



PLAN FOR OUR PARKS
SECURING 5 MILLION HECTARES OVER 5 YEARS



Analysis of Submissions **Fortescue Marsh Nature Reserve** **(Niyaparli Country)**

draft joint management plan 2024

September 2025



Parks and Wildlife Service
Department of Biodiversity, Conservation and Attractions



Conservation and Parks Commission
Department of Biodiversity, Conservation and Attractions



17 Dick Perry Avenue
Technology Park, Western Precinct
KENSINGTON WA 6151

Phone (08) 9219 9000
www.dbca.wa.gov.au

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Front cover photos

Main: Coondiner Pool. Photo – Noel Taylor/KNAC

Top left: Australian bustard (*Ardeotis australis*). Photo – Colin R. Trainor

Top right: Laniflorus jute (*Corchorus laniflorus*). Photo – Adrienne Markey/DBCA

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Public consultation process

The *Fortescue Marsh Nature Reserve (Niyiyaparli Country) joint management plan 2024* (draft plan) was released for public consultation on 16 December 2024 for a two-month public comment period, which closed on 21 February 2025.

Public consultation was promoted by:

- Joint Media statement from Karlka Niyiyaparli Aboriginal Corporation RNTBC and Conservation and Parks Commission on 16 December 2024.
- Notice in the *Government Gazette* on 17 December 2024.
- Advertising in *The West Australian* on 20 December 2024 and 17 January 2025.
- Advertising in *Pilbara News* on 18 December 2024 and 15 January 2025.
- Publishing the draft plan and supporting material on the DBCA website.
- Notifying 40 key stakeholders, including government agencies.
- Providing electronic copies of the draft plan to shires of Ashburton and East Pilbara, and state, national and parliamentary libraries.

Submissions on the *Fortescue Marsh Nature Reserve (Niyiyaparli Country) joint management plan 2024* could be made by:

- Completing the online survey at dbca.wa.gov.au/haveyoursay
- Emailing FMNRjmp@dbca.wa.gov.au
- Writing to the Department of Biodiversity, Conservation and Attractions, Locked Bag 104, Bentley Delivery Centre, WA 6983.

Submission assessment

The comments or key issues identified in each of the submissions received were assessed against the following criteria.

1. The plan **was amended** if the comment:
 - a. provided additional information of direct relevance to management
 - b. indicated a change in (or clarified) government legislation or management policy
 - c. proposed strategies that would better achieve the management objectives
 - d. indicated omissions, inaccuracies, or a lack of clarity.
2. The plan **was not amended** if the comment:
 - a. clearly supported proposals in the draft plan or made general or neutral statements
 - b. referred to issues beyond the scope of the draft plan

- c. referred to issues that are already noted within the draft plan or already considered during its preparation
- d. is one among several widely divergent viewpoints received on the topic but the approach in the draft plan is still considered the best option
- e. contributed options that are not feasible (generally due to conflict with legislation, government policy)
- f. is based on unclear or factually incorrect information.

Overview of submissions

A total of six submissions were received.

The unique responses included three online surveys and three emailed responses. Submissions were received from conservation groups, mining/industry and government sector. Refer to Table 1 for a summary of submissions. All submitters were from Western Australia (Perth region).

Table 1: Source and number of submissions

Source	Number
Conservation NGOs	3
Mining/Industry	2
State government	1
TOTAL	6

Analysis of submissions

The table below summarises the feedback received and how it was considered in the finalisation of the plan.

Submission Number	Summary of Comment or Key Issue	Criteria	Response	Plan Amended
Online submissions (survey form)				
1, 2, 3	Q1 Cultural and natural values are important.	2a	Noted.	No
1, 2, 3	Q2 How sections 1-6 introduce the planning area - well, extremely well, well.	2a	Noted.	No
1	Q3 Strongly support the proposed joint management body to oversee the implementation of the plan. Strongly support the proposed Ramsar nomination for its international importance ecologically and as a Waterbird habitat. Propose that the timescale for the Ramsar nomination shortened to five years and funds sourced from the mining industry for the ECD.	2a	Noted. Comments support these sections of the plan.	No
2	Q3 Fully supportive of these sections, including the Key Performance Indicators.	2a	Noted. Comment supports these sections of the plan.	No
1, 2, 3	Q4/Q6 (Q5/Q7) How well sections 7 and 8 provide for the conservation of these values - well/well (happy with proposals/well thought out), no opinion/no opinion, well/well.	2a	Noted.	No
1, 2, 3	Q8 (Q9) How well Section 9 provides for the conservation of these values - well (Further research and ongoing monitoring is essential. Weed and feral animal control is essential), extremely well (fully supportive of this section), extremely well.	2a/2c	Noted. The joint plan is intended to provide broad direction. Detailed planning for research, monitoring and weed and feral animal control will occur at operational level.	No
1, 2, 3	Q10 (Q11) How well sections 11 and 12 provide for the conservation of these values - well (all good), extremely well (fully supportive of this section), somewhat well.	2a	Noted. Comments support these sections of the plan.	No
1, 2, 3	Q12 (Q13) How well sections 13, 14 and 15 provide for the management of these issues - well (should be a high priority), extremely well (particularly interested in the sections on weeds and pest animals and their management), somewhat well.	2a	Noted. Comments support these sections of the plan.	No

Submission Number	Summary of Comment or Key Issue	Criteria	Response	Plan Amended
1	<p>Q14, Q15, Q16 Comments on sections 16-17 - visitor access should not be facilitated or encouraged until the conservation and heritage measures are in place. Visitor access should be a low priority as it could bring weeds, feral animals and wildfires into the reserve.</p> <p>Comments on section 18-21 - a contentious area that needs to be carefully monitored and regulated to prevent ecological damage.</p> <p>Comments on section 22-23 - a very important section and should be a high priority. Monitoring and auditing of the plan should be well resourced.</p>	2a/2c	<p>The joint plan is intended to provide broad direction.</p> <p>Visitor access will be investigated during the life of the plan, and as stated under section 16 "visitation to the reserve will be investigated and any proposed visitation to the reserve must be compatible with the reserve's purpose of 'conservation of flora and fauna' and not adversely impact the cultural and natural values of the reserve".</p> <p>Resources and funding will be considered at an operational level, through detailed planning.</p>	No
2	<p>Q14, Q15, Q16 Comments on sections 16-17 - very supportive of this section.</p> <p>Comments on section 18-21 - section 20 to include a mgt strategy similar to the total water abstraction from all proponents should not reduce the cultural and natural values of the Fortescue Marsh.</p> <p>Comments on section 22-23 - the sections are supported.</p>	2a/2b/2c	<p>Water abstraction is beyond the scope of the joint plan. Water abstraction is managed through licencing by DWER or approvals under the <i>Environmental Protection Action 1986</i>. DBCA will work with various agencies to provide advice on the potential impacts of proposals, and to encourage more research and monitoring.</p>	No
1	<p>Q17 Additional information - no</p> <p>Q18 Additional comments - This is a very welcome development and long overdue. I hope the plan can be fully implemented and that the Ramsar nomination goes ahead as soon as possible. This is one of the most important wetlands in WA.</p>	2a	<p>Noted. Comments support the joint plan.</p>	No
2	<p>Q17 Additional information - adequate funding needs to be provided by the State to ensure that the management plan can be effectively implemented.</p> <p>Q18 Additional comments - protection of the natural hydrology to protect cultural values and flora and fauna is crucial.</p>	2a/2c	<p>The joint plan is intended to provide broad direction. Funding will be considered at an operational level. DBCA and KNAC will collaborate with stakeholders to explore funding opportunities.</p>	No

Submission Number	Summary of Comment or Key Issue	Criteria	Response	Plan Amended
3	<p>Q17 Additional information - I would like to see the whole of the Fortescue Marsh wetland included in the plan. That means the east and west sides extended.</p> <p>Q18 Additional comments - I support the proposal to give Ramsar Wetland status to the Fortescue Marsh.</p>	2a/2c	<p>The planning area covers the section of Fortescue Marsh within the Nyiyaparli Determination Area.</p> <p>Proposed additions to the planning area were considered during development of the joint plan. An eastern extension to the Fortescue Marsh Nature Reserve has been proposed, as outlined under section 2., page 3.</p>	No
Hardcopy submissions (letters received via email)				
4	<p>Recommendation for the continuation of the Fortescue Marsh Reference Group, established and defined within the Fortescue Marsh Management Strategy 2018 - 2024. Such a reference group, including representatives of neighbouring interests, provides a mechanism to collaborate, integrate and support management activities in the interests of protecting the values of the reserve and neighbouring tenements.</p>	2c	<p>DBCA and KNAC acknowledge the importance of the reference group. A reference group will be developed, as stated at management strategy 10. "As part of the ongoing management of the Marsh, develop a collaborative advisory group to facilitate management...", page 9.</p>	No
5	<p>The Plan and overarching strategic objectives, are robust and welcome the establishment of the Fortescue Marsh Nature Reserve. Several initiatives in our Biodiversity Strategy that aligns with Plan. This includes supporting additional conservation actions, including working towards continued funding of the Fortescue Marsh Offsets Program (with DBCA and KNAC) and supporting regional weed control programs by the Pilbara Weed Management Committee, and funding taxonomic research into invertebrates with the Western Australia Museum, and flora with the Western Australia Herbarium.</p>	2a	<p>Noted. DBCA and KNAC recognise the importance of working cooperatively with neighbouring land managers/users, as reflected in the mgmt strategies on page 4. DBCA and KNAC also recognise the importance of continuing partnerships and projects with stakeholders and welcome continuing discussions about the Fortescue Marsh Offsets Program and other project opportunities.</p>	No

Submission Number	Summary of Comment or Key Issue	Criteria	Response	Plan Amended
5	Noted absence of groundwater bores on the southern boundary of Fortescue Marsh to allow monitoring of the natural variability of groundwater levels at the Marsh boundary and verification of natural groundwater levels. A suggestion that the installation of several shallow groundwater monitoring bores (or at a minimum, a single shallow bore) on the southern margin of the Fortescue Marsh, would yield invaluable data that could better inform an understanding of longer-term variability and trends related to hydrological regimes and water quality within the Marsh.	2b	Noted. The installation of the bores is outside the scope of the joint plan, however, further discussions on the matter can occur if monitoring in this area is required.	No
6	Incorporate more management strategies identified by the <i>Karlka Nyiyaparli Aboriginal Corporation People and Country Plan Fortescue Marsh 2023-2032</i> . As a joint management plan with KNAC, the draft Management Plan 2024 should reference this document to continue to foster strong relationships and collaboration.	2c	The joint plan references this important document in the Acknowledgements and the Introduction. DBCA and KNAC staff worked closely to prepare a joint plan that complements the People and Country Plan.	No
6	Recommend that the DBCA sets the strategic direction for Water as a key environmental and cultural value in Fortescue Marsh.	2c	Water is addressed under Table 1, and sections 10 and 20. Under section 4. the strategic objectives refer to Nyiyaparli <i>Yurlu</i> (Country), which encompasses both land and water.	No
6	The draft Management Plan 2024 should include performance measures and monitoring for upstream and downstream impacts, cumulative impacts, and episodic flooding.	2b	Monitoring for upstream and downstream impacts, cumulative impacts and episodic flooding is outside of the scope of the management plan. As outlined under section 20., DBCA and KNAC will continue to support monitoring of surface and ground water flow and water quality by key stakeholders.	No

Submission Number	Summary of Comment or Key Issue	Criteria	Response	Plan Amended
	<p>The management strategies for Water or Papa (page 17) need to include Key Performance Indicators, triggers or thresholds for water protection. To achieve good management of water, a collaborative effort between all key stakeholders is required to effect better environmental outcomes. Collaboration between the Weeli Wolli Catchment Industry Collaboration Group (part of Chamber of Minerals and Energy WA), DBCA, the Department of Water and Environmental Regulation, and the EPA is imperative to achieve “conservation, preservation, protection, enhancement and management of the environment” (EP Act).</p>	2b	<p>Key Performance Indicators, triggers or thresholds for water protection are outside of the scope of the joint plan. To progress a nomination of Fortescue Marsh as a Ramsar wetland of international importance, an Ecological Character Description will be prepared. This document will provide the baseline description of the wetland and include information such as a description of the components and processes of the site; limits of acceptable change; knowledge gaps; key monitoring needs. DBCA and KNAC will continue to work cooperatively with key stakeholders on various projects. Key stakeholders will have the opportunity to join the collaborative advisory group (management 10, page 9).</p>	No
6	<p>Support for the addition of the proposed Eastern Extension area. However, the advice of the EPA to the Minister for Environment under Section 16(e) of the EP Act: FMMA [Fortescue Marsh Management Area] [EPA 2013] identifies six zones according to their environmental significance. Zones Northern Flank (1a) and Marsh (1b) are afforded the highest significance and would benefit from the highest conservation status and management. The current planning area only covers 1a and some of Calcrete Flats (2a).[it is noted the] challenges with securing land for reserve systems, particularly for class A, but given the high significance of the area, exploring additional tenure options and working arrangements with industry will get improved outcomes. This will better maintain the hydrological function of the area, protect the natural springs and pools, and manage groundwater drawdown to reduce impacts on riparian vegetation in the Northern zones of the Fortescue Marsh.</p>	2a/2b/ 2c	<p>Noted. This information was considered when identifying proposed additions to the planning area - discussions occurred prior to and during the development of the joint plan.</p>	No

Submission Number	Summary of Comment or Key Issue	Criteria	Response	Plan Amended
6	There is considerable need for the application of cumulative impact assessment [CIA] in the Fortescue Marsh region given the high level of development in the region and associated impacts on significant flora, fauna and hydrological function of the catchment area. The data collected in the management objective for Research (page 42) will support quantitative CIA. It is recommended to contribute to publicly available data (attributed/non-attributed) and the WA Biodiversity Science Institute's (WABSI) Shared Environmental Analytics Facility (SEAF) project. DBCA is commended for its management strategies as this will effectively inform outcomes-based conditions.	1a/2c	Noted. DBCA and KNAC recognise the importance of sharing data and this is addressed under section 23, pages 41-42. The joint plan amended to include the SEAF project.	Yes
6	Based on the values, objectives and strategies in the FMMA, it is recommended targeted, holistic and interconnected research of the fauna and habitats of: Northern Quoll (<i>Dasyurus hallucatus</i>), aquatic invertebrates, subterranean fauna, Bilby (<i>Macrotis lagotis</i>), Night Parrot (<i>Pezoporus occidentalis</i>). Research targeted on qualitative analysis of the current approaches and addressing knowledge gaps for species of high conservation status will enhance the EIA process and affect better environmental protection.	2c	The joint plan outlines the importance of collaborative research and the sharing of research findings, which is addressed under section 23, page 41. This section also lists some of the gaps in knowledge related to the nature reserve, including more surveys for culturally important and conservation significant fauna. Detailed planning for research will occur at operational level.	No
6	The EPA is soon to release a modernised version of GS6 Rehabilitation of Terrestrial Ecosystems (2006). The newly updated Guideline will provide proponents and other interested parties with contemporary information to progressively restore disturbed areas within Fortescue Marsh.	1a	Noted. This information will be passed on for consideration at operational level.	No
	Recommend a further research opportunity from the FMMA, into Samphire vegetation communities and Freshwater claypans of the Fortescue Valley. This compliments the acknowledgement of these areas as Priority Ecological Communities for WA (2023).	2c	Noted. A comprehensive floristic survey of the Marsh, with a focus on the samphire vegetation of the Marsh Land System, was completed by Markey (2017) (page 18). Detailed planning for additional survey work and research will occur at operational level.	No

Submission Number	Summary of Comment or Key Issue	Criteria	Response	Plan Amended
6	The draft Management Plan 2024 currently references the Pilbara Environmental Offsets Fund (PEOF) (in 'Section 18. Mineral exploration and development: Christmas Creek iron ore mine', page 35). Following the recent evaluation of the PEOF, the Department of Water and Environmental Regulation (DWER) is coordinating policy and program design reform. The EPA encourages DBCA to actively engage in this reform to ensure PEOF effectively contributes to positive outcomes for Fortescue Marsh and surrounding regions.	2a/2b	Noted. DBCA welcomes the opportunity to engage in the proposed policy and program design reform.	No
6	Section 18 Management objectives (page 36) also reference the mitigation hierarchy, which is essential to the EIA process the EPA undertakes. The preference for environmental protection is to avoid adverse environmental impact altogether, followed by minimising the magnitude of an adverse impacts. The offsetting of impacts through mechanisms such as the PEOF is an option of last resort that should only be applied where significant environmental impacts cannot be mitigated using strategies further up the hierarchy. The EPA will be looking to DBCA for advice on what is needed to counterbalance significant impacts and recommendations on what offset strategies will work best.	2a/2b	Noted. DBCA welcomes the opportunity to provide advice on these matters.	No
6	Recommends that a link to the EPA Public Advice: Considering environmental offsets at a regional scale be included in the draft Management Plan 2024, as this document aligns with the management objective to 'minimise the impact of mineral exploration and development on the reserve's key values'. https://www.epa.wa.gov.au/sites/default/files/Policies_and_Guidance/Public%20Advice%20Considering%20Environmental%20Offsets%20at%20a%20Regional%20Scale.pdf	2b	Noted. Consideration of offsets is beyond the scope of the joint plan. DBCA will work with various agencies "to provide advice on the potential impacts of development proposals on the reserve's key values and overall integrity of the planning area, and to provide advice on avoidance, minimisation and mitigation measures.", mgmt strategy 1. page 36	No

Submission Number	Summary of Comment or Key Issue	Criteria	Response	Plan Amended
6	As a wetland of National Importance, the EPA would like DBCA to consider revising Section 14 'Weed and pest animals' (pages 26-30) to better emphasise the need to prepare for and respond to emerging biosecurity risks, to support prevention and or eradication of biosecurity pests before they become established in the region. For example, Western Australia is taking a whole of Government approach to future proofing against the emerging avian Influenza threat as well as the potential for large-scale cane toad (<i>Rhinella marina</i>) incursions. As a wetland of National Importance, the waterbirds and migratory birds of Fortescue Marsh are at high risk of disease and other threatening processes.	1d	Section 14. reviewed and amended. New mgmt strategy "Work with other agencies and stakeholders (e.g. DPIRD, Biosecurity groups) to detect and respond to emerging biosecurity risks.'	Yes
6	The EPA is of the view that buffers are an important mechanism for protecting the environmental values of all wetlands including the Fortescue Marsh, as they can minimise the risks of impacts from nearby land uses. The FMMA defines buffers around Zones 1a, 2a, 2b and 3a to allow for edge effects. In these high priority areas buffers should be set to account for surface and groundwater catchment areas, vegetation and fauna habitat, and to support ecological and hydrological integrity. The EPA encourages the DBCA to maintain and protect ecological buffers as a management strategy under the 'To protect and conserve hydrological values and processes' (page 17) objective within the draft Management Plan 2024.	2b	The joint plan will guide the management of Fortescue Marsh Nature Reserve, and KNAC and DBCA will jointly manage the reserve. Any areas (buffers) outside of reserve are responsibility of the landowner/manager/users. DBCA and KNAC will work cooperatively with neighbouring land managers/users so that a whole-of-landscape management approach is considered and implemented where practicable.	No

Appendix: Online survey questions



Fortescue Marsh Nature Reserve draft joint management plan 2024 - Have your say

The Conservation and Parks Commission, Department of Biodiversity, Conservation and Attractions and Karla Nyiyaparli Aboriginal Corporation RNTBC invite you to comment on the:
Fortescue Marsh Nature Reserve (Nyiyaparli Country) draft joint management plan 2024

If you haven't already done so, please visit dbrca.wa.gov.au/haveyoursay to view a copy of the draft joint management plan (the plan) and the map of the planning area.

This plan has been prepared jointly with Karla Nyiyaparli Aboriginal Corporation RNTBC and it contains proposed management strategies for protecting the reserve's important cultural and natural values.

Please use this online form to have your say on these management strategies for the Fortescue Marsh Nature Reserve (Nyiyaparli Country). Your name and contact details will be asked for at the end of your submission. Anonymous submissions will not be accepted.

The public submission period closes on 21 February 2025 and this form will close at 5pm.

Thank you.

nyiyaparli

Your comments on *Introduction and Looking after Yurlu* (Management direction and context)

These sections (1-6) introduce the planning area that lies within Nyiyaparli Yurlu (Country), list key values and management issues, explains joint management and outlines broad strategic directions for the management of the reserve.

1. What values of the Fortescue Marsh Nature Reserve (Nyiyaparli Country) are important to you? You may choose more than one answer. *

- ☐ Cultural values (e.g. Aboriginal cultural heritage, other heritage)
- ☐ Natural values (e.g. geology, landforms, water, plants, animals, habitats)
- ☐ None

2. How well do you think sections 1-6 introduce the planning area, the key values and management issues and outline the management direction and context? *

- ☐ Extremely well
- ☐ Well
- ☐ Somewhat well
- ☐ Poorly
- ☐ No opinion

3. Please comment, including what you support and/or what would improve these sections:

Your comments on *Connection to Yurlu (cultural values)*

Section 7 of the plan describes proposed management for Nyiyaparli cultural heritage including a description of Nyiyaparli People's connection to Yurlu (Country), the plants, animals and sites of significance, cultural significance of water, traditional knowledge and customary activities.

Section 8 of the plan describes proposed management for other heritage including the old infrastructure associated with pastoralism.

Management objectives and strategies have been developed for each set of values.

4. How well do you think Section 7 Nyiyaparli cultural heritage provides for the conservation of these values?

★

- ☐ Extremely well
- ☐ Well
- ☐ Somewhat well
- ☐ Poorly
- ☐ No opinion

5. Please comment, including what you support and/or what would improve this section:

6. How well do you think Section 8 Other heritage provides for the conservation of these values?

★

- ☐ Extremely well
- ☐ Well
- ☐ Somewhat well
- ☐ Poorly
- ☐ No opinion

7. Please comment, including what you support and/or what would improve this section:

Your comments on *Caring for Yurlu (natural values)*

Sections 9 – 15 of the plan describe proposed management of natural values and associated pressures and threats (geology, landforms and soils; hydrology (water); native plants and vegetation communities; fire, native animals and habitats; weeds and pest animals; climate change).

8. **How well do you think sections 9 *Geology, landforms and soils* and 10 *Papa (water)* provides for the conservation of these values?** *

- ☐ Extremely well
- ☐ Well
- ☐ Somewhat well
- ☐ Poorly
- ☐ No opinion

9. **Please comment, including what you support and/or what would improve these sections:**

10. **How well do you think sections 11 *Native plants and vegetation communities* and 12 *Native animals and habitats* provides for the conservation of these values?** *

- ☐ Extremely well
- ☐ Well
- ☐ Somewhat well
- ☐ Poorly
- ☐ No opinion

11. **Please comment, including what you support and/or what would improve these sections:**

12. **How well do you think sections 13 *Right-way fire*, 14 *Weeds and pest animals* and 15 *Climate change* provides for the management of these issues?** *

- ☐ Extremely well
- ☐ Well
- ☐ Somewhat well
- ☐ Poorly
- ☐ No opinion

13. **Please comment, including what you support and/or what would improve these sections:**

Your comments on *People on Yurlu (community values)*

Sections 16 – 17 of the plan describes visitor planning and access for the planning area.

14. Please comment, including what you support and/or what would improve these sections:

Your comments on *Using resources from Yurlu (sustainable economic and resource use)*

Sections 18 – 21 of the plan describes proposed management of economic and resource use.

15. Please comment, including what you support and/or what would improve these sections:

Your comments on *Understanding Yurlu (evaluation, monitoring and research)*

Sections 22 – 23 of the plan describes proposed direction for performance monitoring and evaluation that will help with management effectiveness, and research in the planning area.

16. Please comment, including what you support and/or what would improve these sections:

Anything to add?

17. Do you have any additional information relevant to the management of the planning area that you think may not have been considered in the development of the plan?

18. Do you have any additional comments you would like to make?