

**SHARK BAY**

**WORLD HERITAGE PROPERTY**

**STRATEGIC PLAN**

**ANALYSIS OF PUBLIC SUBMISSIONS**

**TO THE DRAFT STRATEGIC PLAN**

Department of Environment and Conservation

Perth 2007



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## INTRODUCTION

This document is an analysis of public submissions to the draft strategic plan for the Shark Bay World Heritage Property 2006-2020. Comments have been detailed to the section of the draft strategic plan to which they refer.

The Shark Bay World Heritage Property draft strategic plan was released for public comment for a period of two months with submissions closing on 15 December 2006. A total of 21 public submissions were received. All submissions have been summarised and changes have been made to the plan where appropriate.

Following the release of the draft plan, advertisements were placed in local, regional and Statewide newspapers, advising that the draft strategic plan was available for comment. The draft plan was distributed to State Government departments, local government authorities, tertiary institutions, recreation, tourism and conservation groups, libraries, neighbouring property land holders, tourism operators, and numerous individuals who expressed interest during the preparation of the draft plan. Copies of the draft plan were available for perusal at Department and local libraries and local government offices.

## ANALYSIS OF PUBLIC SUBMISSIONS

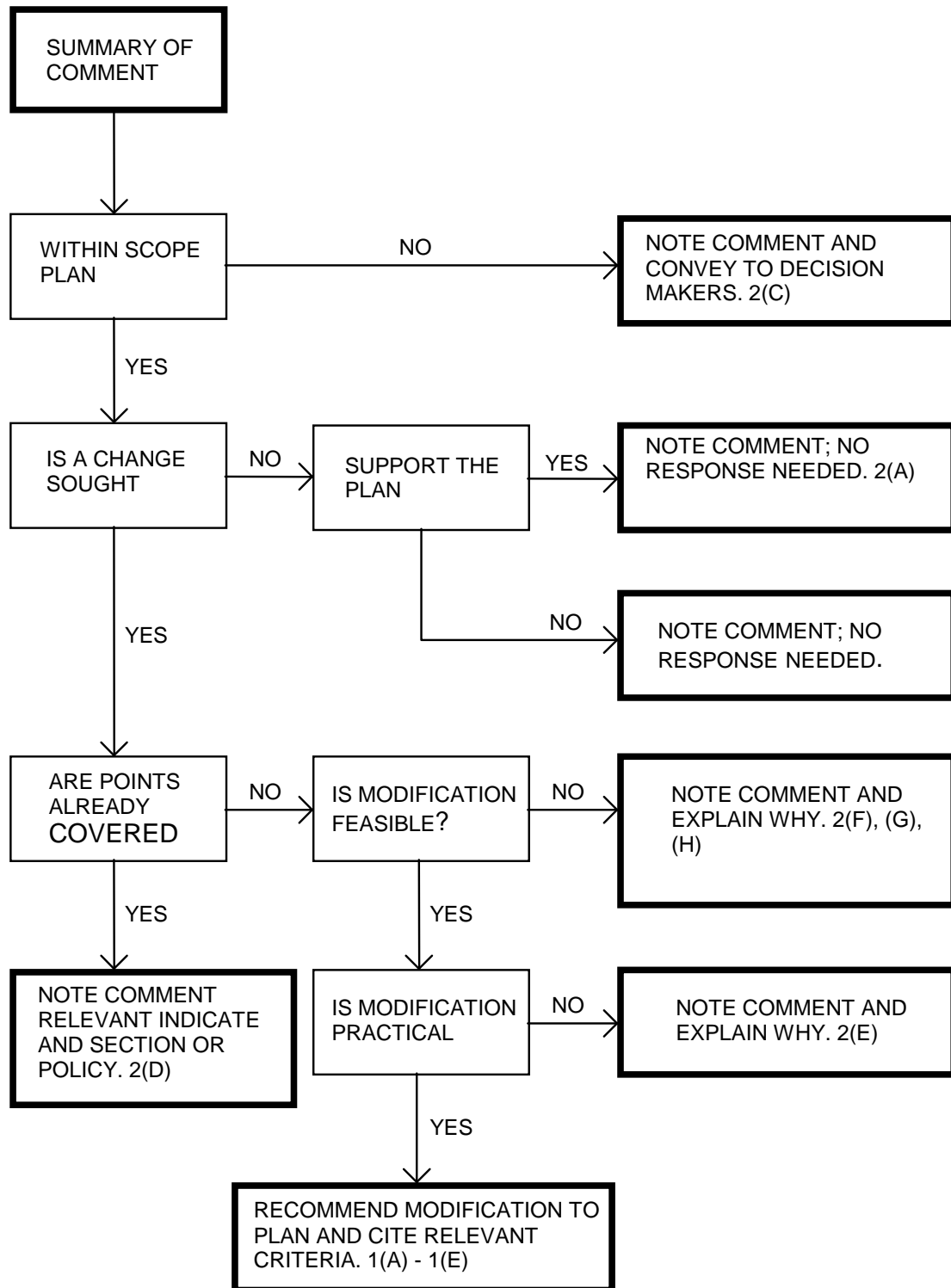
### Method of Analysis

The public submissions to the Shark Bay World Heritage Property draft Strategic Plan were analysed according to the process depicted in the flow chart (see Figure 1). More specifically:

- ❖ All comments were collated according to the section of the draft plan they addressed.
- ❖ Each comment was assessed using the following criteria:
  1. The draft plan *was* amended if the submission:
    - a. provides additional resource information of direct relevance to management;
    - b. provides additional information on affected user groups of direct relevance to management;
    - c. indicates a change in (or clarifies) Government legislation, management commitment or management policy;
    - d. proposes strategies that would better achieve management goals and objectives; or
    - e. indicates omissions, inaccuracies or a lack of clarity.
  2. The draft plan will *not* be amended if:
    - a. there is clear support for the draft proposals;
    - b. a neutral statement is offered or no change is sought;
    - c. a submission addresses issues beyond the scope of the plan;
    - d. a submission makes points which are already in the plan or were considered the best option;
    - e. a submission is one amongst several widely divergent viewpoints received on the topic and the recommendation of the draft plan is still considered the best option;
    - f. a submission contributes options which are not feasible, generally due to conflict with existing legislation, Government or Departmental policy;
    - g. was based on incorrect information; or
    - h. involved details that are not appropriate or necessary for inclusion in a document aimed at providing management direction over the long-term.

**FIGURE 1:**

**ANALYSIS PROCESS**



Comments made in submissions have been assessed entirely on the cogency of points raised. No subjective weighting has been given to any submissions 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	4	21
Community Organisations	3	14
Government (State)	14	67
<b>TOTAL</b>	<b>21</b>	<b>100</b>

A list of submitters to the draft plan is provided at Appendix 1.

## **ANALYSIS TABLE**

The analysis table contains:

- ❖ the number of different comments made about each section of the draft plan;
- ❖ a summary of each comment made on the draft plan;
- ❖ the number of submissions making each comment;
- ❖ an indication whether or not the comment resulted in an amendment of the final plan;
- ❖ a discussion on why the comment did not result in an amendment to the final plan, or an indication of what action was taken in the final plan; and
- ❖ the criteria by which each comment was assessed.

**TABLE 1: SUMMARY OF SUBMISSIONS**

<b>Comment No.</b>	<b>No. of Subs</b>	<b>Summary of Comment</b>	<b>Discussion / Action Taken</b>	<b>Plan Amended</b>	<b>Criteria</b>
1	1	<b>GENERAL</b> Replace use of CALM acronym.	Plan amended.	Y	2b
2	1	Strategic Plan makes no reference to built environment such as building style, colours and heights in towns and surrounds to be in sympathy with natural beauty of area.	Plan not amended. Any developments to comply with EPA guidelines and 4.3.5 Actions 4 and 5 refer to this. Town of Denham outside WHP.	N	1a
3	1	Change reference of DoE to DoW / DEC as appropriate.	Plan amended.	Y	1a
4	1	Plan provides important background information as to why and how area will be managed which will assist in the development and support of sport and active recreation activities.	Supports the Plan.	N	2a
5	1	Plan does not provide sufficient detail.	Plan not amended. Strategic Plan not to provide detail.	N	2c
6	1	Plan is poorly referenced and little opportunity to follow up aspects of interest.	Plan amended. Changes made to referencing and some CSIRO references added.	Y	1e
7	1	Documents referred to in Plan could be placed on the web.	Plan not amended. Not role of planning group to decide which documents placed on web.	N	2c
8	1	CCWA and MPRA to be listed as agencies having responsibility for implementing Strategic Plan.	Plan not amended. CCWA and MPRA only have responsibility for those lands and waters are conservation reserves. There are other lands and waters within the WHP that are not vested with CCWA or MPRA.	N	2f

Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
9	1	<b>1. INTRODUCTION</b> Add the words "world heritage management principles" in section 1.3.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
10	1	Strategic plan a guiding document and not statutory. Other detailed plans need to be consistent with Strategic Plan.	Supports the Plan.	N	2a
11	1	Stakeholders consulted in 1994-95 are no longer current.	Plan not amended. Stakeholder consultation information is in Introduction section and provides context.	N	2b
12	1	<b>2. BACKGROUND</b> Recognises Australia's obligations to manage the Property under World Heritage Convention.	Supports the Plan.	N	2a
13	1	Recognises sport/active recreation activities should not compromise world heritage values.	Supports the Plan.	N	2a
14	1	Data be updated to 2006.	Plan amended. Submission provides clearer explanation.	Y	1e
15	1	Cultural heritage is not just sites but may include landscapes, place, language and is a living culture. Change first sentence to reflect this.	Plan amended. Submission provides clearer explanation.	Y	1e
16	1	<b>3. ADMINISTRATION</b> Plan needs to clearly set out proposed methods for public consultation.	Plan not amended. The CCC will continue to be the primary vehicle for public consultation.	N	1f
17	1	DEH notes Figure 4 does not exist, change to Figure 2	Plan amended. Submission provides clearer explanation.	Y	1e



<b>Comment No.</b>	<b>No. of Subs</b>	<b>Summary of Comment</b>	<b>Discussion / Action Taken</b>	<b>Plan Amended</b>	<b>Criteria</b>
18	1	Given the importance of the area to the native title claimants, it is necessary to ensure that representatives from the native title claim groups have a stronger voice on the community consultative committee than other persons in the community such as 25% of positions being for Indigenous people.	This proposal is not consistent with the 1997 State-Commonwealth Agreement. Representation is written into the Terms of Reference and the CCC and SAC do not have authority to change them. Representation on WH committees is under review.	N	1c
19	1	Need to develop options for formal consultation and representation on CCC such as joint management similar to a Park Council, co-management or compulsory native title representation.	This proposal is not consistent with the 1997 State-Commonwealth Agreement or the Terms of Reference for the WHP committees which are about protection of universal natural values. Aboriginal people are on CCC. Representation on WH committees including Indigenous people is under review.	N	1c
20	1	Provide alternative terminology and clarity with respect to Native Title legislation.	Plan amended. Submission provides clearer explanation.	Y	1e
21	1	Not all cultural sites are unrecorded and document needs to reflect this.	Plan amended. Submission provides clearer explanation.	Y	1e
22	1	Primary goal to be reworded because not possible to "rehabilitate values".	Plan amended. Submission provides clearer explanation.	Y	1e
23	1	Relocate summary of goals from chapter 3 to 4.	Plan amended. Goals are to be stated in chapter 4.	Y	1e
24	1	Change terrestrial plan date to 2000-2009 and delete Monkey Mia Reserve plan	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a

Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
25	1	<b>4. MANAGEMENT GOAL, OBJECTIVES, STRATEGIES AND ACTIONS</b> The statement "Further research is required" does not provide the detail on what research will be undertaken which is to be expected in a management plan.	Plan not amended. Document is not a management plan but a strategic plan and therefore not meant to provide the specific detail of research.	N	1c
26	1	<b>4.1 Goal, Objective, Strategies and Actions for Identification</b> Strategies and Actions in section 4.1 could relate to cultural as well as biological values.	Plan amended. Submission provides clearer explanation.	Y	1e
27	1	<b>4.2 Goal, Objectives, Strategies and Actions for Protection</b> <b>4.2.2 Tenure</b> Tenure descriptions to be consistent with other planning documents.	Plan amended in part. However submitter has mis-interpreted terminology used to describe recreation planning as compared to tenure.	Y	1e, 2f
28	1	Seabed is vested with the Minister for Transport under the Marine & Harbours Act, and Carnarvon port area under the Shipping and Pilotage Act. Maps were provided. Plan needs to reflect dual vesting.	Plan amended. Submission provides information that better reflects legislative situation.	Y	1c
29	1	Need to confirm the Useless Loop port facility is excluded from WHP.	Useless Loop Port Facility is excluded from WHP.	N	1d
30	1	Proposed tenure changes will limit Indigenous access and alternatively increase public access to cultural sites.	Plan amended. Plan to clearly state proposed tenure changes likely to result in opposite, i.e. increased protection of cultural sites and restricted public access.	Y	1e

Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
31	1	<b>4.2.3 Environmental Impact Assessment</b> Assessment of development proposals to include 'State Coastal Planning' policy and 'Country coastal planning policy' requirements.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
32	1	Add information about the 'Country Coastal Planning' policy considers drainage patterns, nearshore sediment transport patterns, water quality, marine habitat, nesting or breeding fauna, visual amenity when assessing development proposals.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
		<b>4.3 Goal, Objectives, Strategies and Actions for Conservation</b>			
		<b>4.3.1 Integrity of World Heritage Areas</b>			
33	1	Monitoring needs to specifically relate to Shark Bay's world heritage values.	Plan not amended. Action to monitor condition of WH values and integrity of WHP present plus need to provide reports (see 4.3.1)	N	
34	1	Change reference from page 10 to page 11	Plan amended. Submission provides clearer explanation.	Y	1e
		<b>4.3.2 Research and Monitoring</b>			
35	1	Add WA Museum to list of organisations to be included.	Plan amended	Y	1d
		<b>4.3.3 Conservation of native Flora and Fauna</b>			
36	1	Supports objective and Actions in section 4.3.3	Supports the Plan	N	2a
37	1	Update information on Recovery Plans.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
38	1	Update information on reintroductions to Faure Island.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
39	1	Section 4.3.3 focuses on CALM's activities alone and undervalues contributions by other agencies and groups.	Plan amended. Submission provides additional information.	Y	1a

Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
40	1	Role of Heirisson Prong group as suppliers of animals needs to be recognised.	Plan amended. Submission provides additional information.	Y	1a
41	1	Western barred bandicoots and greater stick nest rats have also been introduced to Faure Island.	Plan amended. Submission provides clearer explanation.	Y	1e
42	1	Source of threatened flora information to be made clearer so others can access it or have access to published list.	Plan not amended. WA Herbarium is the source of the information and this is noted in plan.	N	2c
43	1	Acronym 'UCLCBP' is incorrect and should be 'ULCBPG'.	Plan amended	Y	1e
44	1	There are few references to CSIRO's 15 year effort on threatened mammals and management of predators.	Plan amended. Submission provides additional information.	Y	1a
45	1	Heirisson Prong group incorrectly named.	Plan amended. Submission provides clearer explanation.	Y	1e
46	1	Add protection of natural features of the coast including coastal habitats, and biodiversity, cultural, archaeological, ethnographic, geomorphological, visual and wilderness values.	Plan not amended. Protection of these values are adequately covered in appropriate sections of the plan.	N	2a
		<b>4.3.5 Conservation of Marine Formations and Terrestrial Landforms</b>			
47	1	Add protection of natural features of the coast including coastal habitats, and biodiversity, cultural, archaeological, ethnographic, geomorphological, visual and wilderness values.	Plan not amended. Protection of these values are adequately covered in appropriate sections of the plan.	N	2a
		<b>4.3.6 Conservation of Landscapes and Seascapes</b>			
48	1	Query raised about what does 'conservation of landscapes and seascapes' actually mean and could an example be provided.	Plan amended. Submission provides clearer explanation.	Y	1e

Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
49	1	Add information about the Country Coastal Planning policy considers drainage patterns, nearshore sediment transport patterns, water quality, marine habitat, nesting or breeding fauna, visual amenity when assessing development proposals.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
50	1	Add protection of natural features of the coast including coastal habitats, and biodiversity, cultural, archaeological, ethnographic, geomorphological, visual and wilderness values.	Plan not amended. Protection of these values are adequately covered in appropriate sections of the plan.	N	2a
51	1	<b>4.3.7 Conservation of Cultural Heritage</b> The Shire of Shark Bay's Municipal Inventory should be incorporated into the Strategic Plan and regularly updated.	Plan not amended. Not purpose of strategic plan to provide Municipal Inventory and no mechanism to provide regular updates. In addition many places on Inventory within town of Denham which lies outside World Heritage Property. Inventory is role of LGA.	N	2c
52	1	Reference to Municipal Inventory should be made.	Plan amended. Reference to Municipal Inventory is made.	Y	1e
53	1	Importance of cultural heritage needs to be understood and supported by the community through interpretation and heritage agreements.	Plan not amended. Action 4 re interpretation and education adequately addresses this point.	N	2a
54	1	Heritage practice guidelines (e.g. conservation, management, interpretation) be established in consultation with National Trust and Heritage Council.	Plan amended. Text will be expanded to include reference to National Trust and Heritage Council.	Y	1a
55	1	Develop strategies to increase awareness of heritage.	Plan amended. Action 4 re interpretation, education stated but will be expanded.	Y	1a
56	1	Make several specific corrections, additions provided to text of section 4.3.7.	Plan amended. Submission provides additional and more accurate, clearer information.	Y	1a, 1d, 1e

Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
57	1	Make statement that DIA is responsible for administration of Aboriginal Heritage Act which includes protect and management of Aboriginal sites in consultation with Aboriginal community, not just Aboriginal heritage management.	Plan amended. Submission provides information that better reflects legislative situation.	Y	1c
58	1	Cultural heritage protection is just as important as natural heritage	Plan not amended. Although cultural heritage protection is important, this is a strategic plan for a WHP based on its "natural" values.	N	2c
59	1	Cultural heritage section lacks detail.	Plan amended. Indigenous and non-Indigenous cultural heritage to be separated and some additional information provided.	Y	1a
60	1	A management framework for protection of cultural heritage be established and a cultural heritage plan and cultural heritage panel is proposed.	Plan not amended. This issue is being addressed through the terrestrial reserves planning process.	N	1b
61	1	Develop a cultural heritage plan.	CCC and SAC are supportive of a cultural heritage plan being developed but this is outside the terms of reference of the WHP committees and may be best driven by Aboriginal people themselves and through Minister for Culture and the Arts. In addition such a plan may be best developed in conjunction with appropriate land managers.	N	2c
62	1	Establish a cultural heritage panel.	CCC and SAC are supportive of a cultural heritage panel being developed but this is outside the Terms of Reference for the WHP committees. This pint should be taken up with respective land managers, Minister for Culture and the Arts.	N	2c

<b>Comment No.</b>	<b>No. of Subs</b>	<b>Summary of Comment</b>	<b>Discussion / Action Taken</b>	<b>Plan Amended</b>	<b>Criteria</b>
63	1	Update reference to DHI being on national heritage list	Plan amended. Submission provides clearer explanation.	Y	1e
64	1	Remove last sentence form paragraph 9 because not totally accurate.	Plan amended. Submission provides clearer explanation.	Y	1e
65	1	Remove last sentence from paragraph 10 because not totally accurate.	Plan amended. Submission provides clearer explanation.	Y	1e
66	1	Change last sentence in paragraph 11 to make clearer.	Plan amended. Submission provides clearer explanation.	Y	1e
67	1	Add pearling to list of industries.	Plan amended. Submission provides clearer explanation.	Y	1e
68	1	List of Bowdler references same as earlier in document and therefore not necessary to include here.	Plan not amended.	N	2d
69	1	Mention of Lock Hospitals requires reference	Plan amended. Submission provides clearer explanation.	Y	1e
70	1	Cape Inscription reference made twice in different paragraphs but would be better combined.	Plan amended. Submission provides clearer explanation.	Y	1e
71	1	Location of 'Gundrum' shipwreck not clear.	Plan not amended. Source document does not provide any clearer description.	N	2d
72	1	Strategy and Action required for documenting remains of pearling camps, especially ones on Heirisson Prong.	Plan not amended. Although no specific reference made to Heirisson Prong, strategy and action covers need for research and monitoring of heritage places and people.	N	2d

Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
73	1	Add protection of natural features of the coast including coastal habitats, and biodiversity, cultural, archaeological, ethnographic, geomorphological, visual and wilderness values.	Plan not amended. Protection of these values are adequately covered in appropriate sections of the plan.	N	2a
		<b>4.3.8 Pollution</b>			
74	1	Greenhouse gas emissions need to be referred to as well as need to gain knowledge to reduce impacts of global warming on WHP.	Plan not amended. Information on Climate Change and greenhouse gas emissions provided in 4.3 15.	N	2d
75	1	Contaminated Sites' legislation needs to be referred to.	Plan amended. Submission provides additional information and clarifies legislation.	Y	1c, 1e
76	1	Action 6 to monitor cruise ships ballast and sullage disposal is supported.	Supports the Plan.	N	2a
77		An Oil Spill Contingency Plan exists for WA and Useless Loop port. Development of separate for OSCP for Shark Bay not supported although a 'sub-plan' could be developed. DOIR to be added to responsibility list.	Plan amended. Submission provides information that more accurately reflects issue. Action 3 to be reworded.	Y	1d
78	1	All petroleum operators are required to submit a OSCP. DoIR to be kept informed of any OSCP developed.	Plan amended. Submission provides clearer explanation.	Y	1e
79	1	Implications of SBSJV dredging and discharge of bitterns has on water quality to be documented.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
80	1	Mandatory Australian Government ballast water management arrangements for commercial ships administered by AQIS should be documented.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a



Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
81	1	<b>4.3.9 Introduced Plants</b> International Convention for Control and Management of Ships' Ballast Water and Sediment' and Intergovernmental agreement to be documented.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
82	1	National Weed Strategy and State Weed Plan to be documented.	Plan amended. Submission provides additional information and clarifies legislation.	Y	1c, 1e
83	2	Table 2 lists only 11 weed species when there are 21 on Faure Island alone. Table 2 list seems inadequate.	Plan not amended. Table 2 only lists weed species rated as 'High' in Environmental Weed Strategy, not all weed species.	N	2d
84	1	Reference to 'Shark Bay Salt' requires clarification.	Plan amended. Submission provides clearer explanation.	Y	1e
85	1	Introduction of non-indigenous plant species (NIS) more likely from hull fouling and recreational vessels than ballast water discharge.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
86	1	Further baseline surveying of NIS for Shark Bay is recommended, particularly in natural habitats of high conservation value away from high use "port" sites that were previously assessed.	Plan amended. Submission provides information that more accurately reflects issue and need to monitor both natural habitats and port sites.	Y	1a
87	1	Pelagic NIS have yet to be assessed in Shark Bay.	Plan amended. Submission provides new information on pelagic NIS.	Y	1a
88	1	Impact of NIS in Shark Bay requires further research.	Plan amended in "Introduced Animals" section. Action 7 (Introduced Plants) reflects need for further research and will be duplicated in Introduced Animals section.	Y	1d

Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
89	1	Plan quote from Wyatt "designed and developed a monitoring program that provides for on-going identification of the presence of foreign marine biota" is not correct. Plan should state "monitoring program of natural habitats and port sites required".	Plan amended.	Y	1e
90	1	Additional Action re rapid response to any incursions of marine pest species should be added.	Plan amended. Action 5 (Introduced Plants and Introduced Animals) modified to include control as high priority.	Y	1d
91	1	Mandatory Australian Government ballast water management arrangements for commercial ships administered by AQIS should be documented.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
		<b>4.3.10 Introduced Animals</b>			
92	1	Acronym 'UCLCBP' is incorrect and should be 'ULCBPG'.	Plan amended	Y	1e
93	1	There are few references to CSIRO's 15 year effort on threatened mammals and management of predators.	Plan amended. Submission provides additional information.	Y	1a
94	1	Heirisson Prong group incorrectly named.	Plan amended. Submission provides clearer explanation.	Y	1e
95	1	The National Introduced Marine Pest Coordination Group has replaced the Australian Ballast Water Management Advisory Council.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
96	1	There are no feral goats on Faure Island. Sheep remain. No control program for house mice.	Plan amended. Submission provides clearer explanation.	Y	1e
97	1	Why is a reference to mice on Faure Island required?	Plan amended. Sentence removed.	Y	1e

<b>Comment No.</b>	<b>No. of Subs</b>	<b>Summary of Comment</b>	<b>Discussion / Action Taken</b>	<b>Plan Amended</b>	<b>Criteria</b>
98	1	Cheng (2002) undertaken only formal cat control study.	Plan amended. Submission provides clearer explanation.	Y	1e
99	1	On Heirisson Prong, rabbit control ceased in 1995, cat control undertaken by CSIRO, CSIRO's involvement ceased in 2005.	Plan amended. Submission provides additional information.	Y	1a
100	1	Rabbit calicivirus has been introduced to Heirisson Prong.	Plan amended. Submission provides additional information.	Y	1a
101	1	Introduction of non-indigenous animal species (NIS) more likely from hull fouling and recreational vessels than ballast water discharge.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
102	1	Further baseline surveying of NIS for Shark Bay is recommended, particularly in natural habitats of high conservation value away from high use "port" sites that were previously assessed.	Plan amended. Submission provides information that more accurately reflects issue and need to monitor both natural habitats and port sites.	Y	1a
103	1	Pelagic NIS have yet to be assessed in Shark Bay.	Plan amended. Submission provides new information on pelagic NIS.	Y	1a
104	1	Impact of NIS in Shark Bay requires further research	Plan amended in "Introduced Animals" section. Action 7 (Introduced Plants) reflects need for further research and will be duplicated in Introduced Animals section.	Y	1d
105	1	Plan quote from Wyatt "designed and developed a monitoring program that provides for on-going identification of the presence of foreign marine biota" is not correct. Plan should state "monitoring program of natural habitats and port sites required"	Plan amended	Y	1e

Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
106	1	Mandatory Australian Government ballast water management arrangements for commercial ships administered by AQIS to be documented.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
107	1	Additional Action re rapid response to any incursions of marine pest species to be added.	Plan amended. Action 5 (Introduced Plants and Introduced Animals) modified to include control as high priority.	Y	1d
108	1	<b>4.3.11 Fire</b> Strategies on fire research do not include protection of biodiversity.	Plan amended. Plan mentions fire ecology but text modified to include emphasis on "biodiversity conservation".	Y	1e
109	1	Use of fire as management tool is not recommended.	Plan not amended. Contrary to Department policy.	N	2f
110	1	Native title claim groups are to be consulted to acquire knowledge about fire regimes, ecology and species.	Plan not amended. CCC and SAC are supportive of native title claim groups being consulted but this is outside the terms of reference for the WHP committees. Aboriginal people are committee members. More appropriate this issue is addressed by land holders/managers.	N	2c
111	1	Importance of protecting biodiversity values from fire to be added to text.	Plan amended.	Y	1c
112	1	Action on protection of biodiversity to be added.	Plan amended.	Y	1e
113	1	Action 1 seems to contradict with Action 5 and no mention of adaptive management.	Plan amended.	Y	1d

Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
114	1	Action 1 to be amended: "Contain wildfires through interagency support such that World Heritage values are protected to the greatest degree practicable by the most appropriate means available taking into consideration the values of the park".	Plan amended. Two actions to be amalgamated and "smallest possible area" deleted.	Y	1d
115	1	New Action required: "Facilitate and incorporate the results of research into fire prevention, fire control, fire ecology and fire behaviour in the World Heritage Property into fire management and suppression programs in consultation with the Conservation Commission, where relevant".	Plan amended. Action statement added with minor variation.	Y	1d
		<b>4.3.12 Recreation</b>			
116	1	Tourism WA to be added to list of organisations having responsibility to Actions 2, 3 and 4	Plan amended. Submission provides clearer explanation.	Y	1d
117	1	Recreational activities supported but sites and activities need to be managed to prevent degradation of coastal features and Property values.	Supports the Plan.	N	2a
118	1	Native title claim groups to be consulted about recreation site developments and production of the Recreation and Tourism Plan for the WHP.	Plan not amended. CCC and SAC are supportive of native title claim groups being consulted but this is outside the terms of reference for the WHP committees. Aboriginal people are committee members. More appropriate this issue is addressed by land holders/managers.	N	2c
119	1	Recommends identifying those recreational activities having minimal negative impact on World Heritage values.	Plan amended. Submission provides clearer explanation.	Y	1a

Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
120	1	Proposed tenure changes will limit Indigenous access and alternatively increase public access to cultural sites.	Plan amended. Plan to clearly state proposed tenure changes likely to result in opposite, i.e. increased protection of cultural sites and restricted public access.	Y	1e
121	1	Strategic plan makes no reference to 'coastal foreshore reserve' or 'public interest' or 'foreshore management plan', a requirement of any proposed developments or subdivision on or adjacent to the coast, including recreation activities and visitor access.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
		<b>4.3.13 Nature-based Tourism</b>			
122	1	There is no reference to Tourism WA's Regional Destination Development Strategy.	Plan amended. Submission provides additional relevant information.	Y	1a
123	1	The objective and development of Project Eden as tourism 'product' and not just general nature-based tourism is supported.	Plan amended. Submission provides additional relevant information.	Y	1a
124	1	Tourism WA to be added to list of organisations having responsibility to Actions 3 and 4	Plan amended. Submission provides clearer explanation.	Y	1d
125	1	Replace Gascoyne Tourist Association with Australia's Coral Coast.	Plan amended.	Y	1e
126	1	Recommendations of committee reviewing nature-based tourism in WA be included once published.	Plan not amended since review is not available at time of finalising strategic plan.	N	2f
127	1	Sport/active recreation activities associated with nature-based tourism ventures supported but these must be sensitive to the preservation of wildlife, terrestrial and marine environments.	Supports the Plan.	N	2a

Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
128	1	<b>4.3.14 Access</b> Access objective supported and requirements of Destination Development Strategy be added.	Plan not amended. Document is a strategic plan and therefore not meant to provide the specific detail of other documents.	Y	2a
129	1	Pedestrian pathways to be carefully planned and located away from environmentally sensitive areas.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
130	1	Access to be controlled to minimise impacts on the environment.	Supports the Plan.	N	2a
131	1	Strategic plan makes no reference to 'coastal foreshore reserve' or 'public interest' or foreshore management plan, a requirement of any proposed developments or subdivision on or adjacent to the coast, including recreation activities and visitor access.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
132	1	<b>4.3.15 Climate Change</b> Last clause in paragraph 7 to be removed.	Plan amended. Last clause in paragraph 7 deleted.	Y	1a
133	1	Strategic plan makes no reference to 'coastal setback requirements', especially in relation to climate change and development proposals.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
134	1	<b>4.3.16 Mineral Resource Development</b> Strategic Plan does not address impacts from Shark Bay Salt Joint Venture including bitterns discharge and increased dredging.	Plan amended. Submission provides information that more accurately reflects issue. However discussing SBSJV to this level of detail would be part of EPA Development Guidelines not Strategic Plan.	Y	1a
135	1	Paragraph 3 to be changed to better reflect situation.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a

Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
136	1	Implications of SBSJV dredging and discharge of bitterns has on water quality to be documented.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
137	1	<b>4.3.17 Petroleum Resource Development</b> Statement that any proposed petroleum activity within WHP be referred to DEH under EPBC Act to be added.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
138	1	Marine area zonings to be included to provide context to discussion.	Plan amended. Reference to review of Shark Bay Marine Park Plan in near future and zones made.	Y	1a
139	1	Action 1 to be deleted because been completed and Action 2 be amended accordingly.	Plan amended.	Y	1b
140	1	<b>4.3.18 Salt Production</b> Section 4.3.18 to be updated to reflect SBSJV has applied for Special Act Mining Leases 276SA and 280SA for the planned expansion. The additional lease applications are within the WHP.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
141	1	<b>4.3.19 Basic Raw Material Use</b> BRM to be explained in first paragraph.	Plan amended. Submission provides clearer explanation.	Y	1e
142	1	Responsibility for BRM to be clearer and reflect which legislation is being used to mine the resource and therefore changes to Action 1 and 4 are required.	Plan amended. Action statements will be amended accordingly.	Y	1c, 1d
143	1	<b>4.3.20 Fisheries</b> Change department name of DEH.	Plan amended. Submission provides clearer explanation.	Y	1e



Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
144	1	Update information on pearl fisheries.	Plan amended. Relevant section of plan updated with new information from DoF.	Y	1a
145	1	<b>4.3.21 Pastoral use</b> Agreement with all the remaining pastoral leaseholders to be reached before plan will be approved by Commonwealth Minister for the Environment.	WHP already established and acquisition re 2015 process have been signed off and is explicit which lands within SBWHP will be required for public purpose. 2015 process also includes a coastal 400m or 1km excision on Brickhouse, Edagee and Wooramel stations.	N	2b
146	1	Add statement that stock be excluded from grazing the coastal zone.	Plan not amended. Legislation exists to do this and already in Strategic Plan.	N	2c
147	1	Add Heirisson Prong is currently managed by Useless Loop community.	Plan amended. Submission provides additional information.	Y	1a
148	1	<b>4.3.22 Other Resource Use</b> Remove reference to dates in paragraph 4 and revise text.	Plan amended. Submission provides clearer explanation.	Y	1e
149	1	Add statement to Action 1 about EIS required on any horticultural development proposal.	Plan amended. Action 1 needs to make clear statement about EIS being required.	Y	1d
150	1	<b>4.3.24 Resource Use by Aboriginal People</b> Dugong are specially protected because Aboriginal people can "take" them and this needs to be clear in the text.	Plan amended. Submission provides information that better reflects legislative situation.	Y	1c

Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
151	1	Consultation required to identify which Aboriginal communities to liaise with concerning resource use, how much liaison and what liaison will encompass.	Plan not amended. CCC and SAC are supportive of native title claim groups being consulted but this is outside the terms of reference for the WHP committees. Aboriginal people are committee members. More appropriate this issue is addressed by land holders/managers.	N	2c
		<b>4.3.25 Services and Infrastructure</b>			
152	1	World Heritage nomination supported.	Plan not amended. Note, strategic plan not a nomination document, property already exists.	N	2b
153	1	Continued access to Dept of Environment & Conservation lands to maintain existing water assets is required.	Plan not amended. WHP not just DEC managed lands. Some assets located within town of Denham (outside WHP) and jointly vested Monkey Mia Reserve.	N	2b
154	1	Add statement that water conservation, water use efficiency, stormwater management and water reuse is encouraged by Water Corporation.	Plan not amended. Statement more relevant to town of Denham (outside WHP).	N	2b
155	1	Strategic Plan needs to be consistent with provisions in State Coastal Planning Policy and development proposals need to be referred to Coastal Planning & Development Group of DPI.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a, 1e
156	1	Proposed tenure changes will limit Indigenous access and alternatively increase public access to cultural sites.	Plan amended. Plan to clearly state proposed tenure changes likely to result in opposite, i.e. increased protection of cultural sites and restricted public access.	Y	1e
157	1	Assessment of development proposals to include 'State coastal planning policy' and 'Country coastal planning policy' requirements.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a

Comment No.	No. of Subs	Summary of Comment	Discussion / Action Taken	Plan Amended	Criteria
158	1	Add information about the Country Coastal Planning policy considers drainage patterns, nearshore sediment transport patterns, water quality, marine habitat, nesting or breeding fauna, visual amenity when assessing development proposals.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
159	1	Strategic plan makes no reference to 'coastal setback requirements', especially in relation to climate change and development proposals.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
160	1	Strategic plan makes no reference to 'coastal foreshore reserve' or 'public interest' or 'foreshore management plan', a requirement of any proposed developments or subdivision on or adjacent to the coast, including recreation activities and visitor access.	Plan amended. Submission provides information that more accurately reflects issue.	Y	1a
161	1	<b>4.4 Goal, Objectives, Strategies and Actions for Presentation</b> WAM to be included in list of organisations having responsibility for implementing Actions in section 4.4.	Plan amended	Y	1e
162	1	<b>4.4.1 Information, Interpretation and Education</b> Update information such as Visitor Centre name and WHP logo.	Plan amended. Submission provides clearer explanation.	Y	1e
163	1	<b>4.4.2 Social Research</b> Review the need to use out-dated information and its relevance to WH	Plan amended. Submission provides clearer explanation.	Y	1e
164	1	Report by Richards (2000) also provides information on perceptions by local community on world heritage values.	Plan not amended. Reports by Chapman are more comprehensive than Richards report.	N	2a
165	1	<b>4.5 Goal, Objectives, Strategies and Actions for Rehabilitation</b> Amend wording of Action 1 to include "... and maintain ...".	Plan amended.	Y	1d

<b>Comment No.</b>	<b>No. of Subs</b>	<b>Summary of Comment</b>	<b>Discussion / Action Taken</b>	<b>Plan Amended</b>	<b>Criteria</b>
166	1	Action items 3, 4 and 5 identify DOIR as primary agency responsible but this needs to change to reflect a shared responsibility and is dependent on what legislation was used to create the rehabilitation.	Plan amended. Action statements will be amended accordingly.	Y	1d
167	1	<b>6. BIBLIOGRAPHY</b> The Bibliography lacks many research outcomes.	Plan not amended. Strategic Plan does not need to be this specific.	N	2c
168	1	<b>7. APPENDICES</b> Change explanation of EPBC Act required.	Plan amended. Submission provides clearer explanation.	Y	1e

## **APPENDIX 1: LIST OF SUBMITTERS TO THE DRAFT STRATEGIC PLAN**

### Individuals

Mr Alex Wyatt  
The Honourable Senator Ian Campbell  
Ms Julie Hoey  
Mr Jeff Short

### Community Organisations

Australian Wildlife Conservancy  
National Trust of Australia (Western Australia)  
Yamatji Aboriginal Land and Sea Council

### Government Agencies

Conservation Commission of Western Australia  
Gascoyne Development Commission  
Department for Planning and Infrastructure – Maritime  
Department for Planning and Infrastructure – Coastal Planning  
Department of Environment and Conservation – Species & Communities Branch  
Department of Environment and Conservation – Parks & Visitor Services Policy  
Department of Environment and Heritage (now Environment and water Resources)  
Department of Indigenous Affairs  
Department of Industry and Resources  
Department of Sport and Recreation  
Department of Water  
Tourism WA  
Water Corporation  
WA Museum

In addition, in preparing the draft strategic plan before it was made available for public comment, information was received from the following organisations:

- Department for Planning and Infrastructure
- Department of Agriculture
- Department of Environment
- Department for Local Government and Regional Development
- Environmental Protection Authority
- Marine Parks and Reserves Authority
- Shire of Shark Bay
- Tourism Western Australia
- Western Australian Museum