

BARROW GROUP NATURE RESERVES

Analysis of Public Submissions

to the

Draft Management Plan 2011

Department of Parks and Wildlife

for the

Conservation Commission of Western Australia

1. OVERVIEW

This document is an analysis of public submissions (APS) to the *Barrow Group Nature Reserves Draft Management Plan* (the draft plan) (DEC 2011). It informs the final management plan, and shows how the draft plan has been amended to reflect submissions received, as assessed by the criteria below.

The draft plan was released for public comment by the Conservation Commission of Western Australia from the 12 August 2011 to 28 October 2011¹. A notice of the draft plan's release was published in the *Government Gazette* on the 16 August 2011.

Advertisements indicating that the draft plan was available for comment were placed in *The West Australian* newspaper and in local newspapers. The draft plan was distributed to key stakeholders including relevant state government departments, conservation groups, local government authorities, libraries, and other community groups and individuals who expressed interest during the preparation of the draft plan. The draft plan was available from the Department of Parks and Wildlife's (the department) website and submissions could be made online. Printed copies of the draft plan were available at the department's Crawley and Karratha offices. The draft plan could be inspected at the department's Kensington and Atrium libraries.

A total of 12 submissions were received and all comments were considered during the APS. Key changes have been made to the final management plan where appropriate.

2. METHODOLOGY

Each comment on the draft plan was analysed and assessed using the following criteria:

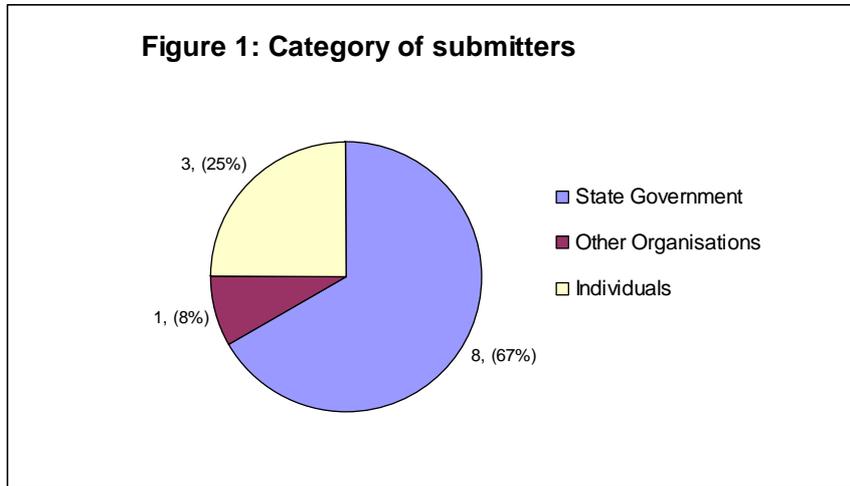
1. The draft management plan *was amended* if the comment:
 - provided additional information of direct relevance to management
 - provided additional information on affected user groups of direct relevance to management
 - indicated a change in (or clarified) Government legislation, management commitment or management policy
 - proposed strategies that would better achieve management objectives, or
 - indicated omissions, inaccuracies or a lack of clarity.
2. The draft management plan *was not amended* if the comment:
 - clearly supported proposals in the plan
 - made general statements and no change was sought
 - made statements already in the plan or which were considered during the plan preparation
 - addressed issues beyond the scope of the plan
 - was one among several widely divergent viewpoints received on the topic but the outcome or action in the plan was still considered the preferred option
 - contributed options that are not feasible (generally due to conflict with existing legislation, Government policy, lack of resource capacity or lack of research knowledge to make decisions)
 - was based on unclear, factually incorrect information, or
 - provided details that are not appropriate or necessary for inclusion in a document aimed at providing management direction over the long term.

Comments made in submissions were 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 that would give cause to elevate the importance of any submission above another.

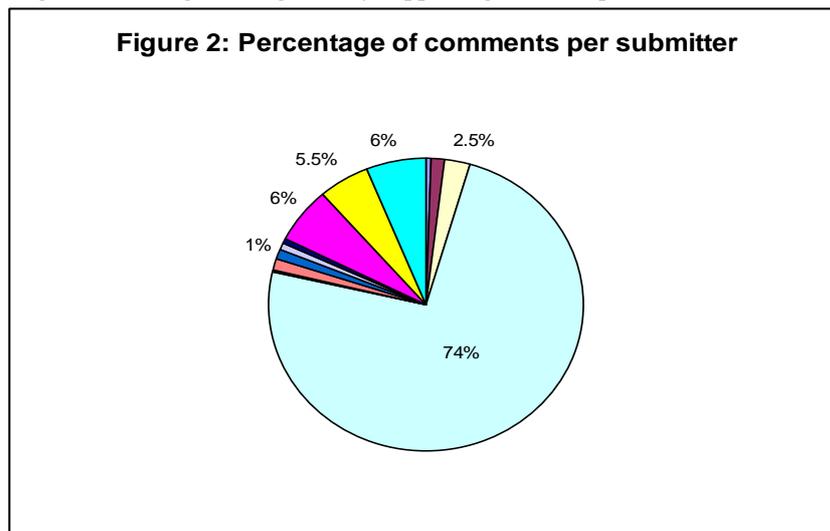
¹ Late submissions were accepted

3. ABOUT THE SUBMITTERS

Twelve submissions were received on the draft plan. Figure 1 shows the breakdown of submitters by category. Most submissions (67% or 8 submissions) came from state government agencies, 25% (3 submissions) came from individuals and 8% (1 submission) came from other organisations.

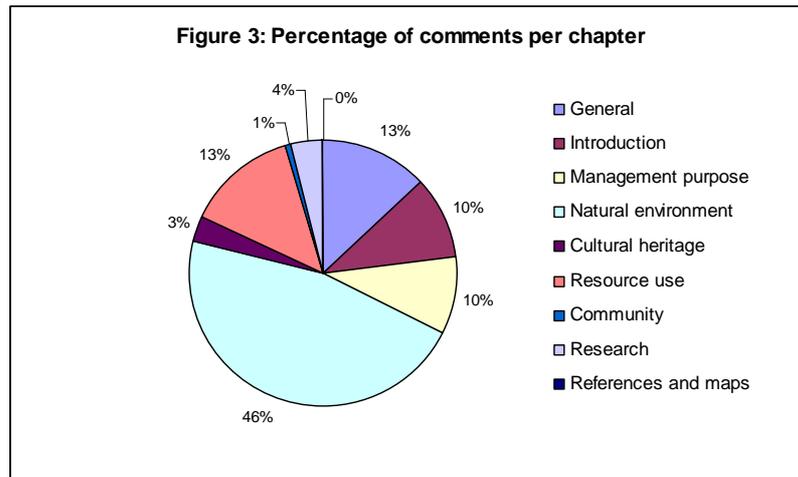


From the 12 submissions received on the draft plan, 200 different comments were made. Figure 2 shows the breakdown of how many comments each submitter provided. One commenter submitted 74% of the overall comments and three other submitters each submitted 6% of the comments. The least amount of comments came from the eight State government agencies, generally supporting the draft plan.



4. KEY ISSUES AND THEMES

Figure 3 shows the breakdown of comments by chapter in the draft plan.



A large proportion of comments (46%) were regarding the Managing the Natural Environment section, which is to be expected given the area's ecological importance. About 12% of the comments provided valuable up to date information that has become publically available since the printing of the draft plan which were incorporated into the plan. A number of comments were editorial.

The key issues and themes raised by submitters and how the submissions were considered when amending the plan are depicted below.

Key Performance Indicators (KPIs) and management actions

A significant portion (31%) of the comments made by four separate submitters related to the KPIs and management actions. There were many conflicting views and suggestions for changes to the actions and KPIs. Many management actions and KPIs were supported. Some questioned measurability and achievability. There was concern from two submitters that the draft plan calls for duplicating existing data collection and reporting that already occurs under current Ministerial conditions and legislative requirements for industry operators. A number of comments stated that the management actions were not specific enough. A number of submitters believe that the management actions were too focused upon collaborating with industry and should be more independent. One submitter stated that monitoring and reporting needs to be replaced with actions and targets with details on specific timeframes.

All of the draft plan management actions and KPIs have been reviewed and as a result the majority of management actions and KPIs were modified, with many being deleted. Environmental management by the department is unique on Barrow Island Nature Reserve, with effective management occurring with industry operators and other stakeholders. The amended management actions and KPIs took into consideration the existing requirements for industry that are already in place and how the department and industry can collaborate effectively within these existing requirements. The KPIs were amended to reflect what is measurable and achievable with the resources the department has available for use in the planning area. No changes were made when comments requested detail that is not relevant to a strategic document or when calling for actions that are dependent on external factors and beyond departmental control. KPIs were not developed for all sections as the purpose is to provide KPIs for key issues in the plan.

Consistency in content

Two submitters raised a number of comments regarding the consistency of content. The plan contained minor inconsistencies with key values of the planning area. It was also noted a significant amount of information was included on marine turtles but not on the other threatened species. This has since been rectified so that the plan deals more equally with the range of threatened species present in the planning area.

Non-indigenous and other problem species

This section was updated as a number of comments queried the accuracy of information and also requested further information on existing processes. Further information was incorporated into the draft plan as the Quarantine Management System (QMS) applies to the department as well as industry operators.

Waste disposal, contamination and pollution

Two submitters commented on this section. Information was provided by submitters about waste, contamination and pollution that was either unknown when the management plan was drafted or has since changed. This information has been noted, but much of the information provided, which includes location of waste and contaminated sites is too detailed for the level of this management plan and can be dealt with in subsidiary documents or under existing legislation.

Workforce recreation and accommodation

Three submitters commented on workforce recreation. One submitter wished to see spotlighting and a turtle tagging program started up again. Conversely, another submitter was against spot-lighting on or near turtle nesting beaches during nesting season. The intent of the draft plan was to discuss spotlighting in a terrestrial context, not for marine turtles. Clarification on the permitted level of workforce recreation was also requested.

The management plan was amended to clarify the permitted level of workforce recreation, particularly in high conservation value areas. The term ‘spot-lighting’ has been removed to avoid confusion.

Further detail to be presented in the plan

Some comments were received requesting that more information be presented in the plan. As this plan is a strategic document that will guide management direction on the nature reserves by the department over the next 10 years, it is not appropriate for the requested detail to be in the plan. The draft plan was, however, amended to clarify some issues which include planning boundaries, relevance to other management plans and relevance to existing industry operators on Barrow Island. The draft plan was also amended to guide readers to where they could find further information if they required it. This included reference made to industry approved environmental management documents and Ministerial conditions that relate to the planning area (*section Further Reading*), the department’s website and other references that provide more information on the values and threats to the nature reserves (*section References*). As many of these lists change regularly, the most recent information, rather than lists that are only accurate at the time of printing should remain available throughout the life of the plan.

A glossary and acronyms tables has also been added to the management plan. Specific details of day-to-day management of the reserves will be developed by the department in subsidiary operational plans, which will be guided by the management objectives and actions of the final management plan.

5. REFERENCES

DEC (2011) *Barrow Group Nature Reserves draft management plan*. Department of Environment and Conservation