

# Analysis of Public Submissions

## Witjira National Park Draft Management Plan



Ref: DEW [Insert File Ref No]

The Witjira National Park Draft Management Plan was released for public consultation from 28 February 2017 to 9 June 2017. 10 submissions on the draft management plan were received. These are summarised in Table 1.

Table 1 – Summary of submissions

Submission Number	Name	
1	Anna Russo	Aboriginal Affairs and Reconciliation
2	Don Ransom	Individual
3	David Lake	South Australian Tourism Commission
4	Irrwanyere Aboriginal Corporation	NGO
5	Nicki de Preu	Nature Conservation Society of SA
6	Nigel Long	SA chamber of Mines and Energy
7	John Barker	Mineral Resources Group, DPC
8	Brian Baillie	Individual
9	Magnus Eriksson	Outback Adventure Treks
10	Kaz Herbst	SSAA - CWM

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

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

1. Feedback provided additional information of direct relevance to 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.

Table 2 – Summary of feedback

Comment No.	Comment	Sub No	Plan Altered	Proposed Response	Criteria
1	Offered minor editorial suggestions and references.	1, 5, 6, 7	Yes	The plan has been revised to reflect these comments as appropriate.	3
2	Commented that the plan is well presented, well written and succinct, with a high level of cultural understanding and engagement.	1	No	No change required – supportive of plan.	4
3	Suggested the inclusion of Aboriginal employment opportunities as well as promotion of cultural tourism and other business opportunities.	1, 4	Yes	Employment opportunities are already addressed in the plan. However, an additional strategy around supporting traditional owners to develop tourism enterprises has been included on page 18.	3
4	Suggested that the power of the Co-management Board to close off parts of the park for traditional purposes could be adopted across all SA co-managed parks	1	No	Outside the scope of this plan. Co-management arrangements across South Australia are negotiated individually and are set out in the relevant co-management agreement.	6
5	Suggested that more detail is included on how the board will manage relationships with mineral and petroleum activities in the context of managing heritage values	1	Yes	An additional information box on mineral and petroleum activities has been included on page 14 to provide clarity on the need for early engagement with traditional owners. The sixth strategy has also been altered on page 15 to clarify that a collaborative approach to planning will protect the heritage values of the park.	2
6	Suggested inclusion of a general engagement strategy and set of procedures for when heritage sites are discovered, possibly as an appendix.	1	No	There are procedures in place for the appropriate recording of heritage sites. Including these procedures in the plan is not necessary for a strategic document of this type.	6
7	Suggested that generator use be from 9.00am to 5.00 pm.	2	No	After careful consideration, the standard that has been adopted by recent plans is for generators to be restricted to daylight hours.	7
8	Suggested that the use of foam floaters could be encouraged in Dalhousie Springs to minimise disturbance to sediment.	2	No	Detail on the importance of minimising disturbance is already included in the plan. Information for visitors on minimum impact behaviours is best provided through visitor information at the site.	9
9	Commented that the signage about and on the walks should be increased from the present level.	2	No	No change. Scope is provided in the plan to improve signage.	5
10	Commented that a dump point for portable toilet cassettes should be built at Dalhousie.	2	No	Due to the possible environmental impacts, and the costs of associated with constructing and maintaining waste disposal infrastructure, it is considered more desirable that this continues to occur at appropriate sites outside of the park.	7

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11	Commented that the draft plan acknowledges the opportunity for the establishment of new nature-based tourism ventures and includes a strong theme about providing a unique cultural and nature-based experience for visitors.	3	No	No change required – supportive of plan.	4
12	Provided comments and suggestions on the Wangkangurru and Lower Southern Arrernte cultural aspects of the plan.	4	Yes	The language throughout the plan has been reviewed by the Board to better reflect the relationship between the traditional owners and their Country. Additional images have been included and quotes have been provided as appropriate.	2
13	Suggested that protection of sites should make reference to compliance with the Witjira National Park Indigenous Land Use Agreement (ILUA) by the State Government.	4	Yes	The obligations under the Witjira National Park ILUA have been referenced on page 14 of the plan.	3
14	Expressed concerns with the use of the main pool at Dalhousie and the behaviour of some visitors. Requested that further consideration is given to including monitoring of visitor behaviour and encouraging respectful practices.	4	Yes	The plan has been altered to highlight that the pool is culturally and environmentally significant. Respectful visitor use is encouraged and strategies have been included around monitoring visitor impacts.	2
15	Corrected the accuracy of a number of statements under theme 1 with regards to Wangkangurru and Lower Southern Arrernte people.	4	Yes	Theme 1 (pages 11 & 12) has been altered to reflect these comments.	3
16	Initiatives to ensure that the park is cattle free should be a specific strategy included in the Management Plan.	4	Yes	Continuing efforts to ensure that cattle do not access the park, and in particular key ecological and cultural sites, has been included in a strategy on page 15.	3
17	Requested that the plan specify the legal framework through which Wangkangurru and Lower Southern Arrernte people are engaged with regards to potential exploration and mining activities on the park.	4	Yes	The Acts, ILUA's and agreements under which mineral and petroleum exploration and production companies are required to engage with traditional owners have been listed in the plan on page 14.	3
18	Recommended that the plan include a statement to clarify the intended purpose of the plan is not to provide strategies to address all issues confronting the park or specify all strategies that will be undertaken but provide an overview of management arrangements and outline key priorities for long term management.	5	Yes	This statement has been included in the plan on page 2.	2

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19	Recommended that 'park significance and purpose' acknowledge that many of the rare and threatened plants and animals that occur within Witjira are of national environmental significance including migratory shorebirds that are protected under international agreements.	5	Yes	Migratory shorebirds have been included into this section. Further detail is also provided in Theme 2.	1
20	Recommended that the threatened ecological community of "Native species dependent on natural discharge of groundwater from the Great Artesian Basin" that occurs within the Dalhousie Mound Springs Complex is added to the list of environmental assets protected within Witjira NP.	5	Yes	This information has been included into 'What are we protecting'.	1
21	Recommend that the management of threatened species and ecological communities to ensure their long-term conservation should be added as a challenge, particularly in response to climate change. Recommended that utilising Recovery Plans should be included as a priority.	5	Yes	This information has been incorporated into the plan in the 'challenges and opportunities' section.	1
22	Recommend that this section acknowledge the impacts of coal seam and unconventional gas developments on groundwater.	5	No	The effects of mineral and petroleum exploration and production activities on groundwater have been sufficiently outlined in the plan.	5
23	Recommended that Theme 2 refer to priorities identified in Volume 6 of the South Australian Arid Land Biodiversity Strategy (DEH, 2009).	5	No	This plan seeks to provide an overview of management arrangements and outline key priorities for long term management. Alignment with priorities identified in regional plans has been included in this plan.	6
24	Recommended that key management issues around waterholes, camping areas and vehicles are acknowledged in the plan. Recommended a more strategic approach for managing increased visitor numbers.	5	Yes	Theme 3 has been re-written to more clearly detail how visitor use and impacts will be monitored and managed.	3
25	Recommended change to ordering of strategies given the cultural importance of the area to the Wangkangurru and Lower Southern Arrernte people.	5	No	Strategies are not listed in order of importance. The cultural importance of the area to Wangkangurru and Lower Southern Arrernte culture is detailed throughout the plan.	7
26	Recommend the plan identify the need for development of a waste management plan.	5	No	It is not necessary to list all subordinate plans that may be developed in a strategic document of this type.	6

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27	Recommended that the table in Appendix 2 include migratory bird species that are known to occur on the Reserve	5	Yes	Appendix 2 details species of State and National conservation significance that have been officially recorded in the park. However, the presence of migratory birds in the park has been acknowledged in 'park significance and purpose'.	3
28	Queried the legality of a management plan imposing controls on mining activity in the Dalhousie Springs area given the joint proclamation of the park.	6, 7	Yes	The statement that resource exploration is prohibited from within the national heritage area has been removed. Additional detail has been included in the plan to clarify the legislation which regulates mining activities in the park. A strategy has also been included to work towards an appropriate mechanism to exclude mining activities from the Dalhousie Springs.	2
29	Recommend that the plan provide an outline of the regulation of petroleum and mineral exploration and production activities in South Australia to a level of detail that is more informative to all stakeholders.	6, 7	Yes	The plan has been expanded to include information on the regulation of mineral and petroleum exploration and production activities in South Australia, and more specifically in Witjira National Park.	3
30	Queried the accuracy of information on the ecology of the Great Artesian Basin and Mound Springs.	7	No	No change. All information has been thoroughly reviewed for accuracy.	8
31	Theme 2 is by far the most important focus in caring for the park. Environmental protection should be emphasised in management plans, including at the exclusion of visitors	8	No	Environmental protection is already emphasised in this management plan.	5
32	Highlighted that responsible motorbike users who do not go off track cause less damage than 4WDs.	9	Yes	Theme 3 of the plan has been re-written to more clearly detail how visitor use is to be facilitated and managed.	1
33	Would like to see more recognition of past and future friends groups	10	No	Work that has been undertaken on park by the Friends of the Simpson Desert Parks has already been acknowledged in the plan.	5