

# CARNAC ISLAND NATURE RESERVE

## ANALYSIS OF PUBLIC SUBMISSIONS TO THE DRAFT MANAGEMENT PLAN

Department of Conservation and Land Management  
for the  
Conservation Commission  
Perth Western Australia 2003

## INTRODUCTION

This document is an analysis of public submissions on the Carnac Island Nature Reserve Draft Management Plan 2002.

The Carnac Island Nature Reserve Draft Management Plan 2002 was released for public comment in December 2001 for a period of 5 months. Late submissions were accepted. A total of 22 public submissions were received. All submissions have been summarised and changes have been made to the plan where appropriate.

Following the release of the plan, advertisements were placed in local and Statewide newspapers advising that the draft management plan was available for comment. The draft plan was distributed to State Government departments, tertiary institutions, recreation and conservation groups, local authorities, libraries and other individuals who expressed interest during the preparation of the draft. Copies of the plan were available for perusal at Conservation And Land Management offices, City of Fremantle and City of Cockburn offices and libraries. The plan was available for purchase from Conservation And Land Management's State Operations Headquarters and its Marine Conservation Branch Office.

## ANALYSIS OF PUBLIC SUBMISSIONS

### Method of Analysis

The public submissions to the Carnac Island Nature Reserve Draft Management Plan were analysed according to the following process:

- The points made in each submission were collated according to the section of the draft plan they addressed.
- Each point made was assessed using the following criteria:
  1. The draft management plan **was amended** if the point:
    - (a) provided additional resource information of direct relevance to management;
    - (b) provided additional information on affected user groups of direct relevance to management;
    - (c) indicated a change in (or clarified) Government legislation, management commitment or management policy;
    - (d) proposed strategies that would better achieve/assist with management goals and objectives; or
    - (e) indicated omissions, inaccuracies or a lack of clarity.
  2. The draft management plan **was not amended** if the point:
    - (a) clearly supported the draft proposals;
    - (b) offered a neutral statement, or no change was sought;
    - (c) addressed issues beyond the scope of the plan;
    - (d) was already in the plan, or had been considered during plan preparation;
    - (e) was one amongst several widely divergent viewpoints received on the topic and the recommendation of the draft plan was still considered the best option;
    - (f) contributed options which were not possible (generally due to some aspect of existing legislation, Government or departmental policy);
    - (g) was based on incorrect information;
    - (h) involved details that are not appropriate or necessary for inclusion in a document aimed at providing management direction over the long-term..
- The reasons why recommendations in the draft plan were or were not changed, and the relevant criteria used, were discussed with each comment. Minor editorial changes referred to in the submissions have also been made.

Submissions have been assessed entirely on the cogency of points raised. No subjective weighting has been given to any submission for reasons of its origin or any other factor which would give cause to elevate the importance of any submission above another.

## Number and Origin of Submissions

The number and place of origin of submissions are listed below.

	Number	Percentage
Individuals	5	23
Community Organisations	5	23
Private Sector Corporations	7	32
Government: State	5	23
Local	0	0
<b>TOTAL</b>	<b>22</b>	<b>100</b>

A list of the people and organisations who made submissions to the Carnac Island Nature Reserve Draft Management Plan is given in Appendix 1.

## Analysis Table

The analysis table contains:

- The number of different points made about each section of the draft plan;
- A summary of each point made on the draft plan;
- The number of submissions making each point;
- An indication of whether or not the point resulted in an amendment to the final plan;
- Discussion on why certain points did not result in an amendment to the final plan, or an indication if action was taken in the final plan; and
- The criteria by which each point was assessed.

Com ment	No. of Sub- missions	Summary of Comment	Discussion/Action Taken	Plan Amended	Criteria
		<b>GENERAL</b>			
1.	1	Use full name and capital S and capital L when referring to a specific sea-lion species.	There are several opinions regarding the conventions that should apply here. According to the Commonwealth Government Publication; <i>Style manual – For authors, editors and printers</i> , the term ‘Australian sea-lion’ should be used.	No	2f
2.	1	In figure 2- Use word ‘Reserve’ rather than the arrow symbol – as the symbol will not mean anything to many people.	The symbol and number are not essential in this instance; change made to assist clarity.	Yes	1e
3.	2	The map is too general and requires greater specification, particularly in relation to access for visitors.	The map is intended as a guide to access restrictions on the Island. The extent to which the delineation of access areas can be indicated on a map is limited; this delineation will however be evident on-site via permanent field markers. The map has however been revised slightly to aid clarity.	Yes	1e
4.	1	Numbering sections would assist reader to find way around the Plan	Change made.	Yes	1e
5.	1	A booklet would be easier to read than the current pamphlet form.		No	2e
6.	1	Use abbreviation NR (for Nature Reserve) instead of CINR (for Carnac Island Nature Reserve).	Suggestion assessed but did not fit in to final layout.	No	2e
7.	1	Proposals/strategies were unclear, greater detail required.	In order for management plans to remain useful for 10 years or more, objectives and strategies are deliberately broad. More specific details of implementation are included in shorter term (eg annual or biannual) operational level plans.	No	2h
8.	1	Royal Perth Yacht Club not notified of plan release; many members make regular visits to Carnac Island.	The release of the Draft Management Plan was advertised in ‘The West Australian’ and local papers. The Club has now been added to the mailing list for the final management plan.	No	2b

Com ment	No. of Sub-missions	Summary of Comment	Discussion/Action Taken	Plan Amended	Criteria
9.	1	Marine section needs to be considered.	The waters surrounding Carnac Island are not currently managed by the Department. Until protected area status is achieved for the waters around the Island, environmental protection must be facilitated through liaison with a number of agencies with statutory responsibilities in marine matters (eg Department of Planning and Infrastructure, Fisheries Department, EPA/DEP).	No	2c
10.	9	Ranger presence around/on the Island is insufficient to protect the natural values from inappropriate visitor behaviour and ensure visitor safety, especially at times of peak visitation (eg long-weekends, school holidays).	Details such as staffing levels are not included in long-term planning documents. Even so, strategies will be put in place to ameliorate threats to the Island's values due to visitor non-compliance and/or lack of awareness (eg targeted ranger presence, greater emphasis on educating/informing visitors). A change has been made to this end (see <i>Recreation</i> Section of the Management Summary Table)	Yes	1a
11.	1	We recommend that on completion of the management plan the Hydrographic Survey Department be notified so that Carnac Island will have special notification on future charts as a marine reserve.	Carnac Island is not a marine reserve, but rather a terrestrial nature reserve. The recommendation is however noted and notification of the Hydrographic Survey Department may be appropriate at such time that the waters around Carnac become part of a marine protected area.	No	2c
12.	1	The beaches need to be monitored for, and cleaned of, large quantities of seaweed and other foreign matter that might be washed ashore after rough weather conditions.	Removal of natural materials such as seaweed would interfere with naturally occurring ecological balance/processes. Checks for other litter is routinely undertaken, however the plan is amended to explicitly state this management requirement.	Yes	1e
13.	1	A rainwater tank should be installed to provide potable water for CALM rangers and authorised persons and to help with any fires that might occur.	Given that visitation to the Island is limited to day use only, visitors and staff are required to provide for their own drinking water needs when visiting the Island. Also, the Island's seabirds would pose a drinking water contamination threat. It is not considered that fire control on the Island would be significantly improved by the installation of a rainwater tank.	No	2e
14.	2	Toilet and handwashing facilities that will not impact on the environment need to be provided on Carnac Island if regular access by staff and visitors will be occurring.	The relatively undisturbed and undeveloped state of Carnac Island is a unique value of the Island, and the installation of formal facilities such as shelters and toilets would detract from this value. Given that visitation to the Island is limited to day use only, visitors and staff are required to utilise facilities on board vessels.	No	2d

Com ment	No. of Sub- missions	Summary of Comment	Discussion/Action Taken	Plan Amended	Criteria
15.	1	<p><b>INTRODUCTION</b></p> <p>The fact that Carnac Island is a nature reserve that includes recreation in the reserve purpose should be stated specifically in the introduction, on Figure 2, under 'Managing Recreation and Tourism' and in the table (in 'Key Points' section under 'Recreational Use').</p>	Through the ongoing management planning consultation process, the Conservation Commission has requested that 'recreation' be removed from the purpose of the reserve (see <i>Existing Tenure</i> in Section B)	Yes	
16.	4	<p>The Shoalwater Islands Marine Park should be extended to include the entire chain of islands, rocks, reefs and habitats from Long Point through to Rottneest including Garden Island.</p> <p><b>MANAGEMENT DIRECTIONS AND PURPOSE</b></p> <p><b>CORPORATE MISSION AND VISIONS</b></p>	Extension of the Shoalwater Islands Marine Park has been proposed by the Marine Parks and Reserves Selection Working Group, and this is proposed to include the waters around Carnac Island. However, before boundary changes to that marine park can be considered, an indicative management plan for the proposed extension will be available for public and industry comment. Until protected area status is achieved for the waters around Carnac Island, environmental protection is facilitated through a number of agencies with statutory responsibilities in marine matters (eg Department of Planning and Infrastructure, Fisheries Department, EPA/DEP).	No	2c
17.	1	<p>Use an abbreviation for the <i>Conservation and Land Management Act 1984</i>, and for the Conservation Commission.</p>	An abbreviation has not been used for the Conservation Commission so as to avoid confusion with an abbreviation sometimes used for the Conservation Council. At the time of writing the abbreviation CALM is no longer being used as an abbreviation for the Department, 'CALM Act' will however be used as this is consistent with use in the Act itself.	Yes	1c
18.	1	<p>The mission statement and vision are more than adequate, but require physical action and 'hands-on' activity to achieve.</p>		No	2b

Com ment	No. of Sub- missions	Summary of Comment	Discussion/Action Taken	Plan Amended	Criteria
19.	1	The Draft Management Plan is an excellent strategy, the Corporate Mission and Visions and the proposal to include Carnac Island Nature Reserve within Shoalwater Islands Marine Park is supported  <b>LEGISLATIVE FRAMEWORK</b>		No	2a
20.	1	Nature Reserves are reserved under the <i>Land Administration Act 1997</i> and managed under the <i>Conservation and Land Management Act 1984</i>	Change made.	Yes	1e
21.	1	The term – ‘A’ Class Reserve should be defined  <b>MANAGING THE NATURAL ENVIRONMENT</b>	Change made.	Yes	1e
22.	1	This section does not cover issues such as where the Island will be managed from (eg ‘on-site’, Woodman Point, Garden Island).	This type of information is not generally included as the term of the Plan is up to 10 years or more, and administrative arrangements such as these may need to change over that time.	No	2h
23.	1	The plants, soils and animal life of Carnac Island should not be interfered with by any visitors or unauthorised persons at any time.  <b>NATIVE PLANTS AND PLANT COMMUNITIES</b>		No	2a
24.	1	Replace the word ‘Native’ in the heading ‘Native Plants and Plant Communities’ and throughout the document, with Indigenous, to reflect the terms that are used in the <i>Conservation and Land Management Act 1984</i> and in the <i>Wildlife Conservation Act 1950</i> .	It was considered that the meaning of the term ‘Native’ would be clearer to more people than the term ‘Indigenous’.	No	2e
25.	1	Irreversible damage to sea-grasses may be occurring due to lack of controls on anchoring.	See discussion for comment 9.	No	2c
26.	1	An extensive collection from a detailed survey undertaken by E.Ripley is held at Rockingham Regional Herbarium and would be a useful resource for the Department when undertaking vegetation surveys on the Island.	The existence of this additional resource information is noted and will be accessed as/when necessary.	No	2b

Com ment	No. of Sub- missions	Summary of Comment	Discussion/Action Taken	Plan Amended	Criteria
27.	2	Suggest Key Performance indicators relevant to this section be extended to decrease the number of, or area impacted by, introduced flora (ie reduced from the existing 63%). This would provide details of the feasibility of rehabilitating the vegetation on the Island.	KPI's have been amended and now incorporate the principle behind this submission comment (see Management Summary Table)	Yes	1d
28.	1	An additional strategy is recommended, that is, to actively rehabilitate with species native to the Island, in areas where weeds have been removed. Seed should be sourced from plants already on the Island.  <b>NATIVE ANIMALS AND HABITATS</b>	Rehabilitation along these lines is Departmental policy, however this point will be explicitly stated. Change made.	Yes	1e
29.	6	Witnessed several deliberate/accidental disturbances of island fauna, particularly sea-lions and/or seabirds	Such activities are illegal and this is clearly indicated in the Plan. Operational level plans will include strategies to ameliorate threats to the Island's values due to visitor non-compliance and/or lack of awareness (eg targeted ranger presence, greater emphasis on educating/informing visitors).	No	2b
30.	1	Replace the word 'Native' in the heading 'Native Animals and Habitats' and throughout the document, to Indigenous, so as to reflect terms that are used in the <i>Conservation and Land Management Act 1984</i> and in the <i>Wildlife Conservation Act 1950</i> .	It was considered that the meaning of the term 'Native' would be clearer to more people than the term 'Indigenous'.	No	2e
31.	2	Although little is known about the Island's invertebrate fauna it plays an important role in the provision of habitat/food for these animals, it is for example, used as a breeding site by the yellow admiral butterfly ( <i>Vanessa itea</i> ). Suggest text re this species is included in plan. A check on the entomology of the Island is a must.	Whilst further research into the entomology of the Island would be desirable, relatively speaking this is not a management priority and hence has not been specifically included as a management strategy.	No	2d
32.	1	<u>Sea –lions</u> New Zealand fur seals are more timid than the sea-lions, and restricted access is required to encourage these to haul out on the beach and hopefully establish a colony.		No	2a
33.	1	Consider making a more specific statement re the fact that the Australian sea-lion is 'a species in need of special protection' is cited in the <i>Wildlife Conservation (Specially Protected Fauna) Notice</i> , which is made under the <i>Wildlife Conservation Act 1950</i> .	This is covered to a sufficient extent in the 1 <sup>st</sup> paragraph under 'Sea-lions' in Section C	No	2d



Com ment	No. of Sub- missions	Summary of Comment	Discussion/Action Taken	Plan Amended	Criteria
34.	1	All visitors should remain 5 metres from any sea-lion that is on the beach	Under the <i>Wildlife Conservation Act</i> it is an offence under Section 16 to disturb fauna. Whilst merely maintaining a distance of 5 metres does not necessarily prevent disturbance, the maintenance of such a minimum distance assists in minimising disturbance to sea-lions and safety risks to humans. See <i>Sea-lions</i> in Section 3 of the Plan which has been amended to specify some rules to be followed when viewing sea-lions on Carnac Island.	Yes	1d
35.	1	<u>Sea-birds</u> Management action should be taken to protect vulnerable seabird species from undesirable changes caused by: 1. trampling and erosion from uncontrolled visitor activities 2. ‘increaser’ seabird species (ie those responding to fairly local, human induced changes in the availability of food) eg Silver Gulls and Pied Cormorants 3. the introduction or dominance of woody weeds and grasses Regular monitoring of visitor activity, ‘increaser’ seabird numbers and habitat quality should be undertaken.		No	2a
36.	2	People have been seen allowing their dogs and children to “run amok” through sea-bird nesting sites.	See discussion for comment 29.	No	2b
37.	3	Signs are not preventing disturbance to fairy terns nesting on the beach as many people will just ignore them	The Plan proposes strategies in addition to signage to prevent disturbance to nesting seabirds. Whilst some may ignore signs, many will act in accordance with these. Operational level plans will include strategies to ameliorate threats to the Island’s values due to visitor non-compliance and/or lack of awareness (eg targeted ranger presence, greater emphasis on educating/informing visitors).	No	2d

Com ment	No. of Sub-missions	Summary of Comment	Discussion/Action Taken	Plan Amended	Criteria
38.	1	Studies in other parts of the world suggest that an inter-visible distance of about 300metres between people and surface nesting sea-birds was necessary to prevent disturbance to colonies.	Temporary control areas could be declared over whatever area of beach is considered necessary to protect nesting seabirds.	No	2a
39.	1	Species such as Fairy Terns that nest intermittently on beaches are very vulnerable to disturbance. The only way to deal with this problem is regular surveillance for breeding activity during the breeding period and the deployment when necessary of mobile fencing and signage to maintain Critical Approach Distances.	The plan does not prevent the utilisation of fencing and signage as options if these are considered necessary. The plan is amended to specifically state that which was previously only implied in the draft management plan, that is, that regular surveillance will be required during the breeding period to identify the presence of nesting seabirds at risk from visitor presence so as to ameliorate risks.	Yes	1e
40.	1	The use of temporary control areas is unlikely to solve the problem of protecting species that nest or creche on beaches. Nesting locations change from year to year so the locations can not be predicted. The response time would be far too slow given that a temporary control area would first have to be declared before temporary barriers and signage could be deployed.	There are other legal mechanisms that could feasibly be used to control access around nesting seabirds if approval for a temporary control area could not be obtained quickly enough. There is for example, provision under the <i>Conservation and Land Management Act Regulations 2002</i> (Regulation 44) to quickly facilitate closure of an area of CALM-managed land if necessary. The Plan is amended to reflect the fact that more than one legal mechanism could be used to control access in such instances if necessary.	Yes	1c
41.	1	CALM should undertake a culling program of Silver Gulls and Pied Cormorants to restore ecological balance.	Experience from Australia and overseas has shown that culling operations on breeding sites is inefficient and ineffective in controlling silver gull numbers as remaining birds quickly replace culled animals. The Government has developed a Silver Gull Management Program aimed at co-ordinated action involving metropolitan councils, the Department and the community to more effectively address factors contributing to the increase in gull populations.	No	2d
42.	1	Many sea-bird populations on the Island are likely to be interconnected to seabird populations in the region and therefore exist as regional meta-populations. The existence of a variety of meta-populations in the area should be taken into consideration when developing KPI's. In such instances KPI's should be based on measuring long-term trends in populations in the region, rather than on short-term changes in species diversity on individual islands as proposed in the Draft Management Plan. The monitoring of seabird meta-populations should be integrated between the Fremantle Islands Group and responsible agencies (eg CALM, Rottneest Island Authority)	Change made (see Management Summary Table)	Yes	1d

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43.	1	<p>The following KPI's may be appropriate to measure success in protecting the Island's seabirds:</p> <ol style="list-style-type: none"> <li>1. Surface-nesting birds sensitive to human disturbance (eg Fairy, Caspian and Crested Terns), continue to nest successfully on Carnac Island.</li> <li>2. Approach distances to surface-nesting seabirds decrease or remain constant (a measure of increasing tolerance and habituation).</li> <li>3. The number of sea-bird species breeding in the region is stable or decreasing.</li> </ol> <p><u>Marine Fauna</u></p>	The suggested KPI's have been considered and have, to some extent, been incorporated into the final management plan.	Yes	1a
44.	1	<p>The intertidal zone is used for abalone fishing, an activity strictly regulated under the provisions of the <i>Fish Resources Management Act 1994</i> and managed through closed seasons, and bag and size limits. This activity is only permitted for six Sundays over a year period, and should be allowed to continue within the intertidal zone.</p> <p><b>ENVIRONMENTAL WEEDS</b></p>	As the intention behind the proposed prohibited access area was not to necessarily prevent access to the intertidal area, but rather, to the vegetated areas and specific areas of beach, the prohibited access area is to be more specifically defined so as to (generally) exclude intertidal areas. No access is however to be allowed to the western beaches and the prohibited access portion of the eastern beach.	Yes	1b
45.	2	Weed eradication program is supported, and is an important priority		No	2a
46.	1	Volunteers should be enlisted to assist with weed management activities.	See <i>Working with the Community</i> . The ways in which volunteers may be involved in management activities may be numerous and change over time. So it is not necessarily useful, for the purposes of the Plan, to specify further the types of volunteer programs that might be implemented.	No	2a, 2h
47.	1	In our experience on Carnac Island there is a constant turn-over of weed species. How will species number and cover be monitored (method and periodicity)?	The details of how monitoring programs will be conducted are not generally included in long-term management documents such as this plan. The approach/methods used for monitoring can then be readily altered if/as necessary to ensure that the most efficient and effective means are used. Department specialist branches are involved in the development and implementation of monitoring programs, and hence would provide advice on methods and periodicity. The utilisation of volunteers in the implementation of monitoring programs will also be considered at the time of implementation.	No	2h

Com ment	No. of Sub- missions	Summary of Comment	Discussion/Action Taken	Plan Amended	Criteria
48.	1	Invasion of exotic weeds is a problem and restoration is a must. Clearing should be undertaken for fenced exclusion zones that should be replanted with native species.  <b>PROBLEM AND DOMESTIC SPECIES</b>		No	2d, 2e
49.	1	There should be a total ban on dogs or cats going ashore, they must remain aboard a vessel.	This point is already clearly stated in Section C ( <i>Problem and Domestic Animals</i> ).	No	2a, 2d
50.	1	House Mouse should be controlled where there is a potential impact on existing species.  <b>FIRE</b>	House mouse is not <i>known</i> to pose a significant threat to any of the species currently on Carnac Island, and is likely to be having, relatively speaking, a minor potential impact on the Island's ecology.	No	2d
51.	1	What about the Fire Response Plan?	The development of a Fire Response Plan for high conservation value reserves is a standard procedure, however it bears mentioning in the management plan that one exists.	Yes	1e
52.	1	There should be a total ban on any sort of cooking using a naked flame on the beach area.  <b>LAND CLASSIFICATION</b>	This comment suggested that the discussion in the section <i>Fire</i> may have been ambiguous. The Plan is amended to clarify that regulations prohibiting the lighting of fires on the Island are in place, and that <i>illegal</i> lighting of campfires and lightning are the most likely cause of fire on the Island.	Yes	1e
53.	1	We support the limited access areas recommended under 'land classification'.		No	2a
54.	1	We agree with the proposed Prohibited Access Area.		No	2a
55.	1	Expand on what is meant by limited access.	Text amended to clarify 'limited access' as it applies to Carnac Island (ie day use only)	Yes	1e
56.	1	Place the word 'unmanaged' in front of the sentence 'Human use of Carnac Island Nature Reserve has the potential to damage its key ecological values.'	Change made.	Yes	1e

Com ment	No. of Sub- missions	Summary of Comment	Discussion/Action Taken	Plan Amended	Criteria
57.	1	The limited access classification assigned to the beach on the eastern side of the Island is supported, however we contend that recreational activity on the smaller lesser known beach near the south-western end of the Island, does not present a threat to the Island's flora and fauna, or human safety and should remain open to public access under limited/day access conditions.	The utilisation of the beach referred to does present particular concerns regarding public safety (eg from collapses of surrounding limestone structures) and hence will remain as "Prohibited Access".	No	2e
58.	1	Access should be limited to between sunrise and sunset.		No	2a, 2d
59.	1	The western bay should remain open as limited anchorage prevents over-use	See discussion for comment 57 and comment 9.	No	2c, 2e
60.	3	Restrict all visitors to the tidal zone (damp sand) area of the beach for a 15 minute time limit to take photographs of sea-lions, or rest after swimming to shore (this would discourage people from setting up "tent cities" and playing ball games on the beach)	The suggestion was considered but the access recommended in the draft plan was still considered appropriate at this time, The plan provides for passive recreational activities such as sightseeing and wildlife observation and does not allow activities such as the playing of ball games. Operational level strategies will be put in place to ameliorate threats to the Island's values due to visitor non-compliance and/or lack of awareness (eg targeted ranger presence, greater emphasis on educating/informing visitors). The use of beach umbrellas and small sun-shelters whilst not encouraged, is considered relatively benign and hence will not be prohibited at this stage. The plan is amended to clarify a position with respect to sun shelters and that the playing of ball games is not considered 'passive' recreational activity.	No	2d, 2e
61.	1	The beaches should be closed to protect both native fauna and humans		No	2d, 2e
62.	2	Sea-lions use the whole beach, not only the northern end.	Prohibiting access in accordance with the Plan ensures that certain areas of beach are available for exclusive use by sea-lions.	No	2d
<b>MANAGING OUR CULTURAL HERITAGE</b>					

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63.	2	This section is too general and should include more ideas for education boards and expand on historical aspects (eg the wreck of success).	Whilst a brief background of historical aspects has been included in the plan, the inclusion of greater detail is not considered necessary for the purposes of a management plan document. Further research regarding historical details for educational materials/interpretive signs are matters that are addressed as the plan is implemented.	No	2h
64.	1	A full archaeological survey should be conducted to identify significant sites (onshore and offshore), and input should also be obtained from the WA Museum.	Such surveys are undertaken by the Department when necessary to identify such sites prior to allowing potentially threatening activities, so that damage can be prevented. As access to the majority of the Island is prohibited, such a survey is unlikely to be necessary. Further research regarding historical details for educational materials/signs are matters that are addressed as the plan is implemented.	No	2h
		<b>INDIGENOUS HERITAGE</b>			
65.	1	Mention that 'registered site' refers to <i>Aboriginal Heritage Act 1972</i> .	Change made.	Yes	1c
66.	1	The Island's Aboriginal name should be fully explained in the plan.	Unfortunately we were unsuccessful in getting confirmation of the meaning of the Island's Aboriginal name.	No	2c
67.	1	There should be greater indigenous interpretation and cultural tourism at the Island.	Indigenous interpretation has been, and will remain one aspect of an interpretation strategy for the Island, however details for and regarding interpretation programs are not generally included in a management plan document. Tourism is not the Department's charter, however it may be that commercial tour operators licensed to visit on the Island may be interested in developing such products.	No	2h
		<b>NON INDIGENOUS</b>			
68.	1	Doesn't cover the whalers well - this was the only obvious sign of former habitation.	See discussion for comment 63.	No	2h
		<b>MANAGING RECREATION AND TOURISM</b>			

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69.	1	The Draft Management Plan recognises the importance of the Island's bird life, reptiles and mammals. These values should always remain the Island's priority in future management plans, not people visiting the island.		No	2a, 2b
70.	2	The number of passengers being allowed over to the Island is inappropriate.	The Plan contains provisions for monitoring of impacts of visitation on the Island and for appropriate adjustments, including limitations on visitor numbers, if/as necessary. Status reports and audits of the Plan will enable assessment of the effectiveness of visitor management strategies, and provide guidance for future management decisions.	No	2d
71.	1	In the absence of hardening, or other management controls, public visitation to small island nature reserves during spring and summer can lead to direct and indirect disturbance/impacts on wildlife, and such disturbance would appear to constitute an offence under the <i>Wildlife Conservation Act 1950</i> . The management plan for Carnac Island needs to re-assess the management of public visitation to ensure that it is consistent with the purpose of the reserve, and that it is being managed so as to prevent direct and indirect disturbance to wildlife.	Management controls to prevent disturbance/impact on wildlife are a major focus of the Plan and the prevention of disturbance to wildlife and wildlife habitat is both a stated and implied priority of the Plan.	No	2d
72.	1	Fishing activity on the intertidal areas of a nature reserve is an offence under Regulation 46 of the <i>Wildlife Conservation Act 1950</i> Regulations. Regulation 46 implies that on islands where visitor landings are to be permitted it will be necessary to designate boat access zones.		No	2g
73.	1	The Department's management control over adjoining intertidal areas should be exercised, if for no other reason than to buffer/control disturbance to wildlife on the Island (eg to establish Critical Approach Distances for breeding seabirds).		No	2d
74.	1	The erection of tents, umbrellas and cricket matches, if allowed, should only be allowed at the southern end of the bay, adjacent to the information deck.	See discussion for comment 60	Yes	1e
75.	3	Non-commercial recreational use is more of a threat to the Island's values than visitation that is subject to tour operator licence controls.		No	2b
76.	1	Restrict the group size on the beach for the recreation sector.	See discussion for comment 70	No	2d

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77.	1	Many recreational vessels indicate a failure to recognise the Alpha flag, and this raises concerns for the safety of our clients and the animals.	The fact that the waters surrounding Carnac Island are not managed by the Department places limitations on the management of such problems. Liaison with the Department of Planning and Infrastructure will assist to address these issues.	No	2c
78.	1	Recreational use of the island should be confined to those on non-commercial vessels only, should be subject to the Limited Access Area on the eastern beach, but should also include the western beaches.	Allowing access to both commercial and recreational groups provides greater equity in access by also providing opportunities for those who do not own or have access to recreational vessels. Also, see discussion for comment 57.	No	2e
79.	1	Proposals for hardened access-ways and public use areas must be based on a thorough knowledge of: <ul style="list-style-type: none"> <li>• The location, return frequency and seasonality of all seabird nesting areas.</li> <li>• The species specific responses to disturbance including functional Critical Approach Distances.</li> <li>• Other habitat values.</li> <li>• Erosion risks of hardened structures.</li> </ul>	The development of formal visitor facilities on the Island is discouraged in the Plan, so as to not detract from the aesthetic values provided by its relatively undeveloped state.	No	2d
80.	1	Human access to the vegetated area of the Island should be prohibited.		No	2a
81.	1	In addition to the prohibited access area of the north-eastern section of beach, we would support a public sea-lion viewing shelter constructed on the northwestern part of the eastern facing beach, to allow controlled/restricted/safe public viewing of the sea-lions. Connecting to the shelter could be a timber walkway with information plaques. Closures of sections could occur as necessary to protect nesting birds. Additional walkways to access the western beaches from the eastern beach would lessen impact to the environment.	See discussion for comments 57 and 79	No	2e
82.	2	<b>VISITOR ACCESS</b> There may be a need to prohibit anchoring within specified distance (eg 10 metres, 100 metres) from the beach to prevent large vessels anchoring on the beach and to improve safety for swimmers/snorkellers and sea-lions.	The fact that the waters surrounding the Island are not managed by the Department does place limitations on the management of such problems. Liaison with the Department of Planning and Infrastructure to establish mooring control areas, as indicated in Plan, and regarding other matters (eg speed limits), is required to address these issues. See also <i>Visitor Access</i> in Section E.	No	2c, 2d



Com ment	No. of Sub- missions	Summary of Comment	Discussion/Action Taken	Plan Amended	Criteria
83.	1	There should be some restriction on the number of vessels using anchors at the Island, particularly immediately off the main beach area (map attached to submission that suggests that restricted anchoring should apply to both the Eastern and Western Bay).	See discussion for comment 9 and 82. . See also <i>Visitor Access</i> in Section E.	No	2c
84.	2	Access to the two beaches in West Bay should be restricted to short term visitation to protect fauna that uses these two beaches.	See discussion for comment 57.	No	2d
85.	4	All vessels should moor off the beach and any visitors who wish to land on the beach should wade or swim ashore. No vessels of any size should be allowed to run up the beach.	See <i>Visitor Access</i> in Section E.	Yes	1d
86.	1	There should be no outboard motor use within 50metres of the beach.	See discussion for comment 82. The inclusion of information in interpretive materials and/or visitor education by staff will assist to encourage behaviours such as that suggested, to minimise disturbance to the Island's fauna.	No	2c
		<b>COMMERCIAL OPERATIONS</b>			
87.	1	Hasn't the Department stopped issuing licences for boat-based interactions with sea-lions?	Licences for boat-based interactions with sea-lions are still permitted. In-water interactions with sea-lions are not licenced.	No	2g
88.	1	Is it still the case that Licences for boat-based interactions with sea-lions do not allow for operators to land on the Island?	Yes, and licences to visit onto the Island are not permits for sea-lion interaction. Some operators may, however, have both types of licences.	No	2d
89.	1	Limitations on the numbers of operators is supported.		No	2a
90.	5	The pontoon/barge located near the Island (Currie Point) should be removed.		No	2c
91.	6	The pontoon diminishes aesthetic values, poses threats to safety and the environment, and/or is un-necessary (eg one or two moorings would do the same job with far less visual impact).		No	2c
92.	1	Fishing should not be allowed as discarded fishing lines etc are hazardous to sea-birds and sea-lions.	The fact that the waters surrounding the Island are not managed by the Department does place limitations on the management of such problems. However other agencies with statutory responsibilities in marine matters (eg Fisheries Department) do undertake programs to educate the public regarding the impacts of discarded fishing lines etc. Department officers also opportunistically inform visitors of such matters.	No	2c

Com ment	No. of Sub- missions	Summary of Comment	Discussion/Action Taken	Plan Amended	Criteria
93.	4	Consider the development of a mooring/anchorage plan/regime that provides for equitable outcomes for commercial and/or recreational vessels.	See discussion for comment 9.	No	2c
94.	1	Operators issued with Commercial Activity Licences for Carnac Island should have appropriate moorings installed to prevent seagrass bed degradation. The moorings should be installed and managed at the operator's expense.	See discussion for comment 9.	No	2c
95.	1	I have seen some commercial operators repeatedly/regularly speeding through the bay area risking the safety of swimmers, snorkellers and sea-lions.	See discussion for comment 82.	No	2c
96.	1	I have seen as many as three operators dropping people on shore at one time.	The behaviour of operators licensed to visit on Carnac Island can be regulated via licence conditions as necessary.	No	2b
97.	1	We believe it would be beneficial for operators to be issued with a record book to make and submit records of basic sea-lion data to CALM.	Operators that are licensed for boat based marine mammal interactions (under the <i>Wildlife Conservation Act 1950</i> ) are required to collect such records in accordance with their licence conditions. Requiring operators licensed under the <i>Conservation and Land Management Act 1984</i> to collect, as part of their licence conditions, the types of records suggested, could be utilised if this is considered necessary.	No	2h
98.	1	Commercial tour operator groups should be no larger than 15 persons at one time, and should not be allowed to land on the Island (ie looking not landing)	See discussion for comment 70. Under current licence conditions, no more than 15 people (including crew) are permitted to land on Carnac Island in a tour party at one time.	No	2d

Comment	No. of Submissions	Summary of Comment	Discussion/Action Taken	Plan Amended	Criteria
99.	1	<p>We believe the following steps are necessary for commercial tourism:</p> <ul style="list-style-type: none"> <li>• Generic product outlines need to be developed that support the interpretation plan for the Island's and enhance research, monitoring and enforcement capacity.</li> <li>• A precautionary limit needs to be set on the number and flow of people on the Island (commercial tour + informal recreational). Small numbers frequently and predicatably are preferable to large groups irregularly (Nisbet 2000, Dunlop 1996).</li> <li>• Licenses and conditions should ensure that the cap on the number and time-density of visitors is maintained.</li> <li>• Expressions of interest should be sought from commercial tourism proposals meeting the generic product specifications.</li> <li>• The best proposals, meeting the numbers cap, should be licensed and accredited as eco-tourism products for the Island.</li> <li>• The limited entry licences should be perpetually renewable subject to performance measures and compliance. Licenses should be made tradeable.</li> <li>• Intertidal and beach areas should be examined, and if necessary to protect marine life and on-island wildlife from disturbance, should be declared prohibited entry.</li> </ul>	<p>The Plan embodies the principles underpinning the comments by:</p> <ul style="list-style-type: none"> <li>• Establishing and monitoring standards for commercial tour operators licensed to visit Carnac Island (eg via expression of interest process, and the imposition of license conditions and accreditation requirements).</li> <li>• Establishing requirements for monitoring and assessment of impacts of visitation on natural values.</li> <li>• Managing visitor access via the <i>Land Classification</i> system.</li> </ul>	No	2e
100.	1	<p>We recommend that it be mandatory for commercial operators to have sullage tanks for appropriate sewage disposal and encourage it for private vessels.</p>	<p>The licences issued to operators to visit on Carnac Island apply to the licence holder, and not to the vessel, as the waters around the Island are not managed by the Department. However the ecological benefits provided by sullage tanks on vessels and the use of sullage pump-out is acknowledged and encouraged, and will be more-so, once the provision of sullage pump-out infrastructure is more readily available in the metropolitan area.</p>	No	2c
101.	1	<p>We recommend that Commercial Activity Licence holders be involved with a CALM steering committee to discuss the impact and scope of commercial tour operators visiting the Island as well as play a role with the development of commercial tours visiting the Island and in the development of tourism legislation for the area. CALM and NEAP should appoint the committee and the committee members should consist of the following:</p> <ul style="list-style-type: none"> <li>• Tour operators who visit the Island regularly; CALM representatives; NEAP representatives, WATC representatives, recreational users.</li> </ul> <p>If this is not possible, then at the very least licensed tour operators should have the opportunity to be involved with the Community Advisory Committee.</p>	<p>There is a CALM licensed operator on a Tourism Industry Reference Group. The Charter Boat Owners Association have a representative on the Carnac Island Nature Reserve Advisory Committee.</p>	No	2h

Com ment	No. of Sub-missions	Summary of Comment	Discussion/Action Taken	Plan Amended	Criteria
102.	1	Whilst there may be an argument for limiting visitor numbers in general, or restricting access to certain areas of Carnac Island, special consideration should be given to licensed commercial operators who provide highly qualified/experienced guides.	The extent of any further access restrictions will correlate to the degree of threat presented and the extent to which threats can be reasonably managed.	No	2d
103.	1	Our understanding of the Draft Management Plan, both actual and implied, is that there is absolutely no intention to allow “ uncontrolled commercial tourism operations” on Carnac Island. To imply otherwise is simply not correct.	The sentence has been re-worded to correct any ambiguity.	Yes	1e
104.	1	In our experience visitors taken to the Island by licensed commercial operators are better behaved, more responsible and more aware of their potential impact on the Island and its wild inhabitants.		No	2b
105.	1	We believe that any move in the future to discontinue commercial tours to the Island would be a sad loss for the tourism industry in WA.	See Discussion for Comment 102.	No	2d
106.	1	Accreditation under NEAP is made difficult by the fact that the office is in QLD. An alternative, WA based accreditation would be a cheaper, easier and better alternative.  VISITOR SAFETY	There are now two NEAP consultants for WA.	No	2c
107.	1	Refer to the Wildlife Conservation (Close Season for Marine Mammals) Notice 1998 requirement for the maintenance of minimum specified distances (10 m).		Yes	1e
108.	1	Does the Department have a moral responsibility to consider the safety and welfare of visitors to the Island?	Yes. The statement in the plan to which this submission refers, is in accordance with the Department’s visitor risk management policy.	No	2e
109.	1	Should the reference to the implementation of a visitor risk management program be included as a strategy in the table?	Strategy also included in <i>Recreational Use</i> section of the table	Yes	1d
110.	1	We are concerned about the safety of visitors and consider that there needs to be more restrictions placed on persons accessing the island.		No	2e, 2d
111.	1	With the number of swimmers and snorkelers we are surprised that there have not been any contact accidents with vessels reported.	See discussion for Comment 82.	No	2c

Comment	No. of Submissions	Summary of Comment	Discussion/Action Taken	Plan Amended	Criteria
112.	2	Vessel speed control zone required around the Island, to prevent/reduce collisions between boats and sea-lions.	See discussion for Comment 82.	No	2c
113.	3	We have seen small children dropped on the beach to amuse themselves with no adult supervision for a considerable time. Children should not be allowed on the beach without adult supervision.  <b>INVOLVING THE COMMUNITY</b>	The plan has been amended so as to now explicitly state that which had previously been assumed, ie that small children would not be left on the beach without adult supervision.	Yes	1e
114.	4	Volunteers/Voluntary Wardens could assist with managing visitor behaviour/education.  <b>INFORMATION, EDUCATION, INTERPRETATION</b>	Whilst the use of volunteers for such activities may be implemented, it is not considered necessary to state the specific nature of volunteer programs in the management plan document.	No	2h
115.	1	It was noted that this section included a reference to 'goals' of management for the Island, but as these have not been specifically stated in the plan, perhaps the reference should be to the 'vision'.		Yes	1e
116.	5	More, appropriately detailed information is required to facilitate visitor education and interpretation.	Whilst the Plan describes what the focus of education and interpretation should be, the inclusion of greater detail into the Plan is not considered necessary.	No	2h
117.	5	CALM should put more (or continued) effort into informing /educating the community about the impacts their actions can have on the flora, fauna and other natural values of Carnac Island. When approached about inappropriate behaviour, most people seem unaware of the consequences of their behaviour.		No	2a
118.	1	Information/education activities/materials should consider non-English speaking, or English as a second language groups.	Tour operators that have large numbers of Non-English/English as a second language groups need to take responsibility for ensuring visitors are aware of appropriate and safe behaviour when on the Island.	No	2c
119.	1	Perhaps the development of a small education centre manned by an education officer could be established in peak periods.	See discussion for Comment 79. The targeting of Ranger visits to peak visitation times will assist with educating/informing visitors.	No	2d
120.	2	Brochures regarding regulations that apply to Carnac Island should be included with annual boat registrations etc.	Whilst arrangements such as these could be used, they would be considered in implementation level plans, they need not be specified in a management plan.	No	2h

Comment	No. of Submissions	Summary of Comment	Discussion/Action Taken	Plan Amended	Criteria
121.	1	Visitors need to be informed of the impact that littering and leaving debris of fish cleaning on the Island can have.	The intended focus of education and interpretation programs is mentioned in the Plan, and would encompass information regarding these matters.	No	2a
122.	1	Signage clearly outlining appropriate behaviour around sea-lions, and to inform visitors that domestic animals are prohibited on the Island, is required.	The use of signage to inform visitors is merely one element of an overall strategy that is proposed to educate and inform visitors, and enhance their experience.	No	2a, 2d
123.	1	Too many signs will spoil the natural beauty of the Island.	See discussion for comment 122.	No	2a, 2d
124.	1	It would be a pity to have to rely on beach signage to inform visitors of regulations.	See discussion for comment 122.	No	2a, 2d
125.	1	The information post above the eastern facing beach is difficult and/or unsafe to access due to beach erosion. We suggest it be relocated to Currie Point with access by stairs from the very north-western part of the eastern facing beach.  <b>WORKING WITH THE COMMUNITY</b>		No	2d
126.	1	The comment referring to the establishment of an advisory committee should be included in the management summary table.		No	2d
127.	1	Link in with other groups (eg Recfishwest, Cockburn Sound Group, Living Water and Skin Diving Club, WA Spearfishing Commission).	These groups would be included in the general term “community”.	No	2a
128.	1	The National Trust should be involved if possible to assist funds for environmental work through the Australian Heritage Commission.	Resource matters such as these are not generally specified in management plan documents but are dealt with at an operational level.	No	2h
129.	1	Community employment programs could play a role with construction of walkways with funding from private enterprise and government developed programs.  <b>MONITORING AND IMPLEMENTING THE PLAN</b>	See discussion for comment 128.	No	2h
130.	1	The difference between status reports and audit should be made clearer.	Change made.	Yes	1e
131.	1	Implementation should be monitored after 2-3 years rather than 10.	It will be, in annual or biennial status reports. Additionally, a Conservation Commission audit generally occurs mid-term (eg 5 year) of the Plan.	No	2d

Com ment	No. of Sub- missions	Summary of Comment	Discussion/Action Taken	Plan Amended	Criteria
132.	1	An independent committee could be established to monitor and comment, with an annual report on development and progress.	Independent reviews are conducted by the Conservation Commission of WA. The timing of these audits is usually at the Plan's mid-term but they could occur at other times if the Commission deemed it necessary.	No	2f

## APPENDIX 1 :SUBMITTERS TO THE DRAFT MANAGEMENT PLAN

### **Individuals**

R.Cowley  
R P McMillan  
E. Allen  
D. James  
J. Thornton

### **Private Business Operators**

Rottnest Island Eco Boat  
Charter 1  
Sea-Reward Charters  
Oceanic Cruises  
Westend Charters  
Dave Kenny Marine  
Starsand

### **Community Organisations/Groups/Clubs**

Recfishwest  
Conservation Council WA  
Wildflower Society of WA  
Living Water Skin Diving Club  
Charter Boat Owners Association of WA

### **State Government**

Department of Fisheries  
Department of Conservation and Land Management Staff (X4)