



**PLAN FOR OUR PARKS**

SECURING 5 MILLION HECTARES OVER 5 YEARS



# Analysis of public submissions **Badimia parks and reserves**

draft joint management plan 2024



Department of **Biodiversity,  
Conservation and Attractions**



**Badimia Bandi Barna**  
Aboriginal Corporation (ICN 8765)

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This document is available in alternative formats on request.

### **Front cover photos**

Main: Mongers Lake. Photo - *Beverley Slater*

Top left: Worked stone artefact. Photo – *Kirrily Hastings*

Top right: Gurdurdu Conservation Park. Photo – *Adrian Pinder/DBCA*

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# Public consultation process

The Badimia Parks and Reserves Draft Joint Management Plan was released for public consultation on 6 September 2024 for a 9-week public comment period, which closed on 8 November 2024.

Public consultation was promoted by:

- Joint media statement from Badimia Bandi Barna Aboriginal Corporation, the Conservation and Parks Commission and the Department of Biodiversity Conservation and Attractions on 6 September 2024.
- Notice in the *Government Gazette* on 13 September 2024.
- Advertising in *The West Australian* on 14 September 2024, and again on 12 October 2024.
- Advertising in the *Midwest Times* on 18 September 2024, and again on 16 October 2024.
- Publishing the plan and supporting material on the DBCA website.
- Making hardcopies of the plan available at the DBCA Head Office in Kensington.
- Notifying more than 80 key stakeholders and government agencies.
- Providing electronic copies of the plan to State, National and Parliamentary libraries.
- Social media posts on the Parks and Wildlife Service Facebook on 6 September 2024.

Submissions on the Badimia parks and reserves draft joint management plan could be made by:

- Completing the online survey at [dbca.wa.gov.au/haveyoursay](https://dbca.wa.gov.au/haveyoursay).
- Writing to the:

Planning Unit, Aboriginal Engagement, Planning and Lands Branch

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 valid submissions received were assessed against the following criteria.

1. Comments or key issues meeting criteria 1A – 1E resulted in an amendment to the plan:

- 1A Provided additional information of direct relevance to management.
- 1B Provided additional information on affected user groups of direct relevance to management.

- 1C Indicated a change in (or clarified) legislation or government policy.
- 1D Proposed an alternative approach that would better achieve the objectives for the planning area than that proposed.
- 1E Indicated omissions, inaccuracies, or a lack of clarity.

2. Comments or key issues meeting criteria 2A – 2G did not result in an amendment to the plan:

- 2A Clearly supported the plan.
- 2B Made general, open or neutral statements or no change was sought.
- 2C Addressed issues beyond the scope of the plan, or recommended the inclusion of detailed or prescriptive information that is not appropriate for a plan of this type.
- 2D Referred to issues that are already addressed in the plan or already considered during its preparation.
- 2E Proposed an alternative approach, but the approach in the plan is still considered the best option.
- 2F Suggested options that are not feasible (generally due to conflict with legislation, government or department policy, lack of resource capacity, or lack of knowledge to support decision-making).
- 2G Based on unclear or factually incorrect information or information that was unable to be validated.

No weighting was given to any submission based on its source or origin or any other factor that would elevate the importance of any submission above another.

## Overview of submissions

A total of 12 unique submissions were received.

Submissions were received from:

- individuals,
- private (non-government) conservation sector,
- community-based organisations,
- recreational interest,
- tourism,
- industry groups and businesses, and
- government sectors.

Refer to Table 1 for a summary of submissions.

*Table 1: Source and number of unique submissions*

| Source                                   | Number    |
|------------------------------------------|-----------|
| Individuals                              | 2         |
| Community-based organisations            | 1         |
| Conservation NGOs                        | 1         |
| Recreational clubs or organisations      | 1         |
| Industry, industry groups and businesses | 5         |
| State government                         | 2         |
| <b>TOTAL</b>                             | <b>12</b> |

A summary of the origin of submitters is provided in Table 2.

*Table 2: Origin of submissions*

| Origin                                        | Online survey | Emails and letters | Total     |
|-----------------------------------------------|---------------|--------------------|-----------|
| Regional - Meekatharra                        |               | 1                  | 1         |
| Regional - Mukinbudin                         | 1             |                    | 1         |
| Unknown but identified as regional location   | 5             | 1                  | 6         |
| <b>Total</b>                                  | <b>6</b>      | <b>2</b>           | <b>8</b>  |
| Western Australia – Perth Metropolitan Region | 4             |                    | 4         |
| <b>TOTAL</b>                                  | <b>10</b>     | <b>2</b>           | <b>12</b> |

## 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 |
|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| General                         |                                                                                                                                                                                                                                                                                                                                                                          |          |                                                                                                                                                                                                   |              |
| 1                               | Supportive of the Badimia Parks and Reserves Draft Joint Management Plan (DJMP).                                                                                                                                                                                                                                                                                         | 2a       | Noted                                                                                                                                                                                             | No           |
| 2                               | Support for a plan that provides for joint management with Badimia people.                                                                                                                                                                                                                                                                                               | 2a       | Noted                                                                                                                                                                                             | No           |
| 3                               | Supportive of DJMP because it acknowledges the traditional ownership of these lands by the Badimia people as well as the historical implications of the management of these lands since European settlement.                                                                                                                                                             | 2a       | Noted                                                                                                                                                                                             | No           |
| 5                               | It is pleasing to see the strong collaboration with Badimia People in the development of this Plan. The detailed use of language is a highlight of this document and the outlined Vision is admirable.                                                                                                                                                                   | 2a       | Noted                                                                                                                                                                                             | No           |
| 5                               | There are opportunities to improve the transparency and commitment from DBCA in this Plan. The mechanism to fund engagement by BBBAC or the implementation of this plan is not evident, and while it may be covered in other documents such as the Joint Management Agreement (pg9), identification or reference to the funding source should be stated more explicitly. | 2c       | Funding arrangements are covered in the joint management agreement, implementation plans & associated documents.                                                                                  | No           |
| 5                               | Submitter supportive of the array of quality images depicting Badimia country, but suggests that the intent of the plan (about joint management and the Badimia people on country) would be better reinforced by including images with people in them.                                                                                                                   | 2e       | Photos will be unchanged as per Badimia Traditional Owner preferences                                                                                                                             | No           |
| Welcome to Barna (Introduction) |                                                                                                                                                                                                                                                                                                                                                                          |          |                                                                                                                                                                                                   |              |
| 5                               | There are too few suitable KPIs in the plan to cover priority areas on Page 13.                                                                                                                                                                                                                                                                                          | 2f       | KPIs have been applied where relevant in the plan and have been developed in accordance with agreed parameters.                                                                                   | No           |
| 5                               | The plan would be strengthened by increased reference to and alignment with KPIs in the Badimia Barna Healthy Country Plan.                                                                                                                                                                                                                                              | 1d       | The plan has been amended to increase reference to targets, goals and strategies in the Badimia Barna Healthy Country Plan. The Badimia Barna Healthy Country Plan does not specify 'indicators'. | Yes          |

| Submission Number                            | Summary of Comment or Key Issue                                                                                                                                                                                                                                                                                                                       | Criteria | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Plan Amended |
|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| 5                                            | No KPI has been established for Badimia employment, although applicable to many sections this may be best addressed in the Badimia Landscape section (pg31).                                                                                                                                                                                          | 2e       | Detailed information about Badimia employment including employment funding is found in other DBCA-BBBAC joint management documents.                                                                                                                                                                                                                                                                                                                          | No           |
| 5                                            | Key Values (pg9) have become confused with the dot points for 'Visitor use'. These represent opportunities/aspirations for DBCA and do not appear aligned to values held by Traditional Owners or the Badimia Barna Healthy Country Plan.                                                                                                             | 1e       | The purpose of national parks and conservation parks includes public recreation, and visitor use has been correctly identified among the key values. The parks are jointly vested and jointly managed with BBBAC, and the management plan has been jointly developed with BBBAC (so reflects shared aspirations/opportunities for these areas). The heading in this section has been changed from 'Visitor Use' to 'Recreational Values' to improve clarity. | Yes          |
| Looking after Country (he Badimia landscape) |                                                                                                                                                                                                                                                                                                                                                       |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                              |              |
| 6                                            | Submission details additional information and reference materials to assist with management of the Badimia parks and reserves (e.g. DPIRD land system mapping, assessments of the impacts of pastoralism, baseline occurrence and condition data on soils, landforms, vegetation, habitat, ecosystems, and declared plants and animals, GIS datasets) | 2c       | Submitter provides noteworthy information. No changes needed to plan however this detailed information can be considered as part of plan implementation.                                                                                                                                                                                                                                                                                                     | No           |
| 6                                            | Submission provides details of research in progress relevant to ecosystems in the Badimia parks and reserves - i.e. state and transition models for mulga rangelands of the Gascoyne & Murchison to simulate future states and develop indicators for restoration.                                                                                    | 2c       | Noted. No changes to plan needed, but the research outcomes can be considered once available and as the Badimia parks and reserves joint management plan is implemented.                                                                                                                                                                                                                                                                                     | No           |
| 6                                            | Submission provides details of information on useful experiences and lessons on rehabilitation and landscape rehydration in the local area.                                                                                                                                                                                                           | 2c       | Submitter provides noteworthy information. No changes needed to plan, however this detailed information can be considered as the Badimia parks and reserves joint management plan is implemented.                                                                                                                                                                                                                                                            | No           |
| Looking after Country (flora & fauna)        |                                                                                                                                                                                                                                                                                                                                                       |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                              |              |
| 2                                            | The KPIs for flora and fauna should not only focus on diversity, but should include metrics or abundance and population trends.                                                                                                                                                                                                                       | 2g       | The specific metrics that will be measured to assess KPIs will be developed during plan implementation.                                                                                                                                                                                                                                                                                                                                                      | No           |

| Submission Number                          | Summary of Comment or Key Issue                                                                                                                                                                                                                                                                                                                                                                           | Criteria | Response                                                                                                                                                                                                                                                                                                           | Plan Amended |
|--------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| 2                                          | The plan refers to conducting surveys of 3 species (the meelyu, wabarl and Lake Goorly shield-backed trapdoor spider) - it would be better if there were management strategies to monitor all taxa/guilds to improve conservation outcomes more broadly.                                                                                                                                                  | 2d, 2g   | The plan already provides for the submitters suggested approach.                                                                                                                                                                                                                                                   | No           |
| 2                                          | There are several management strategies on page 40 that do not have corresponding KPIs on page 41.                                                                                                                                                                                                                                                                                                        | 2f       | KPIs have been applied where relevant in the plan and have been developed in accordance with agreed parameters.                                                                                                                                                                                                    | No           |
| 2                                          | The KPI for biological survey of the Badimia parks should have targets for ongoing/future surveys as well as the initial baseline surveys.                                                                                                                                                                                                                                                                | 2d, 2g   | The plan already provides for the submitters suggested approach.                                                                                                                                                                                                                                                   | No           |
| 2                                          | Management strategy 3a on page 40 could be expanded to monitor threats to these species more broadly as well as 'monitoring visitor impacts'. It should also have a corresponding KPI.                                                                                                                                                                                                                    | 2d, 2f   | Strategy 3 already refers to threats to these species more broadly. KPIs have been applied where relevant in the plan and have been developed in accordance with agreed parameters.                                                                                                                                | No           |
| Looking after Country (introduced species) |                                                                                                                                                                                                                                                                                                                                                                                                           |          |                                                                                                                                                                                                                                                                                                                    |              |
| 2                                          | The list of required data on page 13 and the KPIs on page 44 should refer to 'control of predators' introduced predators have played a significant part in the extinction of many native species and it is therefore important to monitor and control introduced predators in the Badimia parks and reserves. Submitter describes/suggests a KPI that should be included on the topic of feral predators. | 2f       | Suggested KPIs have not been included as the KPIs were developed in accordance with agreed parameters. Changes have however been made to strategies to reflect resource & other constraints dictate that introduced species management will focus on priority species, which may change over the life of the plan. | No           |
| 2                                          | Fully endorse collaborating with neighbouring areas managed for conservation (Mt Gibson Sanctuary, Biluny Wells NR, Charles Darwin Reserve, Gurdurdu CP and Ninghan IPA) on feral predator control efforts (p42)                                                                                                                                                                                          | 2a       | Noted                                                                                                                                                                                                                                                                                                              | No           |
| 2                                          | Submitter provides information from the WA Department of Agriculture and Food which says risks to native animals and humans associated with 1080 baiting are very low/minor.                                                                                                                                                                                                                              | 2d       | Consideration of acceptable risks was taken into account during preparation of the DJMP.                                                                                                                                                                                                                           | No           |
| 2                                          | The target for feral herbivores should be for numbers to decline rather than 'not increase'/remain stable                                                                                                                                                                                                                                                                                                 | 2e       | Some key feral herbivores are not present at all, so suggested change to KPI not accurate.                                                                                                                                                                                                                         | No           |
| 2                                          | The KPI that refers to weed mapping should also include reference to weed control or management - to address the key risk of weeds establishing and/or further spreading.                                                                                                                                                                                                                                 | 1d       | Some changes made to this KPI in light of submitter's suggestion                                                                                                                                                                                                                                                   | Yes          |
| Looking after Country - wadyan (fire)      |                                                                                                                                                                                                                                                                                                                                                                                                           |          |                                                                                                                                                                                                                                                                                                                    |              |

| Submission Number                          | Summary of Comment or Key Issue                                                                                                                                                                                                                                                | Criteria | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Plan Amended |
|--------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| 2                                          | The plan should also refer to collaboration with neighbouring landowners and local stakeholders on Wadyan management. Local stakeholders should work together to achieve better co-ordinated, more efficient fire management, and to encourage knowledge sharing in this area. | 1b       | Plan amended                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Yes          |
| 5                                          | The management objectives for Fire-Wadyan are appropriate, but there should also be corresponding KPIs given it is an environmentally and culturally important tool (e.g. as expressed on Page 46).                                                                            | 2f       | KPIs have been applied where relevant in the plan and have been developed in accordance with agreed parameters.                                                                                                                                                                                                                                                                                                                                                         | No           |
| People on Country (Tourism and Recreation) |                                                                                                                                                                                                                                                                                |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |              |
| 1                                          | Domestic dogs should be allowed in camping areas as there would be limited impact provided they are kept leashed.                                                                                                                                                              | 2d, 2f   | Option not possible due to conflict with departmental policy, and potential risks associated with baits used for feral predator control.                                                                                                                                                                                                                                                                                                                                | No           |
| 1                                          | Consider specific public hunting areas, allowing targeting of damaging pests by hunting sport enthusiasts.                                                                                                                                                                     | 2f       | Recreational hunting is not permitted in conservation estate. Certain recognised recreational hunting groups with which the Department has formal Memorandum of Understanding (MoU), may, only on specific occasions & under specific formal arrangements and permits, be involved in pest animal control. Individuals are only eligible to participate in these specific events if they are members of the relevant formally recognised MoU recreational hunting group | No           |
| 2                                          | An additional potentially valuable exception to allow dogs onto your properties is for conservation dogs - e.g. dogs that can be trained to detect specific animals, plants or diseases.                                                                                       | 1a       | Text amended                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Yes          |
| 7                                          | Main Roads intends to maintain management of the White Wells rest area adjacent to Biluny Wells nature reserve and have the right to upgrade, modify and close the rest area.                                                                                                  | 2b       | Noted. No amendment proposed.                                                                                                                                                                                                                                                                                                                                                                                                                                           | No           |
| 3                                          | There are many community members who enjoy camping and allowing this and tourism more generally to occur will allow non-Aboriginal people to gain an understanding of Badimia country, culture and values.                                                                     | 2a       | Noted                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | No - N/A     |

| Submission Number                  | Summary of Comment or Key Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Criteria | Response                                                                                                                                                                                                                                                                                                                                                   | Plan Amended |
|------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| 4                                  | Our club, which is affiliated with a national body representing horse riders around Australia (ATHRA), is keen to experience the beauty of the Badimia parks and reserves by horseback, both day rides and as part of longer multi day ones where we camp out. Submitter outlines a range of reasons this activity by this group could be considered appropriate for the Badimia parks and reserves (e.g. public liability insurance and other advantages of ATHRA membership, ATHRA previous work with the Department on drafting guidelines for establishing & maintaining horse trails, horses have been part of the previous use/heritage of the Badimia parks and reserves, use of already existing tracks as horse trails). Our club would welcome an opportunity to work with the Badimia Joint Management Body to establish horse trail rides using existing tracks in the Badimia parks and reserves. | 2d       | No changes needed as the plan already states that horse-riding related recreational opportunities could potentially be considered over the life of the plan (subject to detailed assessments).                                                                                                                                                             | No           |
| 5                                  | Page 56 indicates that visitation is desired, there should be clarification that this is a desire by DBCA, rather than being communicated as a value to Badimia People.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2g       | The parks are jointly vested and jointly managed with BBBAC, and the management plan has been jointly developed with and approved by BBBAC, so is reflecting shared aspirations & opportunities for these areas. The Badimia Barna Healthy Country Plan similarly is supportive of appropriately managed cultural tourism and nature-based or eco-tourism. | No           |
| 5                                  | The plan should specify the mechanism to measure the KPI on Page 56 about Badimia satisfaction for management of cultural heritage sites.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 2f       | This will be a matter for consideration by the JMB.                                                                                                                                                                                                                                                                                                        | No           |
| 5                                  | The KPI about Badimia satisfaction for management of cultural heritage sites at the top of Page 56, could also be applied as a KPI for the Commercial Operators section (Bottom of Page 56).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 2e       | KPIs have been applied where relevant in the plan and have been developed in accordance with agreed parameters.                                                                                                                                                                                                                                            | No           |
| 5                                  | There should be a KPI to go with the management strategy 2 in the Community involvement and collaboration section - this would foster the desired levels of collaboration.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2e       | KPIs have been applied where relevant in the plan and have been developed in accordance with agreed parameters.                                                                                                                                                                                                                                            | No           |
| 5                                  | The Community involvement and collaboration section could include specific mention of the local NRM groups given they are strong supporters of regional conservation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 1b       | Plan amended                                                                                                                                                                                                                                                                                                                                               | Yes          |
| Using Barna (Resources on Country) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |          |                                                                                                                                                                                                                                                                                                                                                            |              |

| Submission Number                              | Summary of Comment or Key Issue                                                                                                                                                                                                                     | Criteria | Response                                                                                                                                                                                                                                                                     | Plan Amended |
|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| 2                                              | Recommend thorough weed hygiene protocols are mandated for any mineral exploration equipment brought onto site.                                                                                                                                     | 2c       | Already broadly addressed in plan strategies. More specific and tailored details on things such as hygiene protocols are routinely communicated on a case-by-case basis to avoid and mitigate impacts of mining operations on conservation estate values.                    | No           |
| 2                                              | To mitigate feral animal incursions, mineral exploration related habitat disturbance and track construction should be kept to a minimum, and tracks should be promptly rehabilitated and blocked as soon as exploration works are completed.        | 2c       | Already broadly addressed in plan strategies. More specific and tailored details on things such as access management and rehabilitation are routinely communicated on a case-by-case basis to avoid and mitigate impacts of mining operations on conservation estate values. | No           |
| 2                                              | To protect meelyu habitat (western spiny tailed skink) we recommend requesting that any exploration or prospecting operation avoid disturbing large fallen trees or debris, as well as live trees larger than 30cm Diameter at Breast Height (DBH). | 1d       | Specific reference to protection of potential habitat trees (live or fallen) included among strategies on page 40. This will be relevant to multiple aspects of park management.                                                                                             | Yes          |
| 10                                             | Submitter who holds a number of mining tenements in the plan area supports the draft joint management plan proposals and wish to work closely with the joint management partners when carrying out activities in their tenement area.               | 2a, 2b   | Noted                                                                                                                                                                                                                                                                        | No           |
| 5                                              | Use of flora and fauna, or of Traditional Knowledge, or of Water Resources (Pages 58- 59) should also have KPIs as these are areas of critical importance to Traditional Owners.                                                                    | 1a       | While KPIs have not been changed, some changes made in light of suggestion that these sections needed to refer to Badimia Barna healthy country values and associated objectives (which also correspond with values and objectives of this management plan).                 | Yes          |
| 5                                              | The use of flora and fauna, and water resources, are areas of critical importance to Traditional Owners- these sections should also heavily reference the Badimia Barna Healthy Country Plan.                                                       | 1d       | Some changes made in light of suggestion that these sections needed to refer to Badimia Barna healthy country values and associated objectives (which also correspond with values and objectives of this management plan).                                                   | Yes          |
| 5                                              | Water resources management strategy 2 is ambiguous - 'management purposes' should be expanded upon.                                                                                                                                                 | 1a       | Text amended                                                                                                                                                                                                                                                                 | Yes          |
| Pastoralism - Ngubaanu (Dingoes and wild dogs) |                                                                                                                                                                                                                                                     |          |                                                                                                                                                                                                                                                                              |              |
| 1                                              | End the use of 1080 baits which kill native wildlife such as Dingoes.                                                                                                                                                                               | 2c       | No amendment                                                                                                                                                                                                                                                                 | No           |

| Submission Number | Summary of Comment or Key Issue                                                                                                                                                                                                                                                                                                                                                    | Criteria | Response                                                                                                                                                                                                                                                                                                                                                                                          | Plan Amended |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| 1                 | Native Dingoes are an important apex predator and natural predator to feral cats so the Department shouldn't be killing Dingoes.                                                                                                                                                                                                                                                   | 2d       | The draft plan acknowledged that dingoes are a recognised as a native species under the <i>Biodiversity Conservation Act 2016</i> , while also being included in the definition of 'wild dogs' and declared pests under the <i>Biosecurity and Agricultural Management Act 2007</i> . Landholders, landowners and occupiers have responsibility for controlling declared pests on their own land. | No           |
| 2                 | Controlling ngubaanu does not seem to align with either the conservation or cultural values of the Badimia parks and reserves joint management plan.                                                                                                                                                                                                                               | 2d, 2f   | The draft plan acknowledged that dingoes are a recognised as a native species under the <i>Biodiversity Conservation Act 2016</i> , while also being included in the definition of 'wild dogs' and declared pests under the <i>Biosecurity and Agricultural Management Act 2007</i> . Landholders, landowners and occupiers have responsibility for controlling declared pests on their own land. | No           |
| 2                 | DPIRD are preparing to implement a new Wild Dog Action Plan (WDAP#3) which is moving away from focusing on 'wild dog' control. Significantly the new action plan will not require landholders to control ngubaanu on their property, so this should allow you to avoid killing culturally and ecologically significant animals. Submitter provided relevant DPIRD contact details. | 2b       | Noted. DBCA is working closely with DPIRD as it develops the new Wild Dog Action Plan.                                                                                                                                                                                                                                                                                                            | No           |
| 8; 9              | Submitter calls into question studies that suggest that dingoes may suppress fox and cat populations.                                                                                                                                                                                                                                                                              | 1e       | Statements in plan deleted acknowledging science on this matter may be still evolving & not fully resolved.                                                                                                                                                                                                                                                                                       | Yes          |
| 9                 | Submitter provides a reference to support their claim that wild dog control does not significantly increase feral cat populations.                                                                                                                                                                                                                                                 | 1e       | Statements in plan deleted acknowledging science on this matter may be still evolving & not fully resolved.                                                                                                                                                                                                                                                                                       | Yes          |
| 8                 | Submitter puts forward that studies conducted 'next door to Badimia country' demonstrate that feral cat densities were higher than the national average while dingo density was also very high.                                                                                                                                                                                    | 1e       | Relevant statements deleted acknowledging science on this matter may be still evolving & not fully resolved.                                                                                                                                                                                                                                                                                      | Yes          |
| 8; 11             | Mesopredator release only occurs at a fine scale and does not suppress predators at a landscape scale                                                                                                                                                                                                                                                                              | 1e       | Relevant statements deleted acknowledging science on this matter may be still evolving & not fully resolved.                                                                                                                                                                                                                                                                                      | Yes          |

| Submission Number | Summary of Comment or Key Issue                                                                                                                                                                                                                                                                                                                     | Criteria | Response                                                                                                     | Plan Amended |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|--------------------------------------------------------------------------------------------------------------|--------------|
| 8; 9; 11          | Feral cats remain a major threat to small native animals and require targeted management independent/regardless of wild dog presence.                                                                                                                                                                                                               | 1e       | Text amendments made to improve clarity.                                                                     | Yes          |
| 8                 | DNA analysis from Badimia country demonstrate that despite lethal control for more than 11 years no measure of dingo purity has changed - submission included a source/reference for this claim and that wild dog control measures do not pose an existential threat to these animals.                                                              | 2c       | The plan does not include any statements about whether wild dog control measures have affected dingo purity. | No           |
| 8; 9              | Dingoes regardless of their genetic makeup/purity (along with feral dogs, free roaming dogs and their hybrids) are defined as wild dogs under the Western Australian <i>Biosecurity and Agriculture Management Act 2007</i> - all are declared pests under the Act and must be managed to protect agricultural operations and environmental values. | 2d       | Already addressed in draft plan.                                                                             | No           |
| 8; 9              | The Badimia Parks and reserves should be baited using 1080 ground and aerial baiting as part of 'nil tenure' landscape scale programs in the region.                                                                                                                                                                                                | 2c, 2d   | The draft plan included strategies about wild dog control in the Badimia parks and reserves.                 | No           |
| 8; 9              | The use of 1080 does not pose undue risk to people or other species. Submitter references a draft paper to support this comment (Kreplin, Agar - not provided with submission)                                                                                                                                                                      | 2d       | Acceptable risk was considered during preparation of the draft joint management plan.                        | No           |
| 8; 9              | Submitter explains what 1080 is and why it has been and is used as the best option for invasive species control                                                                                                                                                                                                                                     | 2c       | No amendment proposed.                                                                                       | No           |
| 8; 9              | Submitter claims that there have not been reported human deaths from 1080 poisoning in Australia, and that a person would need to eat very large quantities of poisoned meat in a single meal to be themselves poisoned.                                                                                                                            | 2d       | Acceptable risk was considered during preparation of the draft joint management plan.                        | No           |
| 8                 | Secondary poisoning from baiting practices is a myth as evidenced by the continued safety of Aboriginal communities hunting native animals like goannas, which have ingested 1080 naturally from plants for generations.                                                                                                                            | 2d       | Acceptable risk was considered during preparation of the draft joint management plan.                        | No           |
| 9                 | There is an average of 400 wild dogs taken from our biosecurity group region per year. Our records show that this number is maintained year after year and demonstrates that wild dog populations are not at risk of extinction in the MRBA region.                                                                                                 | 2b       | The plan does not include any statements about dingoes being at risk of extinction.                          | No           |

| Submission Number | Summary of Comment or Key Issue                                                                                                                                                                                                                                                                                                                                                                    | Criteria | Response                                                                                                                                                                                                                                                      | Plan Amended |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| 8; 9              | The cultural importance of dingoes to Badimia people needs to be balanced with wild dog control to support viable livestock operations, but also to protect biodiversity and for community safety)                                                                                                                                                                                                 | 2d       | Already addressed in the draft management plan.                                                                                                                                                                                                               | No           |
| 9; 11             | Recommend a more balanced targeted approach to wild dog control in the Badimia parks and reserves - targeting areas where they pose a direct threat to livestock, while employing greater flexibility in wild dog control where impact on agriculture is less pronounced. Control programs could also be seasonally adjusted or geographically targeted to limit conflict with cultural practices. | 2d       | The submitter's recommendation of a balanced approach is already addressed in the draft joint management plan. The more specific examples of how this might be achieved are noted and will be taken into consideration as the management plan is implemented. | No           |
| 12                | Wild dogs are declared pests for the whole of Western Australia under section 22 of the <i>Biosecurity and Agriculture Management Act 2007</i> and accordingly are managed by DPIRD. However, the responsibility for wild dog control rests with all land managers, regardless of whether the land is private or public.                                                                           | 2d       | Already addressed in the draft management plan.                                                                                                                                                                                                               | No           |
| 12                | Efficient management of wild dogs within the Badimia parks and reserves, including fencing, baiting, and trapping best practices noted under both the WA and National Wild Dog Action Plans, needs to be a priority within the draft management plan to protect not only livestock on neighbouring pastoral stations, but also native fauna within and surrounding the parks and reserves.         | 2d       | The draft plan included strategies about wild dog control in the Badimia parks and reserves.                                                                                                                                                                  | No           |
| 8; 9; 11          | Effective control measures must be maintained to address the significant economic loss from the impacts of wild dogs (as defined under the <i>Biosecurity and Agriculture Management Act 2007</i> and including dingos of various purity) to livestock producers and regional economies.                                                                                                           | 2d       | The draft plan already acknowledged these matters and included strategies about wild dog control in the Badimia parks and reserves.                                                                                                                           | No           |
| 9                 | Wild dog control activities must only be carried out by authorised persons, such as the LPMTs contracted to the biosecurity associations, or by landowners or land- managers who hold all of the relevant permits.                                                                                                                                                                                 | 2d, 2c   | No amendment proposed.                                                                                                                                                                                                                                        | No           |
| 8; 9; 11          | Wild dog populations are persisting and thriving in landscapes transformed by human development, with impacts on pastoral operations and mixed farming enterprises. Records show that wild dog control has reduced the economic impact on these activities. Any reduction or cessation of control activities would see an                                                                          | 2d       | The draft plan already acknowledged impacts of wild dogs on neighbouring land uses such as pastoral operations. The plan also already included strategies about wild dog control in the Badimia parks and reserves.                                           | No           |

| Submission Number | Summary of Comment or Key Issue                                                                                                                                                                                                                                                                                                                                          | Criteria | Response                                                                                                                                    | Plan Amended |
|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------|--------------|
|                   | increase in numbers of wild dogs and associated livestock and economic losses.                                                                                                                                                                                                                                                                                           |          |                                                                                                                                             |              |
| 9                 | Our biosecurity group efforts to control wild dogs manage to just maintain the wild dog populations at levels which also allow pastoralists to produce livestock with most livestock now being cattle.                                                                                                                                                                   | 2b, 2d   | Noted. No amendment proposed.                                                                                                               | No           |
| 9                 | Wild dogs from the Badimia parks and reserves can easily move onto pastoral leases and cause substantial damage to livestock on neighbouring property.                                                                                                                                                                                                                   | 2b, 2d   | Already addressed in the draft management plan.                                                                                             | No           |
| 9                 | Licensed Pest Management Technicians (LPMTs) report that high numbers of sightings/evidence of wild dogs immediately adjacent to National Parks and Nature Reserves where their access to conduct wild dog control is restricted.                                                                                                                                        | 2d       | The plan already recognises landholders' responsibilities under section 22 of the <i>Biosecurity and Agricultural Management Act 2007</i> . | No           |
| 9                 | Unmanaged wild dog populations can result in significant attacks on livestock which is a significant animal welfare issue, but also brings emotional stress and trauma to the producers who have to deal with such attacks on their livestock.                                                                                                                           | 2b       | Noted. No amendment proposed.                                                                                                               | No           |
| 8; 9              | Total predation pressure on native animals is a concern, be it from wild dogs including dingos, cats and foxes (which often target the same prey species). Comment made in context of ideas countering idea of mesopredator release and wild dogs effectively suppressing fox and cat populations.                                                                       | 1e       | Text amended where applicable to refer to feral predators more broadly.                                                                     | Yes          |
| 8; 9; 11; 12      | Wild dogs (including dingos) impact native fauna too, including threatened/vulnerable species, so a whole of landscape approach is needed to managing wild dogs for biodiversity conservation purposes as well as to protect against economic losses. References study into dingo diet that found they consume a wide range of prey including a variety of native fauna. | 1e       | Text amended where applicable to refer to feral predators more broadly                                                                      | Yes          |
| 12                | In addition to direct predation, wild dogs carry hydatid worms ( <i>Echinococcus granulosus</i> ), a zoonotic disease that is easily transmitted to humans as well as to many native animals.                                                                                                                                                                            | 2b       | Noted.                                                                                                                                      | No           |

| Submission Number | Summary of Comment or Key Issue                                                                                                                                                                                                                                                                                                                                                    | Criteria | Response                                                                                                                                                                                                                                                                                                                                                                                           | Plan Amended |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| 8; 9              | The impact of unchecked wild dog/s dingo populations on native fauna has implications for the tourism economy - reduced wildlife sightings can diminish the Region's appeal to visitors.                                                                                                                                                                                           | 2b       | Noted. No amendment proposed.                                                                                                                                                                                                                                                                                                                                                                      | No           |
| 8; 9              | Uncontrolled wild dog populations have significant implications for tourism and public safety. Wild dogs can behave aggressively, when food is scarce for example, or if they become accustomed to human presence.                                                                                                                                                                 | 2b       | Noted. No amendment proposed.                                                                                                                                                                                                                                                                                                                                                                      | No           |
| 8                 | Uncontrolled wild dog populations may lead to property damage with far reaching economic consequences in remote communities (e.g. property damage by wild dogs scavenging around human settlements, campsites, farming and mining operations).                                                                                                                                     | 2b       | Noted. No amendment proposed.                                                                                                                                                                                                                                                                                                                                                                      | No           |
| 8                 | Don't agree with management strategies in this section (P 61-62) that are not specific or enough to address the issues and impacts of wild dogs.                                                                                                                                                                                                                                   | 2c       | More detailed and specific strategies are included in operational/implementation plans but not appropriate for a plan of this type with a 10year + timeframe.                                                                                                                                                                                                                                      | No           |
| 8                 | Our organisation seeks collaboration with the JMB and access to the Badimia reserves (buffer zones & 'core areas') to implement wild dog control activities by contracted Licenced Pest Management Technicians (for monitoring, surveillance, targeted baiting and trapping) - this is essential to prevent wild dog incursions into neighbouring pastoral and agricultural lands. | 2d       | The plan already recognises landholders' responsibilities under the <i>Biosecurity and Agricultural Management Act 2007</i> . It also already refers to collaborating with neighbouring landholders, DPIRD and biosecurity groups. More detailed and specific strategies are identified as part of implementation, but not appropriate to include in a plan of this type with a 10year + timeframe | No           |
| 8; 9; 11; 12      | Our organisation is committed to working collaboratively with all stakeholders (including the JMB/Badimia Traditional Owners) to find a balanced culturally sensitive approach to wild dog management, but maintaining effective landscape-scale wild dog control must remain a priority for the protection of agricultural interests, the environment and the community at large. | 2b, 2d   | Noted                                                                                                                                                                                                                                                                                                                                                                                              | No           |

| Submission Number | Summary of Comment or Key Issue                                                                                                                                                                                                                                                                                                                                                                                  | Criteria | Response                                                                                                                                                                                                                                                                                                                                                                                           | Plan Amended |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| 8                 | Submitter requests more detail and clarification on control measures proposed in the DJMP. More specifically clarification on use of the phrase "where control is required", more details around what liaison with biosecurity groups and DPIRD will involve, who is responsible for determining when control measures are needed and the process for deciding on an "appropriate wild dog management approach". | 2d       | The plan already recognises landholders' responsibilities under the <i>Biosecurity and Agricultural Management Act 2007</i> . It also already refers to collaborating with neighbouring landholders, DPIRD and biosecurity groups. More detailed and specific strategies are identified as part of implementation, but not appropriate to include in a plan of this type with a 10year + timeframe | No           |
| 8                 | If wild dogs are not effectively controlled in the Badimia parks and reserves, submitter requests discussion with Government and the JMB about compensation for livestock losses due to wild dog attacks.                                                                                                                                                                                                        | 2d       | The plan recognises landholder's responsibilities under section 22 of the <i>Biosecurity and Agricultural Management Act 2007</i> .                                                                                                                                                                                                                                                                | No           |
| 8; 9              | If wild dogs are not going to be effectively controlled in the Badimia parks and reserves, submitter requests wild dog standard boundary fencing is installed to contain the wild dog population within the reserves and prevent cross boundary conflicts. Such fencing has been installed with Australian Wildlife Conservancy on the southern boundary of Mt Gibson.                                           | 2f, 2c   | The cost of constructing and maintaining boundary fences adjacent to <i>Conservation and Land Management Act 1984</i> lands generally rests with the neighbouring landholder (section 5.1 Corporate Guideline No. 34 Good Neighbour Guideline)                                                                                                                                                     | No           |
| 9                 | Given specific references in the Good Neighbour Policy to "effective communication", our organisation would appreciate the opportunity to build good relationships with the Badimia people, rather than just receiving information through DBCA.                                                                                                                                                                 | 2g       | The management plan is a joint management plan that was developed by the department and BBBAC, for lands that are jointly held with and jointly managed with BBBAC.                                                                                                                                                                                                                                | No           |
| 5                 | Pastoralism strategies could have corresponding KPIs.                                                                                                                                                                                                                                                                                                                                                            | 2e       | KPIs have been applied where relevant in the plan and have been developed in accordance with agreed parameters.                                                                                                                                                                                                                                                                                    | No           |
| 5                 | The pastoralism section should clarify appropriate management strategies for feral herbivores.                                                                                                                                                                                                                                                                                                                   | 1b       | This topic is also covered elsewhere in the management plan so an existing cross reference to the 'Introduced species' - 'Feral herbivores' section has been amended for clarity.                                                                                                                                                                                                                  | Yes          |
| 5                 | Control measures in strategy 2 on Page 62 only refers to dogs - this strategy should be expanded to refer to all stray stock control actions.                                                                                                                                                                                                                                                                    | 2e       | This strategy is specifically intended to only refer to wild dogs.                                                                                                                                                                                                                                                                                                                                 | No           |

| Submission Number                             | Summary of Comment or Key Issue                                                                                                                                                                                                                                                                                                                                                | Criteria | Response                                                                                                                                                                                                                                                                                                                                                            | Plan Amended |
|-----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| 5                                             | The strategies specific to wild dogs on Page 62 do not appear to align to the Badimia Barna Healthy Country Plan.                                                                                                                                                                                                                                                              | 2f       | The draft plan acknowledges the cultural significance of ngubaanu to Badimia. The draft plan also explained that dingoes are recognised as a native species under the <i>Biodiversity Conservation Act 2016</i> , while also being included in the definition of 'wild dogs' and declared pests under the <i>Biosecurity and Agricultural Management Act 2007</i> . | No           |
| Understanding Barna (Research and monitoring) |                                                                                                                                                                                                                                                                                                                                                                                |          |                                                                                                                                                                                                                                                                                                                                                                     |              |
| 5                                             | Understanding Barna is weighted to western practice and priority. The objectives to 'ensure cultural appropriateness', 'advocate' and 'share information' with the JMB is not providing First Nation science prioritisation and should be extensively reviewed. The described intention in this section has the potential to prioritise Badimia people's interest and science. | 1d       | A number of changes made to this section in light of submitters comment.                                                                                                                                                                                                                                                                                            | Yes          |
| Glossary & Appendices                         |                                                                                                                                                                                                                                                                                                                                                                                |          |                                                                                                                                                                                                                                                                                                                                                                     |              |
| 5                                             | The glossary (pg70), note the Major Mitchell Cockatoo name change required and appendix A (pg71), this is partly addressed in appendix B.                                                                                                                                                                                                                                      | 1e       | Corrections made                                                                                                                                                                                                                                                                                                                                                    | Yes          |

# Appendix 1 — Online survey questions

## Badimia parks and reserves

### draft joint management plan: Have Your Say (Copy)

The Badimia Bandi Barna Aboriginal Corporation, Conservation and Parks Commission and the Department of Biodiversity, Conservation and Attractions invite you to comment on the *Badimia parks and reserves draft joint management plan*.

The Badimia parks and reserves cover almost 293,000 hectares of former pastoral lease lands and unallocated Crown lands that are now Lakeside National Park, Lakeside, Barnabinmah, Thundelarra and Gurdurdu conservation parks and Gagarlagu and Biluny Wells nature reserves. The draft joint management plan focuses on the protection and management of culturally and ecologically significant places, landscape features and species and communities, while facilitating sustainable visitor use and commercial opportunities that complement the values of the Badimia parks and reserves.

Please use this online survey to have your say on the management of the Badimia parks and reserves. Feedback received will be considered in the preparation of the final joint management plan.

If you haven't already done so, please click [dbca.wa.gov.au/haveyoursay](https://dbca.wa.gov.au/haveyoursay) to download and review the draft joint management plan.

The public submission period closes on **8 November 2024**.

\* Required

#### Section 1. Registration of interest



To complete your submission (and to assist us if we need to clarify any details in your submission) please provide some details about yourself and your interest in the Badimia parks and reserves.

Questions marked with an asterisk are required for the survey to be complete and registered.

These details will remain confidential, not be used for any other purpose and be securely stored in accordance with the applicable legislation in Western Australia and consistent with any legal obligation.

Thank you.

1

Name \*

2

Contact email or postal address \*

3

Postcode \*

4

What best describes your interest in the Badimia parks and reserves?  
(you can select more than one)

- ☐ Conservation
- ☐ Recreational
- ☐ Cultural
- ☐ Commercial tour operator
- ☐ Industry
- ☐ Government
- ☐ Neighbour
- ☐ Other

## Section 2. Have your say

Please have your say here about the draft joint management plan.

5

Feedback and comments on the draft joint management plan.

You can choose to make general comments on the plan as a whole, or tailor your feedback to specific sections. You may choose to focus your comments on suggested improvements or include important information relevant to the management of the Badimia parks and reserves that you think may not have been considered in the development of the draft joint management plan. \*

### Section 3. Survey close - what happens to your submission?

THANK YOU for your time - your feedback is important, and we appreciate you taking the time to prepare a submission.

A summary of submissions will be made available along with the final joint management plan at <https://www.dbca.wa.gov.au/management/plans>.

Please click SUBMIT to send your submission and exit the survey.

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