

# Analysis of Public Submissions

## Nullarbor Parks Draft Management Plan

The Nullarbor Parks Draft Management Plan was released for public consultation from 26 October 2017 to 27 January 2018. Eighteen submissions on the draft management plan were received. These are summarised in Table 1.

Table 1 – Summary of submissions

Submission Number	Name	
1	Joanne Davidson, Research and Policy Manager	South Australian Tourism Commission
2	Julie Fiedler	Horse SA
3	Craig Wilkins, Chief Executive	Conservation Council of South Australia
4	Julia Peacock	Nature Conservation Society of South Australia
5	Peter Owen	The Wilderness Society SA
6	David Scotland	South Australian Chamber of Mines and Energy
7	John Barker	Department for Energy and Mining
8	Stuart Ross	Australian Rail Track Corporation Ltd
9	Nicholas White	Australian Speleological Federation Inc
10	Nicholas White	Victorian Speleological Society
11	David Gillieson	Individual
12	Susan White	Individual
13	Andy Spate	Optimal Karst Management
14	John Watson	Individual
15	Clare Buswell	Flinders University Speleological Society Inc.
16	Ian Lewis	Cave Divers Association of Australia
17	David Calnin	Australasian Cave and Karst Management Association
18	Steve Milner	Ancient Land Tours

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.



Table 2 – Summary of feedback

Comment No.	Comment	Sub No	Plan Amended	Proposed Response	Criteria
1	Expressed support for the plan.	1, 3,4,5,6	No	No change necessary	4
2	Requested that plan provide scope for horse or camel riding events under permit.	2	No	No change. Park regulations provide scope for these activities to be approved via a permit.	6
3	Expressed support for the development of the Far West Coast Healthy Country Plan as a basis for the park management plan.	3,4,5	No	No change necessary.	9
4	Expressed support for the continuation of the traditional owners in management, including elevation of the Nullarbor Parks Advisory Committee to board status.	3,4,5	No	No change. Any decision to alter the powers of the advisory committee rests outside of this planning process.	6
5	Recommendation that funding be pursued to employ Aboriginal rangers.	3,4,5, 17	No	No change. A strategy to facilitate employment of Aboriginal rangers is already in the plan.	5
6	Recommended the exploration of alternative ways to progress the aspirations of the Far West Coast Aboriginal people.	3,4,5	No	No change. The plan already provides scope for alternative approaches. However this suggestion will be passed onto the Advisory committee and local DEW staff.	5
7	Recommended that the plan highlight the importance of additional protected areas in building resilience against the effects of climate change.	3,4	Yes	Additional commentary about the importance of other protected areas has been added to Theme 1, page 10.	3
8	Recommended that the plan include a strategy to 'monitor the impacts of climate change to identify any changes toward increased desertification and adapt management practices to maintain ecological values'.	3	Yes	A strategy to monitor the impacts of climate change and to adapt management practices has been included in Theme 1, page 10.	3
9	Recommended inclusion of a strategy to ensure that the impact of current resource development activities is minimised	3, 17	Yes	The fifth strategy on page 10 has been reworded to encapsulate current resource development activities as well as future activities. Theme 1 has been expanded to give a more detailed explanation about threats to cultural values and karst values	2
10	Recommended that the plan explain that it is a strategic document, intended to outline key priorities rather than cover every management issue.	4	Yes	Further explanation about the plan's purpose and level of detail has been included in "Developing this plan" page 2	2
11	Requested that updates regarding implementation of the plan be provided	4	No	Processes for the implementation are beyond the scope of this plan. However this request will be passed onto the Advisory committee and DEW staff involved.	6
12	Expressed support for avoiding any new infrastructure in the Nullarbor Wilderness Protection Area	4	No	No change necessary.	9



Comment No.	Comment	Sub No	Plan Amended	Proposed Response	Criteria
13	Expressed opposition to the addition of Nullarbor National Park to the Nullarbor regional Reserve.	4	Yes	As Government is yet to make a decision on this matter, reference to this change in tenure has been removed from the plan	2
14	Recommended including reference to 2 species of conservation significance - Southern Hairy-nosed Wombat and Hill's Emu-bush.	4	Yes	A reference to the Emu-bush and the Southern Hairy-nosed Wombat and has been included in 'What are we looking after' on page 7..	1
15	Recommended including a list of all rare or threatened species as an appendix.	4	Yes	An appendix including all rare or threatened species has been included as an appendix.	3
16	Recommended including the management of threatened species in response to climate change as a challenge	4	Yes	Managing threatened species in response to climate change has been included as a challenge on page 8.	3
17	Recommended including the management of healthy dingo populations outside the dog fence as a challenge	4	No	Maintaining dingo populations south of the dig fence is contrary to Government's Policy on Management of Dingo Populations in South Australia.	7
18	Recommended providing further detail about the impacts of rabbits, Myxomatosis virus and rabbit Haemorrhagic Disease.	4, 17	Yes	The impacts of rabbits, Myxomatosis virus and rabbit Haemorrhagic Disease has been added to Theme 1, page 10.	2
19	Recommendation that the plan acknowledged the importance of habitat within the Nullarbor Regional Reserve for conservation of the Plains Wanderer, and that this area be managed in line with the recovery plan	4	Yes	Reference to the likely broader extent of the plain wanderer and the broader implication of the recovery plan for this species has been included in Theme 1.	2
20	Recommended that further detailed be provided to guide the maintenance of telecommunications infrastructure.	4	Yes	An explanation of best practice for the management of telecommunications infrastructure has been included in Theme 1, page 10	3
21	Recommended that the impact of inappropriate fire regimes be acknowledged.	4	Yes	An explanation of the impact of inappropriate fire regimes has been incorporated into Theme 1, page 10.	3
22	Recommended including an addition strategy about the management of rare or threatened species, and prevention of impacts associated with infrastructure.	4	Yes	A additional strategy focused on the protection of rare or threatened species has been included in Theme 1.	3
23	Recommended that the Nullarbor Wilderness Protection Area Visitor Management Strategy contain additional description of the key management issues	4	Yes	Additional detail has been provided to describe the type of activities that could affect this area unless carefully managed.	3
24	Recommended that the engagement of stakeholders is mentioned in the description of resource development approval process.	7	Yes	The engagement of stakeholders in the approval process has been incorporated into Theme 1. Page 10.	3



Comment No.	Comment	Sub No	Plan Amended	Proposed Response	Criteria
25	Recommended that the continued operation and maintenance of the Trans Australian Railway is recognised.	8	Yes	Allowing for the continued operation and maintenance of the Trans Australian Railway has been incorporated into 'What are the challenges and opportunities?' on page 8.	2
26	Recommended that specific speleological organisations and their contribution to management should be acknowledged.	9, 15, 17	Yes	An additional Theme has been added called: 'Conserving caves and karst features'. This Theme provides an overview of cave and scientific stakeholders.	1
27	Expressed the view that the plan does not adequately recognise or articulate the iconic values of the Nullarbor karst system.	9, 10, 11, 12, 13, 14, 17	Yes	An additional Theme has been added called: 'Conserving caves and karst features'. This Theme articulates the iconic values of the Nullarbor karst system. The section called 'Significance and purpose' has also been revised.  A specific section has been added that outlines the global significance of this karst system.	1
28	Expressed the view that the draft plan did not provide adequate and clear objectives, strategies, targets and performance indicators for the management of natural values within this landscape	9, 10, 11, 12, 14, 17	Yes	An additional Theme has been added called: 'Conserving caves and karst features'. This Theme provides an overview of cave stakeholders.	1
29	Highlighted that cavers and scientific study has played a more role in conserving karst features. Sought clarification regarding approval for recreational caving, archaeological survey and scientific investigation	9, 10, 12, 15, 16, 17	Yes	An additional Theme has been added called: 'Conserving caves and karst features'. This theme clarifies the processes for permitting any future access and interpretation of sites.	1
30	Recommended facilitating greater engagement of scientific specialists and cave stakeholders in the development of the plan and in the future management of the karst system	10, 11, 12, 14, 17	Yes	The facilitation of a forum and ongoing engagement of specialists and stakeholders has been incorporated into an additional theme called: 'Conserving caves and karst features'.	1
31	Recommendation that the Nullarbor Parks Advisory Committee fund management the necessary expertise, including karst management.	10	No	Funding matters are outside the scope of this plan. In addition, the advisory committee are not responsible for resource allocation. This recommendation has been passed onto DEW staff.	6
32	Expressed concern about the impact of recent resource exploration and recommended that stringent minimal impact codes be applied.	10, 13	No	Conditions on resource exploration are established through mechanisms other than this plan and are overseen by the Mineral Resources Group within the Department of the Premier and Cabinet. This feedback has been passed onto the Department of the Premier and Cabinet.	6
33	Expressed the view that the Nullarbor Wilderness Protection Area includes areas that are already developed do not meet the criteria for classification as wilderness.	10, 13, 17	No	No change. The review of land tenure is beyond the scope of this planning process.	6



Comment No.	Comment	Sub No	Plan Amended	Proposed Response	Criteria
34	Expressed the view that the plan did not provide sufficient detail in order to enable resource allocation and the monitoring and evaluation of goals, priorities and strategies	10, 11, 12, 13	No	No change. The plan is not intended to provide a framework for monitoring and evaluation. This plan (along with others) will guide resource allocation.	6
35	Expressed the view that the plan did not adequately draw on published information about cave geomorphology, palaeontology, archaeology, anthropology and other disciplines. Some key sources have been provided.	10, 11, 12, 15, 17	Yes	An additional Theme has been added called: 'Conserving caves and karst features'. This theme draws on some of the most important published information.	1
36	Recommended a more detailed map of park boundaries is included in the plan to ensure people are aware of the location of the parks	10	Yes	The map has been clarified. The need for more detailed maps has been passed onto DEW staff involved in visitor management.	2
37	Suggested that an Aboriginal ranger program be established to service campgrounds, conduct pest animal control and establish exclusion fencing.	10, 11, 15	No	The concept of Aboriginal rangers is already mentioned in the plan. It is not necessary to include all specific actions in a strategic plan such as this.	6
38	Recommended that additional flora and fauna survey work be undertaken.	10, 17	Yes	The final strategy in Theme 1, page 10 has been changed to encompass research to address gaps in knowledge about flora, fauna, geology, geomorphology, palaeontology, archaeology and other disciplines.	2
39	Recommended that the importance of cave deposits as a record of past climates and events be highlighted	10, 13	Yes	The importance of cave deposits as a record of past climates and events has been included in the section called 'What are we looking after?' on page 7	1
40	Recommended that there were additional heritage features in the parks that should be highlighted.	10, 17	Yes	A more expansive description of historical artefacts has been included in the section called 'What are we looking after?' on page 7	1
41	Expressed the view that the challenges and opportunities were idealistic statements.	10	No	The challenges and opportunities are intended to provide context. They are not intended to be specific and measurable.	8
42	Recommend that pest animal control be extended to include cats and foxes	10, 17	Yes	Strategies in theme 1 have been reworded to articulate the species that require management as well as those that are a priority.	3
43	Recommend that additional caves and rock holes be made available for visitors to access	10, 11, 15	Yes	Processes for the consideration of visitor access to caves (and interpretation) has been addressed in an additional theme called: 'Conserving caves and karst features'	3
44	Recommended that several campgrounds be established	10, 15, 17	No	The establishment of camping areas in this area is not supported due to the significant costs associated with maintenance	7



Comment No.	Comment	Sub No	Plan Amended	Proposed Response	Criteria
45	Recommended that plan encompass (or facilitate collaboration and integration) across the entire Nullarbor karst, including South Australia and Western Australia. Recommended that the 'Directions for management' section reflects the connectivity of the parks with a broader karst system and seascape.	11, 13, 14, 17	Yes	<p>It is beyond the capacity of the resources that are available for this work to develop a joint plan. However an additional theme called: 'Conserving caves and karst features' has been added which highlights the need for collaboration across the state boundary.</p> <p>Improving collaboration with the Western Australian Government, cave stakeholders and others has been included as a challenge in the section called "Challenges and opportunities"</p> <p>Under the additional theme called 'Conserving caves and karst features' an addition strategy has been included to collaborate with the Western Australian Government on Karst management activities.</p> <p>The Directions for management has also been revised to reflect this approach.</p>	3
46	Recommended that the plan be redrafted and re-released for public consultation	10, 12, 14	No	Feedback received and a forum with caving stakeholders will provide sufficient opportunity to address concerns raised about the draft plan.	7
47	Raised concern about a lack of karst and other scientific expertise on the advisory committee and offered assistance.	13	No	This matter is not within the scope of a planning process. However this opportunity will be communicated to the advisory committee and relevant DEW staff	6
48	Recommended that conservation works and rubbish removal be undertaken at Koonalda Homestead and nearby areas	15	Yes	A strategy relating Koonalda Homestead in Theme 3 has been revised to address conservation and rubbish removal needs.	1
49	Recommended that strategies be included to address illegal access into Koonalda cave. This could include a 'virtual' cave experience.	15	Yes	An additional Theme has been added called: 'Conserving caves and karst features'. This theme includes some priority actions including the development of strategies to prevent inappropriate or unmanaged access into caves.	1
50	Recommended that the track inside Koonalda cave be repaired.	15	Yes	An additional Theme has been added called: 'Conserving caves and karst features'. A strategy to develop a conservation plan for this cave has been included. This plan will consider management of the track.	3
51	Recommended that remote sensor counters be established in the 3 Murrawijinne caves and Koonalda cave to enable the assessment of visitor impacts	15	Yes	An additional Theme has been added called: 'Conserving caves and karst features'. A strategy has been included to monitor and address emerging visitor impacts. The value of remote sensors will be considered.	2
52	Raised concern about comments restricting cave access to 'certain people'	15	Yes	Statements about restrictions on access to caves has been clarified in an additional theme called: 'Conserving caves and karst features'	3



Comment No.	Comment	Sub No	Plan Amended	Proposed Response	Criteria
53	Expressed the view that the interests of cavers have been expressed in a negative tone and that this should be addressed.	15	Yes	The description of aspirations of cavers has been revised.	2
54	Recommended that the region and Koonalda Cave be nominated for world heritage listing	15, 17	Yes	An additional Theme has been added called: 'Conserving caves and karst features'. This theme includes a strategy to investigate a world heritage nomination.	2
55	Expressed opposition to covering the cost of cultural monitors during caving expeditions	16	No	Cultural monitors are required by the native title holders. Therefore this matter is beyond the scope of this plan.	7
56	Recommended that the section "Developing this plan" highlight that the parks have been included in a single plan because they share karst values	17	Yes	This section of the plan has been revised to highlight that the parks have been included in a single plan because they share karst values	2
57	Expressed support for inclusion of the national park within the regional reserve and recommended the establishment of a single protected area.	17	No	Changes in land tenure are beyond the scope of this planning process.	6
58	Expressed the view that the provisions of the <i>National Parks and Wildlife Act 1972</i> should have precedence over other legislation relevant to resource use.	17	No	The relationships between relevant legislation are complex and do not need to be explained in detail in a plan of this type. The National Parks Act does not have precedence in relation to the management of land on which resource development is authorised.	6
59	Recommended consistency in the use of the phrases arid and 'semi-arid'.	17	Yes	These terms have been revised to ensure consistency throughout the plan	1
60	Recommended including reference to proposed new parks in Western Australia	17	No	A decision on the establishment of these parks has not yet been made by the Western Australian Government.	6
61	Recommended a correction to information in 'Significance and purpose' about the creation of the Bunda Cliffs	17	Yes	This section of the plan has been revised.	3
62	Recommended that the section called 'Significance and purpose' is revised to highlight that the high level of endemism in cave fauna is only partially responsible for their significance.	17	Yes	This section of the plan has been revised to address this.	3
63	Queried visitation levels expressed in the section "Significance and purpose".	17	Yes	A broader description of the likely visitation has been provided in this section.	2
64	Recommended referencing Koonalda Cave as Koonalda Doline.	17	Yes	This name has been included throughout the plan as appropriate.	3
65	Recommended highlighting geomorphic and other values in the section called 'What are we looking after'	17	Yes	This section has been revised to include a description of these values	1
66	Recommended that cave diving be mentioned as a use	16, 17	Yes	This has been included in the additional theme called 'Conserving caves and karst features'.	3



Comment No.	Comment	Sub No	Plan Amended	Proposed Response	Criteria
67	Recommended the need to highlight the need for hunting safely in the section 'What are the challenges and opportunities'.	17	Yes	The third strategy has been revised to highlight safety.	3
68	Recommended a broader description of cave values in Theme 1, including speleothems, megafaunal sub-fossils and remarkably well preserved specimens of species such as thylacines.	17	Yes	The section called 'What are we looking after' has been expanded to include these values.	1
69	Suggested rewording regarding camels and their impact on water supplies	17	Yes	Theme 1, third paragraph has been revised.	2
70	Recommended that fire management should consider seasonal rains and their effect on annual grass growth.	17	No	No change. This level of detail is best addressed in the Alinytjara Wilurara Fire Management Strategy	6

