



Referrals Gateway  
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19 July 2018

Public Comment on Referral:

**Ref: 2018/8177 WILD DRAKE PTY LTD/Tourism and Recreation/Halls Island/Tasmania/Halls Island Standing Camp, Lake Malbena, Tas**

The Tasmanian Land Conservancy (TLC) is a not-for-profit, a-political, registered environmental organisation that owns and manages land of high conservation significance ([tasland.org.au](http://tasland.org.au)). The TLC makes comment on this submission because it owns land that may potentially be impacted by some of the proposed activities.

The TLC's Five Rivers Reserve is located in Tasmania's Central Highlands, approximately 10 km east of Lake St Clair National Park and within 8 km of Lake Malbena. The Reserve is 11,113 hectares in size and protected by a statutory conservation covenant under the *Nature Conservation Act 2000*. It shares boundaries with the Walls of Jerusalem National Park, the Central Plateau Conservation Area, Top Marshes Conservation Area, and the Tasmanian Aboriginal owned *trawtha makuminya*. Part of this Reserve 'Skullbone Plains' also has World Heritage status and is included within the Tasmanian Wilderness World Heritage Area.

More information on the Five Rivers Reserve including its management plan and other associated documents are available at [tasland.org.au/reserves/five-rivers-reserve/](http://tasland.org.au/reserves/five-rivers-reserve/).

**Frequency of Helicopter Use**

The TLC's concern relates to the proposed frequency of helicopter usage as part of Wild Drake Pty Ltd's commercial operations. The usage proposed is:

*"Total flight time from a capacity 30 trip-bookings per year is estimated at a maximum of 48 hours per year. For perspective, a single Halls Island booking would require a maximum of 24 minutes flight time during the arrival process, and 24 minutes maximum flight time some four days later for departure. - Approximately 3 hours of further helicopter use will be required annually for maintenance and servicing of the Standing Camp."*

Submission #3133 [http://epbcnotices.environment.gov.au/\\_entity/annotation/6fdcf222-f732-e811-886f-005056ba00a8/a71d58ad-4cba-48b6-8dab-f3091fc31cd5?t=1531799064613](http://epbcnotices.environment.gov.au/_entity/annotation/6fdcf222-f732-e811-886f-005056ba00a8/a71d58ad-4cba-48b6-8dab-f3091fc31cd5?t=1531799064613))

Our concern relates to the frequency of helicopter use within the proposed flight path and the potential cumulative risk it poses to the Nationally Endangered Tasmanian wedge-tailed eagle *Aquila audax fleayi* on the TLC's adjacent reserve.

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In the “Assessment for Minimum Impact on Nesting Eagles of the Proposed Helicopter Flight Route from Derwent Bridge to Halls Island, Lake Malbena – N. Mooney” the helicopter flight path directly crosses Lake Ina on-route to Halls Island. This route is within 300 m of our Skullbone Plains boundary and within 3 km of other parts of our Five Rivers Reserve. Individual wedge-tailed eagles and pairs of birds are regularly seen foraging over the grasslands of Skullbone Plains with 2 nests located within 12 km of the Lake Ina boundary and several other nests located between 5 and 10 km from Lake Ina on Parks and Wildlife Service and Sustainable Timbers Tasmania land.

Helicopters are known to cause disturbance and can be lethal to eagles due to collision. While the measures proposed by Mooney are to mitigate disturbance, the frequency of helicopter usage (potentially 60 to 70 trips per year) significantly escalates the risk of collision and likelihood of disturbance to this nationally endangered species. This escalation in risk would define ‘frequency of helicopter usage’ as a key threat according to the National recovery plan: *Threatened Species Section (2006).Threatened Tasmanian Eagles Recovery Plan 2006-2010. Department of Primary Industries and Water, Hobart.*

Since taking ownership of the Five Rivers Reserve in 2011, the TLC has utilised helicopters for access from time to time. However, in recognition of the risk aircraft pose to raptors, our current policy is to no longer authorise this mode of access unless for fire or emergency purposes.

### **Consultation**

As a point of clarification, the TLC believes it has not been formally consulted on the Wild Drake Pty Ltd proposed development. While a number of informal disclosures have been made to individual staff, and told about the project including progress of the RAA, the organisation doesn’t not believe this constitutes a formal consultation process. Also, TLC has not been involved in the ongoing planning of the project.

### **Proponent**

The TLC has no arrangement with Wild Drake Pty Ltd. A formal licence agreement with ‘River Fly 1864’ to operate a standing camp on our Five Rivers Reserve is in place. This licence has been in place for six years, and allows for foot access but does not include helicopter use. The execution of this licence is predicated on a range of terms and conditions and reviewed by both parties on an ongoing basis. This commercial agreement with River Fly 1864 has been beneficial to the TLC in mitigating high volumes illegal access which were common at the time of purchased, resulting in significant impacts on the conservation values of the area.

We thank you for the opportunity to comment on this referral.

Sincerely



**James Hattam**

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