

Analysis of Public Submissions

Munga-Thirri—Simpson Desert National Park Management Plan

The Munga-Thirri—Simpson Desert National Park Draft Management Plan was released for public consultation on 11 October 2021. Consultation closed on 11 January 2021.

During that time, members of the public had the option to have their say by completing an online survey through the YourSAy website, or by providing a written submission by email or mail.

Twenty-two submissions were received during the consultation period. These submissions are analysed in this document.

All submissions on the draft park management plan are carefully reviewed against the following criteria:

Feedback meeting criteria 1-3 below, result in alterations:

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

Feedback meeting criteria 4-9 below **do not** result in alterations:

4. Feedback clearly supported the draft plan;

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

Munga-Thirri—Simpson Desert National Park Management Plan – public consultation summary

Twenty-two submissions were received during the consultation period, which are listed in Table 1. Nineteen submissions were received through the online survey function, and three were provided by emailed letter. Table 2 provides an analysis of all submissions by drawing out individual items of feedback, and the response taken to this feedback.

A summary of survey questions is included as Table 3. The survey demonstrated broad support for the themes and objectives for management outlined in the draft plan. Open text questions provided the opportunity for more specific comments from members of the public making a submission. Commentary from the survey has been incorporated into Table 2.

Minor changes were made to the draft management plan as a result of formal submissions and feedback from stakeholders during the consultation phase.

Table 1: Summary of submissions

Submission number	Respondent	Respondent type	Submission type
1	Barry Brown	Individual	Survey
2	Rosy Centrella	Individual	Survey
3	Aly Johnson	Individual	Survey
4	Michael Cornish	Individual	Survey
5	Megan Spyker	Individual	Survey
6	Tony Aykroyd	Individual	Survey
7	Steve Hastwell	Individual	Survey
8	Dale Clarke	Individual	Survey
9	Jeff Thomas	Individual	Survey
10	Malgo Schmidt	Individual	Survey
11	Daniel Eiszele	Individual	Survey
12	Hartmuth Fink	Individual	Survey
13	Tony Glowacki	Individual	Survey
14	Doug Short	Individual	Survey
15	Andrew Schlein	Individual	Survey
16	David Roshier	Individual	Survey
17	Shaun Rolevink	Individual	Survey
18	Lucy Moffatt	Individual	Survey
19	State Planning Commission	Government	Letter
20	J Morphet	Individual	Survey
21	Confidential	Business	Letter
22	The Wilderness Society SA	NGO	Letter

Table 2. Analysis of submissions

Comment Number	Comment	Submission Number	Plan Altered	Response	Criteria
General support					
1	Supported the direction of the plan with no specific feedback provided.	6, 21	No	Submissions supported the plan, and provided no additional information or suggestions which could be considered.	4
2	Specifically supported the creation of a new zone to protect the Kallakooah Creek.	3, 5, 6, 7, 14, 15	No	Submissions voiced particular support for this theme, with no requests to expand the zone or change the management conditions outlined in the plan.	4
General feedback					
3	Expressed the view that the environment should be given greater focus within the park management plan.	2, 3, 10, 16	No	Management of the environment is already a key theme within the park management plan, supported by a variety of strategies.	5
4	Expressed the view that minimal visitor infrastructure and a natural, wild experience must be maintained in the park.	8, 11, 12, 22	No	Minimal visitor infrastructure is envisioned in the management plan currently. No specific changes to the management plan were sought. Changes made as a result of other feedback further stresses the importance of maintaining a wilderness experience.	5
5	Expressed the view that First Nations should be consulted with as a priority for park management.	2, 12	No	Consultation with First Nations is already a priority for park management, as outlined in the park management plan.	5, 9
6	More access should be given to the cultural history of the region.	13, 17	No	The park management plan already continues a theme and multiple strategies seeking to increase knowledge of culture and to facilitate greater cultural experiences into the future.	9
7	Voiced support for continued 4WD access as an important aspect of the park's ongoing management.	1, 10, 15, 19	No	No specific change was sought. Continuing 4WD access and the importance of this access is already explored in detail in the park management plan.	5, 9
8	Provided information about good camping practices.	7	No	Details on good camping practices is not considered relevant in a strategic document of this kind. Information on the website and within the Desert Parks Pass is considered more appropriate in educating the public on good practice in the park. This also allows information to change according to conditions or observed impacts.	9
Recommendations for change					
9	That no mining be permitted to continue in the park at all, and/or the Kallakooah protection zone should continue to be increased in size to eventually remove mining from the park.	2, 4, 9, 12, 17, 18, 19, 22	No	No change made in response to feedback. While mining has been limited within the park in the park plan, it is beyond the scope of this plan to ban mining across the national park. Overall mining access should be addressed	6

				at the park proclamation level and in line with any existing government policy.	
10	That greater prescription be included for off road vehicles, including that caravans and camper trailers should not be permitted in the park, due to the impacts they can cause.	5, 8, 9	No	The plan outlines reported issues with trailers, with the policy outlined in the plan that they be permitted to continue as they are necessary for some visitors. Caravans and trailers are generally discouraged, for example on the parks website, rather than outright forbidden in the plan. Decisions on vehicles being restricted on certain tracks may be made from time to time as required.	7
11	Suggested developing more dedicated campsites within the park.	7	No	Dedicated campsites are not considered appropriate at this time, but the plan allows for their consideration into the future. Campers are encouraged to re-use observed campsites in the management plan. Inclusion of detailed or prescriptive information on the location of campsites is not appropriate for a strategic plan of this type.	6
12	Dogs should be permitted in the park.	8	No	Dogs are not permitted in this park. No change is recommended to this approach, to avoid threats to the natural environment.	7
13	Suggested a map be included in the management plan.	14	No	Two maps of the park are already included in the management plan.	8
14	The park should be handed back to First Nations for their management.	18	No	A handover of the park to Wangkangurru Yarluyandi is beyond the scope of this plan.	6
15	Suggested specific information around the use/collection of firewood.	16	Yes	A paragraph regarding the use of firewood was included in the plan.	3
16	Limit the number of park passes issued, and make the passes for a shorter time than a year, so that numbers of visitors can be limited during peak seasons to reduce damage to the park.	17	No	Park visitor numbers can currently be managed through the parks pass system. Should any future issues arise, limits may be placed under the requirements of this plan to maintain wilderness quality and experience.	7
17	That South Australian National Parks adopt a similar system of 4WD management as Victoria.	15	No	The current system of 4WD access is considered appropriate. It is beyond the scope of this management plan to change state-based 4WD policy.	6
18	Traditional owners should not be allowed to use firearms, only traditional methods in keeping with the original expectation of respect for the land.	17	No	The use of firearms as a part of exercising native title rights is beyond the scope of this management plan.	6
19	To achieve better integration with the planning system, it is recommended that all Park Management Plans include a specific section that clearly articulates the envisaged land uses for the	21	No	No developments are planned within the park. Only minor developments are anticipated into the future. Therefore this change is not considered necessary.	7

	National Park, based on the land use definitions used in Part 7 of the Code.				
20	The plan should be amended to include wilderness quality mapping. This mapping should be used for the periodic assessment of wilderness quality across the park, and to determine the impact of proposed developments such as new tracks.	22	No	The park management plan already includes strategies to support research, monitoring and surveys to increase understanding of plants and animals in the desert, and to ensure that new tracks do not impact on park values. Specific methods of monitoring are not considered necessary in a strategic document of this nature.	5, 6
21	That the draft plan be amended to acknowledge the link between fossil fuel production and climate change, and the incompatibility of fossil fuel industry expansion with the Object of the National Parks Act.	22	No	The ability to mine for fossil fuels under certain circumstances, and subject to certain conditions, is a valid use recognised in the <i>National Parks and Wildlife Act 1972</i> .	6
22	That the approval process for petroleum exploration and production licences include the assessment of the environmental impact of burning more fossil fuels, both on the ecosystems of the National Park and beyond.	22	No	The approval process for petroleum exploration and production licences is managed under the <i>Petroleum and Geothermal Energy Act 2000</i> . It is beyond the scope of a park management plan to implement additional requirements for approval.	6
23	That the draft plan be amended to also note the extraordinary extent of rare flooding events in Munga-Thirri—Simpson Desert.	22	Yes	Additional information on the impacts of rare flood events has been incorporated into the plan.	1
24	That the draft plan be amended to stress the need for the maintenance of natural water flows in the Georgina, Eyre and Diamantina/Warburton Rivers.	22	Yes	Additional information on the importance of these natural flows has been incorporated into the plan.	1
25	Should fossil fuel industries be permitted to expand into the park, the draft plan must be amended to guarantee the cost of any attempted rehabilitation is borne by the fossil fuel explorer/producer. Monies should be set aside in a fund to ensure that such costs don't fall to the Government.	22	No	It is beyond the scope of the park management plan to create additional financial requirements for geothermal licences, which are managed under the <i>Petroleum and Geothermal Energy Act 2000</i> .	6
26	That the draft plan be amended to include strategies to control track proliferation.	22	Yes	Track proliferation is not considered a significant issue at this time. However, some information on the expectations on visitors has been included.	1
27	That the draft plan be amended to include data on predicted climate change so readers are aware of the significance of this problem.	22	Yes	Additional data has been provided, in-keeping with the recommended sources, to demonstrate the predicted impact of climate change within the arid region of South Australia.	1
28	That the draft plan be amended to identify the types of sites which are biologically significant or fragile.	22	No	Detailed mapping of this kind is not considered appropriate for a strategic document of this kind. Sites which are biologically all culturally significant are managed through operational plans and objectives.	6

29	That the draft plan be amended so the text and strategies for Theme 3 include preserving 'wilderness experience'.	22	Yes	A change has been made to include wilderness experience, and a commitment in the plan to maintain that experience.	1
30	That the draft plan be amended so the strategies for Theme 3 include a visitor management strategy which maintains visitors' sense of remoteness.	22	Yes	A change has been made in the text of the plan to stress the importance of maintaining a sense of remoteness.	1

Table 3 – Survey questions

The questions included in the survey are outlined below. In most cases, respondents provided a mix of quantitative (checkbox and lickert scale) and qualitative (open text) data within the survey. Where survey submissions indicated support for a given theme or objective, it was often corresponding with written text which provided further information to support their answer. For this reason, quantitative information is not presented here independently, but has been used in creating the analysis table above.

Number	Question	Question type
1	What is your relationship with the park?	Checkbox
2	The draft plan identifies three themes of importance to protect and manage the Munga-Thirri—Simpson Desert National Park. How important are each of these themes to you?	Lickert scale
3	Each theme sets out objectives for the draft plan. What is your level of support for each objective?	Lickert scale
4	How could the objectives be improved?	Open text
5	Are there any other objectives you think should be included?	Open text
6	The draft plan sets out strategies to achieve each of the objectives. Are there any strategies you feel shouldn't be included? Why?	Open text
7	Are there any strategies that you would like to see included that aren't currently there? Please provide details.	Open text
8	The draft plan sets out an additional strategy to manage the wilderness values within the Kallakoopah Wilderness Zone by limiting mineral and energy resource exploration or production activities, and maintaining minimal visitor access. What are your views on this new strategy?	Open text
9	Do you have any other feedback on the draft plan which you would like considered in finalising the plan?	Open text