# ANALYSIS OF PUBLIC SUBMISSIONS TO THE INDICATIVE MANAGEMENT PLAN FOR THE PROPOSED MONTEBELLO/BARROW ISLANDS MARINE CONSERVATION RESERVES

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### INTRODUCTION

Prior to the gazettal of a marine conservation reserve, the *Conservation and Land Management Act* 1984 requires that the Minister for the Environment release an indicative management plan to provide an opportunity for the community to comment on the proposal. On 17 February 2004, the *Indicative Management Plan for the Proposed Montebello/Barrow Islands Marine Conservation Reserves* was released for public comment.

At this time, advertisements were placed in two editions of *The West Australian, Pilbara News* and *North West Telegraph* to advise that the indicative management plan was available for public comment. The indicative management plan was distributed to State and local Government departments, tertiary institutions, libraries, peak bodies, stakeholder groups and numerous individuals who expressed interest during the planning process. A 'Have Your Say' submission form was produced and distributed with each copy of the indicative management plan to assist the community in preparing a submission. The indicative management plan was available for inspection at the offices and libraries in the Shire of Ashburton, the Shire of Roebourne and the Town of Port Hedland. Copies of the indicative management plan were available at the former Department of Conservation and Land Management (CALM) offices in Kensington, Fremantle and Karratha. Electronic copies of the indicative management plan and submission form were also made available on the Department of Environment and Conservation's (DEC's) NatureBase web site and interested parties were able to lodge a submission electronically.

The public submission period closed on 24 May 2004, although late submissions were accepted. Submissions were assessed entirely on the clarity and reasoning of points raised. No subjective weighting was given to any submission due to its origin or any other factor to elevate its importance above any other submission.

The public submissions to the plan were analysed according to the process below.

- All submissions were recorded in a spreadsheet as they were received and responses summarised and collated according to the section of the indicative plan they addressed.
- A summary of the key issues arising from the submissions was provided to the Marine Parks and Reserves Authority (MPRA) and all submissions were made available to the Authority.
- The MPRA considered the issues raised in the public submissions and then provided advice to the Minister for the Environment.
- The Government then considered this advice and the issues raised during the public submissions period. On 10 December 2004, the Government gazetted the Montebello/Barrow Islands Marine Conservation Reserves. The Government also announced the final decisions with respect to the zoning for these reserves.
- DEC prepared a final management plan to give intent to the Government's decisions and address finer scale issues raised during the public submission period.
- The management plan for the Montebello/Barrow Islands Marine Conservation Reserves was approved by the Minister for the Environment in early 2007.
- The analysis of public submissions was finalised to outline whether the indicative plan was amended in relation to the issues raised in the submissions.
- The management plan and the analysis of submissions were published.

This document outlines how the submissions were summarised, provides an analysis of the public submissions. It also indicates if the indicative plan was amended, and the reasons why or why not, as a result of the public submissions. It should be noted that where submissions raised the same or related issues, these have been amalgamated where appropriate.

### ANALYSIS OF PUBLIC SUBMISSIONS

A total of 20 submissions were received, comprising 16 written, including 1 hard copy submission form, and 4 electronic submissions. A list of the submitters to the indicative management plan is presented in Appendix I. The majority (45%) of the submissions received were from State government while the Commonwealth government made the least number of submissions (1 submission or 5%). No submissions were received from local government (Table 1). The non-government sector that made the most submissions was the commercial industry sector with 3 submissions received, followed by the recreational fishing sector with 2 submissions received. No submissions were received from recreational users, or the conservation and aboriginal interest sectors (Table 2).

#### Table 1: Origin of submissions by organisation type

Organisation Type	Number of Submissions	Percentage (%)
Individuals	2	10
Community Groups	2	10
Commercial	6	30
Local Government	0	0
State Government	9	45
Commonwealth Government	1	5
TOTAL	20	100

#### Table 2: Origin of non-government submissions by sector

Sector	Number of submissions	Percentage (%)
Recreational fishing	2	20
Recreational users (other than fishing)	0	0
Commercial fishing	1	10
Aquaculture and pearling	1	10
Commercial industry	3	30
Commercial tourism	1	10
Conservation	0	0
Aboriginal interests	0	0
Unknown	2	20
TOTAL	10	100

The analysis of public submissions to the *Indicative Management Plan for the Proposed Montebello/Barrow Islands Marine Conservation Reserves* is presented in Table 3.

The analysis contains:

- a summary of each major issue or point raised and the number of submissions that raised the issue;
- an indication of whether or not the comment resulted in an amendment to the final management plan and the criteria by which each comment was assessed; and
- a brief statement responding to the comment and, if appropriate, indicating what action was taken to amend the final plan.

The criteria referred to in Table 3 are detailed below:

- 1. The plan **was amended** if a submission:
  - a) provided additional resource information of direct relevance to management;
  - b) provided additional information on affected user groups of direct relevance to management;
  - c) indicated a change in (or clarified) government legislation, management commitment or management policy;
  - d) proposed strategies that would better achieve management objectives and aims; or
  - e) indicated omissions, inaccuracies or a lack of clarity.
- 2. The plan **was not amended** if the submission:
  - a) clearly supported the draft proposals;
  - b) offered a neutral statement or no change was sought;
  - c) addressed issues beyond the scope of the plan;
  - d) made points that were already in the plan or were considered during its preparation;
  - e) was one amongst several widely divergent viewpoints received on the topic and the strategy of the plan was still considered the best option; or
  - f) contributed options which are not possible (generally due to some aspect of existing legislation or Government policy).

It should be noted that minor editorial changes (e.g. spelling mistakes, grammar and formatting) referred to in the submissions have also been made to the plan.

# Table 3: Analysis of public submissions

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION
Genera	al Comments		
1	Support for, or no objections to, the indicative management plan ( <b>4 submissions</b> ).	No (2a)	Supportive.
2	Full support for the proposed Montebello Islands Marine Park ( <b>2 submissions</b> ).	No (2a)	Supportive.
3	Full support for the proposed Barrow Island Marine Park ( <b>2 submissions</b> ).	No (2a)	Supportive.
4	Full support for the proposed Barrow Island Marine Management Area (2 submissions).	No (2a)	Supportive.
5	The plan provides a comprehensive framework for future management of the area ( <b>1 submission</b> ).	No (2a)	Supportive.
6	Support the Government's initiative in preparing for marine reserves in the Montebello/Barrow Islands area ( <b>1 submission</b> ).	No (2a)	Supportive.
7	Full support for the proposed recreation zones (1 submission).	No (2a)	Supportive.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (Criteria)	DISCUSSION/ACTION		
8	Seek assurance that implementation of the final management plan will not limit the ability for the Gorgon Gas Project to be developed. Request that we be consulted and participate in the finalisation of the plan and any associated ecological targets in the marine management area where the potential to impact upon the Gorgon Gas Project may occur ( <b>1 submission</b> ).	Yes (1c)	The plan was amended to make reference to the <i>Barrow Island Bill 2003</i> . Future projects associated with the Gorgon Gas Project were considered in the development of the indicative management plan and zoning scheme, and amendments were made to the zoning scheme. In addition, the development of quantitative management targets for geomorphology, water quality, sediment quality and marine habitats will be finalised early in the life of the management plan in consultation with peak stakeholder bodies.		
Manag	ement Framework				
9	The definition of social values – " those cultural, aesthetic, recreational and economic characteristics for which the area is significant or well known" – should be broadened i.e. we should not assume that all social values are well known and understood ( <b>1 submission</b> ).	No (2d)	It was acknowledged within the planning process that there are gaps in understanding about social values and human usage. The plan contains research and monitoring strategies that attempt to address these aspects.		
Montel	Montebello Islands Marine Park – Definition of the Area and Reserve Tenure				
10	Disagree with the reserve category for the Montebello Islands Marine Park on the grounds that it is inadequate for long-term protection ( <b>1 submission</b> ).	No (2e)	Marine park is considered the best reserve category to give effect to the vision and objectives that were developed through the community advisory committee and reserve planning process. A significant area in the marine park is afforded a high level of protection in sanctuary zones.		

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION
11	Marine nature reserve is a more appropriate category ( <b>1 submission</b> ).	No (2e)	Marine park is considered the best reserve category to give effect to the vision and objectives that were developed through the community advisory committee and reserve planning process. A significant area in the marine park is afforded a high level of protection in sanctuary zones.
12	Disagree with the boundary of the Montebello Islands Marine Park as it fails to capture ecological processes occurring outside the jurisdiction. Include the deeper water systems that lie in Australian Territorial Waters (outside State waters) in the proposed reserves ( <b>1 submission</b> ).	No (2f)	Western Australian marine conservation reserves can only be established within state waters.
Barrov	v Island Marine Park - Definition of the Area and Reserve Tenur	e	
13	Agree with the reserve category for the Barrow Island Marine Park ( <b>1 submission</b> ).	No (2a)	Supportive.
14	Disagree with the boundary of the Barrow Island Marine Park. Boundaries need to be amended to include a larger area in the marine park (sanctuary zone) to provide protection from activities in the surrounding multiple use area ( <b>1 submission</b> ).	Yes (1d)	As a result of a range of considerations, the sanctuary zone was extended to the shoreline and 100% of the marine park is now included in sanctuary zone.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION
15	Disagree with the reserve category for the area categorised as a general use zone within the Barrow Island Marine Park due to the likelihood that this area may include several pipelines and offshore tie-ins. The proposed reserve category may constrain development of this or future projects. Recommend that the triangular general use zone north of the Western Barrow Island Sanctuary Zone be rezoned as a marine management area ( <b>2 submissions</b> ).	Yes (1d)	The general use zone north of Western Barrow Island Sanctuary Zone was amended to form part of the unzoned area of the marine management area. The area proposed as a general use zone shoreward of the Western Barrow Island Sanctuary Zone was included within the sanctuary zone. This is an area of high conservation value for sea turtle nesting, mating, resting and provides representative areas of the nearshore habitat.
Barrow	Island Marine Management Area - Definition of the Area and F	Reserve Tenure	
16	Disagree with the reserve category for the Barrow Island Marine Management Area as the level of protection is not enough to meet conservation objectives ( <b>1 submission</b> ).	No (2e)	The marine management area is still considered the best reserve category.
17	Agree with the reserve category for the Barrow Island Marine Management Area (1 submission).	No (2a)	Supportive.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (Criteria)	DISCUSSION/ACTION
18	Disagree with the boundary of the Barrow Island Marine Management Area. Proposed boundaries should be extended south to include coastal waters and systems i.e. Mary Anne Group ( <b>1 submission</b> ).	No (2e)	The boundaries outlined in the plan are a result of extensive consideration and fine-tuning following community, stakeholder and agency input and are considered an appropriate balance to achieve the stated objectives.
19	Disagree with the boundary of the Barrow Island Marine Management Area. The ports at Barrow and Varanus islands, which are vested with the Minister for Planning and Infrastructure, should be excluded from the marine management area due to the potential to result in double-vesting of the area ( <b>4 submissions</b> ).	Yes (1c)	Varanus Island Port and Barrow Island Port were excluded from the reserves based on legal advice from the State Solicitors' Office that 'dual vesting' or overlap should be avoided. The boundaries of these ports will be reviewed in the future to include areas of high conservation value not required for port activities in the marine conservation reserves.
Vision			
20	Support the vision statement for the proposed reserves (1 submission).	No (2a)	Supportive.
21	The vision statement and strategic objectives should state some broad sustainability principles e.g. transparency, community consultation, the precautionary principle ( <b>1 submission</b> ).	No (2d)	Sustainability principles are inherent in the vision and strategic objectives.
Strateg	ic Objectives		
22	Agree with the strategic environmental objectives for the proposed reserves ( <b>3 submissions</b> ).	No (2a)	Supportive.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION
23	Disagree with the strategic social objectives for the proposed reserves. Human centred values are given disproportionate weighting ( <b>1 submission</b> ).	No (2e)	It was acknowledged within the planning process that there are gaps in understanding about social values and human usage. The plan contains research and monitoring strategies that attempt to address these aspects.
Develop	oment of a Management and Administrative Framework & Pern	nitted Activities	
24	Request that Table 2 (under the heading of 'Other Uses') specify that Military Flight Training in restricted airspace R852A and R852B be allowed in all zones of the proposed reserves ( <b>1 submission</b> ).	Yes (1e)	The plan was amended to reflect that military flight training above 10,000 ft is permitted in all zones of the reserves.
25	Activities such as mineral and petroleum exploration and motor sports allowed in the sanctuary zones could have an impact on these areas ( <b>1 submission</b> ).	No (2b)	Neutral statement/no change sought.
26	Strongly endorse the restriction of commercial operators (except charter vessels – other) in the area ( <b>1 submission</b> ).	No (2a)	Supportive.
27	Petroleum drilling, mineral development and seismic exploration should be changed from 'assess' to 'no access' because these activities could have serious ramifications on tourism ( <b>1 submission</b> ).	No (2e)	The permitted activities outlined in the plan are still considered the best option. Such activities will be required to be assessed by the appropriate government regulatory agencies.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION
28	The proposed configuration of zones makes it difficult for people to navigate the area and could contribute to the plan not being taken seriously ( <b>1 submission</b> ).	No (2e)	The zone boundaries have been placed, wherever possible, for ease of use and compliance. As such, the zoning scheme outlined in the plan is considered appropriate.
29	Commercial aquarium collecting should be a permitted activity in the special purpose (pearling) zones ( <b>1 submission</b> ).	No (2d)	The permitted activities outlined in the plan are considered appropriate to give effect to the objectives for the reserves.
30	Supportive of the proposal to 'assess' the suitability of petroleum related activities in the unzoned areas of the marine management area ( <b>1 submission</b> ).	No (2a)	Supportive.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION
31	The activity of 'Dredging and dredge spoil dumping for shipping activities' is classified as 'No' in the conservation areas of the marine management area, which conflicts with the activity of 'Petroleum pipelines' which is classified as 'Assess'. Whilst both of the conservation areas were to accommodate petroleum activities, dredging and dredge spoil dumping that is sometimes required to accommodate petroleum pipelines is not permitted. Recommend amending permitted activities for 'Dredging and dredge spoil dumping or shipping activities' from 'No' to 'assess'. 'Petroleum pipelines' should be broadened to be inclusive of gas processing pipelines or water pipelines by replacing with 'Pipelines' ( <b>1 submission</b> ).	Yes (1c)	The plan does not prohibit dredging activities for petroleum pipelines. The plan was amended to clarify that the activity 'Pipelines' includes gas or water pipelines and dredging for pipelines.
32	In the last paragraph of section 7.2.1, the second last sentence states that " drilling for petroleum exploration or production is not permitted inspecial purpose (pearling) zones." Seeks clarification where there is inconsistency between the permitted activities table and Table 1 in the Memorandum of Understanding, where drilling is permitted within special purpose zones subject to assessment under the <i>Environmental Protection Act 1986</i> . Recommends removing the reference to special purpose (pearling) zones in the sentence ( <b>1 submission</b> ).	No (2d)	Issues raised were previously considered in the preparation of the indicative management plan. The permitted activities table overrides the more generic management arrangements outlined in the Memorandum of Understanding.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION
Zones i	n the Montebello Islands Marine Park		
33	Disagree with the zoning in the Montebello Islands Marine Park. ( <b>1 submission</b> ).	No (2e)	The zoning outlined in the plan is still considered the best option.
34	Supportive of the nominated zoning arrangements in the proposed Montebello Islands Marine Park ( <b>1 submission</b> ).	No (2a)	Supportive.
35	Western reef system currently in general use zone should be zoned as sanctuary ( <b>1 submission</b> ).	No (2e)	The boundaries outlined in the plan are a result of extensive consideration and fine-tuning following community, stakeholder and agency input and are considered an appropriate balance to achieve the stated objectives Portions of this reef system are included in sanctuary zones.
36	The recreation zones and special purpose (pearling) zone within the Southern Montebellos Sanctuary Zone should be sanctuary zones ( <b>1 submission</b> ).	No (2d)	This issue was considered during the planning process but, given the existing human use in the area, the zoning scheme outlined in the plan is considered appropriate.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (Criteria)	DISCUSSION/ACTION
37	The Southern Montebellos Sanctuary Zone should be adjusted to allow for commercial aquarium collecting to operate in the sheltered western lagoon waters between the outer reef and Hermite Island (specific amendment suggested) ( <b>1 submission</b> ).	No (2e)	The boundaries outlined in the plan are a result of extensive consideration and fine-tuning following community, stakeholder and agency input and are considered an appropriate balance to achieve the stated objectives. Commercial aquarium collecting is permitted in a portion of this lagoonal habitat.
38	The Morgan and Co. lease areas E, F, K and L or any other increase in the area leased for pearl faming are unacceptable on the grounds of potential negative impacts on the ecological and social values of the reserves ( <b>1 submission</b> ).	No (2b)	Government is currently considering lease areas E, F, K and L. The pearling industry is considered environmentally benign and the plan outlines various strategies to ensure significant impacts do not occur to the ecological values (e.g. development of codes of practice, monitoring programs, license conditions for new pearling proposals etc.).
39	A comprehensive survey of all pearl lease areas (including proposed areas) should be conducted before these areas are allocated for pearling to assess whether the areas include habitat not represented in other sanctuary zones ( <b>1 submission</b> ).	No (2e)	The plan outlines strategies to develop habitat maps for the proposed reserves. This will identify any 'gaps' in the representation of habitats in sanctuary zones. A review of lease areas E, F, K, and L is proposed as a management strategy.
40	Select alternative locations of deep water (subtidal reef – seaward) habitats away from the popular fishing areas ( <b>1 submission</b> ).	Yes (1b)	Alternative placement of sanctuary zone was considered during the planning process. However, the zoning scheme was modified by making the north west corner of the Northern Montebellos Sanctuary Zone a special purpose (benthic protection) zone to allow for trolling.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (Criteria)	DISCUSSION/ACTION
41	Amend the boundary of the Northern Montebellos Sanctuary Zone (specific amendment suggested on map) to allow trolling access to pelagic fishing areas as a no-anchoring special purpose zone ( <b>2 submissions</b> ).	Yes (1b)	The amendment proposed would result in a loss of approximately two thirds of this sanctuary zone, including representative subtidal seaward reef habitats to the north and west. However, the zoning scheme was modified by making the north west corner of the Northern Montebellos Sanctuary Zone a special purpose (benthic protection) zone to allow for trolling.
42	Amend the boundary of the Southern Montebellos Sanctuary Zone to allow fishing activity (specific amendment suggested) ( <b>1 submission</b> ).	Yes (1b)	The amendment proposed would result in a loss of approximately half of this sanctuary zone including representative subtidal seaward and leeward reef habitats to the west and east. However, the zoning scheme was modified by amending the western part of the Southern Montebellos Sanctuary Zone to general use zone to allow for recreational fishing activity.
43	Amend the boundary of the Southern Montebellos Recreation Zone (specific amendment proposed on map) to allow for circumnavigation fishing access around Ah Chong Island ( <b>1 submission</b> ).	No (2e)	The boundaries outlined in the plan are a result of extensive consideration and fine-tuning following community, stakeholder and agency input and are considered an appropriate balance to achieve the stated objectives As such, the zoning scheme outlined in the plan is considered appropriate.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (Criteria)	DISCUSSION/ACTION
44	Designate the whole of the main Stephenson's Channel (both upper and lower reaches – as specified on map) as recreation zone (except mangrove areas) and develop alternative strategies to specifically protect the mangroves ( <b>1 submission</b> ).	No (2e)	Stephenson's Channel includes representative sand shoal, mangrove, and subtidal reef habitats. The zoning scheme in the plan is still considered the best option. A portion of Stephenson's Channel is designated as recreation zone.
45	Reduce the area proposed as the Southern Montebellos Sanctuary Zone to provide greater access for recreational fishing. The proposed allocation is seen as excessive for the purpose of research 'benchmarking' ( <b>1 submission</b> ).	Yes (1b)	Alternative placement of sanctuary zones was considered during the planning process. However, the zoning scheme was modified by amending the western part of the Southern Montebellos Sanctuary Zone to general use zone to allow for recreational fishing activity. Sanctuary zones are not only for research 'benchmarking' but have a range of functions.
Zones i	in the Barrow Island Marine Park		
46	Supportive of the nominated zoning arrangements in the proposed Barrow Island Marine Park ( <b>1 submission</b> ).	No (2a)	Supportive.
47	Disagree with the zoning scheme. The outer boundary and zoning needs to be amended to include a larger area in the sanctuary zone to provide protection from activities in the surrounding multiple use area ( <b>1 submission</b> ).	Yes (1d)	The outer boundary proposed in the plan is considered to be the best option. However, the area proposed as a general use zone shoreward of the Western Barrow Island Sanctuary Zone has been included within the sanctuary zone. This is an area of high conservation value for sea turtle nesting, mating, resting and provides representative areas of the nearshore habitat.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION
48	Amend the boundary of the Western Barrow Island Sanctuary Zone to follow the 10 metre contour line, with alternative subtidal reef habitats selected elsewhere away from popular fishing areas ( <b>1 submission</b> ).	No (2e)	The boundaries outlined in the plan are a result of extensive consideration and fine-tuning following community, stakeholder and agency input and are considered an appropriate balance to achieve the stated objectives As such, the zoning scheme outlined in the plan is considered appropriate.
49	The north eastern edge of the proposed Western Barrow Island Sanctuary Zone lies within 12 m of the proposed export pipeline for the Gorgon Gas Project. Recommend amending the north eastern boundary of the Western Barrow Island Sanctuary Zone to align 750 m to the south west (as shown on map) ( <b>2 submissions</b> ).	Yes (1d)	The general use zone north of Western Barrow Island Sanctuary Zone was amended to form part of the unzoned area of the marine management area. The area proposed as a general use zone shoreward of the Western Barrow Island Sanctuary Zone was included within the sanctuary zone. This is an area of high conservation value for sea turtle nesting, mating and resting, and provides representative areas of the nearshore habitat.
Zones i	n the Barrow Island Marine Management Area	I	
50	Support the nominated zoning arrangements in the proposed Barrow Island Marine Management Area ( <b>1 submission</b> ).	No (2a)	Supportive
51	Disagree with the zoning in the Barrow Island Marine Management Area. Having 86% multiple use is inadequate for a vision of " maintain and improve the marine flora and fauna " ( <b>1 submission</b> ).	No (2e)	The suggested zoning scheme is considered to be the best option.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (Criteria)	DISCUSSION/ACTION
52	The area from Surf Point to the bay south of Boomerang Island (the most important area being from Surf Point to the headland south of Square Bay) be set aside as a sanctuary zone in from the high tide zone to a depth of 10 m to include areas representative of the east coast intertidal platforms and shallow subtidal areas ( <b>1 submission</b> ).	No (2f)	This area is within the Barrow Island Port, which is not part of the marine management area.
53	Note the likelihood that petroleum permits surrounding Barrow Island (e.g. Pasco field, Perente South and Biggada Gas Field) will require a pipeline constructed through the proposed Bandicoot Bay Conservation Area. Seek assurance that the implementation of the marine management area will not preclude any responsible exploration and production activities in the area ( <b>1 submission</b> ).	No (2d)	The permitted activities table shows the requirement to assess petroleum activities, including pipelines, occurring in the Bandicoot Bay Conservation (benthic fauna/ seabird protection) Area. There will not be additional layers of assessment or regulation applied.
54	Amend the Bandicoot Bay Conservation Area from Stokes Point several hundreds metres to the north west to another prominent point to avoid inclusion of a likely shore line pipeline crossing in the special purpose zone ( <b>1 submission</b> ).	No (2d)	The zoning scheme outlined in the plan is still considered to be the best option. Pipeline proposals in the conservation area will be assessed.
55	The Fantome Pearls lease north of Parakeelya Island is disproportionately large and needs to be assessed in terms of its specific use to pearling so that the remainder can become part of the general use zone ( <b>1 submission</b> ).	No (2e)	The Fantome Pearls lease north of Parakeelya Island lies within the unzoned area of the Barrow Island Marine Management Area.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION
Educat	ion and Interpretation		
56	Agree with the management strategies (1 submission).	No (2a)	Supportive.
Public	Participation		
57	Agree with the management strategies (1 submission).	No (2a)	Supportive.
Patrol	and Enforcement		
58	Agree with the management strategies (1 submission).	No (2a)	Supportive.
59	Surveillance and enforcement strategies will be very difficult to implement with limited operational resources ( <b>1 submission</b> ).	No (2d)	Government has committed new funds for implementation of the plan and ongoing management of the Park.
60	Sanctuary zones need to be clearly marked on charts and on the ground to ensure compliance and these need to be checked frequently by rangers ( <b>1 submission</b> ).	Yes (1d)	The plan identifies generic administration strategies regarding informing users about zones to ensure compliance. The plan was amended to include a strategy in section 7.5 (management intervention & visitor infrastructure) to implement a program of routine inspection, maintenance and reporting on infrastructure (e.g. zone markers) to ensure that zones are clearly marked.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION		
61	Support cross authorisation and training of DEC officers as Honorary Fisheries Officers (1 submission).	No (a)	Supportive.		
Manage	ement Intervention & Visitor Infrastructure				
62	Agree with the management strategies (1 submission).	No (2a)	Supportive.		
63	Direct management intervention strategies will be very difficult to implement with limited operational resources ( <b>1 submission</b> ).	No (2d)	Government has committed new funds for implementation of the Plan and ongoing management of the Park.		
Researc	ch				
64	Agree with the management strategies (1 submission).	No (2a)	Supportive.		
65	Support contributions to the knowledge base of the Montebellos environment through research and monitoring programs and data collection ( <b>1 submission</b> ).	No (2a)	Supportive.		
Monito	Monitoring				
66	Agree with the management strategies (1 submission).	No (2a)	Supportive.		
67	Monitoring of finfish and invertebrates will require additional resourcing ( <b>1 submission</b> ).	No (2b)	Government has committed new funds for implementation of the Plan and ongoing management of the Park.		

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION	
Develo	opment Proposals Within the Reserves			
68	Agree with the management strategies (1 submission).	No (2a)	Supportive.	
Ecolog	ical and Social Values			
69	The management objectives for all activities are clear and provide specific strategies and timeframes required to achieve results ( <b>1 submission</b> ).	No (2a)	Supportive.	
70	Performance measures, management targets and key performance indicators for the management of ecological and social values should be determined before the plan is finalised ( <b>1 submission</b> ).	No (2d)	Quantitative targets for geomorphology, water quality, sediment quality and marine habitats in the unzoned areas of the marine management area will be developed in consultation with stakeholders early in the life of the management plan.	
71	Agree with the proposed management strategies for the ecological and social values ( <b>1 submission</b> ).	No (2a)	Supportive.	
Ecolog	Ecological Values			
72	Agree with the management targets for ecological values (2 submissions).	No (2a)	Supportive.	

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (Criteria)	DISCUSSION/ACTION
73	Support the position that habitat targets in the indicative management plan should be expressed in a qualitative manner initially and that quantitative targets for habitat disturbance will be developed prior to the finalisation of the management plan, or at some point soon after gazettal ( <b>1 submission</b> ).	No (2a)	Supportive.
74	Recommend that CALM commit to detailing of qualitative targets for habitat disturbance in the plan until agreement on quantitative targets has been finalised to the satisfaction of both parties ( <b>1 submission</b> ).	No (2d)	The plan states that the development of quantitative management targets for marine habitats will be finalised early in the life of the management plan in consultation with peak stakeholder bodies. The development of interim qualitative targets is not considered necessary.
75	We request to be consulted and invited to participate in the finalisation of the plan and any associated ecological targets in the marine management area where they have the potential to impact upon the development of petroleum projects ( <b>1 submission</b> ).	No (2d)	Supportive. The development of quantitative management targets for geomorphology, water quality, sediment quality and marine habitats will be finalised early in the life of the management plan in consultation with peak stakeholder bodies.
76	Propose that the plan promotes the position that a focus group would develop implementation guidelines and develop collaborative projects to enhance scientific knowledge and joint management and conservation of the area ( <b>1 submission</b> ).	No(2e)	The plan proposes the establishment of a Management Advisory Committee to provide advice and assistance to DEC and the MPRA on management issues.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION		
77	Subtidal soft substrate communities should be identified as a value and included in section 7.1 [Ecological Values] (1 submission).	Yes (1a)	The plan was amended to include subtidal soft- bottom communities as an ecological value.		
78	The habitat mapping, particularly in reference to subtidal soft substrate communities (in plan as macroalgae on limestone between Trimouille Island and islands to the west), is not consistent with observations made by our organisation ( <b>1</b> <b>submission</b> ).	No (2d)	The plan has identified that the development of a detailed habitat distribution map for the reserves is a high priority key management strategy.		
79	There are errors in the habitat mapping for the east coast of Barrow Island (particularly in the vicinity of the Gorgon Gas proposal) ( <b>1 submission</b> ).	No (2d)	The plan has identified that the development of a detailed habitat distribution map for the reserves is a high priority key management strategy.		
Geomo	rphology				
80	Agree with the management strategies (1 submission).	No (2a)	Supportive.		
81	Agree with the management targets (2 submissions).	No (2a)	Supportive.		
Sedime	Sediment Quality				
82	Agree with the management strategies (1 submission).	No (2a)	Supportive.		
83	Agree with the management targets (2 submissions).	No (2a)	Supportive.		

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION		
Water	Quality				
84	Agree with the management strategies (1 submission).	No (2a)	Supportive.		
85	Agree with the management targets (2 submissions).	No (2a)	Supportive.		
Coral F	Reef Communities				
86	Agree with the management strategies (1 submission).	No (2a)	Supportive.		
87	Agree with the management targets (2 submissions).	No (2a)	Supportive.		
88	Suggest that global changes that will impact on reefs and communities on a local scale e.g. global warming be included as a potential pressure ( <b>1 submission</b> ).	No (2c)	Marine conservation reserves are not proposed as a management strategy to ameliorate the impacts of global warming and cannot manage for pressures on a global scale.		
Mangro	Mangrove Communities				
89	Agree with the management strategies (1 submission).	No (2a)	Supportive.		
90	Agree with the management targets (2 submissions).	No (2a)	Supportive.		

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION
Macroa	algal and Seagrass Communities		
91	Agree with the management strategies (1 submission).	No (2a)	Supportive.
92	Agree with the management targets (2 submissions).	No (2a)	Supportive.
93	Floristic information of seagrass species present in the area has omitted <i>Thalassodendron ciliatum</i> , which is known to occur at Parakeelya Island. Minor <i>Halophila</i> species apart from <i>H. ovalis</i> and <i>H. spinulosa</i> occur ( <b>1 submission</b> ).	Yes (1a)	The plan was amended to include the additional seagrass species.
94	The plan should recognise the importance of algal communities of value to the green turtles including <i>Rhodophyta</i> ( <b>1 submission</b> ).	Yes (1a)	The plan was amended to include the value of <i>Rhodophyta</i> as a food source for the green turtle.
95	Trawling or dredging in any form is extremely destructive of this habitat and should be listed in the 'Existing and potential uses and/or pressures' ( <b>1 submission</b> ).	Yes (1a)	The list of existing and potential pressures was updated to include commercial trawling. Dredging was already included in the list. Although trawling is permitted in some zones of the reserves this activity does not occur to a large extent. The plan recommends strategies to determine the levels and effects of commercial fishing activity in the reserves and review management controls where required.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION
Intertio	lal Sand/Mudflat Communities		
96	Agree with the management strategies (1 submission).	No (2a)	Supportive.
97	Agree with the management targets (2 submissions).	No (2a)	Supportive.
Rocky	Shore/Intertidal Reef Platform Communities		
98	Agree with the management strategies (1 submission).	No (2a)	Supportive.
99	Agree with the management targets (2 submissions).	No (2a)	Supportive.
Marine	Mammals		
100	Agree with the management strategies (1 submission).	No (2a)	Supportive.
101	Agree with the management targets (2 submissions).	No (2a)	Supportive.
102	The planning maps have not accurately portrayed areas clearly occupied by the resident dugong populations, especially off the north east of Barrow Island ( <b>1 submission</b> ).	No (2d)	It is acknowledged in the plan that more information is required on dugong populations in the area. One of the management strategies is to further quantify both the regional significance of the Montebello/Barrow islands areas and the relative importance of areas contained within the reserve for dugongs.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION
103	Recommend that the plan be amended to highlight the area's status as a hotspot habitat for the dugong of the Pilbara coastal region ( <b>1 submission</b> ).	No (2d)	The plan identifies the reserve as containing significant areas for dugongs. One of the management strategies is to further quantify both the regional significance of the Montebello/Barrow islands areas and the relative importance of areas contained within the reserve for dugongs.
104	There is a need to improve understanding of the significance of the seagrass communities as a foraging resource for turtles and dugong populations ( <b>1 submission</b> ).	No (2d)	The plan has already considered these issues and outlines strategies to develop habitat maps for the reserves and to ascertain the importance of areas within the reserve for turtles and dugongs.
Turtles			
105	Agree with the management strategies (1 submission).	No (2a)	Supportive.
106	Agree with the management targets (2 submissions).	No (2a)	Supportive.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION
107	The significance of the Barrow Island West (including Middle and Boodie island locations) and east coast breeding aggregations (green turtle on the west coast, and flatback turtle on the mid-east coast) has been overlooked. The important breeding grounds of the Montebello and Lowendal island groups to both these species and the hawksbill turtle and loggerhead turtle should also be recognised. Management strategies should consider seasonal restrictions to provide protection to populations at breeding periods when they are considered to be most susceptible to disturbance ( <b>1 submission</b> ).	Yes (1e)	The plan was amended to include significant marine turtle nesting and aggregation areas in the reserves. A strategy regarding seasonal closures was also included.
Seabird	ls		
108	Agree with the management strategies (1 submission).	No (2a)	Supportive.
109	Agree with the management targets (2 submissions).	No (2a)	Supportive.
Finfish			
110	Agree with the management strategies (1 submission).	No (2a)	Supportive.
111	Agree with the management targets (2 submissions).	No (2a)	Supportive.
112	Monitoring of finfish will require additional resources ( <b>1 submission</b> ).	No (2b)	Government has committed new funds for implementation of the Plan and ongoing management of the reserves.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (CRITERIA)	DISCUSSION/ACTION
113	The plan needs to recognise that management strategies for the protection of finfish, which will not be extracted, will be developed by the Department of Fisheries in consultation ( <b>1 submission</b> ).	No (2a)	Supportive. The plan identifies Department of Fisheries as having a key role in implementing management strategies.
Inverte	brates		
114	Agree with the management strategies (1 submission).	No (2a)	Supportive.
115	Agree with the management targets (2 submissions).	No (2a)	Supportive.
116	Propose to amend the statement " <i>comprises tropical species which are common throughout the Indo-West pacific region</i> " to reflect that there is a considerable component of north-western Australian endemic species and northern Australian inshore species, some of them rare ( <b>1 submission</b> ).	Yes (1a)	The plan was amended to reflect that the area also supports north-western Australian endemic invertebrate species and northern Australian inshore invertebrate species, some of them rare.
117	Commercial species of beche de mer have been heavily over- fished in most parts of the tropics and strong measures are needed to protect them in areas such as the Montebello Islands ( <b>1 submission</b> ).	No (2d)	The plan includes strategies to determine the levels and effects of commercial fishing and to monitor and report on catch/effort in the reserves. In addition the plan also includes long-term management targets for targeted invertebrate species. Significant areas are protected in sanctuary zones.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION		
118	Monitoring of invertebrates will require additional resourcing ( <b>1 submission</b> ).	No (2b)	Government has committed new funds for implementation of the Plan and ongoing management of the Park.		
119	The plan needs to recognise that management strategies for the protection of invertebrates that are not extracted will be developed by the Department of Fisheries in consultation ( <b>1 submission</b> ).	No (2a)	Supportive. The plan identifies Department of Fisheries as having a key role in implementing management strategies.		
Social V	Values				
120	Agree with the management targets for social values ( <b>1 submission</b> ).	No (2a)	Supportive.		
121	Amend summary of social values (p12). Amend sentence ending with " State's oil production" to include " and Varanus Island producing 25% of Western Australia's domestic natural gas demand and 100% of the natural gas requirements for the industrial users drawing from the inland Goldfields gas pipeline" ( <b>1 submission</b> ).	Yes (1a)	The plan was amended to reflect domestic gas production from Varanus Island in the <i>Hydrocarbon exploration and production industry</i> .		
Hydroc	Hydrocarbon Exploration and Production Industry				
122	Agree with the management strategies (1 submission).	No (2a)	Supportive.		
123	Agree with the management targets (1 submission).	No (2a)	Supportive.		

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (Criteria)	DISCUSSION/ACTION
124	Should acknowledge the significance of the Carnarvon Basin as Australia's most important petroleum region, with petroleum levels now exceeding those of the Bass Strait fields where Australia has previously relied upon to meet its hydrocarbon demand ( <b>1 submission</b> ).	No (2d)	The North West Shelf is referred to in the plan and additional reference to the Carnarvon Basin was considered to be unnecessary. While production of gas from the Carnarvon Basin exceeds that of Bass Strait, this is not the case for oil or condensate.
125	Amend the reference on page 44 that states that over 275 million barrels of oil have been produced from the Barrow Island oil fields. The correct figure is now over 300 million ( <b>1 submission</b> ).	Yes (1e)	The plan was amended.
126	Seek acknowledgment in the plan that the operators of Barrow and Varanus islands oil fields are responsible operators whose stewardship of the environmental values in the region have preserved a resource upon which this plan has been developed ( <b>1 submission</b> ).	No (2d)	The text in the plan was considered the best option.
127	Amend value and update the sentences commencing with " the projects comprise the Harriet, Agincourt " to include " Gipsy, Gudrun, Victoria, Simpson, Gibson, Double Island, and Monet." Remove reference to the Rosette field ( <b>1 submission</b> ).	Yes (1e)	The plan was amended.
128	Amend strategies which read: "Ensure the hydrocarbon industry is informed of management objectives and targets" with: "Ensure the hydrocarbon industry is consulted and participates in the development of management objectives and targets" (2 submissions).	No (2d)	The consultative planning processes ensured that the hydrocarbon industry was consulted and participated in the development of management objectives and targets.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (Criteria)	DISCUSSION/ACTION
129	Amend strategies which read "Ensure licence conditions of approved petroleum industry projects include" with: "Ensure the petroleum industry is consulted and in agreement when setting licence conditions consistent with management plans and targets in the management plan for approved petroleum industry projects" (1 submission).	No (2f)	Setting of licence conditions for proposed developments is undertaken by the Environment Protection Authority.
130	Include description of Barrow Island Port and the Varanus Island Port in the background section. The following wording is suggested: "The Barrow Island Joint Venture operates a port facility on the east coast of the island. The port was constructed to support Barrow Island's oil field that began production in 1967 and consists of a sub sea pipeline and offshore tanker mooring and load out facility. Apache Energy also operates a port facility surrounding the entire Varanus Island. The port was constructed in 1986 and supports Apache Energy's operations to the northeast, northwest and west of the island. Like the Barrow Island Port Facility, the Varanus Island facility consists of a sub sea pipeline and offshore tanker mooring and load out facility. Both ports also have a materials handling barge-landing facility" ( <b>1 submission</b> ).	Yes (1e)	The plan was amended to incorporate the suggested text.
Pearlin	g		
131	Agree with the management strategies (2 submissions).	No (2a)	Supportive.
132	Agree with the management targets (1 submission).	No (2a)	Supportive.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION			
133	The allocation of resources to pearling is inequitable. Support the review of lease areas (K, F, E and D) as to their suitability ( <b>2 submissions</b> ).	Yes (1b)	The proposed review of pearling leases is supported in the indicative management plan with the inclusion of Area D for review. The plan was amended to include an explicit management strategy to review pearling leases in the reserves and rationalise these areas where appropriate in liaison with the MPRA and pearl producers.			
134	Suggest adding a paragraph to the 'Requirements' on page 48 to allow access between special purpose (pearling) zones for pearl culture vessels and the ability for pearl farm seaplanes to land/take off within or adjacent to the zones ( <b>1 submission</b> ).	Yes (1e)	The plan was amended to clarify access conditions for pearl culture vessels and seaplanes.			
135	Suggest adding a paragraph to the 'Requirements' on page 48 to establish a formal consultation committee between the reserves management and pearling companies to consider any matter of mutual interest and to coordinate research and monitoring programs ( <b>1 submission</b> ).	No (2d)	Liaison between DEC, MPRA and stakeholders will be in the form of a Management Advisory Committee (MAC). The pearling industry will be invited to be a part of this committee. The establishment of a MAC is a key management strategy.			
Nature	Nature-based Tourism					
136	Agree with the management strategies (1 submission).	No (2a)	Supportive.			
137	Agree with the management targets (1 submission).	No (2a)	Supportive.			

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (Criteria)	DISCUSSION/ACTION
138	Petroleum drilling, mineral development and seismic exploration should be changed from 'assess' to 'no access' because these activities could have serious ramifications on tourism ( <b>1 submission</b> ).	No (2e)	The permitted activities outlined in the plan are still considered the best option.
139	Where negative impacts of charter operations are clearly demonstrated, the development of appropriate strategies, in consultation with industry, will be required and we are keen to assist in this process ( <b>1 submission</b> ).	No (2a)	The plan indicates ongoing collaboration with stakeholders in management of the area.
Comme	ercial Fishing		
140	Agree with the management strategies (1 submission).	No (2a)	Supportive.
141	Agree with the management targets (1 submission).	No (2a)	Supportive.
142	Increase fines for commercial fishers who exceed the catch limit or who fish in restricted zones ( <b>1 submission</b> ).	No (2c)	This issue is beyond the scope of the plan. Management of commercial fishing is the responsibility of DoF.
143	All forms of trawling (including prawn trawling) should be totally excluded from the proposed reserves on the grounds of impacts to ecological values ( <b>1 submission</b> ).	No (2e)	Although trawling is permitted in some zones of the reserves this activity does not occur to a large extent. The plan recommends strategies to determine the levels and effects of commercial fishing activity in the reserves and review management controls where required.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (Criteria)	DISCUSSION/ACTION
144	The commercial take of mud crabs should be limited to sustainable levels or preferably restricted to recreational fishers and nature-based tourism operators ( <b>1 submission</b> ).	Yes (1c)	The plan was amended to clarify that in June 2002, the Department of Fisheries imposed a ban on commercial mud crabbing south of King Sound.
145	The review of management controls of all commercial and recreational fishing in Western Australian waters is undertaken by the Department of Fisheries and is not the role of DEC. The plan should delete reference to DEC in commercial and recreational fishing management strategy ( <b>1 submission</b> ).	No (2d)	The plan identifies the Department of Fisheries as the lead agency. However, the component relating to the review of impacts of commercial fisheries upon the ecological values of the park is an issue where DEC has a responsibility.
Recrea	tional Fishing		
146	Agree with the management strategies (2 submissions).	No (2a)	Supportive.
147	Agree with the management targets (1 submission).	No (2a)	Supportive.
148	Increase fines for recreational fishers who exceed the catch limit or who fish in restricted zones ( <b>1 submission</b> ).	No (2c)	This issue is beyond the scope of the plan. Management of recreational fishing is the responsibility of DoF.
149	Excluding recreational fishing from 52% of the Montebello Islands Marine Park is excessive and anglers should be permitted in the proposed southern sanctuary zone of the proposed Montebello Islands Marine Park on account of the low impact from tag and release fishing and compliance with responsible fisheries management ( <b>1 submission</b> ).	Yes (1b)	Adjustments have been made to the boundaries of both the Northern and Southern Montebellos Sanctuary Zones, to allow access for recreational fishing. Approximately 51% of the Park remains open to recreational fishing.

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (Criteria)	DISCUSSION/ACTION		
150	The plan needs to include a definition for recreational fishing specifically in relation to charter fishing customers in recreation zones (i.e. customers fishing from dinghies or the shore) ( <b>1 submission</b> ).	Yes (1d)	The plan was amended to provide clarification on recreational fishing and its relation to individuals departing from charter vessels.		
Water S	Sports	-			
151	Agree with the management strategies (1 submission).	No (2a)	Supportive.		
152	Agree with the management targets (1 submission).	No (2a)	Supportive.		
153	The plan needs to include a definition for low impact recreational activities to ensure that charter vessel anchoring and surfing activities (by customers) could continue in sanctuary zones ( <b>1 submission</b> ).	Yes (1d)	The compatibility of low impact recreational activities in sanctuary zones should be considered on a case by case basis. The plan was amended to include surfing as a permitted activity.		
Europe	European History/Maritime Heritage				
154	Agree with the management strategies (1 submission).	No (2a)	Supportive.		
155	Agree with the management targets (1 submission).	No (2a)	Supportive.		

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION			
Scient	Scientific Research					
156	Agree with the management strategies (1 submission).	No (2a)	Supportive.			
157	Agree with the management targets (1 submission).	No (2a)	Supportive.			
Links	Links with State Environment Reporting					
158	Point out opportunities for linkages with the project ' <i>Community derived marine quality objectives for the North West Shelf</i> ' for definition of Environmental Quality Objectives ( <b>1 submission</b> ).	No 2(a)	These linkages have been discussed with the Environmental Protection section of the Department of Environment and Conservation (formally the Department of Environment).			
Appen	Appendix I: Offshore Memorandum of Understanding					
159	Support the referral arrangements for working in marine conservation reserves. Highlight modifications to Table 1 of the Memorandum of Understanding to align permitted uses in each of the zones for marine parks ( <b>1 submission</b> ).	No (2a)	Supportive. Permitted activities outlined in the indicative management plan take precedence over the Memorandum of Understanding.			
160	Inconsistency between the permitted activities table and the Memorandum of Understanding contained in the Appendices. Recommend that the Memorandum of Understanding be amended to align with Table 2 in relation to permitting seismic activities within sanctuary and recreation zones within marine parks ( <b>1 submission</b> ).	No (2d)	Permitted activities outlined in the indicative management plan take precedence over the more generic management arrangements outlined in the Memorandum of Understanding.			

No.	SUMMARY OF ISSUES / MAJOR POINTS RAISED	Amendment (criteria)	DISCUSSION/ACTION
161	Inconsistency between the permitted activities table and the Memorandum of Understanding contained in the Appendices. Recommend that Table 2 in the proposed plan be amended to be consistent with Table 1 in the Memorandum of Understanding in relation to permitting petroleum pipelines (production development and /or pipelines) within special purpose zones of marine parks ( <b>1 submission</b> ).	No (2d)	Permitted activities outlined in the indicative management plan take precedence over the more generic management arrangements outlined in the Memorandum of Understanding. This activity was considered in the preparation of the indicative management plan and found to be incompatible with the special purpose (pearling) zones at the Montebello Islands.

### APPENDIX I: SUBMITTERS TO THE INDICATIVE MANAGEMENT PLAN

*Individuals* R. Gleadell Mrs B.J. Holmes

Peak Bodies Recfishwest

The Western Australian Game Fishing Association Inc.

Commercial

APPEA Aquarium Specimen Collectors Association of WA Inc. Bowman Bishaw Gorham Charter Boat Owners and Operators Association Chevron Texaco Australia Pty Ltd Morgan & Co Pty Ltd

#### State Government

Department of Conservation and Land Management, Wildlife Research Centre Department of Fisheries Department of Industry and Resources Department of Infrastructure, Planning and Environment (Northern Territory Government) Department for Planning and Infrastructure Environmental Protection Authority Heritage Council of Western Australia Western Australian Museum Western Australian Tourism Commission

Commonwealth Government

Australian Defence Force