

**WETLANDS CONSERVATION POLICY
FOR WESTERN AUSTRALIA**

REVIEW OF PUBLIC SUBMISSIONS

1997

Department of Conservation and Land Management

WETLANDS CONSERVATION POLICY FOR WESTERN AUSTRALIA

REVIEW OF PUBLIC SUBMISSIONS

TO THE DRAFT POLICY RELEASED IN DECEMBER 1992

1. INTRODUCTION

In December 1992, a draft **Wetland Conservation Policy for Western Australia**, prepared through the Integrated Catchment Management Coordinating Group by the Department of Conservation and Land Management (CALM) in consultation with a range of State Government agencies, was released for public comment by the then Minister for the Environment.

Comments on the draft were to be forwarded to the Minister's office by 26 March 1993.

In February 1993 a change of Government occurred and on 29 July the new Minister for the Environment requested CALM to *inter alia* prepare a review of public submissions on the policy document. This document presents that review.

This review has been published to accompany the final **Wetlands Conservation Policy for Western Australia** released by the Government in August 1997.

2. SUBMISSIONS RECEIVED

Twenty-two submissions were received from State Government agencies, Local Government, community conservation organisations and private individuals. These organisations and individuals are listed in Appendix 1.

The average number of comments per submission was 11.5 (median 9) and the range 3 to 28. The total number of comments was 254. Two submissions (numbers 1 & 4) contained identical comments.

3. METHODOLOGY

Following receipt by CALM, the twenty-two public submissions were numbered in chronological order. The comments contained in each submission were then numbered sequentially. Comment 4.28, for example, is the twenty-eighth comment in the fourth submission.

The 254 comments were then arranged into the same sequence as the matters they referred to in the draft policy document. In many cases, comments have been quoted *verbatim*, or nearly so. Where it was considered necessary to condense a comment, either because of its original length or in order to facilitate the amalgamation of several comments making the same point, care was taken to retain the comment's original meaning.

Following the above process, responses were prepared for most comments. The general approach followed was to adopt, either in full or in part, comments considered to add usefully to the policy document and the achievement of its objectives. Where comments have not been adopted, reasons have been given. A number of comments, mostly of a general and supportive nature, did not require responses.

The 254 comments and responses appear below. All references in the **comments** are to the draft Wetland Conservation Policy for WA released in 1992. References in the **responses** are to the final Policy released in 1997. For a list of acronyms and the full titles of the organisations they refer to see Appendix 2.

It should be noted that, while it was not deemed appropriate for CALM to make a submission, given its role in drafting the policy document, the Department has provided additional comment on the policy to the Minister for the Environment, aimed at facilitating its adoption and implementation.

4. COMMENTS AND RESPONSES

4.1 GENERAL COMMENTS CONCERNING THE DRAFT POLICY DOCUMENT

The following general comments do not require responses.

Comment 1.1 We welcome the release of the policy for public comment.

Comments 2.1, 4.1, 12.6 & 21.1 This policy is an important step forward in conserving, managing and rehabilitating WA's wetlands.

Comment 1.2 We support the Statement of Policy and Strategy for Implementation.

Comment 3.1 We are pleased that this policy has been produced. The policy will help make possible the conservation and rehabilitation of the wetlands of Western Australia.

Comment 8.1 ICMCG and CALM are to be commended for their vision in aiming high and developing a most comprehensive Draft Policy, which gives clear direction by way of the strategies it contains.

Comment 8.2 We fully support the contents of the Draft Policy and could not identify any issues which have not been addressed.

Comment 9.1 The draft document appears to contain the essential elements to formulate a good policy.

Comment 10.1 It is a very good policy and if adopted and quickly acted upon it should provide good protection for our wetlands.

Comment 11.1 We commend the previous government for its identification of the issues involved for the preservation of our wetlands and agree with its draft wetland conservation policy and strategy for implementation.

Comment 14.21 We regard the Wetlands Policy as a big step forward.

Comment 17.1 This is a very valuable document and we have few comments beyond expressing the hope that it will soon be accepted and implemented.

Comment 19.1 We support the broad thrust of this policy.

Comment 22.1 We generally support the content of the draft policy.

4.2 COMMENTS CONCERNING THE PREFACE OF THE DRAFT POLICY DOCUMENT

The following comments do not require responses other than to say that the Government will proceed with the development and implementation of the proposed *Program of Action* following establishment of the Wetlands Coordinating Committee under the Policy.

Comment 1.15 We hope this Policy will be adopted by Government without delay and the *Program of Action* will be developed as a matter of urgency.

Comments 2.2, 4.2 & 11.6 We are pleased a *Program of Action* will be developed. In the past, too many policies and strategies have been ignored once completed, e.g. State Conservation Strategy.

Comments 2.27, 3.14, 4.27, 11.7, 13.17 & 21.2 Development of a *Program of Action* should begin without delay. Too much of our wetland heritage has been lost and much of what remains is threatened. Immediate action is therefore required.

Comments 2.28, 3.14 & 4.28 Please take urgent action to implement this policy.

Comment 13.3 I hope the *Program of Action* will be similarly comprehensive, achievable and not take too long to be implemented.

Comment 14.20 The *Program of Action* should be regarded as the most important part of the Wetland Policy.

4.3 COMMENTS CONCERNING THE DEFINITION OF WETLANDS

Comments 2.3 & 4.3 The definition is acceptable and similar to that used in other States and internationally.

Comment 13.4 The definition is clear and unambiguous and covers the breadth of wetland types that exists. It is important that all types are conserved as they are all necessary in achieving Primary Objectives 2, 3 and 4.

Comment 1.3 We agree with the definition. However, we would like the definition to make specific reference to "damplands".

Response: see response to Comment 22.2 below.

Comment 14.1 We suggest that grey areas be included in the definition by the term "damplands" and/or presence of wetland vegetation, melaleucas or samphire.

Response: See response to Comment 22.2 below. It is generally accepted that the term wetlands includes their vegetation, e.g. melaleucas and samphire.

Comment 22.2 The definition should also include damplands, i.e. "wetlands are areas of permanent or periodic inundation or waterlogging; whether natural or otherwise etc".

Response: It has been made clear that damplands are wetlands by including them in the list of examples in the "Scope of Policy" section. The word "waterlogging" is not favoured due to its wider meaning and its negative connotations, particularly to people on the land.

Comment 12.13 Seasonal wetlands also need protection.

Response: Agreed. For this reason, seasonal wetlands are covered by the Policy.

Comment 7.1 All plants and animals are "water-dependent".

Response: Agreed. The term "water-dependent" is not used in the final Policy.

Comment 15.1 The definition is too broad as it effectively covers all wetlands in the State and would include sites that are environmentally and ecologically unimportant and unworthy of preservation. This will affect the credibility of the policy, particularly in relation to implications for land owners and developers. Also, effective implementation of the policy would be likely to require unrealistic resource allocations.

Response: The definition intentionally covers all wetlands in order that the Government may indicate its general intentions regarding the State's entire "wetland resource". The final Policy does not, however, state or imply that every wetland, regardless of importance, will be conserved. Note also that the first Principal Objective has been modified in the final document to read as follows: "... to prevent the further loss or degradation of valuable wetlands ... etc." (see response to Comment 15.3 in Section 4.4 below).

Comment 15.2 It is not clear how this policy relates to the EPA "Lakes Policy" which has already established those wetlands to be retained and managed on the Swan Coastal Plain. The definition of a "wetland" in this policy is much broader than the approach taken by the EPA in the "Lakes Policy". This raises the question of whether additional water bodies could be identified on the Swan Coastal Plain for preservation by a separate government agency requiring land owners and developers to approach two separate government agencies. This type of administrative arrangement which creates duplication should be avoided.

Response: The Wetlands Conservation Policy for Western Australia is an "umbrella" policy concerning all types of wetlands throughout the State. It is a statement of Government intent; it is not law.

The Swan Coastal Plain Lakes Environmental Protection Policy (EPP) is a legal document prepared under the Environmental Protection Act. It prevents and/or restricts certain activities which may impact upon certain specified "lakes" on the Swan Coastal Plain. The EPP applies only to these "lakes"; it does not apply to other wetlands, of which there are many. It is conceivable that a similar EPP including some or all of these other Swan Coastal Plain wetlands could be developed in the future. This could be administered in such a way as to avoid duplication.

Comment 17.2 We are pleased to see the emphasis on the Ramsar definition. Our preference would have been to present the Ramsar definition first, and then narrow the definition under "comment" to exclude the marine areas from the material of the policy for the reason given. This is because the Ramsar definition is increasingly accepted both locally and internationally; it emphasises the continuity of wetland systems from catchments through lakes and rivers to estuaries and nearshore regions and their interdependence at least in a downstream direction; and reserves and parks in all areas, including marine, are vested in the NPNCA and managed by CALM.

Response: The Ramsar definition of wetlands has been adopted in the final Policy due to its growing recognition and acceptance. Shallow marine areas, estuaries and rivers are within the Ramsar definition and therefore the Scope of the final Policy, however their needs will be addressed primarily through other programs (see response to Comment 17.3 below).

Comment 17.3 On page 5 rivers are removed from the policy. It would be more consistent to remove them, along with marine areas, on page 3 (wetland definition) after including both in the formal definition.

Response: The statement has been modified to make it clear that Western Australia's rivers, estuaries and shallow marine areas are within the Scope of Policy, however their specific conservation needs will be addressed primarily through other government programs (rather than the Strategy for Implementation) due to the special attributes and values of those environments.

4.4 COMMENTS CONCERNING THE DRAFT STATEMENT OF POLICY

Comment 1.4 We endorse the Statement of Policy and the conservation objectives in the State Conservation Strategy for Western Australia.

Comment 13.1 I am pleased with the policy - it gives a comprehensive definition, clearly and comprehensively states reasons for wetland conservation and then states objectives by which conservation success can be measured. The objectives cover the necessary actions well.

Comment 9.4 The value of wetlands as an indicator of environmental effects of landuses in their catchments could be included in the Policy preamble.

Response: Although wetlands may be considered "indicators", the statement is not considered sufficiently important to warrant addition to the already-lengthy Statement of Policy.

Comment 20.1 We suggest inclusion of the following in the preamble to the Statement of Policy:

- i) provide nursery habitat for many fish species including some of commercial importance;
- ii) act as biological filters for various waterway pollutants;
- iii) are (rather than "may be") of international significance, particularly as habitat for migratory bird species (international treaties prohibit the destruction of any wetland with migratory bird significance).

Response:

- i) the value of wetlands as "fish nurseries" is referred to in the Statement of Policy;
- ii) the words "biological filtration" have been added to the list of "other significant values" in the Statement of Policy;
- iii) the words "may be" have been replaced with "are, in some cases".

Comment 14.2 Wetlands also play an important role in the reduction of nutrients to inland waterways.

Response: Agreed. See response ii) to Comment 20.1 above.

Comment 6.1 I suggest you modify the Policy by inserting the word "any", as follows: ".. wetlands .. form one of the habitats that will be most affected by any climate change".

Response: Agree with the apparent intent of this comment. However, will insert "possible" rather than "any" as the intent is thereby made clearer and "possible" has been used in action items 3.10, 3.11, 4.10 & 4.11.

Comment 16.1 & 21.3 We support the five Principal Objectives of the draft policy (Comment 21.3 - and believe if implemented they will provide a good foundation for wetland protection).

Comment 18.5 The policy document should list out separately each of the five Principal Objectives as well as having them in the body of the text.

Response: The five Principal Objectives are listed separately, as well as "in the body of the text".

Comments 2.4 & 4.4 The Principal Objectives should be preceded by a statement (example given) about wetland occurrence and loss in WA.

Response: Although such a statement could usefully be made, it is not considered sufficiently important to warrant its inclusion in the already-lengthy Statement of Policy. Note that the Statement of Policy gives a comprehensive indication of the values of wetlands and refers to their loss and diminution.

Comment 5.4 It is important that the policy should recognise that some mechanism needs to be developed for evaluating and prioritising wetlands for conservation. Not all lowlying land, with a pool of water and a few water plants, should be selected for conservation. Selectivity is needed. Without this, the policy will be resisted, and circumvented where possible, and the worthy Objectives compromised.

Response: see response to Comment 15.3 below.

Comment 15.3 The first Primary Objective which states in part "to prevent the further loss of wetland area" is considered unrealistic to achieve particularly within the context of the proposed definition of "wetlands". This will affect the credibility of the policy and place unrealistic restrictions on the development of land. Emphasis should be placed on the protection of "valuable" wetlands and on "discouraging" the general loss of wetland areas.

Response: Agreed, in part. The words "of wetland area" have been removed from, and the word "conservation" added to, Primary Objective 1 of the final Policy. This Objective now becomes "To prevent the further loss or degradation of valuable wetlands and wetland types, and promote wetland conservation, creation and restoration".

Comment 14.3 I hope that wetlands presently in private hands and not in conservation reserves (Principal Objective 2) will be recognised as equally important as set out under Principal Objective 1.

Response: In terms of their importance, the Policy does not distinguish between wetlands "in private hands" and wetlands in conservation reserves.

Comment 9.6 The second Principal Objective should more clearly indicate that it includes those neighbouring flora and fauna associations that, in part, depend on wetlands for food and other benefits and vice versa for groundwater quality protection.

Response: Agreed, in part. Principal Objective 2 has been modified by the insertion of the words "and associated flora and fauna" after "major wetland types and key wildlife habitats". However, it is not considered necessary to indicate in this Objective that the quality (and quantity) of their groundwater inputs (where these are significant) needs to be protected in order for wetlands to be conserved.

4.5 COMMENTS CONCERNING THE DRAFT STRATEGY FOR IMPLEMENTATION

Comment 1.5 We support the Strategy as outlined.

Comment 22.3 A key to the implementation of the policy is the establishment of the Wetlands Advisory Committee; this should therefore be established as a matter of priority.

Response: Agreed. It is one of the first actions to be taken.

Comment 22.4 As the proposed Wetlands Advisory Committee would have the task of coordinating the roles of other agencies and overseeing the implementation of this policy, it may be more appropriately named the Wetland Coordination Committee.

Response: Agreed that the Committee's role should also include coordinating the implementation of the Policy. The wording of the final Policy has been modified accordingly (see also the response to Comment 15.4 below).

The proposed committee has been re-named the "Wetlands Coordinating Committee" in order to emphasise the ongoing nature of its coordinating role.

Comments 11.4, 2.8, 3.6, 4.8 & 1.6. The proposed Wetlands Advisory Committee should have full representation from the voluntary conservation movement (Comment 11.4); have substantial community representation (2.8, 3.6, 4.8); include members of the voluntary conservation movement with specific knowledge about wetlands (1.6).

Response: see response to Comment 15.8 below.

Comment 5.1 The proposed involvement of community groups will be crucial.

Response: see response to Comment 15.8 below.

Comment 19.7 It is essential that a strong grouping of community/government people are seconded to the Wetland Advisory Committee.

Response: see response to Comment 15.8 below.

Comment 13.5 I suggest a selection of representatives from State, Commonwealth and Local Government, landholders, the private sector and conservation organisations be included in the Wetlands Advisory Committee, with strong representation of community groups.

Response: see response to Comment 15.8 below.

Comment 8.6 The proposed Wetlands Advisory Committee should include representation from Local and State Government, community interest groups and tertiary institutions.

Response: see response to Comment 15.8 below.

Comment 8.7 Representation of Local Government, preferably through the Western Australian Municipal Association, is of great importance given that many wetlands are under the care and control of Local Government Authorities.

Response: see response to Comment 15.8 below.

Comment 22.5 The Committee should include representatives of CALM, EPA (DEP), WAWA, WWC, DPUD and two community representatives (e.g. Wetlands Conservation Society and Local Government Association).

Response: see response to Comment 15.8 below.

Comment 13.7 Throughout the Strategy the primary responsibility rests with EPA (DEP) and CALM. However, WAWA should also be closely involved and should provide funding and other resources needed to implement the Strategy.

Response: see response to Comment 15.8 below concerning "close involvement" and Section 4.5.1 (Comments 2.6, 3.3, 4.6, 10.2) concerning funding and other resources.

Comment 15.8 It is important that the setting of priorities for those aspects of the policy that have land use planning implications (i.e. the preparation of inventories and management plans) relates to areas that

are subject to development pressures and/or strategic planning. Regular liaison with DPUD is considered important to assist in determining these priorities.

Response: The final Policy indicates that the Wetlands Coordinating Committee will include representatives of CALM, AgWA, DEP, WRC, MiP, local government, two representatives of the voluntary conservation movement with specific knowledge about wetlands and their biota and a recognised, non-government, wetland scientist.

Comment 18.4 The Wetlands Advisory Committee should operate as a State Government Technical Advisory Group and should be chaired by a serving or recently retired member of CALM or WAWRC.

Response: The Committee will operate as a State Government coordinating committee. See response to Comment 8.8 below concerning chairmanship.

Comment 22.6 The Committee should be chaired by a senior officer of CALM, the Director of Nature Conservation being the obvious choice.

Response: see response to Comment 8.8 below.

Comment 8.8 In order to keep the Chair of the Wetlands Advisory Committee as neutral as possible, the position should be filled by a prominent member of the community with particular skills, knowledge and interest in wetland issues.

Response: The Committee will be chaired by the Director of Nature Conservation (CALM), as this is the most senior position in State Government with nature conservation (including wetlands) as its primary responsibility.

Comment 22.7 The Committee should be responsible to the NPNCA and the WAWRC and have an advisory role to ICMCG.

Response: see response to Comment 2.9 *et al* below.

Comments 2.9, 3.5, 4.9 & 13.6 The Committee should report directly to the Minister for Environment (Comment 13.6) and not to CALM (Comments 2.9, 3.5 & 4.9).

Response: The proposed Wetlands Coordinating Committee will report directly to the Minister for the Environment.

Comment 15.4 The relationship between the proposed Wetland Unit, Wetland Advisory Unit and Wetland Education Unit is unclear. The roles of each appear to overlap.

Response: The draft Policy referred to a proposed "Wetlands Advisory Committee" (now renamed the Wetlands Coordinating Committee), a proposed wetland management "advisory unit" and a proposed wetland "education unit".

The proposal to establish an education unit in CALM has been revised in favour of a coordinated, multi-agency approach to the development of educational materials and activity programs.

The role of the Coordinating Committee will be to coordinate the implementation of the Wetlands Policy (see "Strategy for Implementation" in the final Policy).

The objective is to provide practical wetland management advice to landowners and others requiring it, through an enhanced advisory capacity (see action item 1.16 of the final Policy). However, the draft Policy also suggested that an advisory unit would "oversee the implementation of this Policy". In order to clearly distinguish between the role of the Coordinating Committee and wetland management advisory staff, the words "oversee the implementation of this Policy" have been deleted from action item 1.16 in the final Policy and appropriate words have been added to the description of the Coordinating Committee's role.

Comment 13.2 The Strategies for achieving the Primary Objectives have been well itemised and are quite comprehensive.

Comment 16.3 Establishment of the Wetlands Unit and the Wetland Management Committee is endorsed, and (this organisation) is willing to support the function of both.

Comment 19.6 The priorities of implementation need to be firstly an inventory of wetlands followed by mapping of position and area.

Response: see response to Comment 18.1 below.

Comment 10.4 Rehabilitation of sick and injured waterbirds (action item 4.8), control of botulism (action item 4.9), ensuring substantial natural bushland zones around wetlands (action item 1.5) and recovery plans for threatened wetland species (action item 3.5) are among the really important features of the policy.

Response: see response to Comment 18.1 below.

Comment 18.1 We do not oppose any of the action items listed under the five Primary Objectives. We believe that to implement the policy priority should be given to action items 1.7 (inventories), 1.9 (evaluation), 2.2 (review of types), 2.14 (Wetland Conservation Trust) and 3.4 (research).

Response: Priorities for implementation will be determined by the Wetlands Coordinating Committee following its formation.

Comment 12.17 More resources are needed to protect our dwindling waterways from human impact.

Response: see response to Comment 18.6 below.

Comment 18.6 Financing and staffing requirements for each of the major items should be covered.

Response: These matters will be addressed through normal Government budget processes.

Comments 2.6, 3.3 & 4.6 As the WA Water Authority is a major exploiter of groundwater and thus impacts on wetlands, they should provide some of the funding and resources necessary for wetland management and restoration.

Response: The WRC (formally WAWA) already provides most of State Government's resources for wetland classification, mapping, inventory, evaluation and research. The suggestion that the WRC and/or the Water Corporation also provide resources for wetland management and restoration will be referred to the Wetlands Coordinating Committee and to the WRC and the Water Corporation.

Comment 18.7 Interaction with existing legislation (e.g. Mining Act, Petroleum Acts, Swan Coastal Plain Lakes EPP) and interagency agreements should be stipulated.

Response: The final Policy states that "It is the intention of this policy to encourage the conservation and proper management of wetlands and to encourage development to be consistent with the objectives of the policy. However, where implementation of this policy conflicts with other proposals, that conflict will be resolved through the normal processes of State Government". Given this statement, it is not considered necessary to stipulate how this Policy may interact with each of the items listed in the comment.

Comment 14.5 If conflicts between conservation and development are to be resolved "through the normal processes of State Government" (page 5) there will be few wetlands left to be managed.

Response: Strong and effective public support for wetland conservation will ensure that this is not the case.

Comment 5.2 Wetland values should be treated as functional elements of an integrated ecosystem and must be built into integrated environmental programs, not treated as an "optional extra".

Response: Agreed in principle. The trend and policy in government is to coordinate environmental programs, with integration where this is considered most efficient.

Comment 14.4 River systems should not be left out of wetland policies.

Response: See response to Comment 17.3 in Section 4.3 above.

Comment 20.3 We believe that a statement should be made which clearly includes rivers and estuaries in this policy.

Response: See response to Comment 17.3 in Section 4.3 above.

Comment 16.2 We advocate clarification of the administrative responsibility for the various aspects of wetland policy formulation, research, management responsibility and management advice at State, Local Government and community levels. It is important to note that the allocation of responsibility for the management of rivers is similarly unclear. In our view both wetland and river management are part of the much larger issue of management of the State's natural resources, and should be dealt with in an integrated, coherent fashion, and funded appropriately.

Response: The final Policy indicates which State Government agencies have primary responsibility for achievement of each of the action items listed under the five primary objectives of the Policy. Further information is provided in a new Section in the final Policy entitled "Role of Government Agencies in the Conservation of Wetlands".

Comment 9.3 The implementation section should include a list of the types of landuses that are potentially harmful to the wetland ecosystems such as direct channelled urban and industrial runoff, road construction, clearing of vegetation for parks etc.

Response: It is not considered necessary for the purposes of this Policy to include such a list, which would be lengthy. Lists of this type are available from various sources and will no doubt be referred to by the Wetlands Coordinating Committee when it goes about establishing its priority tasks.

4.5.1 COMMENTS CONCERNING ACTION ITEMS LISTED UNDER THE 1st PRIMARY OBJECTIVE

Comment 10.3 Cooperation and coordination between Government Departments must be pursued and surely can be achieved with little expense.

Response: see response to Comment 21.4 below.

Comment 14.16 More cooperation between DPUD executives and conservation departments is essential if those valuable resources (estuaries) are not to be destroyed for urban development.

Response: see response to Comment 21.4 below.

Comment 12.15 All government departments have to work together to preserve wetland habitats and rehabilitate and purchase more for A Class nature reserves.

Response: see response to Comment 21.4 below.

Comment 21.4 We believe it essential that effective mechanisms be developed to ensure cooperation and coordination between Government sectors.

Response: Agreed. The Wetlands Coordinating Committee is intended to be the principal "effective mechanism" for cooperation and coordination between Government agencies with respect to wetland issues.

Comment 19.2 As part of the ongoing planning of rural and near urban developments, full consultation with relevant authorities is needed to initially identify areas suitable for reservation. This practice is actively pursued by the Planning Branch in DOLA.

Response: The fact that DOLA is active in this area will be brought to the attention of the Wetlands Coordinating Committee.

Comment 12.18 Developers should have to incorporate every wetland area into their schemes and give 20% of their profits for resumption and protection of bush and wetlands.

Response: The suggestion relates principally to the implementation of action item 1.3 (land and water-use planning procedures) and will therefore be referred to the Wetlands Coordinating Committee for consideration.

Comment 22.8 Suggest modify action item 1.3 to "ensure land and water-use planning procedures recognise wetlands and promote their conservation etc".

Response: Agreed. The suggested modification has been made.

Comment 12.2 Wetland destruction, degradation and pollution continues even though we have already lost 80% of our wetlands.

Response: see response to Comment 10.5 below.

Comment 12.12 Areas like Port Kennedy and Secret Harbour should be totally protected, not destroyed or fragmented by developers.

Response: see response to Comment 10.5 below.

Comment 14.17 Creery wetlands and Port Bouvard (Dawesville Channel development) are typical examples of fast tracking to the detriment of our few wetlands.

Response: see response to Comment 10.5 below.

Comment 10.5 I hope you will ensure that general government policy doesn't threaten our wetlands, e.g. development shouldn't go ahead at Port Kennedy and Secret Harbour.

Response: This Policy aims to prevent the further loss of valuable wetlands, though it is recognised that for historical reasons this will not be achieved immediately.

Comment 21.5 Action items 1.3 (planning procedures), 1.4 (EPA assessment) & 1.5 (buffers – 1.9 in the final document) are very important especially for areas like Busselton where very significant wetlands are under increasing threat from urban expansion and tourism developments.

Response: Agreed.

Comment 7.2 Tackling the issues of land (farm) drainage and groundwater pumping to beat salinity/waterlogging is crucial. This should be explicitly stated.

Response: see response to Comment 12.4 below.

Comment 12.9B Water conservation, an end to urban sprawl and zero population growth are needed to stop the degradation of waterways.

Response: see response to Comment 12.4 below.

Comment 12.4 We should reduce unsustainable farming practices, reduce livestock operations, introduce zero population growth and drastically reduce immigration, the most damaging cause of environmental (including wetland) destruction.

Response: Concerns about specific degrading influences should be directed to the EPA, as provided for under existing legislation and emphasised under action item 1.4. The above comments will also be brought to the Wetlands Coordinating Committee for information and possible follow up.

Comment 12.9A Water Authority operations should be re-evaluated. Their staff are behind the times and responsible for the most appalling environmental vandalism (North Dandalup Dam and Woodlupine Brook realignment given as examples).

Response: These comments should be directed to the Water Corporation in the first instance. Also see response to Comment 12.4 above.

Comment 12.10 The Environmental Protection Authority needs a massive injection of funds and more staff to cope with wetland protection.

Response: see response to Comment 18.6 above.

Comment 19.3 The provision of guidelines to identify "buffers" between proposed developments and wetlands should be a high priority. The guidelines should be then communicated to groups such as the Planning Branch in DOLA.

Response: see response to Comment 1.8 below.

Comment 1.8 Particular consideration should be given to linking of wetland habitats and to wetlands adjacent to upland habitat.

Response: Agreed. This comment will be referred to the Wetlands Coordinating Committee for appropriate action.

Comment 9.7 The inclusion of buffers needs careful consideration in regard to on ground management and future planning interpretations (an example involving bauxite mining in State Forest is given).

Response: see response to Comment 12.7 below.

Comment 12.7 No developments should be within a 1 km radius of wetland areas to prevent runoff and human and domestic predator impacts.

Response: This suggestion will be referred to the agencies responsible for development of the buffer guidelines, following development of the Policy action plan.

Comment 14.6 Creery Wetlands near Mandurah are a classic case of the need for buffer areas.

Response: The Creery Wetlands case also raises the question of wetland boundary definition.

Comment 6.3 A stronger objective with regard to catchment management is possibly required somewhere in the document. A wetland with a fringing buffer is better than nothing, but will be even better if river/creek vegetation is also intact upstream.

Response: It is considered that action item 1.3 adequately deals with the need to consider catchments in conserving wetlands.

Comment 14.7 Action items 1.6-1.13 are strongly supported. The recent 7 volumes on "Wetlands of the Swan Coastal Plain" (WAWA) provide an excellent example of action on these.

Comment 9.8 Wetland classifications and inventories should be standardised to ensure the information can be used to discuss planning and management options for wetlands at local, regional and State scales.

Response: Agreed. This is specifically referred to under action items 1.10 & 1.11.

Comment 22.9 WAWA (now WRC) is the State custodian of digital wetland mapping information. This is a valuable resource for better planning and management and provides a useful foundation for a State wetland inventory.

Response: Agreed. WRC will be represented on the Wetlands Coordinating Committee and will no doubt bring this information to the Committee's attention.

Comment 22.14 The policy should include recognition of WAWA's contribution to wetland conservation through its water resources management role, particularly through its work in wetland mapping, classification and evaluation and water resource planning.

Response: Appropriate modifications have been made to the Policy.

Comment 10.2 As a lot of the work would be funded by the Water Authority, I trust any cuts to that Department would not affect wetland mapping, classification and evaluation and wetland management projects.

Response: This concern will be referred to the Wetlands Coordinating Committee and to the WRC.

Comment 9.5 Given limited research resources, in the identification of wetlands it may be best to give priority to areas where wetland damage has probably been greatest.

Response: see response to Comment 19.4 below.

Comment 19.4 The resources of the Remote Sensing Applications Centre in DOLA are set up specifically to assist in the monitoring and identification of wetlands. Comparative modelling and inventory is needed on a catchment and regional basis.

Response: This comment will be referred to the Wetlands Coordinating Committee for information.

Comment 21.6 Development of a Statewide evaluation process which incorporates all wetland values is vital.

Response: Agreed.

Comment 16.4 The policy needs to account for economic factors, and to recognise that wetlands may have significant economic values, e.g. minerals. Action item 1.9 (1.13 in the final document) refers to conservation values - knowledge of other values is also important, so that the best decisions on management and conservation can be made.

Response: Agreed. The word "conservation" has been deleted from action item 1.13, thus removing this limitation.

Comment 22.10 It is suggested that a wetland evaluation committee or working group be established to continue this valuable work (wetland evaluation) beyond the Wedge Island to Mandurah area.

Response: This suggestion will be referred to the Wetlands Coordinating Committee.

Comment 22.13 The policy should include recognition of a hierarchy of significance of wetlands. Wetlands should be identified on the basis of their international, state, regional, district and local significance.

Response: The Policy recognises that wetlands vary in importance. The specific hierarchy of significance proposed will be referred to the Wetlands Coordinating Committee for consideration.

Comment 16.3 Establishment of the Wetlands Unit (wetland management advisory unit) and the Wetland Management Committee (Wetlands Coordinating Committee) is endorsed, and we are willing to support the function of both.

Comment 8.3 The establishment of a (wetland management advisory unit) to provide advice, information and assistance to the community in managing wetlands is supported.

The wording of action item 1.16 has been modified to emphasise the role in providing practical wetland management advice to landowners and others requiring this type of advice (see also response to Comments 22.4 and 15.4 in Section 4.5 above).

Comment 8.4 If the (wetland management advisory unit) is to be multi-agency it seems appropriate that it be comprised of representation from EPA, CALM and WRC as these agencies deal practically with wetland protection and management on a day-to-day basis.

Response: Given the proposed role in providing practical management advice to landowners and others seeking such advice, and the breadth of relevant expertise existing in the proposed host agency, it is not considered necessary for a multi-agency advisory capacity to be established. The advisory staff will, however, interact with staff of other agencies as appropriate.

Comment 8.5 Since CALM has primary responsibility for achieving the objectives of the Draft Policy, particularly Primary Objective 5, the (wetland management advisory unit) should be located in that Department.

Response: see response to Comment 22.11 below.

Comment 18.3 The proposed (wetland management advisory unit) should be based in CALM to gain from that organization's scientific and management expertise.

Response: see response to Comment 22.11 below.

Comment 22.11 The (wetland management advisory unit) should be located in CALM and be adequately resourced.

Response: The Policy has been modified to indicate that the proposed wetland management advisory capacity (action item 1.16) will be located in CALM, for the reasons given in the response to Comment 8.4 above.

Comment 15.5 The information and advice proposed in Actions 1.12 and 1.13 should also be made available to the general public, not just land owner groups.

Response: Emphasis was placed on land owners for obvious reasons. However, it is certainly intended that the information and advice referred to will be made available to the general public.

Comment 18.8 Action item 1.12 should be amended to read "... groups (e.g. Land Conservation District Committees, Integrated Catchment Management Committees)."

Response: The Policy has been amended to refer to "Land Conservation District Committees". However, "Integrated Catchment Management Committees" have not be added as one example is considered adequate to illustrate the type of group being referred to.

Comment 19.5 DOLA has a wide range of natural resource data to assist in technical brochures and displays.

Response: This comment will be referred to the Wetlands Coordinating Committee for information.

Comment 20.2 To reflect the heritage value of wetlands we recommend the words "heritage value" be inserted after "wetland conservation" in action item 1.13 (1.17 in the final document).

Response: The words "wetland values" have been inserted after "concerning", in action item 1.17. Provision will thereby be made for the development of informative products on a wide range of wetland values, including heritage values.

Comment 13.9 I would especially like to see a strategy to identify areas where wetlands have been lost and a re-creation program developed to restore some to the area.

Response: see response to Comment 1.7 *et al* below.

Comment 9.10 Action item 1.16 (1.21 in the final document) would seem to have high priority in areas now devoid of original wetlands, e.g. sections of the Swan Coastal Plain and other parts of the south-west agricultural region.

Response: see response to Comment 1.7 *et al* below.

Comments 1.7, 2.10 & 4.10 Restoration/creation of wetlands in areas of greatest loss, e.g wheatbelt and Swan Coastal Plain, should be a priority.

Response: This comment will be referred to the Wetlands Coordinating Committee for consideration.

Comment 3.7 Many wetlands have been lost, e.g. around 80% of wetlands on the Swan Coastal Plain. We would like to see new wetlands created to replace those lost habitats.

Response: Promotion of "wetland creation" is specifically referred to in the Policy's first Primary Objective.

Comments 2.11 & 4.11 Wetland restoration/creation could be facilitated by cooperation with industry, especially mining companies.

Response: Agreed. This is already happening to some extent, e.g. Alcoa at Lake Toolibin and Baldivis, RGC Mineral Sands at Capel. Other opportunities could no doubt be sought. This suggestion will be referred to the Wetlands Coordinating Committee.

Comments 2.7, 3.4 & 4.7 Many voluntary groups are involved in wetland rehabilitation and funds should be given to these groups to assist their work.

Response: This suggestion will be referred to the Wetlands Coordinating Committee. Note that some government funds are already available for this purpose, e.g. through the Natural Heritage Trust.

Comments 9.2 & 9.9 Experience with the Swan Coastal Plain Lakes Environmental Protection Policy suggests it is important to refer to the economic values of wetlands (summer pasture, water supply, stock shelter), which may in some cases be retained without detracting from ecological quality, when devising means of encouraging private landowners to set wetlands aside. The impact of the Policy on these economic values should also be identified.

Response: It is intended that the proposed "wetland management advisory capacity" (action item 1.16) will *inter alia* devise means of encouraging landowners to conserve wetlands (see action items 1.17 & 1.19) and that, for these means to be successful, recognition of the types of economic values referred to above will be necessary.

It is considered impracticable and unnecessary - given that the Policy is a statement of government's general intentions rather than law (unlike the Swan Coastal Plain Lakes EPP) - to identify how implementation of the Policy might impact on existing economic values of wetlands and their catchments. It should also be noted that, particularly in respect to wetlands in private ownership, the emphasis (see page 9) of the Policy is on encouragement, advice, facilitation and voluntary participation, rather than coercion.

Comment 12.11 Wetlands on private land need more protection and incentives given.

Response: Agreed. Many of the Policy's action items are intended to lead to better protection of privately-owned wetlands. Although incentives not are specifically referred to in the Policy, action item 1.19 is to "encourage and assist private landowners and leaseholders to conserve ... wetlands on a voluntary basis". This suggestion will be referred to the Wetlands Coordinating Committee for consideration.

Comment 5.3 The establishment of demonstration projects showing the integration of wetlands into farm management programs would be an important advance.

Response: This suggestion will be referred to the Wetlands Coordinating Committee for consideration.

Comment 13.8 Although Action 1.14 (1.19 in the final document) encourages private landholders to "conserve, create ... wetlands", I found no reference for government to do the same.

Response: The Policy does indicate that the Government will ensure coordination and cooperation between its agencies in order to achieve the Policy's objectives (action item 1.1).

Comment 14.18 Land owners should be assisted and encouraged to conserve, create, restore and enhance their wetlands (action item 1.14). A big stick in the form of appropriate fines for those who deliberately destroy wetlands for no good reason should also be kept handy.

Response: The emphasis in the Policy is deliberately on encouragement and assistance. However, penalties are needed on occasions and may currently be imposed through the Environmental Protection Act and Policies, Conservation and Land Management Act, Wildlife Conservation Act, Soil and Land Conservation Act and Rights in Water and Irrigation Act. Although this Policy does not propose new regulations or penalties it does not limit their development or application.

Comment 14.9 Action 1.15 is recommended. Hope Mandurah City Council with so many wetlands in such a small area gets government support to implement wetland management plans.

Response: This suggestion will be referred to the Wetlands Coordinating Committee.

4.5.2 COMMENTS CONCERNING ACTION ITEMS LISTED UNDER THE 2nd PRIMARY OBJECTIVE

Comments 2.12, 3.8 & 4.12 Creation of a Statewide network of wetland reserves (Principal Objective 2) is strongly supported.

Comment 9.11 The meaning of "reserving" wetlands needs to be clarified in regard to Land Act reserves because this may be more difficult to implement than means such as caveats. For example, does reserving here simply mean identifying and delineating wetlands that should be managed for the purpose of protection by the landowner or community.

Response: "Reserving" in the context of Primary Objective 2 (and action item 2.3) refers to the creation of Nature Reserves, National Parks and Conservation Parks under the Land Act and Marine Parks and Marine Nature Reserves under the CALM Act. By law, these "conservation reserves" are vested in the National Parks and Nature Conservation Authority or the Marine Parks and Reserves Authority and managed by CALM on behalf of the Authorities. This is the highest level of legal protection that can generally be afforded to areas of conservation significance in Western Australia.

Comments 2.13 & 4.13 The wetland reserves network should include all Ramsar wetlands plus others important as wildlife habitat or scientific resource, e.g. Port Kennedy wetlands and Creery wetlands.

Response: Five of the State's nine Ramsar "Wetlands of International Importance" are wholly or largely within conservation reserves (Nature Reserves or National Parks). Reservation of all or most of each of the four remaining sites is proposed. See also response to Comment 21.7 below.

Comment 10.6 Quindalup dunes (wetlands therein) are not well represented (in the conservation reserve system).

Response: see response to Comment 21.7 below.

Comment 1.9 Representative areas of wetlands have been overlooked to date. For example the Quindalup wetlands which are very restricted are not protected. There is an urgent need to address this.

Response: see response to Comment 21.7 below.

Comment 21.7 We strongly support preservation of additional representative wetlands and key habitats e.g. Quindalup dune wetlands are inadequately represented and being destroyed.

Response: An assessment of the extent to which various wetland types and key wildlife (wetland) habitats are represented in the State's conservation reserve system is needed. This is proposed under action item 2.2 of the Policy. Reservation - as Nature Reserves, National Parks, Conservation Parks, Marine Parks or Marine Nature Reserves - of additional representative wetlands and key habitats is also proposed (action item 2.3). Specific concerns about lack of representation of Quindalup dune wetlands in the conservation reserve system will be referred to the Wetlands Coordinating Committee for consideration.

Comment 12.14 An urgent plan has to be put into practice to buy remaining wetlands for the protection of wildlife, e.g. bandicoots.

Response: The suggestion of a "wetland purchase plan" will be referred to the Wetlands Coordinating Committee for consideration. State Government purchase plans involving wetlands already exist. In

practice, only a small proportion of wetland habitats are ever likely to be purchased for nature conservation, due to the high cost of doing so.

Comment 18.9 Action item 2.3 should be reworded to read "where appropriate, *and after assessment of existing and potential land uses*, reserve additional representative wetlands and key habitats".

Response: It is considered that the words "where appropriate" provide an adequate and all-embracing qualification on the process of reservation. Note that the Policy also states that "where implementation of this policy conflicts with other proposals, that conflict will be resolved through the normal processes of State Government" (page 9, Strategy for Implementation).

Comment 13.10 The assessment and extension of wetland reserves is a key to this policy and I hope that it will not be limited to or by international agreements.

Response: Neither the Policy nor existing international agreements propose limitations of that nature.

Comment 15.7 It is important that management plans be specific enough to establish the requirements/criteria needed to allow any proposed adjacent development to proceed.

Response: This suggestion will be referred to the Wetlands Coordinating Committee for consideration.

Comment 12.19 As the indigenous people of Australia have lived in harmony with the environment for 40-100,000 years they should have a valuable input and be used as managers and advisers.

Response: This suggestion will be referred to the Wetlands Coordinating Committee for consideration. To an extent, this is already happening. For example, Aboriginal people participate in Park advisory committees and Park Councils, and CALM employs Aboriginal people in the management of conservation reserves, some of which include wetlands.

Comments 2.5 & 4.5 The Principal Objectives should recognize the need to secure and protect the major wetlands on migratory bird routes as required by the (Ramsar) Convention on Wetlands of International Importance" and the Japan-Australia and China-Australia Migratory Bird Agreements (JAMBA and CAMBA).

Response: see response to Comment 1.13 below.

Comment 1.13 An additional action item is needed under the fourth Principal Objective, namely to protect major wetland habitats used by migratory species subject to international treaties, e.g Ramsar, JAMBA and CAMBA.

Response: Action item 2.9 states that the Government will "fulfil its responsibilities under international agreements relating to the conservation of migratory waterbirds and wetlands". Action item 2.3 states that the Government will "where appropriate, reserve additional representative wetlands and key (wildlife) habitats for conservation". It is considered that these two action items adequately cover the obligations referred to above.

Comment 14.10 Commonwealth assistance is important and should be more forthcoming.

Response: Agreed; hence the specific reference to seeking Commonwealth assistance in action item 2.10.

Comment 6.2 Suggest include the word "planning" in action item 2.10.

Response: It is not considered necessary to separate out the planning component of management in this action item, as planning is regarded as an integral part of management.

Comments 14.11 Action 2.12 (aesthetics) is very important and so far overlooked.

Response: Agreed that it is important and has received inadequate attention, hence its inclusion in the Policy.

Comments 2.14 & 4.14 Funding for wetland research and management is an important issue. Many wetland reserves are poorly managed at present.

Response: see response to Comment 3.9 below.

Comment 3.9 Additional sources of funding will be needed to manage wetlands and should be investigated.

Response: Agreed that more management and management-related research is required and that present resourcing in this area is inadequate. These matters will be addressed through normal Government budget processes. Note that the Policy proposes the establishment of a Trust to raise funds from "wetland users, owners and managers, as well as the private sector and the general public, for wetland purchase, management and related research" (action item 2.14).

Comments 2.15 & 4.15 A Wetlands Conservation Trust (to fund wetland research and management) is a good idea but not enough. Other sources also need to be found.

Response: see responses to Comments 3.9 above and 14.12 below.

Comment 13.11 The funding does not look sufficient for the activities envisaged, unless "wetland users" includes those who use scheme and groundwater.

Response: see response to Comment 14.12 below.

Comments 2.16 & 4.16 A possible source of funds is a tax on excess water consumption. This will assist in water demand management and provide funds for wetland purchase and rehabilitation.

Response: see response to Comment 14.12 below.

Comments 2.17 & 4.17 A tax on private groundwater consumption should also be considered as this activity directly affects the quality of wetlands.

Response: see response to Comment 14.12 below.

Comment 13.2 Private use of groundwater is a private use of a community resource. Because groundwater use affects wetlands, collection of revenue for the Wetlands Conservation Trust is justified.

Response: see response to Comment 14.12 below.

Comment 14.12 WAWA should be involved in funding for the actions proposed under Primary Objective 2.

Response: The above recommendations will be referred to the Wetlands Coordinating Committee for consideration.

4.5.3 COMMENTS CONCERNING ACTION ITEMS LISTED UNDER THE 3rd PRIMARY OBJECTIVE

Comment 14.13 This is a good Objective. Much has been done under action item 1.6 (wetland classification - 1.10 in the final document).

Comment 1.10 We are particularly pleased that the policy has addressed the issue of biodiversity and genetic diversity. "Damplands" (seasonally-waterlogged wetlands) are species-rich and have been lost at a faster rate than other wetland types. However, they are not protected by the Swan Coastal Plain Lakes Environmental Protection Policy. We hope this Primary Objective will be given priority.

Response: Damplands are within the scope of this Wetlands Conservation Policy for Western Australia. Priorities for implementation of the Policy will be considered by the Wetlands Coordinating Committee.

Comments 2.18, 3.10 & 4.18 Recovery plans should be developed for all endangered or threatened wetland species as a matter of urgency.

Response: The degree of urgency varies from one species to another, depending upon the level of threat and other factors. Prioritisation is required. This issue is being addressed by CALM, particularly through its Threatened Species and Communities Unit.

Comments 1.11, 2.19, 3.11 & 4.19 Which wetland plant or animal species are harvested now that recreational duck shooting is banned in Western Australia ? (action items 3.6 & 3.7 in the draft document - 3.7 and 3.8 in the final document - refer).

Response: Numerous wetland plant and animal species are harvested. For example, various *Melaleuca* species are harvested for "beansticks" and brush fencing. *M. raphiophylla* and *M. pressiana* are harvested for "paperbark" for a variety of uses. *Boronia* species are harvested for the wildflower trade. Freshwater (*Crocodylus johnstoni*) and saltwater (*C. porosus*) crocodiles are harvested for hides, meat and other products.

Comments 2.19, 4.19, 10.8, 11.8, 12.3, 14.14 & 21.9 A variety of comments to the effect that the present ban on recreational duck shooting should continue.

Response: The Government has indicated that it does not intend to introduce legislation to Parliament to reintroduce recreational duck shooting.

Comment 15.6 Reference to the need to maximise species diversity implies intervention to create a range of habitats. This action might be more accurately related to its respective Primary Objective (number 3) by replacing "maximise" with "avoid loss of".

Response: Agreed; "maximise" has been replaced with "maintain" in action item 3.9 so that the wording of this item is consistent with that of Primary Objective 3.

Comment 14.15 Regarding action item 3.9 (implications of possible climate and sea level change), I endorse Arthur Marshall's suggestion that a Centre (be established) to monitor changes due to sea level changes (following completion of the) Dawesville Cut.

Response: The Dawesville Cut is expected to alter tidal regimes in Peel-Harvey estuary. Studies associated with monitoring of the impact of these changes on, for example, samphire communities of Peel-Harvey are likely to assist in the proposed review (action item 3.10) of the implications of possible climate and sea level change for the maintenance of wetland communities.

Comment 20.4 We believe that the development of procedures and guidelines to combat fires in wetlands should be included as a separate action item under the third Primary Objective.

Response: It is agreed that the issue of fire in wetlands has received little attention despite its social and biological importance and that it warrants specific reference. An appropriate modification has been made to the Policy.

4.5.4 COMMENTS CONCERNING ACTION ITEMS LISTED UNDER THE 4th PRIMARY OBJECTIVE

Comments 1.14 & 13.13 We wish to see the annual waterfowl counts resumed because it is important work.

Response: see response to Comment 10.7 *et al* below.

Comments 2.20 & 3.12 Annual waterfowl counts should be resumed because, with their large use of voluntary labour, they are the most effective/efficient way of monitoring wetlands and waterbird numbers.

Response: see response to Comment 10.7 *et al* below.

Comments 10.7, 11.2 & 21.8 Annual waterfowl counts should be resumed because they provided valuable information to assist in protecting waterbird populations.

Response: Annual waterfowl counts were formerly funded using revenue from recreational duck shooters licence fees (approx \$45,000 per year). These waterfowl counts have ceased since the banning of recreational duck shooting in Western Australia. Funding for action items 4.1 (monitoring) and 4.2 (establishment of population goals) will be addressed through normal Government budget processes and other means (e.g. the Trust in action item 2.14).

Comments 2.21 & 4.21 Annual waterfowl counts should be funded by the Wetlands Conservation Trust.

Response: Following establishment of the Trust (action item 2.14), this suggestion will be considered.

Comment 2.22 & 4.22 Volunteers should be used as much as possible in wetland research.

Response: Volunteers are very useful for certain types of research projects, typically those involving the simultaneous collection of data over a wide geographic area. Volunteers have participated in a number of wetland research projects in the past, for example in CALM's 1981-85 survey of waterbird use of wetland nature reserves; the 1986-88 annual waterfowl counts, egret colony surveys and remote wetland expeditions; the 1988-92 annual waterfowl counts and the 1990-92 survey of waterbird use of wetlands on the Swan Coastal Plain. The WRC and the DEP also involve volunteers in wetland research activities, e.g. in their Swan Coastal Plain wetland evaluation surveys.

Comment 2.23 & 4.23 CALM should be required to liaise closely with the voluntary conservation movement in its wetlands research program.

Response: In the past, CALM has liaised closely with the Royal Australasian Ornithologists Union (now Birds Australia) concerning waterbird aspects of its research program, as this was the main area of activity. CALM hopes that formation of the Wetlands Coordinating Committee, which will include representatives from both the voluntary conservation movement and CALM, will assist in broadening the scope of liaison in the future.

Comment 1.12 We are particularly pleased with commitments to "facilitate efforts of volunteer groups wishing to rehabilitate sick and injured waterfowl" (action 4.8) and to investigate etc. causes of major waterbird mortalities (action 4.9).

Comment 12.5 Volunteer groups that look after sick, injured and orphaned wildlife like waterbirds should be given financial and other resources to make their work possible.

Response: see response to Comment 2.24 *et al* below.

Comment 13.14 Voluntary groups are involved in various aspects of Primary Objective 4 - their activities could be expanded if funding was available.

Response: see response to Comment 2.24 *et al* below.

Comments 2.24, 4.24, 12.5 & 21.10 Funds should be supplied to conservation groups involved in waterbird rehabilitation to assist in their activities and to conduct research on avian botulism.

Response: Action item 4.8 is to "facilitate the efforts of volunteer groups wishing to rehabilitate sick and injured waterfowl". This already occurs to some extent, e.g. CALM logistic support in the event of major mortalities, however additional facilitation is warranted. The above recommendations will be referred to the Wetlands Coordinating Committee for consideration.

Comment 12.1 I am appalled that not enough has been done to prevent botulism outbreaks from re-occurring.

Response: Action item 4.9 is aimed at addressing this problem.

Comments 11.3 & 21.11 We support funding for investigation into causes of botulism and action taken to minimise occurrences (action item 4.9).

4.5.5 COMMENTS CONCERNING ACTION ITEMS LISTED UNDER THE 5th PRIMARY OBJECTIVE

Comment 13.15 Primary Objective 5 has a good set of methods of implementation. This is a key Objective as the success of all others depends on community understanding and cooperation.

Comment 12.16 More education for Government bodies and the public is needed.

Response: This is proposed under the 5th Primary Objective.

Comment 14.18 Objective 5 is the most important of all; it should be between Government and the conservation movement.

Response: see response to Comment 11.5 *et al* below.

Comments 11.5, 21.12 & 21.13 Wetland education is currently inadequate and should be expanded. It should include expertise from the voluntary conservation movement.

Response: This suggestion will be referred to the Wetlands Coordinating Committee for consideration. Note that the voluntary conservation movement already has a significant involvement in wetland education, both cooperatively with Government and independently.

Comment 13.16 As there are a number of community and local government groups already involved in some of the actions listed under Primary Objective 5, cooperation and financial assistance would give the strategy a head start.

Response: This suggestion will be referred to the Wetlands Coordinating Committee for consideration. Note that significant cooperation and financial assistance already occurs, e.g. the Herdsman Lake Wildlife Centre.

Comment 2.25 & 4.25 Wetland education should be a joint venture; it should occur through schools and wetland education centres run by the voluntary conservation movement. Government should provide financial assistance and support for these efforts.

Response: see response to Comment 13.16 above.

Comment 22.12 The location of the Wetland Education Unit (action item 5.2) in CALM is supported; this also needs to have adequate resources.

Response: The proposal to establish an education unit in CALM has been revised in favour of a coordinated, multi-agency approach to the development of educational materials and activity programs (action item 5.2). Resourcing matters will be addressed through normal Government budget processes.

Comment 17.4 At action item 5.2, it would probably be a good idea to mention industry because of their promotion of wetland education and research, as at the RGC Wetland Centre at Capel.

Response: see response to Comment 22.12 above. It is not considered necessary to specifically mention "industry" in action item 5.2 as industry is included in "target audiences and interested groups".

Comment 7.3 In relation to action item 5.2 (wetland education unit), there is an urgent need to clearly establish and quantify broader community values of wetlands in flood mitigation, as nutrient sumps etc.

Response: This suggestion will be referred to the Wetlands Coordinating Committee.

Comment 17.6 It is conventional to refer to tertiary "institutions" rather than "institutes" (action 5.2).

Response: This has been amended in action item 5.2 of the final Policy.

Comment 17.5 At Action 5.4 (or 5.2), if the proposed Vasse Centre is mentioned, it is a pity not to mention the existing Herdsman Lake Wildlife Centre.

Response: An appropriate amendment has been made to action item 5.3 of the final Policy.

Comment 3.13 Funding should be made available to develop additional wetland education centres.

Response: Action item 5.3 states that Government will "encourage and support the establishment and operation of a small number of ... wetland centres ..." It is possible that some support may take the form of Government funding, as has occurred in the past. This suggestion will be referred to the Wetlands Coordinating Committee for consideration.

Comment 2.26 & 4.26 Wetland education centres are desirable at Vasse-Wonnerup, Leschenault, Peel-Harvey and Yellagonga as soon as possible.

Response: see response to Comment 14.19 below.

Comment 14.19 Creery Wetlands is an ideal site for a wetland education centre. The voluntary conservation movement should be involved here.

Response: In the past, wetland centres in Western Australia have been conceived and developed individually, by a variety of people and organisations, both government and non-government. There may be a role for the Wetlands Coordinating Committee in proposing and/or initiating new centres and, in particular, in proposing a network of strategically located and complementary centres. This issue will be referred to the Committee for consideration.

Comment 11.9 Our wetlands and waterbirds, if properly cared for, form a most important asset for our tourism industry.

Response: Agreed; hence the Government's commitment to maintaining this asset and the specific proposals relating to tourism contained in action items 5.4 & 5.5.

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APPENDIX 1 PUBLIC SUBMISSIONS

Submissions were received from the following:

State Government Agencies

Department of Land Administration
 Department of Minerals and Energy
 Department of Planning and Urban Development
 National Parks and Nature Conservation Authority
 WA Water Authority
 Western Australian Water Resources Council
 Waterways Commission
 and two Regional Managers of CALM,

Local Government

City of Melville,

Conservation Organisations

Busselton Peace and Environment Group Inc.
 Conservation Council of Western Australia Inc.
 Foothills Wetland Preservation Society
 Peel Preservation Group Inc.
 South West Wetlands Awareness and Monitoring Program (SWWAMP)
 Fostering and Assistance for Wildlife Needing Aid (FAWNA) (combined submission with SWWAMP)
 Waterbird Conservation Group Inc.
 Wetlands Conservation Society

Individuals

Ian Briggs, Coordinator, Natural Resource Management, UWA
 Canna Calzoni, Booragoon
 Mrs Betty Murphy, Joondanna
 Associate Professor John J. Pigram, Centre for Water Policy Research, University of New England,
 NSW
 Wilma Vincent, Mount Pleasant

APPENDIX 2 ACRONYMS

The following acronyms appear in this document:

AgWA	Agriculture Western Australia
ANCA	Australian Nature Conservation Authority (now EABG)
CALM	Department of Conservation and Land Management
CAMBA	China - Australia Migratory Birds Agreement
DEP	Department of Environmental Protection
DOLA	Department of Land Administration
DOE	Department of Minerals and Energy
DPUD	Department of Planning and Urban Development (now Ministry for Planning)
EABG	Environment Australia, Biodiversity Group (Commonwealth Government)
EPA	Environmental Protection Authority
EPP	Environmental Protection Policy
ICMCG	Integrated Catchment Management Coordinating Group (now defunct)
JAMBA	Japan - Australia Migratory Birds Agreement
MfP	Ministry for Planning
NPNCA	National Parks and Nature Conservation Authority
OWR	Office of Water Regulation
WAWA	WA Water Authority (since split to form WRC, Water Corp and OWR)
WAWRC	Western Australian Water Resources Council (now part of WRC)
WRC	Water and Rivers Commission
WWC	Waterways Commission (now part of WRC)