

Parks of Kangaroo Island Fire Management Plan 2024

SUMMARY OF SUBMISSIONS

Contents

Introduction.....2

What we heard.....3

 Overview of feedback on content.....4

 Overview of feedback on presentation.....4

 Summary of submissions.....5

Introduction

The Department for Environment and Water (DEW) undertook over 60 engagement activities in the creation of the Parks of Kangaroo Island Fire Management Plan (KI FMP). These activities included information sessions, workshops and meetings with community groups and landholders. The draft KI FMP was released for formal public consultation for 6 weeks from Monday 26 June to Monday 7 August 2023. The public were directed to provide feedback by responding to an online survey.

During the public consultation period, 85 submissions were received. These responses have led to a number of changes to the content and improvements to the presentation of information in the KI FMP. A detailed summary of what we heard and our responses to comments received, including amendments made, is provided in the table below.

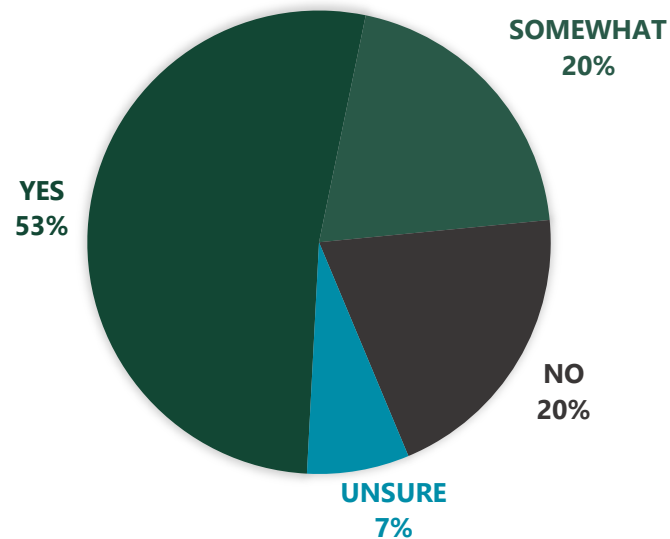
The KI FMP is the first fire management plan to implement reforms put in place by DEW following the 'Black Summer' bushfires of 2019–20. It incorporates an enhanced risk-based approach, placing greater emphasis on spatial information and employing bushfire modelling. Additionally, it uses the State Bushfire Coordination Committee's 2020 *Fire Management Zone Standard and Guidance for Use*. The plan uses digital storytelling (StoryMaps) to give a stronger sense of place while being simpler to use than traditional text-based plans.

What we heard

Residents of 42 suburbs throughout South Australia responded to the formal public consultation survey of the KI FMP, with the majority of respondents living on Kangaroo Island.

Over half (52%) of survey respondents thought that the plan would reduce the risk of bushfires impacting on what is important to them. A further 20% thought the plan would somewhat reduce this risk. 20% did not think the plan would reduce the risk of bushfires impacting on what is important to them and the remaining 7% of respondents were unsure.

DO YOU THINK THIS PARKS OF KANGAROO ISLAND FIRE MANAGEMENT PLAN WILL REDUCE THE RISK OF BUSHFIRES IMPACTING ON WHAT'S IMPORTANT TO YOU?



Overview of feedback on content

High-level feedback on the content of the plan includes:

- Respondents identified key values to be the protection of biodiversity and threatened species as well as protecting lives, livelihoods and communities.
- Respondents requested more clarity on areas that were not zoned and encouraged the addition of more Exclusion Zones to protect unburnt islands of vegetation within the 2019–20 bushfire footprint.
- Community members also highlighted the need to consider the environmental impacts of fire management strategies while reducing risk to the community.

This feedback has led to a number of changes, with additional information included in both the text and strategy map components of the plan, including:

- new information to give more clarity on fire management zones and environmental considerations
- better explanations of how this strategic plan will be implemented
- additional information for each strategy to better explain their purpose.

Overview of feedback on presentation

High-level feedback on the presentation of the plan includes:

- Respondents provided a combination of positive comments and suggestions for improvement regarding the new plan format, which used StoryMaps for the plan and an interactive strategy map for the locations and details of each strategy.
- Respondents made suggestions to improve the symbology used and the distinction between different strategy types on the map.
- Some people experienced difficulties downloading all of the strategy data to enable review of the plan.
- Some respondents found the hyperlinks throughout the plan confusing to navigate.

This feedback, along with new software available since the plan was released for consultation, have enabled a number of improvements to the strategy map and to the plan's presentation, including:

- provision of a downloadable version of the plan (as per previous fire management plans the downloadable version will not contain the strategy map but will include a link to access it)
- improved online help tutorial to use the strategy map

- a simplified process to download data from the strategy map
- reduction of hyperlinks to reduce confusion.

Summary of submissions

Each of the 85 submissions was numbered and the feedback carefully reviewed against 9 criteria.

Feedback that met the following criteria 1–3 resulted in alterations to the plan:

1. provided additional information of direct relevance to management
2. suggested an alternative approach that was considered more appropriate than that proposed in the plan
3. highlighted omissions, inaccuracies or a lack of clarity.

Feedback that met the following criteria 4–9 did not result in alterations to the plan:

4. clearly supported the plan
5. was already addressed in the plan
6. addressed issues beyond the scope of the plan, or recommended the inclusion of detailed or prescriptive information that is not appropriate for a strategic plan of this type
7. proposed an alternative approach but the recommendation of the plan was still considered the most appropriate option
8. was based on incorrect information
9. offered an open statement, or no change was sought.

A summary of all feedback received is provided in the table below. Comments are grouped into feedback received on plan content and feedback received on the format and presentation of the plan, and then further grouped into several identified themes.

The table provides DEW's response to each comment, notes any amendments arising, and lists the relevant criteria the comment met.

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
Feedback on plan content					
General comment					
1	Expressed general comment about bushfire management.	2, 16, 28, 41, 46, 68, 71, 59, 17	No	Noted.	9
2	Expressed general supportive comment about the plan.	1, 9, 18, 25, 31, 32, 34, 39, 44, 45, 47, 55, 57, 59, 63, 3, 27, 82	No	No change required – supportive of plan.	4, 9
3	Expressed general opposing comment about the plan.	13, 28, 75, 76	No	Noted.	9
4	Supported having a single Parks of Kangaroo Island Fire Management Plan.	82	No	No change required – supportive of plan.	4
5	Expressed concern that one plan for all the parks is not sufficient.	78	No	The creation of an island-wide plan recognises that the risks and impacts of a single bushfire are not restricted to a single park or local area in the region. The creation of an island-wide plan enables better coordination of fire management activities across the entire region that considers changing risk profiles, feasibility and resource allocations across an entire management area.	7
6	Expressed concern that the plan lacks detail overall.	62, 75, 82, 85, 87	Yes	This plan sets strategic priorities about where, how and why we need to undertake risk reduction activities and ecological fire management for the Kangaroo Island region. This approach is complemented by detailed program and operational planning completed locally, ensuring that specific, well-defined actions support and enhance the broader strategic vision. Based on the public consultation, additional information will be provided on strategy considerations and zoning justifications. Information on the DEW website will also be reviewed to improve communication of the fire management program.	3

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
Community values					
7	Addressed protecting wildlife, species diversity, ecological function, threatened species, native vegetation, etc.	2, 10, 27, 28, 81, 11, 60, 62, 64, 69, 70, 73, 74, 75, 77, 78, 79, 80, 91	Yes	<p>It is acknowledged that, by aiming to make the plan as readable as possible, there was insufficient detail provided on the complexities around how biodiversity values were considered in formulating strategies. Improvements to the text in the revised plan and the information on the strategy map will be made accordingly.</p> <p>Risk management is fundamental to our approach to managing fire on land managed by DEW. When developing a fire management plan, a project team of park managers, fire managers and ecological experts uses best available data to methodically assess potential bushfire risks and weigh them against the optimal outcomes achievable through fire management strategies. DEW recognises the need to protect environmental values that may be vulnerable to bushfire impacts and/or to some bushfire risk reduction strategies. Mapping that identifies vulnerable species and habitats is maintained to ensure these are considered when identifying appropriate risk reduction strategies in the fire management plan. Outside of strategic fire planning, environmental assets are considered in operational planning of fire management activities through a dedicated environmental assessment. In the event of a bushfire, a specialised Natural Values Team is activated to offer advice and recommendations regarding environmental assets that might be impacted by the fire or by bushfire suppression activities.</p>	3
8	Addressed protecting human lives and communities.	10, 17, 73, 91	No	Noted. National and state policies place priority on the protection of human life (i.e. safety for firefighters and the community). The strategies	9

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
				outlined in the plan are designed to comprehensively address and reduce risk to these values. Our decision-making process is guided by a robust risk-based approach.	
9	Addressed protecting livelihoods, farms and tourism.	10, 17, 62, 77, 91	No	Noted. Strategies identified in the plan already aim to consider and protect these values. Our decision-making process is guided by a robust risk-based approach.	9
10	Addressed protecting property.	73	No	Noted. Strategies identified in the plan already aim to consider and protect these values. Our decision-making process is guided by a robust risk-based approach.	9
11	Addressed protecting cultural values.	13	No	Noted. Strategies identified in the plan already aim to consider and protect these values. Our decision-making process is guided by a robust risk-based approach.	9
Fire management principles					
12	Expressed the opinion that the plan needs to consider Kangaroo Island's significantly different fire history from the mainland and learn from this history and past mistakes.	72, 85, 89	No	The plan already considers the varied fire history of Kangaroo Island. It uses this information, along with bushfire modelling (which includes historical Kangaroo Island weather and local fuel types) and engagement with local people, to learn from local experiences and guide the identification of new strategies.	5
13	Suggested that the plan include the recommendations of the Bushfire Royal Commission (2020) or justify why the recommendations are not being considered.	75, 72	No	Recommendations from the Bushfire Royal Commission, where they apply to DEW, are considered across the statewide fire management program not in individual regional plans.	6
14	Suggested that, to strengthen NPWS's policy standing, key policy positions should be embedded in the plan itself rather than on the NPWS website as	82	Yes	DEW will include additional position statements in the revised plan to provide clarity on overarching policy.	3

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
	general information (as part of Frequently Asked Questions content).				
15	Suggested that more technical information should be embedded in the plan to explain fire behaviour modelling and the testing of the strategies proposed, and to provide an additional level of detail and evidence on which the strategy selection was based.	82	Yes	Additional information on strategy selection will be included in the revised plan.	3
16	Suggested that the plan acknowledge that all fire management strategies have limited effect during extreme fires.	89, 11	No	Rather than adding such information to this plan, the DEW website will include additional information on the limitations of strategies.	6
17	Suggested that the plan provide a range of strategies depending on bushfire intensity, including spotting distances, flame height and intensity.	73, 89	No	Under the <i>Fire and Emergency Services Act 2005</i> , the South Australian Country Fire Service (SACFS) is the control agency for rural bushfire suppression and determines suitable suppression tactics during bushfire incidents. Through this plan, an improved track network for better access, fuel breaks to provide safer working areas, and reduced fuel zones to reduce fire intensity all contribute to providing more opportunities for successful suppression of bushfires in a wider range of weather conditions.	5
18	Supported controlling spot fires promptly and responding quickly.	7, 91	No	Noted. Strategies identified in the plan will increase opportunities for early suppression of bushfire. Under the <i>Fire and Emergency Services Act 2005</i> , SACFS is the control agency for rural bushfire suppression and determines suitable suppression tactics during bushfire incidents.	9
19	Expressed a preference for bushfires to be managed locally rather than controlled from the mainland.	28	No	Outside the scope of this plan. Under the <i>Fire and Emergency Services Act 2005</i> , SACFS is the control agency for South Australia's bushfire response; therefore, the policies of SACFS determine how incidents are managed.	6

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
20	Expressed the view that NPWS should acknowledge that some big bushfires are not possible to stop and should encourage the public to take responsibility to protect themselves, prepare for bushfires and arrange insurance, rather than expecting this plan to protect them.	89	No	Noted.	6
21	Stated that the plan should be SMART (specific, measurable, achievable, relevant and time-bound).	89	No	Many aspects of the plan are already considered to meet SMART criteria. The strategies are <i>specific</i> , especially in terms of their mapped location. The plan specifies <i>measurable</i> operational targets. The type and timing of the strategies considers their feasibility, aiming to make targets <i>achievable</i> . The plan is <i>time-bound</i> , lasting for 10 years, giving indicative time constraints for delivery while allowing flexibility based on future knowledge and resource developments.	5
22	Suggested that the plan should better acknowledge human-caused bushfires and should include strategies around awareness and education to prevent these.	75	No	Noted. DEW works closely with SACFS in making information on bushfire prevention available to the public.	6
23	Suggested providing strategies for currently unzoned areas.	10, 14	Yes	No fuel reduction or other bushfire risk mitigation activities will occur in the unzoned areas in the plan. Also, these areas have not been deemed Conservation Zones as no specific environmental objectives requiring active fire management activities were identified as being required or feasible. It is possible that zoning of these areas may be changed in the future during a formal review process considering research, risk analysis or landscape changes. However, in the absence of zoning, activities must be undertaken in accordance with the principles and regulations of DEW, the	3

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
				<i>Native Vegetation Act 1991, Fire and Emergency Services Act 2005 and the DEW Ecological Fire Management Guidelines.</i> Additional explanation of unzoned areas will be included in the revised plan.	
24	Suggested providing additional detail for how each zone and strategy is implemented.	73, 76, 79, 78	Yes	Additional general information on implementation will be added to the revised plan. This plan identifies areas where future management activities will take place to reduce risk of bushfire to life, property and the environment. As a strategic plan, it provides guidance to regional staff while allowing them to determine the best way to achieve the desired risk reduction outcomes, based on environmental assessments, feasibility considerations and resource availability. The guiding principles for each zone type are outlined in the <i>Fire Management Zone Standard and Guidance for Use</i> , developed by the State Bushfire Coordination Committee; these guide staff on the desired outcomes for each zone. Program and annual planning will determine the details of specific timeframes and operational delivery of the plan.	3
25	Expressed concern that information on ecological values being managed by Conservation Zones is not explained or shown.	10	Yes	The plan has been amended to improve the information provided regarding ecological values in Conservation Zones.	3
26	Expressed the view that the plan needs to take a different approach in different areas depending on rainfall.	69	No	The plan already includes the need for different approaches in different areas. As a regional plan, it identifies broad strategies to achieve a risk reduction outcome. The implementation of those strategies then requires local operational planning, considering local vegetation types, vegetation structure and local conditions, and approaching different sites based on their individual circumstances. For example, vegetation types and	5

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
				their recovery rate will vary based on rainfall averages as well as the impact of droughts or frequent flooding.	
Fire management zones					
27	Supported the fire management zone concept.	7, 12, 42, 43, 44	No	No change required – supportive of plan.	4, 9
28	Supported the use of Exclusion Zones.	37, 43	No	No change required – supportive of plan.	4, 9
29	Suggested implementing more Exclusion Zones, especially in those areas important for threatened species and unburnt patches of vegetation from the 2019–20 fire scar.	8, 10, 62, 73, 74, 75, 78, 79, 83	Yes	The plan has been amended to create additional Exclusion Zones in Flinders Chase National Park, Ravine des Casoars Wilderness Protection Area and Vivonne Bay Conservation Park, around significant unburnt vegetation islands within the 2019–20 bushfire footprint.	2
30	Supported the plan in relation to Flinders Chase National Park.	91	No	No change required – supportive of plan.	4
31	Supported inclusion of Exclusion Zones within long-unburnt areas of habitat in the Ravine des Casoars Wilderness Protection Area (RADE_E01, RADE_E03).	74	Yes	The plan has been amended to create an additional Exclusion Zone on the boundary of Flinders Chase National Park and Ravine des Casoars Wilderness Protection Area around significant unburnt vegetation islands within the 2019–20 bushfire footprint.	4

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
32	Opposed proposed fire management strategies (fire tracks and burning) in wilderness protection areas and Flinders Chase National Park; expressed the belief that these are a threat to biodiversity, will not achieve objectives and should be Exclusion Zones (including RADE_FA01, RADE_FA02, RADE_FA03, RADE_FA04, RADE_FB06, RADE_S01, RADE_S05, RADE_FA01, RADE_FB08, RADE_FB09, RADE_FB04, FLCH_S05, FLCH_S03, FLCH_S04, CAGA_C01, CAGA_S01, SEBA_C01 and SEBA_C02).	72, 79, 80	No	<p>While DEW understands and appreciates the commitment to biodiversity, it is important to highlight that the proposed fire tracks and fire management zones that facilitate prescribed burning are a result of a thorough risk assessment. The highest priority in our fire management plan is the reduction of bushfire risk to life followed by property and the environment.. The strategies in question have been identified as essential to reducing the significant bushfire risk to these priorities.</p> <p>The decision to implement these strategies is not taken lightly. The unique characteristics of the landscape and the input from topic specialists and key stakeholders have been carefully considered to ensure that the strategies are both effective and necessary. We have explored alternative measures extensively, including Exclusion Zones, and determined that the proposed strategies are the most viable options for minimising risks from bushfire.</p> <p>We acknowledge that prioritising these strategies may come at the expense of other considerations, but our commitment is to the most effective means of reducing bushfire risk. A continued commitment to adaptive management will be integral to implementation, ensuring that we 'learn as we go' to build on existing knowledge, and ensure that the strategies align with our objectives while minimising any impacts on biodiversity.</p>	7

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
33	Expressed concern that the plan does not address protection of the conservation enclosure / refuge on the eastern boundary of the Western River Wilderness Protection Area.	76, 81	No	DEW acknowledges the importance of the species identified within the enclosure area but also acknowledges that further surveys since the 2019–20 bushfires have identified species, such as the Kangaroo Island dunnart, in greater numbers than previously known in other areas of western Kangaroo Island. As bushfire modelling identified other areas across the island at higher risk, those areas need to be the focus to reduce the risk of landscape bushfires and bushfires impacting multiple assets, including environmental assets.	7
34	Expressed concern that the lack of intervention strategies in Cape Torrens and Western River Wilderness Protection Areas and in Latham Conservation Park increase the risk for them.	91	No	The Bushfire Buffer Zones in Western River Wilderness Protection Area will be maintained as per the existing fire management plan and are deemed adequate to manage bushfire risk in the immediate vicinity of the park, based on bushfire modelling scenarios. The inclusion of a new fuel break along the southern and south-eastern edge of Latham Conservation Park aims to assist in reducing the risk of fire movement into or out of the park. The modelled bushfire risk from fires starting within Cape Torrens Wilderness Protection Area does not justify identification of mitigation strategies inside that wilderness area, in contrast to the Ravine des Casoars Wilderness Protection Area where landscape-impacting bushfires pose a greater risk.	7
35	Opposed the use of the term 'Conservation Zone' and expressed the view that this is misleading because it does not mean good environmental outcomes are achieved.	73, 75	No	Conservation Zones are defined by the <i>Fire Management Zone Standard and Guidance for Use</i> , developed by the State Bushfire Coordination Committee. Fire management activities in this zone are undertaken to assist in the conservation of specific environmental assets.	6

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
36	Opposed Conservation Zones (e.g. CAGA_C01, SEBA_C01 and SEBA_C02) and expressed the view that these do not support conservation.	78, 85	No	Conservation Zones are defined by the <i>Fire Management Zone Standard and Guidance for Use</i> , developed by the State Bushfire Coordination Committee. Fire management activities in this zone are undertaken to assist in the conservation of specific environmental assets.	8
37	Expressed concern that wilderness protection areas, Gosse Lands, Cape Gantheaume and eastern parks are Strategic Fuel Management Zones instead of Conservation Zones, which is more aligned to wilderness protection.	73, 79	No	As defined by the <i>Fire Management Zone Standard and Guidance for Use</i> developed by the State Bushfire Coordination Committee, Strategic Fuel Management Zones (S-zones) are used where the aim is to reduce bushfire risk to life, property or the environment. Risk assessments have indicated that fires starting in or adjacent to these areas pose a high risk and that S-zones, in combination with other strategies, can help to reduce this risk. S-zones allow for a more flexible approach, aiming to reduce environmental impacts from repeatedly burning the same area. Conservation Zones are applied where fire management activities are undertaken to assist in the conservation of specific environmental assets, so they are not suitable in this context.	8
38	Expressed a preference for the Ravine des Casoars Wilderness Protection Area to be broken into smaller management areas.	42	No	No change required – supportive of plan.	4

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
39	Opposed Strategic Fuel Management Zones in Ravine De Casoars Wilderness Protection Area, Cape Gantheaume Wilderness Protection Area and Flinders Chase NP (RADE_S01, RADE_SO2, RADE_S05, FLCH_S05, FLCH_S03, FLCH_S04, FLCH_S05, CAGA_S01).	78, 83, 85	No	As defined by the <i>Fire Management Zone Standard and Guidance for Use</i> developed by the State Bushfire Coordination Committee, Strategic Fuel Management Zones (S-zones) are used where the aim is to reduce bushfire risk to life, property or the environment. Risk assessments have indicated that fires starting in or adjacent to these areas pose a high risk and that S-zones, in combination with other strategies, can help to reduce this risk. Previous alternative strategies used in the wilderness protection areas were Bushfire Buffer Zones, which require repeated burning when fuel reaches a particular threshold. S-zones allow for a more flexible approach, aiming to reduce environmental impacts from repeatedly burning the same area.	9
40	Expressed the opinion that FLCH_A01 Remarkable Rocks boardwalk/carpark and FLCH_SO2 Cape du Couedic Precinct is not required as bushfires will be moving north.	72, 85	No	DEW recognises the potential for ignition from the south; however, landscape bushfires typically pose a risk from the north in this location.	7

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
41	Expressed concern about unzoned areas and the lack of explanation of why these areas are unzoned and how they will be managed.	64, 75, 78, 80, 83	Yes	<p>Additional explanation of unzoned areas will be included in the plan.</p> <p>The unzoned areas in the plan are not managed for risk mitigation as the bushfire risk to life, property and the environment was considered low or was addressed by adjacent strategies. Also, they have not been deemed Conservation Zones as no specific environmental objectives requiring active fire management activities were identified as required or feasible. It is possible that zoning of these areas may be changed in the future in response to research, risk analysis or landscape changes. However, in the absence of zoning, activities undertaken must be in accordance with the departmental principles and regulations, the <i>Native Vegetation Act 1991</i>, <i>Fire and Emergency Services Act 2005</i> and <i>DEW Ecological Fire Management Guidelines</i>.</p>	3
42	Suggested extending fire management over the entire park estate; also suggested that, other than Asset Protection Zones and firebreaks, the plan should not limit fire management to specific zones.	10, 14	Yes	<p>Additional explanation of unzoned areas will be included in the plan.</p> <p>Fire management is considered over the entire park estate. Our strategies are located in the most effective areas, ensuring a proactive and targeted approach to prevent potential bushfire risks. Due to resource constraints and the need for strategic prioritisation, it is not feasible to identify strategies in all areas; therefore, our focus is on optimising effectiveness in priority zones.</p> <p>The unzoned areas in the plan are not managed for risk mitigation as the bushfire risk to life, property and the environment was considered low or was addressed by adjacent strategies. Also, they have not been deemed Conservation Zones as no specific environmental objectives requiring active fire management activities were identified as</p>	3

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
				required or feasible. It is possible that zoning of these areas may be changed in the future in response to research, risk analysis or landscape changes. However, in the absence of zoning, activities undertaken must be in accordance with departmental principles and regulations, the <i>Native Vegetation Act 1991</i> , <i>Fire and Emergency Services Act 2005</i> and DEW <i>Ecological Fire Management Guidelines</i> .	
43	Suggested providing additional detail regarding the strategy proposed for grey zones.	75	Yes	The grey areas on the map are not strategies, they depict protected areas (national parks, wilderness protection areas) or relevant Crown land. The map legend will be highlighted to clarify that grey areas are not zones.	3
44	Expressed a preference for wider buffer areas.	19	No	The width of Bushfire Buffer Zones is guided by the <i>Fire Management Zone Standard and Guidance for Use</i> developed by the State Bushfire Coordination Committee, and by the desired outcome of the mitigation strategy identified by the regional planning team. Zones aim to reach a balance between reducing risk effectively while considering impacts to the environment.	7
45	Supported Asset Protection Zones, Strategic Risk Management Zones and some Bushfire Buffer Zones and expressed the belief these are the most effective fire management strategy; however, also expressed concern that the government uses incorrect terminology when referring to Strategic Fuel Management Zones.	87	No	Noted. DEW identifies Strategic Fuel Management Zones rather than Strategic Risk Management Zones as this is the approved terminology in the <i>Fire Management Zone Standard and Guidance for Use</i> , developed by the State Bushfire Coordination Committee.	9

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
46	Expressed a desire for more detail regarding the duration of protection for the Exclusion Zone in the Ravine des Casoars Wilderness Protection Area.	74	Yes	The detailed objective states that the Exclusion Zone will be reviewed in line with the full review of the fire management plan. The text in the plan will be revised to be clearer on the planned exclusion period.	3
Fuel breaks and fire access tracks					
47	Suggested a specific fuel break adjacent to Range Track and Younghusband Track.	20	No	DEW believes that the fuel breaks east and west of these tracks are strategically appropriate for landscape-scale fire. The project team does not consider that additional breaks are required.	7
48	Expressed a desire for more fire access tracks than those proposed in the plan and for the maintenance of existing tracks.	15, 3, 16, 27, 17, 82	No	Noted. The existing track network and new fire access tracks will effectively increase DEW's ability to implement the strategies in this plan while also providing better suppression opportunities for bushfires within the reserve system.	7
49	Supported firebreaks.	3, 19, 22, 65, 91	No	No change required – supportive of plan.	4
50	Supported the creation of firebreaks.	15, 20, 23, 36, 38, 39, 43, 51, 58, 65, 66, 22	No	No change required – supportive of plan.	4
51	Opposed firebreaks.	8, 69, 72, 73, 74, 77, 78	No	Firebreaks (or fuel breaks) are one of a series of strategies and treatments that fire managers use to facilitate and enhance the preparedness and response capacity of fire response agencies. When considered in a strategic context and combined with other risk mitigation strategies, fuel breaks can enhance the range of bushfire response and suppression strategies and tactics available to the control agency, which can lead to an increased probability of successful suppression. Fuel breaks support DEW meeting its obligations under the <i>Fire and Emergency Services Act 2005</i> . Most fuel breaks identified in this plan will increase the feasibility of prescribed burning and	7

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
				increase back-burning opportunities during a bushfire response.	
52	Opposed new access tracks and firebreaks, especially in Ravine des Casoars Wilderness Protection Area, due to ecological impacts (RADE_FA01, RADE_FB08, RADE_FB09, RADE_FB04).	83, 75, 85, 74, 78	No	DEW acknowledges the ecological impacts of fire access tracks and fuel breaks but deems them essential for reducing the risk from bushfire to life, property and the environment. Large, high-intensity fires at decreased intervals will also have significant impacts on biodiversity. The access tracks in Ravine des Casoars Wilderness Protection Area will increase the feasibility of prescribed burning and will enable more rapid response to bushfires, which will assist in early suppression. To reduce additional disturbance, the fire access tracks in the wilderness protection area aim to use approximately 31 km of existing clearance from bulldozer breaks during the 2019–20 bushfires.	7
53	Expressed concern that the width of access tracks / firebreaks is not specified (applies to all access track / firebreak unique IDs).	74, 78, 85	Yes	The width of fuel breaks is visible in the strategy map pop-up window, viewed by selecting the specific break on the strategy map in the plan. Better clarity can be seen by zooming in to the strategy map, as the width depicted on the map reflects the actual width in the landscape. DEW will investigate improving map usability and visibility. The width of the fire access tracks is determined by the track classification as defined in the <i>South Australian Firebreaks, Fire Access Track and Sign Standards Guidelines</i> . The classification of existing tracks is available on the Fire Management Maps webpage. The plan only describes changes to the track network.	3

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
54	Supported upgrading the Melrose Track into a fuel break to stop fires travelling north into the wilderness protection area, given this is an existing track.	78, 85	No	Noted support. The Melrose Track forms an important component in influencing fire spread from north to south and south to north. DEW does not consider that this break alone will effectively mitigate bushfire risks for this part of Kangaroo Island; therefore, it will be supported by additional fuel breaks and access tracks to the north.	4
55	Supported maintaining a fuel break along Shackle Road.	85	No	No change required – supportive of plan.	4
56	Suggested that maps be updated with the current status of tracks and current track works.	78	No	Reporting on track status and current works being undertaken is outside the scope of this plan.	6
57	Requested further details be provided about the downgrade proposed for FLCH_FA03 SWER cut-through.	72, 78	No	The SWER cut-throughs enable maintenance of the electricity infrastructure but are not maintained to a dedicated fire access track standard. The downgrade noted in the plan is to ensure that this is updated in government maps and to be clear on fire management infrastructure maintenance priorities. The unaffected cut-throughs along this SWER-line are dual purpose or essential for management, such as accessing Maupertuis Track or diverting around a sand dune.	9

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
58	Expressed a desire for fewer firebreaks.	74, 75	No	<p>Firebreaks (or fuel breaks) are one of a series of strategies and treatments that fire managers use to facilitate and enhance the preparedness and response capacity of fire management agencies. When considered in a strategic context and combined with other risk mitigation strategies, fuel breaks can enhance the range of bushfire response and suppression strategies and tactics available to the control agency, which can lead to an increased probability of successful suppression. Fuel breaks support DEW meeting its obligations under the <i>Fire and Emergency Services Act 2005</i>.</p>	7
59	Opposed DUDL_FB08 firebreak in Dudley Conservation Park due to wipe-out of species (<i>Melaleuca lanceolata</i>) from too frequent burning.	69	No	<p>Fire management activities in Dudley Conservation Park are focused on reducing the risk of landscape-scale bushfires moving through or out of the park and impacting on nearby people, assets and farmland. The fuel break and Bushfire Buffer Zone through the park will provide suppression opportunities to prevent spread of fires through the entire park as well as through the contiguous vegetation outside of the park in a single event, such as the 3,000-ha bushfire experienced in 2006. Following approval of the <i>Dudley Peninsula Fire Management Plan</i> in 2020, approximately 300 ha of prescribed burning has taken place within the 2006 bushfire footprint to create this buffer. Although species such as <i>Melaleuca lanceolata</i> are known to resprout following fire events, DEW recognises that frequent fires at short intervals will have a detrimental impact and will reduce their ability to recover. Any activities undertaken will consider the environmental impacts and fire regime to reduce impacts where possible. The use of Strategic Fuel Management Zones provides</p>	7

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
				flexibility to reduce bushfire risk while reducing environmental impacts, by undertaking burns at more tolerable fire intervals based on the vital attributes of species within the zone; this is in contrast to Bushfire Buffer Zones, where prescribed burn frequency is guided by fuel accumulation within the zone.	
60	Suggested implementing fire access tracks and firebreaks in the earliest possible implementation phase of the plan.	24, 37, 82	No	The phases outlined in the plan were determined based on a combination of existing and developing risk profiles, alignment with the implementation of supporting strategies, and resourcing considerations. The phases are not prescriptive and allow flexibility based on changes in resource availability and risk.	7
61	Supported maintaining firebreaks / buffer zones / Asset Protection Zones.	3, 19, 22, 27, 28, 41, 68, 81, 82	No	No change required – supportive of plan.	4
62	Supported access tracks.	3, 16, 91	No	No change required – supportive of plan.	4
63	Supported new and upgraded fire access tracks.	15, 20, 21, 25, 33, 37, 43, 44, 45, 48, 49, 50, 51, 53, 54, 56, 57, 58, 65, 66, 16, 19, 46	No	No change required – supportive of plan.	4
64	Supported fire access tracks in the Ravine des Casoars Wilderness Protection Area.	20, 65	No	No change required – supportive of plan.	4
65	Supported fire access tracks in Flinders Chase National Park.	50	No	No change required – supportive of plan.	4
66	Supported more access tracks.	15, 16, 17, 65	No	No change required – supportive of plan.	4

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
67	Opposed fire access tracks.	72, 73, 74, 77, 79	No	When considered in a strategic context and combined with other risk mitigation strategies, fire access tracks can enhance the range of bushfire response strategies and tactics available to the control agency. Fire access tracks provide rapid access and safe operating space and enable other fire management activities (such as prescribed burning), thereby contributing to increased success in suppressing a bushfire. Improving the fire access track network supports DEW meeting its obligations under the <i>Fire and Emergency Services Act 2005</i> .	7
68	Opposed new fire access tracks, especially in wilderness protection areas, for various reasons including fragmentation, edge effects, spread of pest plants and animals and <i>Phytophthora</i> , and ineffectiveness.	72, 73, 74	No	DEW acknowledges the environmental impacts of fire access tracks and fuel breaks but deems them essential for reducing the bushfire risk to life, property and the environment. Strategies will be implemented to reduce the risk of pest incursions and spread, including the use of washdown procedures, restricting access by installing gates and implementing seasonal track closures. When considered in a strategic context and combined with other risk mitigation strategies, increased access for DEW staff and emergency services personnel can enhance and expand the range of bushfire response strategies and tactics available to the control agency. Fire access tracks provide rapid access and safe operating space and enable other fire management activities (such as prescribed burning), and have thereby been successfully used to facilitate fire suppression and halt fire spread. While beyond the scope of strategic fire planning, environmental assets are also addressed during	7

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
				operational planning through an environmental assessment.	
69	Suggested providing additional detail regarding 'sensitive and sustainable design' of access tracks.	73	Yes	Wording in the plan will be amended.	3
70	Expressed a desire for fewer or no access tracks in wilderness areas.	62, 71, 72, 74, 75, 79	No	<p>Providing access, when considered in a strategic context and combined with other risk mitigation strategies, can enhance the range of bushfire response strategies and tactics available to the control agency. Fire access tracks provide rapid access and safe operating space and enable other fire management activities (such as prescribed burning), thereby contributing to an increased probability of successful suppression. Improving the fire access track network supports DEW meeting its obligations under the <i>Fire and Emergency Services Act 2005</i>.</p> <p>The fire management plan has removed one of the approved tracks in the Parks of Western Kangaroo Island Park Management Plan, following additional feasibility studies. Any parts of the 2019–20 bulldozer lines not used as part of the upgraded track network will be rehabilitated in accordance with the <i>Wilderness Protection Areas and Zones Code of Management</i>.</p>	7
71	Expressed concern that existing tracks are not maintained and many are inaccessible, and that new tracks will have the same issues.	78	No	Noted. DEW recognises the ongoing costs associated with maintaining the fire access track network. The plan also identifies tracks for closure or downgrade. Annual auditing and planning aim to prioritise and rectify issues across the track network as they arise, to maintain critical infrastructure.	9

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
72	Opposed the reduced fuel load buffer zone of almost 1,000 m width proposed for Cape Bouguer Wilderness Protection Area (CABO_BO1).	78	Yes	CABO_BO1 width will be reduced to 500 m to align with other similar breaks on western Kangaroo Island.	2
73	Supported RADE_FBO5 and RADE_FBO8 adjacent to West Melrose Track as this is an existing track that bounds Flinders Chase National Park; suggested the Unique ID is Changed to FL_CH.	78	No	The identified fuel break will extend into Ravine des Casoars Wilderness Protection Area so the name is appropriate to highlight the wilderness protection area.	4, 7
74	Opposed fire access tracks and firebreaks in Ravine des Casoars Wilderness Protection Area (RADE_FA01, RADE_FB02, RADE_FB06, RADE_FB08, RADE_FB09, RADE_FB04).	78	No	Providing access, when considered in a strategic context and combined with other risk mitigation strategies, can enhance the range of bushfire response strategies and tactics available to the control agency. Fire access tracks provide rapid access and safe operating space and enable other preventative works (such as the creation of fuel breaks or prescribed burning), thereby contributing to an increased probability of successful suppression. Improving the fire access track network supports DEW meeting its obligations under the <i>Fire and Emergency Services Act 2005</i> .	7
75	Opposed Bushfire Buffer Zones unless they are on existing tracks, do not exceed 25 m internally and 50 m externally, and adjacent roads/tracks or other cleared lands are included in this distance (FLCH_B02, FLCH_B05, SEBA_B02, SEBA_FB05, CAGA_B01, WERI_BO2).	78	No	Bushfire Buffer Zones as per <i>Fire Management Zone Standard and Guidance for Use</i> , developed by the State Bushfire Coordination Committee, are typically greater than 500 m in width and are aimed at reducing bushfire risk to life, property and the environment through the management of fuel loads. Most of those identified in the plan are 500 m and will involve prescribed burning to manage the fuel load. Of strategies outlined in the plan, fuel breaks are more aligned with the widths suggested in the comment and these have been identified alongside fire access tracks to support both prescribed burning and bushfire suppression.	7

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
76	Expressed a preference that the path of FLCH_FB11 is influenced by reducing the impact on native systems.	23	No	No change required. Environmental assessments are required prior to the implementation of fuel breaks and these aim to identify and mitigate impacts where possible. FLCH_FB11 is considered an important north–south break for fire management but it can be modified at the implementation stage based on the outcomes of the environmental assessment.	7
77	Expressed concern that the width of access tracks and firebreaks are not specified in the strategy map, that they are confusingly overlaid on top of each other, and that misleading symbols are used (including FLCH_B02, FLCH_B05, CABO_B01, SEBA_B02, SEBA_FB05, CAGA_B01, WERI_B02, RADE_FB07, RADE_S02, RADE_FB02).	72, 74	Yes	The width of fuel breaks is visible in the strategy map pop-up window, viewed by selecting a specific fuel break. Better clarity can be seen by zooming in to the map to see the actual width of fuel breaks in the landscape. DEW will aim to improve the strategy map's usability and visibility and create a tutorial for map users. The width of the fire access tracks is determined by the track classification as defined in the <i>South Australian Firebreaks, Fire Access Track and Sign Standards Guidelines</i> . Classification of existing tracks is available on the Fire Management Maps website. The plan only describes changes to the track network.	3
Plan implementation					
78	Expressed concern about the lack of detail as to how strategies will be maintained and what the priorities are.	87	No	The implementation and maintenance of all strategies is managed by the region through the development of local program and operational plans and subsequent ongoing fire management program funding. The specific timing for the implementation of each strategy will be determined by the region when creating program plans (1–5 years) and operational plans (annual). The Parks of Kangaroo Island Fire Management Plan provides guidance to staff on this by assigning commencement phases to each strategy.	6

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
79	Expressed concern that actions are too long term, with not enough immediate actions.	17	No	The phases outlined in the plan were determined based on a combination of existing and developing risk profiles, alignment with implementation of supporting strategies, and resourcing considerations. The phases are not prescriptive and allow flexibility based on changes in resource availability and risk. Actions are spread over the life of the plan, including many identified for the initial 5 years of the plan.	7
80	Suggested specifying the frequency of strategies.	19, 87	No	Maintenance of tracks and fuel breaks occurs as required. Frequency of treatments in different zones is driven by the requirements of each zone; for example, in Asset Protection Zones it is required to maintain average fuel loads throughout the zone at moderate or lower. When this threshold is exceeded, work should be undertaken to reduce fuel loads again. Different vegetation types and local weather patterns mean that fuel accumulates at different rates, so the frequency of treatment for all strategies is considered on an individual basis.	6
81	Expressed the view that the 5-year update schedule for the plan is not frequent enough to incorporate emerging monitoring data and research.	52, 67	No	The 5-year update will consider high-level changes to the plan. Program plans, environmental assessments and annual implementation will continue to incorporate emerging data and research as part of an adaptive management approach to fire management.	8
Prescribed burning					
82	Supported prescribed burning / fuel reduction burning.	2, 5, 7, 15, 16, 20, 21, 25, 26, 29, 30, 36, 37, 39, 40, 43, 44, 50, 10, 71, 89, 91	No	No change required – supportive of plan.	4, 9
83	Supported prescribed burning in Flinders Chase National Park.	29, 37, 50, 81	No	No change required – supportive of plan.	4, 9

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
84	Supported consideration being given to habitat age and the ability to burn for conservation purposes as well as fire management purposes.	20, 39, 40, 43, 14	No	No change required – supportive of plan.	9
85	Opposed prescribed burning.	8, 60, 62, 69, 72, 75, 74, 78	No	<p>Reducing fuel loads through prescribed burning, when considered in a strategic context and combined with other risk mitigation strategies, can enhance the range of bushfire response strategies and tactics available to the control agency, thereby contributing to an increased probability of successful bushfire suppression. Prescribed burning is an important tool in reducing spread and intensity of bushfires to enable successful suppression by the control agency. It recognises that weather varies throughout the course of large-scale campaign bushfires and that smaller fires in early stages have lower intensity, Prescribed burning supports DEW meeting its obligations under the <i>Fire and Emergency Services Act 2005</i>.</p> <p>When applied as a controlled and planned process, prescribed burning mirrors natural ecological processes. It is considered one of the most environmentally sensitive methods for managing the environment and reducing fuel loads. DEW also has a role in protecting, maintaining and enhancing biodiversity and this includes ensuring that appropriate fire regimes are maintained to meet the needs of native species.</p>	7

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
86	Expressed a desire for less or no prescribed burning.	60, 64, 72, 74, 75, 79	No	DEW believes the strategies identified, which may enable prescribed burning, are required to address high bushfire risks, based on bushfire risk assessments for life, property and the environment as well as in Conservation Zones for conservation focused fire management. Other factors considered in identifying strategies include changing risk profiles over time, feasibility of implementation, resourcing and environmental assessments.	7
87	Expressed a desire for more prescribed burning.	2, 10, 14, 19, 27, 41, 71, 17, 59, 89	No	DEW believes the identified strategies, which may enable prescribed burning, are adequate to address high risk areas, based on bushfire risk assessments for life, property and the environment as well as in Conservation Zones for conservation focused fire management. Other factors considered in identifying future strategies include changing risk profiles over time, feasibility of implementation, resourcing and environmental assessments.	7
88	Expressed the view that prescribed burning may not be the most effective or scientifically proven approach and should be properly monitored and assessed to check that it is not making some situations worse.	78, 87	No	DEW acknowledges that prescribed burning is not suited to all situations and that it does not completely reduce the risk of bushfires. DEW uses prescribed burning in partnership with other risk mitigation strategies to maximise the bushfire risk reduction potential. The Overview of prescribed burning in Australasia , developed by the Australasian Fire and Emergency Service Authorities Council (AFAC), notes on page 27 that 'while there is a growing base of peer-reviewed scientific papers quantifying the effectiveness of prescribed burning, it is also important to consider the decades of unpublished applied research and documented case studies undertaken in-house by government scientists working for Australian land and fire agencies (including the CSIRO). When applied research and case studies are considered,	7

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
				it becomes clear that there is a significant body of knowledge which constitutes a compelling case that prescribed burning can play an important role in mitigating bushfire frequency, extent and damage’.	
89	Expressed the view that the plan should acknowledge the negative impact of prescribed burning on the environment and its limited effectiveness in preventing fire spread.	8, 69, 72, 73, 74	No	DEW acknowledges that prescribed burning is not suited to all situations and that it does not completely reduce the risk of bushfires. DEW uses prescribed burning in partnership with other risk mitigation strategies to maximise the bushfire risk reduction potential. While prescribed burning has the potential to cause environmental impacts, fire also has an important ecological role in Australia and DEW strives to use prescribed burning wherever possible to protect and maintain biodiversity values while also managing bushfire risk to life and property	6
90	Suggested that the plan will initiate prescribed burning where it has not occurred before (in wilderness protection areas) and that evidence should be required to support this change in management.	74	No	Prescribed burning has been undertaken in wilderness protection areas across South Australia since at least 2004. Prescribed burns have occurred in the Ravine des Casoars, Cape Gantheaume, Western River and Cape Bouguer wilderness protection areas in accordance with zoning in previous fire management plans, forming part of essential bushfire risk management practices.	8
91	Suggested using smaller areas for prescribed burning to get a more complex mosaic pattern.	10, 14, 19	No	Methods of prescribed burning are carefully planned in the context of the landscape to optimise results. The zoning in the plan outlines the broad area within which treatments will occur and the overall objective of the zoned area. Operational considerations, including factors such as environmental impacts, season, access, landforms and fire history, contribute to the design of individual burns. For example, a single Bushfire	7

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
				Buffer Zone may be implemented using 4 individual burns over 4 years.	
92	Suggested using larger areas for prescribed burning.	71	No	Methods of prescribed burning are carefully planned in the context of the landscape to optimise results. DEW believes the Strategic Fuel Management Zones allow adequate space for large burns but the intent is not to burn the zones in their entirety. Instead, the size of the zones allows DEW to use natural features and undertake a series of burns over time to create fuel-reduced areas. Burning large tracts such as the 10,000 ha suggested in the feedback is not considered desirable or feasible in this landscape and instead a staged approach enabled through Strategic Fuel Management Zones is preferable.	7
93	Suggested manually clearing leaf litter from old hollow-bearing trees in advance of prescribed burning.	62	No	The plan focuses on habitat protection areas at a higher level, whether using Strategic Fuel Management Zones, Conservation Zones or Exclusion Zones. For an individual operation such as a prescribed burn or fuel break creation, on-ground efforts are identified and driven by specific environmental assessment and operational officers. Protection of significant and hollow-bearing trees occurs at this operational level; therefore, it is not included as part of this strategic plan.	6

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
94	Expressed a desire for more back-burning.	3, 16, 17	No	Noted. DEW recognises that back-burning is an important tactic used by the SACFS during bushfire suppression and this is out of scope for this strategic plan.	6
95	Identified that modelling carried out by the Bushfires and Natural Hazards Research Cooperative Research Centre following the 2019–20 bushfires shows that an intensification of prescribed burning on Kangaroo Island would have limited benefit and would impact biodiversity.	74	No	<p>Noted. The feedback submission refers to a retracted paper that has since been republished by the researcher following correction of a calculation error.</p> <p>The study tested three simulated fire management scenarios on Kangaroo Island, one for bushfire and two for prescribed burning, to estimate impacts on human life, property and biodiversity. The corrected paper states that in their modelling, fire risk was reduced where burn efforts were allocated, and risk shifted to where the island was not covered by fire management zones.</p> <p>The paper also notes that the bushfire-only scenario tended to result in a higher frequency of extreme or very high intensity fires in Flinders Chase National Park than the scenarios using prescribed burning. Another relevant observation is that the prescribed burn blocks used in the study were randomly allocated across the entire national parks estate rather than strategically located to focus risk mitigation efforts, as practised by DEW. Strategic placement of fire management zones plays a critical role in improving bushfire suppression.</p> <p>Prescribed burning is only undertaken at relatively high frequencies in Asset Protection Zones and Bushfire Buffer Zones, where reduced fuel areas are required to manage high bushfire risks. These zones comprise a very small portion of the public land estate. Prescribed burning undertaken in Strategic Fuel Management Zones or Conservation</p>	6

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
				Zones will be undertaken at a frequency that is ecologically appropriate for the vegetation type.	
96	Supported back-burning.	3, 7, 15, 19, 20, 21, 26, 57	No	Noted. DEW recognises that back-burning is an important tactic used by the SACFS during bushfire suppression and this is out of scope for this strategic plan.	6
97	Expressed the view that mosaic burning is not scientifically proven and simply adds to the most abundant vegetation age class on Kangaroo Island.	73, 74	No	DEW agrees that there is not strong scientific support for the premise that burning to create a mosaic of age classes leads to a directly proportional improvement in species diversity and richness. However, there is good evidence that some species have habitat requirements that are strongly related to time since fire, and the provision of sufficient suitable habitat within their area of occupancy is critical for their long-term persistence. Prescribed burns planned for ecological purposes are undertaken to meet the habitat requirements of such species while also considering the needs of other species that occur in the area.	7
Scientific considerations					
98	Supported the use of comprehensive scientific inputs and local knowledge in the plan.	82	No	No change required – supportive of approach taken.	4
99	Expressed concern regarding the lack of scientific basis of the plan.	10, 14, 69, 72, 73, 74, 75, 77, 78, 79, 83, 85, 87	No	A significant body of scientific evidence underpins bushfire mitigation strategies. DEW acknowledges that this evidence could be better communicated and will seek to make changes to improve the level of detail provided on the DEW website. Fire management is a complex field in which there are still significant knowledge gaps and uncertainty. DEW will continue to work with researchers and partners to address these knowledge gaps. The precautionary principle will be used to mitigate risks in the face of uncertainty.	9

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
100	Suggested that a better basis of scientific knowledge should be provided in the plan, especially in the plan's linked documents.	64, 75, 78	No	A significant body of scientific evidence underpins bushfire mitigation strategies. DEW acknowledges that this evidence could be better communicated and will seek to make changes to improve the level of detail provided on the DEW website. Fire management is a complex field in which there are still significant knowledge gaps and uncertainty.	7
101	Expressed concern that linked webpages are vague and lack detail and accuracy, especially about ecological considerations and monitoring.	75, 78	No	Noted. The DEW website will be reviewed to improve the robustness and clarity of statements made.	7
102	Expressed concern about the lack of information in the plan about flora and fauna and their protection, including relating to environmental assessments.	75, 78, 89	No	Noted. Information relating to how flora and fauna are protected through environmental assessments and during the implementation of strategies as part of the statewide fire management program will be included on the DEW website. Information for individual species is gained through input from relevant experts at a local scale and is collected in a database available to DEW staff implementing the fire management program. DEW acknowledges that there is incomplete knowledge of the fire responses of all species. Decisions need to be made despite this uncertainty and DEW will continue to invest in reducing these knowledge gaps over time. The submission of fire response data that helps fill these knowledge gaps is welcomed.	7

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
103	Suggested implementing an effective monitoring program to gather data on the impact of prescribed burning.	72, 73, 78	No	Monitoring is undertaken in accordance with DEW's <i>Fire Management Policies and Procedures</i> . It is acknowledged that this monitoring could be better communicated and mechanisms for doing this will be explored. An Adaptive Management Strategy will also be developed to provide a more strategic and transparent approach to the identification of monitoring and research priorities.	7
104	Expressed concern that the following claim was misleading: 'Fire modelling and observation of many of the bushfires experienced over the past ~10 years have demonstrated the effectiveness of prescribed burning' was demonstrated to be small.	73	No	The Overview of prescribed burning in Australasia , developed by the Australasian Fire and Emergency Service Authorities Council (AFAC), notes that based on applied research and case studies from across Australia, there is a significant body of knowledge which constitutes a compelling case that prescribed burning can play an important role in mitigating bushfire frequency, extent and damage. To maximise effectiveness, DEW plans fuel reduction activities in strategic areas where they are most likely to provide a suppression advantage.	7
105	Suggested including more explanation of the evidence-based decision-making regarding why strategies and zones were chosen for each identified area.	10, 83, 85, 74, 87, 78	Yes	Additional information on strategy selection will be included in the revised plan. Risk assessments on specific assets, in combination with bushfire modelling, identified areas of high bushfire risk to life, property or environmental assets. Strategies to reduce bushfire risk were then determined, based on the level of risk, potential impacts of bushfire, potential impacts of preventative works, ability to implement complementary strategies and feasibility of implementation of different strategy types.	3
106	Expressed the view that there was a need for increased research into fire management.	10, 64, 75	No	Noted. DEW will continue to work with researchers and partners to address knowledge gaps. The	9

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
				precautionary principle will be used to mitigate risks in the face of uncertainty.	
107	Expressed concern about impacts of fire management on biodiversity, habitat, threatened species etc., about a lack of consideration of this in the plan and the lack of strategies to address this.	83, 75, 85, 74, 78	No	<p>DEW acknowledges the impacts and effectiveness of prescribed burning, both positive and negative. These views, as they relate to the statewide program of bushfire risk mitigation, will be reflected on the DEW website. DEW also acknowledges the impacts of large-scale, high-intensity bushfires which, based on climate change forecasts, are expected to increase in frequency and intensity and pose a significant threat to biodiversity, habitat and threatened species.</p> <p>Although protecting life takes precedence, DEW works to find balance in protecting environmental values while managing bushfire risk to life, property and the environment, and makes conscious decisions with regard to using prescribed burning and other mitigation strategies to reduce the risk of large-scale and potentially destructive bushfires. Prescribed burning is only undertaken at relatively high frequencies in Asset Protection Zones and Bushfire Buffer Zones where reduced fuel areas are required to manage high bushfire risks. These zones comprise a very small portion of the public land estate. Prescribed burning undertaken in Strategic Fuel Management Zones or Conservation Zones will be undertaken at a frequency that is ecologically appropriate for the habitat type. DEW acknowledges that it would be beneficial to provide more detailed information about the environmental considerations associated with prescribed burning and will seek to update information on its website accordingly.</p>	7

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
108	Expressed the view that biodiversity management should be put as the first objective for fire management.	69, 70, 72, 73, 75, 78, 85	No	The <i>Fire and Emergency Services Act 2005</i> requires landholders to minimise the threat to human life in the first instance. The South Australian Government is a signatory to the <i>National Bushfire Management Policy Statement for Forests and Rangelands</i> , which places priority on the protection of life while maintaining consideration of the purpose for which the conservation areas were established. Core objectives of the statement include community protection and conservation of natural biodiversity while recognising that optimising for one value may come at the expense of others. DEW seeks to use prescribed burning to reduce bushfire risks in a manner that protects, maintains and enhances biodiversity values.	7
109	Expressed concern that fire management plans no longer identify habitats and species of concern and the means to protect them and that this is only done during prescribed burns.	78	No	Noted. The fire management plan does not list habitats and species of concern; however, the planning process still uses this data.	9
110	Expressed concern about the lack of information or strategies on long-term pre- and post-fire monitoring, species monitoring and research.	83, 75, 85, 87, 78	No	DEW acknowledges that it needs to better share information about the fire-related monitoring and research it undertakes or participates in and will seek to address this.	7

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
111	Expressed concern that the plan does not acknowledge that many species rely on long-unburnt habitats and are harmed by fire; also expressed the view that the plan is misleading and disguises asset protection as landscape protection.	75, 85, 74	No	While it is agreed that a range of species in Australia rely on long-unburnt habitats, the definition of 'long unburnt' varies by habitat type in accordance with an area's natural fire regime. DEW's <i>Ecological Fire Management Guidelines</i> provide broad guidance around ecologically appropriate fire regimes for each major vegetation type, including provisions for the retention of long-unburnt habitat. The needs of specific flora and fauna are considered by DEW staff during the prescribed burn environmental assessment processes. The assertion that the plan disguises asset protection as landscape protection is not accurate.	9
112	Expressed concern that the Dynamic Fire and Biodiversity Modelling Tool is not credible or peer reviewed and only uses some of the available data.	78	No	The Dynamic Fire and Biodiversity Modelling Tool is planned to undergo an external peer review process. While additional survey data was collected on Kangaroo Island to improve the accuracy of the tool, all known available data sets were collated in the models used.	9

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
113	Expressed concern that there is insufficient recognition of the impacts of climate change on environmental values.	72, 75, 77, 78, 85	No	<p>Climate change projections indicate that bushfire risks are likely to increase in SA, presenting a risk for environmental values as well as human life and property. This highlights the need for strategic bushfire mitigation as outlined in the plan. DEW has developed a strong evidence base to support decision-making around the need to respond to climate change. The strategic bushfire mitigation approach taken in this plan is partly in recognition of the need to respond to the predicted increase in the frequency of extreme bushfire weather in SA and the risk this presents for environmental values as well as human life and property.</p> <p>Other mechanisms outside the scope of this plan, including the implementation of threatened species recovery programs and the activation of bushfire Natural Values Teams, are also employed to address bushfire risks to biodiversity. With regards to prescribed burning, climate change risks are assessed at an operational level through an environmental assessment process. Determining funding for mitigating climate change is outside the scope of this plan. However additional text will be provided on DEW website.</p>	7
114	Expressed the view that the plan should value properly caring for Country.	13	No	<p>Where First Nations people aspire to undertake cultural burning practices on national parks and reserves, DEW's fire management program works in partnership to help facilitate and support this. DEW is in the early stages of working with some First Nations peoples to understand their fire-related interests and to support their cultural burning practices.</p>	9

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
115	Expressed concern regarding the impact of proposed fire management on water catchments and related water affecting activities, especially in Ravine des Casoars Wilderness Protection Area.	78	No	The plan does not outline specific information for the implementation of strategies, but instead provides a strategic regional overview of how bushfire risk is planned to be managed. Impacts to waterways and any water affecting activities are managed at a local level, during delivery.	7
116	Expressed the view that DEW needs to implement better monitoring processes.	62, 64, 72, 75, 78	No	Monitoring is undertaken in accordance with DEW <i>Fire Management Policies and Procedures</i> ; however, it is acknowledged that this monitoring could be better communicated. Mechanisms for doing this will be explored. An Adaptive Management Strategy will also be developed to provide a more strategic and transparent approach to the identification of monitoring and research priorities.	7
117	Expressed concern that the plan claims to 'maintain and enhance biodiversity' but then plans to fragment and repeatedly burn native vegetation.	73, 74	No	Noted. The plan aims to reduce bushfire risk to life, property and the environment in the first instance. It also aims to maintain and enhance biodiversity through Conservation Zones and activities aimed at conserving environmental assets. The different aims of the plan are implemented according to the needs of each objective. Prescribed burning is only undertaken at relatively high frequencies in Asset Protection Zones and Bushfire Buffer Zones, where reduced fuel areas are required to manage high bushfire risks. These zones comprise a very small portion of the public land estate. Prescribed burning undertaken in Strategic Fuel Management Zones or Conservation Zones will be undertaken at a frequency that is ecologically appropriate for the habitat type.	9

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
118	Suggested including more information on ecological values and conservation in the plan.	10, 12, 72, 73	Yes	Additional information will be provided on ecological values and their consideration in the plan.	3
119	Expressed concern that proposed strategies (e.g. fragmentation and prescribed burning) for wilderness protection areas do not adhere to the <i>Wilderness Protection Act 1992</i> or Wilderness Code of Management and need to be removed or reconsidered or a separate plan for the wilderness protection areas prepared.	72, 73, 78, 85	No	The <i>National Parks and Wildlife Act 1972</i> and the <i>Wilderness Protection Act 1992</i> , and the associated code of management, enable essential management activities including managing bushfire risk. Fire management plans are not statutory documents; however, they obtain their authorising environment through adopted plans of management for parks and through government policy settings at the state and national level. The DEW fire management program also delivers on the department's responsibilities under the <i>Fire and Emergency Service Act 2005</i> .	8
120	Expressed the view that the only way to protect wilderness protection areas is to maintain their integrity and resilience to allow them to adapt	73, 74	No	DEW has obligations to balance the need to protect the biodiversity values of wilderness protection areas with the need to manage fires in these areas to ensure they do not spread to the extent that they impact human life and property. The strategies in the fire management plan were developed to achieve this balance, noting that reducing the risk of increasingly frequent high-intensity fires due to climate change is also expected to improve ecological resilience.	7
121	Expressed concern that the identified 'environmental assessment ... part of fire management treatment activity processes' is inadequate and does not consider all species.	73	No	DEW acknowledges that there is incomplete knowledge of the fire responses of all species. Decisions need to be made despite this uncertainty and DEW will continue to invest in reducing these knowledge gaps. The submission of fire response data that helps fill these knowledge gaps is welcomed.	9

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
122	Suggested that the plan should make it clearer that not all species respond well to prescribed burning.	75	Yes	Additional text to acknowledge that prescribed burning and bushfire may have impacts on some species will be included in the revised plan and on the DEW website.	2
123	Suggested that the plan includes management strategies for weeds, feral animals and <i>Phytophthora</i> , including how they will be managed when new tracks are developed.	17, 62, 73, 74, 75 78, 83, 87	Yes	Management of weeds, feral animals and <i>Phytophthora cinnamomi</i> is a key component of protected area management on Kangaroo Island, as reflected in the various park management plans. When implementing strategies such as upgrading tracks and conducting prescribed burning, fire management staff will maintain standard practices such as restricting public access, preparing management plans for contractors and establishing washdown procedures for staff. The fire management plan will note these considerations, but DEW procedures and operational plans will outline the management of relevant issues for individual or interrelated activities. A number of programs coordinate the management of weeds and feral animals and collaborate with the DEW fire management program where appropriate.	3
124	Suggested that the plan should provide a more biodiversity-focused strategy for wilderness protection areas to protect their unique values.	79	No	The importance of protecting the biodiversity values of the wilderness protection areas is recognised. As many of the wilderness protection areas were recently burnt, extensive areas have been left unzoned or are covered by formal exclusion areas. Note that the extensive Bushfire Buffer Zones used along access tracks in the previous Flinders Chase Fire Management Plan have been replaced with Strategic Fuel Management Zones, removing the requirement for repeated burning of identical areas to achieve the fuel load targets set out in the State Bushfire Coordination Committee zone standard.	7

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
125	Expressed concern regarding the lack of discussion regarding blue gum plantations.	11	No	Outside the scope of this plan. The plan cannot direct management of adjacent land.	6
126	Expressed concern regarding lack of direction on removing plantation trees.	28	No	Outside the scope of this plan. The plan cannot direct management of adjacent land and does not direct programs outside of fire management.	6
Infrastructure					
127	Supported proposed water infrastructure.	3	No	No change required – supportive of plan.	4
128	Supported installation of additional water sources.	20, 53, 58, 61, 19	No	No change required – supportive of plan.	4
129	Expressed concern that the plan does not provide for enough water infrastructure and expressed desire for more water infrastructure.	3, 17, 29	No	The plan only highlights new water infrastructure that will expand on the existing water infrastructure and sources across the region. For example, existing water infrastructure not mentioned in the plan include water tanks on Shackle Road that provide options for crews undertaking prescribed burns or bushfire suppression in the Ravine des Casoars Wilderness Protection Area, and water tanks at the Rocky River precinct that hold over 500 kL of water and can support operations in Flinders Chase National Park.	7
130	Expressed the view that the proposed water infrastructure in Ravine des Casoars Wilderness Protection Area would not be effective for most fires, that it is inconsistent with wilderness protection areas because it would require a significant buffer, and that funds are better spent elsewhere.	73	No	The proposed water infrastructure will be essential in assisting for both prescribed burning and bushfire response. They will significantly reduce turn-around times for fire-fighting appliances, a noted issue when undertaking prescribed burning and responding to bushfires in this area.	7
131	Supported helipads inside large parks.	3	No	DEW believes existing open areas are adequate to support aircraft and no additional landing areas need to be identified.	7

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
132	Expressed the view that mobile phone coverage on the island needs to be improved to facilitate bushfire management.	3	No	Outside the scope of this plan. Mobile phone infrastructure and coverage is determined by telecommunications providers.	6
133	Suggested that the plan include strategies around adaptation of dwellings and how they can be protected.	73	No	Outside the scope of this plan.	6
134	Suggested that fire management action should be focused around built assets only.	73	No	The plan identifies a combination of asset-specific and broader activities to interrupt landscape spread of fires. This is in line with the requirements of the <i>Fire and Emergency Services Act 2005</i> .	7
135	Suggested prohibiting any future developments close to any park borders.	80	No	Outside the scope of this plan. New developments outside parks are subject to assessment and approvals outside the control of DEW.	6
136	Suggested developing 'avoidance' strategies, with appropriate infrastructure at key locations, for residents and visitors to escape to during periods of high risk or during a fire event.	85	No	Outside the scope of this plan. The SACFS provides tools and workshops to assist people in preparing for the fire danger season and bushfires. SACFS has also identified two types of places that can be used to shelter from bushfires: Bushfire Safer Places and Bushfire Last Resort Refuges; information is available on the SACFS website.	6
137	Suggested ensuring development adequately accounts for fire risk and that structures are not built in inappropriate high bushfire risk areas.	85	No	All assets on parks are designed to meet bushfire safety requirements. Private land is outside the scope of this plan.	6
138	Expressed the view that the plan does not need to be able to protect single dwellings or settlements located in natural areas, and that special purpose engineering, individual bushfire survival plans, property preparedness plans and insurance are the best strategies for this.	87	No	DEW agrees that building standards, bushfire survival plans and property preparedness are important for all individuals and communities to improve their safety against the threat of bushfire. The mitigation strategies identified in the plan aim to prevent or inhibit the spread of fire through reserves into surrounding areas thereby contributing to reductions in bushfire risk to the surrounding community.	7

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
139	Proposed that fires that start in parks should be kept within park boundaries to protect private property.	89	No	The plan aims to reduce the likelihood of bushfires escaping from or entering parks where the risk has been identified as high. The strategies identified in the plan provide a greater window of opportunity for effective suppression. This is in line with the requirements of the <i>Fire and Emergency Services Act 2005</i> .	6, 9
Aerial firefighting					
140	Recommended more aerial firefighting capability and strategies.	74, 75, 79	No	Under the <i>Fire and Emergency Services Act 2005</i> , SACFS is the control agency for South Australia's bushfire response. Aircraft are a resource used by SACFS in bushfire suppression when deemed appropriate and access to and the deployment of aircraft is an important logistic consideration. However, DEW cannot determine the use of aircraft during bushfire response and must aim to reduce risk prior to a bushfire starting.	6
141	Suggested including strategies around use of aerial firefighting capability, including a very large air tanker (VLAT) strategy.	36, 72, 73, 75, 85	No	Under the <i>Fire and Emergency Services Act 2005</i> , SACFS is the control agency for South Australia's bushfire response. Aircraft are a resource used by SACFS in bushfire suppression when deemed appropriate and the deployment of aircraft is an important logistic consideration. The sole reliance on aircraft to respond is not adequate in addressing bushfire risk as their use is limited by weather conditions, timeliness and competing priorities. It is also recognised nationally that aircraft alone do not extinguish fires and that ground-based resources are required to access the fire edge.	6

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
Funding					
142	Questioned whether the plan was effective use of public funds.	62	No	Through the development of this island-wide strategic plan for fire management, DEW aims to identify how to use funds efficiently and effectively in meeting its obligations to reduce bushfire risk to life, property and the environment.	9
143	Suggested that funding and resources for fire management should be increased.	10, 14	No	Outside the scope of this plan. The government funding cycle is not driven by the creation of this plan, although the plan does highlight the work required to manage bushfire risk and ecological fire management on DEW-managed lands.	6
144	Use First Nations knowledge in fire management and fund First Nations people to participate in fire management.	13	No	Where First Nations people have aspirations to undertake cultural burning practices on national parks and reserves, DEW's fire management program will work in partnership to help facilitate and support this. DEW is in the early stages of working with some First Nations peoples to understand their fire-related interests and to support their cultural burning practices.	6
145	Expressed concern that funding of strategies is not identified.	19, 37, 87	No	Detailed funding for each strategy is not identified in the strategic plan. Regional program planning and operational planning will allow regions to identify funding requirements based on specific operations once they have been designed in preparation for delivery.	6
Community involvement and consultation					
146	Expressed concern regarding the lack of consideration of private land in the plan.	11, 12	No	Outside the scope of this plan. Adjacent bushfire risk mitigation works included in the State Bushfire Coordination Committee's <i>Kangaroo Island Bushfire Management Area Plan</i> were considered in the preparation of this plan.	6

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
147	Suggested that DEW should formalise and use the Kangaroo Island Bushfire Management Committee or another pre-existing multi-stakeholder arrangement for annual reporting on implementation of the plan and to facilitate collaboration.	82	No	Outside the scope of this plan. DEW has existing formal arrangements with the Kangaroo Island Bushfire Management Committee (KI BMC). The strategies identified in this plan will be included in the updated <i>Bushfire Management Area Plan</i> and fire management activities will be reported through the KI BMC.	6
148	Suggested ensuring that professional, properly trained National Parks and Wildlife Service (NPWS) personnel lead and control fire management teams rather than CFS volunteers.	85	No	Outside the scope of this plan. Under the <i>Fire and Emergency Services Act 2005</i> , SACFS is the control agency for South Australia's bushfire response. DEW operates as a group within the SACFS structure and contributes to bushfire response under SACFS as brigade members. DEW staff involved in fire management undertake the same nationally accredited training as CFS staff and volunteers, often together, and perform only roles they are suitably qualified and experienced to undertake.	6
149	Suggested that the plan should include improving coordination between NPWS staff, SACFS, SES and local landowners during bushfires.	14, 76, 91	No	Outside the scope of this plan. SACFS is the control agency for South Australia's bushfire response.	6
150	Suggested giving more autonomy to local firefighters to respond during a bushfire.	41, 17	No	Outside the scope of this plan. SACFS is the control agency for South Australia's bushfire response, therefore the policies of SACFS determine how incidents are managed.	6
151	Suggested giving more autonomy to farmers to respond during a bushfire.	28	No	Outside the scope of this plan. SACFS is the control agency for South Australia's bushfire response, therefore the policies of SACFS determine how incidents are managed.	6

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
152	Suggested building better relationships between locals and mainlanders who assist in fire suppression, between adjoining landholders and within the local community.	89	No	Outside the scope of this plan. The plan does identify the need to continue to partner with neighbouring landholders, the community and SACFS to help reduce bushfire risk. Programs to undertake preventative off-park work, such as the Burning on Private Land program, assist in developing relationships between DEW fire management and local landholders.	6
153	Suggested that the plan should include community education.	75, 78	No	Outside the scope of this plan. Improved signage in key visitor areas will aim to better communicate fire management and safety information on parks.	6
154	Suggested that the plan should encourage locals to have insurance.	89	No	Outside the scope of this plan. Individuals are responsible for managing private insurance arrangements.	6
155	Suggested that the plan should provide a strategy for protecting visitors.	89	No	The plan already includes reduced fuel areas adjacent to high visitation sites, fuel breaks along access routes, and site bushfire plans, all of which contribute to reducing bushfire risk to visitors and staff.	5
156	Identified the importance of giving decision-making power to onsite fire control officers to facilitate quick decision-making.	6	No	Outside the scope of this plan. SACFS is the control agency for South Australia's bushfire response, therefore the policies of SACFS determine how incidents are managed.	6
157	Identified the need for better coordination between agencies to facilitate quicker and better decision-making.	8, 89	No	Outside the scope of this plan. SACFS is the control agency for South Australia's bushfire response, therefore the policies of SACFS determine how incidents are managed.	6

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
158	Expressed the view that this plan does not enable the community to play a role in bushfire management.	87	No	Noted. The plan identifies the need to continue to partner with neighbouring landholders, the community and the SACFS to help reduce bushfire risk. The consultation undertaken aims to increase community input to fire management works undertaken on public land.	6
159	Expressed the view that local knowledge should be sought when fighting fires and planning back-burns.	91	No	Outside the scope of this plan. SACFS is the control agency for South Australia's bushfire response, therefore the policies of SACFS determine how incidents are managed and how local knowledge is incorporated into bushfire response and tactics such as back-burning.	6
160	Expressed concern regarding a lack of consultation with First Nations peoples and supported the inclusion of First Nations fire management practices.	5, 13, 27	No	DEW recognises that First Nations people and groups have a cultural connection with Kangaroo Island and hold aspirations for its land and fire management. Where First Nations people aspire to undertake cultural burning practices on national parks and reserves, DEW's fire management program will work in partnership to help facilitate and support this. DEW is in the early stages of working with some First Nations peoples to understand their fire-related interests and to support their cultural burning practices. Consultation with First Nations is ongoing.	9
161	Expressed the view that local opinions should be considered over those of non-locals.	36	No	DEW recognises that the topics covered in this plan are applicable both locally and more broadly, therefore the views of all stakeholders are considered through the consultation process.	9

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
162	Expressed concern that engagement has not been adequate or genuine.	73, 75, 79, 83	No	DEW has undertaken extensive consultation since the beginning of the planning process, including multiple presentations and meetings with community groups, non-government organisations and individual landholders. The strategies in the plan to address bushfire risk across Kangaroo Island were shaped by these activities in conjunction with the risk assessments and expert opinion. The formal consultation period of 6 weeks for the draft fire management plan was longer than the consultation periods for previous fire management plan. The changes identified and implemented arising from the consultation process are an example of DEW's commitment to continuous and genuine engagement.	9
163	Supported using First Nations knowledge.	5	No	Where First Nations people aspire to undertake cultural burning practices on national parks and reserves, DEW's fire management program will work in partnership to help facilitate and support this. DEW is in the early stages of working with some First Nations peoples to understand their fire-related interests and to support their cultural burning practices.	9
Related doctrine					
164	Noted that the <i>National Parks and Wildlife Act 1972</i> schedules are outdated.	78	No	Outside the scope of the plan.	6
165	Noted that the South Australian Wildlife and Habitat Bushfire Recovery Framework (DEW 2020) is referenced on the fire management website but is outdated and the actions are not addressed.	78	No	Outside the scope of the plan. The documents referenced on the DEW website are the most current approved versions. The Parks of Kangaroo Island Fire Management Plan is not intended to address or implement the actions identified in the South Australian Wildlife and Habitat Bushfire Recovery Framework (2020).	6

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
166	Noted that the <i>Bushfire Management Area Plan</i> (2.0 update) is outdated, despite recommendations in the Keelty Report; also the link does not work.	78	Yes	Outside the scope of the plan. The <i>Kangaroo Island Bushfire Management Area Plan</i> is still current; the hyperlink will be amended. The update of the Bushfire Management Area Plans by the State Bushfire Coordination Committee is ongoing.	3
167	Expressed concern that the plan does not refer to the Royal Commission into National Natural Disaster Arrangements, state government policy prior to the last election, the Australian Government '30 by 30' policy, or the <i>Animal Welfare Act 1985</i> .	85, 78	No	Policy directions and decisions, and addressing recommendations from the Bushfire Royal Commission, are considered at a fire management program level (where they apply to DEW) not in a single regional plan. Therefore, specific reference is not necessary in the Parks of Kangaroo Island Fire Management Plan. No reference to the <i>Animal Welfare Act 1985</i> is necessary. The Australian Government '30 by 30' policy is not relevant to identifying bushfire risk in existing protected areas.	6
168	Expressed concern that there is not a code of practice for bushfire prevention and preparedness on private land.	87	No	Outside the scope of the plan. The development of codes of practice for bushfire prevention and preparedness are led by SACFS.	6
169	Expressed concern that the strategies do not adhere to legislation including <i>Environment Protection and Biodiversity Conservation Act 1999</i> , <i>National Parks and Wildlife Act 1972</i> , <i>Native Vegetation Act 1991</i> and <i>Wilderness Protection Act 1992</i> (and associated code of management).	75, 85, 78	No	Fire management plans are not statutory documents; however, they obtain their authorising environment through adopted plans of management for parks and through government policy settings at the state and national level. Fire management plans such as this plan do adhere to the legislation listed in the comment, as follows: The plans are subject to approval by the Native Vegetation Council to ensure they meet the requirements of the <i>Native Vegetation Act 1991</i> . Activities undertaken in the development and implementation of the plan are in accordance with the <i>Strategic Assessment of DEWNR Fire Management</i> under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> . The <i>National Parks and Wildlife Act 1972</i> and the	8

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
				<p><i>Wilderness Protection Act 1992</i> and associated code of management both enable the management of bushfire risk.</p> <p>Finally, the DEW fire management program also delivers on the responsibilities of DEW under the <i>Fire and Emergency Service Act 2005</i>.</p>	
170	Identified a preference for the plan to be better integrated with other council plans, SACFS strategies and the <i>Kangaroo Island Bushfire Management Area Plan</i> (BMAP) to facilitate a coordinated approach across all land tenures.	85, 87	No	<p>There has been integration and coordination in the development of this plan. The plan uses the risk assessments for assets undertaken by SACFS for the <i>Kangaroo Island Bushfire Management Area Plan</i> (KI BMAP) and has undertaken additional site risk assessments as required. The outcomes of the risk assessments have been shared with SACFS. Existing strategies on land adjacent to DEW-managed land was considered and influenced the strategies in this plan. The strategies identified in the plan will be included in the updated KI BMAP and implementation is reported internally and through the Kangaroo Island Bushfire Management Committee.</p>	9

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
171	Expressed concern that this plan treats the wilderness protection areas under the <i>National Parks and Wildlife Act 1972</i> not the <i>Wilderness Protection Act 1992</i> and the Wilderness Protection Area Code of Management, and expressed a preference to have a separate plan for the wilderness protection areas.	85	No	The plan assesses landscape risk irrespective of land boundaries but considers strategies based on the requirements of the relevant legislation. Strategic-level risk management should consider landscapes so a separate plan for wilderness protection areas is not preferred. Implementation of the plan and individual activities identified in the plan will be subject to the relevant legislation at the location in which they take place.	7
Feedback provided on the format and presentation of the plan					
General comment					
172	Provided a general supportive comment.	18, 19, 66	No	No change required – supportive of plan.	4
173	Provided a general negative comment.	16	No	Noted. More detail has been provided in sections of the plan in response to issues raised in this submission. Please see further detail in this document for changes made.	9
174	Considered that the plan used language and presentation that were easy to understand.	1, 8, 21, 51, 65	No	No change required – supportive of plan.	4
175	Noted the easy navigation through the use of headings and maps.	3, 12, 49, 67, 76, 82	No	No change required – supportive of plan.	4
176	Noted the visual and engaging presentation.	5, 58, 82	No	No change required – supportive of plan.	4
177	Noted that the interactive maps and pictures convey information more clearly than text.	20, 24, 27, 33, 57, 58	No	No change required – supportive of plan.	4
178	Expressed support for the maps.	21, 28, 51, 53, 61, 81	No	No change required – supportive of plan.	4
179	Praised the plan as concise and direct.	25, 34	No	No change required – supportive of plan.	4
180	Considered that the plan integrates historical fire information with future management.	29	No	No change required – supportive of plan.	4

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
181	Considered that content flows in a logical order.	31, 43, 47, 54	No	No change required – supportive of plan.	4
182	Found that it was easy to understand why decisions have been made.	39	No	No change required – supportive of plan.	4
183	Considered that the plan was too high level and lacked detail regarding how decisions were made and what the future management and implementation of the plan will involve.	10, 11, 13, 14, 59, 78, 83	Yes	Additional general information on implementation will be added to the revised plan. This plan identifies areas where future management activities will take place to reduce risk from bushfire to life, property and the environment. As a strategic plan, it provides guidance to regional staff while allowing them to determine the best way to achieve the desired risk reduction outcomes, based on environmental assessments, feasibility considerations and resource availability. The guiding principles for each zone type are outlined in the <i>Fire Management Zone Standard and Guidance for Use</i> developed by the State Bushfire Coordination Committee; these guide staff on the desired outcomes for each zone. Program and annual planning will determine the details of specific timeframes and operational delivery of the plan.	7
184	Considered the plan too long winded and repetitive.	45, 76	No	This plan is significantly shorter than previous plans, with a focus on showing the strategies that will be implemented, in a format that is directly usable by DEW staff involved in its implementation.	7
185	Considered the plan too complicated/complex.	6, 17, 55, 70, 91	Yes	DEW will review the online format to improve usability of the plan and will develop a tutorial to assist in viewing the plan strategies.	9
186	Suggested providing a one-page summary option.	37, 50	No	A summary page will not be created; however, other changes to the plan, including improved tutorials, will aim to improve usability and make information simpler to find.	7

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
187	Considered the plan provides a good level of information.	32	No	No change required – supportive of plan.	4
Suggested improvements					
188	Suggested providing a plan that is easier to access, with a downloadable or hard-copy version available.	4, 71, 72, 75, 78, 79, 82, 85	Yes	To assist the general public to access and view the plan, a downloadable version of the plan text will be provided and better tutorials on how to use the plan will be developed. Hard-copy versions will continue to be created for the text component of the plan, as used for the draft consultation period.	2
189	Expressed concern about the digital presentation of the strategy making navigation difficult.	4, 73, 82	Yes	Better tutorials on how to use the strategy map will be developed. Hard-copy versions will continue to be created for the text component of the plan, as used for the draft consultation period.	3
190	Suggested the map has a new key code for strategies outside the life of this plan, e.g. treatments identified as 10+ years (Phase 3).	78	Yes	Additional tutorials on viewing the information, including implementation phases, will be provided. Information on how phases are determined will be provided in the revised plan.	2
191	Expressed concern that the story map does not have a legend for fire frequency	78	No	The fire frequency legend is located on the bottom-left corner of the map; the darkest red indicates that records exist of 9 overlapping fires having occurred in some areas.	5
192	Suggested using more distinct colour differences to more clearly differentiate the zone types; suggested making legends clearer.	12, 25, 53, 60, 64, 67, 72, 75	Yes	Colour palette to be reviewed to improve differentiation while maintaining accessibility needs. A tutorial will be created to highlight how to view the legend to avoid confusion.	2
193	Expressed concern that the legend for the strategy map is unclear and unexplained.	75, 85	Yes	A downloadable version of the plan text will be provided and better tutorials on how to use the strategy map will be developed. Hard-copy versions will continue to be created for the text component of the plan, as used for the draft consultation period.	3
194	Explained that the links were found to be tedious.	67, 73	Yes	Links provided in the fire management plan will be reviewed to improve information sharing.	3

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
195	Expressed concern that the presentation requires technology skills and equipment (e.g. large screens and internet access) and this makes the plan inaccessible to some.	83, 75, 85, 78	Yes	Hard-copy versions will continue to be created for the text component of the plan, as used for the draft consultation period. A downloadable version of the plan text will be provided and better tutorials on how to use the plan will be developed. The plan is optimised for various devices including computers, tablets and smart phones.	3
196	Expressed concern that much information is contained in linked webpages that are easily missed, make navigation difficult, make it difficult to understand the plan as a whole, and could be modified at any time.	83, 75, 87, 78	Yes	The linked information on the DEW website is general in nature and applicable to the entire fire management program. It does not form a part of the specific strategies outlined in this Parks of Kangaroo Island Fire Management Plan. Content is updated as new information is made available or in response to user feedback. Links from the fire management plan will be reviewed to improve usability.	3
197	Identified that some links are broken.	87	Yes	Links in the fire management plan will be updated or removed where they are no longer functional. The links on the DEW fire management website will also be reviewed.	3
198	Considered that the use of terms is misleading, e.g. WA as opposed to WPA for wilderness protection areas.	78, 85	Yes	The code 'WA' is from a standardised map with a two-letter abbreviation, in line with other protected areas. The plan will use an updated map that includes 'Protection' in the title for wilderness protection areas.	3

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
199	Expressed concern that the symbol representing fire access tracks / firebreaks on the map is misleading because they are the same width.	74	Yes	The width of fuel breaks is visible in the strategy map pop-up window, viewed by selecting the specific break on the strategy map in the plan. Better clarity can be seen by zooming in to the map as the width depicted on the map reflects the actual width of fuel breaks in the landscape. DEW will create a tutorial to assist map usability and will investigate improving map visibility. The width of the fire access tracks is determined by the track classification as defined in the <i>South Australian Firebreaks, Fire Access Track and Sign Standards Guidelines</i> . The classification of existing tracks is available on the Fire Management Maps webpage. This plan only describes changes to the track network.	3
200	Expressed concern that using webpages means that information can be changed at any time, which reduces stability, transparency and accountability of the plan and associated links.	75, 78	No	The content of the plan will not be changed without following DEW policies and procedures; this will maintain the integrity of the plan. The DEW website content is subject to change based on new lessons learned, emerging knowledge and changing needs of stakeholders. Any changes in legislation or policy reflected on the website will have undergone appropriate approval processes.	9
201	Considered the plan difficult to navigate, especially for those with limited technological skills.	14, 15, 22, 35, 56, 75,78	Yes	Changes to the plan, including improved tutorials, will aim to improve usability and make information simpler to find. Hard-copy versions will continue to be created for the text component of the plan, as for the draft consultation.	3
202	Criticised the lack of ability to word search the plan.	75	Yes	Word search will be possible in a downloadable version of the plan.	2
203	Criticised the lack of identification of wilderness protection area boundaries on the strategy map.	78	Yes	A different base map will be used to identify reserve boundaries.	2

Comment number	Comment	Submitter number	Plan amended?	DEW response	Criteria
204	Criticised aspects of the maps, including the lack of detail, misleading use of symbols, inaccuracies, and fire trails and firebreaks overlaid on the same map using the same symbols.	74, 78, 79	Yes	DEW will investigate improving map usability and visibility for identification of map features. Better clarity can be seen by zooming in to the or by clicking on the strategy of interest. The legend tab shows the different symbols for the strategy types, with fire access track changes shown as lines and fuel breaks shown as shaded boxes.	3
205	Explained that had difficulty chasing details down through links, which made it difficult to find information; expressed a preference for all required information to be presented in the plan itself.	23, 37, 69, 75, 78	Yes	The hyperlinks referred to will be consolidated and reviewed to reduce confusion. The plan deliverables will continue to be presented in a map format, although a tutorial will be developed to improve user accessibility.	3