a more secure context for management than conditional forest status.”

The relevant policy in section 6.3 of the Draft Plan (Croesus Cave block) on the protocol states:

“Notwithstanding the joint protocol, the department recommends that the Mill Creek-Kansas Creek catchment be formally protected in order to ensure protection of karst values.”

The importance of the catchment to the Croesus Cave system is recognised and reflected in the management approaches of Forestry Tasmania and PWS. It is for these two instrumentalities to give effect to the Joint Management Protocol or, if found wanting, to upgrade that protocol. The Draft Plan infers that the status of the State forest as conditional forest is not sufficiently secure. Any change to conditional forest classification would require a formal amendment to the Mersey District Forest Management Plan. In any event it would seem unlikely that wood production would be allowed in the area under the Forest Practices Code, due to the location of, and possible impacts upon, the karst. The Commission recommends that a plan showing the area of the Joint Management Protocol for the Mill Creek-Kansas Creek Catchment would assist in future management of the Park and should be included within section 6.3 of the Draft Plan.

In order to address the significant concerns of representors the Commission suggests that the PWS negotiate with Forestry Tasmania with a view to the creation of a forest reserve (under s.20 of the *Forestry Act 1920*) for the Mill Creek-Kansas Creek

catchment and with a view to the management of such a reserve under a future revised Plan according to s.19 (1B) of the NPW Act.

Recommendation 6

PWS and Forestry Tasmania to investigate the creation of a forest reserve for the Mill Creek-Kansas Creek catchment (under s.20 of the *Forestry Act 1920*) to be managed according to s.19 (1B) of the NPW Act.

Recommendation 7

Alter section 6.3 of the Draft Plan to include a map of the area covered by the Mill Creek-Kansas Creek Joint Management Protocol.

2.3.4 Underground national park

Representations

Jeff Butt (Representation 7) advocated that the Park should include the whole underground part of the karst system as an underground national park.

Director's response

The Director did not respond to the issue of the establishment of an underground national park.

Commission commentary

The merit or otherwise of establishing an underground national park has not been pursued, but the following is to be observed:

- most impacts on underground karst systems arise from surface activity;
- some surrounding land titles extend to the centre of the earth; and
- the karst systems that comprise the national park are not contiguous.

The establishment of an underground national park is not considered a necessary option for improving management of the karst system. Although there is nothing preventing the establishment of an underground national park (since Crown land extends to the centre of the earth), the major challenges for management are unlikely to be overcome or reduced by calling the national park 'underground.'

2.3.5 Access to karst

Representations

Representors were concerned that there was no legal access to some blocks as the surrounding land was currently in private or other ownership.

Debbie Hunter (Representation 10) stated that access to Sassafras Cave was problematic as the reserved road does not connect to the Sassafras Cave block and access is across private land.

Other representations were concerned that there was no defined access route to Cyclops Cave and that visitors must travel through unallocated Crown land.

Director's response

The Director agreed that there was a need to clarify existence or otherwise of public access to Baldocks, Cyclops and Sassafras Caves.

Commission's commentary

In relation to the Sassafras Creek blocks section 6.1 of the Draft Plan states that:

“the legal status of access to this block is uncertain, as there is apparently no provision for public access across the private land which totally surrounds it. Moreover, there does not appear to be continuous public access across the uncommitted Crown land to the Baldocks Cave block or to the Cyclops Cave block from the end of the South Mole Creek Road.”

The relevant action dot point within the Draft Plan states:

“Pursue options for securing legal public access if this is currently unavailable.”

Access to Baldocks and Cyclops Cave blocks is via roads reserved under the *Crown Lands Act 1976*. However, the Sassafras Creek Cave block does not have legal public access as the reserved road does not connect with the block.

Section 47 (1) of the *Crown Lands Act 1976* states that:

“No person shall wilfully obstruct any track or reserved road on any Crown land, such track or road not being under the care, control, and management of any municipal council, so as to prevent the free passage of any person, carriage or other vehicle, or stock.”

Under the *Crown Lands Act 1976* road reserves are designed to provide access across or through land, be it in private ownership or otherwise. The Commission, therefore, does not consider that the legal status of access along this road reserve is in question. However, as the road reserve does not connect to the Sassafras Cave block, there is currently no legal public access to this reserve. Since this block is part of a national

park, it is appropriate that public access be provided. The Commission therefore recommends that options for securing legal public access to this block be pursued.

Recommendation 8

Omit action dot point 4 from section 6.1 of the Draft Plan and substitute:

Pursue options for securing legal public access to the Sassafras Cave block.

Recommendation 9

Alter the text in section 6.1 to confirm that road reserves provide lawful access.

2.4 Relationship with neighbouring landowners

Representations

Representations confirm that there is distrust between neighbouring landowners and the Park's managers (the PWS). Representations from neighbouring landowners were critical of the process involved in the development of the Draft Plan, particularly the consultation phase. These representations identified that the Draft Plan mentioned involvement and cooperation with neighbours on numerous occasions, but to date this had not occurred.

Sally Martin (Representation 30) argued at the hearing for better recognition of, and response to, the management of cross tenure caves.

Craig Flowers (representation 8) stated at the hearings that the management plan would not work unless neighbouring landowners were involved and supported the Draft Plan. Mr Flowers claimed that a large proportion of his land was covered in sinkholes that prevented tree harvesting because of the karst and the national park. He questioned what the value of the karst was, and contended that the real issue was compensation.

Adjoining landowners and other local residents who gave evidence at the hearing asserted that the presence of karst on their property restricted what they described as their land use rights. The restrictions identified were upon forestry activities, crop planting and the use of fertilisers. The issue of trespass was also raised.

Director's response

The Director's response principally addressed submissions from individual cavers and the caving clubs, more so than from adjoining landowners. The concerns of landowners largely emerged at the public hearing.

The Director recommended that the final plan should provide a mechanism for involvement of landowners and cavers in policy development through the establishment of a Cave Management Advisory Committee.

Commission's commentary

Access, payment for access, compensation and perceived liability claims surfaced as issues of concern to neighbouring landowners. The fact that a number of neighbouring landowners have "ownership" of caves highlights the need to develop an improved relationship with neighbouring landowners.

The identified blocks that comprise the Park were previously reserved land for many years. Management issues raised by neighbouring landowners are not directly a result of the reserves being declared a national park. Trespass would be an issue irrespective of the status of the area as a national park.

The weight of evidence from the representors, and adjoining landowners who attended the hearing was that in a real or perceived sense the relationship between PWS and adjoining landowners needs to be improved. The Commission considers that these processes are essentially external to the Draft Plan.

The Commission accepts the position put forward by Craig Flowers (Representation 8) that the management plan will not work unless neighbouring landowners are involved and supportive.

Consultative arrangements, committee structures and other mechanisms, as suggested in the Draft Plan, that seek to involve interest groups require management, resourcing and structures that embrace outcomes. The Director's recommendation for the establishment of a Cave Management Advisory Committee is supported.

Recommendation 10

Alter section 7 of the Draft Plan to include discussion, policy and action dot points on the establishment of a Cave Management Advisory Committee. This committee is to provide a forum for stakeholders and advice to PWS on matters relating to cave and karst management. The membership of the committee should include but not be limited to representatives of adjoining landowners (including Forestry Tasmania), the Aboriginal community, recreational cavers, commercial cave tour operators and the PWS.

2.5 Caves and caving

Sections 5.5, 5.7 and 6 of the Draft Plan deal with matters related to caves and caving.

2.5.1 Relationship with cavers

Representations

Caving groups voiced concern about the process of the creation of the Park and the drafting of the Draft Plan. They contended that there was a lack of consultation on the Draft Plan. They also stated that the Draft Plan did not acknowledge past endeavours

that directly involved caving groups in management, maintenance, cleaning, exploration and general custodianship of caves. Cavers contended that caving culture was not acknowledged within the Draft Plan.

Cavers considered the PWS approach to the management of the Park as being inappropriate (such as gating of caves), and that without cavers' assistance PWS would not be able to effectively manage the Park. Cavers supported the concept of an effective Cave Management Advisory Committee.

Director's response

The Director, in response to the concerns of cavers, stated that:

“The final plan should better acknowledge the considerable role played by club and individual cavers in the past and provide for their active involvement in ongoing management of the caves.”

The Director recommended that the final plan should provide a mechanism for involvement in policy development by establishing a Cave Management Advisory Committee similar to that which existed prior to the establishment of the District Consultative Committee.

Commission's commentary

The Commission supports the Director's response and proposed recommendations.

Recommendation 11

Alter section 5.7.5 of the Draft Plan to acknowledge the role that cavers have had in the discovery, mapping and management of the caves.

2.5.2 Restricted access caves

Representations

Many representations lodged by cavers opposed the cave access restrictions and permit requirements specified in the Draft Plan. Cavers contended that the PWS approach to management of caves was to lock them up with no justification for doing so. Some cavers contended that the PWS did not care if caving was closed down altogether.

Gary Smith and Jeff Butt (Representations 5 and 7) contended that restricted access would force cavers to visit more remote and sensitive caves.

Caving representations stated that it was currently difficult to gain qualifications as cave guides. These representations stated that there had only been one accreditation course and that the lack of resources within PWS made it unlikely that an accreditation system would work.

Cavers also contended that the strict conditions placed upon permits to enter caves such as Kubla Khan could lead to safety concerns. The small 'time window' provided on permits meant that some cave groups may be encouraged to enter caves when it was unsafe to do so, such as after heavy rains.

One representor questioned the accuracy of the boundaries of the reserves and suggested that the entrance to Herberts Pot could be in the conservation area and not on private land as stated in the Draft Plan. Another representor stated that if this was not the case then Herberts Pot could not be added to the restricted access list because the entrance was on private land.

Garry Smith (Representation 5) sought to have the plan recognise Australian Speleological Federation (ASF) affiliated cavers.

A number of representors opposed the reduction in the number of permits issued for Croesus and Kubla Khan Caves.

Janice March, on behalf of the Northern Caverneers (representation 23), contended at the hearing that caving clubs should have their own set of keys to the gated caves, and that a permit system for entry to caves be introduced that is understandable by caving clubs.

Director's Response

The Director advised that:

“the final plan should summarise the access restrictions for each cave and provide justification for these.”

In response to concerns over access restrictions to Croesus Cave the Director stated:

“The final plan will clarify the access restriction on Croesus Cave. The 12 trips per year prescribed in the draft plan are recreational trips additional to currently licensed commercial trips. The final plan should propose that once the current commercial operator’s licence expires the access restriction will become 25 trips per year total (recreational and commercial).”

In relation to the issue of permits being inflexible, the Director stated:

“This criticism is accepted and should be addressed by a mechanism which is acceptable to both PWS managers and the caving community. For example, this could be more flexible permit conditions or automatic reissue of permits where safety considerations have made the original permit unusable.”

Commission’s commentary

Restrictions on access to caves arise from:

- the cave entrance, or portions of the cave, being outside the Park and predominantly in private ownership; or
- the sensitivity of a cave to damage, management constraints and safety issues.

Mechanisms for restricting access currently include some or all of the following and are applied on an individual cave basis:

- gating of entrances;
- requirement for an access permit; and
- restrictions on the number of permits issued on a per annum or monthly basis.

The Draft Plan describes the importance of the Mole Creek caves and their sensitivity to impact from visitation. The importance of the caves is not disputed, but varying views exist on the “robustness” of caves. It is acknowledged that some caves have been intruded upon by works and modifications more than other caves. There has been major intrusion and modification of the show caves of Marakooa and King Solomons through to the gated restricted permit caves, where intrusion and modification has been minimal.

The evidence is that demand for entry to restricted access caves is greater than the assessed capacity of the caves, particularly under current PWS resourcing regimes. Although resourcing of management is beyond the scope of the Draft Plan to address it is a factor that influences management. In circumstances where resources are limited restrictions will be necessary. The primary management objective should be to conserve and protect the caves and karst systems. Where the managing authority does not have the resources to manage access, then access should be restricted. To do otherwise would result in irreparable damage, whether intentional (theft or vandalism)

or unintentional. Every access in the virtually pristine, less robust caves, is likely to leave evidence of that access.

The management responses in the Draft Plan regarding access largely continue past practices, and are a blunt, but not inappropriate mechanism for reducing impact upon the caves. In essence the restrictions are a form of rationalising access. If such measures help preserve, prevent or minimise further degradation of a cave, then they are appropriate.

No representations put forward alternative mechanisms that would ensure better protection of the cave environment. No representations argued that continuation of the proposed regime of gating and permits would lead to degradation of those caves. The Commission was not presented with evidence that the gating of caves has led to increased negative impacts upon other caves. The approach presented in the Draft Plan is assessed by the Commission as being a pragmatic response to protection of the karst system.

Whilst some representations argued against the limited number of permits issued to particular caves under the Draft Plan, the Commission supports this approach. Restrictions on the number of permits may enhance the intrinsic value of the restricted access caves, and result in a higher level of user care. Appropriately, the Draft Plan errs on the side of caution. The Commission accepts the position advocated by the Director regarding the number of available permits to restricted access caves.

On the issue of the plan applying restrictive access limitations on Herberts Pot, if this cave is outside the park boundaries then, consistent with other responses over issues involving land outside the Park, the restrictions should be deleted from the Draft Plan. The Commission recommends that the exact location of Herberts Pot be established prior to finalisation of the Draft Plan.

Recommendation 12

Delete prescriptions with in the Draft Plan on the control of access to caves where cave entrances are outside the Park.

Recommendation 13

A boundary survey be conducted by PWS to determine whether the entrance to Herberts Pot is with in the Park, before the plan is finalised.

Recommendation 14

Alter section 5.7.5 of the Draft Plan to enable permits to appropriately respond to cave conditions in the interests of safety.

2.5.3 Commercial operations

Representations

Representations 7, 12 and 13 supported the policies and actions in the Draft Plan that proposed removal of access for commercial guides to restricted access caves.

In contrast, Debbie Hunter, on behalf of Wild Cave Tours (Representation 10), contended that it was grossly unreasonable to suggest that commercial operators were causing the damage to caves and not other cavers. Ms Hunter submitted that restricted access caves not being available for licensed caving tours was a new policy. Ms Hunter further contended additional restrictions increased the difficulty for Wild Cave Tours to operate. At the hearing Ms Hunter expressed the view that closer cooperation between commercial guides and PWS was required to expand the visitor experience.

Director's response

The Director concurred that lack of access to caves for commercial tour operations was an issue, particularly the loss of caves suitable for beginners. This loss of access was, according to the Director, mainly due to issues of private ownership of the land. The Director stated that the PWS was keen to ensure the ongoing viability of commercial wild cave tours, but did not support opening more sensitive caves to commercial groups. The Director identified prescriptions within the Draft Plan on liaison with landowners as a means of regaining access to caves whose entrances are in the Park but extend onto private land. The Director made no recommendations to change the plan.

Commission's commentary

There is one current licensed commercial cave tour operator. The Draft Plan proposes to limit access to a few caves on the basis of "*suitability on environmental grounds.*" The Draft Plan also states that "*licenses for commercial cave tours will be subject to such conditions and constraints as required to protect cave values.*"

The Park contains a range of caves, particularly those that fall into the category of sensitive. The more sensitive caves have access limitations specified in the Draft Plan, including gating and restricted access. The Draft Plan opposes commercial tours within restricted access caves.

The caves classed for recreational caving and beginners caving are limited in the Park. Combined with restrictions on access to caves outside the Park, tour operations are severely limited, particularly for novice cavers. The Director's report states that the PWS is keen to ensure the ongoing viability of commercial wild cave tours but without opening the more sensitive caves to commercial groups.

The representations and the Draft Plan reveal different levels of competence with respect to cavers. There are recreational cavers (some affiliated with the ASF), school groups, scout groups, scientific and exploratory cavers and individuals, who seek

guides and commercial operators to provide them with a wild caving experience. Consistent with the objectives for management for a national park in the NPW Act, the concern of the Draft Plan should be protection of cave values rather than determining access based solely upon whether the trip is for commercial or recreational purposes.

The Draft Plan states that *“a tour guide can not possibly assess the capability of customers,”* the Commission contends that the same could equally apply to recreational groups.

It would appear equitable and beneficial to provide for commercial caving in all caves, subject to the same limitations which apply to all cave users. That is, restrictions on access should not discriminate simply because a commercial operation is involved. Restrictions on access may include number limits or specify qualifications/experience to enter certain caves. This would allow experienced cavers to access caves under an accredited and experienced guide. This approach may also encourage appropriate accreditation of guides, which was raised by cavers.

Recommendation 15

Alter section 5.7.5 to enable cavers to enter restricted access caves provided they are accompanied by an accredited guide (commercial guide or otherwise).

Recommendation 16

Alter section 5.7.5 of the Draft Plan so that restrictions on access apply equally for commercial and non-commercial entry to restricted access caves.

2.5.4 Wet Cave block

Representations

The Wet Cave block that includes Wet Cave and Honeycomb Cave was the focus of a large proportion of representations. Issues ranged from access to Wet Cave, suitability of Honeycomb Cave to beginners, access by tour operators, a proposed karst walk and camping at Wet Cave. Cave interest focused on retention of the status quo in terms of access and informal camping, and opposition to the concept of a Visitor Services Zone.

The neighbouring landowners to Wet Cave (Representation 30) stated that they were utterly opposed to the Draft Plan, so far as it related to the Wet Cave block. They considered that it completely failed to address the liability issues, arising from people in caves under their property, to which they claimed ownership because their land title is to the “centre of the earth”. Mrs Martin stated that a gate should be installed in Wet Cave on the ownership boundary, 70 metres from the entrance of the cave.

Iain McCulloch (Representation 11) contended that the proposals for the Wet Cave block seemed to be aimed at discouraging current cave users, and encouraging increased use of the site by day visit non-caving tourists.

A number of representations requested retention of casual low key camping at Wet Cave. Some representors argued for the deletion of the proposed Visitor Services Zone and the proposed karst walks and self guided tours at Wet Cave. They proposed an alternative walk be developed at Sensation Gorge. The majority of cavers stated that any such development would be dangerous and would cause the loss of Tasmania's premier beginner wild cave resource.

Directors' response

The Director outlined two responses relating to the development of camping at Wet Cave:

“- If the proposed surface karst walk at this location proceeds then the current informal camping arrangements are incompatible with this development and will cease.

- If the proposed surface karst walk at this location does not proceed then a limited amount of camping should be permitted to continue, subject to monitoring and action if unacceptable impacts are observed. An appropriate toilet should be installed.

- The PWS considers that the Wet Cave area should not be allowed to evolve into another developed camping area. The PWS notes that a developed camping area is available 10 km away at Sassafras Creek.

In response to concerns regarding the proposed surface karst walk and self-guided underground karst walk, the Director stated:

“The revised plan should acknowledge that there are significant safety and public liability issues which will need to be addressed in planning the proposed karst walk.

The PWS does not accept that the use of the cave and associated surface karst features for a karst walk necessarily precludes its use as a caving venue; this is an issue that can be resolved with careful planning.

The Honeycomb Cave location has the most spectacular surface karst features but also has potential safety concerns. The Sensation Gorge area contains some interesting, but less spectacular karst features and fewer apparent safety concerns. The final plan should recommend the investigation of a surface karst walk at either Honeycomb Cave or Sensation Gorge. The final plan should require:

- *Identification of options;*

- *Risk assessment;*
- *An EIS (including impact on existing users) to be prepared and subject to public comment;*
- *Monitoring.”*

Commission’s commentary

A number of sections in the Draft Plan refer to the development of an interpretive karst walk in the Visitor Services Zone at Wet Cave. A karst walk at Wet Cave and another at Marakoopa are proposed to enable visitors to readily view karst features on the surface. In relation to the safety and liability concerns raised by representors, these concerns cannot be ignored, however the Commission does not consider that this should prevent investigation of the potential of the karst walk as a means of providing interpretation. Neither does the Commission consider that development of a karst interpretation walk would conflict with usage of the area as a beginner cave resource; in fact the two uses would seem mutually beneficial. The Director’s view that the Draft Plan should specify options, risk assessment and environmental impact statement is not considered necessary and should be part of the investigation that would precede provision of such visitor infrastructure.

The Draft Plan identifies the development of a walking track to access Sensation Gorge. Sensation Gorge is described in the Draft Plan as a significant landform, not a significant karst feature. Sensation Gorge therefore does not provide an alternative site for a surface karst walk (such as that proposed for the Wet Cave block), but would appear to present other values worthy of interpretation. Reference to a walking track in the description for Sensation Gorge in section 6.7 should be followed through into policies and actions within the Draft Plan.

The concept of a Visitor Services Zone, as shown in section 2.5 of the Draft Plan, is areas catering for the majority of Park visitors, with high quality visitor services facilities or areas primarily developed for day use. Clearly fitting this description are the Visitor Services Zones for Marakoopa and King Solomons Caves. Nevertheless the two other Visitor Services Zones at the Wet Cave block and the Croesus Cave block do signal a different approach to management of the majority of the Park, which is in the Natural Zone. The Draft Plan specifies that development in the Visitor Services Zone will be guided by relevant site plans.

A number of representors advocated the removal of the Visitor Services Zone at the Wet Cave block, aiming to retain the status quo of informal camping. However, under the Draft Plan, removal of the visitor services zoning would not assist their case, as the alternative ‘Natural Zone’ does not permit camping.

The Draft Plan describes camping at Wet Cave as used by school parties or as a base for bush walking trips further afield. The Draft Plan identifies management issues with informal camping, including toilet waste disposal and firewood collection.

Mrs Martin (Representation 30) forcefully stated the impact of camping activities on the Wet Cave block at the hearing, and identified trespass as the major issue. Advocates for retention of informal camping at Wet Cave appear to understate the impact of such activity. In contrast the adjoining landowner perceives a greater impact.

The Wet Cave block is within settled areas of private land, with formal camping areas apparently available within reasonable distance. In terms of land management issues, a formal camping site should not be established. However, the Director's recommendation for toilet facilities at Wet Cave is supported.

The Wet Cave block is a readily accessible cave system at the eastern end of the national park and, no doubt, will continue to be the focus of visitor attention. A portion of the block zoned visitor services is therefore consistent with the objective for zoning. The level of development will need to be determined by a site plan, as prescribed in the Draft Plan.

In relation to the concerns of the Martins (Representation 30) the Commission does not recommend that a gate or fence be erected across Wet Cave, 70 metres from the entrance. This is considered potentially dangerous and damaging. Although gating may prevent deeper penetration of Wet Cave by visitors, the gate and infrastructure may be dislodged during high stream flow, potentially damaging the downstream portion of the cave. The Commission accepts the Director's response that PWS is not responsible for trespass of Park visitors onto neighbouring land.

The concerns of the Martins regarding access, payment for access and perceived liability in relation to ownership of caves are matters, which currently remain unresolved.

Recommendation 17

Alter section 6.7 of the Draft Plan to include policy and action dot points in support of the proposed walking track at Sensation Gorge.

Recommendation 18

Alter Section 5.6.8 of the Draft Plan to clarify that toilet facilities at the Wet Cave block shall be provided but formal camping shall not be developed.

Recommendation 19

The issue of private ownership of underground caves needs to be resolved in terms of liability and responsibility, in order to provide for managed public access to the affected caves.

2.5.5 Camping at Croesus Cave block

Representations

Garry Smith (Representation 5) sought retention of low key camping at Croesus Cave block.

Director's response

The Director confirmed that the Draft Plan should clarify that the vehicle based camping is to be retained.

Commission's commentary

The Draft Plan states that the Visitor Services Zone is an area next to the Mersey River and that low key camping will be permitted, but not encouraged, at this site. Camping elsewhere will be actively discouraged.

The Commission agrees with the Director that informal vehicle based camping in the proposed Visitor Services Zone at the Croesus Cave block continue, and be reviewed if inappropriate impacts are experienced.

2.5.6 Westmorland Cave environmental flows

Representations

Representations 5, 10, 11, 16 raised the issue of maintenance of environmental flows in Westmorland Cave and other downstream caves including Wet Cave. Westmorland Falls stream is diverted around the mouth of Westmorland Cave to provide irrigation water via the "9 foot channel." The representations requested urgent action to restore environmental flows to Westmorland Cave.

Director's response

The Director did not respond to this issue.

Commission's commentary

The Draft Plan reports that the Westmorland channel is outside the Park and management is the responsibility of others. However, the Draft Plan identifies the interest of the Park in this issue. The Commission recommends that mechanisms be established to monitor the effect of water extraction from Westmorland Falls stream upon Westmorland Cave and, if adverse impacts are resulting, remedial measures be undertaken.

Recommendation 20

Alter section 6.9 to include a dot point that requires a monitoring program to measure impacts upon the caves resulting from the extraction of water from Westmorland Falls Creek to the 'Nine Foot' channel.

2.5.7 King Solomons Cave exit tunnel

Section 5.6 of the Draft Plan addresses development proposals for the Park and section 6.4 issues concerning the King Solomons Cave block.

Representations

Janice March (Representation 23) noted that the Draft Plan at section 5.6 did not refer to a proposed tunnel to exit King Solomons Cave, although this had received mention in the State Budget. The representation sought more environmental information on the proposal.

Director's response

The Director advised that the issue was mentioned in section 6.4 but was not given particular prominence. The Director stated that:

“Since it clearly has the potential for major environmental impacts as well as substantial modification to the existing use of King Solomons Cave, the revised plan will make it clear that it is under consideration. The revised plan should require:

- *identification of options;*
- *an Environmental Impact Statement and Environmental Management Plan to be prepared and subject to public comment;*
- *monitoring.”*

Commission's commentary

The Draft Plan at section 6.4 discusses the potential for another entrance to King Solomons Cave. The relevant action 2 states:

“Assess the environmental impacts of the proposal to create another entrance into King Solomons Cave.”

Section 5.6 details the requirements for assessing development proposals in the Park. This section is comprehensive and covers the requirements for Environmental Impact Statements and monitoring. In addition the Draft Plan specifies the requirement of a site plan for the Visitor Services Zone at King Solomons Cave. The action in section 6.4 quoted above is relevant to establishing baseline data. It is understood monitoring of various factors is currently in progress. The Commission does not consider the Director's suggested changes to section 6.4 to include environmental impact statements necessary.

2.5.8 Minimal impact caving code

Section 5.5 of the Draft Plan concerns visitor impacts, including an action on the development of a minimal impact caving code.

Representations

Janice March (Representation 23) contended that the Draft Plan should rely on the “*Australian Speleological Federation (ASF) code of ethics and conservation and minimal impact caving code*” rather than the Department developing a code based on the ASF code. Ms March further stated that the ASF code should be adopted because it acknowledges the standards and work developed by cavers, is part of an Australian wide code, and it would save the need to develop a new code.

Director’s response

The Director did not consider that the current ASF Code of Conduct was entirely suitable and recommended that the Draft Plan formalise a code of conduct for cavers. It was proposed that this be resolved, either by some minor changes to the ASF Code to better reflect Tasmanian conditions, or by the development of a Tasmanian Minimum Impact Caving policy.

Commission’s commentary

The Draft Plan incorporates the ASF code at Appendix 9 and the Joint Management Protocol at Appendix 7 applies the code as a minimum standard but also allows for additional requirements to be specified. The Draft Plan specifies this in action dot point 3 in clause 5.5, which states:

“The department, in consultation with caving groups, will develop and disseminate a Minimal Impact Caving code. This will be distributed with any permit issued for caves in the Reserve, and will be made available at other popular cave entrances. The Code will be developed taking full account of the Australian Speleological Federation Code of Ethics and Conservation, and their Minimal Impact Caving Code. During preparation of this code, the ASF codes will constitute the minimum behavioural standard acceptable in caves within the Park (see Appendix 9).”

Whilst the Draft Plan embodies the ASF code it identifies a need to develop a more comprehensive code. The ASF code sets base standards for behaviour by cavers but the availability of this code should not preclude the development of an extended code covering cave behaviour of greater relevance to Tasmanian caves.

2.6 Park flora and fauna

The Draft Plan considers the fauna and flora of the Park in section 3 and Appendices 4, 5 and 6.

Representations

Stefan Eberhard (Representation 22) contended the Draft Plan in respect to cave fauna over emphasises just a few caves, particularly Baldocks Cave, and that cave fauna was not considered at the fundamental levels of biological population, species, community and ecosystem. The representation advocated and described 3 major directions for future cave biological work at Mole Creek.

Director's response

The Director recommended the plan be corrected but did not specify in what manner.

Commission's commentary

Section 3.6 of the Draft Plan concerns surface and cave fauna. Mr Eberhard (Representation 22) is the authoritative reference for the section on cave fauna in the Draft Plan. The representation was not reduced to a form that would readily "allow the plan to be corrected" as determined by the Director. The matter raised in the representation requires work involving specification of taxonomy description, research and baseline surveys. The merit of this work and subsequent resourcing is a matter for determination. The Draft Plan prescribes a range of actions including investigation, assessment and monitoring including to "*Implement recommendations of Reconnaissance Survey of Cave Fauna Management Issues in the Mole Creek Karst National Park, Tasmania. Eberhard (2000).*"

The inclusion of a detailed species list within a statutory management plan is problematic. Such lists can never be comprehensive and will be subject to upgrading if new flora or fauna are discovered or no longer found in the Park. A change to the appendices to keep the list relevant would require formal alteration to the plan. Such lists should be outside the statutory plan, but may be bound to the document if desired.

Recommendation 21

Alter the text as required to clarify that Appendices 4, 5 and 6 are not part of the Draft Plan.

2.7 Assessment of development and World Heritage

Sections 1.2.3, 3.7 and 5.6 refer to the inclusion of the Marakoopa Cave block in the Tasmanian Wilderness World Heritage Area (WHA).

Representations

Greg Middleton and Kevin Kiernan (Representations 14 and 29) contended that the impact assessment process applicable to the Marakoopa Cave block, by virtue of it being within in the Tasmanian Wilderness World Heritage Area, should be extended to other areas of the Park. It was contended that confining the proposed assessment process to the Marakoopa Cave block could lead to poor integration. The representations noted that the Draft Plan stated that other parts of the Park are potentially of World Heritage value.

Director's response

The Director did not specifically respond to this issue.

Commission's commentary

Policy dot point 20 of the Draft Plan in section 5.6 states:

"Developments in the Marakoopa Cave block will be subject to the new proposals and impact assessment process prescribed in the Tasmanian Wilderness World Heritage Area Management Plan 1999 (pp. 66-72), or future amendments of that plan."

At section 3.7 the Draft Plan asserts:

"Other parts of the park are potentially of World Heritage value, but remain outside the WHA. In particular, karst in the Mole-Lobster catchment, Kubla Khan Cave and Croesus Cave areas 'would, collectively and individually, contribute significant further values' to the WHA (Department of Parks, Wildlife & Heritage 1990)."

The Draft Plan also explains that:

"When this plan is approved in accordance with the National Parks and Wildlife Act 1970, it will be considered a "specific plan" and the Tasmanian Wilderness World Heritage Area Management Plan 1999 will be considered a "general plan", in accordance with Section 19(1c) of the NPW Act. The provisions of the specific plan will prevail over the provisions of the general plan to the extent of any inconsistency."

Although the specific overrides the general, and the approval processes detailed in section 5.6 may be comprehensive, section 5.6 extends the “*WHA new proposals and impact assessment process*” to the Marakoopa Cave block. If an objective is that other parts of the Park should be contenders for World Heritage nomination then it would appear appropriate that the “*WHA new proposals and impact assessment process*” apply consistently across the Park.

Recommendations 22

Section 5.6 be altered to require developments within the Park to be subject to the “*new proposals and impact assessment process*” prescribed in the *Tasmanian Wilderness World Heritage Area Management Plan 1999* (pp. 66-72), or future amendments of that plan.”

2.8 Aboriginal heritage

Section 3.8.1 describes the Aboriginal heritage of the Mole Creek area. The Draft Plan states:

“the Park has not been systematically surveyed for Aboriginal heritage. Sites need to be located and protected, particularly from the impacts of development and visitor use. There is potential for the Tasmanian Aboriginal community to promote and interpret these sites to the wider community and provide greater understanding of Aboriginal culture in the park. To date there have been no archaeological surveys conducted in the Park and Conservation area.”

Representations

The representation from the Tasmanian Aboriginal Land Council (TALC) requested alterations to the actions in section 3.8.1 to include reference to a Tasmanian Aboriginal Heritage Officer’s involvement in the recording of sites and for the Tasmanian Aboriginal community to have representation on a steering committee or working party.

Director’s response

The Director agreed that the TALC's suggested changes should be incorporated in to the Draft Plan.

Commission’s commentary

The Commission accepts the changes proposed by TALC and supported by the Director.

Recommendation 23

Alter section 3.8 to require a Tasmanian Aboriginal Heritage Officer's involvement in the recording of Aboriginal sites and that a representative of the Tasmanian Aboriginal community be a member of the proposed Cave Management Advisory Committee.

2.9 Maps of Visitor Services Zones

The Draft Plan prescribes Visitor Services Zones for King Solomons, Marakoopa, Croesus and Wet Cave blocks. The areas for Visitor Services Zone are shown in the Draft Plan at Map 2, and Maps 3 and 4 show indicative layouts of King Solomons and Marakoopa Visitor Services Zone. No detailed plans are provided for the Croesus and Wet Cave blocks Visitor Services Zones.

Representations

Representations 29 and 33 objected to the lack of definition of the Visitor Services Zone boundaries, and questioned whether, in a three dimensional context, the sensitive and potentially hazardous caves were inappropriately included in the Visitor Services Zone.

Director's response

The Director did not specifically address this issue.

Commission's commentary

The Draft Plan at sections 6.3, 6.4, 6.6 and 6.8 refer to the development of site plans that address surface and underground management issues. Maps 3 and 4 whilst included in the Draft Plan, do not appear to be referred to in the text. The significance and relevance of Maps 3 and 4 is unknown. They at best indicate the current facilities at King Solomons and Marakoopa. The Draft Plan specifies that site plans are to be developed and through these plans the three-dimensional and boundary issues raised in the representation can be addressed. The indicative site plans at maps 3 and 4 should be removed from the Plan.

Recommendation 24

Maps 3 and 4 to be deleted from the Draft Plan

2.10 Signage and promotion

Signage and promotion of the Park is considered within sections 5.2 and 5.3 of the Draft Plan.

Representations

Representations 7, 10 and 11 contended that only the showcase caves, Marakoopa and King Solomons should be signposted or appear on maps and other tourist information. This was stated as a means of protecting caves. Representation 19 contended that promotion for tourism needed to be improved, without compromising the natural experience and conservation values of the Park. Cavers considered that Honeycomb Cave was not suitable for casual visitation.

Director's response

The Director did not specifically address this issue.

Commission's commentary

The Draft Plan concerns promotion and signage principally in section 5.2 and 5.3. The Draft Plan is clear in giving priority to providing interpretation programs and facilities at Visitor Services Zones at King Solomons, Marakoopa and Wet Caves, and to a lesser extent at Croesus Cave. The Draft Plan also states that on-site interpretation in the Park is currently limited. The Commission considers that the policies and actions in the Draft Plan are sufficiently sensitive to promotional issues and do not require alteration.

3.0 Consolidated principal recommendations

This chapter of the report draws together the Commission's principal recommendations from chapter 2.

Recommendation 1

Alter sections 1, 3, 5, 6, 7, and 8.1 of the Draft Plan, particularly the management prescriptions, to clearly present the context of the Park - as a disjointed, non-contiguous reserve with the majority of the karst system outside the Park.

Recommendation 2

Alter references to the Mole Creek Karst National Park and Conservation Area which state that it protects an internationally significant karst system, to make it clear that the Park encompasses a relatively small part of the entire karst system of Mole Creek.

Recommendation 3

Insert a map showing the surrounding land tenure of the Park, in section 1 of the Draft Plan.

Recommendation 4

Alter section 8.7 of the Draft Plan to provide for the review of the Management Plan in five years or when any major land tenure changes occur. The planning area for the review should include the relevant part of the Great Western Tiers Conservation Area and any other reserves that include part of the karst catchment.

Recommendation 5

Alter section 7.2 to provide greater detail on how the PWS will work with neighbours in the future to improve cross tenure land management.

Recommendation 6

PWS and Forestry Tasmania to investigate the creation of a forest reserve for the Mill Creek-Kansas Creek catchment (under s.20 of the *Forestry Act 1920*) to be managed according to s.19 (1B) of the NPW Act.

Recommendation 7

Alter section 6.3 of the Draft Plan to include a map of the area covered by the Mill Creek-Kansas Creek Joint Management Protocol.

Recommendation 8

Omit action dot point 4 from section 6.1 of the Draft Plan and substitute:

Pursue options for securing legal public access to the Sassafras Cave block.

Recommendation 9

Alter the text in section 6.1 to confirm that road reserves provide lawful access.

Recommendation 10

Alter section 7 of the Draft Plan to include discussion, policy and action dot points on the establishment of a Cave Management Advisory Committee. This committee is to provide a forum for stakeholders and advice to PWS on matters relating to cave and karst management. The membership of the committee should include but not be limited to representatives of adjoining landowners (including Forestry Tasmania), the Aboriginal community, recreational cavers, commercial cave tour operators and the PWS.

Recommendation 11

Alter section 5.7.5 of the Draft Plan to acknowledge the role that cavers have had in the discovery, mapping and management of the caves.

Recommendation 12

Delete prescriptions with in the Draft Plan on the control of access to caves where cave entrances are outside the Park.

Recommendation 13

A boundary survey be conducted by PWS to determine whether the entrance to Herberts Pot is with in the Park, before the plan is finalised.

Recommendation 14

Alter section 5.7.5 of the Draft Plan to enable permits to appropriately respond to cave conditions in the interests of safety.

Recommendation 15

Alter section 5.7.5 to enable cavers to enter restricted access caves provided they are accompanied by an accredited guide (commercial guide or otherwise).

Recommendation 16

Alter section 5.7.5 of the Draft Plan so that restrictions on access apply equally for commercial and non-commercial entry to restricted access caves.

Recommendation 17

Alter section 6.7 of the Draft Plan to include policy and action dot points in support of the proposed walking track at Sensation Gorge.

Recommendation 18

Alter Section 5.6.8 of the Draft Plan to clarify that toilet facilities at the Wet Cave block shall be provided but formal camping shall not be developed.

Recommendation 19

The issue of private ownership of underground caves needs to be resolved in terms of liability and responsibility, in order to provide for managed public access to the affected caves.

Recommendation 20

Alter section 6.9 to include a dot point that requires a monitoring program to measure impacts upon the caves resulting from the extraction of water from Westmorland Falls Creek to the 'Nine Foot' channel.

Recommendation 21

Alter the text as required to clarify that Appendices 4, 5 and 6 are not part of the Plan.

Recommendations 22

Section 5.6 be altered to require developments within the Park to be subject to the "new proposals and impact assessment process" prescribed in the *Tasmanian Wilderness World Heritage Area Management Plan 1999* (pp. 66-72), or future amendments of that plan."

Recommendation 23

Alter section 3.8 to require a Tasmanian Aboriginal Heritage Officer's involvement in the recording of Aboriginal sites and that a representative of the Tasmanian Aboriginal community be a member of the proposed Cave Management Advisory Committee.

Recommendation 24

Maps 3 and 4 to be deleted from the Draft Plan

Appendix 1 - List of representors

Rep. No.	Representor
1	Arthur Clarke
2	John Dickson - Tasmanian Aboriginal Land Council, Aboriginal Corporation
3	Penny Wells - Forestry Tasmania
4	Andrew Blakesley - Department of Infrastructure, Energy and Resources
5	Garry Smith - Newcastle and Hunter Valley Speleological Society
6	Ed Turner
7	Jeff Butt
8	Craig Flowers
9	Henry Shannon
10	Deborah Hunter - Wild Cave Tours
11	Iain McCulloch
12	Stephen Bunton - Southern Tasmanian Caverneers
13	Stephen Bunton
14	Greg Middleton - Department of Primary Industries, Water and Environment
15	Stephen Harris - Department of Primary Industries, Water and Environment
16	Phil Parsons - The Environment Association (Deloraine)
17	Nicholas Fitzgerald – Bushcare
18	President Tas Uni Union Moles Society
19	David Wools-Cobb
20	Mole Creek Caving Club
21	Ron Mann
22	Stefan Eberhard – Caveworks
23	Janice March - Northern Caverneers Incorporated
24	Michael Lichon
25	Yoona Wellings
26	Lorraine O'Keefe Sydney University Speleological Society
27	Nathan Duhig - Forest Practices Board
28	Ralph and Barbara Cooper - Birds Tasmania
29	Kevin Kiernan
30	Sally and Noel Martin
31	Cathie Plowman - Department of Primary Industries, Water and Environment
32	Peter Brown - Department of Primary Industries, Water and Environment
33	Bruce Davis - National Parks and Wildlife Advisory Council

Appendix 2 - Director's report

MOLE CREEK KARST NATIONAL PARK SUMMARY OF COMMENT ON DRAFT MANAGEMENT PLAN & RESPONSE BY DIRECTOR OF NATIONAL PARKS AND WILDLIFE – 23 OCTOBER 2001

This summary and response has been prepared by the Parks and Wildlife Service Division of DPIWE, informed by advice from the Nature Conservation Branch of the Resource Management and Conservation Division.

A. SUMMARY OF MAJOR ISSUES AND DIRECTOR'S RESPONSE

Director's response is **in bold**.

1. LIMITATIONS IMPOSED BY THE NATURE OF THE NATIONAL PARK.

Many respondents criticised the draft plan for implying that the scattered blocks, which comprise the park, protect the karst values of the area and for ignoring the considerable threats to the values of the karst that originate from outside the reserved area.

The Mole Creek Karst National Park is clearly an unusual national park presenting unusual management problems, consisting as it does of eleven discrete blocks set among a range of other land tenures. The PWS acknowledges that many of the major values for which it was reserved lie underground and often extend under adjoining land tenures and that many of the major threats to the values of the area derive from outside the reserved blocks. For example, the streams which flow through the karst have their headwaters upstream of the reserved blocks and are subject to pollution and flow diversions before they reach the karst.

Since this is a management plan for a national park, prepared under the National Parks and Wildlife Act 1970, it is very limited in the recommendations which it can make for actions beyond the boundaries of the blocks which comprise the national park. This is a major role of the Mole Creek Integrated Catchment Management Strategy which is currently being prepared. The final plan should explain the relationship of this document with the plan and make it clear that this is the main document in which the off-reserve management issues are to be resolved.

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Many of the respondents expressed the view that extensions to the national park should be explored while Forestry Tasmania suggested that the recommendation to this effect within the draft plan was inappropriate.

It is considered to be beyond the scope of a national park management plan to make recommendations re extensions. Therefore it is proposed that the recommendation for the formal reservation of the Mill Creek – Kansas Creek catchment be modified to an acknowledgment of the significance of this area.

However, it should be noted that karst was not a value considered in RFA, and DPIWE, in conjunction with

DIER, has a program of identifying priority land for potential protection of karst values. This protection would not necessarily be by formal reservation, for example conservation covenants or other management agreements could be suitable.

Many of the respondents expressed the view that the management plan should cover other reserved land that contains part of the karst catchment.

There is no argument that it would have been useful for the plan to include other reserved land that contains part of the karst catchment, especially the relevant part of the Great Western Tiers Conservation Area. However, this would have been likely to have delayed completion of the plan, particularly as the karst catchment comprises only a small part of the extensive GWTC.

It is recommended that the management plan should be reviewed in five years or when any major land tenure changes occur. The planning area for the review would include the relevant part of the GWTC and any other reserves which include part of the karst catchment.

2. PLAN STRUCTURE AND CONTENT.

Some respondents considered the draft plan to be poorly structured with inadequate links between the background information and the policy proposals. It had suffered from being fitted into the standard PWS management plan template. It should be totally rewritten and subject to a further round of public comment.

The criticisms of the plan structure relate more to presentation than to substance. There is scope for making the final plan clearer, particularly to better link the context (both physical and management) to the proposed actions. This

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would address many of the criticisms of apparent lack of justification for particular proposals.

Two options deserve consideration:

- **The plan could be subject to a total rewrite and re-advertisement for public comment, or;**
- **The plan could be edited to address the major criticisms by, for example, more extensive cross referencing and indexing.**

The PWS considers that further public comment is not warranted and recommends the second option.

Several respondents raised specific queries regarding the location of particular features (whether or not they lie within the national park).

These need to be resolved prior to finalisation of the plan.

Several respondents queried the expertise of the author(s) of the draft plan and suggested that they should be identified in the plan.

It is not PWS policy to identify the authors of management plans. However, in this case, a number of cavers and scientific specialists have contributed their expertise and should be listed in an additional appendix in the revised plan.

3. DETAIL ON INDIVIDUAL BLOCKS.

The draft plan was criticised for both a lack of detail on management of the individual blocks comprising the national park, and for the dispersion of this information throughout the draft plan.

The revised plan should make it easier to locate all the recommendations for individual blocks by clarifying the division between general and specific prescriptions, and providing additional cross referencing. Greater detail is needed on the management of the two show caves (Marakoopa and King Solomons) and the three most significant of the other caves (Croesus, Kubla Khan and Wet/Honeycomb). This should be provided by the revised plan prescribing the production of subsidiary site plans for these individual blocks.

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4. RELATIONSHIP WITH THE CAVING COMMUNITY.

Many of the submissions come from individual cavers or caving clubs. They feel that they deserve more recognition for the substantial amount of effort that they have put into exploration and management activities at the caves over a very long period and that rather than this effort being recognised by PWS, they are being excluded from decision making and subject to unjustified access restrictions.

The final plan should better acknowledge the considerable role played by club and individual cavers in the past and provide for their active involvement in ongoing management of the caves. The final plan should clearly summarise the access restrictions (gates, numbers limits, any other conditions) proposed for each cave and provide justification.

It is apparent that the District Community Consultative Committee (DCCC) has not worked well as a means of communication between the PWS and the caving community. Caving issues are too specialised for the DCCC, and the DCCC is too generalised for the cavers. Some cavers are mainly interested in participating in on-ground management activities, while others are more interested in involvement in policy development. It is also apparent that there are operational issues (beyond the scope of the management plan) which have strained relations between PWS and the caving community. These particularly relate to the level of supervision of volunteers and the functioning of the accredited trip leaders scheme for particular caves.

Policy: The final plan should provide a venue for involvement in policy development by establishing a cave management advisory committee similar to that which existed prior to the establishment of the DCCC.

On-ground: A major recent development in the use of volunteers has been the establishment of a CaveCare group under WildCare. This provides a framework under which individuals can perform volunteer work within the caves. This can ultimately include unsupervised work on agreed projects.

Many of the submissions suggest that inadequate PWS staffing is a major contributing factor to the above problems, and have noted that several Mole Creek Ranger positions have been vacant for extended periods.

Details of staffing are operational matters beyond the scope of the management plan.

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5. ACCESS RESTRICTION INCLUDING COMMERCIAL ACCESS.

There are three largely separate issues here:

- Access for recreational caving.

Many respondents criticised the proposed numbers limits as unnecessarily restrictive and unjustified.

The final plan should summarise the access restrictions for each cave and provide justification for these.

The final plan will clarify the access restriction on Croesus Cave. The 12 trips per year prescribed in the draft plan are recreational trips additional to currently licensed commercial trips. The final plan should propose that once the current commercial operator's licence expires the access restriction will become 25 trips per year total (recreational and commercial).

There was criticism that tight permit schedules could lead to safety concerns. A permit valid for only twenty four hours could tempt a party (particularly one which has travelled a considerable distance to visit the caves) to enter the cave even in unsuitable conditions such as flooding.

This criticism is accepted and should be addressed by a mechanism which is acceptable to both PWS managers and the caving community. For example, this could be more flexible permit conditions or automatic reissue of permits where safety considerations have made the original permit unusable.

- Access for commercial cave tours.

The major current commercial operator of wild cave tours is concerned at the shortage of suitable caves for her operation.

Most of the problems have been caused by the recent closure of access across private land, or closure of caves which lie under private land, due largely to perceived liability concerns of the landowners. Unfortunately these include most of the caves most suitable for beginner use (which includes the clients on commercial trips).

The PWS is keen to ensure the ongoing viability of commercial wild cave tours without opening the more sensitive caves (which lie totally within the national park) to commercial groups. The draft plan already prescribes



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liaison with adjacent landowners regarding access to caves whose entrances are in the national park but which extend under private land (Sections 6.9, 7.1 & 7.2). No change to the plan is considered necessary.

- Access for management activities, by caving club members.

Refer #4 above.

6. CAMPING.

Many respondents have suggested that the proposed restrictions on camping are not justified by the impacts that are occurring. One agreed with the proposed closure of the Wet Cave block to camping.

Croesus Cave – the final plan should clarify that the existing vehicle-based camping is to be retained.

Wet Cave – the final plan should recommend that:

- If the proposed surface karst walk at this location proceeds (see #7) then the current informal camping arrangements are incompatible with this development and will cease.

- If the proposed surface karst walk at this location does not proceed (see #7) then a limited amount of camping should be permitted to continue subject to monitoring and action if unacceptable impacts are observed. An appropriate toilet should be installed.

- The PWS considers that the Wet Cave area should not be allowed to evolve into another developed camping area. The PWS notes that a developed camping area is available 10 km away at Sassafra Creek.

Other blocks – the final plan should clarify that the existing unregulated non-vehicle-based camping on other blocks should continue subject to monitoring and action if unacceptable impacts are observed.

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7. SURFACE KARST WALK AND SELF-GUIDED UNDERGROUND KARST WALK.

The proposed surface karst walk at Honeycomb Cave was supported by only one respondent, with many of the respondents expressing concern re safety and the loss of the cave as a beginners' caving venue. The proposed self-guided underground karst walk was also opposed on safety grounds.

The revised plan should acknowledge that there are significant safety and public liability issues which will need to be addressed in planning the proposed karst walk.

The PWS does not accept that the use of the cave and associated surface karst features for a karst walk necessarily precludes its use as a caving venue; this is an issue that can be resolved with careful planning.

The Honeycomb Cave location has the most spectacular surface karst features but also has potential safety concerns. The Sensation Gorge area contains some interesting, but less spectacular, karst features and fewer apparent safety concerns. The final plan should recommend the investigation of a surface karst walk at either Honeycomb Cave or Sensation Gorge. The final plan should require:

- Identification of options;**
- Risk assessment;**
- An EIS (including impact on existing users) to be prepared and subject to public comment;**
- Monitoring.**

8. ADDITIONAL ENTRANCE TO KING SOLOMONS CAVE.

Some respondents expressed concern that this had been proposed in the press without being specifically prescribed in the draft plan, and appeared to be proceeding with no environmental impact assessment.

This was mentioned in the draft plan (page 65) but was not given particular prominence. Since it clearly has the potential for major environmental impacts as well as substantial modification to the existing use of King Solomons cave, the revised plan will make it clear that it is under consideration. The revised plan should require:

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- Identification of options;

- An EIS and EMP to be prepared and subject to public comment;

- Monitoring.

9. MAPS.

There was some criticism that there was no map in the draft plan to show either the land tenure or the extent of the karst.

The final plan should include two additional maps, one showing the land tenure of the entire area, the other showing the hydrology.

10. CODE OF CONDUCT FOR CAVERS.

Several respondents were keen to see the formalisation of a code of conduct for cavers, but expressed varying opinions concerning the adequacy, or otherwise, of the current Australian Speleological Federation (ASF) Code of Conduct for Tasmanian conditions.

The final plan should recommend the formalisation of a code of conduct for cavers but the PWS considers that the current ASF Code of Conduct is not entirely suitable. It is proposed that this be resolved either by some minor changes to the ASF Code to better reflect Tasmanian conditions, or by the development of a Tasmanian Minimum Impact Caving policy.

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**B. SUMMARY OF INDIVIDUAL REPRESENTATIONS AND DIRECTOR'S
RESPONSE**

INTRODUCTION

Many of the respondents made very lengthy representations, often providing large amounts of background information and going into considerable practical detail about particular caves and issues. The matters raised could be classified into three broad categories:

- Matters relevant to this management plan;
- Detailed matters relevant to management of individual blocks or caves;
- Operational matters.

This summary concentrates on the first category, matters relevant to this management plan. For this reason some of the lengthiest representations have resulted in quite brief summaries. Comments falling into the second category have been noted, to be addressed in detailed site plans for particular blocks, and the third are best dealt with directly by the PWS in its day to day operations.

Most of these submissions are addressed by the general responses in Part A of this document. These are addressed by referring to the appropriate section of Part A, for example: '#6'. Those not covered by the general responses are answered directly, *in italics*.

1. Mr Arthur Clarke.

- Need for joint management with Forestry. #1.

2. Mr John Dickson, Cultural Heritage Development, Officer, TALC.

- More detail needed on Aboriginal Heritage. *Agree – incorporate suggested changes.*

3. Ms Penny Wells, Manager Planning (Conservation & Environment), Forestry Tasmania.

- Plan should not make specific recommendations about tenure changes. # 1.

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4. Mr Andrew Blakesley, Director of Forest Policy, DIER.

- Land tenure changes are a matter for the State Government. Land tenure in this area was considered in the RFA. # 1.

5. Mr Garry Smith, Treasurer, Newcastle & Hunter Valley Speleological Society.

- Oppose Karst walk – would cause safety problems and loss of beginner caving opportunity and displace users to other (more sensitive) caves. # 7.
- Retain existing camping opportunities. # 6.
- Restricted access forces cavers into more sensitive caves. # 5.
- Proposed reduction of Croesus permits too low. # 5.
- More action by karst landowners needed, including restoration of flow to Westmorland Cave. # 1.
- Private and forestry land containing karst should be added to the National Park when feasible. # 1.

6. Mr Ed Murphrey.

- Concern re potential impacts of logging on karst. # 1.
- National Park and Conservation Area should be extended. # 1.

7. Mr Jeff Butt.

- Entire underground karst system should be national park. # 1.
- No commercial operator should have access to restricted access caves. # 5.
- No access possible to some caves due to private land. # 1.

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- Karst walk better located in King Solomon or Marakoopa caves – safety of both caves and visitors. # 7.
- Accreditation system does not work in practice. # 4.
- Proposed restriction of Croesus visits to 12 per year is too low – cannot be justified. # 5.
- Extend the National Park to protect the karst especially the catchments of Croesus and Lynds Caves. # 1.
- Camping should continue at Wet Cave – provide a toilet. # 6.

8. Mr Craig Flowers.

- Landowner. Concerned about water rights and restrictions on land use. # 1.

9. Mr Henry Shannon.

- Location of entrance to Herberts Pot need to be resolved. # 2.
- Distrust of PWS – monitoring is seen as pretext for keeping everyone out. # 4.
- Concerns re restrictions on camping. Put in a toilet and watertank at Wet Cave. # 6.
- Queries description of geological history. *Should be checked and resolved in final plan.*
- Concern at land use changes likely to increase sedimentation – especially ploughing of former pasture. # 1.
- Need for fire management. # 1.
- Allow pet dogs to remain in cars during cave visits. *Agree – revise final plan accordingly, subject to advice from PWS compliance section.*
- Need for weed control program. # 1.

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- Permit system not justified – visitor numbers so low. # 5.
- Interpretation should be developed in consultation with caverneers. *Agree users should be consulted on interpretation - revise final plan accordingly.*
- Restrictions on caving unnecessarily harsh – especially in caves with a long history of use (Wet, Honeycomb & Lynds) – all ‘do-able’ damage has been done long ago. # 5.

10. Ms Deborah Hunter, Wild Cave Tours.

- Main threat to cave ecosystems is vegetation clearance. # 1.
- Need to extend park to provide greater protection. # 1.
- Need to guarantee an environmental flow into Westmorland Cave. # 1.
- Plan needs to address the management of the adjacent Conservation Area. # 1.
- Plan does not adequately cater for cave recreation including tourism. # 5.
- Concern re safety issues beyond the show caves – especially for proposed VSZs. # 7.
- Locking caves and limiting numbers is only a partial solution. # 5.
- Failure to acknowledge caving culture. # 4.
- Turning Honeycomb Cave into a major day use area will remove the traditional beginner caving area. Not compatible with stated aim to preserve the recreational and tourism character of the park. # 7.
- There are three licensed commercial operators, not one. *Correct plan.*
- Plan does not make it clear which zones and caves are available to commercial operators. My business requires the use of restricted access caves. # 5.
- It is unreasonable to blame commercial users for the cumulative impacts of all users of the caves. # 5.

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- Self guided cave tours are incompatible with both show caves and recreational caving. # 7.
- Safety issues associated with a surface karst walk. # 7.
- Oppose VSZ at Wet Cave. # 7.
- Redraw plan – to be followed by another public consultation period. # 2.

11. Mr Iain McCulloch.

Insufficient detail given of proposed developments. # 3.

- Present plan should be withdrawn and rewritten– to be followed by another public consultation period. # 2.
- Author(s) of the plan should be identified. # 2.
- Plan fails to address the fundamental question of maintaining the integrity of the karst and karst processes when the national park does not include many of the karst features, and most of the catchment. # 1.
- Need to guarantee an environmental flow into Westmorland Cave. # 1.
- Concern at phase out of camping at Wet Cave. # 6.
- Potential danger to tourists who are attracted to karst walk. # 7.
- Appalled by rumour of ‘self guided cave tour’ at Honeycomb Cave. # 7.
- Do access restrictions actually control the number entering the cave and is damage actually reduced? # 5.

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- PWS cannot police restrictions – any restrictions need the support of the caving community – prior consultation. Plan should recommend such consultation in future. # 4.

12. Mr Stephen Bunton, President, Southern Tasmanian Caverneers.

- Current national park is woefully inadequate so draft plan has to ignore the greatest threats – agriculture, forestry and mining. # 1.
- Govt should purchase key additional land for the National Park. All relevant Crown Land, Conservation Area and State Forest should be added. No logging in karst catchment. # 1.
- Commercial tours are incompatible with restricted entry status of Croesus Cave. Wet Cave more appropriate for commercial use. # 5.
- Low key camping at wet caves should remain – a toilet and fencing would improve the situation. # 6.
- Concern at safety aspect of encouraging inexperienced visitors into Honeycomb Cave without a Ranger or other guide. # 7.
- There are more appropriate locations than Wet Cave for the karst interpretation walk. # 7.
- Kubla Khan cave – support current access restrictions – ‘approved leader’ system inadequately resourced – proposed limitations are unduly restrictive. # 5, #4.
- Support involvement of volunteers in cave management. # 4.

13. Mr Stephen Bunton.

- Reiterated concerns in submission 12 above.
- Possible impacts of change from agriculture to plantation forestry. # 1.

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14. Mr Greg Middleton, Acting Manager, IPS, DPIWE.

- Need to resolve the land tenure of the entrance to Herberts Pot. # 2.
- Numerous detailed corrections suggested. *Correct plan.*
- Restriction of visits to Kubla Khan Cave need to be better justified. # 5.
- Need for better consultation with cavers. # 4.

15. Mr Steve Harris, Senior Botanist, DPIWE.

- Specific corrections re vegetation. *Correct plan.*

16. Mr Phil Parsons, Convenor, The Environment Association.

- The national park only protects **part of** the karst system. # 1.
- Additional areas should be included in the national park. Government should create underground national park as in NSW. # 1.
- Threat of limestone quarrying not addressed. # 1.
- Failure to mention 23 years of community action that led to reservation. # 4.
- Some of the caves qualify as underground wilderness. # 1.
- Camping should remain at Wet Cave block. # 6.
- Specific comments on science. *Correct plan as appropriate.*
- Self-guided tour: concern re safety issues and combination with recreational caving. # 7.
- Formalise Minimum Impact Caving Code. # 10.
- Concern that numbers restrictions on Croesus will displace users to other caves, just as restrictions on Kubla displaced cavers from Kubla Khan to Croesus. # 5.

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- Croesus needs an ‘approved trip leaders’ scheme. # 4.
- Concern re safety issues with surface karst walk. # 7.
- Environmental flow should be restored to Westmorland Cave. # 1.
- Need for better community engagement. # 4.
- Proposal for a second access to King Solomons Cave should be open to the planning and appeals process. # 8.

17. Mr Nicholas Fitzgerald, Bushcare Vegetation Management Officer, DPIWE.

- Specific corrections re vegetation. *Correct plan.*

18. President, Tas Uni Moles Society.

- Near duplicate of first page of submission 20 – refer to that submission for response.

19. Mr David Wools-Cobb.

- Need for better consultation with caving community. Consultative committee of cave users and management. # 4.
- Need for control of entire karst catchment. Threat of logging in a major catchment of the Sassafras system. # 1.
- Some of the caves qualify as underground wilderness. # 1.
- Retain camping at Wet Cave. Toilet is essential. # 6.
- Karst walk could be a great asset, but safety concerns. # 7.
- Need to acknowledge the full range of wild cave users. # 2.

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- Access rights across private land to several of the caves need to be resolved. # 5.
- Need further detail regarding cave classification. # 2.
- Suggestions re environmental impact/numbers limitations in restricted access caves. # 5.
- Croesus needs an ‘approved trip leaders’ scheme. # 4.
- Need for environmental investigation of proposal for another entrance into King Solomons Cave. # 8.

20. Public Officer, Mole Creek Caving Club.

- Oppose any development at Honeycomb Cave – safety concerns, loss of beginner cave, displacement of visitor use to more sensitive caves. # 7.
- Retain existing camping at Wet Cave and Croesus. # 6.
- Do not gate any more caves. # 5.
- Oppose reduction in Croesus permits. # 5.
- Need for better consultation with caver community. # 4.
- Need for incentives to encourage private landowners to protect karst. # 1.
- Environmental flow should be restored to Westmorland Cave. # 1.
- Need for PWS control of all karst features and catchment. # 1.
- Apply consistent access conditions to all wild cave users, not just the single commercial operator. # 5.
- Need for fuller, more integrated protection of karst landscape in the form of a Great Western Tiers National Park. # 1.

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Additional points from submission 20 only (not contained in 18 or 24)

- Excessive emphasis on general tourism to the exclusion of cavers. # 2.
- Need for adequate PWS staffing to enable active management of caves other than King Solomons and Marakoopa. # 4.
- Access conditions should be consistent across all user groups including school groups and commercial operators. # 5.
- General tourist information should refer to King Solomons and Marakoopa only. *Agree – add plan prescription for liaison with Tourism Tasmania and tourism operators to focus attention on King Solomons and Marakoopa only.*
- Detailed suggestions for the management of the individual blocks. # 3.

21. Mr RA Mann.

- Concerns re water quality - pollution from sources upstream of the caves. # 1.
- Land acquisition recommended. # 1.
- Location of non-tourist caves should not be advertised in any way. *Agree.*
- Kubla Khan access too restrictive. # 5.

22. Mr Stefan Eberhard, Research Officer, Cave Works.

- Specific suggestions re cave fauna conservation and future research. *Correct plan.*

23. Dr Janice March, President, Northern Caverneers Inc.

- The main approach to conservation is simply to restrict access. # 5.
- Need to include catchment areas. # 1.

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- PWS should be more involved in protection of caves and karst features on private land. # 1.
- Plan poorly organised. # 2.
- Caving opportunities increasingly limited due to increasing restrictions by both private landowners and PWS. # 6.
- Retain camping at Wet Cave - provide toilet. # 6.
- No reason why cavers should be excluded from Devils Drainpipe. # 5.
- Gate at Lynds Cave unnecessary - could cause problems. # 5.
- Volunteers should be able to work without direct supervision. # 4.
- Nomenclature - Abseil Hole or Blackberry Hole? # 3.
- Reduction in numbers to Croesus and Lynds not supported by evidence. Need for justification. # 5.
- Need to improve visitor experience at Marakoopa and King Solomons. # 3.
- Prefer adoption of existing ASF code of ethics to the development of a new code. # 10.
- Concerned by proposal for a tunnel to exit King Solomons Cave - should be considered in plan. # 8.
- Need to clarify existence or otherwise of public access to Baldocks, Cyclops and Sassafras Caves. # 2.
- Gate at Diamond Cave not justified. # 5.
- PWS should cooperate more with caving clubs. # 4.
- Oppose provision for PWS staff to accompany any visit to restricted access caves. This could also increase party size beyond the limit. # 5.
- Concerns re access conditions to Kubla Khan and problems with accredited leader scheme. #5, #4.

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- Oppose major visitor centre at Honeycomb Cave - safety concerns. # 7.
- Need for better liaison between PWS, cavers and Mole Creek community - external facilitator? # 4.

24. Dr Michael Lichon.

- Near duplicate of first page of submission 20 – refer to that submission for response.

25. Ms Yoona Welling.

- Concern re safety issues of encouraging access to Honeycomb Cave. # 7.

26. Ms Lorraine O'Keefe, Secretary, Sydney University Speleological Society.

- No comments – request to be kept informed.

27. Mr Nathan Duhig, Scientific Officer, Forest Practices Board.

- Primarily editorial comments. *Correct plan.*

28. Ralph & Barbara Cooper, Birds Tasmania.

- Support 'day use only' at Wet Cave. # 6.
- Note some additional bird species observed within the reserve. *Correct plan.*

**MOLE CREEK KARST NATIONAL PARK
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29. Dr Kevin Kiernan.

- Plan overstates reality when it claims to protect the karst system. # 1.
- Needs to think more broadly to protect the entire karst system. # 1.
- Include Western Tiers Conservation Area in plan. # 1.
- Include Dogs Head Hill reserve in national park. # 1.
- Threat of limestone quarrying is not addressed. # 1.
- Consider the possibility of underground wilderness. # 1.
- Need to protect entire karst catchment. # 1.
- Need for proper procedures prior to construction of second tourist entrance to King Solomons Cave. # 8.
- Plan should be totally rekarst and released again for public comment. # 2.

30. Sally & Noel Martin.

- Concern re liability issues at Wet Cave (Mr & Mrs Martin own the land adjacent to the Wet Cave block and most of the length of the cave is beneath their block). # 1 & #5.
- Problems with relationship with local PWS staff. *Operational matter to be dealt with by PWS District management.*

31. Ms Cathie Plowman, Interpretation Officer, PWS.

- Numerous specific comments, mostly relating to interpretation and the guided tours. *Correct plan.*

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32. Peter Brown, NCB, DPIWE.

- Specific corrections re vegetation. *Correct plan.*

33. National Parks and Wildlife Advisory Council.

Note the statutory role of this council to provide advice direct to the Minister.

- The plan needs to make clear the special nature and values of the park, and to provide for the particular management requirements. #2.
- The plan is poorly organised and fragmented. #2.
- The plan lacks contextual information. #2.
- The plan needs to better address cross-tenure management and land acquisition, particularly the Mill Creek – Kansas Creek system. #1.
- The plan needs to better address conflicting management objectives and analyse the sustainability of recreational use. *Better justification of restrictions on recreational use are to be provided.* #5.

Appendix 3 – List of representors at the hearing

Name	Group/Organisation
Stan Matuszek	Parks and Wildlife Service, Department of Primary Industries, Water and Environment
Roland Eberhard	Earth Sciences Section, Department of Primary Industries, Water and Environment
Ian Houshold	Earth Sciences Section, Department of Primary Industries, Water and Environment
Debbie Hunter	Wild Cave Tours
Phil Parsons	The Environment Association
David Wools-Cobb	
Sally Martin	
Craig Flowers	
Janice March	Northern Tasmanian Caverneers