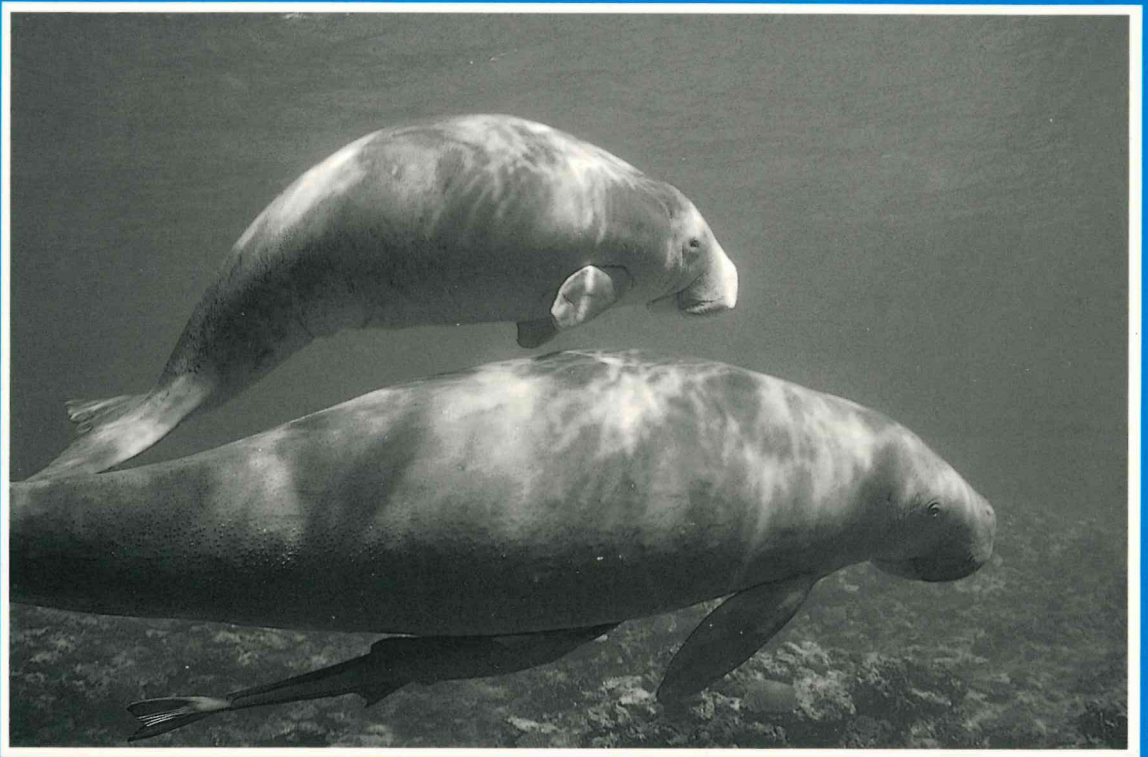


Shark Bay Marine Reserves

Analysis of Public Submissions



Management Plan No 34



Department of Conservation
and Land Management



National Parks and Nature
Conservation Authority



World Heritage

SHARK BAY MARINE RESERVES

SUMMARY AND ANALYSIS OF PUBLIC SUBMISSIONS

TO THE DRAFT MANAGEMENT PLAN

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SUMMARY OF THE ANALYSIS OF PUBLIC SUBMISSIONS

This document analyses submissions to the draft management plan for Shark Bay Marine Reserves. Comments have been detailed to the section of the draft management plan to which they refer.

The Shark Bay Marine Reserves draft management plan was released for public comment on 15 December 1994 by the Hon. Minister for the Environment, Kevin Minson. Advertisements were placed in local and Statewide newspapers advising that the draft management plan was available for comment. The draft management plan was distributed to State Government departments, tertiary institutions, conservation and recreation groups, local authorities, libraries and numerous individuals. Copies of the plan were available for perusal at the Denham and Carnarvon Shire offices. The plan was available for purchase from CALM's State Operations Headquarters, Midwest Regional Office and Denham District Office.

The plan was available for comment for a period of two months to 16 February 1995. However, all submissions received after this date were accepted. All submissions have been summarised and changes have been made to the plan where appropriate.

Method of Analysis

Submissions to the Shark Bay Marine Reserves draft management plan were reviewed in three stages:

- Public submissions were summarised to allow analysis;
- The submissions were assessed using the criteria below:
 1. The draft management plan *was* amended if the 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 goals and objectives; or
 - (e) indicated omissions, inaccuracies or a lack of clarity.
 2. The draft 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 plan;
 - (d) made points which were already in the plan, or were considered during plan preparation;
 - (e) was one amongst several widely divergent viewpoints received on the topic and the recommendation of the draft plan was still considered the best option; or
 - (f) contributed options which were not possible (generally due to some aspect of existing legislation or Government policy).
- The draft management plan was reviewed and amended where necessary. Minor editorial changes referred to in the submissions have also been made.

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

Number and Origin of Submissions Received

35 submissions were received (see page 37 for a list of submitters). All were substantive submissions, ie. no proformas or petitions were received.

A breakdown of the origin of submissions is as follows:

Community Organisations	5
Government (Local)	1
Government (State)	15
Individuals	5
Industries	7
Educational Institutions	<u>2</u>
TOTAL	35

ANALYSIS TABLE

The Analysis Table in this document contains:

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

SUBMITTORS TO THE DRAFT MANAGEMENT PLAN

1. Crown Law Department
2. Paul K Anderson - University of Calgary
3. Bush Fires Board of WA - Central West Region Headquarters
4. Department of Resources Development
5. Main Roads Department WA
6. Nor-West Seafoods Pty. Limited
7. Dr Anthony Preen - James Cook University
8. WA Tourism Commission
9. WA Museum
10. Clough Resources
11. LM Marsh - Research Associate, WA Museum
12. Department of Minerals and Energy
13. RAOU
14. Correia Fishing Co.
15. Gascoyne Development Commission
16. Shine Fisheries Limited
17. Shark Bay Prawn Trawler Operators Association Inc.
18. The Chamber of Mines and Energy
19. MG Oliver
20. Trophy Bay Pty Ltd
21. Shire of Shark Bay
22. Shark Bay Water Ski Club
23. Conservation Council of WA
24. Australian Heritage Commission
25. EJ Purser
26. Department of the Environment, Sport and Territories
27. WA Recreational and Sportfishing Council Inc.
28. PG Shepherd
29. Aboriginal Affairs Department
30. Bob Brislin
31. WA Maritime Museum
32. Fisheries Department of WA
33. Mr Dyson
34. Boating Industry Association of WA (Inc)
35. Raven Multihulls Pty Ltd

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
		GENERAL COMMENTS			
1	1	The management plan is comprehensive and practical in relation to the areas covered.	Supports draft management plan.	No	2 (a)
2	1	Park management strategies must take the long view into account and plan a century ahead.	The CALM Act states that management plans cannot exceed a 10 year period.	No	2 (c)
3	1	A strategic approach in developing the potential of the Shark Bay area is critical to ensure protection of the ecological environment while providing for sustainable benefits. It is considered important that the planning framework is coordinated as much as possible and that management plans are done in tandem and complement each other.	No change sought.	No	2 (b)
4	3	Would like to see a much stronger [conservative] approach to management of this important area. The necessary precautionary principle is not reflected in the majority of the plan.	A more conservative approach is not considered to be necessary to protect the conservation values of the reserves.	No	2 (e)
5	1	Plan should address the issues of cumulative impacts and incremental development, which are often not taken into account in normal impact assessment processes.	Considered in plan preparation.	No	2 (d)
6	1	Plan should include a discussion of the measurable 'indicators' which will be used to assess the efficacy of the measures in the Plan in achieving its stated objectives. This will be essential in developing the annual monitoring report for World Heritage properties which is a requirement under the World Heritage Convention.	Measurable indicators are a useful tool. Monitoring the plan's implementation may utilise these methods however it is not necessary to make this explicit in the plan.	No	2 (d)
7	1	In general terms, cannot dismiss our ongoing concerns as to what the future holds for our industry (trawling) when considering the events that have, and are currently, taking place within other World Heritage Areas around various parts of the world.	No change sought.	No	2 (b)
8	1	Concern for the future management of this area is that the belief that sustainable commercial fishing can occur within Marine Parks may not be supported by changing Governments and/or public perception in five or ten years hence, and that commercial operations will be forced to abandon traditional fishing grounds.	No change sought.	No	2 (b)
9	2	The charts presented in the Plan are inaccurate and on much too small a scale to be interpreted.	Figures have been reviewed and have been increased to A3.	Yes	1 (e)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
10	2	The distinction between nautical miles and statute miles has not been made - particularly in defining the extent of the Wooramel seagrass areas.	Figures have been reviewed and amended.	Yes	1 (e)
11	1	The draft plan has large gaps in information, particularly in the area of fisheries.	Fisheries issues are dealt with in the Shark Bay World Heritage Area Fish Resources Draft Management Plan.	No	2 (c)
12	1	It is pleasing to note the role accorded to Aboriginal people in the plan.	Supports draft management plan.	No	2 (a)
		1.1 OVERVIEW			
1	1	Figure 2 and 4 - The Hamelin Pool Marine Nature Reserve could be delineated more clearly.	Figures amended.	Yes	1 (e)
		1.2 WORLD HERITAGE LISTING			
1	5	The estimated size of the dugong population (10 000) is questioned. Believe it is closer to 1000.	Dugong estimates are based on scientifically valid surveys in 1989 and 1994.	No	2 (d)
2	1	The major foreseeable threats to the Area's World Heritage values could arise from; coastal developments in all its forms, mining (including petroleum exploration), marine pollution including the introduction of exotic species through ballast water and recreational and commercial fishing, particularly trawling, with its potential to modify the benthic environment.	These potential threats were considered in the plan.	No	2 (d)
		1.3 VALUES			
1	2	Conservation Values - After thirty years of trawling, Shark Bay is a relatively undisturbed ecosystem.	No change sought.	No	2 (b)
2	2	Commercial Values - It would be appropriate to include mineral resources in the catalogue of commercial values; Shark Bay Salt Joint Venture operation, Clough and AMP mining tenements over strategically important gypsum deposits on Peron Peninsula.	"Commercial values" are values specific to the marine reserves. Salt mining and gypsum deposits occur outside the reserves.	No	2 (c)
3	2	Commercial Values - Note with satisfaction that the report does recognise the prawn industry's total dependence upon the maintenance of the quality of the marine environment.	Supports draft management plan.	No	2 (a)
4	1	Recreational Values - first line, "Shark Bay is a recreation destination of local, state...". Delete "local".	The area <u>is</u> very significant locally for recreation.	No	2 (d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
		2.0 PRINCIPAL MANAGEMENT DIRECTIONS			
1	1	Management of the Reserves must take into account the future development of Denham. Planning should not envisage unlimited growth for the Denham community, but should instead encourage definition of an optimum population size and level of commercial development.	Beyond the scope of the plan.	No	2 (c)
2	1	Planning should enlist the participation of the Denham community in envisaging the kind of community it should be.	Beyond the scope of the plan.	No	2 (c)
3	1	Have some serious concerns about some of the 'principal management directions' which have directed the management goals for the reserves.	Concerns about principal management directions were not defined.	No	2 (b)
		2.1 GOALS			
1	1	Recognising that "Goals" are defined in the appropriate Acts, I am uneasy that the statements appear to place priority on "enjoyment" rather than "protection".	Under the CALM Act recreation is a prime purpose of marine parks provided that it is consistent with conservation.	No	2 (d)
2	3	It is generally pleasing to see that this plan supports the belief that sustainable commercial fishing can occur within Marine Parks.	Supports draft management plan.	No	2 (a)
3	1	Consider that the aims of reservation of marine parks and reserves under the CALM Act 1984 as outlined in the plan conflict with one of the six principal goals proposed for management of the Marine Reserves, namely 'commercial and other uses'.	The CALM Act provides for sustainable commercial and recreational fishing to occur in marine parks.	No	2 (f)
4	1	Interaction with Nearby Lands and Waters - Delete "These goals are a long-term desirable aim."	Text amended.	Yes	1 (e)
		2.2.2 SHARK BAY MARINE RESERVES			
1	1	Supports recommendation 4.	Supports draft management plan.	No	2 (a)
2	1	Endorse recommendations 1, 2, 3 and 4.	Supports draft management plan.	No	2 (a)
3	1	Little Lagoon should not be included in the Marine Park, World Heritage Area. The Reserve is vested in Council and Council have no intention of surrendering the Reserve.	Little Lagoon is already gazetted as marine park. The surrounding land reserve is vested in Council and there is no reference to this reserve's tenure being changed.	No	2 (f)
4	1	It will be important to keep the option of extending the reserve boundaries to the line of Bernier and Dorre Islands open. I commend the proposal for a biological survey of the area.	The proposal for marine park adjacent to Bernier and Dorre Islands will be considered on the basis of results of the biological survey conducted in May 1995.	No	2 (d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
5	3	The text does not exclude from Shark Bay Salt's leases the 40m wide strip of VCL recommended for vesting in the NPNCA.	Text and figure amended.	Yes	1 (b)
6	1	If trawling grounds were included in the marine park there is a possibility that the impacts of trawling would be more closely investigated.	Primarily the responsibility of the Fisheries Department.	No	2 (c)
7	1	The existing Marine Park boundaries along the Wooramel Bank and the western section of the arc around Cape Peron need to be reviewed.	This conflicts with gazetted position of boundary. However text amended and new recommendation in relation to the clarification of the boundary in liaison with the fishing industry.	Yes	1 (b)
8	1	Strongly recommend the extension of the marine reserve to include all of the World Heritage Area to the north; a) the existing boundary has no ecological basis and is a result of bargaining with commercial fishing interests. b) recent research has shown that the existing boundary does not adequately protect the habitat of the Shark Bay dugong population. c) the areas around Bernier and Dorre Island need to be included in the Marine Reserves.	This conflicts with the gazetted position of boundary, however the areas around Bernier and Dorre Island are recommended in the plan for consideration as marine park.	No	2 (c)
9	1	The Marine Park boundaries should be expanded to enclose all of Shark Bay - a substantial proportion of dugongs, turtles, whales and manta rays have been sighted outside the Marine Park boundaries and so the boundary should be extended to protect these habitats.	This conflicts with gazetted position of boundary. It should be noted that management of wildlife outside reserves can be conducted through the Wildlife Conservation Act.	No	2 (e)
3.1 DEPARTMENT OF CONSERVATION AND LAND MANAGEMENT					
1	1	Dugongs should be managed under the CALM Act.	Dugongs are managed under the CALM and Wildlife Conservation Acts.	No	2 (a)
2	1	We question the department's objective to "optimise the ... economic return to the community of wildlife, lands, waters and resources entrusted to the Department...". Experience overseas has shown that pursuing this objective has led to a compromising of conservation objectives and a loss of conservation values.	Beyond the scope of the plan.	No	2 (c)
3	2	Concerned that the Fisheries Act prevails over the CALM Act in an area which is a declared reserve.	Beyond the scope of the plan.	No	2 (f)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
1	1	3.2 FISHERIES DEPARTMENT OF WESTERN AUSTRALIA Fisheries Department's mission statement and objective - "Ecologically Sustainable Yield" is open to various interpretations. Does it mean "Maximum Sustained Yield", a concept with a long record of failure?	Beyond the scope of the plan.	No	2 (c)
2	1	Would like to see the Fisheries Department's objective stated in the form of "maintenance of the integrity and biodiversity of the ecosystem."	Beyond the scope of the plan.	No	2 (c)
1	1	3.3 INTERAGENCY RESPONSIBILITIES Endorse recommendation 1 and 2.	Supports draft management plan.	No	2 (a)
2	1	Mention should be made of the Department of Resources Development, which manages the Agreement Act under which the Shark Bay salt field is operated.	Section amended.	Yes	1 (e)
3	1	Reference should be made to the Port of Carnarvon, the waters of which extend into the marine park.	Section amended.	Yes	1 (e)
4	1	The State also has an obligation under the Agreement Act to provide and maintain navigation aids in Denham Channel.	Section 7.2.2 amended.	Yes	1 (e)
5	1	Reference should be made to the Mining Act's requirement that exploration or mining in marine areas and conservation reserves requires the concurrence or advice of the Hon Minister for the Environment.	Not necessary, the plan details the procedures broadly.	No	2 (d)
6	1	Are the "Marine Act 1982 (State)" and the "Western Australian Marine Act 1982" different?	Section amended.	Yes	1 (e)
7	1	The draft plan was prepared during the period when the provisions of the Land Act (Titles and Traditional Usage) Act 1993 prevailed. The draft management plan, in its present form, does not adequately meet the requirements of the Native Title Act.	Section 3.3 and 5.7 amended to remove reference to this Act.	Yes	1 (e)
1	1	3.4 INTERNATIONAL TREATIES Endorse recommendation 1, 2 and 3.	Supports draft management plan.	No	2 (a)
2	1	Strongly recommend that the Commonwealth continue to have a separate and independent role and responsibility in ensuring that national and international treaties and legislation are upheld.	Nothing in the draft plan denigrates the Commonwealth's role in this regard.	No	2 (b)
3	1	Third paragraph, second line - replace "Property" with "Area".	Plan amended.	Yes	1 (e)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
4	1	New recommendation - add "Commonwealth cooperation and assistance in management will be sought in order to achieve national and international obligation."	New recommendation in Section 3.4.	Yes	1 (d)
1	2	4.1 PRINCIPLES OF ZONING Because of flexibility required to manage the prawn industry on a "real time" basis it is important that fisheries boundaries do not come to be regarded as zoning boundaries thereby incorrectly drawing fishery boundaries into a prolonged public review process when perhaps an area needs to be closed immediately.	The Fisheries Department has responsibility and powers to place restrictions immediately in regard to recreational and commercial fishing. Zoning would not effect this ability.	No	2 (f)
2	1	Endorses the zoning scheme for the Shark Bay Marine Reserves at it proposes a multiple use approach to the management and conservation of marine areas.	Supports draft management plan.	No	2 (a)
3	2	Table 1 - resource development activities (salt, gypsum, petroleum exploration) should also be referred to in this table under the category of commercial activities.	Table amended to include petroleum exploration.	Yes	1 (e)
4	1	Believe that further areas should be included as Sanctuary or Special Purpose.	This is one of many widely divergent viewpoints. No additional zones have been included in the zoning plan, however provision is made to review and amend zoning within the life of the plan (subject to public consultation.	No	2 (e)
5	1	Table 1 - add "Zone" to each of the four column headings.	Table amended.	Yes	1 (e)
6	1	Table 1 - replace "Spp" with "spp"	Table amended.	Yes	1 (e)
7	1	Figure 4 - reorder the zones to read as they appear in the text ie. Sanctuary Zone, Recreation Zone, Special Purpose Zone, General Use Zone.	Amended.	Yes	1 (e)
8	1	Figure 4.1 to 4.17 - for consistency use same shadings as for Figure 4.	Figures amended.	Yes	1 (e)
9	1	Dogs should not be permitted in marine reserves.	Insufficient justification for this policy. At specific sites this may be applicable, eg. Monkey Mia, however this can be done on a case by case basis.	No	2 (e)
1	1	4.2.1 SANCTUARY ZONES Shag Mia might be considered for Sanctuary status (used for nesting by the pied cormorant). Several hides could be constructed to provide viewing sites that could be used without disturbing the colony.	Sanctuary zoning of the surrounding waters is not necessary to provide protection for nesting pied cormorants.	No	2 (d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
2	1	The Guichenault spit has substantial mangrove habitats at its base, and is an important nesting ground for gulls, terns, and various shore birds.	Is an area highlighted for investigation during the life of the plan for possible zoning.	No	2 (d)
3	1	Meade Island is an important nesting site for terns and needs better protection than it has had in the past.	Will be covered in the Shark Bay Terrestrial Reserves management plan.	No	2 (c)
4	1	Recommend a Sanctuary Zone be developed at the Broadhurst coral patch opposite Cape Lesueur.	Broadhurst coral is one of several areas which will be investigated for possible sanctuary zone during the life of the plan (see Section 4.2.4).	No	2 (d)
5	1	Sandy Point Sanctuary Zone - Suggest that a beacon be established at Sandy Point, and another at the outer edge of the offshore shoal, to mark this zone. Moorings should also be established for dive boats.	Section amended. Moorings will be addressed in the production of a mooring strategy (Section 9.3).	Yes	1 (d)
6	1	Surf Point Sanctuary Zone - There is typographical error in coordinates.	Text amended.	Yes	1 (e)
7	1	Surf Point Sanctuary Zone - For consistency the minutes should be expressed as 7' or 07', the diagram has both.	Amended.	Yes	1 (e)
8	1	Surf Point Sanctuary Zone - There are a number of significant features near the SW boundary of this zone which should be included in the Sanctuary Zone.	These features are in fact on the south side of South Passage and are a significant distance from the proposed zone.	No	2 (d)
9	1	Gudrun Wreck Sanctuary Zone - do not oppose the extension of the zone around the wreck.	Supports draft management plan.	No	2 (a)
10	1	Page 33, second line - after 23 genera add "a further three genera and 11 species were recorded outside the Outer Bar at 15-20 metres" (see Walker, 1990).	Amended.	Yes	1 (e)
11	1	Lharidon Bight Sanctuary Zone - the proposed sanctuary zone should not extend beyond LWM and must not impinge on the shell extraction area or the Shire Reserve.	The marine park (and therefore sanctuary zone) extends to HWM. It will not however impinge on existing reserves and leases for shell extraction.	Yes	1 (b)
12		Recommend a Sanctuary Zone around a small reef approximately 8 miles north of Monkey Mia to protect it from fishing.	This area will be investigated during the life of the plan to determine whether zoning is an appropriate action.	No	2 (e)
1	1	4.2.2 RECREATION ZONES Monkey Mia Recreation Zone - there is a potential for collision between boats and dugongs at Monkey Mia. Suggest a 5 knot speed limit within the Monkey Mia Recreation Zone.	Currently 8 knots is considered acceptable.	No	2 (d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
2	1	Monkey Mia Recreation Zone - recreational fishing should not be permitted in the Monkey Mia Recreation Zone.	One of several divergent views. The plan will provide for compatible recreational fishing activities.	No	2(e)
3	1	Monkey Mia Recreation Zone - concerned that the boundary description for the Monkey Mia Recreation Zone will not adequately provide for the "protection of dolphins and the maintenance of the dolphin interaction experience" as defined in the objectives of the zone as the zone does not cover the daily home range of the provisioned (beach) dolphins.	Text amended to ensure the provisioned dolphins home range is protected.	Yes	1 (d)
4	1	Monkey Mia Recreation Zone - it is imperative that waterskiing, jet skis and high speed motorised water sports are not permitted in this zone.	Supports draft management plan.	No	2 (c)
5	1	Monkey Mia Recreation Zone - suggest that a 4 knot speed limit would be appropriate in this zone and that the speed limit and zone be visibly displayed at the boat ramp.	Current 8 knots is considered acceptable however there is flexibility in the plan to decrease speed limits if needed.	No	2 (d)
1	1	4.2.3 SPECIAL PURPOSE ZONES Gladstone Special Purpose Zone - Would prefer a different schedule of closure, reflecting the way the dugongs use this area. a) The area north of the main channel (dugong nursery area) should be closed to all vessels between 1 December and 15 April, providing protection for the cow-calf herds grazing the <i>Halodule uninervis</i> beds in North Cove. b) The area south of the main channel should be closed to all vessels between 1 September and 15 January to protect the very vulnerable males holding territories in South Cove.	Closed waters altered to provide more protection in line with this information. a) Area north will be closed between 1 December to 30 March. b) Area south will be closed between 1 September to 15 January.	Yes	1 (d)
2	1	Gladstone Special Purpose Zone - Set nets should be allowed in the general use area only when set from shore (not from vessels) and nets should not be set south of the jetty at any time.	Netting will be managed in the general use and special purpose zone as per Fisheries Department regulations.	No	2(d)
3	1	Gladstone Special Purpose Zone - It is important that great caution should be exercised with respect to the mating behaviour in South Cove. The behaviour there is so far unique in the world, both for dugongs and for marine mammals of all kinds.	Supports draft management plan.	No	2 (a)
4	1	Gladstone Special Purpose Zone - the channel should be left open all year round and navigation markers be installed to protect the dugong breeding grounds from being traversed by straying pleasure craft.	Supports draft management plan.	No	2 (a)
5		Freycinet Special Purpose Zone - page 43, typographical error; <i>Halophylla</i> should read <i>Halophila</i> (see Walker, 1990).	Text amended.	Yes	1 (e)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
6	1	Freycinet Special Purpose Zone - up to 40 dugongs feed on <i>Halophila spinulosa</i> beds between Three Bays Island and Baudin Island beginning in September, and dugongs abandon Freycinet Harbour entirely in winter (June-August). Large concentrations of dugongs have been seen in the vicinity of Salutation Island in the summer in some years.	Text amended.	Yes	1 (e)
7		Freycinet Special Purpose Zone - as the dugong herd seems to divide into a Wooramel-Gladstone-Faure group and a Freycinet group in the summer months the Freycinet Special Purpose Zone may contain a mating centre like that at Gladstone.	No change sought.	No	2 (b)
8	3	Wooramel Special Purpose Zone - appears that this zone extends further west than the seagrass beds actually are and into traditional trawling ground.	Section 7.1.1 Trawling details strategies to accurately delineate traditional trawling grounds. These areas will allow for these activities.	No	2 (a)
9	1	Cape Peron Special Purpose Zone - to read "...large cod, sharks and an abundance of smaller fish species."	Text amended.	Yes	1 (e)
10	1	Table 2 - when indicating that certain ventures may be allowed in the Freycinet and Wooramel Special Purpose Zones, the text should also make the mention that seacage operations will generally not be allowed as the area has extensive seagrass beds. Seacages located over seagrasses have been shown to adversely affect the seagrass.	Text amended.	Yes	1 (d)
11	1	Table 2 - "wetlining" is termed 'line fishing' in this table.	No change sought.	No	2 (b)
		4.2.4 GENERAL USE ZONES			
1	1	Endorse recommendation 1 and 2.	Supports draft management plan.	No	2 (a)
2	1	Recommendation 3 - should allow for additions (rather than 'changes' which could include removal of areas) to Sanctuary and Special Purpose Zones, ie. inclusion of further areas identified by ongoing research.	Changes to zone boundaries or category may be appropriate during the life of the plan.	No	2 (e)
		5.1 CLIMATE AND OCEANOGRAPHY			
1	1	Endorse the recommendations.	Supports draft management plan.	No	2 (a)
2	1	Paragraph 2 - this paragraph is not very clear eg. what is meant by "...average between 20°C and 35°C..." and "Annual rainfall is low, ranging from 200 mm to 400 mm". Is this across the Bay?	Text amended.	Yes	1 (e)
3	1	Paragraph 3 - some of the places referred to do not appear on any of the maps/figures.	Figure amended.	Yes	1 (e)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
4	1	Page 47, last paragraph - definitions for metahaline and hypersaline are not consistent with Figure 5.	Text amended.	Yes	1 (e)
		5.2 GEOLOGY AND GEOMORPHOLOGY			
1	1	What recreational or commercial activities have the potential to cause erosion to the seafloor? Natural occurrences such as tidal movement have more potential to influence changes to the seafloor than have recreation or commercial activities.	Strategy amended to include "natural forces" as a potential cause of erosion to the seafloor.	Yes	1 (e)
2	1	The Geological Survey has carried out extensive studies of the geology of Shark Bay and on the stromatolites of Hamelin Pool, but there is no reference to this work in the plan. Relevant references are included in the paper by Playford (1990) and Wilson (1990).	Text amended to include references.	Yes	1 (e)
3	1	The Quaternary rocks were deposited not only on the Cretaceous Toolonga Calcilutite, but also on silicified sandstones of the Tertiary Lamont Sandstone.	Text amended.	Yes	1 (e)
4	1	There should be reference made to the Zuytdorp Cliffs and to the fact that the Peron and Edel Land Peninsulas, and Dirk Hartog Island, are known to overlie major anticlinal structures developed in Tertiary and older rocks. These anticlines, and the Zuytdorp Fault, could have been active during Quaternary times.	Zuytdorp cliffs are not in the marine reserves.	No	2 (c)
5	1	Further recommendations are suggested for the geology and geomorphology section: a) Study the evidence for Quaternary folding and faulting in the area. b) Study the geology and geomorphology of birridas and their contained gypsum deposits. c) Investigate deposits of industrial minerals in the area and the environmental impact resulting from their exploitation.	Not marine reserves management issues.	No	2 (c)
6	1	Believe that the word 'control' should be replaced by 'prevent'.	No change.	No	2 (d)
		5.3 MARINE HABITATS			
1	1	Endorse recommendation 1 and 2.	Supports draft management plan.	No	2 (a)
2	1	Figure 6 - Local fishermen have indicated that the areas of seagrass beds are not accurate as shown on the map. Beds in the vicinity of Cape Peron and along the Wooramel Bank are shown to encroach outside of the Marine Park boundaries when, in fact, they do not. The map should be corrected.	More accurate mapping is now available and has been incorporated.	Yes	1 (e)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
3	1	Figure 6 - the diagram purports to show the distribution of marine habitats but the area designated seagrass excludes the Wooramel Seagrass Bank.	Figure amended.	Yes	1 (e)
4	1	New recommendation - "To assess the extent of habitat damage by commercial and recreational activities in order to prioritise management activities."	New strategy.	Yes	1 (d)
		5.4.1 MICROBIAL COMMUNITIES			
1	1	Endorse recommendations 1, 3 and 4.	Supports draft management plan.	No	2 (a)
2	1	The heading for this section should be changed from "Microbial Communities" to "Stromatolites".	'Stromatolites' does not encompass other microbial communities such as algal mats.	No	2 (a)
3	1	The terms "microbiolites" and "stromatolitic microbiolites" are used instead of the word "stromatolites". This usage of technical jargon is unnecessary.	Text amended.	Yes	1 (e)
4	1	It needs to be made clear that the Hamelin Pool stromatolites are built mainly by cyanobacteria, although algae also contribute.	Text amended.	Yes	1 (e)
5	1	The recommendations include the need to construct a boardwalk at the Telegraph Station, despite the fact that this was completed many months ago.	Completed since draft prepared, text amended.	Yes	1 (e)
6	1	The recommendations made to CALM in Playford's report "Tourist access to stromatolites and shell deposits at Hamelin Pool" dated 24 May 1993 was ignored. The question of the siting of tourist facilities at Hamelin Pool certainly needs to be addressed in the plan.	Text amended to include reference. The specific siting of tourist facilities is outside the scope of the plan. It is however addressed in a general sense.	Yes	1 (e)
7	1	Recommendation 2 - remove the words "to minimise".	This change would alter the intent of the strategy.	No	2 (d)
		5.4.2 SEAGRASS COMMUNITIES			
1	1	Endorse recommendations 1, 2, 3 and 4.	Supports draft management plan.	No	2 (a)
2	1	If a suitable location can be found a boardwalk for viewing seagrass might supplement that for viewing stromatolites.	No change required. This plan allows for such facilities to be provided if there is a need or demand.	No	2 (d)
3	1	The effects of trawling on any seagrass meadows should be investigated, as these areas are clearly important winter, and possibly summer, habitats for dugongs.	Supports draft management plan.	No	2 (a)
4	1	Strongly recommend that the impacts of current activities be assessed as a matter of urgency, particularly due to the fact that commercial fishing will continue across the majority of the Wooramel Seagrass Bank and its impact is virtually unknown.	The draft management plan supports the monitoring of the impacts of all activities. This is not however seen as a matter of urgency given existing use.	No	2 (a)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
5	1	Protection of the dugong herds requires that their habitat be protected; ie. the <i>Amphibolis</i> beds along the eastern shore of Dirk Hartog Island; the <i>Halophila spinulosa</i> beds off the western edge of the Wooramel Bank; the <i>Halodule</i> beds in the Gladstone area (protected - but vulnerable to pollution and sedimentation from the Wooramel drainage); and the <i>Halophila</i> beds in Freycinet Harbour (protected).	Text amended to include specific reference to these areas.	Yes	1 (e)
6	1	Have two specific concerns regarding dugong forage resources: a) The northern part of the <i>Halophila spinulosa</i> beds off the Wooramel are open to trawling. We have no information on the direct risk to dugongs, or disturbance from trawling. b) At one time there were proposals (rejected) for mining of mineral sands in the northwestern Bay. Should demand for such exploitation arise again, the potential exists for destruction of seagrass beds throughout the Bay as a result of pollution (toxic tailings), or sedimentation.	a) Not within the marine reserves. b) Proposals for mining would be addressed in accordance with Government policy.	No No	2 (c) 2 (b)
7	2	The winter distribution of dugongs suggests the presence of more deep water seagrass meadows, similar to those east of Cape Peron. The mapping of habitats in these areas (particularly Denham Sound) should be a high priority.	Not within the marine reserves but this is now being done.	No	2 (c)
8	3	It should be noted that prawn trawlers do not operate in seagrass areas for three obvious reasons - 1. Most importantly, seagrasses are the nursery areas for prawns. 2. The prawns that would be inside seagrass beds are too small to be marketed. 3. A prawn net immediately clogs with weed in a seagrass area.	The draft plan does not suggest that trawlers operate in seagrass.	No	2 (b)
9	1	Page 54, first line - replace "rely" with "feed".	Text amended.	Yes	1 (e)
		5.4.3 MANGROVE COMMUNITIES			
1	1	Endorse recommendations 1, 3, 4 and 5.	Supports draft management plan.	No	2 (a)
2	1	Recommendation 4 - agree with recommendation but would like to emphasise the need to ensure the impact of each use, be it aquaculture activities, coastal developments, recreation or any other activity, is considered independently.	No change sought.	No	2 (b)
3	1	Recommendation 2 - strongly recommend that this recommendation be replaced with "That there be an immediate ban on set netting in all tidal creeks."	Insufficient information to prohibit this activity in the plan, however the plan does highlight the need for more information on the effects of this activity.	No	2 (d)
4	1	The impact of other types of fishing methods in tidal creeks should be investigated and controlled where necessary.	As above.	No	2 (d)
		5.5.1 CORAL COMMUNITIES			
1	1	Endorse recommendations 1, 2, 3, 4 and 5.	Supports draft management plan.	No	2 (a)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
2	1	Hermatypic does not equate to hard corals. It literally means reef-building but is usually equated to zooxanthellate corals ie. dependent on light for photosynthesis by their zooxanthellae.	Text amended.	Yes	1 (e)
3	1	Both hermatypic and ahermatypic corals are "hard". The list of 80 species (Marsh, 1990) does not include the ahermatypic corals of which there are several species in Shark Bay.	Text amended.	Yes	1 (e)
4	1	Recommendation 4 - consideration should be given to installing permanent moorings in the most popular dive and snorkelling locations to remove the likelihood of anchor damage to corals.	New strategy to ensure this option is considered in certain areas.	Yes	1 (d)
5	1	New recommendation - "Assess current impacts and implement management strategies to prevent further damage."	New strategy (Section 5.3).	Yes	1 (d)
6	1	Page 56, third paragraph - change to "...generally comprise coral rubble."	Text amended.	Yes	1 (e)
		5.5.2 OTHER INVERTEBRATES			
1	1	There is need for information on the significance of molluscs, sea pens and tunicates as a food source for dugongs as sand flats could be important foraging grounds.	Need for dugong research identified in plan.	No	2(d)
2	1	Line 3 - Bryozoans should read Bryozoans.	Text amended.	Yes	1 (e)
3	1	Support the total protection of the invertebrate species as listed on page 152.	Supports draft management plan.	No	2 (a)
		5.5.3 FISH			
1	1	Support recommendation 3.	Supports draft management plan.	No	2 (a)
2	1	The provision for destruction of sharks that represent a danger to the public might be reworded to read "individuals" rather than "animals".	Text amended.	Yes	1 (e)
3	1	The plan mentions the need to protect large sharks from recreational fishers - Commercial fishers and aquaculture proponents that are plagued by sharks breaking their seacage nets and removing their stock should be able to request a permit from CALM to have the shark destroyed, provided they have first tried all known harmless methods to deter the animal.	Text amended to note this and the procedure for approval to destroy individual sharks.	Yes	1 (b)
4	2	All fish feeding within the Bay should be discouraged by CALM or even prohibited.	Text amended and new recommendation to discourage fish feeding at popular visitor sites.	Yes	1 (d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
5	1	The plan states that fish fauna of the marine reserves is not well documented - the plan fails to give any adequate information on catch size or by-kill. There is insufficient information to assess whether the current level of fishing is sustainable.	Fisheries Department has detailed information on these factors and advises that fishing activities are sustainable.	No	2 (d)
6	1	Recommendation 1 - reject this recommendation. There should be no new commercial fisheries considered until information is available to determine whether it is sustainable. Then any proposed new fisheries must be subjected to full environmental assessment.	Sustainability is a requirement of any new fisheries.	No	2 (d)
		5.5.4 REPTILES			
1	1	Endorse recommendation 1, 2 and 3.	Supports draft management plan	No	2 (a)
2	1	The Shark Bay Sea Snake, <i>Aipysurus pooleorum</i> is unique to Shark Bay which should be mentioned.	Text amended	Yes	1 (e)
3	1	The State of the Marine Environment Report (SOMER) states "The main human impacts occurring while turtles are in Australian waters are: mortality of adults in prawn trawl, shark nets and gill nets, and in collision with speed boats; subsistence hunting by indigenous communities; habitat degradation; and predation on eggs by feral animals." The plan does not provide enough information on such impacts in the Shark Bay area therefore it is not possible to provide comment on these impacts in the Marine Reserves. Recommend that information is obtained on such impacts. (There is limited information on these impacts)	Supports need for research. Text amended (there is limited information on these impacts).	Yes	1 (b)
4	1	The summer distributions of all turtles are unknown. A summer survey of Shark Bay should be undertaken to determine the location of the most important habitats.	Supports draft management plan.	No	2 (a)
		5.5.5 BIRDS			
1	1	Support recommendations 1, 2 and 3.	Supports draft management plan.	No	2 (a)
2	1	The Shag Mia cormorant colony should be made into a Sanctuary Zone.	Outside the marine reserves.	No	2 (c)
3	1	New recommendation - "That a sanctuary zone be created around Pelican Island to minimise disturbance to nesting birds."	Unnecessary as protection can be afford with simpler boating restrictions (see Section 5.5.5).	No	2 (d)
4	1	I have seen local haul netters allowing a dog to run loose on Pelican Island. This suggests a need for more public education in this area.	The draft management plan supports the need for more public education about Pelican Island.	No	2 (a)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
5	1	Consideration should be given to protection of sea eagle and osprey nesting sites, and perhaps construction of hides from which such sites could be observed without disturbance.	Supports draft management plan.	No	2 (a)
6	1	Recommendation 2 - What management measures are required to minimise disturbance to birdlife by recreational and commercial activities?	No change sought. This is a broad strategy to deal with problems should they arise.	No	2 (b)
7	1	A count of 50 000 Shorebirds places Shark Bay Marine Reserve area as 12th nationally as a Shorebird site, exceeding any more southerly sites in WA.	Text amended.	Yes	1 (e)
8	1	The Shark Bay Marine Reserve area ranks third in WA for Eastern Curlew, 13th nationally; third also in WA for the Greenshank, 11th nationally. 34 species listed in international treaties occur there - of a total of 54 in WA.	Text amended.	Yes	1 (e)
9	1	Recommendation 1 - Has to some extent been done. More information from different times of the year for example should be sought sooner rather than later.	Supports draft management plan.	No	2 (a)
10	1	Recommendations 2 and 3 - These should be implemented in parallel. It is easier to manage impacts if supportive interpretive material is available. The interpretive material could be upgraded at a later date if necessary.	Supports draft management plan.	No	2 (a)
11	1	New recommendation - "That vehicles be excluded from beaches where nesting occurs."	This will be undertaken where nesting is threatened. Supports draft management plan.	No	2 (a)
		5.5.6 DUGONGS			
1	1	Endorse recommendation 1 and 5.	Supports draft management plan.	No	2 (a)
2	1	Have reservations about the usefulness of further winter survey efforts unless there is cause to suspect a major change in numbers	Supports draft management plan. The priority is for a summer survey.	No	2 (a)
3	1	Support the recommendation for a summer dugong survey.	Supports draft management plan.	No	2 (a)
4	1	Comprehensive surveys to determine dugong distribution and habitat use should be carried out in late September and in late February.	Supports draft management plan.	No	2 (a)
5	5	Believe that the estimated dugong population numbers are actually less and a more conclusive study should be undertaken as a means to ascertain a more accurate figure.	Estimates of dugong numbers come from comprehensive scientifically valid surveys that were undertaken in 1989 and 1994.	No	2 (d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
6	1	The current marine park boundaries do not adequately protect the dugongs' habitat. New recommendation - "In order to adequately protect the habitat of this Internationally significant dugong population, the area of the marine reserves be extended to include all of the World Heritage Area."	This conflicts with gazetted position of boundary.	No	2 (e)
7	1	Recommendation 5 - add "... program for dugong."	Recommendation amended.	Yes	1 (c)
		5.5.7 BOTTLENOSE DOLPHINS			
1	1	Dolphins regularly visit resting areas in shallow water along the eastern side of Dirk Hartog Island (eg. Shag Mia). This may provide another opportunity for watching undisturbed dolphin behaviour.	No change sought.	No	2 (b)
2	1	Strongly agree with all recommendations regarding the welfare of this dolphin pod and especially agree with the recommendation to prohibit boat feeding.	Supports draft management plan.	No	2 (a)
3	1	In the light of the recent report by Wilson regarding the mortality of juvenile dolphins we question the statement that there is '...minimal disturbance to their social dynamics...' at Monkey Mia.	Text amended in light of report on Monkey Mia dolphins.	Yes	1 (a)
4	1	Recommend that dolphin feeding cease if the issue of juvenile mortality is not reversed.	Text amended as above.	Yes	1 (a)
5	1	Would like to see several 'Notice Boards' put up around Monkey Mia so that there are substantial fines for any persons outside the designated area feeding dolphins.	Supports draft management plan.	No	2 (a)
		5.5.8 WHALES			
1	1	There is potential for Shark Bay to develop a whale-watching industry. Management agencies need to anticipate such developments and be pro-active in their planning if the industry is to develop without impacting on the whale population.	No change sought.	No	2 (b)
2	1	Environmentally sustainable tourism opportunities such as whale interaction and associated tours should be encouraged by CALM. Agree with all recommendations in this section.	Supports draft management plan.	No	2 (a)
3	1	Section on whales is not satisfactory. There is no specific reference to recent aerial surveys of humpback whales or to Chittleborough's work on the Shark Bay humpback whale fishery - there is concrete evidence of an increase in the humpback whale population of which animals found in the Bay form a part; and that increase is likely to continue. At present rate, the population could be back to the level of the late 1940's (around 10 000) within a decade or less.	Text amended.	Yes	1 (e)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
4	1	The comment in the plan of the earlier presence of right whales in the Bay is unsourced. Are not even remotely as common as humpbacks in the Bay and at those levels could not be regarded as a potential for whale watching.	Text amended.	Yes	1 (e)
5	1	The reference to whale watching on line 9 of Section 5.5.8 should read Section 5.5.9.	Text amended.	Yes	1 (e)
6	1	The areas currently used by whales in winter are not included in the current reserves boundaries.	No change sought. Whales are protected under the Wildlife Conservation Act.	No	2 (b)
7	1	Endorse recommendations 1 and 4.	Supports draft management plan.	No	2 (a)
8	1	Change "1900's" to "1900s"	Text amended.	Yes	1 (e)
		5.5.9 WILDLIFE INTERACTION			
1	1	Strongly urge the guidelines for observation of dugongs be very carefully assessed.	Addressed in the plan.	No	2 (d)
		5.6 VISUAL SEASCAPE AND LANDSCAPE			
1	1	Recommendation 2 - agree with the recommendation in general. Visual impacts need to be considered when allowing new developments. However, suitable areas of land should be nominated for aesthetically unappealing developments so that such developments are not unfairly targeted.	Text amended to explain that some developments will have some impacts but where possible these impacts should be minimised.	Yes	1 (e)
		5.7 ABORIGINAL CULTURAL HERITAGE			
1	1	Suggest that in addition to the Museum of WA, CALM liaises with the Department of Aboriginal Sites in Perth concerning the project.	Text amended.	No Yes	2 (b) 1 (a)
z	1	Liaison regarding Aboriginal sites should also involve discussion with members of the local Aboriginal community.	Text amended.	Yes	1 (d)
3	1	Liaison regarding Aboriginal sites should now take place through the Division of Heritage and Culture (Aboriginal Affairs Department). Legally the administration of the Aboriginal Heritage Act 1972-80 remains with the WA Museum, however, responsibility for the day to day administrative processes relating to the protection of Aboriginal sites now is carried out by Aboriginal Affairs Department.	Text amended.	Yes	1 (e)
4	1	Recommend that any proposed developments within or adjacent to the reserves be referred to the West Australian Heritage Council for comment.	No change - developments with potential to impact on heritage sites would be referred as a matter of course.	No	2 (f)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
5	1	<p>Regard claims by Aboriginal people to traditional hunting rights at Shark Bay as highly dubious at this time for these reasons:</p> <p>a) Excavations by Bowdler so far reported indicate that dugong remains do not appear in middens at levels earlier than 1000 years BP, and their first appearance is concurrent with the appearance of glass (an indication of contact with Europeans or Indonesians). This indicates that dugong hunting began less than 1000 years ago (probably only after European contact less than 300 years ago). If this is correct dugongs were not a traditional part of aboriginal diets at Shark Bay prior to outside contact.</p> <p>b) Accounts of early European visitors to the Bay seem to be in agreement that Aboriginal residents were not seafarers. There are no reports of rafts or dugouts.</p> <p>c) Materials from which rafts or dugouts could be readily constructed are not available along the Bay shorelines.</p>	Text amended (remove the word traditional). Aboriginal people have rights to hunt under the Wildlife Conservation Act. There is no requirement to prove that this is a 'traditional' activity.	Yes	1 (e)
6	1	No recognition of "traditional" dugong hunting rights in Shark Bay should be written into legislation, or into the management plan, without concrete evidence that dugong hunting was a pre-European tradition.	Aboriginal people have rights to hunt under the Wildlife Conservation Act. There is no requirement to prove that this is a 'traditional' activity.	No	2 (f)
7	1	Claims by Aboriginals from other areas, where traditional dugong hunting did exist (eg. the far northwest) that their rights travel with them to other areas are illogical and should be rejected.	As above.	No	2 (b)
8	1	Aboriginal hunting should be restricted to use of traditional technology (rafts or dugouts propelled by human muscles, spears without metal points, and nets and cordage, if any, made of local materials).	Contrary to State legislation (see above).	No	2 (f)
9	1	When considering altering the ability of Aboriginals to catch marine wildlife, such as dugongs and turtles, within the Bay the Commission urge CALM to ensure extensive consultation with all members of the Shark Bay community occurs.	Supports draft management plan.	No	2 (a)
10	1	Change headings to: 5.7 Cultural Heritage, 5.7.1 Aboriginal Cultural Heritage, 5.7.2 Other Cultural Heritage.	No change.	No	2 (a)
11	1	Third paragraph - change to "From 6000 to 7000 BP..."	Text amended.	Yes	1 (e)
12	1	It would be appropriate for the draft plan to acknowledge the role of the Aboriginal people in the development of industries such as pearling.	Beyond the scope of the plan.	No	2 (c)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
1	1	5.8 OTHER CULTURAL HERITAGE Endorse the recommendation for urgent detailed assessment of historic sites and suggest a comprehensive inventory of all culturally significant sites within the World Heritage Area.	Supports draft management plan.	No	2 (a)
2	1	4th paragraph - Delete "before the industry was regulated"	Text amended.	Yes	1 (e)
3	1	McCarthy thesis (1990) should be referred to as it deals specifically with pearling in Shark Bay.	Considered in plan.	No	2 (d)
1	1	5.9 MARINE POLLUTION Support recommendations 8 and 9.	Supports draft management plan.	No	2 (a)
2	1	Plastic bags, a known threat to turtles, have become much more common in the Bay. Commercial establishments at Denham, Monkey Mia and Useless Loop should be encouraged to use paper bags, or even required to refrain from using plastic.	Supports draft management plan.	No	2 (a)
3	1	Monofilament line appears to be a serious problem for silver gulls. Consider an educational campaign to encourage fishers to dispose of snarls of monofilament where gulls and terns will not be exposed to it.	Supports draft management plan.	No	2 (a)
4	2	All salt ships should be required to exchange ballast water just before entering the Bay.	There is no statutory requirement for this, however, voluntary guidelines do exist. CALM does not have any statutory power to regulate ballast discharge, however, strategies highlight the need for action on this issue.	No	2 (f)
5	5	Ballast water discharge - Measures to ensure foreign organisms are not introduced into the marine environment from ballast should be given absolute priority. The present arrangement is most unsatisfactory.	New recommendation.	Yes	1 (d)
6	1	Shark Bay Salt Joint Venture is keen to consult with CALM, AQIS and other agencies with more clearly-defined power in the area of ballast water discharge, to minimise risks of pollution by exotic animals.	Supports draft management plan.	No	2 (a)
7	1	This Department agrees that the practice of multiple deballasting in different climatic zones is meritorious. However, Shark Bay Salt generally sells to companies chartering the ships and has no control and little influence over the ship owners/operators. The reference to Shark Bay Salt in the first paragraph of page 71 should therefore, be deleted.	Shark Bay Salt Joint Venture has expressed the desire to consult and liaise in regard to this issue.	No	2 (a)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
8	1	New recommendation to address the issue of ballast water around Useless Loop - "That as a matter of urgency, there should be an immediate survey of the waters in the area of the Useless Loop loading jetty for introduced ballast water species."	New recommendation.	Yes	1 (d)
9	1	The solar salt industry at Useless Loop must not be expanded and should have a use-by-date due to the threat of ballast water.	Outside the scope of the plan.	No	2 (f)
10	1	It should be made plain that it is inappropriate for vessels to discharge sewage off either Monkey Mia or Denham.	New recommendation.	Yes	1 (d)
11	1	Recommendation 8 - add "Develop and implement regulations to prevent discharge of bilge and sullage in Sanctuary and Special Purpose Zones."	New recommendation to prevent the discharge of sullage in Sanctuary, Recreation and Special Purpose Zones.	Yes	1 (d)
12	1	There are not adequate safeguards in place to protect marine values in the event of an oil spill.	Considered in the plan.	No	2 (d)
13	2	With regard to an oil spill plan specific to the Shark Bay area, we believe the Department of Transport may already have a contingency plan in place.	An oil spill plan specific to Shark Bay does not exist.	No	2 (d)
14	1	Plan does not record the fact that oil spill management facilities exist at Useless Loop.	Text amendment.	Yes	1 (e)
15	1	Recommendation 5 - should read "All new proposals to discharge toxic or hazardous substances will be disallowed, both in the marine reserve and in adjacent areas where it may impact indirectly on the reserve."	Addressed by way of environmental assessment procedures under the Environmental Protection Act.	No	2 (f)
16	1	Recommendation 10 - should read "A condition of any future coastal development be that there be no discharge of pollutants, directly or indirectly, into the marine reserve."	This is outside CALM's responsibility for management of the marine reserves (see above).	No	2 (f)
17	1	While Shark Bay Salt Joint Venture has not found it necessary to discharge bitterns into the sea since 1987, it retains the right to do so under the terms of its approved Environmental Management Program (EMP).	Text amended.	Yes	1 (e)
18	1	The potential for environmental and other damage from bitterns discharge is properly managed by existing regulatory processes.	Text amended.	Yes	1 (a)
19	1	Recommendation 6 - does not go far enough. Suggest new recommendation such as "Ensure all boat servicing facilities comply with DEP guidelines for these facilities."	Beyond the scope of the plan.	No	2 (d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
20	1	Dredging and dredge spoils should be discussed. Dredging of Denham channel and the ship berth and swinging basin at Useless Loop is necessary from time to time to ensure safe passage of ships to Shark Bay Salt's export wharf. There may also be a need to upgrade these facilities at some stage. Shark Bay Salt has an obligation under the Agreement Act to maintain these facilities (which would include dredging) and recommendations in the plan must allow for this provision in the Act.	Text and recommendation amended.	Yes	1 (a)
21	1	There must be liaison with station owners adjacent to the Park to ensure landuse practices are not impacting on the reserve, and if impacts are occurring work cooperatively to rectify the causes.	Supports draft management plan.	No	2 (a)
22	1	Recommendation 3 - Agree with this recommendation but believe the water quality monitoring program should not be detrimental to development. CALM must ensure that if a decrease in water quality is detected, the point source of the pollution must be accurately located.	Monitoring, in itself, would not be detrimental to development.	No	2 (b)
23	1	Due in particular to the low flushing rate we support the concern with regard to the potential for marine pollution.	Supports draft management plan.	No	2 (a)
24	1	Fourth paragraph - "Approximately 35 ships..." but page 101 has "about 33 ship loading..." Standardise? Or is there a difference?	Text amended.	Yes	1 (c)
25	1	Page 71, fourth paragraph - delete "artificial"	Text amended.	Yes	1 (e)
26	1	Do not support recommendation 8 - this recommendation is not achievable. A standard for sullage tanks and their fittings needs to be adopted before this proposal can be implemented. Shore based pump out facilities would also need to be established, with matching standards.	The policy of sullage tanks is an important method of reducing future pollutants. The logistics of implementing this will be determined during the life of the plan.	No	2 (d)
27	1	Recommendation 8 - the recommendation does not address the specific problems with waste disposal from cruise boats. Vessels that are mobile and conduct short tours with limited numbers produce very little waste and in these circumstances the sullage tanks are unnecessary and unreasonable. Pollution problems arise when many boats moor in one location for extended periods.	A consistent approach to <u>all</u> commercial tourist vessels will be adopted. Day cruise vessels <u>can</u> result in effluent release.	No	2 (e)
1	1	5.10 AIRCRAFT Dugongs respond to aircraft by increased surfacing and random movement if circled repeatedly at 350 m altitude. Aircraft other than those engaged in research surveys should not fly lower than this over dugongs, dolphins or whales, and should not circle repeatedly at less than 500 m.	Text amended to include reference to dugongs and dolphins.	Yes	1 (d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
		6.1 RECREATION, TOURISM AND VISITOR USE			
1	1	The camping sites in the Park and particularly those situated on the Peron Peninsula should be upgraded by installing bush toilets, rubbish bins and rubbish removal facilities.	Beyond scope of plan (NB this will be addressed in a management plan for the National Park).	No	2 (c)
2	1	Where camping facilities are approved within the Reserves confines, cooking facilities should be confined to gas, as wood fires will divide and damage vegetation cover.	Beyond scope of plan.	No	2 (c)
3	1	Last paragraph - delete "or the experience of visitors."	CALM policy.	No	2 (f)
		6.2 COMMERCIAL CONCESSIONS			
1	1	Drivers on tour buses are generally poorly informed on features and information about the Bay and are not formally trained. Drivers could benefit from training programs.	Beyond the scope of the plan.	No	2 (c)
2	1	With the increasing popularity of Shark Bay as a tourist destination more pressure will be placed on the environment. This will necessitate careful management of tourism growth and development so that the area's continuing success does not damage the natural environment on which it depends.	Supports draft management plan.	No	2 (a)
3	1	The licensing of commercial operations to facilitate better management is supported. The Tourism Commission requests that it be closely involved in the establishment of criteria/conditions and the selection process. New product that has a significant nature based tourism component as part of its concept would be particularly supported.	Supports draft management plan.	No	2 (a)
4	1	Page 78, second paragraph - change to "...will be set and adjusted from time..."	Text amended.	Yes	1 (e)
5	1	Page 78, second paragraph - change "Lesser" to "Lower"	Text amended.	Yes	1 (e)
6	1	Rules and conditions must be clear and concise to ensure there are no grey areas.	Supports draft management plan.	No	2 (a)
7	1	There is a need to set a ceiling on numbers of operators (as per whale watching at Ningaloo).	Supports draft management plan - will be done during the life of the plan.	No	2 (a)
8	1	Support a fee or charge but this must go into management of the reserves.	Supports CALM policy.	No	2 (a)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
1	1	6.3 CHARTER BOATS Strongly oppose the charging of a fee for the licensing of charter boats (and any other commercial operations) using the marine park, especially when considering the majority of charter work is carried on outside of the Park, accessible only through the Park from Denham.	Government/CALM legislation and policy.	No	2 (f)
2	1	Restrictions on number of charter boats - whilst we see the need for a limit to the number of charter vessels operating within the area, we oppose the creation of any transferable licensing system.	Supports draft management plan. Licences are not transferable.	No	2 (a)
3	1	Recommendation 10 - should include "record the monthly by-kill (as opposed to by-catch)", this will give more useful data in order to assess the impact of fishing from charter boats on the ecosystem, rather than just a target species.	Fisheries Department responsibility.	No	2 (c)
4	1	Moorings - some conscientious charter operators in Denham do have moorings placed strategically around Dirk Hartog Island to prevent damage to the environment from anchoring.	Text amended.	Yes	1 (a)
5	1	Recommendation 4 - should include "...including provision of sullage tanks and their correct use."	Supports draft management plan.	No	2 (a)
6	1	Recommendation 9 - should include imposing limits on the size of vessels. Vessel size and numbers should be limited as well as limiting the size of the dive group it can cater for at any one time.	Not considered necessary however if need is identified can be executed during the life of the plan.	No	2 (d)
7	1	Could consideration be given to a facility whereby passengers can provide confidential comments on charter operations.	Confidential comments are possible.	No	2 (b)
8	1	Charter fishing should not be permitted in the marine park.	The Fisheries Department determines if fish stocks can sustain charter fishing.	No	2 (d)
1	1	6.4 RECREATIONAL FISHING Recreational fishing makes up an important part of the attraction for visitors to the Shark Bay Marine Reserves. It is recommended that consultation takes place with tourism interests prior to classifying any areas that will preclude recreational fishing.	Supports draft management plan.	No	2 (a)
2	1	Underwater Fishing - commend the reduced bag limit on popular species of fish.	Supports draft management plan.	No	2 (a)
3	2	Spearfishing should be prohibited in the entire park (not just in Recreation Zones, Sanctuary Zones and some Special Purpose Zones).	The rationale for permitting spearfishing on snorkel is detailed in Section 6.4.	No	2 (e)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
4	1	Support the prohibition of spearfishing from charter boats.	Supports draft management plan.	No	2 (a)
5	2	Support the prohibition of spearfishing (SCUBA) in the marine reserve.	Supports draft management plan.	No	2 (a)
6	1	Spearfishing using SCUBA should be permitted - it is a discriminatory form of fish harvesting with sound conservation advantages.	Contrary to NPNCA policy.	No	2 (f)
7	1	The premise that SCUBA fishers can work in rough water as opposed to free divers that cannot is not correct as rough water generally creates turbidity which is equally restrictive to both groups.	It is generally easier to spearfish in turbid or rough surface conditions on SCUBA than snorkel.	No	2 (b)
8	1	Please provide further information as to why divers using compressed air are to be banned from taking rock lobsters.	Fisheries Department have since advised that this activity should be permitted.	Yes	1 (c)
9	1	Strongly support the prohibition of taking of rock lobsters by use of compressed air.	Fisheries Department have since advised that this activity should be permitted.	Yes	1 (c)
10	1	"The Fisheries Department is concerned that current recreational fishing levels are not sustainable and therefore changes to recreational fishing will be required." - we argue not only are they required, they are hugely overdue. The policing of fisheries regulations is completely inadequate and a substantial increase in resources is urgently required.	Supports draft management plan.	No	2 (a)
11	1	To date regulations in bag limits and other restrictions have not been sufficient to halt the decline in fish stocks, therefore with the knowledge that the numbers of anglers is going to continue to increase, much stronger action must be taken, this includes the policing of regulations.	Supports draft management plan.	No	2 (a)
12	1	Recommend that there be an assessment of areas of high fishing impact to determine habitat damage and the status of residential fish species.	Supports draft management plan.	No	2 (a)
13	1	The current greed of a small minority of anglers, who are often illegally on-selling their catch, must be stopped as a matter of urgency.	Supports draft management plan.	No	2 (a)
14	1	Does not support recreational netting other than throw netting.	One of several divergent viewpoints.	No	2 (e)
15	2	Recommend the urgent implementation of a prohibition on taking of fish by set nets.	One of several divergent viewpoints.	No	2 (e)
16	1	Recommend the prohibition of freezer units for the storage and transportation of fish in the Shark Bay World Heritage Area.	Insufficient justification for this proposal.	No	2 (f, c)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
17	1	The quoted figure of 100 tonnes of pink snapper taken by line fishers is totally unrealistic (should be lower).	Fisheries Department have estimated these amounts and believe this to be a conservative estimate.	No	2 (d)
18	1	The lack of knowledge about recreational fishing in the marine reserves is of concern.	Supports draft management plan.	No	2 (a)
19	1	Prohibited fishing from the Monkey Mia jetty needs to be better addressed than at present.	The Monkey Mia draft management plan endorsed fishing from the jetty.	No	2 (e)
20	1	Effective enforcement of regulations is essential.	Supports draft management plan.	No	2 (a)
		6.5 COLLECTING			
1	1	This section does not make a clear reference to shelling on the beach. Clarification on this might be helpful.	Considered broadly in plan.	No	2 (d)
		6.6 DIVING			
1	1	Sunday Island, in Blind Strait, is one of the better and safer dive sites in the Bay. It would be appropriate to make it a sanctuary with a dive trail for viewing of corals, sponges, tropical fish and large cod.	Text amended.	Yes	1 (d)
2	1	Due to potential damage caused by inexperienced or uncaring divers, particularly on delicate coral reef structures, we recommend that: "The impacts of diving activities be monitored and management strategies (including excluding divers) be implemented if areas are becoming damaged."	Text amended.	Yes	1 (d)
		6.7 BOATING AND SURFACE WATER SPORTS			
1	3	Support the use of Little Lagoon for water skiing due to the lack of suitable alternative areas available.	Recommendation changed to prohibit use of motorised watersport.	Yes	1 (c)
2	1	Motorised water craft on Little Lagoon should be limited to rescue vehicles on sporting day ONLY.	Recommendation amended (as above).	Yes	1 (c)
3	3	Recommendation 5 - motorised watercraft on Little Lagoon are totally incompatible with all other values that the area offers. Recommend replacing recommendation 5 with "Prohibit motorised watercraft at Little Lagoon as it is incompatible with conservation and with the passive recreation that the majority of users currently enjoy."	Recommendation amended (as above).	Yes	1 (c)
4	1	Are concerned about the damage that could be caused to the seagrass banks at Denham from power boats repeatedly accelerating out of the water.	Not within the marine reserves.	No	2 (c)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
5	1	We believe the recommendations do not go far enough in addressing the issue of anchor damage and therefore recommend: "as a matter of urgency, access the most vulnerable areas for anchor damage and implement management where necessary."	A mooring strategy will be prepared.	Yes	1 (d)
6	1	Transpose points (b) and (c).	Text amended.	Yes	1 (e)
7	1	The Henri Freycinet Harbour body of water should be left open to recreational boating. Would support an educational program to inform users of the responsibilities when using these waters or any marine reserves.	Supports draft management plan.	No	2 (a)
		7.1 COMMERCIAL FISHING			
1	1	Figure 9 - indicates fishing within Useless Loop. The cross hatching needs to be removed to the edge of the mining lease as per Useless Inlet.	Figure amended.	Yes	1 (e)
2	2	Section states that compatible fishing activities will be permitted in General Use and Special Purpose Zones but prohibited from Recreation and Sanctuary Zones. Surely any activity, provided it is compatible, should be allowed - it is a matter of deciding what is compatible.	Text amended.	Yes	1 (e)
3	1	All commercial fishing activities should be subject to full formal environmental assessment to ascertain impact on habitat and ecosystems.	Beyond scope of plan.	No	2 (c)
4	1	The information on commercial fishing is very inadequate. There are no figures for catch size, changes in catch size over time, detail on gear used, detail on species taken or on the amount of species of by-kill.	Detailed information on fisheries (including catch, gear, etc.) is provided in the Shark Bay World Heritage Area Fish Resource Draft Management Plan.	No	2 (c)
5	1	Replace recommendation with "No new licenses for commercial fisheries shall be considered until a full assessment of the environmental impacts of past and current fishing practices has been made."	Fisheries Department responsibility. Any new, or expansion of existing commercial fisheries will be sustainable and consistent with the aims of reservation, protection of the environment and use of the World Heritage Area.	No	2 (f)
6	1	Commercial fishing is not consistent with the aims of reservation under the CALM Act nor with the protection of the environmental or national estate values, and are not a reasonable use of a World Heritage property.	Sustainable commercial fishing is consistent with the aims of reservation, protection of the environment and use of the World Heritage Area.	No	2 (f)
7	1	Do not consider it possible to guarantee ecologically sustainable commercial fisheries in the marine park.	One of several divergent viewpoints.	No	2 (e)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
8	1	Sixth paragraph - change to "...in General Use Zones and some Special Purpose Zones..." The overgeneralisation of Special Purpose Zones occurs elsewhere as well. Wording along the lines of that used in the last paragraph of 7.1.4 may be more appropriate ie. "... in the General Use Zone and some Special Purpose Zones where this activity is compatible with the intention of the zone."	Text amended.	Yes	1 (c)
9	1	It would be beneficial if the boundaries of the Marine Reserves were delineated accurately using GPS technology.	New recommendation (Section 7.1.1).	Yes	1 (d)
10	1	The fishing industry requires very strict control and a non-expansion policy.	New fisheries will only be permitted if they are ecologically sustainable.	No	2 (f)
		7.1.1 TRAWLING			
1	1	The impact of trawling on bottom communities in northern Hopeless Reach needs to be thoroughly assessed.	Outside the marine reserves.	No	2 (c)
2	1	Trawlers cause a great deal of underwater noise pollution in the Bay. This could be a factor limiting use of the Bay by whales and a deterrent to development of a whale-watching industry within the Bay. Acoustic pollution should be addressed.	Text amended (Section 5.5.8) to highlight that 'underwater noise' can affect whales.	Yes	1 (a)
3	5	Commercial trawling should not be categorically excluded from Marine Parks when it can be shown that the activities do not impede on conservation values.	Existing trawling activities are permitted.	No	2 (e)
4	5	Current Marine Park boundaries coincide with "closed areas" that were established following consultation between industry and the Fisheries Department. Wording should be modified to accommodate the historical trawling activities within the Marine Park.	Text and recommendations amended.	Yes	1 (b)
5	1	The fact that trawling is allowed in the General Use Zone, which comprises the majority of the marine reserve, is a major concern. We recommend that "The impact of trawling on the marine reserve needs immediate assessment, both the trawling that is occurring inside the reserve and the trawling occurring outside the current reserve boundaries."	Considered in plan preparation.	No	2 (d)
6	4	What impact on the values of the area is caused by the disposal of scallop shells in the Marine Park and what controls are envisaged?	Text amended.	Yes	1 (e)
7	1	Suggest that special attention be given to the impact of trawling on bottom habitats.	Considered in plan preparation.	No	2 (d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
1	1	7.1.2 WETLINING Endorse recommendation 3 and 4 and the list of protected species as given on page 152.	Supports draft management plan.	No	2 (a)
2	1	Recommend that "The status of all shark species also be investigated as a matter of urgency and where necessary, species be added to the protected list.	Fisheries Department responsibility.	No	2 (c)
3	1	There is a suggestion that wetlining is restricted to the regions indicated on Figure 9.	Text amended to clarify this.	Yes	1 (e)
1	1	7.1.3 BEACH SEINE AND MESH NET FISHING This fishery would appear to be being managed at a sustainable level.	Supports draft management plan.	No	2 (a)
1	1	7.1.4 CRAB TRAPPING Support the recommendations.	Supports draft management plan.	No	2 (a)
1	1	7.1.5 ROCK OYSTERS Support the recommendations provided there is an assessment of the status of the oysters in the marine reserves as well.	Supports draft management plan (Fisheries Department issue).	No	2 (a)
1	1	7.1.6 AQUACULTURE The risks of aquaculture (pollution, disease, contamination of local gene pools with inappropriate alleles) have generally been underestimated. All proposals should be considered carefully with respect to potential for eutrophication and disease.	New recommendation to prohibit the use of non local species and stock for aquaculture.	Yes	1 (d)
2	1	Agree with all recommendations from this section but would like to note that there is a desperate need for the State Government to develop policy guidelines for assisting aquaculture proponents to access a land based site for aquaculture operations.	Supports draft management plan.	No	2 (a)
3	1	Submissions should be sought on specific applications.	Contrary to Government policy except where project is assessed by the EPA.	No	2 (f)
4	1	Aquaculture is not an appropriate landuse within a marine reserve. It is not consistent with the aims of reservation under the CALM Act. No new aquaculture operations should be permitted within the reserves, and the impact of existing operations should be monitored and management changed is necessary.	Contrary to Government/CALM policy.	No	2 (f)
5	1	Agree with the suggestion to discourage pearl and oyster transport to Shark Bay and would support a stronger recommendation along those lines.	New recommendation (see above comment 1).	Yes	1 (d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
6	1	This section is probably better placed at the end of Section 7.1 (rather than between "Crab Trapping" and "Rock Lobsters")	Text amended.	Yes	1 (e)
7	1	Page 98, first paragraph - delete "or acting as an environmental indicator for pollutants."	Text amended.	Yes	1 (e)
8	1	Combine recommendations 1 and 2 - they say essentially the same thing.	The recommendations are different.	No	2 (d)
1	1	7.1.8 COMMERCIAL AQUARIUM COLLECTION As stated little is known about the quantities taken from the marine reserves, let alone what impact it is having on the various ecosystems. Strongly recommend an immediate ban on the collecting of any aquarium species from the marine reserves.	There is insufficient justification to prohibit this activity given the limited use of the marine park for aquarium collection.	No	2 (d)
1	1	7.2 MINING The draft plan notes that several mining tenements exist over lands and waters adjacent to the marine park however the plan generally disregards the pre-existing rights and long-established operations associated with these tenements.	Beyond the scope of the plan.	No	2 (c)
2	1	By inadequately mentioning the existing mining activities and approvals, the document could raise false expectations about management of the Shark Bay area and result in unnecessary complication.	Beyond the scope of the plan.	No	2 (c)
3	1	Are totally opposed to any exploration and/or mining in the conservation estate. The areas reserved in the conservation estate are reserved for their conservation values and any concession to extractive activities is unacceptable.	Mining/exploration is subject to Government policy.	No	2 (f)
1	1	7.2.1 PETROLEUM EXPLORATION The New Horizons in Marine Management Policy should be cited on page 100 and in the bibliography.	It is mentioned in the text (reference included).	Yes	1 (e)
2	1	Petroleum exploration is not consistent with the aims of reservation under the CALM Act nor with the protection of the environmental or national estate values, and is an inappropriate use of a World Heritage property.	Subject to Government policy.	No	2 (f)
3	1	Given the potential for damage to the Area's World Heritage values from oil spills in particular, any proposals for petroleum exploration and extraction would need to be assessed specifically to determine their impacts on World Heritage values.	Supports draft management plan.	No	2 (a)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
1	1	7.2.2 SALT MINING The recommendation at the end of this section should be amended to read "Liaise with Shark Bay Salt, DRD, DEP and DOME to minimise impacts to the marine park."	Text amended.	Yes	1 (e)
2	1	Several mining tenements exist within and adjacent to the World Heritage Area and this plan ignores the fact that Shark Bay Salt has a proposal to expand its ponds further into Useless Inlet. Suggest that further expansion of this operation must impact on World Heritage values in which case CALM must act accordingly.	Outside the marine reserves.	No	2 (c)
3	1	The Department of Resources and Development is the lead agency responsible for State Agreement Acts and reference should be made to them in the text and in the recommendation.	Text amended.	Yes	1 (e)
4	1	The Shark Bay Solar Salt Industry Agreement Act 1983 confers, among other rights, the privilege to maintain a shipping channel.	Text amended.	Yes	1 (e)
5	1	Suggest that this section be modified to read: "Salt is produced from mining leases at Useless Loop and Useless Inlet, adjacent to the marine park. The salt operation is managed in accordance with the terms and provisions of the Shark Bay Solar Salt Industry Agreement Act 1983, an agreement between the State and the Shark Bay Salt joint ventures. This Agreement Act provides Shark Bay Salt with the right (and also the obligation) to carry out solar salt mining on the project site. The Act is administered by the Department of Resources Development. The Agreement Act requires Shark Bay Salt to operate in accordance with State environmental legislation and also contains provisions requiring on-going environmental investigation, monitoring and reporting for the duration of the project. Environmental reporting is on a three-year cycle of two annual interim reports and a detailed triennial report, in which past performance is evaluated and plans for the next three-year period are put forward. The reports are reviewed by the Department of Environmental Protection, the Department of Minerals and Energy and other relevant Agencies. The triennial reporting procedures allow the State or the developer to seek amendments to existing environmental programs. This normally results from a review of past results, experience and changes in technology or project structure. If the State is not satisfied with changes proposed by the developer, amendments to the program can then be required by the responsible Minister. With about 33 ships...etc."	Text amended.	Yes	1 (e)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
6	1	The solar salt industry at Useless Loop must not be expanded and should have a use-by-date within its lease arrangements purely because of the foreign ships entering into the World Heritage waters and the danger of foreign species in ballast water and pollution entering the environment.	Outside the scope of the plan.	No	2 f)
		7.2.3 GYPSUM MINING			
1	1	Transport requirements would also include planning for and easement through the François Peron National Park.	Outside the marine reserves.	No	2 (c)
2	1	First paragraph - which "National Park"?	Text amended.	Yes	1 (e)
		7.2.4 OTHER EXTRACTIVE INDUSTRIES			
1	1	The coquina shell deposit should be left undisturbed since there is insufficient research into replenishment or the effect of disturbance or any introduced infection on the stromatolite material which abuts the shell deposits.	Research is underway on the biology of <i>Fragum erugatum</i> . Mining is outside the marine reserves.	No	2 (c, f)
		8.0 COASTAL LAND USE			
1	1	Degradation of coastal sites is particularly bad at Notch Point, Gladstone and Baba Head.	Supports draft management plan.	No	2 (a)
2	1	Might be helpful at some popular camping sites to introduce "Campground Host" programs.	Supports draft management plan.	No	2 (a)
3	1	Figure 10 - a 4WD track now regularly used by traffic to Steep Point being to the south of mining leases as indicated. The track indicated through the middle of the lease across Carratti's Bar is no longer passable. See map enclosed.	Figure amended.	Yes	1 (e)
4	2	Figure 10 and the text does not exclude from Shark Bay Salt's leases the 40m wide strip of VCL recommended for vesting in the NPNCA. These leases are held by the Shark Bay joint ventures pursuant to the Agreement Act and areas within them cannot be vested in the NPNCA. The text should say this and figure 10 should be modified so that the VCL zone does not extend into the leases.	Figure and text amended to clarify situation.	Yes	2 (b)
5	1	Recommendation 3 - this recommendation is impractical where the land is included in mining leases and in the long-term plans for mining operations.	Text and recommendation amended to make it clear that these areas are not included.	Yes	1 (b)
6	1	The Tourism Commission requests to be involved with the preparation of any recreation development plans to cater for existing and future coastal use.	This is supported by recommendation 4.	No	2 (d)
7	1	Several of the proposals in the draft Roads 2020 report allow for the staged development and review of road access to the Hamelin Pool Coast.	Background on road access amended.	Yes	1 (e)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
8	1	Recommendation 2 - Road development works carried out or managed by Main Roads to service increasing road user needs in the Shark Bay area, adjacent to the Marine Reserves, will comply with existing environmental legislation and the environmental management policies and guidelines provided by the Environmental Protection Authority and the Department of Conservation and Land Management.	No change sought.	No	2 (b)
9	1	As the Shark Bay area is naturally fragile, provision of additional or upgraded access should only be contemplated in conjunction with suitable management such as litter, drainage, pedestrian traffic, erosion control, toilets and a management presence.	Supports draft management plan.	No	2 (a)
10	1	Support efforts to reduce degradation of adjacent lands that could adversely affect the marine reserve, in particular restrictions of vehicle access to beaches used as turtle and/or bird rookeries, the restriction of vehicle access where it is causing dune damage and/or erosion and damage to creek areas that could lead to soil erosion and loss of habitat.	Supports draft management plan.	No	2 (a)
1	1	8.1 WOORAMEL COAST Vehicles have damaged the algal mats at Gladstone.	Covered broadly in this section.	No	2 (d)
1	1	8.3 PERON PENINSULA COAST CALM must allow for the aquaculture industry to access land base sites on these coastlines. The adjacent waters have aquaculture potential and in general, ventures will require a land base.	CALM does not control access, except on vested conservation reserves.	No	2 (c)
1	1	8.4 NANGA COAST 4WD vehicles have not been adequately controlled at Nanga and beaches have been badly rutted, unsightly and difficult to walk on at times in the past.	Text amended.	Yes	1 (e)
1	1	8.6 DIRK HARTOG ISLAND CALM must allow for the aquaculture industry to access land base sites on these coastlines. The adjacent waters have aquaculture potential and in general, ventures will require a land base.	CALM does not control Dirk Hartog Island.	No	2 (c)
1	1	9.1 FISH AGGREGATING DEVICES AND ARTIFICIAL REEFS Establishment of FADS in seagrass areas is likely to result in barren perimeters around them through attracting grazers. FADS change the surrounding environment and their impact needs to be considered in that light.	Text amended.	Yes	1 (a)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
1	1	9.2 NAVIGATION AND OTHER MARKERS There is a need for the two marker pylons out from Monkey Mia to be lit at night.	Responsibility of Department of Transport.	No	2 (c)
1	1	9.3 MOORINGS Support recommendations 1 to 7.	Supports draft management plan.	No	2 (a)
2	1	New recommendation - "Permanent moorings be installed in areas where mooring on seagrass beds is unavoidable."	Will be addressed in development of a mooring strategy.	No	2 (d)
3	1	There is little room left at Monkey Mia for any new moorings without causing congestion and therefore presenting a potential safety hazard. Recommendation 4 should be deleted as Recommendations 2 and 5 should be sufficient to manage the situation.	Declaring a designated mooring area is necessary to manage the mooring sites. This will be considered in the development of mooring strategies.	No	2 (d)
1	1	9.4 JETTIES Jetties create problems at Shark Bay due to the tendency of accumulations of seagrass detritus to build up and decay. In general they should be avoided.	Will be considered in light of any applications for jetties.	No	2 (d)
2	1	With regard to the problems of congestion at Monkey Mia suggest that the alternative of shifting the dolphin feeding area 100 m to the east of the jetty, or as much as half km to the west, be given consideration.	Under consideration in the Monkey Mia Reserve Management Plan.	No	2 (d)
3	1	Where jetties are located, fire protection facilities must be catered for where the likelihood of refuelling occurs. This is necessary for the protection of life and property.	Responsibility of Department of Transport.	No	2 (c)
4	1	Recommendation 1 is duplicated in recommendation 2.	Amended.	Yes	1 (e)
1	1	9.5 MARINAS, GROYNES AND BREAKWATERS Consideration should be given to use of pile berths (Queensland style) in any plans for marina development since the beam problem could be alleviated, and pile berths will be less prone to accumulation of seagrass debris.	Would be considered on a case by case basis.	No	2 (d)
2	1	Marina developments are incompatible with the wilderness experience that is a major part of this World Heritage Area.	Developments would be assessed on a case by case basis.	No	2 (f)
1	1	10.0 INFORMATION, INTERPRETATION AND EDUCATION Moving the dolphin feeding area at Monkey Mia would permit redesign of the approach so that visitors entered the interaction area by way of the lecture hall where an introductory video could be shown.	Will be addressed in Monkey Mia Reserve Management Plan.	No	2 (c)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
2	1	Education of the public is more important than roads or enforcement.	Supports draft management plan.	No	2 (a)
3	1	Support the creation of a visitors education facility, subject to its proposed location.	Supports draft management plan.	No	2 (a)
4	1	Support the implementation of public information and education programs which will reduce the requirement for coercive management measures.	Supports draft management plan.	No	2 (a)
		11.0 RESEARCH AND MONITORING			
1	1	The research base for management of the Reserves is extremely thin.	Supports draft management plan.	No	2 (a)
2	1	Shark Bay is a suitable site for establishment of a west-coast equivalent of the Australian Institute of Marine Science (AIMS) in Queensland. The establishment of a major research facility of this type at Denham should be given considerations.	Supports draft management plan.	No	2 (a)
3	1	Research and monitoring programs can be extremely costly, and we assume this is the reason why external researchers are proposed; concern as to who will be conducting the research, who will be paying for the research, who will be assessing the data, and who will have access to the data.	Results of most scientific research are published.	No	2 (b)
4	1	It is very important to us as major stakeholders in Shark Bay that we have all access to all research data as it becomes available.	Published research papers are available publicly.	No	2 (b)
5	1	Support the thrust of the research and monitoring recommendations.	Supports draft management plan.	No	2 (a)
6	1	Recommend including provision for and encouragement of community monitoring and research.	Supports draft management plan.	No	2 (a)
7	1	I encourage urgent research on the impacts of activities such as coastal developments, mining, marine pollution (ballast water) and recreational and commercial fishing and review of the plan in light of the results of this research.	Supports draft management plan.	No	2 (a)
		12.1 COMMUNITY LIAISON			
1	2	Shark Bay World Heritage Property management advisory committee - the World Heritage Area includes a considerable area outside of the Marine Park and there are many other "user groups" operating within this area who would expect some input into any management advisory committee. The Trawling Industries should be represented on any Committee relating to Shark Bay.	The membership for this committee will be set out in the Commonwealth/State Agreement on management of the Shark Bay World Heritage Area.	Yes	1 (e)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
2	1	Recommendation 1 - should also include 'seeking advice from community' to facilitate a two way flow of information rather than just informing the public.	Recommendation amended.	Yes	1 (e)
3	1	Recommendation 3 - should include 'participation' of community in research programs and priorities.	Recommendation amended.	Yes	1 (d)
1	1	12.2 RESOURCING, SURVEILLANCE AND ENFORCEMENT More should be made of the potential for corporate sponsorship of certain CALM activities or programs, especially within the information, interpretation and education fields.	Considered and addressed broadly in the plan.	No	2 (d)
2	1	There is no indication of the actual manning levels needed to implement all of the recommendations within this plan. Suggest that, unless sufficient funding to support the implementation of the plan is available, and has been identified to all parties concerned, then implementation should not proceed in its present form.	Resourcing of management to implement the actions in the plan cannot be guaranteed as these are subject to resources available to the Department in the future.	No	2 (f)
3	1	Much greater emphasis must be given to enforcing regulations, particularly breaches of fisheries regulations.	Supports draft management plan.	No	2 (a)
4	1	Support the recommendations to provide adequate resources for surveillance and enforcement and that they be coordinated across agencies.	Supports draft management plan.	No	2 (a)
1	1	12.4 PLAN IMPLEMENTATION AND REVIEW The Plan states that the implementation plan will be reviewed annually but there is no mention of the duration of the implementation plan - I suggest that the implementation plan be over a three year period, with annual reviews.	This is an operational issue which will be considered by the manager of the marine reserves.	No	2 (d)
2	1	The priority ranking of the Section 5.5.5 Birds recommendations is inappropriate (they should be given a high priority ranking).	Priority rankings are a guide only and can change as circumstance change.	No	2 (d)
3	1	There is no recommendation for Section 5.8 Other Cultural Heritage under the High Priority list. The preparation of an inventory that identifies significant cultural heritage and develops appropriate management plans for those sites both in and adjacent to the marine reserves should be a high priority.	As above.	No	2 (d)
4	1	Section 5.8 Other Cultural Heritage - the on-going physical conservation of significant sites should be a medium priority (notwithstanding that conservation of some sites may be a high priority).	The priority table is a general indication only and would be subject to change where applicable.	No	2 (d)
1	1	REFERENCES Change "Lentanton" to "Lenanton".	Text amended.	Yes	1 (e)