Analysis of Public Submissions

Parks of Western and Central Kangaroo Island Draft Management Plan

The Parks of Western and Central Kangaroo Island Draft Management Plan was released for three months public consultation from 17 September to 17 December 2021.

Members of the public had the option to provide feedback on the draft management plan by completing an online survey or providing a written submission through the YourSAy website, email, or mail during that time.

A total of 158 submissions were received, which comprised of 93 survey responses and 65 written submissions. These submissions are summarised in Table 1.

All submissions on draft park management plans are carefully reviewed against set criteria.

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

- 1. Feedback provided additional information of direct relevance to management;
- 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 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.

A summary of all feedback received and any changes arising is provided in Table 2.

Parks of Western and Central Kangaroo Island Draft Management Plan

Ninety-three survey responses and 65 written submissions were received. These submissions are registered in Table 1 below. An analysis of all feedback received and the response to this feedback is provided in Table 2. Please see graphs below Table 2 highlighting further some survey results.

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 as a written submission.

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

Question 3 and 4 in the survey involved survey respondents rating the themes and objectives of the draft plan on a scale of 1 to 5 (1 being strongly don't support and 5 being strongly support). Figures 1 and 2 show the results from these questions with a corresponding paragraph summarising results and the response to this feedback.

Table 1 - Register of submissions

Submission Number	Name	Background
1	David Gillieson	Interested individual
2	Ted Baker	Interested individual
3	Australasian Cave and Karst Management Association Inc.	Interest group
4	Jim Geddes	Hanson Bay Wildlife Sanctuary
5	Jayne Bates	Local community member
6	James and Hayley Baillie	Founders Southern Ocean Lodge
7	Catherine Murphy	Local community member
8	Sophie Petit	Interested individual
9	Andrew and Alison (surname not provided)	Interested individuals
10	Deborah Laver	Interested individual
11	Elizabeth Walsh	Park visitor
12	Peter Owen	The Wilderness Society (South Australia)

Submission Number	Name	Background
13	Name anonymous	Local community member
14	Sabrina (surname not provided)	Park neighbour
15	Lyn Dohle	Local community member
16	Graeme Casey	Environmental volunteer
17	Shane Bates	Local community member
18	Lorraine Thomas	Interest group
19	Andy Gilfillan	Local community member
20	Robyn Coleman	Interested individual
21	Paul Smith	Interested individual
22	Andy (surname not provided)	Local community member
23	Name anonymous	CFS volunteer
24	Name anonymous	Local community member
25	Name anonymous	Local community member
26	Name anonymous	Local community member
27	Simon C.	Park visitor
28	Rosalie Bell	Local community member
29	Susan Soong	Park visitor
30	Name anonymous	Local community member
31	Tim Buck	Local community member
32	Kate Buck	Local community member
33	Carolyn Fraser	Ex local community group
34	Caleb Pratt	Local community member
35	Name anonymous	Park neighbour

Submission Number	Name	Background
36	S. M. Duka	Local community member
37	Robert Kelly	Local community member
38	Daniel (surname not provided)	Local community member
39	Ben Gaskin	Local community member
40	Robbo (Adam) Robson	Local community member
41	Mark Bowden	Local community member
42	Paul Cox	Park neighbour
43	Travis Bell	Local community member
44	Greg Harvie	Local community member
45	Nicoli Ackland	Local community member
46	Billo (surname not provided)	Park visitor and local community member
47	J. Holland	Local community member
48	Mike Slade	Local community member
49	Alicia Tremaine	Local community member
50	Name anonymous	Local community member
51	Name anonymous	Local community member
52	Marina Gregor	Local community member
53	Name anonymous	Local community member
54	Guy D.	Interested individual
55	Sue Slater	Park visitor
56	Sally Mclean	Park visitor
57	Name anonymous	Interested individual
58	Sue Florance	Local community member

Submission Number	Name	Background
59	H. F.	Park visitor
60	Rick Morris	Park neighbour
61	Name anonymous	Park neighbour
62	Christine F. B.	Park visitor
63	Austin	Park visitor
64	G. M. C.	Park visitor and local community member
65	P. Smith	Local community member
66	Dave Gillieson	Park visitor and local community member
67	Ali K.	Park visitor
68	Jane Renwick	Local community member
69	Name anonymous	Local community member
70	N. W.	Local community member
71	Jamie (surname not provided)	Local community member
72	Janet Walton	Park visitor
73	Sara Hourez	Local community member
74	Nick B.	Local community member
75	Peter Heylen	Interested individual
76	Lee Marling	Interest group
77	Glenn Gale	Park visitor
78	Wendy Wallace	Local community member
79	Simon Veitch	Local community member
80	Nathan Bell	Local community member
81	Bol (surname not provided)	Interested individual

Submission Number	Name	Background
82	Name anonymous	Local community member
83	Graham Davies	Interested individual, local community member
84	Name anonymous	Park visitor
85	Greg Davis	Local community member
86	Jennifer Washington	Park visitor
87	Nealed (surname not provided)	Park visitor
88	Darren Longbottom	Interested individual
89	Jane Paterson	Interested individual
90	Sally Owen	Local community member
91	Wapi Haberberger	Park visitor
92	Grace Byass	Local community member
93	Andrew L.	Park visitor
94	Glen Willson	Local community member
95	Name anonymous	Interested individual
96	B. Norris	Environmental volunteer
97	Steve Morvell	Local community member
98	P. W.	Local community member
99	Name anonymous	Interested individual
100	Name anonymous	Interested individual
101	Jennifer Hiscock	Environmental volunteer
102	Delene (surname not provided)	Interested individual
103	Liz Millington	Park visitor
104	Name anonymous	Interested individual

Submission Number	Name	Background
105	Jane Thompson	Interested individual
106	Eva Squire	Individual
107	Jean Turner	Individual
108	Joanne Baulderstone	Individual
109	Ingereth Macfarlane	Local community member
110	Margaret Sprigg	Local community member
111	Delene Weber	Interested individual
112	Rodney Harrex	South Australian Tourism Commission
113	Frank Campbell	Local community member
114	Peter Hastwell	Park visitor, an interested individual, a local community member and an environmental volunteer
115	Geoff and Margi Prideaux	Local community members
116	Caroline Paterson	Local community member
117	Kathie Stove	Local community member
118	Peter Martin	KI Conservation Landowners Association
119	Threatened Plant Action Group	Interest group
120	Tim Reynolds	Individual
121	South Australian Apiarists' Association Inc.	Interest group
122	Bernard Stonor	Local community member
123	Beverley Maxwell	Park visitor, interested individual, local community member, environmental volunteer, interest group, non- government organisation
124	Taylor Stein	Interested individual
125	Brenton Davis	Island Beehive
126	Rodney Bell	Local community member

Submission Number	Name	Background
127	Janet A. Pedler	The Field Naturalists Society of South Australia Inc.
128	Craig Wilkins	Conservation Council SA
129	Friends of Parks KI Western Districts	Interest group
130	Alan Childs	Local community member
131	Nobuhito Ohte	Interested individual
132	Dave Chambers	Park visitor
133	Grace Byass	Local community member
134	Jason H. Preble -	Interested individual
135	Jillian Snell	Flying-fox Supporters
136	Julia Peacock	Nature Conservation Society of Southern Australia
137	Bill Borrie	Interested individual
138	Janine Mackintosh	Local community member
139	Ria Byass	Local community member
140	Deborah Sleeman	Local community member
141	Richard Glatz	Local community member
142	Frederick Bullman	Local community member
143	Min O'Neill	Local community member
144	Catherine Murphy	Local community member
145	Anita Allen	State Planning Commission
146	Clare Buswell	ASF Cave Conservation Commission and South Australian Speleological Council
147	Kevin Mott	Interested individual

Submission Number	Name	Background
148	BirdLife Australia	Interest group
149	Graham Davies	Ocean Yakka, local community member
150	Don Drake	Interested individual
151	Fraser and Mia Vickery	Local community members
152	Jim Younger	Interested individual
153	Freya Higgins-Desbiolles	Interested individual
154	Brigitte Morel	Interested individual
155	Christine Niewiem	Interested individual
156	Name anonymous	Interested individual
157	Fraser J Vickery, Caroline Paterson, Tony Geyer, Deb Laver, Peter Hammond	Kangaroo Island Eco-Action Management Committee
158	Andrew Heinrich	Kangaroo Island Landscape Board

Table 2 – Analysis of all feedback

	Comment	Submission number	Plan Amended	Proposed response	Criteria
	General support/opposition				
	Expressed general support for the draft plan	5, 6, 28, 64, 110, 112, 115, 158	No	No change required – supportive of plan.	4
	Expressed general opposition to the draft plan	7, 8, 10, 11, 12, 95, 102, 107, 108, 109, 111, 113, 114, 116, 117, 118, 119, 120, 122, 123, 124, 127, 128, 129, 130, 131, 132, 133, 135, 136, 137, 139, 138, 140, 141, 142, 143, 150, 151, 152, 153, 154, 155, 156, 157	Yes	Noted - More detail has been provided in the plan where appropriate in response to issues raised in these submissions. Please see further detail in this document for changes made.	1,2,3
]	Fire management				
	Suggested re-introducing cultural burning practices	1, 2, 86	Yes	Incorporating cultural knowledge is part of a strategy in Theme 6. Content has been added regarding where First Nations groups have aspirations to undertake Aboriginal Cultural Burning practices on national parks and reserves. NPWS's fire management program will work in partnership to help facilitate and support this. Reference to this has been added in theme 4.	3
	Expressed the view that the plan should recognise the influence of Aboriginal people on the past landscape	1	No	Aboriginal people's presence and connection to the Island is covered in Theme 6	5
	Expressed the view that fire management by First Nations People is not appropriate for KI	8, 111, 118, 129, 148, 151, 157	No	First Nations people and groups do have a cultural connection with KI, and aspirations for its land and fire management. This aspect of fire management helps NPWS contribute to DEW's commitment to reconciliation and nation-building.	7
	Opposed construction of additional fire access tracks (in Ravine de Casoars WPA)	1, 8, 10, 12, 75, 82, 89, 96, 113, 116, 129, 136, 119, 128, 109, 118, 120, 123, 127, 135, 140, 141, 148, 151, 157	No	Noted. Rationale for additional fire access tracks is provided in plan.	7

Supported construction of new fire access tracks	5, 15, 17, 21, 23, 24, 25, 28, 31, 32, 34, 40, 42, 43, 46, 49, 52, 64, 71, 94, 121, 110, 115, 126, 130, 80, 158	No	No change required – supportive of plan.	4
Expressed concern regarding Figure 14 (fire access tracks) - this area has steep terrain and perched swamps across the landscape that need to be identified along with the known locations of Phytophthora cinnamomi. Suggested inclusion of detailed aerial imagery to improve the clarity of this image.	116, 129, 148	No	Noted. Terrain, sensitive ecological sites and Pc will all be taken into account during the detailed planning stage of track construction. Map already has catchment detail included, which helps show that new tracks are proposed to mostly follow ridge lines.	6
Suggested construction of additional fire access tracks in all 15 parks in the plan	115	No	Improving and maintaining fire management infrastructure, including tracks, is adequately covered in Theme 4. Fire Access Tracks within Wilderness Protection Areas are included in the plan to meet the requirements of the <i>Wilderness Protection Act 1992</i> regarding new infrastructure. The development of NPWS Kangaroo Island Fire Management Plan will consider the inclusion of the full range of mitigation strategies available for implementation by the NPWS, including additional fire access tracks.	5
Suggested including a strategy for Phytophthora hygiene in theme 4 - managing fire.	116	Yes	Phytophthora is addressed in Theme 1, however a reference to fire management activities has been added.	5
Supported regular prescribed/mosaic burning	1, 14, 19, 21, 25, 28, 43, 46, 50, 52, 57, 64, 71, 121, 110, 115, 126, 130, 80	No	No change required – supportive of plan.	4
Opposed regular prescribed/mosaic burning	1, 8, 12, 91, 96, 128, 141, 113, 126, 127, 135, 140, 157	No	The development of NPWS Kangaroo Island Fire Management Plan will consider the inclusion of the full range of mitigation strategies available for implementation by the NPWS, including the use of prescribed burning.	7
Supported a larger number small mosaic burns rather than larger mosaics	147	No	Outside the scope of this park management plan. The development of NPWS Kangaroo Island Fire Management Plan will consider the inclusion of the full range of mitigation strategies available for	6

			implementation by the NPWS, including the use of prescribed burning. Methods of prescribed burning are carefully planned in the context of the landscape to optimise results.	
Suggested conducting further research into the effect of fire on Kangaroo Island ecosystems and biodiversity before conducting prescribed burning. Expressed the view that unexamined assumptions are made about the inherent value of regular prescribed burning, without the underlying information.	8, 10, 89, 116, 129, 109, 140, 148, 151, 157	No	The NPWS Fire Management program uses the best available global, national and local science, data and knowledge to implement best-practice fire management for South Australia's parks. The program also manages the States' spatial database on fire, and undertakes monitoring, evaluation and research. Fire management plans are developed based on this information and adapted to account for new information. Learning lessons from each event is an important part of managing fire, which goes towards helping to reduce the impact of future bushfires and keeping communities safer, as well as maintaining biodiversity.	6
Supported proposed dams/water tanks for fire fighting	17, 64, 99, 129, 121, 110, 158	No	No change required – supportive of plan.	4
Suggested the inclusion of an objective for water storage and implementation in high risk areas for fire fighting	51	No	Water points locations are included in the management plan specifically within Wilderness Protection Areas to meet the requirements of the Wilderness Protection Act 1992 regarding new infrastructure. The development of NPWS Kangaroo Island Fire Management Plan will consider the inclusion of the full range of mitigation strategies available for implementation, including the maintenance and improvement of fire management infrastructure.	5,6
Highlighted the need for more detailed plans for how on ground fire management will work in each park area and how it will be funded	5, 12, 50	No	The development of NPWS Kangaroo Island Fire Management Plan will consider the inclusion of the full range of mitigation strategies available and detail the NPWS implementation.	6
Highlighted importance of ongoing maintenance of current/future fire access tracks, and suggested the inclusion of a strategy for achieving this.	5, 22, 43, 44, 49, 94, 116, 110, 115, 126	No	The development of NPWS Kangaroo Island Fire Management Plan will consider for inclusion the full range of mitigation strategies available and	5

			detail the NPWS implementation, including the improvement and maintenance of fire management infrastructure.	
Opposed the plan using the same fire management philosophy as the current 2009 Flinders Chase Fire Management Plan which is now outdated since the 2019-2020 fires	12	No	The strategies and actions are being reviewed and updated as part of the new NPWS Kangaroo Island Fire Management Plan. The overarching principles for fire management are still fit for purpose and remain unchanged.	5
Opposed fire breaks	12, 106, 113, 151, 157	No	Fire 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. Fire Breaks, when considered in a strategic context and combined with other risk mitigation strategies, can enhance and expand the range of bushfire response and suppression strategies and tactics available to the response agency. This can lead to an increased probability of successful suppression. Fire breaks are one strategy that supports NPWS meeting its obligations under the <i>Fire and Emergency Services Act 2005</i> .	7
Supported fire breaks	19, 21, 23, 34, 38, 46, 50, 70, 80, 121, 126, 79	No	No change required – supportive of plan.	4
Recommended a wide fire break be cleared annually on park land adjacent to roads or private land	110	No	The development of NPWS Kangaroo Island Fire Management Plan will consider for inclusion the full range of mitigation strategies available and detail the appropriate strategies for implementation by NPWS, including fire breaks and locations.	6
Suggested constructing more fire breaks than proposed in plan	79	No	The development of NPWS Kangaroo Island Fire Management Plan will consider for inclusion the full range of mitigation strategies available and detail the strategies appropriate for implementation by NPWS, including fire breaks and locations.	6, 9
Recommended the cutting of fire breaks in a timely manner safely ahead of a fire front	110	No	Outside the scope of this plan. Under the <i>Fire and Emergency Services Act 2005</i> the SACFS is the control agency for South Australia's bushfire response. The implementation of control lines is one such operational tactic used by SACFS in	6

			bushfire suppression, and is already provided for in the <i>Fire & Emergency Services Act 2005</i> .	
Suggested the plan support back-burning in order to halt an active fire	99, 110, 130	No	Outside the scope of this plan. Under the <i>Fire and Emergency Services Act 2005</i> the SACFS is the control agency for South Australia's bushfire response. Back-burning is one such operational tactic used by SACFS in bushfire suppression, and is already provided for in the <i>Fire & Emergency Services Act 2005</i> .	6
Suggested the inclusion of a strategy to reduce the risk of fires in parks from impacting on neighbouring properties	28, 30, 52, 74	No	Theme 4 has a strategy to partner with neighbouring landholders, the community and the Country Fire Service to help reduce bushfire risk.	5
Suggested allowing fire retardant dropping	110	No	Outside the scope of this plan. Under the <i>Fire and Emergency Services Act 2005</i> the SACFS is the control agency for South Australia's bushfire response. Using retardant is one such operational tactic used by CFS in bushfire suppression, and is already provided for in the <i>Fire and Emergency Services Act 2005</i> , and is in line with Wilderness Code of Management.	6
Suggested having at least one professional paid fire fighter per firefighting unit	110	No	Outside the scope of this plan. Under the <i>Fire and Emergency Services Act 2005</i> the SACFS is the control agency for South Australia's bushfire response. Bushfire response and how firefighting units are crewed is a matter for SACFS. Note that the NPWS regards all firefighters as professional regardless of volunteer or paid status.	6
Supported draft plan's overall fire management strategies	24, 28, 58, 68, 85, 94, 130	No	No change required – supportive of plan.	4
Expressed the view that fire management should be included in all aspects of the plan	26, 41, 43, 45	No	Fire management is identified as a key theme in the plan with associated objectives and strategies. It is not considered necessary to incorporate additional detail across the whole plan in a strategic document such as this.	7
Expressed the view that fire management needs to be the first priority of this plan	26, 30, 41, 43, 45, 52, 80	No	Strategies are not listed in order of importance.	7

Opposed all fire management	8	No	Opposition is noted. Fire management is critical to lessen the risk, intensity and spread of bushfires and make suppression more achievable and safer.	7
Supported letting fires burn naturally (depending on conditions), only supressing when they get to park boundaries	75	No	Outside the scope of this plan. Under the <i>Fire and Emergency Services Act 2005</i> the SACFS is the control agency for South Australia's bushfire response. The consideration of bushfire response and tactics are for the control agency's determination.	6
Expressed a need for better command and control procedures for park staff in the event of a fire, particularly for decision making	50, 69, 110, 130	No	Outside the scope of this plan. Under the <i>Fire and Emergency Services Act 2005</i> the SACFS is the control agency for South Australia's bushfire response. The NPWS Brigade is a group within the SACFS and contributes to bushfire response under the SACFS as brigade members.	6
Suggested rebuilding a fireproof Flinders Chase Visitor information centre.	55	No	The new building design for the Flinders Chase Visitor Centre will take bushfire safety into account, and will be compliant with all relevant building regulations. There is no recognition of a fireproof building in the Australian Building Codes Board.	7
Suggested providing extra fire protection for wildlife parks and Raptor Domain.	55	No	Private land is not in scope for this plan.	6
Suggested installation of fireproof shelters throughout the island, and to design built assets to survive fires	55, 69	No	Private land is outside the scope of this plan. All assets on parks are designed to meet bushfire safety requirements. It is worth noting that there is no recognition of a fireproof building in the Australian Building Codes Board.	6
Highlighted the importance of an adaptive management approach for fire management	64, 110	No	Noted. NPWS Fire Management program use the best available global, national and local science, data and knowledge and adapt our plans based on this knowledge.	5

			The program also manages spatial data relating to fires and fire management for the State, and undertakes monitoring, evaluation and research. Learning lessons from each event is an important part of managing fire, which goes towards helping to reduce the impact of future bushfires and keeping communities safer, as well as maintaining biodiversity.	
Emphasised that fire management must be based on scientific evidence not opinions	106, 113, 129	No	NPWS Fire Management program use the best available global, national and local science, data and knowledge and adapt our plans based on this knowledge. The program also manages spatial data relating to fires and fire management for the State, and undertakes monitoring, evaluation and research. Learning lessons from each event is an important part of managing fire, which goes towards helping to reduce the impact of future bushfires and keeping communities safer, as well as maintaining biodiversity.	5
Suggested that firefighting strategies should include prompt access to air tankers	8, 12, 99, 116, 129, 136, 119, 109, 110, 118, 126, 130, 148	No	Out of scope for this plan. Under the <i>Fire and Emergency Services Act 2005</i> the SACFS is the control agency for South Australia's bushfire response. Access to and the deployment of aircraft is one such resource used by SACFS in bushfire suppression when deemed appropriate.	6
Suggested incorporating habitat requirements and age class structures for biodiversity in fire management activities – including a strategy for this	116, 129, 148	No	The development of the NPWS Kangaroo Island Fire Management Plan will consider bushfire risk to environmental assets and any ecological needs for maintaining biodiversity. Any appropriate strategies and detail will be documented in the NPWS Kangaroo Island Fire Management Plan.	6
Suggested providing park managers with more strategies/options for fire management	110	No	The development of the NPWS Kangaroo Island Fire Management Plan will consider for inclusion the full range of mitigation strategies available and detail the strategies appropriate for implementation by NPWS.	6
Supported modifying fuel loads	115	No	No change - supportive of plan	4

Supported a landscape approach to fire management – fires do not follow borders	115	No	No change - supportive of plan	5
Expressed the need to detail how DEW will "partner with neighbouring landholders, the community and the Country Fire Service to help reduce bushfire risk" (page 23) – how will this happen and what will be considered	115	No	The development of the NPWS Kangaroo Island Fire Management Plan will consider for inclusion the full range of mitigation strategies available, including partnerships, and detail the strategies appropriate for implementation by NPWS.	6
Recommended adding First Nations people and ecologists to "Partner with neighbouring landholders, the community and the Country Fire Service to help reduce bushfire risk" (page 23)	100, 108	Yes	Content adjusted in point 1.	1
Recommended adding Environment Non-Government Organisations to "Partner with neighbouring landholders, the community and the Country Fire Service to help reduce bushfire risk" (page 23)	129	No	Addressed in point 3 of page 23.	5
Expressed concern about the lack of financial commitment to implement proposed fire management actions	115	No	Park management plans are high level strategic documents. Providing detail on resourcing for implementation is outside the scope of the plan.	6
Suggested including reference to lighting strikes	115, 126	No	Out of scope. Bushfire ignition sources will be considered in the development of the new NPWS Kangaroo Island Fire Management Plan.	6
Suggested putting fire towers up throughout parks	143	No	Support for the early detection of bushfires is noted The development of the NPWS Kangaroo Island Fire Management Plan will consider for inclusion the full range of mitigation strategies available, including early bushfire detection, and detail the strategies appropriate for implementation by NPWS.	6
Suggested alternative fire control strategies such as creating broad areas of low, mown firebreaks (that retain cover, diversity of plant species)	127	No	Support for fuel management strategies is noted. The development of the NPWS Kangaroo Island Fire Management Plan will consider for inclusion the full range of mitigation strategies available, include vegetation management, and detail the strategies appropriate for implementation by NPWS.	6

Supported the maintenance and strengthening of the East and West Melrose Tracks as the boundary of Flinders Chase National Park	148, 151	No	No change – supportive of plan	4
Conservation				
Species and ecosystems				
Suggested including specific strategies/actions for threatened species mapping and monitoring	8, 11, 102, 107, 111 116, 129, 136, 123, 148, 157	No	Monitoring and research to inform management is addressed in Theme 1.	5
Suggested that no vegetation clearance should be permitted to keep vegetation un-fragmented	8	No	Conservation is a priority in the plan. There is legislation and regulations in place to govern the clearance of native vegetation.	6
Supported improving knowledge of flora and fauna to inform conservation management	136	No	This is adequately covered in Theme 1 strategy - Use monitoring and research to inform management and climate change adaptation actions for vulnerable species and ecosystems.	5
Expressed criticism for not including fungi as well as invertebrates, soil microorganisms, and other missed key groups (e.g., raptors, reptiles).	8, 116, 129	Yes	Strategies and objectives are provided at a strategic level to guide conservation and management at all scales. Content has been added the plan to clarify the strategic nature and use of certain species as examples, rather than providing an exhaustive list.	3
Suggested changing the plan's focus from a few species to ecosystems and ecosystem scale conservation	8, 129, 136, 119, 109	No	The plan provides example species but strategies and objectives are provided at strategic level to guide conservation and management at all scales. The plan provides the framework for management actions to protect and restore vulnerable species and ecosystems and manage pest plants, animals and disease. The management actions will contribute to the health of ecosystems and ecosystem services at a landscape scale.	5

Expressed the view that providing outstanding park experiences is best done by maintaining the integrity of ecosystems	8, 52	No	This is adequately addressed in Theme 1 of the plan.	9
Suggested amending the plan to say that any development must avoid unnecessary fragmentation of vegetation. Suggested giving greater emphasis to the role of large intact functioning ecosystems in protecting wildlife.	9, 12	Yes	Fragmentation is generally a landscape-scale issue and developments operate at relatively small scales. Additional content has been added to the plan to articulate that development is confined to clear Visitor Use Zones, with the remaining areas zoned conservation.	3
Suggested replanting vegetation that has not recovered from the fires	55	No	This issue is adequately addressed in Theme 1.	5
Supported conservation management of the glossy black-cockatoo in partnership with the Kangaroo Island Landscape Board	64	No	No change required – supportive of plan.	4
Recommended listing and providing direction and strategies for more/all listed threatened species, ecological communities and habitats, not just the few listed in the plan. Questioned why the plan selects just a few of the threatened species and suggestions of providing recovery plans for threatened species.	100, 107, 108, 116, 129, 148, 157	Yes	Content has been added to the plan to clarify that the examples provided are not intended to be exhaustive lists. The plan currently has objectives to manage natural areas to conserve wildlife, recover priority species, and maintain ecosystem health. Providing direction for all threatened species is outside the scope of a strategic document such as this plan. Threatened species recovery plans are prepared by Federal and State government agencies and key stakeholders.	3
Suggested including reference to more threatened birds not just coastal raptors: e.g. beach-nesting birds (Hooded Plovers, Fairy Tern and other Tern species) and migratory shorebirds which are listed collectively under the EPBC Act and individually under the APBC Act and the National Parks and Wildlife Act SA. These include the KI Western Whip-bird, KI Southern Emuwren, KI Brown-headed Honeyeater and KI White-eared Honeyeater, KI Shy Heathwren, KI Little Wattlebird, KI Striated Thornbill and KI Crimson Rosella, Western Beautiful Firetail and Western Bassian Thrush. Pied Oystercatchers	107, 129, 148	Yes	As a strategic document, the plan provides examples of species in certain categories and is not required to provide a full list of species. This language has been clarified in the document.	3

Recommended including specific reference to Hooded Plovers and including a strategy for their protection	107, 116, 129, 148	Yes	Reference to hooded plovers has been added to the body of Theme 1. The plan currently has objectives to manage natural areas to conserve wildlife, recover priority species, and maintain ecosystem health. Listing all species and subordinate plan requirements is not necessary in a strategic plan of this type. This language has been clarified in the document. A South Australian Recovery Plan for the Hooded Plover was prepared in 2006.	3
Suggested mentioning the 16 KI endemic sub-species of bush birds and other bird species which have their core SA habitat on KI (e.g. on p. 11).	107	Yes	The plan identifies the conservation of endemic and threatened species and communities as a priority for park management. A list of endemic species has been added as an Appendix.	3
Suggested conducting a post-fire threat assessment for vulnerable birds – state the priority of managing bird species recovery in the burned areas and their protection in unburned refuges of parks covered by this plan	107, 148	No	The plan includes objectives to manage natural areas to conserve wildlife, recover priority species, and maintain ecosystem health and strategies regarding monitoring and research to inform management for vulnerable species and ecosystems. The detail requested here is out of scope for a strategic plan.	6
Recommended recognising the significance of the unique large, unfragmented areas of intact, functional eco-systems in the some of the parks in 'what are we looking after' list/significance and purpose section	129, 109, 157	Yes	Additional wording has been added to the "What we are looking after' section of the plan.	3
Suggested including a dot point recognising KI as a Migratory Shorebird Habitat of National Significance (regularly supports over 0.1% of the flyway populations of five migratory shorebirds including: Sharp-tailed Sandpiper, Red-necked Stint, Ruddy Turnstone, Grey Plover and Double-banded Plover) in 'What are we looking after' section.	148	Yes	Additional wording has been added to the "What we are looking after' section, and to the section on Cape Gantheaume CP and WPA.	3
Recommended emphasising wetlands of National significance including Murray Lagoon, and D'Estrees Bay in Cape Gantheaume WPA and Grassdale Lagoons in Cape Bouguer WPA, and mentioning them in 'What are we looking after' section	8, 116, 129, 135, 148	Yes	The plan currently refers to Grassdale Lagoons and Murray Lagoon as a Wetland of National Importance. Additional wording has been added to the "What we are looking after' section	3

Suggested mentioning coastal raptors in 'what are we looking after' section	116, 129	No	Endemic ad threatened fauna is currently included in this section and further information on coastal raptors is provided in theme 1.	5
Suggested mentioning the species of extremely rare and threatened land snails endemic to KI – their entire known habitat was burnt in the 2019-2020 bushfires	129	Yes	The plan currently has objectives to manage natural areas to conserve wildlife, recover priority species, and maintain ecosystem health. Listing all species and subordinate plan requirements is not necessary in a strategic plan of this type. This language has been clarified in the document.	3
Suggested mentioning Logania insularis (which could be significantly impacted by further tourist development at Cape Borda), As well as Gahnia halmaturina, Asterolasia phebalioides, Asperula tetraphylla	136, 119, 120	Yes	The plan currently has objectives to manage natural areas to conserve wildlife, recover priority species, and maintain ecosystem health. Listing all species and subordinate plan requirements is not necessary in a strategic plan of this type. This language has been clarified in the document.	3
Suggested the discussion of Theme 1 should acknowledge the importance of diverse age class structures, invertebrates, nectar resources and fungi which are critical resources for birds and other species	148	Yes	Reference to the need for a variety of vegetation age classes and biodiversity has been added to the section on flora and fauna dependencies.	3
Suggested including better strategies to protect the old growth forests on KI.	131, 134	No	The plan already contains objectives to manage natural areas to conserve wildlife, recover priority species, and maintain ecosystem health.	5
Expressed the view that observing sea lions is not a conservation priority – suggested removing this objective from theme 1 and placing into theme 3	8, 129, 157	No	Theme 1 addresses the importance of conserving sea lions and details that consideration must be given to the demands of visitation	5
Suggested emphasising the number of river estuaries flowing out to the sea along the Parks' coast as another significant "aquatic environment"	107	Yes	Estuaries in Flinders Chase NP are referenced. Reference to estuaries has been added to <i>What are we looking after?</i>	3
Questioned why the Kangaroo Island narrow-leaf mallee woodland is highlighted for Beyeria Conservation Park only and not for other parks (Page 7 paragraph 4)	107	No	Within the parks of central and western KI the narrow-leaf mallee woodland is a dominant component only in Beyeria CP.	8

Expressed concern over inadequate information about pest plant, animal and disease species and management	10, 11, 12, 83, 89, 96, 129, 139, 106, 123, 157	No	It is not necessary to list all information relating to day-to-day operations of pest plant, animal and disease management in a strategic document of this type. Priority pest plant and animal species and disease are described in the strategies in Theme 1. Operational plans will describe approaches to manage pests and diseases.	6, 9
Recommended identifying where grazing pressure may be an issue and devising non-lethal strategies to manage it before it is too late	8	No	Out of scope for a strategic document of this type. The plan includes a strategy to monitor total grazing pressure and implement management response as required.	6
Questioned the vagueness of the statement 'Where native species are having an impact on ecological values, management may be required to mitigate these impacts'	157	No	The subsequent sections of the plan expand on the statement referenced in this comment, with reference to koalas, kangaroos and wallabies and the need to manage grazing pressure from these native species.	5
Recommended explicitly mentioning biosecurity issues. Identify biosecurity strategies to contain diseases, pathogens and seeds.	8, 141	No	The plan refers to management of phytophthora as it is an existing threat to the parks. Monitoring specifically for biosecurity issues is outside the scope of park management plans. Within the park, ongoing monitoring of pest plants and animals provides an opportunity for issues to be identified and addressed early.	5, 6
Suggested identifying European Honeybees as a pest and identifying management options	8, 129, 157	No	The plan refers to the Department's policy on bees in parks.	7
Suggested mentioning grazing pressure on native flowering plants by feral bees	157	No	The plan refers to the Department's policy on bees in parks.	7
Suggested including mention of pest plants in sandy beach ecosystems, especially introduced coastal grasses such as Sea Wheat-grass and Marram grass, which impact on the "open" breeding sites needed by beach-nesting birds (Hooded Plovers) and change and destabilise coastal dune structure	107	No	Weeds and threats are addressed in the plan. Specific locations for on-ground action will be addressed through operational plans.	5

Suggested mentioning pests including Tasmanian bluegum wildlings, Albyzia, introduced Bridal Creeper, Bridal Veil, Monodenia orchids, pines and Cape Leeuwin	116, 129	No	Priority pest plants and animals are identified in the plan. Additional information on other species will be addressed through operational plans.	5
Suggested including a strategy for controlling Tasmanian Blue Gums	116, 129, 136, 119, 109	No	The plan contains a strategy for blue gum - Develop a strategy for emerging invasive issues activated by the 2019-20 bushfires, such as (but not limited to) Tasmanian blue gum (Eucalyptus globulus).	5
Suggested mentioning pest animals including blackbirds, starling and sparrows or overabundant native birds including Little Corellas	116, 129, 148	No	Pest birds are addressed in the plan through the strategy to monitor pest animals.	5
Supported inclusion of specific strategies to monitor, control and where appropriate eradicate invasive and pest species	148	No	No change – Supportive of plan	4
Suggested including invertebrate pests	129, 157	No	Pest species and the threats they pose are adequately addressed in the plan.	5
Suggested a strategy for eliminating feral cats	55	No	Pest species are adequately addressed in plan	5
Supported monitoring and management of kangaroos and wallabies	64, 119, 136, 158	No	No change – Supportive of plan	4
Supported controlling koalas – suggested identifying more specific strategy for managing koala numbers and density	8, 64, 136, 119, 158	No	Supportive of plan. Specific strategies for managing numbers and density would be planned at an operational level.	3, 6
Suggested allowing koala numbers to increase naturally and planting more koala friendly trees	55	No	The koala population is expected to increase as the vegetation regenerates naturally. Planting specific species may change vegetation community structures and is not appropriate within the parks.	7
Emphasised the importance of keeping forestry plantations away from key wilderness areas	69	No	Out of scope for a park management plan	6
Suggested including strategies for managing disturbance to coastal habitats, or visitor management to reduce disturbance impacts on coastal species at	107, 116, 129, 148	No	The plan currently has objectives to manage natural areas to conserve wildlife, recover priority species, and maintain ecosystem health. Park facilities and infrastructure are sustainably designed, constructed	5

critical times (breeding of resident birds; pre-migration fattening of migratory species).			and operated, minimising impacts on the natural environment. Seasonal visitor access restrictions are also imposed where required to minimise disturbance to sensitive habitat sites and to assist in the recovery of wildlife.	
Suggested addressing in detail threats to, and conservation requirements of, all priority species and populations of priority species in these parks	136, 119, 120	No	The plan adequately addresses threats and conservation. Additional detail is not required for a strategic document of this type.	5
Climate change				
Suggested placing more focus on climate change in the plan	69, 94, 129, 120, 123, 142, 143	Yes	Additional information has been added to the plan regarding Climate Change.	3
Supported long-term monitoring to investigate the impact of climate change and other pressures on natural values	129, 119, 109, 157	No	No change – supportive of plan	4
Suggested including stronger strategies for monitoring of climate change impacts	107, 116, 129, 136, 123, 127	No	Monitoring and adapting to the impacts of climate change is addressed in the plan at a strategic level.	5, 7
Suggested extending climate change strategies to include research into its potential effects on the frequency and ferocity of fires.	157	No	Out of scope for a strategic document of this type. This level of detail will be covered in the new NPWS Kangaroo Island Fire Management Plan.	6
General environmental values				
Expressed the view that the environment should be valued for what it is and not as something to be sold	73	No	Noted	9
Recommended mentioning in the plan that Kangaroo Island is one of only 15 Biological Hotspots in Australia as well as a Key Biodiversity Area (KBA) (suggestion to include this in 'What are we looking after')	116, 129, 135, 148, 150, 157	Yes	A reference to biodiversity and KBA hotspot has been added to the plan.	3
Questioned why the theme 'Maintaining wilderness quality' only relates to the Wilderness Protection Areas	8, 89, 96, 129, 148, 157	No	Only relates to WPA's as the objectives of wilderness management in the South Australian Code of Management for Wilderness Protection Areas and Zones is to maximise the naturalness and	7

			remoteness, i.e. the wilderness quality, of wilderness areas.	
Suggested further emphasising the state, national and international significance of Flinders Chase National Park	148	No	The significance of the parks is adequately detailed in the plan.	5
Suggested considering including Flinders Chase National Park with the WPA section (Theme 2)	9	No	It is not appropriate to include Flinders Chase National Park in this theme as Theme 2 is specific to WPAs	7
Expressed the view that the concept of "Wilderness" is problematic, genocidal, and ignores the ongoing part humans need to play in maintaining ecological integrity. Suggested replacing the term "Wilderness qualities" with "ecological values", and that Indigenous fire management and sustainable use of resources be adopted as a core principle of these areas	64	No	The language is consistent with the South Australian Code of Management for Wilderness Protection Areas and Zones. Indigenous fire management is adequately addressed in the plan.	5
Themes, strategies and objectives				
Supported "Conserving wildlife and ecosystems" and "Maintaining wilderness quality" being the first and second themes of the plan	107, 120	No	No change – however it should be noted that Themes are not listed in order of priority.	7
Supported theme 2 text, objectives and strategies	12	No	No change – supportive of plan	4
Suggested that the page 10 challenges and opportunities dot point 7: 'Maintaining wilderness quality and the priority conservation values and species of the parks' should be the first dot point listed	8, 129, 119, 157	No	The challenges and opportunities are not listed in priority order	7
Opposed "while also providing opportunities for low impact visitor use and enjoyment" in theme 2 text and objective – there should be a theme that focuses solely on preservation of nature	88, 95, 100	No	Theme 2 requires management consistent with The South Australian Code of Management for Wilderness Protection Areas and Zones, with the Objectives of wilderness management to maximise the naturalness and remoteness (i.e. the wilderness quality) of wilderness areas. Theme 1 also addresses conserving wildlife and ecosystems and includes the WPA's.	5, 7

Park network				
Suggested referencing the relationships between individual parks, and describing the context of each park and park complex, its base natural values, its connections, its current condition, whether it was recently fire affected, and the condition/conservation value of land surrounding it.	127, 148	No	The plan addresses this information in the significance and purpose section and in the mapping sections, at a strategic level.	5
Suggested describing each reserve's position in the landscape, and whether it contains inland/sub coastal/coastal, freshwater swamps and watercourse habitat, fragmented or unbroken reaches of wilderness areas between conservation areas. Better describe natural vegetation types, soil and geological formations. Describe adjoining land and natural habitat under formal, informal, private or crown or state protection or of land with no protection. Describe land use on adjoining land	127	No	The plan addresses this information in the significance and purpose section and in the mapping sections, at a strategic level.	5
Suggested describing the importance of the continuity of habitat between Flinders Chase NP, Ravine des Casoars Wilderness Protection Area (WPA), Cape Bouguer WPA, and Kelly Kill Conservation Park (CP)	148	Yes	The plan has been amended to incorporate this language	3
Suggested including more details about the value and contribution of smaller parks	140	No	Information regarding each park is addressed in the significance and purpose section.	5
Suggested better acknowledging the diversity of the parks, their values, biological diversity, ecosystems, all State and Federally listed threatened species, or the threats and challenges to direct appropriate management	157	No	Information regarding each park is addressed in the significance and purpose section. Listing all threatened species is outside the scope of a strategic plan.	5
Fire				
Suggested describing the condition of the parks before the 2019-20 fire and which were burnt, the extent of the damage to the natural systems and the extent of recovery underway	127	No	Fire impacts are covered at a strategic level in plan. A fire scar map showing fire extent is also included in the plan. Further detail out of scope for this plan.	5
Suggested committing to monitoring fire recovery of ecosystems in the plan	157	No	Monitoring and research to inform management is adequately covered in the plan.	5

			Learning lessons from each event is an important part of managing fire, which goes towards the NPWS Fire Management program helping to reduce the impact of future bushfires and keeping communities safer, as well as maintaining biodiversity.	
Suggested providing a specific reference to the importance of retaining the natural values of unburnt natural areas following the 2019/20 fires in Theme 2	148	No	The plan addresses the goal of maintaining and improving the quality and extent of habitat. The development of NPWS Kangaroo Island Fire Management Plan will consider and identify environmental assets. This details the strategies appropriate for implementation by NPWS.	5
Opposed allowing tourists to return to major geological points of interest before the infrastructure that was there before the fires can be rebuilt and protect the recovering vegetation from more impacts	127	No	Noted. The plan addresses management of natural areas to conserve wildlife, recover priority species, and maintain ecosystem health. Theme 3 refers to the rebuild and enhancement of visitor facilities. Timing of tourist return is an operational decision and outside the scope of this plan.	5, 6
Other				
Supported the statement that 'the conservation of endemic and threatened species is a priority of park management' and the plan's coverage of the issues facing KI reserves	12	No	Supports this aspect of the plan	4
Suggested providing more detailed, specific and up to date information on the "biodiversity assets" which underpin this document, and providing more "management options" detail to inform and park management.	107	No	Detailed and prescriptive information is out of scope for a strategic document of this type. Operational plans will include detail on management actions and locations.	6
Recommended using the KI Landscape Board searchable database of biological resources of Kangaroo Island	129	No	Detailed and prescriptive information is out of scope for this strategic document. Collaborating with Landscape Board is adequately covered in plan.	5, 6
Suggested increasing/committing to funding for ecosystem conservation management actions in the plan	8, 91, 101, 107, 116, 129, 136, 119, 117, 120, 142	No	Funding and resource allocation is beyond the scope of this plan.	6

Expressed concern that staffing requirements to achieve listed conservation actions in plan are not detailed	82, 117, 142	No	Funding and resource allocation is beyond the scope of this plan.	6
Suggested incorporating infrastructure to help minimise the impact on the environment	73	No	This is adequately addressed in the plan in Theme 3 and Theme 2.	5
Suggested including an objective about the role of science-based monitoring and scientific research	123, 127, 142	No	The plan already includes a number of strategies for monitoring and research to inform management	5
Suggested including more strategies for education on conservation.	83	No	The plan includes reference to learning experiences in the text of Theme 3.	3
Suggested hiring and training more scientific and technical staff, field workers, rangers, educational officers, and locally based volunteer initiatives to help support Kangaroo Island's protected areas	153	No	Funding and resource allocation is beyond the scope of this plan.	6
Zoning and mapping				
Expressed concern about current zoning, which is unclear, open ended and allows development in inappropriate locations. Recommended providing more restrictions, explanation and maps about zoning, and where low impact activities are allowed outside of Visitor Use Zones	1, 8, 10, 12, 27, 89, 96, 100, 101, 111, 116, 129, 136, 119, 128, 109, 120, 124, 134, 135, 140, 151, 153, 157	Yes	Additional detail on zoning has been added to text and maps	3
Suggested more clearly showing where tourist accommodation is envisaged	112, 157	No	The plan addresses tourist accommodation clearly through zoning and mapping of these sites	5
Suggested mapping and providing separate zones for bushfire recovery in areas of high intensity and identify protection measures for these areas	116, 157, 129	No	Beyond the scope of this plan. Fire management approaches will be described in the Fire Management Plan.	6
Expressed concern that there are no zones for biodiversity conservation - suggested providing zones for biodiversity conservation with no development allowed	96, 116, 129, 136, 119, 106, 109, 120, 123, 148, 151, 157	Yes	The final plan has been amended to include clarification that all areas are zoned for conservation unless specifically allocated in another zone. Conservation zones only allow for low impact use, as described in the 'Developing this plan' section.	3

Believed 'low impact' uses in plan are in fact high impact uses and should be further restricted	8, 89, 100, 129, 136, 119, 128, 108, 109, 120, 151, 157	Yes	Text and mapping detail has been added to the plan to define camp areas into Visitor Use Zones.	3
In particular, opposed fire pits as a low impact activity permitted in protected areas	8, 27, 129, 109, 127, 143	No	Fire pits are seasonal use only, and are provided within select visitor use zones	7
Suggested "low impact" needs to be clearly defined	95, 96, 100, 106, 108	Yes	Text has been added to the 'Developing this plan' section and mapping detail has been added to the plan to define camp areas into Visitor Use Zones.	3
Suggested limiting visitor use zones to areas with existing anthropogenic disturbance/ outside of parks	91, 129, 136, 100, 108, 109, 151, 153, 157	No	The majority of Visitor Use Zones cover existing footprints of activity.	5
Suggested making entire reserve system a conservation zone (excluding existing infrastructure)	8, 129	Yes	The plan has been amended to clarify that all areas are zoned for conservation unless specifically allocated in another zone. Conservation zones allow for low impact use described in 'Developing this plan' section.	3
Expressed a desire for the integration the zones proposed for the KI parks with the <i>Planning</i> , <i>Development and Infrastructure Act 2016</i>	136, 119, 120	No	The Visitor Use Zones that stipulate Tourist Accommodation are aligned with <i>the Planning</i> , <i>Development and Infrastructure Act 2016</i> as required by this type of development. Other zones in the plan do not require such alignment.	7
Recommended mapping wilderness quality across Kangaroo Island, so high quality areas of intact habitat are identified and protected from development	12, 129	No	Beyond scope of a strategic plan of this type.	6
Recommended creating exclusion around sites where threatened species are recorded or in habitat that is suitable for them to persist	157	No	Beyond scope of a strategic plan of this type.	6
Recommended that the maps in plan must show a lot more detail (e.g. where new development/accommodation is allowed – more detailed zoning, trails, existing campsites, viewing platforms, lookouts etc.)	8, 12, 89, 111, 116, 129, 109, 127, 140, 148, 151, 157	Yes	Additional detail has been added to maps.	3

Suggested maps differentiate Wilderness Protection Areas from National Parks and Conservation parks	12	No	The maps in the plan already distinguish between park types.	5
Suggested including a map that shows the location of the complete Kangaroo Island Wilderness Trail as well as locations of the campsites	12, 129	Yes	Mapping in the plan has been updated to show the current location of the Wilderness Trail and Visitor Use Zones, including campsites.	5
Use coordinates / grid references / GIS layer to define the boundaries of the various zones in all the Figures included in the Appendices section.	106	No	Highly detailed operational mapping is not considered necessary for a strategic plan of this type.	6
Suggested including aerial photography in maps	106, 116, 129	No	Aerial photography and other highly detailed operational mapping is not considered necessary for a strategic plan of this type	6
Suggested mapping vegetation structures, associations, and ages	100, 108, 116, 129	No	Highly detailed operational mapping is not considered necessary for a strategic plan of this type.	6
Suggested including fire intensity in Figure 13 to inform future management	148	No	Figure 13 is included in the plan to show the extent of the 2019/20 fire. It is not intended to be used to inform future management.	6
Expressed the view that the current map order is confusing and should be reordered by location	129	No	The order of maps relates to the discussion of that site in the text of the plan.	7
Suggested better distinguishing/defining the distinction between a 'track' and a 'trail' on the maps	129	No	Mapping legends reflect a pre-determined template to ensure consistency across all park management plans.	2
Caves and karsts				
Emphasised the importance of carefully managing human disturbance on karsts and caves	1, 8, 129, 146, 108	No	Theme 5 already addresses the importance of managing human disturbance.	9
Suggested creating an inventory of caves and their contents and having a classification system to identify suitability for different uses	1, 147	Yes	Additional text has been included in Theme 5 to address this comment.	3

Identified an error in the draft plan information: along the west coast of the island karst environments extend to 3km inland (not 1km)	1	Yes	Language has been adjusted in the plan to address this comment.	3
Recommended further protection of and further research into cave fauna	1, 3, 8, 116, 123, 129,	No	Theme 5 allows for and recognises the importance of research	5
Suggested including a strategy for research needed to manage the inflowing impacts on karsts, such as fire suppression activities and grazing pressures	146	No	Theme 5 allows for and recognises the importance of research	5
Recommended that cave infrastructure should follow best design practises, including well designed lighting systems, low impact in-cave infrastructure etc.	146	Yes	Additional language has been included in the plan to address this comment.	3
Suggested constructing modest laboratory facilities and accommodation for cave and karst researchers at Rocky River	1, 3	No	Out of scope for a strategic plan of this type	6
Expressed the importance of working collaboratively with neighbours to manage total catchment area around karst landscapes	1, 3	No	Already addressed in plan.	5
Expressed the need to better clarify how DEW will achieve the objective "Work with the Kangaroo Island Landscape Board and landholders to manage landscapes and water resources within and adjacent to the parks to minimise adverse impacts on caves and karsts."	146	No	Strategic level plans are not prescriptive to operational levels.	6
Expressed the importance of ensuring all those who conduct research in caves are qualified to do so and follow best practise	1, 3	No	Strategic level plans are not prescriptive to operational levels. Scientific research permits are required for all parks and systems are already in place at an operational level.	1
Recommended that cave and karst systems are monitored	1, 3	No	Already addressed in plan	5
Suggested monitoring water movement through the limestone of the caves to determine any effects the fine ash may have water movement and speleothem development.	147	No	Monitoring is already addressed in the plan. Detail to this level is not appropriate in a strategic plan of this type.	6

Suggested interpreting the palaeontology in cave sites, focusing not only on megafauna but also smaller animals	1, 3	No	Outside the scope of this plan. This level of detail could be incorporated into a future interpretation plan.	6
Suggested providing more walking trail options at the Kelly Hill Caves Visitors Centre	27	No	Trails in parks are addressed in the plan.	5
Suggested repairing the Harold Bell Walk and removing the Mary Burgess Walk from the KI Wilderness Trail so that it can be accessed by the public, and using them as interpretive walks for cave history and information	147	No	Outside the scope of this plan. Repairs and additions to specific trails are informed at an operational level and guided by a trails plan.	6
Opposed any further cave development	129	Yes	The plan has been updated to clarify that visitor access to caves is limited to Kelly Hill. Other caves will only be accessible by approved parties with appropriate permits. Content has also been added to the strategy relating to access to caves.	
Opposed development of cave exploration experiences. Suggested cave visitation should be limited to one cave at Kelly Hill	8	Yes	The plan has been updated to clarify that visitation experiences are limited to caves at Kelly Hill.	3
Expressed the view that rebuilding and expanding tourism, accommodation and interpretation facilities at Kelly Hill Caves should be a priority	112, 147	No	Redevelopment of the site is already addressed in the plan. This work is currently in progress.	5
Recommended a state-wide Cave and Karst Reference Committee should be established	146	No	Outside the scope of this plan	6
Recommended using virtual reality technology to ease pressures on show-cave environments	146	No	The use of this technology is an operational decision. The Kelly Hill Caves visitor experience identifies determining carrying capacities as a way of easing pressure on the show-cave.	6
Suggested expanding the last karst objective from only "palaeontological research" to all forms of "speleological research"	146	Yes	This language has been amended in the plan	3

Suggested the plan should recognise that Admirals and Remarkable Rocks are geological monuments, not simply geological features	8, 116, 129	Yes	Language in plan has been updated	2
Suggested including geological monuments in theme 5, providing strategies for conservation, and including protection of geological monuments in 'challenges and opportunities'	116, 129	Yes	Reference to geological monuments has been added under heading "What are we looking after?"	2
Noted that important palaeontology sites are also found in Kelly Hill caves	116	No	Noted - no change sought	9
Opposed the wording of "while providing visitor opportunities to experience and appreciate these environments" in the Theme 5 objective	95, 100	No	Noted – no alternatives suggested. The language in the plan is considered appropriate.	9
Suggested including karst landscapes in bullet point 11 under Objectives and strategies for Theme 1 (page 13).	147	No	Karst landscapes are addressed in Theme 5.	7
ourism				
ourism eneral				
	1, 7, 8, 9, 10, 12, 62, 73, 82, 83, 88, 89, 92, 95, 96, 101, 103, 111, 116, 129, 119, 128, 141, 146, 106, 109, 114, 117, 118, 120, 123, 127, 132, 133, 139, 140, 142, 149, 151, 131, 157	Yes	The plan has been amended to strengthen language regarding conservation aspects in plan. The mapping regarding conservation zones and visitor use zones has also been updated.	2
Expressed concern that management priorities are tourism rather than conservation driven. Need	92, 95, 96, 101, 103, 111, 116, 129, 119, 128, 141, 146, 106, 109, 114, 117, 118, 120, 123, 127, 132, 133, 139, 140,	Yes	regarding conservation aspects in plan. The mapping regarding conservation zones and visitor	7

Expressed opposition to overnight accommodation at Edward's Cottage due vehicles ruining local ambiance.	4	No	The provision of environmentally sensitive public and private development in parks allows for enhanced visitor experience and creates more opportunities for people to appreciate and enjoy parks. Consideration of potential impacts of development at individual sites is given at the detailed planning stage.	7
Expressed opposition to overnight accommodation at May's Homestead and Postman's Cottage. Suggest museum or history site instead.	4	No	This work will reinstate the pre-fire use of the cottages for overnight accommodation.	7
Expressed desire for a better explanation of the accommodation access available Edward's Cottage.	6	No	Outside the scope of this plan	6
Expressed concern that the private accommodation on the Kangaroo Island Wilderness Trail is defined in explicit detail unlike the rest of the draft management plan	9, 109, 129, 140	No	This detail is a requirement of the Planning and Design Code, regarding the designation of 'Tourist Accommodation' under the code and Act.	7
Opposed tourist accommodation/eco pods in parks	14, 20, 48, 54, 65, 77, 100, 111, 129, 129, 146, 114, 153, 157	No	Government policy provides for the provision of accommodation in parks, including sensitive private development of accommodation. The provision of environmentally sensitive public and private development in parks allows for enhanced visitor experience and creates more opportunities for people to appreciate and enjoy parks.	7
Opposed additional campsites and tracks	156	No	The provision of additional tracks and campsites are carefully planned and considered. Additional campsites and tracks are an appropriate measure to disperse visitors and manage visitor load.	7
Suggested better defining accommodation types anticipated in designated Visitor Use Zones – e.g. 'RV sites', 'pods'	129	No	Visitor Use Zones in the plan already provide for the envisaged types of uses in those zones.	7

Suggested removing references to specific accommodation terminology (e.g. basic/moderate camping, glamping, eco-accommodation) and only describe broad scope and scale of what appropriate accommodation might constitute	136	No	The plan's purpose is to provide a strategic level of envisaged use in Visitor Use Zones, however, the Planning and Design Code requires Tourist Accommodation references to be specific in a park management plan.	7
Suggested providing more campgrounds in parks	28, 74	No	No change. Additional campsites in parks are incorporated where appropriate after careful planning and consideration.	7
Emphasised the need to rebuild campsites and cooking facilities on the KI Wilderness Trail as soon as possible	64	No	This level of detail is outside the scope of a strategic plan. The rebuilding of cooking facilities are planned at an operational level and are subject to funding and timelines.	6
Suggested including an objective to ensure accommodation and facilities to be unobtrusive and not visible on the headlands from the beaches.	105	No	The plan already addresses development to ensure park facilities and infrastructure are sustainably designed, constructed and operated, minimising impacts on the natural environment.	5
Expressed concern over private accommodation outside of the designated development zones	157	No	Already addressed in the plan – private development can only occur in designated Tourist Accommodation Visitor Use Zones.	5
Driving and roads				
Expressed the view that commercial 4WD is not an appropriate activity for protected areas and should not be expanded	8, 129, 140	No	Expressed a general view regarding commercial 4WD tours in parks that is not specific to this plan.	5
Expressed desire for more 4WD opportunities	21, 28, 74	No	Vehicle access throughout the parks is restricted to existing tracks, and no new public access tracks are proposed.	5
Suggested sealing the main access roads in Flinders Chase NP and Ravine des Casoars WPA e.g. West Bay Road, Shackle Road and the road to Cape Borda, in order to facilitate ease of visitor access	29	No	Outside the scope of this plan. Road infrastructure is managed at an operational level and in accordance with established asset management practices.	6
Suggested including a strategy to keep road infrastructure in good condition all year round	27	No	Outside the scope of this strategic plan. Road infrastructure is managed at an operational level and in accordance with established asset management practices.	6

Suggested providing more public vehicle access to more of the park	28, 29, 42, 48, 74, 80	No	Access throughout the parks is restricted to existing tracks, and no new public access tracks are currently proposed.	5
Suggested mentioning a code of conduct for recreational vehicles.	129	No	Outside the scope of a park management plan. The development of a code of conduct for recreational vehicles would require a state-wide policy focus.	6
Walking and cycling				
Suggested including lot 5 in the walking and cycling strategy connecting Grassdale and Kelly Hill to the Western Hub	4	No	Prescriptive details regarding content of the walking and cycling strategy is out of scope for this plan.	6
Opposed construction of additional walking and cycling trails	8, 77, 100, 107, 136, 119, 120, 140	No	The plan sets out the need for and intent to develop a detailed trails strategy.	5
Opposed cycling in parks	146, 151, 157		Noted. The plan sets out the need for and intent to develop a detailed trails strategy.	9
Supported construction of additional walking and cycling trails	112	No	The plan sets out the need for and intent to develop a detailed trails strategy.	5
Suggested allowing bike riding in all national parks	63	No	Outside the scope of this plan	6
Suggested providing more information about the 'Walking and cycling trails strategy' including a reference	129, 136	No	The plan sets out the need for and intent to develop a detailed trails strategy.	6
Suggested detailing how walking and cycling tracks will be managed to prevent them damaging the environment	129, 108	No	Requires prescriptive information outside the scope of strategic plan. The plan sets out the need for and intent to develop a detailed trails strategy.	6
Suggested construction of more minimal impact walking trails of a range of lengths with small, basic walker's camps	18, 29, 64, 67, 76	No	The plan sets out the need for and intent to develop a detailed trails strategy.	5
Suggested extending the Heysen trail	18	No	The plan sets out the need for and intent to develop a detailed trails strategy.	5
Suggested that a water tank is needed at Cape Gantheaume for walkers	18	No	The plan sets out the need for and intent to develop a detailed trails strategy.	5
Suggested constructing a trail link from the Wilderness Trail right through to Cape Borda	18	No	The plan sets out the need for and intent to develop a detailed trails strategy.	5

Suggested reinstating the Breakneck Creek walking track	129	No	The plan sets out the need for and intent to develop a detailed trails strategy.	5
Opposed any upgrading of the KI Wilderness Trail, or associated developments. Park management needs to consider the impact of the Wilderness Trail and visitors on these habitats.	136, 107	No	The plan sets out the need for and intent to develop a detailed trails strategy.	5
Expressed concern about the process to approve development by the private Australian Walking Company	8, 83, 111, 128, 129, 157	No	Noted. This plan defines that development can only occur within the defined Visitor Use Zones.	5
Other infrastructure				
Suggested installing eco-friendly toilets at popular tourist sites	55	No	The provision of facilities is addressed in the plan. Detailed planning and decision making on facility locations are made at an operational level and will fit within identified Visitor Use Zones	5
Opposed the broad nature of the statement 'operational infrastructure that supports the provision of exceptional visitor experiences will be located in Flinders Chase National Park and other locations as required' on page 16	136	No	Already addressed in the plan. Detail of locations and types is provided in the subsequent sentence and in the strategies section of that theme.	5
Supported a 'visitor hub' at the gateway to the western parks	119. 136	No	No change - supportive of plan	4
Suggested that the page 18 objectives and strategies first bullet point about the Flinders Chase Visitor Hub should remove the focus on Flinders Chase and the hub should instead be introducing visitors to all the assets of central and western Kangaroo Island	147	No	The language in the plan is considered appropriate. The focus of the visitor hub as detailed in the plan is to support visitor planning, research and education.	7
Commented that action to repair and expand tourism facilities is needed urgently to support the local tourism economy	5	No	Comment noted. Re-establishment and expansion of tourism facilities is underway and is subject to a number of external factors which impact on budgets and timeframes.	9
Suggested allowance of additional facilities at Grassdale for commercial tourism operators such as small viewing platforms and lock up facilities to store operational material	6	No	Outside the scope of this plan.	6
Suggested ensuring all camp sites are well facilitated with toilets and fire pits	48	No	Provision of facilities is already addressed in the plan. Detailed information of facility location	5

			decisions are made at an operational level and will fit within identified Visitor Use Zones.	
Suggested providing more background and explanation in the Theme 2 for 'providing visitor facilities along multi-day trails'	123	No	Addressed in strategies section of Theme 2.	5
Recommended that any proposals for visitor services such as trails and camping areas should be assessed on a case by case basis before being approved	9	No	The plan sets out the need for and intent to develop a detailed trails strategy.	5
Suggested including Lighthouse Keepers' graveyard and the Return Road Hike in p.18 Dot Point 13	129	No	Maps provided are strategic in nature and not meant to be highly prescriptive. Not all trails are shown on the maps included in the plan - major trails are shown for context.	8
Suggested implementing a comprehensive species monitoring program at least 12 months prior to any development work commencing	157	No	Monitoring is covered in the plan in Theme 1.	5
Staffing				
Emphasised the need to provide a real commitment to interpretation and educational ranger staff, or to detail how the goal of making visitor experiences immersive and enriching will be achieved	102, 111	No	Staffing and budgets are determined at an operational level.	6
Suggested including a strategy for employment conditions for park rangers	82	No	Staffing and budgets are determined at an operational level	6
Visitors and visitor management				
Questioned how the composition of visitors is changing and what the emerging issues relating to those changes are (Page 16, paragraph 4)	129	Yes	This paragraph has been updated for clarification. Detail regarding visitor markets is beyond the scope of this document	3
Expressed a desire for more opportunities for the local communities near these parks – not a bias towards visitors	27, 66	No	Visitors is intended to mean both local and from afar. This language has been clarified in the plan.	5
Suggested standardising and using 'visitor' rather than 'tourist' – parks are important for locals as well as offisland tourists	129	Yes	Language has been updated in the plan where appropriate	2

Suggested including an analysis of current (and flature) use and user characteristics to assess the equitable and just distribution across use and users. Suggested including a strategy for compliance requirements and policing a strategy for compliance fractional level. Poposed inclusion of 'Reducing the impact on the parks caused by visitors'—claimed visitors make park safer e.g. through more access racks Suggested referencing the Visitor Use Management framework: https://visitorsanagement.ps.gov Suggested referencing the Visitor Use Management framework: https://visitorsanagement.ps.gov Suggested setting limits on the number of people at any one site, at any one time, and stopping access to site for periods of time for site regeneration Opposed the plan's promotion of dispersal of visitors 8, 100, 108 No This was a clear direction from the community from consultation during the Reinagine R1 enables and popular sites. Suggested that a detailed visitor management strategy and traffic management strategy should be required for each protected area Suggested that a detailed visitor management strategy and traffic management strategy should be required for each protected area Supported the plan's visitor management strategy Expressed the view that too much detail is provided for visitor services objectives and strategies. Suggested deleting libe four duty lositor park facilities to exceed the view that too much detail is provided for visitor services objectives and strategies on page 18 and replacing with a single strategy. "Develop Park facilities to create exceptional visitor excess objectives and strategies under the objective on page 19. Recommended removing the reference to restricting visitors with colories are careed exceptional visitor experiences." Suggested deleting the four duty point strategies under the objective on page 19. Recommended removing the reference to restricting visitors with colories and strategies on page 18.					
requirements and policing Opposed inclusion of 'Reducing the impact on the parks caused by visitors' - claimed visitors make park safer e.g. through more access tracks Suggested referencing the Visitor Use Management framework: https://visitorusemanagement.pps.gov No The resource referenced in this comment is an American interagency framework, the content of which is not relevant to this management plan. Suggested setting limits on the number of people at any one site, at any one time, and stopping access to site for periods of time for site regeneration Opposed the plan's promotion of dispersal of visitors 8, 100, 108 No Wisitor management is addressed in Theme 3 and seasonal/short term closure of areas covered in Theme 1 of the plan, with detail developed at an operational level. Opposed the plan's promotion of dispersal of visitors 8, 100, 108 No This was a clear direction from the community from consultation during the Reimagine KI engagement process and is best practice to manage visitor access for popular sites. Suggested that a detailed visitor management strategy and traffic management strategy should be required for each protected area Supported the plan's visitor management strategy Supported the plan's visitor management strategy Expressed the view that too much detail is provided for visitor services objectives and strategies. Suggested deleting and objectives and strategies on gage 18 and replacing with a single strategy. "Develop Park facilities to create exceptional visitor experiences". Suggested deleting the four dot point strategies under the objective on page 19. Recommended removing the reference to restricting 116, 129 No This statement also refers to Ravine de Casoars	use and user characteristics to assess the equitable and	137	No	Visitor profiling to meet user needs is informed at	6
parks caused by visitors" – claimed visitors make park safer e.g. through more access tracks Suggested referencing the Visitor Use Management framework: https://visitorusemanagement ips.gov Suggested setting limits on the number of people at any one site, at any one time, and stopping access to site for periods of time for site regeneration Opposed the plan's promotion of dispersal of visitors Suggested that a detailed visitor management strategy and traffic management strategy should be required for each protected area Suggested that a detailed visitor management strategy should be required for each protected area Expressed the view that too much detail is provided for visitor services objectives and strategies. Suggested deleting all objectives and strategies on page 18 and replacing with a single strategy—"Develop Park facilities to create exceptional visitor express." Suggested deleting the four dot point strategies under the objective on page 19. Suggested the reference in this comment is an American interagency framework, the content of which is not relevant to this management is and seasonal/short term closure of areas covered in Theme 1 of the plan, with detail developed at an operational level. No This was a clear direction from the community from consultation during the Reimagine KI engagement process and is best practice to manage visitor access for popular sites. Suggested that a detailed visitor management strategy should be required for each protected area 8, 11, 129, 139 Theme 3 of the plan provides a high level 'visitor management' direction with a focus on exceptional experiences, visitor dispersal, connecting visitors with nature and heritage. Further detail regarding Visitor management is an operational function. Supported the plan's visitor management strategy and traffic management is an operational function. Page 10, 10, 10, 10, 10, 10, 10, 10, 10, 10,		129	No	framework, policies and procedures are not	6
framework: https://visitorusemanagement.nps.gov American interagency framework, the content of which is not relevant to this management plan. Suggested setting limits on the number of people at any one site, at any one time, and stopping access to site for periods of time for site regeneration Opposed the plan's promotion of dispersal of visitors Suggested the plan's promotion of dispersal of visitors Suggested that a detailed visitor management strategy and traffic management strategy should be required for each protected area Supported the plan's visitor management strategy Supported the plan's visitor management strategy Expressed the view that too much detail is provided for visitor services objectives and strategies on page 18 and replacing with a single strategy "Develop Park facilities to create exceptional visitor experiences". Suggested deleting the four dot point strategies under the objective on page 19. Recommended removing the reference to restricting American interagency framework, the content of which is not relevant to this management plan to which is not relevant to this management plan and seasonal/short term closure of a reas covered in Theme 3 and seasonal/short term closure of areas covered in Theme 1 of the plan porition of areas covered in Theme 1 of the plan, with detail developed at an operational level. Supported the plan 's promotion of dispersal of visitors and is best practice to manage wisitor access for popular sites. Supported the plan provides a high level 'visitor management direction with a focus on exceptional experiences, visitor dispersal, connecting visitors with nature and heritage. Further detail regarding Visitor management is an operational function. No No change - supportive of plan 4 The level of information provided in the plan is appropriate to direct strategic use and development within parks Recommended removing the reference to restricting 116, 129 No This statement also refers to Ravine de Casoa	parks caused by visitors' – claimed visitors make park	80	No		7
one site, at any one time, and stopping access to site for periods of time for site regeneration Opposed the plan's promotion of dispersal of visitors 8, 100, 108 No This was a clear direction from the community from consultation during the Reimagine KI engagement process and is best practice to manage visitor access for popular sites. Suggested that a detailed visitor management strategy and traffic management strategy should be required for each protected area 8, 11, 129, 139 Theme 3 of the plan provides a high level 'visitor management' direction with a focus on exceptional experiences, visitor dispersal, connecting visitors with nature and heritage. Further detail regarding Visitor management is an operational function. Supported the plan's visitor management strategy 12 No No change - supportive of plan Expressed the view that too much detail is provided for visitor services objectives and strategies. Suggested deleting all objectives and strategies on page 18 and replacing with a single strategy - "Develop Park facilities to create exceptional visitor experiences". Suggested deleting the four dot point strategies under the objective on page 19. Recommended removing the reference to restricting 116, 129 No This statement also refers to Ravine de Casoars		137	No	American interagency framework, the content of	6
from consultation during the Reimagine KI engagement process and is best practice to manage visitor access for popular sites. Suggested that a detailed visitor management strategy and traffic management strategy should be required for each protected area 8, 11, 129, 139 Theme 3 of the plan provides a high level 'visitor management' direction with a focus on exceptional experiences, visitor dispersal, connecting visitors with nature and heritage. Further detail regarding Visitor management is an operational function. Supported the plan's visitor management strategy 12 No No change - supportive of plan 4 Expressed the view that too much detail is provided for visitor services objectives and strategies. Suggested deleting all objectives and strategies on page 18 and replacing with a single strategy — "Develop Park facilities to create exceptional visitor experiences". Suggested deleting the four dot point strategies under the objective on page 19. Recommended removing the reference to restricting from consultation during the Reimagine KI engagement process and is best practice to manage with a high level 'visitor and is best practice to management visitor and is best practice to manage with a focus on exceptional december of management direction with a focus on exceptional experiences, visitor dispersal, connecting visitors with nature and heritage. Further detail regarding Visitor management is an operational function. 9 No The level of information provided in the plan is appropriate to direct strategic use and development within parks	one site, at any one time, and stopping access to site for	73	No	seasonal/short term closure of areas covered in Theme 1 of the plan, with detail developed at an	5
and traffic management strategy should be required for each protected area management direction with a focus on exceptional experiences, visitor dispersal, connecting visitors with nature and heritage. Further detail regarding Visitor management is an operational function. Supported the plan's visitor management strategy 12 No No change - supportive of plan 4 Expressed the view that too much detail is provided for visitor services objectives and strategies. Suggested deleting all objectives and strategies on page 18 and replacing with a single strategy - "Develop Park facilities to create exceptional visitor experiences". Suggested deleting the four dot point strategies under the objective on page 19. Recommended removing the reference to restricting 116, 129 No This statement also refers to Ravine de Casoars 8	Opposed the plan's promotion of dispersal of visitors	8, 100, 108	No	from consultation during the Reimagine KI engagement process and is best practice to manage	
Expressed the view that too much detail is provided for visitor services objectives and strategies. Suggested deleting all objectives and strategies on page 18 and replacing with a single strategy – "Develop Park facilities to create exceptional visitor experiences". Suggested deleting the four dot point strategies under the objective on page 19. Recommended removing the reference to restricting No The level of information provided in the plan is appropriate to direct strategic use and development within parks 7 Suggested deleting the four dot point strategies under the objective on page 19. No This statement also refers to Ravine de Casoars	and traffic management strategy should be required for	8, 11, 129, 139		management' direction with a focus on exceptional experiences, visitor dispersal, connecting visitors with nature and heritage. Further detail regarding	6
visitor services objectives and strategies. Suggested deleting all objectives and strategies on page 18 and replacing with a single strategy – "Develop Park facilities to create exceptional visitor experiences". Suggested deleting the four dot point strategies under the objective on page 19. Recommended removing the reference to restricting 116, 129 No This statement also refers to Ravine de Casoars 8	Supported the plan's visitor management strategy	12	No	No change - supportive of plan	4
	visitor services objectives and strategies. Suggested deleting all objectives and strategies on page 18 and replacing with a single strategy – "Develop Park facilities to create exceptional visitor experiences". Suggested deleting the four dot point strategies under	9	No	appropriate to direct strategic use and development	7
		116, 129	No		8

Cape Bouguer WPA as there is currently no vehicle access to this area				
Suggested providing detailed information on impacts from developments/visitors to be monitored, the range of acceptable change and exactly what actions will be triggered	153	No	Monitoring is addressed in Theme 1. The level of detail suggested in this comment is out of scope for this type of strategic plan.	5, 6
Expressed concerned about visitor impacts on the sea lion colony in Seal Bay Conservation Park	153	No	Already addressed in the plan	5
Wilderness Protection Areas (WPAs)				
Suggested better signage, regulation and enforcement of rules (e.g. vehicles and dogs) in WPAs	4	No	No change. These comments are operational in nature.	6
Expressed concern regarding over-visitation of WPAs	4	No	Theme 2 sets out a strategy to assess the impact of visitors on wilderness values. Management response will be informed by this.	5
Oppose any visitor/tourism development in WPAs	157	No	The plan addresses this through a visitor management strategy for development in WPAs	5
Other				
Highlighted that there is a misalignment between the visitor facility maps in the plan and those within the DEW Visitor Experience Strategy – recommended better aligning these	112	No	No change required. There are no specific maps in the visitor experience strategy.	8
Questioned how extracting water from dams in Lathami Conservation Park creates exceptional visitor experiences in the parks	123, 129	No	No change required. Water extraction is for KI Community and to supply water to Public toilet facilities at Stokes Bay.	3
Opposed "Providing scope for commercial tourism businesses to develop new nature-based tourism ventures that enhance and support the natural characteristics of the parks" statement in challenges and opportunities	8, 120, 129, 119, 108, 157	No	The provision of environmentally sensitive public and private development in parks allows for enhanced visitor experience and creates more opportunities for people to appreciate and enjoy parks.	7
Suggested including a strategy for managing leases, licences and shacks in Theme 3	116	No	No change. This level of detail is not appropriate for a strategic plan. Licences and leases are managed at an operational level across the state.	6

Recommended individual development proposals should be subject to a rigorous EIA process (c.f. SA Water, DIT) and allowing public input	120	No	All development proposals are subject to existing planning laws and regulations.	6
Recommended providing a description of how partnerships with private businesses will be developed, monitored, and maintained	88, 124	No	This information is not provided at a strategic level and is beyond the scope of this plan. Theme 3 includes a strategy to ensure all tourism activities are delivered in a responsible and sustainable way,	6
Recommended ensuring commercial tourism is affordable and require financial return to the park	116, 129, 136	No	Out of scope for a strategic plan of this type. Theme 2 includes a strategy that notes a Conservation Dividend may be required in addition to a licence or lease.	6
Opposed allowing 'on-water activities' strategy page 18	8	No	No change. This strategy is considered appropriate.	7
anagement plan structure and writing				
Opposed having just one management plan for 15 parks – suggest an individual plan with specific strategies and much more information for each park. 'No justification is presented for making one plan'	7, 8, 10, 11, 89, 95, 96, 107, 100, 102, 111, 116, 129, 128, 106, 108, 109, 114, 123, 127, 138, 140, 148, 151, 153, 156, 157	No	The contiguity and extent of this suite of parks on Kangaroo Island, coupled with the impacts of the 2019-20 bushfires, meant that planning for these parks could be undertaken holistically. This approach ensured transparency in the planning process and enabled the community to have oversight on proposed management decisions at a landscape scale. The plan reflects the unique values, challenges, management issues and threats of each park at the appropriate level for a strategic document. Importantly, this management plan will set a consistent, high-level framework to guide more detailed operational plans.	7
Expressed concern about the lack of references. Suggested increasing the number of references, in particular scientific/peer reviewed references to make the plan more science based.	8, 9, 11, 95, 96, 109, 115, 118, 123, 124, 129, 131, 140, 141, 142, 150, 151, 152, 154, 157	No	Park management plans are high-level, strategic policy documents. They are informed by the best available scientific information. They are not designed to reference the full extent of all resources in the format of an academic research paper. A bibliography of some of the key resource material is provided in the plan – this is not intended to be an exhaustive reference list.	7

Suggested referencing the NRM plan 2017 – 2027	157	Yes	Alignment with priorities identified in the regional Landscape Plan 2021-2026 has been added in this plan	3
Expressed concern that strategies and objectives are too vague and need considerably more detail	7, 8, 10, 11, 18, 89, 96, 107, 100, 102, 103, 111, 116, 129, 141, 109, 114, 123, 124, 131, 132, 133, 134, 138, 139, 140, 148, 150, 151, 152, 153, 154, 157	No	The plan is not designed to provide detailed actions as it is a strategic document.	6
Suggested making the plan's wording firmer to provide additional protection: e.g. remove "minimise impacts on the environment", "where possible" etc. and change to e.g. "do not impact the environment" etc.	100, 108	No	The plan acknowledges the challenge in balancing natural values and visitor opportunities. The development of visitor facilities seeks to minimise impacts. Through the identification of visitor use zones, areas for development are defined and constrained.	5
Recommended clearly defining all terms e.g. "minimising impacts", "maximising sustainability", "sustainable design", "where possible"	100, 129, 141	No	Park management plans are strategic in nature. Providing detailed definitions of terms is out of scope.	6
Suggested ensuring the success of the strategies is measured	58, 102	No	Strategies are aimed at a strategic level, success of any actions undertaken are monitored at an operational level.	6
Called for a commitment as to when the plan will be reviewed	102, 111, 129, 109, 147, 157	No	Park management plans do not have a mandated review period.	7
Expressed concern that some objectives have conflicting clauses with no clear indication of preference. E.g. objective 2 maintaining wilderness qualities of Cape Torrens etc. and providing visitor opportunities, and objective 6	96, 123	No	Already addressed in the plan through the visitor management strategy	5
Suggested reconsidering the order of the parks listed in the plan	127	No	Parks are in alphabetical order for consistency and simplicity.	7
Suggested dividing the parks covered in this plan into three plans – Western, Central and Eastern. Or split into two separate plans, one covering Parks and WPAs that had been burned / directly impacted by the catastrophic 2019-20 fires); and the other covering the Parks and WPAs that were not burned in the 2019-20 fires.	107	No	The contiguity and extent of this suite of parks on Kangaroo Island mean that they face similar challenges and threats, including the impacts of past fires and the threat of future fires. Management planning on the basis of recent fire history alone becomes irrelevant over time due to the dynamic nature of fire history, however the re-imagining KI	7

			process presented a unique opportunity to plan for these parks holistically. This approach ensured transparency in the planning process and enabled the community to have oversight on proposed management decisions at a landscape scale. The plan reflects the unique values, challenges, management issues and threats of each park at the appropriate level for a strategic document. Importantly, this management plan will set a consistent, high-level framework to guide more detailed operational plans.	
Suggested writing four management plans for: 1. Flinders Chase National Park, Kelly Hill Conservation Park, the Ravine de Casoars Wilderness Protection Area, and the Cape Bouguer Wilderness Protection Area. 2. Seal Bay Conservation Park with Cape Gantheaume Conservation Park and the Cape Gantheaume Wilderness Protection Area. 3. Western River and Cape Torrens Wilderness Protection Areas; and 4. All remaining conservation parks	148, 157	No	The contiguity and extent of this suite of parks on Kangaroo Island, coupled with the impacts of the 2019-20 bushfires, meant that planning for these parks could be undertaken holistically. This approach ensured transparency in the planning process and enabled the community to have oversight on proposed management decisions at a landscape scale. The plan reflects the unique values, challenges, management issues and threats of each park at the appropriate level for a strategic document. Importantly, this management plan will set a consistent, high-level framework to guide more detailed operational plans.	7
Suggested changes to mapping or increased in detail of maps provided	116, 129, 147	Yes	Additional content was added to maps in the plan where appropriate.	3
Minor editorial suggestions'	1, 3, 8, 107, 108, 111, 116, 119, 129, 136, 145, 146, 148, 157, 158	Yes	Additional content was added to maps in the plan where appropriate.	3
Suggested the Flinders Chase complex of reserves should be included in one plan and Seal Bay (given the management complexity of Seal Bay) must also have a specific plan	151	No	The contiguity and extent of this suite of parks on Kangaroo Island, coupled with the impacts of the 2019-20 bushfires, meant that planning for these parks could be undertaken holistically. This approach ensured transparency in the planning	7

			process and enabled the community to have oversight on proposed management decisions at a landscape scale. The plan reflects the unique values, challenges, management issues and threats of each park at the appropriate level for a strategic document. Importantly, this management plan will set a consistent, high-level framework to guide more detailed operational plans.	
ultural heritage and history				
Supported the objectives and strategies in Theme 6 celebrating cultural heritage and history	112	No	No change – supportive of plan	4
Recommended mentioning the Ramindjeri People in addition to Kaurna, Ngarrindjeri and Narungga People	116, 151, 157	No	Engagement during the plan's development identified the three mentioned People.	8
Suggested mentioning the Aboriginal women brought to the island in Theme 6	123, 129	No	Connection to the Island is covered in Theme 6.	5
Suggested recognising the cultural heritage of other places outside of Flinders Chase e.g. Cape Borda, Ravine des Casoars WPA, Kelly Hill Caves Conservation Park, Cape Gantheaume Conservation Park etc. in Theme 6	123, 129	No	Details of heritage places are provided in text of Theme 6 and broadly in the strategies	5
Suggested mentioning the Return Road Hike, which recreates the road taken by lighthouse keepers, or the lighthouse keepers' cemetery. Suitable interpretative signage should be installed.	129	No	Detailed provided is considered appropriate	7
Expressed the view in the first paragraph of Theme 6, it is disrespectful to include European built heritage in the same sentence as First Nations. Recommended removing this reference to European heritage and relocating to paragraph 6 or below	116, 129	No	This sentence is speaking generally regarding the evidence of people living on the island and is considered appropriate. The next paragraph speaks exclusively to Aboriginal heritage.	7
Suggested reconsidering whether the inclusion of First Nations groups in strategies and objectives in Theme 6 is appropriate due to the Aboriginal connection to KI being mythological and not physical	129, 151, 157	No	There is physical evidence of historical Aboriginal presence on Kangaroo Island.	8
Identified that Flinders did not circumnavigate the South Australian coastline since it would imply that	8, 129	Yes	This language has been changed.	3

South Australia is an island (p.24). Suggested changing this word to transverse				
Community				
Expressed concern over the current consultation processes – suggested conducting more meaningful public and scientific consultation, and genuinely taking into account responses	8, 94, 111, 129, 128, 146, 115, 118, 123, 127, 151, 157	No	Out of scope of plan. Consultation was undertaken consistent with park planning requirements.	6
Suggested changing the wording of "draft plan was developed with input from technical specialists, community leaders and interested members of the public" – community group consultation was not extensive and was for invited stakeholders only	127, 151, 157	No	The development of the plan utilised the "reimagine KI" engagement process and information received from that engagement process, as well as conducting a forum with key stakeholders. The plan was then released for three months public consultation.	7
Expressed the view that the strategy for collaboration with researchers and the community within Theme 1 is insufficient and should be expanded	8, 129	No	Language is considered appropriate for a strategic document such as this.	6
Suggested including an objective for volunteers and local community connection	101, 123, 127	No	Already addressed in the strategies for Theme 1.	5
Recommended educating private landowners in responsible environment stewardship	11	No	Out of scope for this plan. The plan includes a strategy in Theme 1 to work with adjoining land managers to limit the impact of neighbouring land uses on wilderness values, wildlife and ecosystems. Theme 4 also refers to partnering with neighbours to reduce bushfire risk.	6
Emphasised the importance of listening to local, park staff and farmer knowledge, and collaborating together	19, 33, 58, 82, 130,	No	Collaboration is addressed in strategies for Themes 1 and 6.	5
Emphasised the importance of listening to First Nations residents	59	No	This is already addressed in Theme 6.	5
Apiary				

Opposed apiary licencing in protected areas	8, 10, 12, 82, 89, 96, 101, 102, 111, 116, 129, 136, 119, 128, 141, 106, 108, 109, 114, 117, 120, 123, 127, 134, 140, 151, 156, 157	No	The department has an Apiary Policy, the plan refers to that policy.	7
Supported apiary licencing in parks	121, 125	No	The department has an Apiary Policy, the plan refers to that policy.	4
Suggested removing the apiary licencing content from Theme 1 and moving it to a new section for permits, leases and licencing. Recognise the importance of the industry but provide further restrictions e.g. licenses will be suspended within fire impacted areas within the protected areas estate, and future licenses will not be considered within the protected area estate.	148	No	Information regarding licences and operations of apiary in parks is guided by the departmental apiary policy. No change to section discussing apiary.	7
Suggested referring to the historical values of the Ligurian Bee, and recognise that KI contains the 'last pure strain of Ligurian bee' and hence the continued inclusion of bee sites in the park needs to be supported	121	No	Out of scope for this plan	6
Suggested referring to biosecurity protocols relating to KI that should continue due to the low incidence of some honeybee diseases and the threat posed by Varroa mite	121	No	Out of scope for this plan – refer to PIRSA biosecurity policy for Kangaroo Island and DEW Apiary policy.	6
Opposed the plan stating that commercially managed honeybees have a detrimental effect on park flora and fauna	121, 125	No	Plan does not state this.	8
Opposed apiary sites not being permitted in WPAs and other historical locations	121, 125	No	WPA access is guided by the South Australian Code of Management for Wilderness Protection Areas and Zones which restricts the establishment of non-indigenous species.	7
Suggested recognising the importance of honey and bee related products to KI's economy in the plan	121	No	Out of scope for this plan	6
Suggested including the bee farm opposite the burnt out remains of the Flinders Chase Information Centre as a historical site	121	No	The site referenced is an old government apiary site and not needed as reference to a historical site. This area is not accessible to the public with very little remnant of past activities.	7

Suggested recognising the net loss of honeybee sites and promote the reversal of such site reductions irrespective of the fire devastation of 2019.	121	No	The department has an Apiary Policy, the plan refers to that policy.	7
Planning and policy				
Expressed the view that existing management plans have been ignored in the creation of this draft plan	8, 11, 100, 135	Yes	Existing management plans were reviewed and utilised to provide information to the current plan. Language has been added to 'Developing this plan' section to clarify this.	3
Expressed the view that the plan does not align with the objectives of management under the National Parks and Wildlife Act SA (1972) or the Wilderness Protection Act (1992)	116, 129, 148, 157	No	The plan is has been prepared in alignment with the objectives of management under the <i>National Parks</i> and Wildlife Act SA (1972) or the Wilderness Protection Act (1992)	7
Expressed concern that the plan does not reference the current management plan for Conservation Parks of Kangaroo Island; Beatrice Islet, Busby Islet, Cape Hart, Cape Torrens, Dudley, Mount Taylor, Nepean Bay, Parndana, Pelican Lagoon, Seddon, Vivonne Bay and Western River Conservation Parks (1988). Questioned what the status of this old plan is now some of them are covered under this new document	116, 129	No	DEW plans do not need to be referenced in DEW documents. Most of these plans mentioned are in the eastern section so not part of this plan. All existing plans that are being replaced are identified in the new plan. Once new plan is adopted, old plans are not applicable.	8
Expressed concern that the plan does not align with the findings of the Reimagine report. Recommended more directly using the findings of 'Reimagine' report in this document, and referencing to the Reimage report in the plan	129, 128, 151, 157	Yes	The Reimagine report findings were closely utilised in the development of this plan. Language has been added to the plan to confirm this.	3
Suggested including objectives in existing plans in this draft plan	108, 151	No	The new plan is a strategic document with a new scope.	7.
Suggested including an evaluation of the current (adopted) management plans and their achievements or failures	157	No	Out of scope for engagement on this draft plan. This was undertaken as part of developing the draft plan.	6
Other				
Expressed concern over quarrying at Lot 5 in Flinders Chase National Park near the Kangaroo Island Wilderness Trail – suggested this land could be better used and protected	4	No	Not within scope of this management plan. The quarry site referenced is located within grazing land of old farm now part of the park and the area is not	6

			accessible to visitors. Limestone is only quarried for use within the park.	
Expressed concern about the lack of a framework for financial directions	8, 11, 12, 91, 101, 107, 116, 129, 136, 119, 117, 120, 142	No	Out of scope for a strategic document of this type.	6
Expressed concern about a lack of timeframes provided for implementation of actions	157	No	Out of scope for a strategic document of this type.	6
Expressed concern about plans to build a new port to move timber	55	No	Out of scope for this plan.	6

See below for further information on the survey results

Survey Questions

There were 93 survey responses (note the YourSAy summary report suggests there were 95 responses, but two of these were registered during testing the survey and are shown in the total figure).

<u>QUESTION 3</u> - The draft plan identifies six themes of importance to protect and manage the parks. Question 3 asked survey respondents to rate these themes on a scale of 1 to 5, with 1 being least important and 5 being most important.

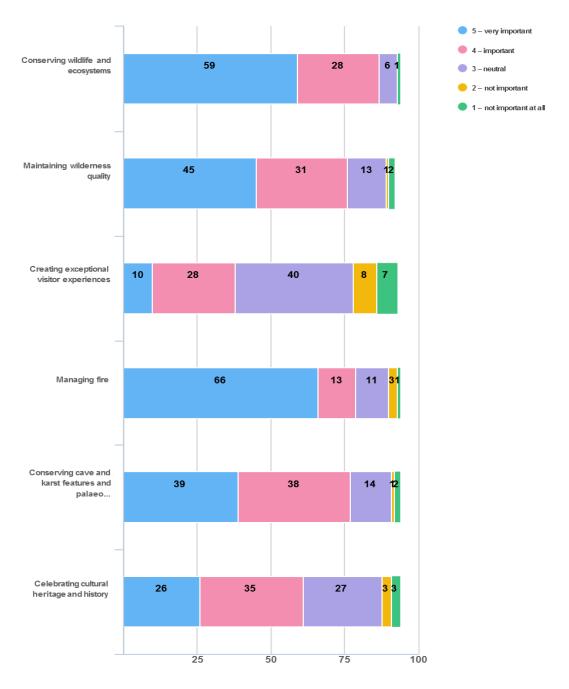


Figure 1 - Question 3 responses

Figure 1 indicates that Conserving wildlife and ecosystems is considered to the most important theme, with 92% of survey respondents ranking it very important or important. Other important themes that gained high scores for very important or important were Managing fire (84%), maintaining wilderness quality (81%), and conserving cave and karst features and paleontological sites (82%). Creating exceptional visitor experiences received 41% for very important/important, but notably had quite a high neutral response of (43%), with only 16% of respondents ranking this as not important or not important at all.

Response: This indicates that survey respondents were very supportive of the conservation themes in the plan, and also very supportive to the fire theme in the plan. The plan works to balance the needs of these themes and the survey responses suggest that the plan has covered both of these requirements. As a result, no changes have been made to the document based on these even survey result, with the changes made stemming from Table 2 and written submissions.

<u>QUESTION 4 -</u> Each theme also sets out objectives for the draft plan. Question 4 asked survey respondents to rate these objectives on a scale of 1 to 5, with 1 being strongly don't support and 5 being strongly support.

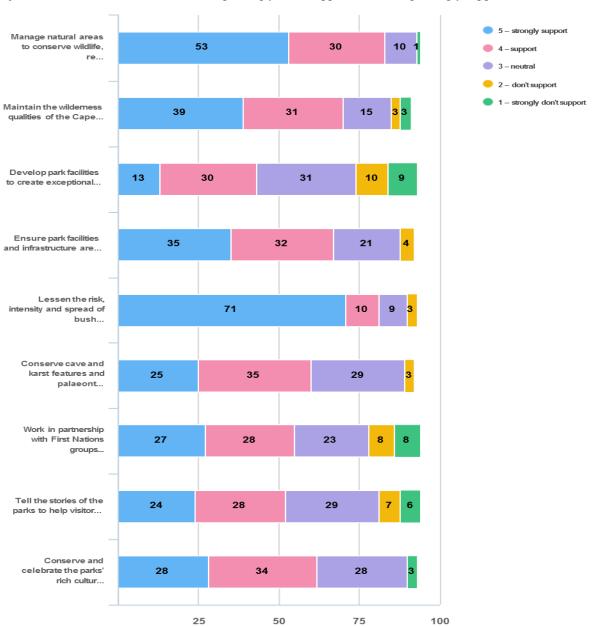


Figure 2 - Question 4 responses

Question 4 demonstrates similar results to Question 3. Figure 2 indicates that the objective to manage natural areas to conserve wildlife, recover priority species, and maintain ecosystem health is heavily supported with 89% of respondents strongly supporting or supporting this. Lessen the risk, intensity and spread of bushfires through fire management activities to make suppression more achievable and safer, and to maintain or improve biodiversity objective was also strongly supported with 87% of respondents strongly supporting or supporting this. The graph shows that all the objectives in the plan scored well in the surveys, indicating the objectives in the plan are supported by the community.

Response to this feedback - no change to plan based on these supporting survey results, with the changes made stemming from Table 2 and written submissions.