

Analysis of Public Submissions

Yellabinna and Warna Manda Parks Draft Management Plan

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

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 1 – Summary of submissions

Submission Number	Name and organisation
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 of Premier and Cabinet



Table 2 – Summary of feedback

Comment No.	Comment	Sub No	Plan Amended	Proposed Response	Criteria
1	Expressed support for the plan.	1,	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.	4
4	Expressed support for the continuation of the traditional owners in management.	3,4,5	No	No change necessary	4
5	Recommendation that funding be pursued to employ Aboriginal rangers.	3,4, 5	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 plan, access funds and 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 Board 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	Yes	The plan already addresses the importance of parks adjacent to the Yellabina Parks and their role in building resilience against climate change. A similar explanation in regard to the Warna Manda parks has been added to 'Warna Manda parks – significance and purpose' on page 7.	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	The final strategy on page 12 has been revised to encourage monitoring that will help to develop an improved understanding of the effects of climate change.	3
9	Recommended inclusion of a strategy to ensure that the impact of current resource development activities is minimised	3	Yes	The sixth strategy on page 10 has been reworded to encapsulate current resource development activities as well as future activities.	2
10	Expressed 'in principle' opposition to mining and exploration activities in parks.	3	No	As a result of their joint proclamation under section 43 of the <i>National Parks and Wildlife Act 1972</i> , resource exploration and development activities are allowed in certain parks. There the alteration of resource exploration and development entitlements is outside the scope of this planning process.	6
11	Requested to be kept informed of progress on implementation of the plan	3,4	No	No change necessary. This request has been passed onto the Board and DEW staff.	6



Comment No.	Comment	Sub No	Plan Amended	Proposed Response	Criteria
12	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	3
13	Suggested including the number of species listed under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> and the <i>National Parks and Wildlife Act 1972</i> .	4	Yes	Page 6 and page 8 have been revised to include the total number of listed species under each act.	3
14	Suggested that the plan include a list of rare or threatened species as an appendix	4	Yes	A list of rare or threatened species has been included as an appendix.	2
15	Suggested that the location of the Iluka Jacinth-Ambrosia mine be mentioned under 'Significance and purpose', and included in Figure 1.	4	Yes	These references to the Iluka Jacinth-Ambrosia have been incorporated.	1
16	Recommended including the management of specific 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 9.	2
17	Recommended that the delivery of conservation priorities identified in recovery plans be added as a challenge / opportunity	4	Yes	This has been included as an additional challenge on page 9.	2
18	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.	6
19	Recommended marking the Dog fence on Figure 1	4	Yes	The location of the Dog fence has been included in Figure 1	2
20	Recommended highlighting the ecological and cultural significance of dingos, and recommended citing the SA Wild Dog Strategic Plan	4	Yes	These references have included in Theme 1, Page 10-11.	2
21	Recommended that strategies for Zone 3 in the South Australian Buffel Grass Plan be explicitly referenced in the plan	4	Yes	A more detailed explanation of strategies for buffel grass management has been included in Theme 1, page 10-11.	2
22	Suggested that the monitoring of flora and fauna be added as a strategy	4	Yes	A strategy has been included to undertake monitoring of priority species has been included in Theme 1, page 12.	2
23	Acknowledge the connection to Country of the Far West Coast Aboriginal people and expressed support for monitoring to ensure that the take of species is sustainable	4	No	No Change necessary. This is already addressed in the plan.	5
24	Recommended that Theme 3 reiterate the threatening processes associated with vehicle access.	4	Yes	An explanation of this threat, and the approach to managing it has been included in Theme 3, page 15.	3



Comment No.	Comment	Sub No	Plan Amended	Proposed Response	Criteria
25	Recommended that the objective outlined in Theme 3 is broadened to ensure that any expansion of visitor experiences is done with careful consideration of sensitive natural and cultural values.	4	Yes	A description of processes for the planning and approval of any new visitor infrastructure has been included in the Theme 3 text.	2
26	Recommended that further detail be provided in theme 4 to describe the threats to the wilderness values of the Yellabinna Wilderness Protection Area	4	Yes	A more detailed explanation of threats has been included in Theme 4	2
27	Expressed support for references specific to the authorisation of resource exploration and extraction activities including water extraction for mineral sands mining	6	No	No change necessary.	4
28	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 the text describing resource exploration and development activities, Theme 1. Page 11.	2

