

ANALYSIS OF PUBLIC SUBMISSIONS TO THE INDICATIVE MANAGEMENT PLAN FOR THE PROPOSED JURIEN BAY MARINE PARK

April 2005



Department of Conservation and Land Management
For the
Marine Parks and Reserves Authority

TABLE OF CONTENTS

TABLE OF CONTENTS.....I
LIST OF TABLESI
INTRODUCTION..... 1
METHODS 1
RESULTS OF ANALYSIS OF SUBMISSIONS 2
APPENDIX 1: SUBMITTERS TO THE INDICATIVE MANAGEMENT PLAN 31

* * *

LIST OF TABLES

TABLE 1: NUMBER AND ORIGIN OF SUBMISSIONS..... 2
TABLE 2: ANALYSIS TABLE FOR PUBLIC SUBMISSIONS 3

* * *

INTRODUCTION

In accordance with the *Conservation and Land Management Act* 1984, a Notice of Intent (NOI) was released in October 2000 for a proposal to create a marine park in the Jurien Bay area. The NOI included the release of an indicative management plan, which outlined the proposed management of the area for the next ten years. The indicative management plan was released for the statutory three month public submission period. At this time, advertisements were placed in two editions of local and Statewide newspapers to advise that the indicative management plan was available for comment. A notice of intent was also placed in the *Government Gazette*. The indicative management plan was distributed to State and local government departments, tertiary institutions, libraries, stakeholder groups and numerous individuals who expressed interest during the planning process. An electronic copy of the indicative management plan was also available on the Department of Conservation and Land Management's (CALM) NatureBase website that allowed submissions to be lodged electronically. Copies of the indicative management plan were available for perusal at CALM and local government offices including CALM's State Operations Headquarters and CALM's offices at Cervantes, Moora, Geraldton and Fremantle. A brochure was also produced which summarised the major objectives and strategies outlined in the indicative management plan, and included a postage-paid tear-off questionnaire to facilitate public input. Open days were conducted in Cervantes, Jurien, Green Head and Leeman during the public submission period, and talks were given to a number of groups to encourage and facilitate submissions to the indicative management plan.

The community consultation period closed on 5 January 2001. A total of 81 public submissions (32 written, 45 proforma and 4 electronic) to the indicative management plan for the proposed Jurien Bay Marine Park were received. All submissions were summarised by CALM and were then considered by the Marine Parks and Reserves Authority (MPRA). The MPRA provided its advice to the Minister for the Environment. The Jurien Bay Marine Park was gazetted on 26 August 2003. This document provides an analysis of public submissions categorised according to the indicative management plan section to which the comments apply and advice as to whether changes were made by the Minister for the Environment as a result of the submissions.

METHODS

The public submissions to the indicative management plan for the proposed Jurien Bay Marine Park were analysed according to the process outlined below.

- All comments were summarised and collated according to the section of the indicative management plan they addressed.
- Each comment was assessed using the following criteria.
 1. The indicative management plan **was amended** if a submission:
 - 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 management objectives and aims; or
 - e) indicated omissions, inaccuracies or a lack of clarity.
 2. The indicative management plan **was not amended** if the submission:
 - a) clearly supported the draft proposals;
 - b) offered a neutral statement or no change was sought;
 - c) addressed issues beyond the scope of the indicative management plan;
 - d) made points that were already in the indicative management plan or were considered during its preparation;

- e) was one amongst several widely divergent viewpoints received on the topic and the strategy of the indicative management plan was still considered the best option; or
 - f) contributed options which are not possible (generally due to some aspect of existing legislation or Government policy).
- The reasons why recommendations in the indicative management plan were, or were not changed and the relevant criteria used are discussed with each comment.
 - Minor editorial changes (e.g. spelling mistakes, grammar and formatting) referred to in the submissions have also been made to the final management plan.
 - Comments made in the submissions were assessed entirely on the cogency of points raised. No subjective weighting was 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.
 - All submissions have been filed on the CALM corporate files.

RESULTS OF ANALYSIS OF SUBMISSIONS

A total of 81 public submissions were received, comprising: 32 written, 45 proforma and 4 electronic. A list of the submitters to the indicative management plan is presented in Appendix I. The majority (73%) of the submissions were received from individuals (Table 1).

Table 1: Number and origin of submissions

	Number of submissions	Percentage (%)
Individuals	59	73
Real Estate Developer	1	1
Community groups/representative bodies	12	15
Government (Local)	2	2
Government (State)	7	9
TOTAL	81	100

The analysis of public submissions to the indicative management plan is presented in Table 2

The table contains:

- a summary of each comment and the number of submissions that each comment appeared in;
- an indication whether or not the comment resulted in an amendment to the final management plan and the criteria by which each comment was assessed;
- a discussion on why the comment did not result in an amendment to the final management plan, or an indication of what action was taken in the final management plan; and

Table 2: Analysis table for public submissions

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
		<u>GENERAL COMMENTS</u>			
1	2	Commends the layout of the management plan.	Support for the plan.	No	2a
2	2	Supports the proposed marine park.	Support for the plan.	No	2a
3	4	Supports CALM in its efforts during the consultation process and supports the proposed marine park.	Support for the planning process and the plan.	No	2a
4	1	The plan has resisted the temptation to discriminate against classes of people simply on the basis of occupation.	Support for the planning process.	No	2a
5	2	Local community consultation is not likely to fully represent the broader interests of stakeholders from adjacent and metropolitan areas.	The views of the local community were an important consideration in the planning process however the views of the broader community were considered.	No	2d
6	2	CALM has failed to fulfill its responsibilities to develop a management plan consistent with meeting the conservation objectives of the park. Better strategies suggested.	The strategy of the plan is still considered the best option.	No	2e
7	1	Objectives lack clear, examinable outcomes, with no means for future managers to measure success.	Performance measures and targets are the basis for measurement of management success. These are supported by an audit process to assess management success.	No	2e
8	2	Input of recreational fishing groups has failed to directly impact on the committee's deliberations.	The views of recreational fishers have impacted on the proposal.	No	2e
9	1	Management plan should clearly state at the start of the document the vested interests of the community-based advisory	Affiliations of the committee members are included	No	2d

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
10	1	committee members. A longer time period is required to fully canvass members of interest groups prior to the submission period.	in the Acknowledgements. Comment relates to the planning process. There was extensive consultation. The process to develop the indicative management plan took three years. This was prior to the statutory three month public submission period.	No	2c
11	1	Central West Coast bioregion needs a number of relatively small no-take reserves throughout the fisheries.	Support for the plan.	No	2a
12	1	Propose that CALM embarks (with unilateral government support) on a major concerted program to create multi-purpose marine reserves across the State.	Addresses issues beyond the scope of the plan.	No	2c
13	1	<u>EXECUTIVE SUMMARY AND INTRODUCTION</u> Lack of clarity pg. 1 Introduction. Amendment proposed to second last paragraph.	Text amended.	Yes	1e
14	1	Inconsistency with reserve categories on pg. vii regarding the options for reserve categories - Special Purpose (Scientific Reference) zones should be Marine Nature Reserves.	The purpose of Special Purpose (Scientific Reference) zones and Marine Nature Reserves are different.	No	2e
15	1	Inaccuracy on pg. vii regarding the development of the plan. This needs to be amended to state that only a subset of the committee developed and agreed to the plan. <u>VISION AND STRATEGIC OBJECTIVES</u>	The indicative management plan as recommended to the Minister for the Environment was supported by the majority of the Advisory Committee.	No	2e

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
16	38	<u>Vision</u> Vision statement for the proposed park is supported.	Support for the plan.	No	2a
17	13	Vision statement is not supported.	The vision statement in the plan is still considered the best option.	No	2e
18	1	Vision statement is not achievable.	The vision statement in the plan is still considered the best option.	No	2e
19	1	Proposed change to vision statement.	The vision statement in the plan is still considered the best option.	No	2e
20	1	Vision statement reflects a lack of understanding or commitment to the purpose of Marine Protected Areas.	The vision statement in the plan is still considered the best option.	No	2e
21	34	<u>Strategic Objectives</u> Strategic objectives are supported.	Support for the plan.	No	2a
22	13	Strategic objectives are not supported.	The strategic objectives in the plan are still considered the best option.	No	2e
23	1	There is no guarantee of achieving the objectives due to the nature of the marine environment.	Management objectives and strategies have been developed specifically for the marine environment and promote integrated management with surrounding waters.	No	2d
24	2	Propose wording change for marine park objective 2(f) - Target fish species in the park are to be harvested for sustainable levels as stated in the 'Have your say' brochure.	The objective in the plan is still considered the best option.	No	2e

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
25	1	No criteria for measurement of objectives 1, 2(a) and 2(f) as stated in the 'Have your say' brochure.	Targets for the ecological and social values provide the basis for assessing the achievement of strategic objectives.	No	2d
26	1	Inconsistency with strategies for the National Reserve System of Marine Protected Areas (commercial fishing within the Commonwealth waters of Ningaloo Marine Park and Jurien Bay Marine Park).	The management of each marine protected area should be dependent upon the values, usage patterns and potential impacts, which characterize the area. The issues/values of Jurien Bay are very different to Commonwealth component of the Ningaloo Marine Park.	No	2e
27	2	It is questionable whether the details of the plan will meet the stated objectives. <u>DEFINITION OF THE AREA</u>	The management approach is still considered to be the best option to meet the stated objectives	No	2e
28	1	Oppose incorporating the adjacent strips of coastal crown land with the marine park. <u>ECOLOGICAL AND SOCIAL VALUES</u>	Coastal management is an integral part of marine management and therefore should be managed in an integrated manner where possible.	No	2d
29	1	The summary of the social values states: 'a historical link with indigenous cultures', however there is nothing in the text of section 4 to support this statement.	More detail is provided in section 7 of the plan.	No	2d
30	1	There is an omission of ecosystem structure and function as key ecological values.	Ecosystem structure and function is an inherent value that has been represented by breaking this into more detailed ecological values.	No	2d

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
31	1	Inconsistent process for development of the management for ecological and social values. Amendment is suggested.	The process for development if the management of ecological and social values of the plan is still considered the best option.	No	2e
32	1	If stock depletion is an issue, catch limits should be reviewed rather than restricting access. <u>MANAGEMENT FRAMEWORKS</u> <u>INTERNATIONAL AND NATIONAL CONTEXT</u> <u>STATE POLICY CONTEXT</u> <u>LEGISLATIVE FRAMEWORK</u>	Sanctuary zones are established primarily for biodiversity conservation. The management of fish stocks is the responsibility of the Department of Fisheries.	No	2d
33	1	Makes no reference to the <i>Aboriginal Heritage Act 1972</i> (AHA) even though it is listed under legislation in section 12 pg. 73. <u>RESPONSIBILITIES OF AUTHORITIES & GOVERNMENT AGENCIES</u>	Minor amendment to plan.	Yes	1e
34	1	Table on pg. 13 should be amended to include the Department for Planning and Infrastructure's management role in vessel navigation and in the development and management of support	Minor amendment to plan.	Yes	1e

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
		facilities.			
		<u>DESCRIPTION OF MANAGEMENT ISSUES</u>			
		<u>MANAGEMENT OF ECOLOGICAL AND SOCIAL VALUES</u>			
		<u>Ecological Values</u>			
		<u>Geomorphology</u>			
35	38	Agree that the geological features such as seabed, shoreline, reefs and beaches, not be significantly altered as a result of human activities.	Support for the plan.	No	2a
36	1	Disagree that the geological features such as seabed, shoreline, reefs and beaches, not be significantly altered as a result of human activities.	The objective in the plan is still considered the best option.	No	2e
37	2	Support the objective 7.1.1; however cannot support the objective if it is used to completely exclude access to specific areas (if there are other ways for protection.).	Support for the plan. Access is not prohibited in any area of the park.	No	2a
		<u>Intertidal reef platforms</u>			
38	2	The words 'significantly impacted' need to be better defined. Concern that any visible impact may be considered significant and lead to unnecessary restrictions.	Support for the plan. The plan includes research and monitoring strategies to characterize what is "natural" and then to determine what a "significant" impact is to intertidal reef platforms.	No	2d
39	1	Support objective, however it should not result in significant loss in access for reasonable and sustainable recreational	Support for the plan.	No	2a

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
40	1	activities. Monitoring of the intertidal reef platform and nature reserves need to be integrated.	This is addressed in the plan.	No	2d
41	1	Review boundaries of zones e.g. Boullanger Island Special Purpose zone, what is Nature Reserve and what is Special Purpose zone?	Minor amendment to plan to specify and clarify low water mark and high water mark boundaries.	Yes	1e
42	1	Marine life collected from the reef should be controlled by bag limits and closed seasons.	Department of Fisheries has the statutory responsibility for management of fisheries	No	2c
43	1	Current Pressure (2) - physical disturbance by trampling is not an issue, as reefs in the area are not easily damaged.	Fauna on reefs is susceptible to trampling.	No	2e
44	1	Performance measures are inappropriate to assess human impact.	Performance measures in the plan are still considered to be the best option however these can be amended during the life of the plan should a more appropriate measure be identified.	No	2e
45	1	Baseline data needs to be collected within a shorter time frame than 3 years. <u>Water quality</u>	Collection of accurate baseline data is not feasible within a time frame of less than 3 years because of natural variability.	No	2e
46	37	Agree that quality of seawater throughout the park should meet human health standards at all times for swimming and other water sports.	Support for the plan.	No	2a
47	1	Disagree that quality of seawater throughout the park should meet human health standards at all times for swimming and other water sports.	The targets in the plan are still considered the best option.	No	2e

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
48	38	Agree that quality of seawater should be maintained at all times to ensure seafood from the park meets human health standards.	Support for the plan.	No	2a
49	1	Disagree that quality of seawater should be maintained at all times to ensure seafood from the park meets human health standards.	The targets in the plan are still considered the best option.	No	2e
50	2	Support for management objective.	Support for the plan.	No	2a
51	1	Water quality should exceed human standards at all times.	Support for the plan.	No	2a
52	1	Commitment to developing a wastewater facility and disposal technique that has minimal effect on water quality.	Outside the scope of this plan.	No	2c
53	1	No explanation of why the seaward boundary of no discharge is not at the park boundary (Fig 4).	Minor amendment to text of the plan.	Yes	1e
54	1	Recommends using bio-indicator for performance measures of water quality. Seagrass meadows	Plan recommends using chlorophyll <i>a</i> , which is a bio-indicator.	No	2d
55	2	Support for management objective.	Support for the plan.	No	2a
56	37	Agree that there should be no permanent loss of seagrass as a result of human activities.	Support for the plan.	No	2a
57	2	Disagree that there should be no permanent loss of seagrass as a result of human activities. This could prevent the building of a new marina.	The strategy of the plan is still considered the best option.	No	2e
58	1	A strategy to assess the effects of nutrient enrichment should	Specified in 7.1.3 Water Quality.	No	2d

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
59	1	be included. Recommends that the performance measures are not appropriate for assessing any impact of nutrients.	Nutrients are not considered a significant threat to the seagrass meadows in the park.	No	2d
60	1	Aboveground biomass as a performance measure for seagrass is not practical over the whole park.	Seagrass KPI's relate to specific areas where there is an identified threat to the values. Monitoring for KPI's will generally focus on small parts of the reserve - not over the whole park.	No	2e
61	2	<u>Macroalgal communities</u> Support for management objective.	Support for the plan.	No	2a
62	1	Recommends that performance measures need to be reviewed.	Performance measures in the plan are still considered to be the best option however these can be amended during the life of the plan should a more appropriate measure be identified.	No	2e
63	2	Use of sea wrack (tool for rehabilitation) should be noted as a potential impact. <u>Seabirds</u>	Considered in the plan.	No	2d
64	2	Supports the strategies of educating park users about seabird populations.	Support for the plan.	No	2a
65	1	Recommends that performance measures need to be reviewed, e.g. the annual accumulation of shellfish remains in the nest territories of pacific gulls may provide a simple and efficient way of monitoring changes.	Performance measures in the plan are still considered to be the best option however these can be amended during the life of the plan should a more appropriate measure be identified.	No	2e

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
66	2	<u>Invertebrate communities</u> Support for management objective.	Support for the plan.	No	2a
67	34	Agree that the diversity and abundance of animals that are not harvested is to be maintained at, or increased above current levels.	Support for the plan.	No	2a
68	3	Disagree that the diversity and abundance of animals that are not harvested is to be maintained at, or increased above current levels.	The strategy of the plan is still considered the best option.	No	2e
69	1	Recommends that performance measures need to be reviewed. For example, same simplistic assumptions about trends in diversity and abundance relative to disturbance apply to the invertebrate's conservation performance measures.	Performance measures in the plan are still considered to be the best option however these can be amended during the life of the plan should a more appropriate measure be identified.	No	2e
70	1	No mention of infauna and cryptic species.	Section incorporates all invertebrates.	No	2d
71	1	No mention of sand dwelling and burrowing animals in the lagoons and bays.	These invertebrate communities are broadly considered in the invertebrates section of the plan	No	2d
72	34	<u>Finfish</u> Agree that the diversity and abundance of animals that are not harvested is to be maintained at, or increased above current levels.	Support for the plan.	No	2a
73	3	Disagree that the diversity and abundance of animals that are not harvested is to be maintained at, or increased above current levels.	The strategy of the plan is still considered the best option.	No	2e

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
74	1	Game fishers do not target any species listed in table.	The table lists the most abundant fish species in the park, not the targeted fish species.	No	2d
75	2	The control of target species should be included under sections 7.2.3 and 7.2.7.	This is included in these sections.	No	2d
76	1	Support for reduction in commercial fishing by-catch and ethical methods and restraint in recreational fishing.	Support for the plan.	No	2a
77	1	Recommends that performance measures need to be reviewed.	Performance measures in the plan are still considered to be the best option however these can be amended during the life of the plan should a more appropriate measure be identified.	No	2e
78	2	<u>Sea-lions</u> Support for management objectives.	Support for the plan.	No	2a
79	38	Agree that there should be no decline in sea lion breeding success in the park resulting from human activities.	Support for the plan.	No	2a
80	1	Disagree that there should be no decline in sea lion breeding success in the park resulting from human activities.	The strategy of the plan is still considered the best option.	No	2e
81	1	Recommends that performance measures need to be reviewed. The proposed target measure for the sea lion is not a good key performance indicator.	Performance measures in the plan are still considered to be the best option however these can be amended during the life of the plan should a more appropriate measure be identified.	No	2e
82	2	<u>Cetaceans and turtles</u> Support for management objective.	Support for the plan.	No	2a

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
83	1	It is assumed that by the term common dolphin the author means inshore bottle-nosed dolphin. Common dolphins are smaller pelagic species. <u>Social Values</u>	Text of the plan amended.	Yes	1e
84	33	Agree that the proposed marine park allow for and manage a wide range of recreational and commercial activities.	Support for the plan.	No	2a
85	6	Disagree that the proposed marine park allows for and manages a wide range of recreational and commercial activities.	The strategy of the plan is still considered the best option.	No	2e
86	38	Agree that the proposed marine park should manage human activities in an equitable and sustainable way.	Support for the plan.	No	2a
87	3	Disagree that the proposed marine park should manage human activities in an equitable and sustainable way.	The strategy of the plan is still considered the best option.	No	2e
88	38	Agree that the proposed marine park should be promoted for education, nature appreciation and scientific research.	Support for the plan.	No	2a
89	3	Disagree that the proposed marine park should be promoted for education, nature appreciation and scientific research.	The strategy of the plan is still considered the best option.	No	2e
90	1	<u>Indigenous heritage</u> The plan states that no comprehensive study has been carried out and the largest midden deposits etc. found between Green Head and Jurien Bay. These statements are contradictory with no references. The significance of the marine environment with respect to this value has not been established.	36 sites are regarded as significant within the South West of W.A. Reference is made in text. There is no available information regarding the significance of the marine environment with respect to this value.	No	2d

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
91	1	High priority for the indigenous heritage strategy 2 (pg. 35) is recommended.	Minor amendment to plan.	Yes	1d
92	1	Support for indigenous representation. <u>Maritime heritage</u>	Support for the plan.	No	2a
93	1	Support for objective.	Support for the plan.	No	2a
94	1	“First Jetty” at Cervantes is listed as a local cultural heritage site. <u>Commercial fishing</u>	Minor amendment to plan.	Yes	1a
95	2	Supports management objectives.	Support for the plan.	No	2a
96	39	Agree that target fish species in the park are to be harvested at sustainable levels.	Support for the plan.	No	2a
97	1	Sanctuary zones may contain commercial abalone fishing spots and there will subsequently be compensation difficulties.	If the establishment of a marine nature reserve or exclusion zone in a marine park diminishes the commercial value of an authorisation, then the authorisation holder may apply for compensation (under the <i>Fishing and Related Industries Compensation (Marine Reserves) Act 1997</i>). Addressed in section 5.3.	No	2d
98	2	By-catch and reef damage caused by the rock lobster fishing are significant (reference to Special Purpose (Scientific Reference) zones).	Whilst it is generally believed that these impacts are not significant, a risk assessment process in conjunction with the Marine Stewardship Council is underway to further consider the significance of	No	2d

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
99	2	All commercial craypots should be fitted with a device to prevent the entry of sea lion pups and large demersal fish.	these impacts. Research projects to quantify these impacts will also be undertaken in the near future. Addressed in Section 7.1.9, Strategy 4.	No	2d
100	3	Inaccuracy in the document on pg. 37, paragraph 2. MSC process does not demonstrate the WRL fishery is ecologically sustainable.	Minor amendment to plan.	Yes	1e
101	5	Ban net fishing.	Department of Fisheries has the statutory responsibility for fisheries management in the State. They did not support such an approach in the park.	No	2c
102	1	Proposal does not support the holistic approach to fisheries management.	This plan promotes integrated management of the marine environment. Department of Fisheries has the statutory responsibility for fisheries management in the State.	No	2d
103	3	Aquaculture Support for management objectives.	Support for the plan.	No	2a
104	1	Bottom of paragraph 2 should change the order of CALM and the Department of the Environment to maintain the consistency with strategy 5.	Minor amendment to plan.	Yes	1e
105	1	Aquaculture is not an acceptable industry operating within or adjacent to the proposed marine park.	If managed and sited appropriately, aquaculture can be an acceptable activity in or adjacent to the park. Permitting appropriate aquaculture activity in the park is in line with the Government's multiple use policy and each proposal is assessed to determine whether it is compatible with the park.	No	2d

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
106	1	<u>Coastal use</u> 3 rd paragraph 2 nd sentence should also add that RV's could cause disruption to ecological values. RV's have particular impact on nesting shorebirds, in particular where the park extends to high water mark. Strategies suggested.	Amendment to plan.	Yes	1a
107	2	Coastal access should not be restricted as a result of a small number of irresponsible users and education and enforcement should be used to control these impacts.	Support for the plan	No	2a
108	2	<u>Seascapes</u> Support for management objectives.	Support for the plan.	No	2a
109	2	<u>Recreational fishing</u> Support for management objectives.	Support for the plan.	No	2a
110	39	Agree that target fish species in the park are to be harvested at suitable levels.	Support for the plan.	No	2a
111	1	Catch per unit effort data is very limited for WA recreational fisheries and monitoring surveys are necessary.	No change made to the plan.	No	2b
112	1	No reference has been made to the Government's Integrated Fisheries Management Plan. Propose a reference to it in the plan.	Beyond the scope of the plan.	No	2c
113	5	Ban net fishing.	Department of Fisheries has statutory responsibility for fisheries management throughout the State. They did not support this approach in the park.	No	2d

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
114	1	Ban fishing competitions in marine parks.	Department of Fisheries has statutory responsibility for fisheries management throughout the State. They did not support this approach in the park.	No	2d
115	1	Recreational fishing should have uniform regulations throughout the state.	Beyond the scope of the plan. Department of Fisheries has statutory responsibility for fisheries management throughout the State.	No	2c
116	1	Proposal does not support the holistic approach to fisheries management.	The plan promotes integration of management of the marine environment. Department of Fisheries has statutory responsibility for fisheries management throughout the State	No	2d
117	2	Water sports Support for objectives.	Support for the plan.	No	2a
118	2	Recommends the exclusion of powered water sports from sanctuary zones.	Water sports are not excluded from sanctuary zones.	No	2d
119	1	Marine nature-based tourism Recommend monitoring of potential increased impact on marine environment that may be caused by an increase in tourism.	Addressed in the plan in each ecological value and in the generic monitoring section (Section 8.5).	No	2d
120	1	The promotion of tourism may result in an impact on the native vegetation. This includes the rare plant <i>Adriana quadripartita</i> , which is the larval food of the rare coastal butterfly <i>Theclinesithes Hesperia</i> .	Outside scope of plan.	No	2c
121	2	General support for management objectives.	Support for the plan.	No	2a

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
122	3	<u>Petroleum drilling and mineral development</u> Most stringent examination, precautions and penalties should be applied to proposals within the park.	Any proposal for petroleum activities would be assessed in accordance with the Environmental Protection Act 1986 and in light of the targets and objectives in the management plan.	No	2d
123	2	<u>Scientific research</u> Support for objectives.	Support for the plan.	No	2a
124	1	Research should be for the benefit of commercial and recreational sectors.	Research should provide information necessary to facilitate effective management of the park. This information will be available for use by the recreational and commercial sectors.	No	2b
125	1	Additional scientific measure required, additional performance measure suggested.	Performance measures in the plan are still considered to be the best option however these can be amended during the life of the plan should a more appropriate measure be identified.	No	2d
126	2	<u>Education</u> Support for management objectives.	Support for the plan.	No	2a
127	1	Support for strategies (e.g. 4).	Support for the plan.	No	2a
128	1	<u>GENERIC MANAGEMENT STRATEGIES</u> Difficult to determine which strategies are planned within certain timeframes.	Timeframes for implementation are shown in appendix 2.	No	2d

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
129	1	Proposed sixth generic management strategy (i.e. Memorandum of Understanding).	MOU's are covered under appropriate administrative framework.	No	2d
130	1	Management strategies unable to meet specific conservation, scientific and research objectives. <u>Development of an Administrative Framework</u>	The management strategies of the plan are still considered the best option.	No	2d
131	1	Concerned that funding for the park will come from 'new' monies generated by recreational access fees, specific mooring fees or boat ramp fees.	The Government has allocated additional funding to CALM and Department of Fisheries to implement the management plan.	No	2c
132	1	Recreational fishing compliance costs should not come from the Department of Fisheries recreational fishing budget.	The Government has allocated additional funding to CALM and Department of Fisheries to implement the management plan.	No	2c
133	1	Enforcement of Sanctuary zones will be an impossible position for Department of Fisheries.	Sanctuary zone boundaries have been placed, where possible, to maximise ease of compliance and enforcement and resources have been allocated for compliance activities.	No	2b
134	1	Department for Planning and Infrastructure requests to be permanently represented on the park Management Advisory Committee.	Membership will be considered when this committee is being established.	No	2c
135	2	Inaccurate statement pg. 54, fifth paragraph - zoning changes are not flexible.	Zoning can be changed during the life of the plan with a statutory public consultation process and Ministerial approvals.	No	2e
136	1	Biodiversity conservation through the marine reserves process and fisheries management is not fully integrated.	There was consultation with Department of Fisheries during the planning process to ensure integration of Fisheries management with the	No	2e

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
137	1	Question validity of zoning scheme due to extent of consultation with recreational user groups.	indicative management plan wherever appropriate. There has been extensive consultation in the development of the zoning scheme.	No	2d
138	3	<u>Development of a Zoning Scheme</u> Propose that explicit values/purpose of zones should be provided to avoid confusion regarding zoning boundaries (i.e. understand reasoning for identification of specific zone allocation).	The zoning scheme as a whole is one strategy in achieving management and strategic objectives and all zones contribute to the scheme. Whilst specific objectives for individual zones are not stated, the purpose of zone categories is clearly stated.	No	2d
139	1	Recommends that the design, purpose and objectives of areas closed to fishing be revisited and specific rationale and evaluation program developed.	The plan is still considered the best option.	No	2d
140	9	Planning process has failed to reach an equitable outcome by not offending the rock lobster fishing industry, thus receiving major concessions.	The planning process for the plan is still considered the best option and took into account the views of all stakeholders.	No	2e
141	1	Zoning scheme should have shown some relation to the original unbiased Wilson report.	Zoning options are not detailed in the Wilson report, which only recommends areas for consideration as marine conservation reserves. Zoning has evolved through the community consultation process.	No	2e
142	2	Zoning scheme should be simple for public to understand and to be able to comply with regulations.	Agree. Wherever possible zone types and boundaries are simple, however some complexities were inevitable in making concessions to recreational and commercial fishing groups for management zones.	No	2d

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
143	1	A contradiction exists between the fourth and fifth point on pg. 55.	There is no contradiction in these points. They refer to different impacts of the rock lobster industry.	No	2e
144	1	Aboriginal heritage sites (specifically within shore based activity zones) should be given a higher level of protection.	Comment was considered during the plan's preparation. Aboriginal sites are protected under the <i>Aboriginal Heritage Act 1972</i> .	No	2d
145	2	Absence of recreational zones.	Comment was considered during the plan's preparation. However a working group has been established to examine the proposal to establish a recreation zone off the Jurien Bay town site.	No	2d
146	1	Priori case for Special Purpose (Scientific Reference) zones is not strong, unless linked to clearly stated objectives, articulated research and monitoring program within a useful timeframe.	The indicative management plan recommends a range of research and monitoring strategies within the 10-year timeframe.	No	2d
147	2	Zoning inadequacies from an ecological perspective were not adequately considered during the preparation of the management plan.	The ecological deficiencies of the zoning scheme, as a result of concessions to fishing groups, are clearly identified in the plan. It should be noted however that zoning is only one of the management tools in achieving the conservation objectives. Education, enforcement, public participation, research and monitoring and adequate administrative frameworks (budget, staff, regulations etc.) will also be important in meeting the conservation objectives in the longer term. Development of a zoning scheme must take into account social objectives as well as conservation objectives.	No	2d
148	1	Table 2 doesn't identify long line or beach seining, which are approved commercial fishing activities in a general use zone.	Amendment to plan.	Yes	1e

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
		<u>Proposed Zones in the Jurien Bay Marine Park</u>			
149	21	Agree with the arrangement of zones within the proposed Jurien Bay Marine Park.	Support for the plan.	No	2a
150	25	Disagree with the arrangement of zones within the proposed Jurien Bay Marine Park.	The zoning scheme was developed in light of the contribution it will make to the management of the park and achievement of the conservation objectives and is still considered the best option.	No	2e
151	30	Agree that the establishment of sanctuaries and zones of reduced human impact provide an import strategy for marine management.	Support for the plan.	No	2a
152	12	Disagree that the establishment of sanctuaries and zones of reduced human impact provide an import strategy for marine management.	The zoning scheme of the plan is still considered the best option.	No	2e
153	1	Proposed that the marine park would be better located around Beagle Island.	The values of Beagle Island have been identified and will be considered in the future.	No	2c
154	4	Ecological management objectives would be best achieved by setting aside an adequate representation of the MPA's features.	Sanctuary zones are one management tool in achieving the conservation objectives. Education, enforcement, public participation, research and monitoring and adequate administrative frameworks (budget, staff, regulations etc.) will also be important in meeting the conservation objectives in the longer term.	No	2e
155	3	Propose review of zoning to reflect equity for all user groups.	The strategy of the plan is still considered the best option.	No	2d

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
156	2	Oppose sanctuary zones unless there are exceptional circumstances.	Areas free of significant disturbance are important for protection of marine biodiversity, and fulfill a range of other uses such as to gain an understanding of long-term variability and to ascertain the ecological impacts of human use.	No	2e
157	3	Support the establishment of sanctuaries and zones of reduce human impact.	Support for the plan.	No	2a
158	1	Propose review of zoning to meet conservation objectives (i.e. increase sanctuary zones).	The zoning should contribute to most conservation and scientific reference objectives. Zoning development must also take into account social objectives.	No	2d
159	1	Propose two large areas (up to 20%) be no-take areas.	The strategy of the plan is still considered the best option.	No	2d
160	1	Sanctuary zones are not adequate in size (12) for either direct conservation or scientific reference purposes (i.e. there is a need to demonstrate that the rock lobster fishery is ecologically sustainable and thus does not impact on ecological processes).	Research from other areas has shown benefits from very small no-take zones but generally, benefits increase with size. The issue of how large sanctuary ones should be (i.e. 'adequacy') will be considered through research strategies in the plan to support future reviews of the zoning scheme.	No	2d
161	1	Sanctuary zones do not represent the biological, physical and oceanographic components to the western seaward side of the islands (2) and habitat types - limestone pavement makes up 44% of the park and is not represented in sanctuary zones.	All habitats are currently represented in sanctuary zones with the exception of the deep water (>20 m) habitat.	No	2d
162	3	Sanctuary zones are not large enough to protect sea lion populations, which rely on much larger foraging ranges.	The strategy of the plan is still considered the best option. Sea lion populations are protected throughout the state under the Wildlife Conservation Act 1950.	No	2d

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
163	1	Propose sanctuary zones of at least 1km around sea lion breeding islands.	The strategy of the plan is still considered the best option.	No	2d
164	1	Propose protection for sea lion populations around Boullanger Island.	The strategy of the plan is still considered the best option.	No	2d
165	1	Sanctuary zones would have increased merit if they were located further south where human impact is reduced.	The strategy of the plan is still considered the best option.	No	2d
166	1	Sanctuary zones appear to over-represent areas of sandy bottoms and are small. Therefore significant benefits (protection of exploited or targeted stock) are unlikely.	All habitats are currently represented in sanctuary zones with the exception of the deep water (>20 m) habitat.	No	2d
167	3	Sanctuary zones do not adequately represent important habitats (e.g. sub tidal reef covered with seaweed) or represent adult rock lobster habitat.	All habitats are currently represented in sanctuary zones with the exception of the deep water (>20 m) habitat.	No	2d
168	1	Sanctuary zones should include reef, as reefs structures are a major habitat provider and should not be avoided just because professional Cray fishers regularly pot there.	All habitats are currently represented in sanctuary zones with the exception of the deep water (>20 m) habitat.	No	2d
169	5	Sanctuary zones should start (in the main) 100 metres offshore for recreational fishers.	The strategy of the plan is still considered the best option. Special Purpose (Shore-based Activities) Zones have been placed adjacent to some sanctuary zones to allow for recreational line fishing from the beach.	No	2d
170	5	Propose the shoreline adjacent to Grey and Target Rock sanctuary zones should be zoned for Special Purpose (Recreational Line Fishing or Shore based activity) zones.	Approximately 85% of the coast is open for recreational beach fishing. These small sanctuary zones provide protection for shoreline habitats.	No	2d
171	2	Propose Grey and Cavanah Reef sanctuary zones start 100m	Approximately 85% of the coast is open for recreational beach fishing. These small sanctuary	No	2d

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
172	1	offshore. Remove Cavanah Reef Sanctuary zone.	zones provide protection for shoreline habitats. The strategy of the plan is still considered the best option.	No	2d
173	5	Oppose the size and placement of Grey Sanctuary zone (safety issues).	The strategy of the plan is still considered the best option.	No	2d
174	1	Oppose Wedge Sanctuary Zone.	The strategy of the plan is still considered the best option.	No	2d
175	6	Oppose sanctuary zones that effect shore based fishing at Target Rock and Pumpkin Hollow.	The strategy of the plan is still considered the best option.	No	2d
176	6	Oppose sanctuary zones that effect shore based fishing at North Head.	The North Head Sanctuary Zone was amended and a special purpose (shore based activities) zone was included to allow shore based fishing on the southern shoreline.	Yes	1b
177	1	Propose Boullanger Island Sanctuary Zone is moved south.	Boullanger Island Sanctuary Zone contains an important area of reef habitat and the strategy in the plan is still considered to be the best option.	No	2d
178	1	Recommends the Grey Sanctuary Zone be discarded and replaced by two smaller sanctuary zones one to include Green Islets and one to include Buller Island.	The strategy of the plan is still considered the best option.	No	2d
179	2	Propose that the entire shoreline of the Boullanger Island sanctuary zone is covered by the Special Purpose (shore based activity) zone.	Boullanger Island Sanctuary zone contains an important area of reef habitat. The strategy of the plan was still considered the best option.	No	2d
180	3	Propose two of the sanctuary zones extend from the shoreline to the western park boundary (e.g. Grey SZ).	The strategy of the plan is still considered the best option.	No	2d

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
181	1	Propose one large sanctuary zone from shore to continental shelf covering all habitats.	The strategy of the plan is still considered the best option.	No	2d
182	1	Recommends changes to Grey Sanctuary Zone to take in more reef area.	The strategy of the plan is still considered the best option.	No	2d
183	1	Recommends changes to Green Island Special Purpose (scientific Reference) Zone to make boundaries easily identifiable and policing easier.	The strategy of the plan is still considered the best option.	No	2d
184	1	Green Island Special Purpose (Scientific Reference) zone should line up with Target Rock.	The strategy of the plan is still considered the best option.	No	2d
185	1	Propose the Green Islands Special Purpose (Scientific Reference) zone allows recreational boat fishing (safety issues).	The strategy of the plan is still considered the best option.	No	2d
186	4	Green Islets and associated lagoons should be assessed with a view to be made sanctuary zones.	The strategy of the plan is still considered the best option.	No	2d
187	5	Propose that rock lobster fishing is a significant human influence within Special Purpose (Scientific Reference) zones.	Whilst it is generally believed that these impacts are not significant, a risk assessment process in conjunction with the Marine Stewardship Council is underway to further consider the significance of these impacts. Research projects to quantify these impacts will also be undertaken in the near future.	No	2d
188	1	Extend Special Purpose (Scientific Reference) zones from coast to outer boundary and exclude rock lobster fishing.	The strategy of the plan is still considered the best option.	No	2d

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
189	1	Propose at least part of the Special Purpose (Scientific Reference) to be changed to sanctuary zones.	The strategy of the plan is still considered the best option.	No	2d
190	1	Propose 4-5km ² of sanctuary zones for scientific reference, which restricts everyone.	The strategy of the plan is still considered the best option.	No	2d
191	3	Oppose petroleum and mineral exploration in sanctuary zones.	Legislation permits seismic petroleum exploration in a sanctuary zone subject to environmental assessment.	No	2d
192	1	Support the retention of 77% of park for General-Purpose zone.	Support for the plan.	No	2a
193	10	Oppose Special Purpose (Scientific Reference) zones allowing rock lobster fishing - all access should be prohibited. These areas should be sanctuary zones.	The strategy of the plan is still considered the best option.	No	2d
194	1	Propose Special Purpose (Scientific Reference) zones permit abalone, crab and finfishing.	The strategy of the plan is still considered the best option.	No	2d
195	1	Large closure of line fishing area will concentrate fishing efforts and increase localized depletion.	The strategy of the plan is still considered the best option.	No	2d
196	2	Oppose commercial rock lobster fishing in special purpose (shore base activities) zone. (Safety concerns of commercial and recreational fishers in close proximity).	Plan amended.	Yes	1b
197	1	Propose that the Cervantes beach and Closest Bay south of township are open to provide safe recreational fishing.	These areas are open for recreational fishing.	No	2a
198	2	Propose formation of meaningful recreational zones to exclude commercial access, close to settlements.	A working group will examine the proposal to establish a recreation zone off the Jurien Bay town site.	No	2d

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
199	4	Oppose the fact that three of the five intensively used dinghy fishing areas are entirely or partially precluded by no-take zones (include safety issues boats have to leave sheltered waters).	The strategy of the plan is still considered the best option.	No	2d
200	3	Proposes special purpose (recreational line fishing) zone.	The strategy of the plan is still considered the best option.	No	2d
201	4	Oppose the loss of ~20% of the marine park to recreational fishing.	The strategy of the plan is still considered the best option.	No	2d
202	2	Rock lobster fishing has little restrictions, with large restrictions applying to line fishers.	The restrictions have been consistently applied to recreational and commercial fishing activities.	No	2b
203	1	Propose that an area south-west of the Grey settlement be designated to allow recreational boat fishing.	The strategy of the plan is still considered the best option.	No	2d
204	2	<u>Limitations of the Proposed Zoning Scheme</u> Statement on the limitations of the zoning scheme would have been better used as a disclaimer at the beginning of the document.	The strategy of the plan is still considered the best option.	No	2e
205	2	Controlled scientific research should be carried out in the marine park. <u>Education and Interpretation</u> <u>Surveillance and Enforcement</u>	Plan contains strategies to carry out scientific research both inside and adjacent to the park where appropriate, to increase understanding of the park and assist in management.	No	2d

Comment No.	No. of Submissions	Submission Comment	Discussion/Action Taken	Plan Amended	Criteria
206	1	<p><u>Research and Monitoring</u> Careful monitoring should be undertaken to identify any adverse ecological impacts of removing high proportions of lobsters.</p> <p><u>Public Participation</u></p> <p><u>PROPOSALS FOR MARINE INFRASTRUCTURE</u></p> <p><u>PERFORMANCE ASSESSMENT</u></p> <p>CALM is encouraged to develop measures and targets regarding indigenous heritage for the audit.</p> <p><u>REFERENCES</u></p> <p>No references provided for section 7.2.1. Indigenous heritage.</p> <p><u>INFORMATION SOURCES</u></p>	Monitoring strategies are outlined in the plan.	No	2a
207	1		Agree, as outlined in plan.	No	2a
208	1		Amendment to plan.	Yes	1e

APPENDIX 1: SUBMITTERS TO THE INDICATIVE MANAGEMENT PLAN

Individuals

Adams, R.H.	Holmes, W.	Morton, Graeme
Allbeury, Christine	Horvath, Joe	Oakely, G.
Anderton, Graham	Humbert, Martin	Pattinson, Robert
Anticich, Peter	Humbert, Pamela	Plozza, Sean
Armstrong, R.N.	Humbert, Peter	Potts, Merv
Berry, Peter	Joyes, Colin	Randell, Leanard
Bull, Martin	Kalanizich, Albert	Robinson, Ross
Chown, Alan	Knapp, Alan	Rowland, Richard
Collinson, Merv	Koncurat, Sam	Sanders, Ray
Crommelin, T.W.	Lamont, Neil	Smith, Norm
Crow, James	Lecras, P.A.	Stiles, Ian
Cusworth, Ron	Leeson, Graham	Stretton, R.J.F.
Derrick, Kitt	Lilleyman, Jim	Sutton, David
Donnelly, Chris	Loomes, Dennis	Thompson, Geoff
Fromont, Jane	Maeda, Ainslie	Trainor, Maureen
Grund, Roger	Marsh, L.M.	Walmsley, Graham
Harrold, Mike	Maunder, Jennifer Anne	Ward, Neville
Hill, J.	Maunder, Robert	Wass, Charles
Hill, R.J.	McArthur, Bernie	Wilson, R.J.
Holman, George	McGinlay, Dave	

Real Estate Developer

Ardross Estates

Community Groups/Representative Bodies

Australian Anglers Association WA Inc.
 Australian Coral Reef Society Inc.
 Australian Marine Conservation Society
 Central West Coast Professional Fisherman's Association Inc.
 Conservation Council
 Fremantle Amateur Angling Club Inc.
 Melville Amateur Angling Club Inc.
 Recfishwest
 Surf Casting and Angling Club of WA Inc.
 Wedge Island Protection Association Inc.
 Western Australian Fishing Industry Council Inc.
 Western Australian Game Fishing Association Inc.

Government (Local)

Shire of Coorow
 Shire of Dandaragan

Government (State)

Coastwest/Coastcare
 Department of Aboriginal Affairs
 Department of Fisheries
 Department for Planning and Infrastructure
 Heritage Council
 Water Corporation
 Western Australian Museum (Department of Aquatic Zoology)

