

Houtman Abrolhos Islands National Park

Summary of issues from public submissions to
the draft management plan

2022



Turtle Bay, East Wallabi Island, Houtman Abrolhos Islands National Park. Photo – Clare Atkins/DBCA

1. Introduction

This document is an analysis of stakeholder submissions to the *Houtman Abrolhos Islands National Park Draft Management Plan 2021* (draft plan) (Department of Biodiversity, Conservation and Attractions 2021). It presents key issues and themes that arose from the submissions and explains how these have been addressed in the final plan.

2. Plan distribution

On 19 May 2021, the draft plan was released by the Minister for Environment for a ten-week public comment period, which closed on 26 July 2021. Following the release of the draft plan, a notice was published in the *Government Gazette* on 21 May 2021 and two editions of *The West Australian* (26 May and 23 June 2021) and *Geraldton Guardian* (1 June and 2 July 2021), as required under s57(2) of the *Conservation and Land Management Act 1984* (CALM Act).

Information and a PDF copy of the draft plan was published on the Department of Biodiversity, Conservation and Attractions' (the department or DBCA) website (dbca.wa.gov.au/haveyoursay) with a link to a survey for submitters to provide comment via Survey Monkey. A link to DBCA's website was also placed on the Department of Primary Industries and Regional Development (DPIRD) Abrolhos Islands webpage.

The draft plan was sent to Ministers, State Government departments and local government authorities as per s59 of the CALM Act. A total 211 stakeholders were notified of the release of the draft plan and how to make a submission, including State and Federal government departments, non-government organisations, conservation groups, community groups, local businesses, and individuals.

Hard copies of the draft plan were available from Parks and Wildlife Service Head Office, Kensington and the Parks and Wildlife Service Midwest Region Office in Geraldton.

A public open day was held at the Parks and Wildlife Service Midwest Regional office on 21 June 2021 where the public could collect copies of the draft plan, obtain information about how to make a submission and discuss the draft plan further with departmental staff.

Information briefings about the draft plan were provided to local Geraldton and Agricultural Region Members of Parliament, City of Greater Geraldton Council, Geraldton Professional Fishermen's Association and Western Australian Museum (WA Museum) by request.

Media coverage of the draft plan release included articles in *Geraldton Guardian* and *Midwest Times* and items on GWN News and ABC Radio.

3. Analysis of public submissions

Information was recorded relating to the submitter's contact details and location, submitter type/interests (e.g. conservation, tourism) and submitter comments or key issues identified. Statistics were generated on several aspects of the public submissions including an overview of submitter demographics, an explanation of the key issues raised in submissions, and a summary of key issues by chapter/sector. This report describes these results.

The draft plan was reviewed in the light of submissions received, according to the criteria outlined below.

The draft plan *was* amended if a submission:

- provided additional information of direct relevance to management
- provided additional information on affected user groups of direct relevance to management
- indicated a change in (or clarified) government legislation, management commitment or management policy
- proposed strategies that would better achieve management objectives or
- indicated omissions, inaccuracies, or a lack of clarity.

The draft plan *was not* amended if a submission:

- clearly supported proposals in the draft plan
- made general statements and sought no change
- made statements already in the draft plan or that were considered during the draft plan preparation
- addressed issues beyond the scope of the draft plan
- was one amongst several widely divergent viewpoints received on the topic but the text/strategies in the draft plan were still considered the preferred option
- contributed options that were not feasible (generally due to conflict with existing legislation, government policy, lack of resource capacity or lack of research knowledge to make decisions)
- was based on unclear/factually incorrect information
- provided details that are not appropriate or necessary for inclusion in a document aimed at providing management direction over the long term.

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

4. Submissions

A total of 46 submissions were received (although one submission was not considered due to offensive content). Forty-six per cent of submitters were from Perth, 44 per cent were from Geraldton or the Midwest and the remainder were from regional Western Australia or did not provide a place of residence.

Just over a quarter of submitters represented conservation interests (such as conservation groups, seabird experts and research scientists). There were 10 submissions from commercial fishers and aquaculture operators and four submitters representing the tourism industry. Eight submissions were received from Ministers, State Government departments and local government. Two submissions were from other non-government organisations and the remainder from individuals (see Appendix 1).

Just over 1000 comments were separated out from the 45 submissions. Based on the criteria outlined above, 7.4 per cent of comments were supportive or made general or neutral statements. Just over 50 per cent of comments resulted in a change to the final *Houtman Abrolhos Islands National Park management plan* (final plan).

5. Key issues

Overall, submitters commented on all parts of the draft plan except for 22. *Water resource use*. Certain sections of the plan attracted significantly more comments than others. There were many submissions that were very detailed and provided additional references and materials to support the submitters point of view. Many submitters were seeking a similar greater level of detail in the draft plan, especially in relation to the rationale for management decisions, monitoring programs, the management of visitor use, nature-based tourism development and how the department intends to implement the management strategies and measure key performance indicators (KPIs).

This document summarises the main themes raised in the public submissions and does not discuss all amendments to the plan or instances where the plan was not amended.

INTRODUCTION

Planning area

Four submitters commented on the location of the national park boundary on West Wallabi Island. Submitters noted that fishing camps within the portion of Abrolhos Reserve on the western side of the island have been impacted by storm surge in recent years, resulting in beach erosion, causing damage to camps and buildings to wash away. Submitters were seeking to have the national park boundary moved further inland to expand the size of the adjacent Abrolhos Reserve, so that camps could be moved away further inland and away from the impacts of storm surge.

The national park was created recently in 2019 and, as part of the process to create the park, the proposed boundaries were publicly advertised, and comment sought from stakeholders and the public about suitable locations for these boundaries. Locating the boundary further inland on West Wallabi Island was not raised as an issue during the reserve creation process. Therefore, no amendment was made to the plan about recommending a change to the national park boundary on this island. The issue has been referred to DPIRD, as managers of the Abrolhos Reserve, for consideration and resolution.

MANAGEMENT DIRECTION AND CONTEXT

Whole-of-government management and administration

Fourteen submitters provided feedback to 3. *Management context*. In relation to the section about the whole-of-government management and administration, there were some concerns that the department lacks the funding, staff and adequate expertise required to manage the park and its values. Additional detail was added to the plan about the current operational and ranger staffing levels and their roles and responsibilities, and facilities associated with park management. Specific information about funding for the implementation of CALM Act management plans is too detailed for a document which aims to provide management direction and retain adequate flexibility for management over the long term. Additional information outlining the purpose of management plans was added to this section and that greater detail about plan implementation will be provided in operational plans, to be developed in consultation with stakeholders.

Island classification based on values

This section attracted numerous comments from 12 submitters. Submitters proposed additional values to be considered in the classification of value-rich islands and additional islands with important

values that had not been used to classify islands as value-rich. In addition, some submitters were seeking greater detail about the analysis process and criteria used to identify value-rich islands and how this classification would be used as a tool to manage impacts from visitor use and other human activities on islands with multiple significant values.

Based on these comments, it was decided that the classification of islands as “value-rich” as a way of prioritising islands with important natural and cultural values was not detailed enough and the analysis process should have been more comprehensive. Therefore, a more detailed assessment of values on each island within the park was completed and this information is now presented in the plan in Appendix 2. Additional detail was also added to this section regarding the distribution of values across the islands of the park and the point that certain islands support more natural and cultural heritage values than others. Some of these islands also tend to be more attractive for visitation. The reference to “value-rich islands” was removed from the plan. The plan now refers to 11 priority islands for management, which includes islands with important natural and cultural heritage values that are also important for visitation. To protect these values, the department will focus its management efforts, particularly in relation to visitor use, on these islands. The range of management strategies that will be used to protect the values of these islands are outlined in *Appendix 3. Priority islands for management*. Further detail about the management of these islands is referenced throughout the final plan.

MANAGING NATURAL VALUES

Physical environment

Several submitters felt that the background text in relation to historical sea-levels, climate change and the El Niño Southern Oscillation (ENSO) weather pattern had not been adequately referenced. Additional supporting information and references were added to the plan. Several submitters also commented on the impacts from climate change and the need for future coastal hazard management planning in the park, especially in relation to tourism developments. Information was added to this section of plan about the Western Australian Planning Commission’s policy framework and requirements for coastal planning and to *18. Commercial operations and nature-based tourism development*.

Biological environment – seabirds, shorebirds and marine raptors

The section outlining the management of other conservation significant birds attracted the most comments of the *Managing natural values* chapter of the plan, with many focused on the KPIs. Overall, there was limited support for the KPIs associated with seabird management in the park and some felt they were not measurable or achievable or that the targets needed to be more ambitious. Submitters asked how the monitoring program to report against these KPIs would be implemented and funded, and where would monitoring sites be located. Some felt that “limits of acceptable change” in the final KPI, “*Reduction in the breeding success of key seabird species is not beyond the limits of acceptable change over the life of the plan*” was not clearly defined. There was also the suggestion that, for the performance measure, “*Disturbance to burrowing seabird habitat by visitor activities*”, monitoring associated with the target, “*Number (percentage) of collapsed burrows recorded during burrowing seabird breeding seasons on islands used by visitors (West Wallabi, Beacon, Leo, Morley, Wooded, Gun, Pelsaert Islands) does not increase over the life of the plan*” would contribute to the disturbance of burrowing seabirds and would not be an effective measure as burrows collapse naturally. Another suggestion was that KPIs should consider migratory shorebirds and marine raptors, as well as seabirds. Finally, there was the comment that when monitoring indicates a change in seabird populations or breeding success from visitor use impacts, KPIs should include trigger points to outline when sites be temporarily closed to visitation.

As a result of these comments, considerable changes were made to the background text, strategies and KPIs associated with management of conservation significant bird species. The heading of the section was changed to “Seabirds, shorebirds and marine raptors” to more clearly define the important groups of birds found in the park. Additional background text about shorebirds and marine raptors was also added.

Extra background information was added about the monitoring programs likely to be implemented, the key species likely to be monitored and where this monitoring may occur. Further detail about the research and monitoring plan (that will sit underneath the management plan) was added to the *Research and monitoring* chapter and detail about what information it is likely to contain, including future research priorities, proposed monitoring programs (such as what species will be monitored and how, where and what monitoring data will be collected), communication of research findings, collaboration with external research organisations and research scientists and how future management of the park will be based on information collected in research and monitoring programs.

The key focus of the management of seabirds, shorebirds and marine raptors in the park will be to ensure that human activities, especially the use of the islands by visitors, does not impact on these values over the life of the plan. It is acknowledged that seabird, shorebird and marine raptor populations are likely to be impacted by other factors within and outside the park. However, by comparing populations on islands where visitation occurs and comparing these with populations on islands where there is no visitation will hopefully demonstrate whether there are impacts from visitor use and if changes to management are required.

To better address this, several additional strategies were added to *7. Biological environment* including:

Ecological communities

- Map areas covered by mangroves in the park and monitor changes in extent over the life of the plan with a focus on islands where visitor access and facilities are provided.

Seabirds, shorebirds and marine raptors

- Map locations of key seabird, shorebird and marine raptor habitat and monitor their abundance, diversity and breeding success to establish baseline data and trends, with a focus on islands where visitor access and facilities are provided.
- Determine the limits of acceptable change for key seabird species, their breeding success and relevant indicators and thresholds to inform monitoring and management responses.
- Collaborate with DPIRD in the protection and management of seabird, shorebird and marine raptor habitat, within the Abrolhos Reserve, especially in the adjacent intertidal area of all islands within the park.

Existing KPIs were also modified and new KPIs in relation to seabird, shorebird and marine raptor management were added to this section, including:

Key performance indicator		
Performance measure	Target	Reporting
Seabird, shorebird and marine raptor richness and abundance	No loss of seabird, shorebird and/or marine raptor diversity and abundance because of human activities in the park over the life of the plan.	Every 5 years

Seabird breeding and/or nesting activity.	No loss of seabird breeding and/or nesting activity recorded because of human activities in the park over the life of the plan.	Every 5 years
Disturbance to seabird nesting habitat because of human activities.	No significant disturbance or damage to seabird nesting habitat, nests, eggs, or fledglings recorded because of human activities in the park over the life of the plan.	Annually
Seabird breeding success.	No decline in the breeding success of key seabird species beyond the limits of acceptable change due to human activities or increaser species in the park over the life of the plan.	Annually

Waste management and pollution

Five submitters commented on this section of the plan. One submitter was seeking more detail about how visitors would be encouraged to remove their own waste (especially toilet waste) and how this would be enforced. This submitter also thought more information was required about wastewater management at visitor use sites. Additional detail was added to the plan about the provision of toilets at visitor sites and that these would need to comply with guidelines developed by DPIRD, Department of Health and City of Greater Geraldton for the installation and use of appropriate septic tanks in the park. A strategy about septic and wastewater systems associated with visitor sites needing to comply with these guidelines and ensuring that untreated waste is not discharged directly into the marine or terrestrial environment was also added.

Several comments were also made that, given the park's remote location, it is naturally dark at night, and unaffected by light pollution, which should be recognised as a value. The submitter cited the *National Light Pollution Guidelines for Wildlife Including Marine Turtles, Seabirds and Migratory Shorebirds* (Commonwealth of Australia, 2020) and suggested that these be referenced in the plan and applied across the park. Background information about the value of the dark night sky and the Commonwealth guidelines was added to the plan, together with a new strategy that referred to ensuring that impacts of pollution (including light pollution) are considered in the planning and design of visitor facilities and that relevant guidelines are considered where appropriate.

MANAGING CULTURAL HERITAGE VALUES

Several submitters referred to Aboriginal cultural heritage, the connection of Aboriginal people to the park and suggested that there be further consultation with the relevant Regional Corporation. Some extra background and a strategy were added to the plan that the department would consult with local Aboriginal people and other relevant stakeholders in the protection and interpretation of cultural heritage and providing opportunities for Aboriginal people to connect with country in the park if further evidence of is uncovered.

One submitter felt that greater clarification was needed about the different Commonwealth and State legislation that protects cultural heritage values in the park and the roles and responsibilities of the respective agencies (DBCA, DPIRD and WA Museum) in cultural heritage protection. Some additional background detail was added to this chapter and 3. *Management context*.

A submitter noted that the development of visitor facilities, nature-based tourism and the encouragement of greater visitation to the park and the Abrolhos more broadly will likely lead to the

discovery of new cultural heritage artefacts (especially maritime archaeological material) and suggested that the plan needed to include a mechanism to ensure these new discoveries are reported. A new strategy was added to the plan that DBCA would report the discovery of cultural heritage artefacts to WA Museum and would provide information to visitors to encourage them to do the same.

Finally, there was the comment that this chapter of the plan should include a strategy to support the development of a Memorandum of Understanding between DBCA, DPIRD and WA Museum to provide a framework for managing cultural heritage values at the Abrolhos. In 3. *Management context*, this is covered by the strategy, “*Contribute to the development of a joint decision-making framework and cross jurisdictional authorisation between agencies with responsibilities at the Abrolhos (across the park, Abrolhos Reserve, Fish Habitat Protection Area (FHPA) and National Heritage Listed sites).*” This strategy addresses the development of a framework for the protection of all values and their management at the Abrolhos, including cultural heritage. A separate agreement or Memorandum of Understanding was not considered necessary. Considering the management of cultural heritage values as part of this broader framework was considered to be the most effective and efficient way of ensuring collaboration between the different agencies with responsibilities at the Abrolhos and no further changes were made to the plan.

MANAGING VISITOR USE AND COMMUNITY VALUES

This chapter attracted the most comments out of any of the chapters in the draft plan. The main concern for submitters was that, by providing new visitor facilities (boardwalks, toilets, shade shelters, jetties and interpretation), opportunities for tourism development and encouraging more people to visit the park, would result in increased impacts to the significant natural and cultural heritage values and would detract from the unique Abrolhos remoteness and sense of place. Submitters strongly emphasised the importance of protecting these values and characteristics of the park. Based on this feedback, some changes to visitor use proposals were made and greater detail was added to the plan about how a variety of management strategies, supported by monitoring programs, would ensure a balance between the protection of the natural and cultural heritage values and enabling visitors to enjoy and appreciate the park and its values.

Visitor use planning

One submitter recommended that the section about visitor master planning should refer to requirements for approval under local government building regulations prior to the construction of new visitor facilities and nature-based tourism developments. Information about approval under relevant building regulations was added to this section.

Another submitter made multiple comments suggesting that infrastructure development should be low-key, not detract from the landscape values and not impact on the natural values. A strategy in this section was modified to clarify this.

Six submitters emphasised the value of visitor information, education and interpretation and highlighted that visitor communication is of critical importance in ensuring that visitors behave appropriately within the park, to reduce negative impacts on natural values (especially seabirds and shorebirds and other wildlife). Submitters suggested that visitor information could be improved with the development of codes of conduct, phone apps and revision of existing visitor guides. Whilst this specific information is too detailed for the plan, further information was added to background text and strategies to emphasise the importance of providing visitor interpretation that ensures appropriate behaviour in the park. An extra KPI about the development and implementation of the visitor education, information and interpretation program was also included.

Visitor access – air access

In relation to air access, there was the suggestion that the plan should outline how the use of remotely piloted aircraft (drones) will be managed in the park. The department has a Statewide approach to managing drones in parks and reserves. Information outlining the relevant legislation and regulations that apply to drone use was added to the plan and that details about drone use would be developed and included in relevant visitor information.

There were several comments that referred to the Great Barrier Reef Marine Park Authority, *Guidelines for Managing Visitation to Seabird Breeding Islands* (Great Barrier Reef Marine Park Authority, 1997) and that the suggestion that these should be applied in the management of visitor access to seabird breeding islands in the park. This document includes recommendations for minimising the impact of aircraft on populations of breeding seabirds. Some of these examples were added to the plan. The strategy in the plan referring to the development of guidelines to managing aircraft access to the park, was also amended to, “*Liaise with seabird researchers, experts and aircraft charter companies to develop guidelines regarding the management of aircraft access to the park and impacts to seabirds, shorebirds, and raptors*”.

Visitor access – boat access

The section about boat access attracted multiple comments. Most of these were in relation to public moorings, located in the FHPA and managed by DPIRD. Submitters emphasised the need for consultation with DPIRD about mooring location, design, management and monitoring. Some suggested the consideration of seasonal closure of moorings, in line with seasonal access restrictions to high value islands and the establishment of aquatic buffer zones around islands during period of seasonal closure. Given their location in the FHPA, the location and management of moorings is outside the scope of the park management plan and these comments were passed onto DPIRD for their consideration. Additional information was added to the plan noting that boat access, boating and other visitor activities within the FHPA are managed by DPIRD and, together with the management of moorings and anchorages, are outlined in the *Houtman Abrolhos Islands Fish Habitat Protection Area Management Plan 2022* (DPIRD, 2022a).

Submitters also noted that the location of moorings creates visitor nodes in the park, increasing visitation pressure around landing points on islands adjacent to moorings. An acknowledgement of this was added to the plan.

Visitor access – pedestrian access

In relation to pedestrian access, one submitter outlined that the lack of public pedestrian access between the airstrip (within the park) and the jetties (within the Abrolhos Reserve) is a constraint for tourism development and is a visitor safety risk on Rat Island (the submission referred to East Wallabi Island but given there are no portions of the Abrolhos Reserve on East Wallabi Island, the submitter must have been referring to Rat Island). As a result, a new strategy was added to the plan about collaborating with DPIRD in considering pedestrian access between the park and Abrolhos Reserve on islands with both tenure (ie Rat, North, West Wallabi, Leo and Newman islands).

Visitor access – visitor access restrictions

There was widespread support for the application of seasonal visitor access restrictions to seven islands important for seabird breeding and sea lion pupping, with 12 out of the 13 submitters who provided comment on this section wholly or partly supporting this approach. Some submitters

suggested that seasonal visitor closures be considered on additional islands and that the timing of seasonal access restrictions (proposed for September-February in draft plan) should be extended September-May due to wedge-tailed shearwater chicks not being fully-fledged until May. The seasonal access restrictions are only being considered on islands that are used by visitors. The plan states that the development of visitor facilities and management will be focused on East Wallabi, Beacon, North, West Wallabi, Rat, Leo, Morley, Wooded, Pelsaert and Gun islands and that visitation to other islands will not be encouraged or promoted over the life of the plan. Given this, it will not be necessary to consider visitor access restrictions for other islands and therefore no further amendments were made to the plan. Regarding the extension of the seasonal visitor access restrictions to May on islands where wedge-tailed shearwaters nest, additional information was added to the background text noting that wedge-tailed shearwater chicks do not fledge until May. As noted in the strategy, the development and implementation of seasonal visitor access restrictions will be subject to monitoring outcomes, scientific advice, and stakeholder consultation.

There were some comments recommending that Wooded Island should be closed to visitors permanently, to protect lesser nobby populations on this island and because it is difficult for visitors to access this island. The draft plan already noted the presence of lesser noddies on Morley, Wooded and Pelsaert islands and the potential for commercial tour operators to access to Morley Island during periods of restricted access for other visitors as a controlled way of allowing visitors to view populations of lesser noddies under appropriate licence conditions. In response to these comments, this management approach was changed and a broader range of options for visitor access to nesting lesser nobby habitat on these three islands during breeding seasons was added to the plan, namely:

- Morley Island – development of appropriate visitor facilities (ie boardwalks, bird hides and visitor information and interpretation to outline appropriate behaviour) to enable public and commercial tour operator access (operating under relevant licence conditions) to nesting lesser nobby populations
- Wooded Island – seasonal visitor access restrictions with an opportunity for commercial tour operator access (operating under relevant licence conditions)
- Pelsaert Island – permanently closed to all visitor access.

Information was added to the background text that restrictions will only apply to the areas used by nesting lesser noddies on these three islands, subject to the development of appropriate licence conditions, visitor infrastructure, monitoring outcomes, scientific advice, and stakeholder consultation. Should monitoring demonstrate impacts of visitation to breeding lesser noddies, the seasonal or permanent closure of the nesting lesser nobby habitat on either Morley or Wooded islands (or both) will be considered. The plan also notes that seasonal visitor access restrictions may still be applied to other parts of Morley, Wooded and Pelsaert islands to protect other breeding seabird species and sea lions during pupping seasons, as required. The general nature of the strategies in this section of the plan that apply to this issue were retained.

There were also comments recommending the application of a broad zoning scheme to islands in park. However, this recommendation was not incorporated into the plan. A zoning scheme would require very generalised management of groups of different islands. As is now outlined in the plan, each island supports a unique suite of natural and cultural heritage values and, because of this, each one requires a slightly different, tailored management approach. The unique management approach for the 11 priority islands for management is outlined in Appendix 3 (originally management of the value-rich islands in Appendix 2 of the draft management plan).

Visitor activities – day use

There was general support for banning kitesurfing and windsurfing on Leo, Morley and Wooded islands during seabird breeding periods and some thought this ban should be extended to other islands, such as Pelsaert Island. The plan was amended to state islands where season visitor access restrictions will apply (ie West Wallabi, Wooded, Morley, Leo, White Bank, Pelsaert and Gun islands), some beaches may be closed to kite and windsurfing during seabird breeding times.

Visitor activities – camping

There was general opposition to the proposals associated with camping in the park. Of the submitters who specifically referred to proposed camping on Pelsaert Island, there was no support for permitting camping at this location and of the six submitters who referred to the proposal for camping on North Island, only two were supportive. Submitters cited a variety of reasons for not supporting camping, including the difficulty in managing impacts to natural and cultural heritage values (especially seabird breeding areas), biosecurity risks, the potential for increases in toilet waste and rubbish, impacts to seabirds from lighting and risk of escape from campfires). Therefore, the proposals for the development of campsites on North Island and the northern end of Pelsaert Island were removed from the plan and replaced with a strategy that, in consultation with stakeholders, a more detailed assessment of the park would be completed to determine any suitable location/s for camping, where potential impacts of camping to the natural and cultural heritage values can be minimised. No camping will be permitted in the park until this camping assessment is completed and appropriate locations for camping are determined, designated and developed.

Commercial operations and nature-based tourism development

This section of the draft plan attracted the most comments (over 10 per cent) from 22 submitters. In relation to tour operator licensing, submitters suggested that operators and guides need appropriate accreditation, training and qualifications to operate in the park, with specific knowledge about the Abrolhos to ensure the correct information is given to tour participants about the values of the park and appropriate visitor behaviour. In response, additional background text about accreditation, the importance of operators promoting the protection of the park's natural and cultural heritage values and appropriate visitor behaviour was added and strategies were modified to incorporate these points. The strategy, *“Develop and distribute educational and interpretive materials to commercial operators about the natural and cultural heritage values of the park and appropriate visitor behaviour for sharing with tour participants”* was also added to the plan.

There were also many comments about appropriate group sizes for tour groups accessing the islands. Several submitters suggested that group sizes should be less than 12 and no more than 50 people visiting an island on any one day, especially during seabird breeding periods. There were also concerns about tour boats operating at excessive speeds and tour guides allowing tour participants to walk over migratory shorebird and nesting seabird habitats, causing disturbance. Tour group size and ratios of guides to participants, appropriate behaviour for tour groups and guides, appropriate islands to access and pre-approved activities are all considered in commercial operator licence conditions specific to the park. Based on monitoring outcomes, impacts to natural and cultural heritage values and management requirements, these conditions are reviewed regularly, and so are outside of the scope of the plan. However, detail was added to the background text about what specific licence conditions for the park might consider. The strategy referring to the application of conditions to commercial licences and leases was also modified to note that these will be reviewed regularly, based on monitoring and impacts to natural and cultural heritage values.

Likewise, there were multiple comments about tourism development in the park, in particular concerns that the draft plan did not provide enough detail about what type of tourism development would be permitted. For some submitters, there was the perception that tourism development in the park would include resort-style accommodation. However, it was outlined at various points in the draft plan that tourism development would need to be sustainable, enhance or at least not impact upon natural and cultural heritage values, visitor experience or sense of place at the Abrolhos and provide high quality visitor experiences. To provide further clarity, any reference to tourism development in the plan, was changed to *nature-based* tourism development. Further detail about the type of nature-based tourism development to be selected for the park this was deliberately omitted from the draft plan. Rather, this section did provide information about the publicly advertised, competitive process that would be used to select a proponent for tourism development at the Abrolhos and the criteria that might be used to assess development proposals. Including any more specific detail about tourism development in the plan could pre-empt the outcome of this competitive process and result in a process that does not consider as broad a range of opportunities as possible to ensure the most suitable applicant is selected.

There were also some concerns about the location of nature-based tourism development. The draft plan proposed that the department preferred tourism development to be considered on islands containing both park and Abrolhos Reserve. There were several submitters who did not support nature-based tourism development on some or all these islands. In addition, there were submitters who commented they did not support tourism development on additional islands (including Pelsaert, Morley, Wooded, Beacon and Long islands). These concerns are acknowledged, however, the general principle of a preference for nature-based tourism development to be considered on islands that contain both national park and Abrolhos Reserve is still considered the best option and remains in the final plan. Further information was added to the plan acknowledging that different islands support a varying suite of values, with certain islands having multiple significant natural and cultural heritage values and those that may be more sensitive to impacts from visitation and tourism development. This will be a factor which will be incorporated into the selection process and any development proposals for islands with more significant values will be subject to more rigorous selection criteria and a higher level of environmental impact assessment compared with proposals for islands with fewer or less significant natural or cultural heritage values. This will apply to islands that contain both park and Abrolhos Reserve and to islands that are solely national park.

Finally, there were concerns from a couple of submitters that the publicly advertised, competitive process that will be used to select a proponent for nature-based tourism development at the Abrolhos, would disadvantage current-long term Abrolhos operators. These comments were outside of the scope of the draft plan and including any more specific detail about suitable proponents for tourism development at the Abrolhos in the plan could pre-empt the outcome of this competitive process and unfairly give advantage to some proponents over others. No further changes were made to the plan based on these comments.

MANAGING ECONOMIC AND RESOURCE USE VALUES

Utilities and Services

Five submitters referred to the construction of the departmental operations base on East Wallabi Island and were either seeking more detail about this proposal or did not support its construction at

this location. Further information about the operations base on East Wallabi Island was added to 3. *Management context – Whole-of-government management and administration*, including a statement that a that the department uses its Disturbance Approval System to assess the environmental impacts of all disturbance activities on department-managed lands.

6. Summary

The release of the *Houtman Abrolhos Islands National Park draft management plan 2021* for public comment attracted many, very detailed submissions. Comments came from a wide range of stakeholders, representing a broad spectrum of groups and interests.

Issues that were of particular interest for submitters included:

- the national park boundary
- whole-of-government administration and management
- island classification based on values
- the management of seabirds, migratory shorebirds and marine raptors (especially KPIs)
- visitor waste management and light pollution
- visitor access (especially air and boat access)
- visitor access restrictions
- camping
- the management of commercial tour operations and
- nature-based tourism development in the park.

Based on these comments, the plan was modified to include better management options and improve clarity.

REFERENCES

Department of Biodiversity, Conservation and Attractions, 2021, *Houtman Abrolhos Islands National Park Draft Management Plan 2021*, Department of Biodiversity, Conservation and Attractions, Kensington.

Great Barrier Reef Marine Park Authority 1997, *Guidelines for Managing Visitation to Seabird Breeding Islands*. Prepare by WMB Oceanics and Gordon Claridge for the Great Barrier Reef Marine Park Authority and Environment Australia – Biodiversity Group. Great Barrier Reef Marine Park Authority, Townsville.

APPENDIX 1 – SUBMITTERS TO THE HOUTMAN ABROLHOS ISLANDS NATIONAL PARK DRAFT MANAGEMENT PLAN 2021

State Government

Department of Health
Department of Planning, Lands and Heritage
Department of Primary Industries and Regional Development
Heritage Council of Western Australia
Minister for Tourism
Tourism Western Australia
Western Australian Museum

Local Government

City of Greater Geraldton

Conservation interests

Birdlife Midwest-Geraldton
Conservation Council of Western Australia
Halfmoon Biosciences
Houtman Abrolhos Islands Conservation Network
Mission Blue
Northern Agricultural Catchments Council
A. Burbidge
M. Clarke
A. Guinness
R. How
D. James
R. Johnston

Other non-government organisations

Recfishwest
Midwest Chamber of Commerce

Tourism industry

Blue Juice Tours Pty Ltd
Eco Abrolhos
Marine Tourism WA
Keshi Mer Expeditions

Commercial fishing and aquaculture operators

Ruediger Fishing
S. Weldon (North Island Body Corporate)
J. Fitzhardinge (North Island Body Corporate)
S. Sipila
D. & K. Akerstom
S. Ayling

B. Ayling
R. Newbold
G. Robinson
E. Starling

Individuals

P. Inverarity
J. Bertolini
D. Zeller
M. Eves
H. Gray
F. Martin
C. Neilsen
P. Fruin
L. Mitting