



Australian Government
Parks Australia



Report of the Director of National Parks on the preparation of the sixth Kakadu National Park Management Plan

Responses to public comments on the Draft Management Plan



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Director of National Parks

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on the preparation of the sixth
Kakadu National Park Management Plan**

*Responses to public comments on the
Draft Management Plan for Kakadu National Park
Prepared in accordance with Section 370(2) of the EPBC Act*

Contents	Page
1. Introduction	3
2. Kakadu National Park	3
3. Management plans enable activities within Commonwealth reserves	4
4. Planning process	5
5. Features of the new Management Plan	6
6. Comments received on the Draft Management Plan	7
7. Summary	9
Appendices	
A Public comments that resulted in changes to the management plan	
B Public comments that did not result in changes to the management plan	

1. Introduction

The sixth management plan for Kakadu National Park has been prepared in accordance with the *Environment Protection and Biodiversity Act 1999* (EPBC Act) and replaces the fifth management plan prepared under the EPBC Act which ceased to have effect on 31 December 2013.

Since 1 January 2014, Kakadu National Park has been managed under s.357 of the EPBC Act which states:

- (1) While a management plan is not in operation for a Commonwealth reserve, the Director must exercise the Director's powers and perform the Director's functions in relation to the reserve or to a zone of the reserve so as to manage the reserve in accordance with:
 - (a) the Australian IUCN reserve management principles for the IUCN category to which the reserve or zone has most recently been assigned by:
 - (i) a Proclamation made under Subdivision B; or
 - (ii) a management plan that was in operation for the reserve (but is no longer); and
 - (b) if the Director holds lands or seabed included in the reserve under lease—the Director's obligations under the lease.

In doing this, the management of the park has been guided by the actions and principles of the previous management plan until the sixth plan comes into effect.

2. Kakadu National Park

Kakadu National Park covers an area of 19,810 square kilometres within the Alligator Rivers Region of the Northern Territory. Kakadu is the largest terrestrial national park in Australia, extending from the coast in the north to the southern hills and basins 150 kilometres to the south, and 120 kilometres from the Arnhem Land sandstone plateau in the east, through savanna woodlands to the western boundary.

The majority of the Kakadu region is Aboriginal land under the *Aboriginal Land Rights Act* (NT 1976) and has been home to Aboriginal people for over 50,000 years. The Aboriginal people, Bininj in the north and Mungguy in the south, are the traditional custodians of the land.

There is an extensive network of rock art sites in the Kakadu region, recognised to be one of the greatest concentrations of rock art sites in the world. Some of the rock art is estimated to be up to 20,000 years old. This represents one of the longest historical records of any group of people in the world.

The Kakadu region includes a diverse range of landscape types, including lowland savanna woodlands, stone country, rainforest and floodplains and coastal zones. These landscapes dramatically change throughout the year in response to the six seasons recognised by Bininj people in the north and five seasons by Mungguy people in the south of the park. The park contains a diverse range of plants and animals, including high numbers of endemic species in the stone country.

Kakadu National Park was primarily proclaimed in three stages between 1979 and 1991, and inscribed on the World Heritage list for its outstanding cultural and natural values in 1981. Bininj/Mungguy have leased their land to the Australian Government to be jointly managed as a national park. One of the most important features of Kakadu National Park is the ongoing custodianship of the region by Bininj/Mungguy who continue to live in and jointly manage the park.

There are a range of significant threats to the internationally important cultural and natural values of Kakadu National Park. These include the encroachment of weeds, feral animals, altered fire regimes, climate change, loss of Indigenous cultural knowledge and visitor impacts (for example vandalism to rock art sites, dispersal of weeds, high concentrations of visitors at ecologically sensitive sites).

There has been a well-documented decline in small to medium sized native mammals across northern Australia, including within Kakadu National Park. The park now faces the significant challenge of addressing this issue and preventing any further declines or extinctions of native species. These threatening processes, in addition to differing value systems of Bininj/Munguy and a broad range of park stakeholders, pose challenges and opportunities for the management of the park.

Reductions in resources and operational funding over recent years represents an ongoing challenge for the management of Kakadu National Park. This has required the progressive review of management priorities and approaches while continuing to incorporate new approaches for the management of threats.

World Heritage listed Kakadu contributes significantly to the regional and national economy through attracting visitors to Darwin, Jabiru and the greater region. The park attracted over 190,000 visitors in the 2014 calendar year, who came to experience Indigenous culture, ancient rock art sites, to camp, fish, bushwalk, take commercial tours on the wetlands and travel throughout the park. The plan aims to increase visitation to the park, to make new and improved experiences available to visitors, and through the establishment of experience development plans, increase opportunities for Indigenous participation and identify new opportunities for tourism and public investment.

3. Management plans enable activities within Commonwealth reserves

The EPBC Act (ss.354 and 354A) prohibits certain actions being taken in Commonwealth reserves except in accordance with a management plan. These actions are:

- kill, injure, take trade, keep or move a member of a native species; or
- damage heritage; or
- carry out an excavation; or
- erect a building or other structure; or
- carry out works; or
- take an action for commercial purposes.

The EPBC Regulations control, or allow the Director to control, a range of activities in Commonwealth reserves such as camping, bushwalking, commercial activities, commercial fishing, recreational fishing and research. The Director applies the Regulations subject to and in accordance with the EPBC Act and management plans. The Regulations do not apply to the Director or to wardens or rangers appointed under the EPBC Act. Activities that are prohibited or restricted by the EPBC Act may be carried on if they are authorised by a permit issued by the Director and/or they are carried on in accordance with a management plan or if another exception prescribed by r.12.06 (1) of the Regulations applies.

The EPBC Act does not affect the operation of the *Native Title Act 1993* and s.211 in particular, which in certain circumstances allows native title holders to hunt (and undertake other activities) in the exercise of native title rights without a permit or licence (s.8 EPBC Act). Prohibitions and other provisions of the EPBC Act and EPBC Regulations dealing with activities in Commonwealth reserves do not prevent Indigenous people from continuing their traditional use of an area in a reserve for hunting or gathering (except for purposes of sale), or for ceremonial and religious purposes, in accordance with the EPBC Act s.359A.

Section 358 allows the Director to grant a lease or a licence relating to land or seabed in a Commonwealth reserve in accordance with a management plan.

Access to biological resources in Commonwealth areas is regulated under Part 8A of the EPBC Regulations. Access to biological resources is also covered by ss.354 and 354A of the EPBC Act if the resources are members of a native species and/or if access is for commercial purposes.

Mining operations are prohibited in Kakadu National Park by the EPBC Act (s.387).

4. Planning process

In 2011-12, a technical audit on the implementation of the fifth plan was undertaken to assess the progress of the plan and to provide recommendations for the development of the sixth plan. Nine independent auditors with expertise in different areas covered by the plan were engaged to evaluate whether the actions and policies in the fifth plan were implemented and assess whether they successfully met the aims in the plan.

The technical audit of the fifth plan made the following recommendations about areas for improvement:

- monitoring and reporting to provide evidence-based measures of progress
- monitoring and treatment of weeds and feral animals
- addressing the decline in native species, notably small to medium sized mammals
- improving consultation processes with Bininj/Mungguy
- improving opportunities for employment and contracting of Bininj/Mungguy
- assisting with proposals for establishing new living areas in the park

The audit also suggested there should be a clearer link (or line of sight) between the park's management actions and outcomes, and that the performance indicators in the plan should be able to clearly demonstrate if the park is achieving the desired outcomes and objectives. The new plan has been prepared taking into account this feedback.

In February 2012, consistent with s. 368 (1) (a) of the EPBC Act, a notice was published in the *Australian Government Gazette*, *The Australian* and the *NT News* newspapers inviting comments on the proposal to prepare a draft management plan. A notice was also placed on the department's website. A printed *Have Your Say* brochure was circulated amongst landowners and other stakeholders to stimulate awareness of the planning process and the opportunity to contribute to the plan. This initial opportunity for public comment closed on 13 April 2012 and seven submissions were received.

Following consideration of the issues raised within these submissions, the Director and the Board then prepared a draft plan in accordance with s.368 (1) (b) of the EPBC Act. This was released for public comment on 3 December 2014 and closed on 14 February 2014, allowing a much longer period than the required 30 days under the EPBC Act.

Invitations to comment on the draft plan were published on the department's website, in the *Australian Government Gazette* and in *The Australian* and *NT News* newspapers. Copies of the draft plan were sent to stakeholders with an invitation to comment (including those who provided comments towards the preparation of the draft plan). Copies of the draft plan were also available from the park, from the department's website and through the department's Community Information Unit.

There were 31 written submissions received from a range of stakeholders in accordance with s.368 (1) (e) of the EPBC Act. The Board of Management met twice to discuss the comments on the draft plan and an additional one day out of session meeting was held by Board members to discuss the last outstanding issues and adjustments necessary to finalise the plan.

5. Features of the new management plan

Consistent and enabling

- Much of the substance of the management plan is consistent with the intent and direction of the previous plan. The plan consists of three parts. Part A provides a description of the park and explains the management planning framework. Part B sets out some general provisions and importantly assigns the park to an Australian IUCN management category. Lastly Part C sets out how the park will be managed. The plan applies the requirements of the EPBC Act and associated regulations and provides greater flexibility in management arrangements than the previous iteration.
- The plan provides for the conduct of park management and certain recreational and commercial activities that would otherwise be prohibited by the EPBC Act. It does not alter existing management arrangements so as to place any additional burden on individuals or businesses compared to the previous management plan.
- The plan covers the on-going protection and management of the natural and cultural values of the park, particularly through the management of fire, the control of weeds and feral animals and responding to and mitigating the impacts of climate change.
- An emphasis is placed on the importance of taking a regional approach in the management of the park, acknowledging that it is part of a much larger natural, cultural and social landscape. The park will work with neighbours and government partners towards effective management of regional ecosystems.
- More generic language has been used in this plan. This allows for reasonable responses to maintain or enhance park values in the face of unforeseen circumstances and to provide an adaptive framework to deal with the uncertainties of climate change and its implications for the management of the park over the life of the plan.

A strategic and adaptive approach to management of natural and cultural values

- A range of plans and strategies will be developed and/or reviewed during the life of the plan to improve the conservation and presentation of the natural and cultural values of the park. These include:
 - ▶ training strategy
 - ▶ fire management strategy
 - ▶ threatened species strategy
 - ▶ tourism master plan
 - ▶ walking strategy
 - ▶ crocodile management strategy
 - ▶ cultural heritage strategy
- In addition to ongoing activities, there are a significant number of actions detailed in the plan. These include the review of the existing plans and strategies described above. To achieve best practice management of the park it will be important to develop an effective implementation plan for the next decade, capable of being responsive to new issues and adaptive as knowledge and practices improve.
- Kakadu is a significant site for ecological research and monitoring for individuals and organisations, based in Australia and overseas. Parks Australia is a partner on a number of research projects aimed at improving our knowledge about the park's natural and cultural values and the management of threats. The Parks Australia management effectiveness framework provides a way to improve the integration of the results of this research into decision making and to adapt our management activities.

A review of joint management arrangements

Parks Australia has commenced a review of joint management arrangements for Kakadu, Booderee and Uluru-Kata Tjuta National Parks. The review will strive to consider and better understand the aspirations of traditional owners, to improve opportunities for Indigenous participation and to increase benefits to traditional owners. The new management plan supports this approach and work will occur during the life of this plan to improve joint management arrangements. The plan also requires that a review of the current joint management arrangements will take place during the life of the plan with a view to improving engagement of traditional owners in the overall governance and work programs in the park.

Providing new opportunities for visitors

The Kakadu Tourism Master plan is currently under review and will help plan new experiences for visitors by improving existing roads and providing new walking tracks for visitors to the park. New activities and infrastructure not currently available in the park will also be investigated during the life of the plan to provide more and diverse opportunities and experiences for visitors. New experiences in the park will need to be culturally appropriate, environmentally sustainable and match the desires of the target market for Kakadu.

An improved approach to measuring and reporting our results

One of the key findings from the independent audit of the fifth Kakadu management plan was the need for clearer management objectives, outcomes and measurable performance indicators to allow for improved reporting and accountability. The management plan includes a much stronger focus on management effectiveness, adaptive management and has a clearer line of sight between the cultural and natural values of the park, the desired outcomes of management actions and performance indicators used to measure success. Under the management plan, a performance monitoring plan will be developed and will establish the measures and targets for performance indicators in the plan.

6. Comments received on the draft management plan

The invitation for public comment on the draft plan attracted moderate interest from individuals (12) and from stakeholder organisations and government agencies (19).

A number of submissions suggested the overall International Union for the Conservation of Nature (IUCN) management category for Kakadu should be amended from Category II (national park) to Category IV (managed resource protected area) and that the stone country section of the park should be zoned as Category IB (wilderness area). The Australian IUCN Category assigned to the park dictates the management approach for the area and potentially restricts the range of activities that should be able to occur within the park. For this management plan the Board decided to retain the IUCN Category II designation for the park, and during the life of the new plan consider if changes may be necessary in light of future activity and development proposals.

There were a range of comments regarding joint management arrangements for the park. Some comments were in support of current joint management practices in the park, and some sought improvements in the way that park staff engage and undertake consultations with Bininj/Mungguy. Parks Australia has initiated a review of joint management arrangements within all jointly managed parks, with an aim to improve engagement and consultation processes with traditional owners and related stakeholders.

Submissions from residents of the Northern Territory raised a broad range of issues. Several submissions expressed disappointment and frustration with accessing various parts of the park for camping and fishing due to seasonal closures and safety concerns. Kakadu is subject to seasonal closures as a result of flooding during the wet season, with roads requiring rehabilitation following the wet season to allow safe access for visitors.

Over recent years the park has worked hard to reopen sites as early as possible and has considered early access for commercial operators that can supervise visitors to ensure their safety and wellbeing. The new plan aims to increase opportunities for visitors in the park for camping, bushwalking, cultural experiences and commercial tours.

A range of submissions raised the issue of managing saltwater crocodiles in the park, given that numbers have been increasing since they were first protected across the Northern Territory in 1971. Several submissions suggested culling of saltwater crocodiles may be warranted because of the significant risk to public safety. One submission expressed the view that crocodile egg harvesting should be permitted in the park for commercial purposes (This occurs in some areas of land surrounding the park). Other submissions suggested that temporary closures of areas where there are problem crocodiles is not an effective way to manage the risk to public safety. The crocodile management strategy for the park will address these issues. The harvesting of crocodile eggs within the park will require further investigation and discussion outside the scope of the preparation of the plan.

Submissions from bushwalkers and bushwalking organisations expressed frustration with the process for obtaining bushwalking permits in Kakadu National Park, and the lack of publicly available information about approved bushwalking routes. The development of a walking strategy will take into account these issues and strive to offer a greater range of walking opportunities in the park, with various grades and lengths to suit all walkers.

Several submissions from Northern Territory residents raised concerns about threatening processes for the park including the impact of fire, weeds, feral animals and climate change. The majority of these submissions expressed concern at the increasing encroachment of significant weeds and the number of feral animals in the park, some suggesting regular culls of buffalo and pigs to improve public safety (an activity that does already occur). The park has a range of robust strategies to manage the issues raised, and the approach to the management of these threats will be reviewed as needed during the life of this plan.

A number of comments related to the extent and frequency of fire in the park and suggested a different approach to fire management is needed, including transparency about fire planning. The management of fire across the Parks Australia protected area estate is being reviewed and the approach to fire management in the park is constantly being reassessed to protect and enhance biodiversity, to improve the “patchiness” of the fire landscape and to consider opportunities to reduce the risk of wildfires. A leading Aboriginal Corporation in the park suggested the outsourcing of fire management to Bininj/Mungguy in the park. Such an arrangement can occur under the plan and discussions have already commenced to consider this arrangement, as well as the possible outsourcing of other management activities to Indigenous businesses, potentially increasing Indigenous employment and Indigenous management responsibility.

Through their comments on the plan, the recreational fishing industry sought greater access to areas for recreational fishing, including access to areas that have been closed to fishing to prevent the further spread of salvinia weed and to conserve fish populations. A review of recreational fishing in the park will be conducted early in the life of the plan. This will occur in consultation with stakeholders and will assess the areas both available and closed to the public, the risks of spreading salvinia through the wetlands of the park and the risks associated with saltwater crocodiles, with a view to improving opportunities for recreational fishers in the park.

Some submissions suggested that in the face of declining funding there may be opportunities to obtain assistance from the broader community through the use of volunteers in the park and through partnerships. Strong partnerships arrangements already exist (such as our partnership arrangements with Charles Darwin University) and volunteers frequently assist with projects in the park. Parks Australia is keen to continue pursuing and utilising new partnerships and volunteer arrangements where appropriate, while ensuring that staff and volunteers have safe working arrangements in the park.

The majority of comments on the draft management plan could be catered for under the document. A broad range of useful suggestions were received, which improved the effectiveness of the plan and helped respond to the issues described above. In light of this, the Board made a number of amendments when finalising the plan to improve its capacity to adapt to change, without committing to any significant additional management or stakeholder burden.

An analysis of public comments that resulted in changes to the plan appears at **Appendix A**.

An analysis of public comments that did not result in changes to the plan appears at **Appendix B**.

7. Summary

The Board of Management of Kakadu National Park has worked tirelessly to prepare the draft management plan, to carefully consider all the public comments received, and to finalise the sixth management plan in the light of those submissions. I thank the Board and park planning staff for their patience, their attention to detail and commitment over an extended period in the preparation of this most important document. I would like to thank everyone who contributed ideas and comments throughout the process. Your engagement, participation and interest helps us manage this World Heritage Area, and is greatly appreciated.

The sixth Kakadu National Park Management Plan supports best practice management and will provide essential conservation guidance over the next decade for the management of one of the most popular educational and rewarding visitor experiences in the Northern Territory and Top End region.

Sally Barnes
Director of National Parks
November 2015

Appendix A – Public comments that resulted in changes to the management plan

Plan reference	Comments in the submission	Response
Four Wheel Drive Northern Territory – 4WD Club		
Section 1.1 A description of Kakadu National Park	<p>1. 1.3 Establishment of the park</p> <p>The descriptions of the unresolved land claim in the text are difficult to correlate to the names used in the keys to the map on figure 3. E.g. the Goodparla area is mentioned in the text, but not on the maps, and the Ngombur claim on the map but not in the text. It is difficult to work out which areas are which. It would be helpful if all names used in the text could be found on the map, and likewise all if all the names from the text were on the map especially where there may be some changes e.g. resolution of land claims. This is important given that many of these names are not found on other commonly available maps. Another example is where Koongara area is mentioned in Table 1 but not shown on any maps.</p>	Amended Figure 3 to identify the fourth land claim area in the park.
Section 5.1 Looking after culture	<p>Bininj/Mungguy Cultural knowledge and practices; subheading Bininj/Mungguy access to country (low significance): states “Bininj/Mungguy access to or use of country is sometimes affected by tourism in visitor areas of the park, and this is managed through temporary closure of areas with timely advice to the tourism industry.”</p> <p>The emphasis again is on the tourism industry as opposed to non-commercial visitation. This advice is also important for the public.</p>	Amended Background text in Section 5.1 to acknowledge that timely advice on temporary closures will be provided to the tourism industry and the public. Policy 10.2.4 has also been amended to acknowledge the public as a key stakeholder to be notified of temporary closures.
Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion	Section 6 needs a section dedicated to independent travellers. This could acknowledge their distinctive characteristics compared to those of commercial tourists/operators/local residents	Amended Background text to Section 6.1 to identify the range of traveller types to the park as suggested. The Tourism Master Plan (Action 6.1.6) will consider the specific needs of the range of traveller types to the park, including independent travellers.

Plan reference	Comments in the submission	Response
Four Wheel Drive Northern Territory – 4WD Club		
<p>Section 6.0 Kakadu as a visitor experience destination,</p> <p>commercial tourism and promotion</p>	<p>The explicit articulation of issues pertaining to this group will provide very useful focus and clarity for the plans subordinate to this plan. It will also lead to a clearer assessment of this group [independent visitors], the issues close to them, and the management mechanisms that will address these.</p> <p>The lack of explicit treatment and absence of structured consultation with the public during the development of the plan, leads to a lack of focus and emphasis in the plan on this crucial stakeholder group.</p>	<p>Amended Background text to Section 6.1 to identify the range of traveller types to the park as suggested. The Tourism Master Plan (Action 6.1.6) will consider the specific needs of the range of traveller types to the park, including independent travellers.</p> <p>Appendix E provides a summary of the timeframes and consultation process used in developing this plan and this identifies the opportunities for input from the public on the plan during the Have your say process and the public comment period for release of the draft management plan.</p>
<p>Section 6.0 Kakadu as a visitor experience destination,</p> <p>commercial tourism and promotion</p>	<p>This section lacks delineation between the interests of commercial tourism and recreational visitors. These two groups have a number of things in common and distinctly different interests in others. By not distinguishing between the two, the needs and goals of the two groups are not acknowledged and a lack of clarity occurs. It also does not allow the plan to provide any guidance for the future specifically in relation to each of these groups.</p>	<p>Amended Background text to Section 6.1 to identify the range of traveller types to the park as suggested. The Tourism Master Plan (Action 6.1.6) will consider the specific needs of the range of traveller types to the park, including independent travellers. It is not necessary to describe each type of visitor to the park unless there are restrictions or special provisions in the EPBC legislation that need to be addressed.</p>
<p>Section 6.1 Destination and visitor experience development</p>	<p>In regard to increased visitation to the park, there appears to be much focus on increasing organised commercial tourism. It should be recognised that the majority, that is two thirds of the visitors to the park are independent tourists.</p> <p>Little consideration appears to be given to enhancing the enjoyment of their experience in visiting the park.</p> <p>With any increased commercialisation of park visitation, we believe it must be a priority that this is not at the expense of independent public access and enjoyment of the park.</p>	<p>Amended Background text to Section 6.1 to identify the range of traveller types to the park as suggested. The Tourism Master Plan (Action 6.1.6) will consider in more detail the specific needs of the range of traveller types to the park, including independent travellers.</p> <p>Current precinct planning processes (Action 6.1.7) are helping to identify opportunities for enhanced visitor experiences and guide this process. This may include a 4WD track in the south of the park and new opportunities for overnight bushwalks.</p>

Plan reference	Comments in the submission	Response
Four Wheel Drive Northern Territory – 4WD Club		
Section 6.1 Destination and visitor experience development	By not acknowledging the two groups [independent and commercial visitors], this again leads to a lack of explicit focus on the public. This is evident in the shared vision statement which contains elements focused on the Binji, commercial tourism and preservation of the environment, but nothing in relation to the public and non-commercial tourism e.g. the 'shared vision refers to commercial tourism and development three times, but contains no elements relating explicitly to non-commercial recreational visitors.	The shared vision principles which were included in the draft management plan, and were drawn from the Shared Vision for Tourism in Kakadu National Park (Morse et al. 2005), have been removed from the management plan to enable review during the life of the plan.
Section 6.1 Destination and visitor experience development	The small challenges overcome by the use of a four wheel drive vehicle to access remote sites within the park greatly enhances visitor experiences and yet there is no mention of 4WD recreational touring within the park. This is in contrast to a section on "Recreational boating and fishing". (Section 10.7).	Amended Background to Section 6.1 to include additional text to describe 4WD touring as an existing popular experience. This matter is also covered by the Tourism Master Plan (Action 6.1.6) and via precinct planning (Action 6.1.7) which will further consider the opportunities and experiences of 4WD touring.
Section 6.1 Destination and visitor experience development	There is also no consideration of the enormous growth area of four wheel drive holidays in recent years and to further develop opportunities here. This is an activity which is hugely popular amongst Australians and other visitors alike, yet despite this, there is a desire to improve access to enable other visitors to access areas without the need for 4WD vehicles. Without specific consideration, guidance and perspective about this in the plan, there is a great danger that important experiences will be eroded in the future.	Amended Background to Section 6.1 to include additional text to describe 4WD touring as an existing popular experience. This matter is also covered by the Tourism Master Plan (Action 6.1.6) and via precinct planning (Action 6.1.7) which will further consider the opportunities and experiences of 4WD touring.
Section 9.07 Neighbours, stakeholders and partnerships	4WDNT is open to exploring with Parks Australia, any way in which we can work together in any planning of new tracks and the opening of the many tracks that have been closed since the park was declared. We would also welcome the opportunity to discuss any ways we can assist, such as in the busy period of seasonal opening.	Amended Section 9.7.8 to foster and encourage relationships with volunteer organisations, groups and individuals that participate in and support park activities.

Plan reference	Comments in the submission	Response
Four Wheel Drive Northern Territory – 4WD Club		
Section 10.4 Access	10.4 Road access: Further to our comments in relation to values, road and track development need to be undertaken in accordance with a road/track plan. This plan needs to address the tension that exists between the upgrading roads to improve access, and the value of the journey to destinations along (4WD) roads/tracks. Without a clear strategy to guide road development, it will be difficult to ensure this development supports and enhances the essence that needs to be preserved to maintain the essential character and attraction of Kakadu, and the value of the journey within the park which is a key part of the attraction of the park. To facilitate this, road/track classes could be established as part of the road/track plan, to articulate the target experience for each route.	Amended Background text in Section 6.1 to include reference to 4WD touring as a popular activity. Policy 10.4.5 also amended to include reference to the park road management strategy which is in development and will assist in the strategic management of roads.
Section 10.4 Access	We understand the need to maintain roads and tracks to support a level of access for a wide variety of visitors and tour operators. We also understand that where the recent upgrades to the Jim Jim track occurred, challenges have existed with seasonal degradation of the track, managing the level of maintenance required, increasing the time the tracks are accessible each season and providing a track attractive and suitable for a wide range of users. We also understand that the recent improvements are expected to bed in over the coming season. However we do find the newly treated tracks unpleasantly rough to drive on and not reminiscent of a developed and formed road. We encourage continued exploration of methods of providing balance between demands for improved access and the experience of the journey – and it would be great to see outcomes that don't make them seem too much like developed roads when they are in a track environment like Jim Jim falls.	Amended Background text in Section 6.1 to include reference to 4WD touring as a popular activity. Policy 10.4.5 also amended to include reference to the park road management strategy which is in development and will assist in the strategic management of roads.

Plan reference	Comments in the submission	Response
Four Wheel Drive Northern Territory – 4WD Club		
Section 10.7 Recreational activities	10.7.7 Restricts a range of activities including gliders, ultralight aircraft, hot air balloons and other recreational light aircraft, airboats, amphibious vehicles and hovercraft, non-motorized vessels to only being able to be conducted by commercial operators. Whilst we understand that controls need to be in place for these activities, it is not reasonable to restrict these to only commercial operators. Where non-commercial parties can demonstrate competence and acceptable controls and standards they should also be permitted. This reinforces the impression that Kakadu is not for the public. Even if non-commercial parties rarely undertake these activities, the principle of prohibiting them without discretion of park management is not appropriate.	Amended Section 10.7.7 to allow these activities to be authorised for commercial and non-commercial purposes. The Board was of the view that the assessment of the activity should consider risks and that whether the action was for commercial or non-commercial purposes did not matter.
Section 10.7 Recreational activities	Figure 16: This map is confusing. West Alligator Head is listed as a bush campground but it has toilets and showers. Koolpin and Graveside Gorge (and other sites) are not listed. If this is because permits are required then that is not clear. The difference between unmanaged and bush camp grounds is also not clear.	Amended Figure 16 as suggested.
General comment	5.1 Refers to rock art at Nanguluwurr. This is not shown on a relevant map so there is no way of understanding where this is.	Amended Section 5.1 to include a description of the location of Nangulururr. The proximity of Nangulururr to Nourlangie meant that it was not possible to mark it on the map in the management plan.

Plan reference	Comments in the submission	Response
Aboriginal Areas Protection Authority		
Section 4.1 Making decisions and working together (Board of Management)	Table 3: Guide to decision-making (page 34) should refer to the NTASSA and ensure that Authority Certificates are sought and obtained especially for any non-routine actions proposed either by the Park or any external entity. This would ensure compliance with NTASSA and minimise risk of damage to any sacred sites.	Table 5 amended to include requirement to obtain an Authority Certificate from the Aboriginal Areas Protection Authority where there is potential to have an impact upon a sacred site.
Section 4.2 Making decisions and working together (on country)	4.2.10 should include AAPA with NLC in the review of cultural protocol documents, especially the Sickness Country protocols.	Amended plan as suggested.
Section 4.2 Making decisions and working together (on country)	4.2.7 AAPA suggests that this Action is replicated with a similar wording but to 'facilitate and assist AAPA to carry out its statutory functions in the park, commensurate with park resourcing'.	Amended Action 5.1.4 to recognise the role of the Aboriginal Areas Protection Authority.
Section 5.1 Looking after culture	5.1 of the Draft Plan notes that management of Kakadu's cultural values is guided by the An-garregen Strategy from 2011. AAPA remains disappointed that it was not included in the workshops, preparation and writing of the An-garregen Strategy. Given our statutory roles and functions, the AAPA considers the An-garregen Strategy to be inadequately informed regarding the management and protection of sacred sites in Kakadu and we would seek to be involved in any review or update of that strategy (Action 5.1.5).	Amended Actions 5.1.13 and 5.1.14 to acknowledge the need to work more closely with the Aboriginal Areas Protection Authority in park planning processes and to increase the protection and registration of sacred and other cultural sites, recording and documenting information about them. The An-garregen strategy will be reviewed and updated during the life of the plan.
Section 5.1 Looking after culture	Given the stated principles for joint management in Kakadu, specifically that ...cultural and traditional knowledge, customs values and priorities will be respected and will inform management priorities and programmes (p29), the AAPA has some concerns that the processes of the Sacred Sites Act are not being incorporated sufficiently into the overall management and planning systems within Kakadu. We are particularly concerned that a number of incidents have occurred at sacred sites within the park under the current plan.	Action 5.1.14 amended to read: Work closely with the Aboriginal Areas Protection Authority in park planning processes to increase the protection and registration of sacred and other cultural sites, recording and documenting information about them.

Plan reference	Comments in the submission	Response
Aboriginal Areas Protection Authority		
Section 5.1 Looking after culture	(c) AAPA should be fully engaged for the provision of specialised and expert advice in relation to the management of sacred sites in Kakadu through a variety of processes including the issuing of Authority Certificates where appropriate, input into management strategies/ plans and protocols (including visitor guidelines, bushwalking strategies, precinct plans, signage etc.); and	Action 5.1.14 amended to read: Work closely with the Aboriginal Areas Protection Authority in park planning processes to increase the protection and registration of sacred and other cultural sites, recording and documenting information about them.
Section 5.1 Looking after culture	(d) There should be further development of cooperative approaches to compliance and enforcement strategies utilising both the EPBC Act and the NTASSA.	Action 5.1.14 amended to indicate we will work closely with the Aboriginal Areas Protection Authority in park planning processes to increase the protection and registration of sacred and other cultural sites, recording and documenting information about them.
Section 5.1 Looking after culture	As set out in the draft management plan, the first guiding principle for the management of Kakadu states that: culture, country, sacred places and customary law are one, extend beyond the boundaries of Kakadu, and need to be protected and respected (page iii). Despite this principle/ members of Kakadu's Bininj/Mungguy joint management partners have expressed serious reservations to the Authority about the management of sacred sites within the park, and their capacity to raise these concerns directly with the Park authorities.	Action 5.1.14 amended to indicate we will work closely with the Aboriginal Areas Protection Authority in park planning processes to increase the protection and registration of sacred and other cultural sites, recording and documenting information about them.
Section 5.1 Looking after culture	(a) AAPA should be fully engaged to ensure that its independent and legislatively established register of sacred sites is utilised appropriately by Parks and enhanced through the ongoing sacred site registration work noted at 5.1.13. AAPA is happy to discuss the provision of relevant information on the sacred sites that exist within the park to assist in management and to identify any gaps in knowledge that there may exist;	Action 5.1.14 amended to indicate we will work closely with the Aboriginal Areas Protection Authority in park planning processes to increase the protection and registration of sacred and other cultural sites, recording and documenting information about them.
Section 5.1 Looking after culture	AAPA has longstanding good relations and links with custodians in the Park. Our view is that AAPA offers independent expertise regarding the identification and management of sacred sites in the Park and, if suitably engaged/ can also make a critical contribution to the joint management process and a broad range of the Draft Plan's stated objectives, policies and actions.	Action 5.1.14 amended to indicate we will work closely with the Aboriginal Areas Protection Authority in park planning processes to increase the protection and registration of sacred and other cultural sites, recording and documenting information about them.

Plan reference	Comments in the submission	Response
Aboriginal Areas Protection Authority		
Section 5.1 Looking after culture	AAPA believes that there is potential for greater collaboration with Park management and Bininj/Mungguy custodians to achieve better outcomes in regard to the protection of Sacred Sites.	Action 5.1.14 amended to indicate we will work closely with the Aboriginal Areas Protection Authority in park planning processes to increase the protection and registration of sacred and other cultural sites, recording and documenting information about them.
Section 7.1 Research and knowledge management	We also consider that AAPA can make useful contributions to Actions 7.1.9, 7.1.10 and 7.1.11 given our statutory functions, specialised and expert knowledge and cultural data management systems.	Amended Section 7.1.10 of the plan to clarify that Kakadu National Park staff will work in consultation with the Aboriginal Areas Protection Authority and traditional owners, to develop Indigenous research protocols and review them as needed.
Section 9.05 Assessment of proposals	Table 5: Impact assessment process (page 137) should include a requirement for proponents of any category 2 or 3 actions to obtain an Authority Certificate from AAPA.	Table 5 amended to include a requirement to obtain an Authority Certificate from the Aboriginal Areas Protection Authority where there is potential to have an impact on a sacred site.
Amateur Fishermen's Association of the Northern Territory (AFANT)		
Section 5.3 Managing park wide threats	While we do not support these closures we would be happy to participate or be involved in any research projects even though we believe that the management arrangements in place will show limited impact on the waterways of Kakadu from recreational fishing.	Amended Action 5.3.42 to acknowledge working with relevant stakeholders to monitor the impacts of recreational fishing. The Director recognises that AFANT is the primary association representing recreational fishers in the park and will consult with AFANT when reviewing fishing and boating in the park.
Section 9.07 Neighbours, stakeholders and partnerships	We acknowledge that salvinia management is still an issue in the park and AFANT is willing to work with Kakadu the park and traditional owners on any programs across all waterways to improve the removal of salvinia or through educating rec fishers about protecting our waterways particularly from the spread of salvinia or other introduced plants.	Amended Section 9.7.8 to foster and encourage relationships with volunteer organisations, groups and individuals that participate in and support park activities.
Section 10.7 Recreational activities	AFANT would like the plan to recognise the use of landing nets as a legitimate fishing gear in the park as the plan is unclear on landing nets	Amended Section 10.7 to explain when landing nets are permitted under 12.35(4).

Plan reference	Comments in the submission	Response
Charles Darwin University – Partner in providing tour guide training		
Section 6.2 Commercial tourism development and management	<p>“The park lease agreements between the Director and traditional owners require the Director to implement an induction scheme for tour operators and their guides. In 2005, the Board introduced compulsory entry-level Knowledge for Tour Guides training that can be delivered flexibly – e.g. through e-learning. The training is based on core competencies related to the interpretation of cultural and natural values, minimising visitor impact, understanding permit and licence conditions and cross-cultural awareness. Over 800 guides completed the training in 2013 alone.</p> <p>Reading “Over 800 guides have completed the training since its inception” ...would be a far more accurate representation of 829 guides in total that completed by the start of 2013 and 896 that had completed in total up until the end 2013.</p>	Section 6.2 Background Information amended as suggested to clarify that over 800 guides have completed the training since inception of the program.
Darwin Bushwalking Club		
Section 6.1 Destination and visitor experience development	“As safe as reasonably possible” is an extremely high standard – “as safe as reasonably practical” is more usual and realistic.	Policy 6.1.2 amended as suggested to - visitor experiences in the park will be “as safe as reasonably practical”.
Section 9.07 Neighbours, stakeholders and partnerships	Recently, the Club donated its skills, experience, time and resources to examine a proposed new walking route in the Limmen National Park, and provided a written report to the Park managers. The Club could potentially provide similar support to Kakadu managers.	Amended Section 9.7.8 to foster and encourage relationships with volunteer organisations, groups and individuals that participate in and support park activities.

Plan reference	Comments in the submission	Response
Park resident 1 - (with long term association and history of living in the park)		
Section 1.1 A description of Kakadu National Park	Section 1.3: At the end of the first paragraph should be added the statement: 'This was the first claim heard under the NT Land Rights Act.'	Plan amended as suggested.
Section 2.1 Management plan process	Section 2.1: p.19: List of stakeholders: what about 23 million Australians? They don't have an advocate here.	Amended Section 2.1 to include details of the public consultation process to confirm that the public were invited to provide comments towards the development of the plan and were also given an opportunity to provide comments on the draft plan - which were then considered when finalising the plan.
Section 5.1 Looking after culture	Section 5.1: p45: 'Fire': 'a build-up of weeds or other vegetation close to sites': delete 'weeds or other'. The vegetation in those sites is native vegetation growing where it is not wanted. The one exception regarding weeds is the para grass around the base of ground-level rock art sites at Cannon Hill.	Amended Section 5.1 to note that a build up of any vegetation close to rock art sites poses a significant threat.
Section 5.1 Looking after culture	Section 5.1: p45: 'Insect damage (moderately significant)': It is highly significant, far more significant than feral animals at the present time. Under current policies, unless feral animal eradication by helicopter shooting in remote areas is strongly reinstated as a matter of general policy, that problem will re-emerge.	Amended Section 5.1 so the threat of insect damage is recognised as being 'highly significant' as suggested.
Section 5.1 Looking after culture	Section 5.1: p45: 'Weathering (moderately significant)': This is highly significant, in view of the recentness of X-ray art and the fact that the ochres have a very short life under weathering. The water does not have a dissolving action, it is direct erosion. It takes the pigment straight off. Weathering is thus of high significance in relation to X-ray art. Water seepage through the middle of, for example, a barramundi figure or human figure can be deflected by a drip line, and these should be applied at any site where such paintings are a priority, of which there are many.	Amended Section 5.1 so the threat of weathering is recognised as being 'highly significant' as suggested.

Plan reference	Comments in the submission	Response
Park resident 1 - (with long term association and history of living in the park)		
Section 5.1 Looking after culture	Section 5.1: p.51: '... uranium and other harmful metals': That is a strange statement. What other harmful metals?	Amend Background text to Section 5.1 to improve specificity with regards to other harmful metals.
Section 5.1 Looking after culture	Section 5.1: p.52: 'include some of the oldest Aboriginal occupation sites in Australia': insert the word 'known' into this statement.	Amended plan as suggested.
Section 5.1 Looking after culture	Section 5.1: p.52: Add a further item under 'Existing threats to values': 'Loss of traditional occupancy'.	Amended text on existing threats to acknowledge that in some parts of the park there are limited opportunities to live on country and this contributes to loss of traditional knowledge.
Section 5.1 Looking after culture	Section 5.1: p.54: Third paragraph, on uranium mining: Last line: No mention of royalties. The last sentence in this paragraph also fails to recognise the importance of uranium for the establishment of the Park itself. Mining at Ranger was the catalyst for declaration of Kakadu under Commonwealth administration. The Ranger proposal led to the Fox Inquiry which led to the declaration of a Park that included four resumed pastoral leases as well as the land north of Mudginberri and Munmalary and west of the South Alligator.	Amended the background section on Historic Sites to acknowledge the Ranger proposal and Fox Inquiry as suggested. Bibliography also updated to acknowledge the source.
Section 5.1 Looking after culture	Section 5.1: p.54: First paragraph: It is not known if there was sustained contact between Alligator Rivers people and Macassans. This should instead say 'The first documented knowledge that Aboriginal people from the Alligator Rivers Region had of non-Aboriginal people was of Macassan seafarers, when information of their activities was transmitted from the north coast.' Van Diemen Gulf does not have an eastern opening. Fort Wellington was established on Cobourg Peninsula in 1827.	The background text for the Historic Sites section of the plan has been amended to provide the correct information.

Plan reference	Comments in the submission	Response
Park resident 1 - (with long term association and history of living in the park)		
Section 5.1 Looking after culture	Section 5.1: p.54: Second paragraph: The small-scale activities referred to did not begin in the Kakadu area until the 1890s, or in the case of some of those listed, well into the 20th century. The listing should also refer to mining and prospecting, possibly the most compelling inducement for outsider visitation.	Amended the background section on Historic Sites to acknowledge mining and prospecting as suggested.
Section 5.1 Looking after culture	Section 5.1: p44: 'Performance Indicators': should be redrafted to say 'Impact of fire, flammable or abrasive plant material, insects and animals'. Insects are a major problem. In the past twelve months, people have sat and watched without doing a thing while the head on one of the figures at Nourlangie Rock was completely obliterated by a white ant tunnel. Yet it was easily preventable. Four dollar cans of Permethrin to treat the tunnels are all that is needed.	Amended rock art outcome to recognise that priority rock art sites will be managed to mitigate impacts from threatening processes. Amended the rock art performance indicator to recognise that management will aim to reduce the overall impact that weathering, fire, plants, animals, insects and human activities have on priority rock art sites.
Section 5.1 Looking after culture	Section 5.1: p.54: Outcomes: Replace with: 'Priority historical sites are protected from weathering and natural impacts, fire, ferals and human impacts'. Weathering and natural impacts include tree falls, windblown impacts, termites, burrowing and corrosion. These are inevitable impacts unless specific protection measures are maintained, as also applies to rock art.	In response to this comment and in alignment with the Outcome and Indicator for rock art sites, the Outcome for historic sites has been amended to read: Outcome - Priority historical sites are protected from the potential impacts of threats including weathering, fire, plants, animals, insects and human activities.
Section 5.1 Looking after culture	Section 5.1: p.54: Performance indicators: Replace with: 'Impact of weathering and natural impacts, fire, feral plants and animals, and human impacts on priority historic sites'.	In response to this comment and in alignment with the Outcome and Indicator for rock art sites, the Performance indicator for historic sites has been updated to read: Performance indicator - A reduction in the overall impact of weathering, fire, plants, animals, insects and human activities on priority rock art sites.
Section 5.1 Looking after culture	Section 5.1: p.54: Fourth paragraph, first line: 'people', not 'communities'.	Amended the background section on Historic Sites as suggested.

Plan reference	Comments in the submission	Response
Park resident 1 - (with long term association and history of living in the park)		
Section 5.2 Looking after country	Section 5.2: p.67 Floodplains: ‘a population of the pig-nosed turtle originally thought to be extinct in the area’: replace with ‘a population of the pig-nosed turtle only recently discovered to inhabit the area’.	Amended Section 5.2 re pig-nosed turtle as suggested.
Section 5.2 Looking after country	Section 5.2: p.60 Stone Country: Paragraph 3: Replace ‘development’ with ‘evolution’.	Amended Background text to Section 5.2 Stone Country to clarify that the high rate of endemism is more due to the fact that these species have been protected through isolation from threats compared to their more exposed counterparts.
Section 5.2 Looking after country	Section 5.2: p.60 Stone Country: Last paragraph, second last line: Replace ‘in the escarpment’ with ‘on the plateau’.	Amended to clarify that Bininj/Mungguy have a long history of camping in the stone country and not in the escarpment.
Section 5.2 Looking after country	Section 5.2: p.60 Stone Country: The 32 threatened species should be broken down into plants and animals.	Amended Stone Country values as suggested to identify the number of threatened plant and animal species.
Section 5.2 Looking after country	Section 5.2: p.60 Stone Country: Replace ‘has functioned as a refuge area for plants and animals from fire and changes in climate for millions of years’ with ‘has provided habitat secure from fire and changes in climate for plants and animals for millions of years’.	Amended Background text for Section 5.2 Stone Country as suggested.
Section 5.2 Looking after country	Section 5.2: p.64 Stone Country: ‘Feral cat (highly significant)’: The feral cat is insignificant. The damage the cat is thought to do is a fantasy. See comment on p.84. ‘native species’ should be ‘native animal species’.	Amended text as suggested.
Section 5.2 Looking after country	Section 5.2: p.66 Floodplains: First line: there are large areas of salt flats too.	Amended the background text for Section 5.2 Floodplains to include salt flats as suggested.

Plan reference	Comments in the submission	Response
Park resident 1 - (with long term association and history of living in the park)		
Section 5.2 Looking after country	Section 5.2: p.67 Floodplains: Existing threats to values': Native plants are growing widely in areas where they did not grow in pre-contact times. Extensive areas that were once identifiable as open Aboriginal occupation sites are now completely obscured by native vegetation that is not being managed.	Amended the background text for Section 5.2 Floodplains with regard to the threat "fire" to provide clarification as suggested.
Section 5.2 Looking after country	Section 5.2: p.68 Floodplains: The absence of traditional burning has caused environmental detriment in the form of increased shrub and tree coverage.	Amended the background text of Section 5.2 Floodplains with regard to the threat "fire" to acknowledge that the absence of traditional burning has caused environmental detriment in the form of increased shrub and tree coverage.
Section 5.2 Looking after country	Section 5.2: p.68 Floodplains: 'The spread of weeds such as mimosa and olive hymenachne by pigs through foraging activities is of major concern': Buffalo are far worse than pigs in this respect.	Amended the background text of Section 5.2 Floodplains with regard to the feral animal threat to acknowledge buffalo as suggested.
Section 5.2 Looking after country	Section 5.2: p.70 Lowlands: Second paragraph, first line: Change to 'Woodlands typically grow on sandy or lateritic soils, often shallow and gravelly'.	Amended the background text for Section 5.2 The Lowlands to identify the soil type as suggested.
Section 5.2 Looking after country	Section 5.2: p.70 Lowlands: Add the following: 'Where the woodlands form a riparian fringe to adjoining wetlands a special habitat dominated by Ironwood and Snappy Gums was especially used for wet season camping by Aboriginal people and for buffalo camps in hide shooting days. Similarly the lowlands adjoining the stone country escarpment are often heavily accessed by stone country bird and mammal species e.g. Chestnut-quilled rock pigeon Petrophassa rufipennis, and macropods for feeding forays.	Amended the background text for Section 5.2 The Lowlands to include additional information on Aboriginal use as suggested.

Plan reference	Comments in the submission	Response
Park resident 1 - (with long term association and history of living in the park)		
Section 5.2 Looking after country	Section 5.2: p.70 Lowlands: Last sentence, re dry season being more stressful: This use of the term 'stressful' is, like the term 'refuge', emotional, and it is also a misconception. Ironwood, which is often a co-dominant species, shows vigorous leaf growth and sap flow from September on. Other species only flower after prolonged dry periods.	Amended the background text for Section 5.2 The Lowlands to clarify plant response to the dry season as suggested.
Section 5.2 Looking after country	Section 5.2: p.71 Lowlands: Fire: 'The numerous unplanned and unauthorised fires that are lit along major roads and in the park each year by people travelling through and using the park is a major issue': These fires would have to be lit either by Aboriginal people or Park staff or myself. Other non-Aboriginal people don't do this, and it is not a major issue. They are not the source of big fires. Indeed the best burning regime in Kakadu would have to be the roadside fire areas. Burning is continuous and contributes to isolated unburnt areas persisting. See comment on p.89.	Amended the Background text of Section 5.2 The lowlands to clarify that some unplanned fires may be lit by Bininj.
Section 5.2 Looking after country	Section 5.2: p.72 Lowlands: 'management of pigs, horses, donkeys and buffalo in areas of high density': In all areas where they occur. Observations on damaging impacts to Aboriginal occupation sites on floodplains by buffalo indicates that even two are too many.	Amended Section 5.2.12 (b) to emphasise that feral animal management will occur in areas of high density, but not exclusively in these areas.
Section 5.2 Looking after country	Section 5.2: p.73 Rainforest: Second paragraph: 'Anbinik forms shady canopies and provides an important refuge for other plants and animals': It is usually sterile underneath, as is often the case with trees. The ground is littered with their leaves and nothing grows.	Amended the background text of Section 5.2 Rainforest to clarify the significance of Anbinik as a cool refuge for a range of animals.

Plan reference	Comments in the submission	Response
Park resident 1 - (with long term association and history of living in the park)		
Section 5.2 Looking after country	<p>Section 5.2: p.74 Rainforest:</p> <p>Weeds: ‘Weeds are not currently having a significant impact on rainforest environments in the park’: This ignores the epidemic infestations of Hyptis suaveolens from the 1970s to the 1990s, which are now set to return with the cessation of buffalo control.</p> <p>Now, although there is a low density of buffalo on the woodlands, their concentrated usage of small canopy zones of rainforest is having a heavy-density impact around the South Alligator, and the previous experience with Hyptis is returning.</p>	Amended the background text of Section 5.2 Rainforest to include the issue of Hyptis as suggested.
Section 5.2 Looking after country	<p>Section 5.2: p.75 Riparian fringe:</p> <p>Riparian fringe should be recognised in the Plan as a separate habitat, or else comment should be made either in the Lowlands or Floodplains sections about riparian vegetation. It is not mentioned in this Plan. It is the vegetation found along stream beds and in the inter-zone connecting the lowland savannah with the wetland. It has an association with rainforest, it is characterised by white gum and ironwood, and it is an important Aboriginal area. The greatest concentration of Aboriginal sites are located in this fringe zone, and some of them are ancient, pre-dating the estuarine period. Torres Strait Pigeons nest in the riparian vegetation around Goose Camp.</p> <p>It is relevant to weeds and to buffalo. It is a sub-category within the larger categories of wetlands and lowlands, but some of the factors that are assessed in this Plan in terms of their overall significance for wetlands or lowlands have a specific intensity for the riparian sub-category. It is a sub-category that also has a specific significance for activities still maintained by a few Aboriginal people.</p>	Amended background text in Section 5.2 Floodplains to include additional information about riparian areas and the vegetation found along them.

Plan reference	Comments in the submission	Response
Park resident 1 - (with long term association and history of living in the park)		
Section 5.3 Managing park-wide threats affecting values	<p>Section 5.3: p.80:</p> <p>Weed risk assessment: Para grass is not of very high risk for rainforest. It is more of a problem for sandstone outliers, where the floodplain abuts directly against the sandstone. Fire in para grass in those locations can destroy rock art painted at ground level, particularly secure older art that is otherwise protected by a natural silicon glaze.</p> <p>Feasibility of control: There is no feasibility of control of any of these weeds other than mimosa. Para grass, olive hymenachne and gamba grass cannot be controlled because they integrate visually with other grasses. You can't see them. There is no point in attempting control except to reduce the fire fuel load at specific priority locations, such as to protect ancient rock art and around Leichhardt and Banyan trees. Apart from those cases, partial weed control leaves bare areas that are then reinvaded by the same weed. We have huge fluctuations of salvinia infestations because of the way the seasons accommodate salvinia. In a bad year for salvinia, the weevil can have an impact, but if the season is favourable for salvinia, the weevil is irrelevant. Also see comment on p.69 (5.2.3).</p> <p>Hyptis suaveolens is totally overlooked; it is significant in rainforest. See comment on p.74.</p> <p>Kakadu landscape: There is an inconsistency in categorisation in that the landscape for salvinia is said to be 'Floodplains and wetlands', while for para grass, olive hymenachne and mimosa the term 'Floodplains' is taken to include wetlands.</p>	<p>Amended Section 5.2 Rainforest to include reference to Hyptis.</p> <p>Table 4 prioritising management of weeds in the park has been removed. Prioritisation of weed management will occur in the weed management strategy. Action 5.1.1 includes measures to reduce the fuel loads of weeds around rock art sites.</p>
Section 5.3 Managing park-wide threats affecting values	<p>Section 5.1: p.50:</p> <p>Example 3: boats and vehicles taken off-road without restriction pose the hazard of transferring exotic weeds to new locations. This is an issue that was dealt with in the early years of the Park with regard to Aboriginal vehicles entering the Park from mimosa-infested regions outside the Park, and visiting off-road hunting areas while inside the Park.</p>	<p>Amended Action 5.3.5 to include communication of information on the transfer of weeds on vehicles, trailers and vessels</p>

Plan reference	Comments in the submission	Response
Park resident 1 - (with long term association and history of living in the park)		
Section 5.3 Managing park-wide threats affecting values	<p>Section 5.3: p.84 Feral animals:</p> <p>Buffalo and cattle: BTEC ‘removed most buffalo from the park and enabled disturbed areas to recover’: The recovery of disturbed areas was only limited, because Parks haven’t done the work to reintroduce those plant species that were made locally extinct. And now, if such species were re-introduced onto the floodplain they would probably be uprooted by pigs. And the recovery that occurred in disturbed areas was not natural, because those kinds of vegetation that did recover now exceed in extent the tolerance that Aboriginal people would have had for them in traditional times. It is a complex situation, and this Plan does not show an appreciation of the complexity.</p>	Background text in Section 5.3 Feral animals has been amended to clarify that the removal of buffalo from the park during BTEC enabled some disturbed areas to recover. It would not be possible identify the original vegetation of all areas in the park and undertake revegetation programmes for these areas as suggested by the respondent.
Section 5.3 Managing park-wide threats affecting values	<p>Section 5.3: p.85 Feral animals:</p> <p>Management issues, high priority species: ‘a very significant impact on threatened species and other biodiversity in the park’: Add: ‘Pigs and buffalo also impact on yams and Aboriginal heritage sites’.</p>	Section 5.3 on Feral Animals has been amended to identify that pigs and buffalo have a significant impact on yams and cultural heritage sites as suggested.
Section 5.3 Managing park-wide threats affecting values	<p>Section 5.3: p.89 Fire:</p> <p>Unplanned large late-season fires: ‘enter the park from the western rim of the Arnhem Land Plateau’: the western rim is already in the Park. Needs re-writing.</p>	Section 5.3 amended to read: These continue to be an issue in some areas of the park, in particular within the stone country where fires may originate from neighbouring areas or be ignited by lightning strikes.
Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion	<p>Section 6: p.99:</p> <p>Many of the references to Bininj/Mungguy here are repetitive and simply unreal. These principles could be condensed to one paragraph.</p>	The shared vision principles which were included in the draft management plan, and were drawn from the Shared Vision for Tourism in Kakadu National Park (Morse et al. 2005), have been removed from the management plan to enable review during the life of the plan.
Section 6.1 Destination and visitor experience development	<p>Section 6.1: p.103:</p> <p>Viewing rock art: ‘are provided at these sites to limit visitor access and impacts’: Poorly written. Delete and replace with: ‘are provided to give the best possible controlled experience for visitors at these sites’. The positive side should be given first, and the minimisation of undesirable impacts is secondary.</p>	Amended Background to Section 6.1 (Viewing Rock Art) to use more positive language as suggested.

Plan reference	Comments in the submission	Response
Park resident 1 - (with long term association and history of living in the park)		
Section 6.1 Destination and visitor experience development	Section 6.1: p.103: 'Visitors need to be more actively encouraged to become ambassadors for the park': The quality of the Park experience should make that inevitable. There should be no need to lobby people.	Amended the management issue under Section 6.1 to use more positive language and illustrate that visitors will become ambassadors for the park if they have exceptional experiences in the park.
Section 6.3 Promotion and marketing	Section 6.3.1(f): p.109: There should be some acknowledgement here or elsewhere in this section of the fact that use of the Park is highly circumscribed for about 3 months of the year because of the heat. There have been deaths. Heat exhaustion events are regular at the top of Jim Jim Falls.	Section 9.1 has been updated to include a new management issue on the weather extremes in Kakadu and a new action 9.1.11 on providing appropriate interpretive material to visitors that communicates the steps they need to take to stay safe in the park.
Section 7.0 Research and knowledge management	Section 7: p.113: 'define what species and environments are present in the park': Change 'species' to 'plant and animal species'.	Amended the plan as suggested.
Section 7.0 Research and knowledge management	Section 7: p.113: 'Knowledge derives from: targeted and highly specific scientific experimentation': replace 'experimentation' with 'investigation'.	Amended the plan as suggested.
Section 7.1 Research and knowledge management	Section 7.1: p.115: 'Effective methods for storing, managing and retrieving park data and information are required but are costly': Replace 'required but are costly' with 'essential, notwithstanding cost'.	Amended Section 7.1 to remove reference to costs associated with data storage and management.
Section 9.07 Neighbours, stakeholders and partnerships	(3) Implement new and novel ideas to get many volunteers to frequently assist with weed and feral animal control. These problems are now too big for the park to manage in-house. There are many ways that people can be brought into the park to assist with this work, in a mutually agreeable way. All it takes is a bit of innovation and thinking 'outside the box'. Of course there will be costs involved, but a cost benefit analysis should show that the park would get much more 'bang for its buck' in this way, rather than persisting with the old, in-house methodology.	Amended Section 9.7.8 to foster and encourage relationships with volunteer organisations, groups and individuals that participate in and support park activities.

Plan reference	Comments in the submission	Response
Park resident 1 - (with long term association and history of living in the park)		
Section 9.07 Neighbours, stakeholders and partnerships	(2) The park needs to consider bringing in working volunteers to help with weed control. They could be rewarded for their services in a number of creative ways. Maybe a package deal where they split their activities between real work such as weed control and 'fun' work such as accompanying scientists on sandstone fauna surveys to exotic localities.	Amended Section 9.7.8 to foster and encourage relationships with volunteer organisations, groups and individuals that participate in and support park activities.
Section 10.13 Bringing plants, animals and other materials into the park	Section 10.13: p.184: Provision should be made for the authorised use of horses.	Amended Policy 10.13.12 to provide greater flexibility within the plan with regards to the entry of horses in the future.
Section 10.13 Bringing plants, animals and other materials into the park	Section 6.1.17: p.105: Add a further Action to this list: '6.1.20: Authorise and regulate recreational horse-riding by visitors and residents in Kakadu.' It is ridiculous that this activity is restricted and yet Parks are not allowed by traditional owners to shoot brumbies. Organised recreational riding with guides out of Jabiru or Cannon Hill would be ideal.	Amended Policy 10.13.12 to provide greater flexibility within the plan with regards to the entry of horses in the future.
Section 10.03 Living in the park (outstations and Jabiru)	Section 10.3: p.158: Jabiru: 'r.12.19 – prohibits taking animals into Commonwealth reserves': Review this regulation to allow for the introduction of recreational horse-riding. See comment on p.105.	Amended Section 10.13.12 to provide greater flexibility within the plan for possible horse riding ventures in the park in the future.
Appendices	Section 5.1: p.52: 'Weeds:' 'Exotic plant species' should be the expression used, not 'weeds'.	Amended the glossary of terms to include a definition of "weed". Weed is an accepted term and is used extensively in Australian Government programmes. Exotic plant species can have several interpretations.
General comment	p.iii Guiding principles: 'consultation with Bininj/Mungguy is conducted appropriately (the right way)': the words in brackets are not necessary. Aborigines reading this will know what 'appropriately' means.	Amended the wording of the guiding principles as suggested.

Plan reference	Comments in the submission	Response
Environmental Systems Solutions		
Section 5.1 Looking after culture	<p>A major symposium on cultural heritage was held in the park in 2011 which brought together over 100 Bininj/Mungguy, researchers and other stakeholders to hear about the park's cultural values and consider priorities for management in the future. A cultural heritage information management system (CHIMS) was also developed during the life of the fifth management plan, and cultural data and information is continuing to be uploaded into it.</p> <p>Agree but this is downplaying the intended role of the system.</p> <p>The CIMS is not just about storing data in an archive – it has been designed so that park staff can revisit sites, describe their condition, prescribe and schedule work. The idea is that this system will help parks staff schedule and prioritise future site recording and maintenance works.</p>	Amended introduction of section 5.1 to recognise that the cultural heritage information management system can be used to schedule and prioritise future work as needed.
Section 7.1 Research and knowledge management	<p>Effective methods for storing, managing and retrieving park data and information are required but are costly.</p> <p>Disagree</p> <p>I think this is inaccurate. We think this is very affordable if the correct approach is taken I think there is an assumption that anything related to technology is expensive – this is not the case. In reality, KNP has a variety of technical infrastructure already available that can be used to manage information efficiently and effectively. The park possesses GIS software, PC hardware, networking infrastructure, data collection hardware and software and a Cultural Information Management System (CIMS). What is missing is an overarching plan , methodologies, data model and some basic training that communicates the processes that are required by staff to collect , manage and utilise data effectively. KNP may need to engage an expert (internal or external) that can scope out the information management requirements of the park then devise a logical and inexpensive solution where the available infrastructure is fully utilised.</p>	Amended Section 7.1 to remove reference to costs associated with data storage and management.

Plan reference	Comments in the submission	Response
Environmental Systems Solutions		
Section 7.1 Research and knowledge management	The document states that the storing and retrieval of data is “costly” however we believe that it will be more costly for KNP to not improve their information management practices. Current data collection and management methods (or lack of them) encourage significant work inefficiencies. Decision making can also be blinded by the fact that there is little readily available information that quickly communicates project progress, outcomes of work activities, risks, and the condition of cultural and environmental assets/values.	Amended Section 7.1 to remove reference to costs associated with data storage and management.
Humpty Doo resident 1 (long term park user and Ex Kakadu ranger)		
Section 2.2 Management plan framework	Within the framework of the Threatened Species Strategy, there is an urgent need to learn more about the population status, distribution and biology of the numerous endemic (and near endemic) plants and animals of the stone country. These species should be clearly identified as Kakadu’s “significant species”. The draft plan frequently refers to the park’s “Significant species” even though the reader is not clearly told what they are. I would argue for instance, that - because of its relative abundance and distribution – the Flatback Turtle is not a significant species to Kakadu. Also for the reason of distribution, I would argue that the northern quoll is not a significant species in Kakadu.	Amended Table 2 and Action 5.2.2 to include endemic species as an example of significant species as suggested.
Section 3. General provisions and IUCN category	a zoning scheme could see high quality parts of the park retained as Cat II, including all of the stone country and perhaps the Ramsar listed wetlands.	<p>The Board resolved that the park should continue to be assigned to the IUCN category II – national park as assigned by the previous (5th) management plan. The Board considers that IUCN Category II National Park is not inconsistent with the management of activities in the park.</p> <p>In considering the comments received on zoning the Board however agreed to include in Section 3.4 of the management plan background information on the guidelines that the IUCN provides for assigning protected areas to zones, and clarification regarding the Australian IUCN management principles.</p>

Plan reference	Comments in the submission	Response
Humpty Doo resident 1 (long term park user and Ex Kakadu ranger)		
Section 3. General provisions and IUCN category	There are too many activities happening within the park, which undermine this status.	<p>The Board resolved that the park should continue to be assigned to the IUCN category II – national park as assigned by the previous (5th) management plan. The Board considers that IUCN Category II National Park is not inconsistent with the management of activities in the park.</p> <p>In considering the comments received on zoning the Board however agreed to include in Section 3.4 of the management plan background information on the guidelines that the IUCN provides for assigning protected areas to zones, and clarification regarding the Australian IUCN management principles.</p>
Section 3. General provisions and IUCN category	Reclassification would also help to harmonise the current disconnect between the public face of the Park and the reality of the Park. It would also open an avenue to market the park in a different way.	<p>The Board resolved that the park should continue to be assigned to the IUCN category II – national park as assigned by the previous (5th) management plan. The Board considers that IUCN Category II National Park is not inconsistent with the management of activities in the park.</p> <p>In considering the comments received on zoning the Board however agreed to include in Section 3.4 of the management plan background information on the guidelines that the IUCN provides for assigning protected areas to zones, and clarification regarding the Australian IUCN management principles.</p>

Plan reference	Comments in the submission	Response
Humpty Doo resident 1 (long term park user and Ex Kakadu ranger)		
Section 3. General provisions and IUCN category	More importantly, such a reclassification could go a long way to repair the ailing relationship between Parks Australia (PA) and many of the Traditional Land Owners (TOs). In my experience, TOs often wish to do things that are incompatible within a Cat II national park.	<p>The Board resolved that the park should continue to be assigned to the IUCN category II – national park as assigned by the previous (5th) management plan. The Board considers that IUCN Category II National Park is not inconsistent with the management of activities in the park.</p> <p>In considering the comments received on zoning the Board however agreed to include in Section 3.4 of the management plan background information on the guidelines that the IUCN provides for assigning protected areas to zones, and clarification regarding the Australian IUCN management principles.</p>
Section 3. General provisions and IUCN category	Kakadu is big enough to allow more exploitative or damaging activities (such as more outstations) without substantially harming the natural or cultural values of a Cat V1 Park.	<p>The Board resolved that the park should continue to be assigned to the IUCN category II – national park as assigned by the previous (5th) management plan. The Board considers that IUCN Category II National Park is not inconsistent with the management of activities in the park.</p> <p>In considering the comments received on zoning the Board however agreed to include in Section 3.4 of the management plan background information on the guidelines that the IUCN provides for assigning protected areas to zones, and clarification regarding the Australian IUCN management principles.</p>
Section 5.3 Managing park-wide threats affecting values	(1) Reverse Para Grass and perennial Mission Grass in table 4 on page 80.	Table 4 prioritising management of weeds in the park has been removed. Prioritisation of weed management will occur in the weed management strategy.
Section 5.3 Managing park-wide threats affecting values	Define what action is proposed to deal with the issue of uncontrolled cats and dogs on outstations and Ranger Stations. De-sexing cats and dogs on outstations is a good start. But is it enough?	Additional text added to the background of Section 5.3 - Feral Animals to identify desexing programs that were undertaken in 2014 and the results of these programs.

Plan reference	Comments in the submission	Response
Humpty Doo resident 1 (long term park user and Ex Kakadu ranger)		
Section 5.3 Managing park-wide threats affecting values	“Loss of cultural knowledge.” I think that this applies to all landforms in Kakadu, not just the floodplains. I would have thought that traditional knowledge of the floodplains is the most enduring of all the landforms. This remains the most used environment by Bininj for hunting and fishing etc. Perhaps the least known is the stone country.	Background to section 5.3 (Fire) amended to identify traditional burning as suggested.
Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion	Finally, where is the joy, the enthusiasm, and the ‘sunshine’ in the “Shared Vision Principles”? It reads more like the ten commandments from the mount, than a template for people enjoying themselves.	The shared vision principles which were included in the draft management plan, and were drawn from the Shared Vision for Tourism in Kakadu National Park (Morse et al. 2005), have been removed from the management plan to enable review during the life of the plan. Policy 6.1.1 amended to delete reference to the Shared Vision Principles.
Section 9.07 Neighbours, stakeholders and partnerships	(2) that the park embrace relatively radical and innovative ideas that would see a major role for volunteerism in a greatly expanded research and survey program – designed and supervised by the NT government biologists - in consultation with Kakadu traditional owners and park staff.	Amended Section 9.7.8 to foster and encourage relationships with volunteer organisations, groups and individuals that participate in and support park activities.
Section 10.13 Bringing plants and animals and other materials into the park	(4) That Kakadu enter into a trial to allow tourists to bring their dogs into the park and visit certain destinations – maybe not all.	Amended Section 10.13.8 to provide greater flexibility within the plan with regards to the entry of dogs in the future.
Section 10.5 Commercial use of resources	(2) Section 10.5.5. (b) Should read “where a proposal involves activities that impose significant stress or physical injury to an animal, the proponent to seek approval from an independent Animal Ethics Committee or be required to demonstrate that proposed activities are consistent with animal welfare legislation.”	Amended Section 10.5.5 to provide an example of where animal ethics approval will be required.
Section 10.5 Commercial use of resources	(1) Change the wording “capturing live fish for sale to aquariums and pet shops” to read “capturing live fish for captive breeding and sale of their progeny to aquariums and pet shops”	Amended the Background text of Section 10.5 as suggested.

Plan reference	Comments in the submission	Response
Gundjeihmi Aboriginal Corporation		
Section 5.3 Managing park-wide threats affecting values	<p>6. 1 Existing text (Section 5, Fire, Actions, page 91, item 5.3.24)</p> <p>5.3.24 Develop a set of thresholds and acceptable ranges for fire regimes for all threatened terrestrial animal and plant species, and ensure that fire management is maintained within that range.</p> <p>6.2 Suggested replacement text</p> <p>5.3.24 Develop a set of thresholds and acceptable ranges for fire regimes for all threatened terrestrial animal and plant species for targeted application to relevant habitat, and ensure that fire management at those sites is maintained within that range.</p> <p>6.3 Reason for change</p> <p>To avoid ambiguity about scale and location of application of target fire regimes for particular species and circumstances.</p>	Amended Section 5.3.24 to identify targeted application to relevant habitat as suggested.
Section 5.1 Looking after culture	The Technical Audit also identified a problem with Indigenous hunters who are not Bininj or authorised by Bininj/Mungguy accessing the Park. Clearly, park staff would need to be prepared to make proper distinctions between local Bininj/Mungguy traditional owners and other Aboriginals to address this ongoing problem.	There are difficulties in ascertaining who is authorised to hunt in the park (i.e. who is a Relevant Aboriginal) but the wording of Policy 10.6.1 has been amended to improve specificity. Under Action 5.1.10 a strategy will be developed to promote sustainable customary harvest practices and will further consider the issue of unauthorised hunting.
Section 5.3 Managing park-wide threats affecting values	<p>Attachment 2:</p> <p>Add to Section 9.9</p> <p>6. Progressively transfer all weed and feral animal management work to Bininj organisations in the life of this plan</p>	Section 4.2.6 (d) has been amended to specifically acknowledge threat abatement and fire management activities are aspects of park management to be outsourced to Aboriginal corporations or enterprises where appropriate and where capacity exists.

Plan reference	Comments in the submission	Response
Gundjeihmi Aboriginal Corporation		
Section 5.3 Managing park-wide threats affecting values	<p>7.1 Existing text (Section 5, Fire, Actions, page 91, item 5.3.26)</p> <p>5.3.26 In collaboration with the Darwin Centre for Bushfire Research and other partners, develop an education and communication programme for residents, contractors, tour operators and park visitors on fire to emphasise the essential part fire plays in the ecology of Kakadu but also include the wise use of fire at campgrounds, impacts of wildfire, and fire control methods and responsibilities.</p> <p>7.2 Suggested additional text</p> <p>5.3.27 Structure fire management programs to engage resident Bininj and attract their active support for preventing and reporting unplanned ignitions.</p> <p>7.3 Reason for change</p> <p>Bininj are currently disengaged from present practice and have no incentive to support existing programs. The proposed savanna burning project will offer incentives for locals to prevent, report and extinguish unplanned fires, as has been an important contributor to the WALFA success.</p>	<p>Amended by adding a new action 5.3.27 as follows:</p> <p>5.3.27 Structure fire management programs to engage resident Bininj and attract their active support for preventing and reporting unplanned ignitions.</p>
Section 6.1 Destination and visitor experience development	<p>To this end, the GAC submits that the Australian Government should join the Bininj/Mungguy community in beginning to develop, within 12 months of the life of the Plan, a comprehensive Indigenous Tourism Development Strategy. A coordinated focus on Indigenous planning and engagement in the tourism industry is critical to the Park advancing its other noteworthy tourism strategies. Terms of reference for such a process should be jointly developed by Parks authorities, tourism agencies in the NT and Australian Governments and Bininj/Mungguy.</p>	<p>Amended Action 6.1.8 to include a focus on investigating strategies to enhance Indigenous business opportunities in the tourism industry as suggested.</p>
Section 8.1 Outstations and living on country	<p>Also, in order to better reflect the social reality, an amendment to clause 8.1.4 (at page 119) is required. The words “were established before the national park” should be replaced with “were either established before the national park or have been established since that date with the permission of the Board”.</p>	<p>Amended Policy 8.1.4 as suggested.</p>

Plan reference	Comments in the submission	Response
Gundjehmi Aboriginal Corporation		
<p>Section 5.3 Managing park-wide threats affecting values</p>	<p>9.1 Existing text (Section 5, Climate change, Background, page 93, para 1)</p> <p>5.3.28 The Board may approve fire management activities and projects, including projects carried out by Bininj/Mungguy, that:</p> <ul style="list-style-type: none"> (a) contribute to addressing or minimising the impacts of climate change (b) are additional to and consistent with fire management carried out in accordance with Sections 5.3.17 to 5.3.26 <p>9.2 Suggested replacement text</p> <p>5.3.28 As a matter of priority, the park will work with Bininj/Mungguy to implement a new Bininj/Mungguy-managed savanna burning project that:</p> <ul style="list-style-type: none"> (a) contributes to addressing or minimising the impacts of climate change (b) complements and provides security for fire management carried out in accordance with other provisions of this plan. <p>9.3 Reason for change</p> <p>To recognise the proposed Director commitment.</p>	<p>Amended Policy 5.3.29 to ensure fire management activities and projects complements fire management in Sections 5.3.17 to 5.3.27. Wording of Policy 5.3.29 was drafted in consultation with the Emissions Reduction Fund Division and generally should not be changed. The primary party responsible for developing a new Bininj/Mungguy-managed savanna burning project is not the DNP or the Board.</p>

Plan reference	Comments in the submission	Response
Gundjeihmi Aboriginal Corporation		
<p>Section 5.3 Managing park-wide threats affecting values</p>	<p>10.1 Existing text (Section 5, Climate change, Background, page 94, item 5.3.30)</p> <p>5.3.30 Work with research partners to improve understanding of the carbon cycle within the park and how much carbon is stored and released due to different management actions. Use this information to refine weed, feral animal and fire management strategies to reduce the carbon footprint of the park.</p> <p>10.2 Suggested replacement text</p> <p>5.3.30 Work with research partners to improve understanding of the carbon cycle within the park and how much carbon is stored and released due to different management actions. Use this information to refine all relevant management strategies to minimise the carbon footprint of the park.</p> <p>10.3 Reason for change</p> <p>Many weed management actions will reduce carbon stored in park landscapes (e.g. Mimosa control, Gamba grass control). Conservation objectives will sometimes be best achieved by emissions intensive use of fire (e.g. floodplain burning, resisting woody encroachment of grasslands). Feral animal control may contribute to greater methane emissions from wetlands. It is unreasonable to suggest that the net effects of meeting all obligations on the park's carbon footprint are sufficiently understood to specify outcomes in advance of the research proposed.</p>	<p>Amended Action 5.3.31 as suggested so the individual management strategies are not identified.</p>

Plan reference	Comments in the submission	Response
Gundjeihmi Aboriginal Corporation		
Section 9.06 Resource use in park operations	<p>11.1 Existing text (Section 9.6, Resource use in park operations, Background, page 140, para 3)</p> <p>The park is committed to reducing its carbon footprint and is working with research partners to improve understanding of the carbon cycle and how much carbon is stored and released due to different management actions. This information will be used to refine weed, feral animal and fire management strategies and reduce the carbon footprint of the park (see Section 5.3: Managing park-wide threats affecting park values).</p> <p>11.2 Suggested replacement text</p> <p>The park is committed to manage its carbon footprint actively and is working with research partners to improve understanding of the carbon cycle and how much carbon is stored and released due to different management actions. This information will be used to refine all park management policies and practices to minimise the carbon footprint of the park (see Section 5.3: Managing park-wide threats affecting park values).</p> <p>11.3 Reason for change</p> <p>As in 8.3 above.</p> <p>8.3 Reason for change</p> <p>The current text ignores benefits to the park of using carbon farming mechanisms, and requires strengthening to reflect the proposed commitment.</p>	Amended the background to Section 9.6 as suggested.
General comment	The maps in the plan depicting the Jabiluka and Ranger mineral lease need to be updated. The Ranger mine operates under an authority under the Atomic Energy Act 1953 and is not called a mineral lease. The Ranger mine operates in the Ranger Project Area.	Amended maps within the plan as suggested.

Plan reference	Comments in the submission	Response
Jabiru Town Development Authority		
Section 9.07 Neighbours, stakeholders and partnerships	Should the JTDA be named as a key stakeholder at item 9.7?	Amended the background text of Section 9.7 to include the Jabiru Town Development Authority in the list of regional stakeholders.
Appendices	"West Arnhem Regional Council"/ "WARC" should be included in Appendix F – Glossary and interpretation.	Amended the plan as suggested.
General comment	All references to "West Arnhem Shire Council" should be changed to "West Arnhem Regional Council" – the name was changed at the end of 2013. All references to "Jabiru Town Council" should be changed to "West Arnhem Regional Council".	Amended plan as suggested.
Commercial fisherman		
Section 10.10 Commercial fishing	...Agree with the submission for access to the West Alligator for Barramundi fish transportation and believe that it would provide a much needed access for product providing that participating people are heavily controlled by V.M.S. And rules whereby they can't do the wrong thing...	<p>Amended Background text of Section 5.2 to incorporate information on the importance of the West Alligator River as the only river system in the Top End entirely protected from recreational fishing and boating.</p> <p>The Board resolved not to support the transit of commercial fishing vessels down the West Alligator River for the purpose of unloading their catch to road transport on the Arnhem Highway.</p>

Plan reference	Comments in the submission	Response
Northern Land Council		
Section 1.1 A description of Kakadu National Park	This currently reads “when landscapes formed, human beings transformed themselves into animals and sacred places set themselves into the landscape”. The NLC suggests that this should be changed to “when landscapes formed, ancestral beings transformed themselves into animals and sacred places were created”. (Section 1.2, page 2)	Plan amended as suggested.
Section 1.1 A description of Kakadu National Park	This currently reads: “Some human beings could also transform themselves into animals. We recommend removal of this sentence as it is an inaccurate representation of the dreaming. (Section 1.2, page 2)	Plan amended as suggested.
Section 1.1 A description of Kakadu National Park	This currently reads “Members of a particular clan ... sacred sites in their clan estates”. The NLC suggests that this sentence should read: “Each clan and moieties have a number of totems and emblems. Sacred sites and other special places on each clan estate are the focus of religious life”, because this better describes the relationship between sacred sites and totems.	Plan amended as suggested.
Section 1.1 A description of Kakadu National Park	In the last paragraph on this page, the text after the reference to the ALRA should be replaced with: “In the Kakadu area primary responsibility to land is determined according to traditional Aboriginal law and custom and involves making important decisions about the management of country such as protecting resources and sacred sites. While a person belongs to the clan of their father they still have responsibilities to their mother’s clan estate. Both men and women may be acknowledged as senior traditional Aboriginal owners.” This better describes the means by which traditional ownership is determined.	Plan amended as suggested.
Section 1.1 A description of Kakadu National Park	This currently reads “Through the use of skin groups Aboriginal peoples organise marriages and use skin group names as important ways of addressing and referring to Aboriginal people.” We recommend changing this to “Skin groups are used in regulating marriages and addressing or referring to Aboriginal people in culturally appropriate ways,” because the current form implies that the function and protocols relating to skin groups are a mere social convention and does not capture adequately the pertinent cultural aspects embedded in kinship.	Plan amended as suggested.

Plan reference	Comments in the submission	Response
Northern Land Council		
Section 1.1 A description of Kakadu National Park	<p>The text of the first paragraph on this page should be changed to:</p> <p>“Creation Ancestors were also responsible for the various languages that exist in the Park. These are associated with different tracts of land and the people who own them. The traditional countries of some language groups are large and divided into distinct estates, others are smaller.”</p>	Plan amended as suggested.
Section 1.1 A description of Kakadu National Park	<p>Jeffrey Lee’s statement refers to the integrated natural/cultural landscape, however the following discussion maintains the western dichotomy between “natural” and “human”. As such, we propose the following sentence be amended to read: “The park is a vast and continuous natural environment that comprises four main landscape types, each with distinct natural and cultural values.”</p>	Plan amended as suggested.
Section 5.1 Looking after culture	<p>This section does not adequately address or capture the intangible aspect of culture with regard to rock art and the wording should be strengthened to better capture this. For example the lack of intergenerational transfer of knowledge and loss of knowledge should be listed as the primary threatening process as it is in the mini plan for Kakadu released on 23rd January 2015.</p>	Amended Background text of Section 5.1 as suggested to recognise the lack of intergenerational transfer of knowledge and loss of knowledge as a significant threat to rock art.
Section 5.1 Looking after culture	<p>Actions should clearly reflect protection of values. Values indicate that rock art is “a storehouse of traditional knowledge including stories and law and is a powerful teaching tool for young Bininj/Mungguy” however 5.1.3 only refers to Bininj/Mungguy recording cultural knowledge. 5.3.1 should specify assisting with passing knowledge on to younger generations not just recording of site information.</p>	Amended Action 5.1.3 as suggested.

Plan reference	Comments in the submission	Response
Northern Land Council		
Section 5.1 Looking after culture	<p>Social Issues on p48 states that “The park can support the maintenance of culture through the provision of resources and programmes; however, many factors that influence culture are outside the park’s control, including participation in cultural management programmes and intergenerational transfer of sensitive cultural knowledge.”</p> <p>This sentence lacks clarity in that it states that resources and programmes can be provided, but that participation is beyond control of Parks Australia. Obviously Bininj/Mungguy participation is within the sphere of influence of ‘the park’ (Parks Australia) given that it can develop and run programmes. What this statement seems to be alluding to is that traditional owners must take a leadership role in such programmes. This statement should be rephrased to clarify this. Also, as previously mentioned the term ‘the park’ should be changed to Parks Australia.</p>	Amended Action 5.1.7(f) to include provision of support to facilitate Bininj/Mungguy leadership in management programmes.
Section 5.1 Looking after culture	This section refers only to recording cultural knowledge, not passing it on. The action should be to record and pass on knowledge to younger generations. While it may seem semantic this clarification can affect the manner in which information is recorded and stored and this is important.	Action 5.1.12 amended to read: Assist Bininj/Mungguy to access cultural sites in the park, to record cultural knowledge associated with them, and provide opportunities to pass this knowledge on to younger generations.
Section 5.3 Managing park-wide threats affecting values	Figure 12, p. 78 The An-garregen Strategy is not mentioned as a relevant subordinate strategy under protection of cultural values in the table.	Figure 12 has been amended so that the Cultural Heritage Strategy is identified as a relevant strategy under the outcomes for cultural values, feral animals and fire.
Section 8.1 Outstations and living on country	The Draft Plan states that a consideration when looking at new outstations is that they do not impact on park values. This statement seems to foreshadow a situation where natural values are at odds with cultural values (such as the establishment of an outstation). In line with the vision statement (specifically, “the cultural and natural values of the park are protected and Bininj/Mungguy culture is respected”), the Draft Plan should be careful not to appear to prioritise natural values over cultural values. In the previous plan, the stated aim was “Bininj establish living areas in the Park that meet their needs while minimising the impact on Park values”. This formulation does not imply that either of natural values or cultural values is dominant.	Amended background to Section 8.1 so the desirable aim is that the impact of new outstations on park values is minimised.

Plan reference	Comments in the submission	Response
Northern Land Council		
Section 9.10 Implementing and evaluating the plan	In the fifth plan section 8.9.9 p. 150, point three was as follows: “in the case of any prescribed policy and action that was not implemented, or which failed to achieve the desired aim (s), determination of the cause”. This requirement should remain in section 9.10.10	Amended Section 9.10.11 as suggested to include words from the fifth plan that for any policy or action not implemented during the life of this plan the cause will be determined.
General comment	At various points throughout the plan ‘the park’ is used in different ways, in some instances it refers to Parks Australia, in others, the physical land comprising Kakadu National Park, in others some kind of social entity distinct from traditional Aboriginal owners. If reference is being made to Parks Australia, this name should be clearly stated to avoid ambiguity. Also, a reference to ‘the park’ which implies an entity that is separate from traditional owners should be avoided altogether. (Throughout)	Amended plan as suggested to ensure that "the park" is not used to represent park management, the Director or Parks Australia (i.e. removal of the term: "the park will...." etc.). All remaining occurrences of the phrase "the park" refer to the area of land known as Kakadu National Park.
General comment	The Draft Plan uses a number of different phrases to refer to “traditional Aboriginal owners”, such as “relevant Indigenous people”. The NLC recommends that language is used consistently and ideally reflects statutory definitions, and as such prefers that the term “traditional Aboriginal owner” is used throughout the Plan. (Throughout)	Amended plan as suggested and included a definition of "relevant Aboriginals" which is consistent with the definition in the Aboriginal Land Rights (Northern Territory) Act 1976 to the glossary.
Northern Territory Government		
Section 1.1 A description of Kakadu National Park	The NTG(NTG) recommends updating figures in the draft management plan in 1.4 to reflect the latest figures available, i.e. for tourism this would now read: • Tourism is very important to the regional economy, particularly in terms of employment. For the financial year 2012-13, Tourism NT reported that the direct value of tourism to the Northern Territory was \$821 million GVA (NT TSA 2012-13)) and in 2013-14 the Northern Territory attracted 1.3 million visitors (Tourism NT 2014). It is estimated that in 2012–13 Kakadu National Park attracted 200,260 visitors. In addition to its significant contribution via the tourism market, the park purchases significant quantities of goods and services from regional suppliers.	Amended plan to include the most current data.

Plan reference	Comments in the submission	Response
Northern Territory Government		
Section 1.1 A description of Kakadu National Park	Recommend including a reference to national tourism statistics in the section on the National economy (p.16). This information can be sourced online at http://www.tra.gov.au/publications/tourism-and-the-australian-economy-State_Tourism_Satellite_Accounts.html	Amended plan as suggested.
Section 2.2 Management plan framework	In addition to the lack of clarity around the performance indicators in Part C of the draft management plan, structurally there is often a lack of coherence between the stated 'Outcomes', 'Performance Indicators' identified, 'Management Issues' and related 'Actions'. For example, on (p.103) in 6.1 'swimming' is identified as a management issue, however none of the ensuing actions addresses it.	Amended plan to further improve the line of sight and ensure the management actions are addressing management issues to meet specified outcomes. For instance the following amendment has been made to the Background of section 6.1: <ul style="list-style-type: none"> • Swimming In the hot, tropical climate of the Top End swimming is an enjoyable activity. However, there are a number of potential risks and impacts associated with swimming or entering waters for other purposes, particularly below the escarpment (see Section 9.1: Safety and incident management).
Section 4.3 Bininj/Mungguy training and other opportunities	<p>The NTG recommends that this section specifically identify some of the potential social and economic benefits that may be gained by the Bininj/Mungguy (i.e. identify opportunities that may be allowed under the EPBC Act to deliver on the performance indicators listed in this section).</p> <p>This has been done effectively in section 5.3 (p.77), where it states that 'outsourcing of park weed management and feral control functions within a district, clan estate or specific area of the park to Aboriginal corporations or enterprises will be supported and facilitated where there is capacity to do so'. Similar specific activities could be listed in section 4.3.</p>	Action 4.3.2 was amended to provide adequate information on the approach that will be taken to promote and support opportunities for Bininj/Mungguy enterprises.
Section 4.3 Bininj/Mungguy training and other opportunities	Policy 4.3.2 should recognise the importance of working in collaboration with existing businesses, the broader tourism industry and other stakeholders working within the park.	Amended Action 4.3.1 to better recognise that the Director will work collaboratively with Bininj/Mungguy and existing businesses, the broader tourism industry and other stakeholders within the park to develop partnerships and other ways of increasing opportunities for Bininj/Mungguy that are related to implementation of the plan.

Plan reference	Comments in the submission	Response
Northern Territory Government		
Section 5.1 Looking after culture	AAPA has flagged some concerns about the way in which its processes are incorporated into the overall management and planning systems within KNP, and as such it is AAPA's intention to provide a comprehensive submission to the DNP as it looks forward to enhancing its relationship with PA under the sixth Management Plan for KNP.	Action 5.1.14 amended to acknowledge the need to work more closely with the Aboriginal Areas Protection Authority to increase the protection and registration of sacred and other cultural sites, recording and documenting information about them.
Section 5.1 Looking after culture	The wording used in many of the performance indicators is ambiguous. In the absence of a baseline figure or measurable target, a reflection of whether the aim is to reduce or increase the indicator is important. For example the performance indicator for Rock Art outlined on (p.44) is simply 'impact of fire, feral plants and animals, and humans on priority rock art sites'. The NTG recommends that the wording be changed to include the word 'reduce' in front of 'impact'. (This would more appropriately fit with the performance indicators in other sections). This comment relates to the performance indicator in the 'Bininj/Mungguy cultural sites' and 'Historic sites' sections.	Amended performance indicators for rock art and historic sites to recognise that a reduction in the overall impact of threatening processes at priority sites is the aim of management.
Section 5.1 Looking after culture	Overall the NTG supports the promotion of cultural protocols to the public, visitors and business.	Action 5.1.7(h) amended to include promoting awareness of and respect for cultural protocols and practices.
Section 5.1 Looking after culture	In relation to 5.1.7 (b) the NTG agrees in principle and understands the intent in relation to the support of Bininj/ Mungguy place names, however consideration must be given to the NT Place Names Register, and any changes made would need to be consistent across all collateral including business, road, maps and directional signage.	Amended Action 6.4.2 to recognise that place names will be consistently used and maintained across all collateral.
Section 5.1 Looking after culture	In 5.1.1, the NTG supports the development of an educational program focused on educating both visitors and Bininj/Mungguy about threats to rock art and cultural sites. This may increase overall understanding of threats to cultural sites, while also increasing public / community reporting of damage, and encouraging people to actively look after cultural sites. This would assist in addressing the existing threat in the Historic Sites section, which states that there are 'varying perceptions of the significance and value of historic sites among Bininj/Mungguy, park staff and other stakeholders' (p. 55).	Covered by Action 5.1.20(d) amended to identify opportunities to improve awareness of the significance of heritage sites in the park.

Plan reference	Comments in the submission	Response
Northern Territory Government		
Section 5.2 Looking after country	The NTG advises that the information in 5.2 (p.66), last paragraph is incorrect according to The NTG Fisheries data (logbook returns data). Commercial fishing pressure along the Kakadu coast as a result of the commercial barramundi closures to Chambers and Finke Bays has not increased. It should be noted that the closures included the buy-back of commercial barramundi licences from the fishery, reducing the total number of commercial barramundi licences in the Northern Territory from 20 to 14 commercial licences.	Amended the Background text in Section 5.2 Floodplains to describe only factual information regarding potential for increased fishing pressure in Kakadu resulting from closures under consideration or introduced elsewhere.
Section 5.3 Managing park-wide threats affecting values	While 5.3.35 and 5.3.36 seek to address the management issues relating to ‘direct and indirect visitor disturbance’ (p.96), it is not clear whether these policies will address the specific issues identified (unauthorised fires, collection of firewood, unburied waste, noise pollution, feeding native animals, erosion on walking tracks and roads, vandalism, dust from roads). For example, an education program may be considered to increase visitor awareness about these issues. Additionally, there may be a need to train and support staff in regulation and enforcement activities when dealing with illegal activities in parks and reserves.	Amended plan by adding a new Action 5.3.43 to communicate with park visitors about their direct and indirect impacts on park values to increase awareness and reduce impacts.
Section 5.3 Managing park-wide threats affecting values	In relation to 5.2, the NTG experience in pest animal management programs on Indigenous land has indicated that there are varying opinions within the Indigenous community about management, considerable opposition to management of pest animals, and different values placed on pest animals. If this is also the case within KNP, it may be valuable to include this issue in a ‘management issues’ subsection within each of the Floodplain, The lowlands, and the Rainforest sections. This could be linked to an action, such as to increase Bininj/Mungguy education and awareness of the damage caused by pest animals and the need for management activities to reduce damage.	Amended Background to Section 5.3 on feral animals to better recognise the varying ways that some Bininj/Mungguy view introduced animals. Action 5.3.14 covers communicating with park residents and visitors the impacts of feral animals.
Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion	Overall, the NTG recommends that a significant shift in focus is required to deliver on the objective outlined in section 6 on (p.98): To increase visitation in a sustainable way and provide opportunities for diverse and enriching visitor experiences which are promoted in an appropriate way.	Amended Background to Section 6 to use more positive language to describe how the park will be managed to foster collaboration with the tourism industry and increase visitation.

Plan reference	Comments in the submission	Response
Northern Territory Government		
<p>Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion</p>	<p>Shared Principles 4 and 5: The NTG understands and respects the intent of these principles, however there needs to be an acknowledgement that commercial operators and their investment will require that Bininj/Mungguy understand their responsibilities to participate and support these ventures to realise the benefits. Otherwise the investment and visitation will be lost to alternative destinations.</p>	<p>The shared vision principles which were included in the draft management plan, and were drawn from the Shared Vision for Tourism in Kakadu National Park (Morse et al. 2005), have been removed from the management plan to enable review during the life of the plan.</p> <p>The park is primarily Aboriginal land. As owners of the land, Bininj/Mungguy have the right to direct changes in the impact and direction of tourism on their land. The terms of the Lease to the Director of National Parks includes a range of obligations to ensure that the culture of Bininj is respected and that we ensure that benefits are made available to Bininj as a result of the operation of the park. We cannot impose requirements upon Bininj/Mungguy to participate or support enterprises and developments on their land.</p>
<p>Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion</p>	<p>Related to the overall above, the NTG makes the following comments in relation to the Shared Vision Principles outlined on (p.99):</p> <ul style="list-style-type: none"> • Shared Principle 1: The NTG recommends removal of the word “manage” as the connotation is that this is an all-encompassing role of the Bininj/Mungguy which could potentially inhibit private sector investor interest. 	<p>The shared vision principles which were included in the draft management plan, and were drawn from the Shared Vision for Tourism in Kakadu National Park (Morse et al. 2005), have been removed from the management plan to enable review during the life of the plan.</p>
<p>Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion</p>	<p>Shared Principle 9: The NTG recommends excluding any promise of “profitable investment” and consider rewording to “avenues for investment”.</p>	<p>The shared vision principles which were included in the draft management plan, and were drawn from the Shared Vision for Tourism in Kakadu National Park (Morse et al. 2005), have been removed from the management plan to enable review during the life of the plan.</p> <p>Policy 6.1.1 amended to delete reference to the Shared Vision Principles.</p>

Plan reference	Comments in the submission	Response
Northern Territory Government		
Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion	On (p.100) The NTG recommends removing the last dot point (of three) as it is superfluous and reinforces potential negative perceptions using words such as 'remote' and 'undeveloped'.	Background text to Section 6 amended as suggested.
Section 6.03 Promotion and marketing	The NTG recommends that this section of the draft management plan address any relevant findings from the Kakadu Commercial Image Capture Survey undertaken by parks management in early 2015.	Amended Section 6.3 in include reference to the commercial image capture survey conducted early in 2015 and how the findings of this survey will be used to develop guidelines and improve processes for commercial image capture in the park.
Section 6.1 Destination and visitor experience development	Section 6.1 should give consideration to the development of cycle tracks in and around major population areas (mainly Jabiru and Cooida.). NTG understands that cycling is gaining popularity and some single-use cycle tracks through areas of natural beauty would be an attractive activity option for visitors.	A new Action 6.1.20 added to recognise that consideration will be given to possible development of bicycle riding tracks in and around major population areas. Minor amendments also made to Actions 10.4.6 and 10.7.6 to clarify how bicycle riding is managed in the park.
Section 6.1 Destination and visitor experience development	The NTG recommends 6.1.9 also considers including a reference to investment and upgrade opportunities for existing and new experiences.	Action 6.1.9 amended as suggested.
Section 6.1 Destination and visitor experience development	The NTG recommends 6.1.9 also considers including a reference to investment and upgrade opportunities for existing and new experiences.	Action 6.1.9 amended to include reference to investment and upgrade opportunities as suggested.
Section 6.1 Destination and visitor experience development	The NTG recommends that action 6.1.15 also gives consideration to the importance of encouraging repeat and new visitation.	Amended Action 6.1.15 as suggested to give consideration to the importance of encouraging repeat and new visitation.

Plan reference	Comments in the submission	Response
Northern Territory Government		
Section 6.2 Commercial tourism development and management	6.2.10 cites Australian National Landscapes as a key vehicle to communicate to tourism stakeholders. The NTG recommends that the most appropriate conduits to the industry locally are through the industry development team at the Department of Business, through Tourism NT and the industry membership body Tourism Top End.	Amended Action 6.2.10 to recognise that industry will be engaged in forums through relevant NT government agencies and the Tourism Top End as well as through the Australia's Timeless North National Landscapes Steering Committee.
Section 6.3 Promotion and marketing	<p>6.3.1 sets out that The park will be promoted and marketed in accordance with the Shared Vision Principles, the following key messages, and other messages as determined by the Board:</p> <p>1. Kakadu is an Aboriginal place and a cultural landscape</p> <p>The NTG recognises the importance of this key principle, however, in order to achieve the goal of increased visitation, KNP must act as a holiday destination, before it acts as a place of landscapes. Therefore, the importance of showing KNP in a light that is accessible, appealing (in that it has hotels and guided tours) alongside the unique indigenous culture will create positive impact for the entire offering rather than just reinforcing all the things people already know about KNP when it comes to sight-seeing.</p>	Action 6.3.1 amended to include recognition that when Bininj/Mungguy sites are closed for cultural reasons that the closure will be announced in order to demonstrate and reinforce that Kakadu is a living cultural landscape.
Section 6.3 Promotion and marketing	In relation to 6.3.3, the NTG does not recommend using the Australia's Timeless North National Landscape as a model for marketing. Australia's Timeless North has little marketing appeal or benefit and in fact is quite detrimental in its description of what's on offer to the consumer, creating a lack of urgency to visit the region. It does not consider the potential visitors perspective and is built on geological, landscape based features, not benefits to the visitor from a holiday perspective. In addition, promotion of the Timeless North brand competes against KNP and adds to the confusion about what is on offer in the park.	Amended Action 6.3.3 to acknowledge Parks Australia will develop a cooperative promotion and marketing strategy with the tourism industry and the Australian and NT Governments as well as other stakeholder groups. Parks Australia considers that the National Landscapes Programme plays an important role in the promotion of nature-based tourism and the park remains a part of the program.
Section 6.4 Visitor information	The NTG recommends that policy 6.4.2 should note that signage along the NTG managed roads should be placed outside Safety Clear Zones and conform to the NTG and national safety policies and guidelines.	Amended Policy 6.4.2 to recognise that signage in the park will be in accordance with the Kakadu Brand Identity Guidelines and all Northern Territory and applicable signage standards and policies, where appropriate and relevant. Policy 6.4.2 also amended to specify that consistency will be maintained across all collateral, including marketing material, business naming, building names, road signage and directional signage.

Plan reference	Comments in the submission	Response
Northern Territory Government		
Section 8.2 Jabiru	<ul style="list-style-type: none"> • (p.121) (para 2) states “Jabiru has had a significant impact on Aboriginal people, lifestyles and traditions in the region.” Similar statement is made at section 8.2.14. • Suggest this statement be removed from the draft management plan; it is subjective and there is no evidence in the draft management plan which supports the statement, including how the Town has had a “significant impact” on Aboriginal people. Rather, the draft management plan should acknowledge that the Mirarr People and the Northern Territory Government, in partnership, have reached in-principle agreement on the future development of Jabiru such that statements noting the harmful impact of the Town on Aboriginal people/challenges etc should be removed). 	<p>Amended the background of Section 8.2 to recognise the significant benefits that Jabiru provides as a commercial and social services hub for the region, including retail, financial, tourism and government services.</p> <p>Also amended Action 8.2.14 to acknowledge the potential beneficial outcomes for Aboriginal people before reference to the possible adverse impacts of Jabiru.</p>
Section 8.2 Jabiru	<p>The following comments from the Solicitor for the Northern Territory address specific details of the draft management plan:</p> <ul style="list-style-type: none"> • (p.121) (para 1) refers to the 2009 agreement to settle the native title claim. The draft management plan should refer to the agreement as “in principle” whenever reference is made to the settlement. 	<p>Amended Policies 8.2.2 and 8.2.3 and action 8.2.13 to reflect the fact that the Jabiru native title agreement has not yet been finalised.</p>
Section 9.01 Safety and incident management	<p>The NTG recommends that 9.1.10 includes additional activities that are high risk to visitors and park residents such as bush walking, camping and the need to carry suitable provisions (e.g. water, food, etc.).</p>	<p>Amended Section 9.1 to include a new management issue that visitors need to be aware that weather extremes do occur in Kakadu and a new action (9.1.11) that appropriate interpretive material will be provided to visitors that communicates the steps they need to take to stay safe in the park.</p>
Section 9.03 Authorising and managing activities	<p>In relation to 9.3.1, it should be noted that in order to make significant capital investment required to establish commercial ventures, businesses require security of tenure for a meaningful period of time (for example upwards of 25 years). If sustainable growth of commercial activity is to occur, the guidelines must allow for long-term leases, with transferrable titles.</p>	<p>Amended Action 9.3.1 as suggested to recognise that subleases and leases will be offered for periods necessary to provide security of tenure to attract and support the level of investment required for tourism activities and developments.</p>

Plan reference	Comments in the submission	Response
Northern Territory Government		
Section 9.04 Capital works and infrastructure	<p>The NTG has responsibility for the care and management of the Arnhem Highway, Kakadu Highway, Old Jim Jim Road, Cooinda Road, Oenpelli Road, including Cahill’s Crossing and Gimbat Road (“the arterial roads”). The arterial roads are public roads under the Land Rights Act and cannot be returned to Traditional Owners, meaning the roads will never formally be Aboriginal land. The Territory managed roads are part of the Territory arterial network, but are also within the park and as such are subject to the Environment Protection and Biodiversity Act.</p> <p>The land underneath the arterial roads may technically be under the Director of Parks, as it was compulsorily acquired by the Australian Government at self-government. It is the opinion of the NTG that this land should revert to roads under the Control of Roads Act. All other roads in the park are under the care control and management of the Director of Parks because these roads do not fulfil an arterial function for the Territory. This is not acknowledged in the draft management plan.</p> <p>The NTG therefore recommends that the care, control and management of the arterial roads be held by the NTG and the land should either be acquired with consent from the Australian Government or by an amendment to the Control of Roads Act to allow Roads in KNP to be managed under the Act.</p>	Amended Section 9.4 to clarify that the Northern Territory Government has responsibility for the arterial road network in the park.
Section 9.05 Assessment of proposals	The NTG advises that the current Impact Assessment Process outlined in Table 5: Impact Assessment Process (p.137) has been problematic in its interpretation and implementation and has led to significant delays for projects. For example, difficulties gaining access to gravel and water has made continued maintenance of unsealed roads difficult and costly.	Amended plan by including a new action 9.5.6 to review the Environmental Impact Assessment guidelines for assessment of proposals. The revised guidelines should prescribe criteria for when proposed actions should be subject to public consultation.
Section 9.05 Assessment of proposals	The NTG recommends that the impact assessment process be reviewed and that particular emphasis be placed on clarifying definitions on what constitutes a moderate (Level 2) versus major (Level 3) capital works or infrastructure upgrade. Without specific definitions this becomes a case of individual interpretation of the management plan.	Amended plan by including a new action 9.5.6 to review the Environmental Impact Assessment guidelines for assessment of proposals.

Plan reference	Comments in the submission	Response
Northern Territory Government		
Section 9.08 Revenue and Business Development	<p>9.8 identifies the opportunity to expand revenue generation opportunities to assist in resourcing park operations. The section identifies one of the management issues as ‘specialist marketing and business skills and expertise are required to develop this area of park management.’ The NTG supports the requirement to address this issue and would be pleased to engage with PA to work collaboratively to implement action 9.8.2.</p> <p>This particular issue, among others, is a good example of something the currently embryonic Jabiru Region Working Group could look into. The plan is an important document in the context of Jabiru’s non-mining future and should be of considerable interest to the Group.</p>	Amended by adding Action 9.8.5 to address the need for specialist marketing and business skills and expertise.
Section 10.3 Living in the park (outstations and Jabiru)	<p>Additionally, it appears that a number of functions and responsibilities that were previously undertaken by the Jabiru Town Council and/or Jabiru Town Development Authority (as per the previous 2007-2014 Management Plan for KNP) have transitioned in the plan to being functions and responsibilities of the NTG or West Arnhem Council under the draft management plan.</p> <p>For example, (p.161) - 10.3.22 The NTG should regularly monitor waste water discharges in and from the town, and water supply quality, and provide reports to the Director. This contrasts to the 2007-2014 Management Plan for KNP (Page 126 – 7.1.9) which states The JTC (or JTDA) should regularly monitor waste water discharges in and from the town, and water supply quality, and provide reports to the Director.</p> <p>The transition of any functions and responsibilities which were previously undertaken by the Jabiru Town Council and/or Jabiru Town Development Authority, and which the NT Government does not have currently, require further consultation and, subject to that consultation, may require amendment to the draft management plan.</p>	Amended Actions 10.2.22 and 10.3.23 to identify West Arnhem Regional Council (or successor to this function) as the responsible authority.
Section 10.3 Living in the park (outstations and Jabiru)	Policy 10.3.25 of the draft management plan (p. 161) states that Northern Territory laws, including Acts, Regulations and by-laws, relating to the town should be amended as required to ensure consistency with the EPBC Act, EPBC Regulations and this management plan. Prima facie, the implication of this requirement is onerous. This policy requires further consultation and subject to that consultation may require amendment.	Action 10.3.24 amended to recognise that laws of the northern territory should be reviewed by the relevant agency where necessary to address any inconsistencies with the EPBC Act, EPBC Regulations or the management plan to avoid unintended inconsistencies.

Plan reference	Comments in the submission	Response
Northern Territory Government		
General comment	Despite the adoption of a Management Effectiveness Framework for this draft management plan, many of the identified management issues are not tied to specific actions or measurable performance indicators and there is limited reference to resourcing within the draft management plan, leaving the detail to be found in poorly referenced subordinate strategies. The NT Government recommends in its response that PA consider including greater detail on the development, implementation, governance and performance assessment of these subordinate strategies, thereby providing a level of confidence that the key management challenges are under control and that the specified actions will be implemented.	Amended the plan to improve the referencing of management strategies that will be used to implement sections of the plan. The management plan is an enabling document. It provides for the development of management strategies to implement actions in the management plan. The Board can undertake public consultation on management strategies developed under the plan (which it recently did for the draft walking strategy). The plan also provides for the development of an implementation schedule for the management plan and a performance monitoring plan.
General comment	The use of community names such as Oenpelli (Kunbarlana) should be consistent with those recognised in the NT Place Names Register. Oenpelli is now known as Gunbalanya. This would be applicable throughout the document.	Amended plan as suggested.
General comment	References made to 'West Arnhem Shire Council' should be changed to reflect the current title 'West Arnhem Regional Council Shire Areas'.	Amended plan as suggested.

Plan reference	Comments in the submission	Response
NT Seafood Council		
Section 10.10 Commercial fishing	<p>Under the Barramundi Management Plan closure lines are used to determine areas and gear permitted for use. The closure line for the East Alligator River (Barramundi Management Plan Schedule 5) is at 2478 E 86560 N to 2478 E 86596 N, which is just below the mouth of Coopers Creek (see Figure 1). In Schedule 6 of the Barramundi Management Plan the 7" net closure line on the East Alligator River is at 2440 E 86620 N to 2440 E 86580 N as shown in Figure 1.</p> <p>Current diagrams of the Kakadu National Park boundary that are available are conflicting in the messaging as to where the Park boundary lies with respect to East Alligator River. For example, Figure 1 which uses geographic shape files available from Government, gives the impression that entry into East Alligator River is in fact entry to the Park. On page 6 and 8 of the Draft Management Plan 2014 maps depict the boundary as being the western bank of the East Alligator River, with a clear and open access to Coopers Creek within East Alligator River.</p> <p>It is the NTSC's understanding that below the tidal limit of the East Alligator River the boundary of the park is the low water mark along the right (i.e. eastern / Arnhem Land) bank of the river.</p>	Amended maps in the plan to clarify that below the tidal limit of the East Alligator River the boundary of the park is the low water mark along the right (i.e. eastern / Arnhem Land) bank of the river.
Senior Research Fellow, Aquatic Ecology and Management, Charles Darwin University		
Section 5.2 Looking after country	<p>The statement 'The park also provides critical habitat for two endangered species of spartooth shark, one of which is endemic to the park, one vulnerable sawfish species and two inshore dolphin species.' is factually incorrect. The park provides critical habitat for: the Critically Endangered Speartooth Shark and the Endangered Northern River Shark (which can collectively be referred to as 'river sharks' (genus Glyphis); neither of these are endemic to the park) and two species of Vulnerable sawfish (Largetooth Sawfish and Dwarf Sawfish). Alternative text to replace the text above is: The park also provides critical habitat for one Critically Endangered and one Endangered species of river shark, two Vulnerable sawfish species and two inshore dolphin species.</p>	Amended the background text for Section 5.2 Floodplains to correct species status as suggested.

Plan reference	Comments in the submission	Response
Commercial tour operator (bushwalking)		
Section 3. General provisions and IUCN category	<p>The IUCN website compares category II to category VI [Managed resource/Protected Area], saying that "Category II will not generally have resource use permitted except for subsistence or minor recreational purposes." Section two mentions that park management could be improved by "assisting with proposals for establishing new living areas within the park." I cannot see how this can possibly be considered consistent with IUCN category II.</p>	<p>The Board resolved that the park should continue to be assigned to the IUCN category II – national park as assigned by the previous (5th) management plan. The Board considers that IUCN Category II National Park is not inconsistent with the management of activities in the park.</p> <p>In considering the comments received on zoning the Board however agreed to include in Section 3.4 of the management plan background information on the guidelines that the IUCN provides for assigning protected areas to zones, and clarification regarding the Australian IUCN management principles.</p>
Section 3. General provisions and IUCN category	<p>The IUCN definition of category VI states that it is, "Protected areas that conserve ecosystems and habitats, together with associated cultural values and traditional natural resource management systems. They are generally large, with most of the area in a natural condition, where a proportion is under sustainable natural resource management and where low-level non-industrial use of natural resources compatible with nature conservation is seen as one of the main aims of the area."</p> <p>Under the heading of 'other objectives', is states that one of these objectives is, "To facilitate inter-generational security for local communities' livelihoods – therefore ensuring that such livelihoods are sustainable." There are many parts of the Draft Plan which talk about Binninj/Mungguy. Many of these are consistent with IUCN category VI. They are not consistent with IUCN category II.</p>	<p>The Board resolved that the park should continue to be assigned to the IUCN category II – national park as assigned by the previous (5th) management plan. The Board considers that IUCN Category II National Park is not inconsistent with the management of activities in the park.</p> <p>In considering the comments received on zoning the Board however agreed to include in Section 3.4 of the management plan background information on the guidelines that the IUCN provides for assigning protected areas to zones, and clarification regarding the Australian IUCN management principles.</p>

Plan reference	Comments in the submission	Response
Commercial tour operator (bushwalking)		
Section 3. General provisions and IUCN category	I am not in a position to say how well joint management is working, but I believe that it would work better if the park were redefined so that the aspirations of the traditional owners were recognised in a way which is not possible with a category II classification.	<p>The Board resolved that the park should continue to be assigned to the IUCN category II – national park as assigned by the previous (5th) management plan. The Board considers that IUCN Category II National Park is not inconsistent with the management of activities in the park.</p> <p>In considering the comments received on zoning the Board however agreed to include in Section 3.4 of the management plan background information on the guidelines that the IUCN provides for assigning protected areas to zones, and clarification regarding the Australian IUCN management principles.</p>
Section 3. General provisions and IUCN category	Overall, I am in general agreement with this section but I think that one problem is that the aims and objectives of a national park cannot ever be in complete harmony with the aspirations and life choices of the traditional owners. As stated in the previous section, changing the IUCN category to category VI would go a long way to overcoming this.	<p>The Board resolved that the park should continue to be assigned to the IUCN category II – national park as assigned by the previous (5th) management plan. The Board considers that IUCN Category II National Park is not inconsistent with the management of activities in the park.</p> <p>In considering the comments received on zoning the Board however agreed to include in Section 3.4 of the management plan background information on the guidelines that the IUCN provides for assigning protected areas to zones, and clarification regarding the Australian IUCN management principles.</p>

Plan reference	Comments in the submission	Response
Commercial tour operator (bushwalking)		
Section 3. General provisions and IUCN category	Kakadu is Aboriginal Land. It is also listed as IUCN category II -- 'National Park'. I have long felt that this was a mistake. Now that I have found and read the IUCN categories, I am more convinced of this than ever.	<p>The Board resolved that the park should continue to be assigned to the IUCN category II – national park as assigned by the previous (5th) management plan. The Board considers that IUCN Category II National Park is not inconsistent with the management of activities in the park.</p> <p>In considering the comments received on zoning the Board however agreed to include in Section 3.4 of the management plan background information on the guidelines that the IUCN provides for assigning protected areas to zones, and clarification regarding the Australian IUCN management principles.</p>
Section 3. General provisions and IUCN category	<p>Comment made in relation to Section 10.3 Living in the park (outstations and Jabiru)</p> <p>As mentioned in section three, much of what is here does not appear to be consistent with IUCN category II. Many of those things are consistent with IUCN category VI.</p>	<p>The Board resolved that the park should continue to be assigned to the IUCN category II – national park as assigned by the previous (5th) management plan. The Board considers that IUCN Category II National Park is not inconsistent with the management of activities in the park.</p> <p>In considering the comments received on zoning the Board however agreed to include in Section 3.4 of the management plan background information on the guidelines that the IUCN provides for assigning protected areas to zones, and clarification regarding the Australian IUCN management principles.</p>

Plan reference	Comments in the submission	Response
Commercial tour operator (bushwalking)		
Section 5.2 Looking after country	As the plan notes, much of the rainforest in Kakadu exists in patches in the stone country. Over the past 40 years, I have seen only slight changes to the boundaries of the rainforest patches. On the other hand, over the past 10-15 years, I have seen a huge increase in the amount of damage due to feral pigs. The Plan says that feral animals are a significant threat. It says, "The decline in yams may be related to activity of pigs." 'May be related' ... I cannot see how there can be any possible doubt. Current management practices do not work.	Amended the background text of Section 5.2 Rainforest to clarify the impact of pigs is likely related to decline in yams.
Section 7.1 Research and knowledge management	While bushwalking tour guides are not qualified to do any significant conservation work, they are certainly qualified to remove potentially damaging vegetation. They are equally qualified to report back on any changes in the condition of those sites. Why not encourage this? It would cost the park nothing and would do an important job which would otherwise remain undone.	Action 7.1.12 added in response to several comments highlighting the significant role stakeholders can play in providing valuable information (e.g. incidental sightings) to park staff. The additional action has been added to include opportunities for citizen science in the park.
Section 7.1 Research and knowledge management	Introduced ants. Giving interested people, especially bushwalkers who visit parts of the park that others seldom visit, a kit so that they could identify and report possible infestations. I often have seen macro photographers on my trips. A good photo early on could make it possible to control an outbreak before it became too big to control.	Action 7.1.12 added in response to several comments highlighting the significant role stakeholders can play in providing valuable information (e.g. incidental sightings) to park staff. The additional action has been added to include opportunities for citizen science in the park.
Section 7.1 Research and knowledge management	<p>"Effective methods for storing, managing and retrieving park data and information are required but are costly."</p> <p>When I read the statement above, I couldn't help but wonder how much work has been duplicated because the original records have been misplaced. I also couldn't help but wonder why it should be costly. That statement almost reads like an admission of defeat.</p>	Amended Section 7.1 to remove reference to costs associated with data storage and management.

Plan reference	Comments in the submission	Response
Commercial tour operator (bushwalking)		
Section 7.1 Research and knowledge management	In the back country, bushwalkers could be issued with information kits so that they could report the locations of any specific weeds of concern. Volunteers could be sought to assist with weed management, particularly if this was done in conjunction with some sort of research project WA Parks did this successfully for many years with their Landscape Expeditions. People paid to assist with research that would otherwise not have been done at all. To minimise use of park resources, park management could set priorities and contract particular projects out to private enterprise. Not only would the work get done, but the park should be able to turn a modest profit.	Action 7.1.12 added in response to several comments highlighting the significant role stakeholders can play in providing valuable information (e.g. incidental sightings) to park staff. The additional action has been added to include opportunities for citizen science in the park.
Section 9.07 Neighbours, stakeholders and partnerships	Finally, with respect to Historic (Balanda) sites, surely this would be an ideal place to use outside volunteers at little or no cost to the park.	Amended Section 9.7.8 to foster and encourage relationships with volunteer organisations, groups and individuals that participate in and support park activities.
Section 9.07 Neighbours, stakeholders and partnerships	I made some suggestions in the previous section about how outside sources could assist with fire management. Another example which to me appears to be a failure to think outside the box came a year or two ago when I offered to bring a group in to help clear and re-mark a walking track. I was told that that wouldn't be a good idea as it would take employment from local Bininj. From an outside perspective, that seemed to be saying that the park had nothing else that those people could do. If Kakadu is to avoid becoming listed as 'World Heritage in Danger', park management will need to be prepared to use all the outside help that they can get for specific operations so that they can use their limited resources on things which would otherwise not get done.	Amended Section 9.7.8 to foster and encourage relationships with volunteer organisations, groups and individuals that participate in and support park activities. The park does obtain assistance from volunteer groups such as Conservation Volunteers Australia and uses a range of volunteers and contractors to provide assistance and expert advice. Bininj do provide advice and assistance particularly where there are cultural sites or places that require a sensitive approach to undertaking. Bushwalking tracks often come within close proximity of sensitive cultural sites, therefore assistance from Bininj is, for the most part, essential.
Section 9.07 Neighbours, stakeholders and partnerships	1) I see the biggest threat to Kakadu as being political/financial. Park management is struggling now, a situation which I believe will get worse. Unless all governments come to see how much benefit Australia gets from international tourism and how cutting park budgets will damage this in the long term, I can't see this getting any better. The only hope I can see is if Kakadu reaches outside the park to enlist support from volunteers, clubs and associations	Amended Section 9.7.8 to foster and encourage relationships with volunteer organisations, groups and individuals that participate in and support park activities.

Plan reference	Comments in the submission	Response
Commercial tour operator (bushwalking)		
Section 9.07 Neighbours, stakeholders and partnerships	<p>I have cited instances where I was able to offer support that could have freed park staff for other work. For whatever reason, those offers were refused. Park management needs to be flexible and look at every possible way to maximise the limited resources at their disposal or it is simply a matter of time before Kakadu becomes listed as a World Heritage property 'In Danger'.</p>	<p>Amended Section 9.7.8 to foster and encourage relationships with volunteer organisations, groups and individuals that participate in and support park activities.</p>
Section 9.07 Neighbours, stakeholders and partnerships	<p>Why not use a bushwalking tour operator like Willis's Walkabouts to assist with fire management? Our liability insurance would cover this. The same would be true of any other tour operator doing similar work. People would feel involved. They would feel that they were doing something which would benefit the park. There is no one else on the ground in the wet season. Sometimes conditions would permit wet season burns, sometimes not. They would never permit a major fire to get out of control. Why not give it a try. it would cost nothing and would mimic what I believe was the most probable traditional burning pattern for the stone country.</p> <p>Given the financial stress that the park is under, that would have to be a win-win situation for all concerned.</p>	<p>Amended Section 9.7.8 to foster and encourage relationships with volunteer organisations, groups and individuals that participate in and support park activities.</p>
Section 10.13 Bringing plants and animals and other materials into the park	<p>When I've stayed in caravan parks in Australia, I've often met grey nomads who are travelling with their dog. Most of these dogs are fairly small and well behaved. Many of those people wouldn't dream of visiting Kakadu simply because they couldn't bring their dog. I don't know how much revenue the park is losing because of this, but it must be substantial.</p> <p>People in Jabiru have dogs. People on outstations have dogs, often far less under control than the dogs accompanying people in their caravans. The Draft Plan notes, "Domestic dogs are often left unattended on outstations when people relocate either temporarily or permanently. The dogs are left to fend for themselves; they scavenge for food and may interbreed with dingoes and become a public safety risk especially around residential areas." If pet dogs are not going to be banned or even properly controlled in outstations or in Jabiru, where is the sense in banning them from the rest of the park?</p>	<p>Amended Section 10.13.8 to provide greater flexibility within the plan with regards to the entry of dogs in the future.</p>

Plan reference	Comments in the submission	Response
Commercial tour operator (bushwalking)		
Section 10.13 Bringing plants and animals and other materials into the park	<p>Pet dogs would pose far less a danger to Kakadu’s wildlife than the wildlife would present to them. I think it would be worthwhile to run a trial where a few campgrounds and a few of the shorter walks were made dog-friendly for a year, or perhaps two so that the word could get out. People living in most Australian cities are accustomed to cleaning up after their pets. It should be the same in Kakadu. If Kakadu were to become the first major Australian park to do this, it would certainly help to counter the ‘Kakadon’t’ message that still exists. It would almost as certainly increase park revenue.</p> <p>Given the state of park finances, I believe that anything which will increase revenue without detracting from park values needs to be considered.</p>	Amended Section 10.13.8 to provide greater flexibility within the plan with regards to the entry of dogs in the future.
Palmerston (Darwin) resident and long term park user		
Section 6.2 Commercial tourism development and management	Commercial tour operators should be reprimanded for clients doing toilet and leaving toilet paper in abundance on the side of the tracks etc. How about using a shovel, or have some sort of portable loo?	<p>Amended Section 9.3 to include additional Action 9.3.7 Develop a range of ecologically sensitive practices to be included in permit conditions to assist in the appreciation and protection of park values.</p> <p>Where evidence is found of such violations to permit conditions action would be taken by park management to ensure that 'leave no trace' practices are adhered to.</p>
Section 7.1 Research and knowledge management	P20 The audits findings suggest that some aspects of Park Management could be improved. Long term local park users could be used for monitoring and reporting to Park Management. E.g. The effects of fire. Spread of exotic weeds; Illegal activities. No encouragement is given to locals to become involved at any level. Local park users could be the eyes and ears for park management i.e. reporting of illegal gill netting (it happens) & hunting. Weed infestations. Breaching bag limits, taking of undersize fish etc.	Action 7.1.12 added in response to several comments highlighting the significant role stakeholders can play in providing valuable information (e.g. incidental sightings) to park staff. The additional action has been added to include opportunities for citizen science in the park.

Plan reference	Comments in the submission	Response
Blue Mountains Conservation Society		
Section 9.05 Assessment of proposals	The Society has a number of concerns about the capacity of the 6th draft Plan of Management (dPoM) for Kakadu National Park to adequately protect the heritage values of this extremely important area. Development in national parks, if it occurs, should be strictly controlled with a prescriptive and transparent assessment process, which allows for public exhibition and comment, and penalties for breaches of the prescribed standards.	<p>Amended the plan to include a new action (9.5.6) to review the Environmental Impact Assessment guidelines for assessment of proposals as a matter of priority.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan, and the Guidelines for EIA in place under the plan are used to protect natural and cultural values. A review of the guidelines will include consideration of the need to seek public comment on certain classes of proposals, such as those which have more than a negligible impact to park values and are likely to be of public interest.</p>
Section 9.05 Assessment of proposals	There should be specifically stated limits to activities which impact on a park's heritage values, as is the case, for instance, for Kosciusko National Park in NSW in which specific bed numbers are stipulated.	<p>Amended the plan to include a new action (9.5.6) to review the Environmental Impact Assessment guidelines for assessment of proposals as a matter of priority.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan, and the Guidelines for EIA in place under the plan are used to protect natural and cultural values. A review of the guidelines will include consideration of the need to seek public comment on certain classes of proposals, such as those which have more than a negligible impact to park values and are likely to be of public interest.</p>

Plan reference	Comments in the submission	Response
Blue Mountains Conservation Society		
Section 9.05 Assessment of proposals	<p>In particular, the Society strongly believes that the 6th dPoM should be amended to include:</p> <p>public listing and description of all development proposals together with the requirement of compulsory public exhibition of each proposal for comment; and,</p>	<p>Amended the plan to include a new action (9.5.6) to review the Environmental Impact Assessment guidelines for assessment of proposals as a matter of priority.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan, and the Guidelines for EIA in place under the plan are used to protect natural and cultural values. A review of the guidelines will include consideration of the need to seek public comment on certain classes of proposals, such as those which have more than a negligible impact to park values and are likely to be of public interest.</p>
Section 9.10 Implementing and evaluating the plan	<p>In particular, the Society strongly believes that the 6th dPoM should be amended to include:</p> <p>provision for a “State of the Park” report during the period of the 6th dPoM that will provide benchmarks for the Plan’s policies and actions.</p>	<p>Amended Section 9.10.8 to include the preparation of a performance monitoring plan which will be used to monitor the performance indicators in the plan. A new action (9.10.7) was also added to specify how the Director of National Park’s will report to the public on performance monitoring in the park.</p>
Bushwalking Australia		
Section 7.1 Research and knowledge management	<p>See comments regarding the use of volunteers under 5.2 above, which can also apply here too. It is likely that bushwalkers undertaking extended trips in the park will be the only visitors through those areas and therefore perfectly placed to assist in say identifying and reporting feral animals and invasive weeds.</p>	<p>Action 7.1.12 added in response to several comments highlighting the significant role stakeholders can play in providing valuable information (e.g. incidental sightings) to park staff. The additional action has been added to include opportunities for citizen science in the park.</p>
Section 9.07 Neighbours, stakeholders and partnerships	<p>Given the immense size and complexity of Kakadu, and the seemingly ever decreasing willingness of the community (and hence government) to provide adequate funds to manage protected areas, Kakadu park management should be looking to employ volunteers to undertake simple and routine works where possible and appropriate. Volunteers play an important role in national parks around the world, including in other parts of Australia.</p>	<p>Amended Section 9.7.8 to foster and encourage relationships with volunteer organisations, groups and individuals that participate in and support park activities.</p>

Plan reference	Comments in the submission	Response
Bushwalking Australia		
Section 9.07 Neighbours, stakeholders and partnerships	In Victoria for example bushwalking clubs and Bushwalking Victoria volunteers under Parks Victoria supervision, undertake activities such as track clearing, track making and constructions, weed removal and spraying and weed identification and mapping. Many of Victoria’s national parks have friends groups that contribute significant volunteer hours to the park they have adopted.	Amended Section 9.7.8 to foster and encourage relationships with volunteer organisations, groups and individuals that participate in and support park activities.
Section 9.07 Neighbours, stakeholders and partnerships	Many of the bushwalking visitors to Kakadu, whether walking independently or with a tour operator like Willis's Walkabouts are likely to be interested in contributing in a practical way to management of the park such as removing fuel from rock art sites in the remote areas they visit on their trip.	Amended Section 9.7.8 to foster and encourage relationships with volunteer organisations, groups and individuals that participate in and support park activities.
Nedlands (WA) resident, visitor and bushwalker		
Section 7.1 Research and knowledge management	<p>5.3 Managing park-wide threats affecting values</p> <p>Bushwalkers go to places that park staff don’t regularly visit. I think it would be useful if bushwalkers were given a small info kit so they could report any sightings of non-native ants or weeds. It is conceivable that this would allow an infestation to be stopped before it got out of hand. Same goes for feral animal populations which seem to be on the rise- especially pigs.</p>	Action 7.1.12 added in response to several comments highlighting the significant role stakeholders can play in providing valuable information (e.g. incidental sightings) to park staff. The additional action has been added to include opportunities for citizen science in the park.

Plan reference	Comments in the submission	Response
Nighthcliff (Darwin) resident		
Section 5.3 Managing park-wide threats affecting values	Actions 5.3.5 “Develop a weed education programme for park residents, contractors, tour operators and visitors” (P 82) This is a great idea but is it going to be implemented?	Amended Actions 5.3.5 and 5.3.26 to develop and implement education programmes on weeds and fire.
Section 5.3 Managing park-wide threats affecting values	<p>5.3.27 “(d) communicating the implications of, and our management response to, climate change.”</p> <p>The above is a policy statement but there is no mention of this in the Actions. I would like to see this communicated to visitors as it maybe one way of showing the impacts of climate change.</p>	<p>Amended by adding a new action 5.3.35 for a communication activity similar to other threatening processes in the plan. Note that this activity is also listed under the current climate change strategy for the park.</p> <p>5.3.35 Communicate information on the implications of, and the park’s management response to, climate change to park residents, contractors, tour operators and visitors.</p>
Humpty Doo resident 2		
Section 7.1 Research and knowledge management	Many locals feel that they have been forgotten by park management and are not considered as stakeholders. It is recognised that Kakadu is a National Park and first and foremost Aboriginal Land. However, there are locals with over forty years experience in use of the park who feel an attachment or affinity with this area also, although obviously not a cultural affinity. Nevertheless, these locals want to contribute and would, by and large, be willing ambassadors for the park, available for data collection with regard to weed infestation, feral animal location and numbers, unauthorised fires, illegal pig hunting and in conjunction with a checklist, monitoring of various other plants, animals or activities that Park Management does not have the resources to conduct.	Action 7.1.12 added in response to several comments highlighting the significant role stakeholders can play in providing valuable information (e.g. incidental sightings) to park staff. The additional action has been added to include opportunities for citizen science in the park.
Section 7.1 Research and knowledge management	P20 "The audit's findings suggest that some aspects of park management could be improved". The use of long term local park users for monitoring and reporting is a resource that is available to park management, but is totally ignored. Long term local park users often observe the effects of fire management practices, weed infestation, feral animal densities and illegal activities. There is no encouragement for locals to become involved at a practical level.	Action 7.1.12 added in response to several comments highlighting the significant role stakeholders can play in providing valuable information (e.g. incidental sightings) to park staff. The additional action has been added to include opportunities for citizen science in the park.

Plan reference	Comments in the submission	Response
Humpty Doo resident 2		
Section 7.1 Research and knowledge management	7.1.9 (c) Members of the public, local park users could be helpful for monitoring a wide range of issues in the park. Check lists could be developed and supplied when permits are issued or even be readily available to those who not requiring a permit. The public could be made to feel that they are contributing to the welfare of the park. Many locals have accumulated a lot of knowledge over the years and although it may not be considered significant it would still contribute to data and statistics.	Action 7.1.12 added in response to several comments highlighting the significant role stakeholders can play in providing valuable information (e.g. incidental sightings) to park staff. The additional action has been added to include opportunities for citizen science in the park.
Section 9.07 Neighbours, stakeholders and partnerships	Many locals feel that they have been forgotten by park management and are not considered as stakeholders. It is recognised that Kakadu is a National Park and first and foremost Aboriginal Land. However, there are locals with over forty years experience in use of the park who feel an attachment or affinity with this area also, although obviously not a cultural affinity. Nevertheless, these locals want to contribute and would, by and large, be willing ambassadors for the park, available for data collection with regard to weed infestation, feral animal location and numbers, unauthorised fires, illegal pig hunting and in conjunction with a checklist, monitoring of various other plants, animals or activities that Park Management does not have the resources to conduct.	Amended by adding Section 7.1.12 to promote opportunities for citizen science in the park.
Professor - Institute for Culture & Society, University of Western Sydney		
Section 4.3 Bininj/Mungguy training and other opportunities	The review [Technical Audit] also identified the need to establish a database of frequency and nature of training and development opportunities for Traditional Owners, in order to assess targets and achievements of the advancement of Traditional Owners into higher level Park service positions, and Guiding and Interpretation roles. This issue is not particular to Kakadu and warrants support and attention.	Amended plan by adding a new action to maintain a database of training and development opportunities for Bininj/Mungguy (Action 4.3.6).

Plan reference	Comments in the submission	Response
Karama (Darwin) resident		
Section 6.2 Commercial tourism development and management	The commercial tour operators should be given a lesson in hygiene when taking people into the park. The amount of toilet paper left on the side of the road, always together, is a disgrace. Do as the long termers do when no facilities are available bury or take it with you.	<p>Amended Section 9.3 to include additional Action 9.3.7 Develop a range of ecologically sensitive practices to be included in permit conditions to assist in the appreciation and protection of park values.</p> <p>Where evidence is found of such violations to permit conditions action would be taken by park management to ensure that 'leave no trace' practices are adhered to.</p>
Colong Foundation for Wilderness		
Section 9.10 Implementing and evaluating the plan	<p>We request that you amend the sixth Kakadu National Park plan of management so that it contains: • Directions for a state of the park report that will benchmark all actions and policies in the plan, to be produced within two years of the publication of the sixth plan of management.</p> <p>Submission page reference: 2</p>	Amended Section 9.10.8 to include the preparation of a performance monitoring plan which will be used to monitor the performance indicators in the plan. A new action (9.10.7) was also added to specify how the Director of National Park's will report to the public on performance monitoring in the park.
Section 9.05 Assessment of proposals	The Colong Foundation is pleased that the sixth draft plan acknowledges the risk of proliferation of living areas in Kakadu. The draft plan notes that this proliferation should not be just a matter for consideration by the Board and the Director and has granted some rights for comment and review through environmental assessment under Category 3 actions. The other development actions in the plan should also be subject to public comment and review processes.	Amended by adding Section 9.5.6 to review the Environmental Impact Assessment guidelines for assessment of proposals. A review of the guidelines will include consideration of the need to seek public comment on certain classes of proposals, such as those which have more than a negligible impact to park values and are likely to be of public interest.

Plan reference	Comments in the submission	Response
Colong Foundation for Wilderness		
Section 3. General provisions and IUCN category	<p>The Colong Foundation considers there should be no development in national parks, but if there is to be development imposed upon a park, then a statutory (Black Letter) planning system, as opposed to a flexible strategic planning system, must regulate it. The citizens of Australia must be able to have certainty on the range and location of development permitted by the draft plan.</p>	<p>The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan. The Board considers that IUCN Category II National Park is not inconsistent with the management of activities in the park.</p> <p>In response to the comments received on zoning the Board agreed to include in the management plan background information on the guidelines that the IUCN provides for assigning protected areas to zones, and clarification regarding the Australian IUCN management principles.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan, and the Guidelines for EIA in place under the plan are used to protect natural and cultural values.</p> <p>In response to this comment, and other comments on the EIA process outlined in section 9.5 of the plan the following action has been inserted into Section 9.5:</p> <p>Action:</p> <p>9.5.6 As a matter of priority, review the Environmental Impact Assessment guidelines for assessment of proposals to ensure adequate protection of the park’s values. A review of the guidelines will include consideration of the need to seek public comment on certain classes of proposals, such as those which have more than a negligible impact to park values and are likely to be of public interest.</p>

Plan reference	Comments in the submission	Response
Colong Foundation for Wilderness		
Section 9.05 Assessment of proposals	<p>We request that you amend the sixth Kakadu National Park plan of management so that it contains:</p> <ul style="list-style-type: none"> • A schedule of all development proposals indicated on a separate map and summarised in the text, with provisions to ensure that all these proposals are placed on public exhibition and subject to public comment and review, (not just category three proposed actions that will be subject to environmental impact statement processes); <p>Submissions page reference: 1</p>	<p>Amended the plan to include a new action (9.5.6) to review the Environmental Impact Assessment guidelines for assessment of proposals as a matter of priority.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan, and the Guidelines for EIA in place under the plan are used to protect natural and cultural values. A review of the guidelines will include consideration of the need to seek public comment on certain classes of proposals, such as those which have more than a negligible impact to park values and are likely to be of public interest.</p>
Section 9.05 Assessment of proposals	<p>The plan of management for any national park should not simply refer all development and use decisions to Board members without, at the very least, setting out public review procedures within a strong framework of nature-based prescriptions that regulate development and use. Draft plan six fails to do this, just listing a ‘cookbook’ for impact assessment of proposed actions, as if Kakadu were just any piece of ordinary land and not a World Heritage listed national park.</p>	<p>Amended the plan to include a new action (9.5.6) to review the Environmental Impact Assessment guidelines for assessment of proposals as a matter of priority.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan, and the Guidelines for EIA in place under the plan are used to protect natural and cultural values. A review of the guidelines will include consideration of the need to seek public comment on certain classes of proposals, such as those which have more than a negligible impact to park values and are likely to be of public interest.</p>

Plan reference	Comments in the submission	Response
Colong Foundation for Wilderness		
Section 9.05 Assessment of proposals	Under the proposed plan, the Board of Kakadu National Park can, for example, permit commercial 4WD tours or the construction of luxury camps and lodges in the current wilderness zone, without adequate public comment and review, as these actions are not category 3 actions.	<p>Amended the plan to include a new action (9.5.6) to review the Environmental Impact Assessment guidelines for assessment of proposals as a matter of priority.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan, and the Guidelines for EIA in place under the plan are used to protect natural and cultural values. A review of the guidelines will include consideration of the need to seek public comment on certain classes of proposals, such as those which have more than a negligible impact to park values and are likely to be of public interest.</p>
Section 9.05 Assessment of proposals	Flexible and discretionary development controls (i.e. described under this draft plan as adaptive management) are not acceptable for town planning, and will prove extremely detrimental to park management for the preservation of heritage values. The current administrative framework is toxic to mutual understanding by the Indigenous Bininj/Mungguy and Balanda. It is the people’s national park and they want it protected, under their lease. All Australians have a right to say how the park is regulated to ensure that protection. The development control arrangements proposed in the draft plan will one day fail Kakadu and will be exposed for what they are – a regime to facilitate park development.	<p>Amended the plan to include a new action (9.5.6) to review the Environmental Impact Assessment guidelines for assessment of proposals as a matter of priority.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan, and the Guidelines for EIA in place under the plan are used to protect natural and cultural values. A review of the guidelines will include consideration of the need to seek public comment on certain classes of proposals, such as those which have more than a negligible impact to park values and are likely to be of public interest.</p>

Appendix B – Public comments that did not result in changes to the management plan

Plan reference	Comments in the submissions	Response
Four Wheel Drive Northern Territory – 4WD Club		
Section 1.4 Park values and local, regional, national and international significance	b. How Kakadu is significant nationally - why is recreation not mentioned? There is a distinction made in the previous section between tourism (presumably commercial) and recreation - why not here?	No change to the plan necessary. Kakadu is significant regionally for recreation purposes because many people from Darwin and Katherine use the park for fishing, camping and bushwalking. In the national context, the park is a major tourism attraction for domestic and overseas visitors who come to view rock art and the natural landscapes.
Section 1.4 Park values and local, regional, national and international significance	The Values Statement is very comprehensive; however we note one important area in which it needs to be supplemented. One of the two purposes of establishing the park was for the encouragement and appropriate use, appreciation and enjoyment of the area by the public. The values statement and the policies and actions that cascade down from it, don't reflect this emphasis on the public use and enjoyment. Whilst it may be implicit, the lack of explicit focus on this purpose is then diluted by the many other elements of the vision that are afforded explicit treatment.	No change to the plan. The Board recognises the purposes for which the park was declared, including appropriate use, and is keen to develop tourism in the park and make Kakadu an exciting destination for visitors. In developing values statements for Commonwealth reserves there has been a conscious decision to only include those values that are in situ, the values that people come to see, the values that we strive to conserve and manage appropriately. From this, we then consider how these values are utilised, through tourism, through research, through recreational and commercial activities. The natural and cultural values of the park are valuable for tourism, recreation and science. Tourism and use of the park is appropriately addressed in the plan.
Section 1.4 Park values and local, regional, national and international significance	The public access and enjoyment need to be explicitly in the values statement to reflect its significance, and then this also needs to cascade down through the principles, policies and actions in the plan. Even though the plan is in the order of 250 pages long, this lack of emphasis in the Values Statement, leads to the primary explicit treatment of public recreational use only comprising about four pages of the plan – and in this there is no distinction drawn between non-commercial and commercial use and access. This is despite the fact the independent visitors constitute 2/3 of the visitors to the park. We believe this is a significant omission that needs to be addressed.	No change to the plan. The Management Plan for the park is an enabling document. It allows activities to occur that would otherwise be restricted by the EPBC Act and Regulations. It is not necessary to describe each type of visitor to the park unless there are restrictions or special provisions in the EPBC legislation that need to be addressed. Relevant tourism strategies and programmes for the park will address the special needs of visitors.

Plan reference	Comments in the submissions	Response
Four Wheel Drive Northern Territory – 4WD Club		
Section 1.4 Park values and local, regional, national and international significance	1.4 How Kakadu is significant regionally – Conservation a. The statement “Kakadu is important for conservation in the region because it is a large area managed as a national park, whereas other areas of Top End habitats are managed primarily for purposes such as pastoralism, mining, or defence force use.” Omits mention of the very significant aboriginal land holdings in the region	No change to the plan. The statement in the plan is about types of land use in the region. This is different from land tenure which is what is being suggested by the comment.
Section 2.2 Management plan framework	We note that the management plan uses the park values statement to establish the policies and actions needed to protect, present and understand the values of the park, with principles which apply to the management of all aspects of that section and then detailed policies and actions relating to particular issues. We note that the purpose for establishing the park was - the preservation of the area in its natural condition. - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public.	No change to the plan. Statement only.
Section 5.1 Looking after culture	5.1.14 d - It might be helpful to broaden this to include any areas where people may access or be likely to access?	No change to the plan. This matter is covered by the park compliance and enforcement strategy (Action 9.2.2) which includes actions to help address unauthorised access to areas in the park and installation of signage to indicate restricted areas (Action 5.1.15c).
Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion	Part C Managing Kakadu: needs an explicit section to address non-commercial recreation as per comments above. This is not the same as commercial tourism and so not adequately articulated currently in the plan. The current content does not adequately reflect one of the purposes for which the park was formed which was: “the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public”. A good example is Figure 13 which does not reflect non-commercial use, but does address commercial opportunities.	No change to the plan. The Management Plan for the park is an enabling document. It allows activities to occur that would otherwise be restricted by the EPBC Act and Regulations. The range of traveller types to the park is identified in Section 6.1 but it is not necessary to describe these in more detail unless there are restrictions or special provisions in the EPBC legislation that need to be addressed. The Tourism Master Plan (Action 6.1.6) will consider the specific needs of the range of traveller types to the park, including independent travellers.

Plan reference	Comments in the submissions	Response
Four Wheel Drive Northern Territory – 4WD Club		
Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion	This lack of distinction between commercial and non-commercial visitation is further confused by the use of the word “tourism”. The word appears on many occasions to refer to commercial tourism (e.g. tourism industry), but on other occasions a broader use to include non-commercial visitors appears to be implied.	<p>No change to the plan.</p> <p>Covered by Section 6.2 that specifically relates to commercial tourism in the park. Section 6 of the plan relates to tourism in general and is not limited to Commercial or non-commercial tourism within the park.</p> <p>The term "tourism" in the plan refers the practice of travelling (touring) for recreation, the provision of experiences that are appreciated by visitors (tourists) in the park and the guidance or management of visitors in the park.</p>
Section 6.1 Destination and visitor experience development	In addition to being explicitly mentioned in the relevant part of the plan and principles and policies, there needs to be an additional section, or significant further elaboration of an existing section [re purpose of park - public access and enjoyment], which explicitly deals with this.	<p>No change to the plan.</p> <p>Public access and enjoyment are covered in Section 6 and specifically Section 6.1 which provides for visitor experience planning for a range of traveller types.</p>
Section 6.1 Destination and visitor experience development	Another area which we would like to see the plan strengthen is in identifying the essence of what makes Kakadu special to the public and therefore needs to be preserved. The plan is well developed in relation to Binji and conservation, but not explicitly in relation to recreational users. Among the attractions to visitors is the isolation and natural beauty of the park. The plan doesn't draw out what are the elements of this which are important to preserve except by saying that a goal of the establishment of the park was the preservation of the area in its natural condition. Without some definition of the essence that needs to be preserved to maintain the essential character and attraction of Kakadu, there is insufficient guidance provided by the plan to inform the management of the park about these things over the life of the plan. We believe it is important that the plan better articulates more of the essential essence that must be preserved in maintenance, upgrades and development of the park so that unguided maintenance doesn't, through time, dilute important elements of visitor's experiences.	<p>No change to the plan.</p> <p>The in-situ values of the park for visitors to experience are articulated in the values statement and throughout the plan.</p> <p>There are a range of mechanisms to further describe and maintain the essential essence of the park including the Shared Vision for Tourism, the Tourism Master Plan (Action 6.1.6) and Visitor Experience plans for each precinct (Action 6.1.7). In addition there are other strategies that go into further detail such as the Cultural Heritage Strategy and the Walking Strategy. Each of these documents picks up on and supports or recommends the relevant actions to maintain that essential essence through protection of the park values.</p>

Plan reference	Comments in the submissions	Response
Four Wheel Drive Northern Territory – 4WD Club		
Section 6.1 Destination and visitor experience development	Kakadu as a visitor experience destination, commercial tourism and promotion. In the objectives, vision etc, it doesn't articulate what is significant to preserve in terms of experience other than varied and enriching experiences as per comments above	No change to the plan. The in-situ values of the park for visitors to experience are articulated in the values statement and throughout the plan. There are a range of mechanisms to further describe and maintain the essential essence of the park including the Shared Vision for Tourism, the Tourism Master Plan (Action 6.1.6) and Visitor Experience plans for each precinct (Action 6.1.7). In addition there are other strategies that go into further detail such as the Cultural Heritage Strategy and the Walking Strategy. Each of these documents picks up on and supports or recommends the relevant actions to maintain that essential essence through protection of the park values.
Section 6.1 Destination and visitor experience development	ABS statistics show that the sales of SUV's have trebled since 2000 illustrating the huge rise in the popularity of these vehicles in recent years. With the focus of the federal and territory governments on developing the north of Australia, we can expect a significant decrease in land available for recreational four wheel driving as land use changes. However, there have been no new four wheel drive opportunities opened in Kakadu in recent years. Instead road and track standards keep improving to the degree that some areas such as Maguk, which are still nominated as four wheel drive access, can now generally be accessed by a normal car.	No change to the plan. Covered by the Tourism Master Plan (Action 6.1.6) and via precinct planning (Action 6.1.7) which will consider 4WD touring, opportunities and experiences.
Section 6.1 Destination and visitor experience development	Even though it may seem that four wheel driving is synonymous with Kakadu, there are many people who visit Kakadu without a 4WD vehicle or trip. itineraries. Ubirr, Nourlangie and Yellow Water for example is wholly 2WD. Without specific focus and discussion on the role of the 4WD experience to visitors to Kakadu, the value of this may be eroded over time if it is not necessarily being given a deliberate strategy or adequately considered.	No change to the plan. Covered by the Tourism Master Plan (Action 6.1.6) and via precinct planning (Action 6.1.7) which will consider 4WD touring, opportunities and experiences.

Plan reference	Comments in the submissions	Response
Four Wheel Drive Northern Territory – 4WD Club		
Section 6.1 Destination and visitor experience development	There is a great opportunity for Kakadu to develop additional four wheel driving opportunities which are consistent with its guiding principles. One opportunity could be an iconic trip from Manyallaluk through Sleisbeck and Gimbat. This could even be promoted as an iconic route right through to the northern coast at West Alligator Head. Opening the old track from Manyallaluk into the south of the park would be a fantastic trip which would be very attractive to many four wheel drivers and open up a currently inaccessible part of the park. This new entry would have the potential to draw tourists into the south of the park and be consistent in trying to encourage an increase in visitation to that area. We understand that challenges relating to sickness country exist on this route but encourage the consideration of whether this opportunity could be developed.	No change to the plan. Covered by the Tourism Master Plan (Action 6.1.6) and via precinct planning (Action 6.1.7) which will consider 4WD touring, opportunities and experiences.
Section 6.1 Destination and visitor experience development	Opportunities could also be explored for access into other areas of the park which provide a four wheel drive experience through areas with minimal facilities.	No change to the plan. Covered by the Tourism Master Plan (Action 6.1.6) and via precinct planning (Action 6.1.7) which will consider 4WD touring, opportunities and experiences.
Section 6.1 Destination and visitor experience development	6.1 We would like to see a section added here about new and increased 4wd opportunities	No change to the plan. Covered by the Tourism Master Plan (Action 6.1.6) and via precinct planning (Action 6.1.7) which will consider 4WD touring, opportunities and experiences.
Section 6.1 Destination and visitor experience development	The plan does not acknowledge the importance of swimming to the public in such a hot region. This should be developed further.	No change to the plan. Covered by Section 6.1 that identifies swimming as a visitor experience.
Section 6.1 Destination and visitor experience development	6.1.10 Walking strategy – there is currently little published information on bushwalking in Kakadu yet it is a very popular activity. We understand there is reluctance amongst some of the Binji relating to publishing some of the routes, however the complete silence on this issue leads to impressions of secrecy. If specific things can't be published, then the public need to be informed about this and why. As almost no information on walks is currently published, it makes it very difficult for the public to understand enough about the walks available.	No change to the plan. Covered by Actions 6.1.7 and 6.1.10 where opportunities for more walking routes throughout the park will be considered in the walking strategy and through the precinct planning process. Unsupported bushwalks in the park present a high level of risk to visitor safety and require a high level of experience. For these reasons overnight bushwalks are not promoted on the park website, however, interested walkers can make enquiries at the park.

Plan reference	Comments in the submissions	Response
Four Wheel Drive Northern Territory – 4WD Club		
Section 6.1 Destination and visitor experience development	[“Park management will aim to ensure that public areas are open to visitors for as long as possible each year.”] This is a prime issue for recreational users of the park and is an example of the type of issue that would be valuable to develop further in this plan.	No change to the plan. Covered by Action 6.1.17 and further considered and addressed in the Tourism Master Plan (Action 6.1.6).
Section 6.1 Destination and visitor experience development	6.1.18 “Consider implementing staged opening of sites over the shoulder season and providing exclusive use or access to sites.” The issue of seasonal access and opening times could be further developed in the plan given its significance. In terms of exclusive access, we do not support commercial operators being given exclusive access to some parts of the park. This is a National Park which was established for the public and it should not evolve to be only accessible for those who have enough money to experience some areas. We would support exclusive access for non-commercial groups who have demonstrated responsible behaviour.	No change to the plan. Action 6.1.18 does not specify that exclusive access will be provided to commercial operators or any other specific group.
Section 6.4 Visitor information	Communication Opportunities Communication – there is an opportunity to further develop communication with the public. Communication is currently directed at the commercial tourist industry (such as through the industry update) but the same focus does not apply to the public.	No change to the plan. Covered by Action 6.4.4 Continue to provide up-to-date information to visitors using a variety of means, including social media, the website, the tourism industry, visitor information providers, visitor guides and park notes.
Section 6.4 Visitor information	Currently there are a number of areas in Kakadu that should only be access by 4WD. Each of these routes have different characteristics, levels of difficulty and vehicle requirements. This makes it difficult for visitors to know what to expect from each route, and what vehicle and skill level is needed for the different routes. This isn’t helped by the road to Maguk which is sign posted as 4WD only, but often accessible by normal vehicle nor by the enormous growth in types of 4WD vehicles in popular use – including ‘soft roaders’. We suggest it would be helpful for visitors to be provided with clearer information on what they can expect and clearer information on what vehicles are suitable.	No change to the plan. Comments noted. This matter is covered by the Tourism Master Plan (Action 6.1.6) which includes a recommendation to develop both a web page and park note addressing 4WD opportunities in the park. Also covered by Action 9.4.11 develop and implement a road management strategy for the park.

Plan reference	Comments in the submissions	Response
Four Wheel Drive Northern Territory – 4WD Club		
Section 6.4 Visitor information	We would like to see objectives in the plan to improve communication with the public in these areas [e.g. clearer information on what visitors can expect in terms of road types and clearer information on what vehicles are suitable].	No change to the plan. This matter is covered by the Tourism Master Plan (Action 6.1.6) which includes a recommendation to develop both a web page and park note addressing 4WD opportunities in the park. Also covered by Action 9.4.11 develop and implement a road management strategy for the park.
Section 6.4 Visitor information	It would be great to make some information easier to obtain. e.g. to fill out a permit for Graveside Gorge you need to provide information including a map showing where you will camp – however until you have been there, how can you know where to camp without being provided information on suitable locations if you haven't been there before? It's a chicken and an egg situation that makes it unnecessarily hard for people.	No change to the plan. This issue will be addressed as part of the Walking Strategy under development (6.1.10).
Section 6.4 Visitor information	The web site (even though it has been redeveloped) makes it harder than it should to find information e.g. if someone wants to find information on a particular site, it not a very direct route to the information.	No change to the plan. This issue will be considered as part of the Interpretation Strategy being developed (6.4.3).
Section 6.4 Visitor information	There is no specific information on bushwalking available on the web site. Even though there is sensitivity amongst the Bininj for publicising some routes, better communication would be great so that the public have more opportunity to learn about the bushwalking possibilities in the park, what they offer, and how to access them. Where there are limits on the information that can be provided, it would be great to see this more clearly articulated so the public understand.	No change to the plan. This issue will be addressed as part of the Walking Strategy under development (6.1.10), which includes a commitment to improving communication about bushwalking opportunities in the park.
Section 6.4 Visitor information	Information on projected opening times is very valuable for the public to plan visits early in the dry season. Publication of historical and projected opening times would be most useful.	No change to the plan. The management plan includes a specific action on providing up to date information to visitors (6.4.4) and using best endeavours to ensure that public areas are open for as long as possible, particularly early in each year (6.1.17).
Section 8.2 Jabiru	8.2.10 Re Jabiru management: "The Director will only approve or proceed with a proposed action if it will provide more benefits than costs to the natural and cultural environment of the park, to Bininj/Mungguy, and to the appropriate use, appreciation and enjoyment of the park by the public." This is a great objective. This objective should be at the top of objectives for the whole park and not just relate to Jabiru.	No change to the plan. Supportive comment.

Plan reference	Comments in the submissions	Response
Four Wheel Drive Northern Territory – 4WD Club		
Section 9.01 Safety and incident management	<p>9.1 Safety and incident management</p> <ul style="list-style-type: none"> o “In a remote national park covering a large geographic area, response times to incidents can be lengthy due to difficult terrain, communications and mobilization of experienced and equipped staff. Mobile phone coverage in the park is limited and needs to be improved.” and “9.1.12 Work with government and non-government agencies and other stakeholders to improve mobile phone coverage in the park.” <p>Both these statements support increase mobile coverage in the park. However the remoteness is one of the allures of Kakadu. See previous comments about what makes Kakadu special and maintain the essence of why it’s there. We understand the pervasive role that digital technology plays in our worlds and particularly in the sharing of visitor experiences. We would like to see further development of the locations where experiences and areas of the park, will be maintained as isolated and without facilities such as mobile phone coverage. There are lots of ways to manage safety, and this has been done very well without mobiles for many years.</p> <p>We encourage further development of this issue to further explore and acknowledge the benefits and implications of mobile phone coverage, and how assessment will be made of where remote experiences should be preserved from mobile coverage.</p>	<p>No change to the plan. This matter is covered by Section 6.1 which includes the tourism master planning and precinct planning processes. These processes will identify locations where experiences and areas of the park will be maintained as isolated and remote. Any measures to improve mobile phone coverage will be subject to the Environmental Impact Assessment process outlined in section 9.5, which aims to protect the highly significant cultural and natural values of the park, and consultation with traditional owners and approval of the Board.</p>
Section 9.03 Authorising and managing activities	<p>It would be great to see improvements to make it easier to obtain permits e.g. simpler ways to obtain available dates for permitted areas. Currently needing to make phone enquiries with permit staff is not very efficient for permit seekers or staff. Also the very extensive permit conditions and the requirement to sign legal deeds is quite bamboozling for the average member of the public who just want to go camping – particularly coupled with the several other documents issued with them. It would be desirable to see this more user friendly.</p>	<p>No change to the plan. The permit system will remain an ongoing requirement under the current legislation to allow a range of activities to be conducted within the Park. It exists as a mechanism to allow individuals, organisations and businesses to utilise the resources of the Park without undermining the values of the reserve.</p> <p>Under Action 9.3.4 the park is committed to reviewing and, where possible, improving systems for the processing, administration and management of permits.</p>

Plan reference	Comments in the submissions	Response
Four Wheel Drive Northern Territory – 4WD Club		
Section 9.07 Neighbours, stakeholders and partnerships	<p>In regards to the credentials of 4WD NT, we have an MOU agreement with NT Parks and Wildlife to enable our member clubs to actively participate in the opening of old disused tracks within the Northern parks and assist in the opening of public 4WD tracks each year after the wet season.</p> <p>We are also being contracted to survey a 4WD route in the East Kimberly region of WA for the Indigenous land Corporation Perth Office. The purpose of the route is for Tourism.</p>	<p>No change to the plan. Commentary only.</p> <p>The Director acknowledges the credentials of 4WD NT and looks forward to further developing a relationship with them over life of the 6th plan. This has begun already with 4WD NT taking up a position on the Kakadu Tourism Consultative Committee.</p>
Section 9.07 Neighbours, stakeholders and partnerships	4WD NT represents the views of a large stake holder group for the Kakadu area. We are available and keen to provide consultation and advice to Park management as and when considered appropriate.	<p>No change to the plan.</p> <p>The Director acknowledges the credentials of 4WD NT and looks forward to further developing a relationship with them over life of the 6th plan. This has begun already with 4WD NT taking up a position on the Kakadu Tourism Consultative Committee.</p>
General comment	<p>This lack of emphasis on the public was also reflected in the stakeholder engagement process for this plan. Unlike other key stakeholder groups, there was no structured consultation with the public during the development of the plan or the public review period.</p> <p>We would encourage an increased focus on the public to convey the message that they are a priority for Kakadu.</p>	<p>No change to the plan. The public were invited to submit comments towards the development of the draft management plan on 29 February 2012. All of the comments received through that consultation period were considered in the development of the management plan.</p> <p>Under the EPBC Act only 30 days must be provided for public consultation on management plans. However in recognition of the high level of public interest in the Kakadu management plan the Board opted to make the plan available for public comment for over 70 days. The public consultation period on the draft management plan ran from 3 December 2014 to 14 February 2015, providing 73 days for the public to comment on the plan.</p>
General comment	In the Fact Sheet on the Management Plan it says “Park management will aim to ensure that public areas are open to visitors for as long as possible each year.” (Action 6.1.16) (It actually refers to 6.1.17)	No change to the plan. The suggested edit relates to the factsheets supporting the draft plan and are acknowledged. They will be considered when the factsheets are revised upon finalisation of the plan.

Plan reference	Comments in the submissions	Response
Aboriginal Areas Protection Authority		
Section 5.1 Looking after culture	The AAPA looks forward to exploring, addressing and enhancing its relationship and partnership with Kakadu National Park under the 6th Plan of Management. We are happy to make ourselves available to discuss any aspect of this submission.	No change to the plan. The Director acknowledges this offer of support which will be considered during the life of the plan.
Section 5.1 Looking after culture	(b) Parks staff need to be aware that many high-use areas of the Park are sacred sites or have sacred sites nearby, and that management activities at these areas need to be cognisant of the NTASSA (exemplified by the Gunlom tree incident in May 2013);	No change to the plan. Action 4.2.10 In consultation with NLC, review cultural protocol documents (including Sickness Country protocols and Indigenous research protocols), and consolidate where possible to ensure decision-making and other activities on the ground are guided by appropriate protocols and in a consistent manner.
Section 6.1 Destination and visitor experience development	6.1.10 notes the bushwalking strategy, AAPA considers that it has a critical role to offer in the development of this strategy to ensure that sacred sites are avoided or accessed in a ways considered appropriate for Bininj/Munggyu.	No change to the plan. The draft walking strategy was developed in consultation with a steering committee and other key stakeholders and was released for public comment early in 2015.
Section 7.1 Research and knowledge management	7.1 of the Draft Plan details research priorities and knowledge gaps with the stated policy at that Park management is based upon the best available evidence. AAPA is concerned that neither the Kakadu Board of Management or the Kakadu Research Advisory Committee (KRAC) have any form of communication with AAPA. We consider this problematic on two levels: (a) Research projects and activities may be approved which could facilitate entry or work on sacred sites within Kakadu; and (b) Research projects conducted or fostered by AAPA aimed at recording and registering sacred sites, and thereby targeting knowledge (and management) gaps, as well as contributing to the maintenance and intergenerational transmission of cultural knowledge, are not being considered.	No change to the plan. Kakadu National Park has stringent processes in place to manage the areas accessed by researchers working in the park. The plan contains provisions for working in partnership and collaborations in undertaking research and monitoring activities in Kakadu National Park (Policy 7.1.4).
Aboriginal Areas Protection Authority		
Section 7.1 Research and knowledge management	AAPA considers that Policies 7.1.1 and 7.1.4 (along with other comment in this submission) demonstrate a need to enhance the relationship with AAPA so that appropriate sacred site research and management advice in Kakadu can be funded and undertaken.	No change to the plan. The need to enhance the relationship with AAPA is recognised in sections 4 and 5 of the management plan.

Plan reference	Comments in the submissions	Response
Amateur Fishermen's Association of the Northern Territory		
Section 5.3 Managing park wide threats	AFANT strongly supports recreational fishing practices that are low impact, sustainable and ensure a high quality experience whilst protecting the special natural assets of the Kakadu NP. We would be the first organisation to support or recommend measures to address actual identified impacts or sustainability concerns.	No change to the plan. Comment noted.
Section 5.3 Managing park wide threats	In regards to research into the impact of fishing pressure and boat traffic on bank erosion (5.3.40) AFANT believes that Kakadu NP has had the opportunity to conduct research into these issues more so than other areas of the Northern Territory with a number of areas off limits to recreational fishing and boating but we are surprised that this has not been undertaken when this was the justification for the closure of rivers like the west alligator.	No change to the plan. Comment noted. Action 5.3.42 commits to monitoring the impacts of recreational fishing in the park which will inform the review of recreational fishing prescribed in Action 6.1.11. These actions are a priority in the sixth plan.
Section 5.3 Managing park wide threats	While the draft plan does not specify access or restricted areas for recreational fishing other than the current areas that remain open the draft does make a number of negative comments regarding concern with fishing pressure and number of boats. AFANT notes that these comments are not based on any scientific research or justification which is a concern.	No change to the plan. Statements about fishing pressure and number of boats are based on observations during compliance activities, visitor comments and concerns raised by Bininj in consultations during the preparation of this plan.
Section 6.1 Destination and visitor experience development	AFANT also has concerns regarding the comments within the draft plan regarding recommending recreational fishers avoid areas such as bird rookeries on the East Alligator and South Alligator rivers.	No change to the plan. Covered by Action 6.1.12 that confirms recreational fishers in the park will continue to be encouraged not to disturb bird rookeries. This approach ensures that surrounding areas remain open for fishing.
Section 7.1 Research and knowledge management	AFANT would also like to offer our members services as volunteers for fisheries tagging or catch and effort data collection, this is research which we currently undertake in a number of river systems across the Northern Territory and we believe targeted research in Kakadu could provide valuable information to parks management on the state of fish stocks.	No change to the plan. The plan contains provisions for working in partnership and collaborations in undertaking research and monitoring activities in Kakadu National Park (Policy 7.1.4).
Section 10.7 Recreational activities	AFANT would like to work with traditional owners and park managers in the process of reopening the waters that were closed on the basis of the now non-existent risk of salvinia spread.	No change to the plan. This issue will be considered under the review of fishing and boating in the park (Action 6.1.11) and policies 4.1.4 and 9.7.3 which provide for consultation with stakeholders where their interests are likely to be affected.

Plan reference	Comments in the submissions	Response
Amateur Fishermen's Association of the Northern Territory		
Section 10.7 Recreational activities	AFANT believes that the following areas should be considered for improving access: <ul style="list-style-type: none"> • Island billabong • Jabaluka billabong • Ja Ja billabong • Magela billabongs south of the Oenpelli Road • Nourlangie River below Anbangbang billabong • Extension of the access at the top of the South Alligator River to take in the 2km above the current closure • Jim Jim upstream of the communities • West Alligator River 	No change to the plan. This issue will be considered during the review of fishing and boating in the park (Action 6.1.11).
Section 10.7 Recreational activities	AFANT would also like clarification on the purpose of the provisions that allow the implementation of a licence system in the park.	No change to the plan. Provisions in 10.7.17 that allow the implementation of a licence system give the Board flexibility to introduce one if needed. This is the same provision that was in the fifth plan.
Section 10.7 Recreational activities	AFANT supports the review of areas within the park and would welcome the opportunity to be involved as a key stakeholder. We believe that some of the areas that are currently closed on the east of the Kakadu highway could be opened up to land based lure and fly only catch and release fishing, with negligible impact on the fish stocks. Exclusions could be put into place around swimming areas or high tourist areas.	No change to the plan. This issue will be considered during the review of fishing and boating in the park (Action 6.1.11) and in accordance policies 4.1.4 and 9.7.3 which provide for consultation with stakeholders where their interests are likely to be affected.
Section 10.7 Recreational activities	AFANT has identified a number of billabongs and areas that are currently closed or without access that with the implementation of reasonable management arrangements, could be reopened to recreational angling whilst still protecting the values and principles of the national park.	No change to the plan. This issue will be considered during the review of fishing and boating in the park (Action 6.1.11).

Plan reference	Comments in the submissions	Response
Amateur Fishermen's Association of the Northern Territory		
Section 10.7 Recreational activities	AFANT believes that the current areas that are closed in the park are not clearly defined or explained and justified and AFANT believes that clearer maps and information for recreational anglers is required.	No change to the plan. This issue will be considered during the review of fishing and boating in the park (Action 6.1.11). Maps indicating where recreational fishing is presently allowed are available to members of the public on the website and in park notes. The plan states that determinations in effect at commencement of the plan that relate to recreational fishing (including areas closed) will continue to apply unless varied by a future determination. This gives the Board flexibility to review the areas where people can fish and boat during the life of the .plan.
Section 10.7 Recreational activities	AFANT would like clarification on the ability of the Director to change rules in the park (10.7.15) and what consultation agreement and process will be undertaken before any change which may impact on recreational fishing and boating access or operation.	No change to the plan. This comment is seeking clarification only. Policy 10.7.15 gives the Director the ability to prohibit or regulate the use of vessels in the park. This gives the Board flexibility to prohibit or regulate the use of vessels during the life of the plan if needed. Consultation processes for any changes in park rules that may impact on stakeholders are comprehensive and clearly identified in Section 4.1.4
Section 10.7 Recreational activities	While we accept the need for flexibility within the plan over its lifetime and the ability of parks management to make required changes based on unforeseen issues, AFANT has real concerns with some clauses in the draft that could have a negative impact on recreational fishing within the Kakadu national park.	No change to the plan. Statement only. The Board needs flexibility over the life of the plan to make changes based on unforeseen issues. This issue will be considered in the review of fishing and boating in the park (Action 6.1.11). Consultation processes for any changes in park rules that may impact on stakeholders are comprehensive and clearly identified in Section 4.1.4.
Section 10.7 Recreational activities	A number of provisions within the plan which would seem to allow the director to make significant changes to boating or fishing in the park with limited consultation are a real concern.	No change to the plan. Statement only. Consultation processes for any changes in park rules that may impact on stakeholders are comprehensive and clearly identified in Section 4.1.4.
Section 10.7 Recreational activities	AFANT also questions the provisions to allow the carriage of mud crab pots through the park for their legitimate use outside the park boundary's without a similar provision to allow the carriage of a legal catch of mud crabs	No change to the plan. The plan clearly states that crabs cannot be lawfully taken within the park, but fish can. If someone is transporting crabs through the park it is impossible to determine if the crabs were caught in the park or outside the boundaries of the park. To assist in compliance activities within the park, it is necessary to prohibit the transit of crab catch into/through the park.

Plan reference	Comments in the submissions	Response
Amateur Fishermen's Association of the Northern Territory		
Section 10.7 Recreational activities	We would welcome the opportunity to provide additional information or to discuss any of the issues raised in this submission.	No change to the plan. Statement only.
Section 10.7 Recreational activities	AFANT welcomes the opportunity to comment on the draft plan of management for Kakadu National Park.	No change to the plan. Statement only.
Section 10.7 Recreational activities	The rivers and billabongs in Kakadu are some of the most important areas for recreational fishing in the Northern Territory and as such AFANT has a strong interest in ensuring the best outcomes for recreational fishing are delivered in the management plan.	No change to the plan. Statement .only. Consultation processes for any changes in park rules that may impact on stakeholders are comprehensive and clearly identified in Section 4.1.4.
Section 10.7 Recreational activities	The recreational fishing sector has some significant areas of Kakadu that are off limits, we are strongly of the view that management of access not exclusion of recreational fishing from areas will deliver the best benefit not just for the recreational fishing but also the future visitation, management, public standing and use of the park.	No change to the plan. This issue will be considered under the review of fishing and boating in the park (Action 6.1.11).
Section 10.7 Recreational activities	Like many areas across the Territory, Kakadu NP has seen an increase in fishing effort. This is predominantly managed in the NT with possession limits. With the exception of reef fish species like snapper and jewfish, the sustainability of fish stocks in the NT is very good and the current possession limits of fish like barramundi are sufficient to manage the stocks and leave a significant buffer to ensure quality fishing is available into the future.	No change to the plan. Statement only.
Section 10.7 Recreational activities	AFANT is strongly of the view that spreading the recreational fishing effort through improvements to accessible areas has the potential to improve the Kakadu recreational fishing experience and reducing any real or perceived fishing pressure concerns.	No change to the plan. This issue will be considered under the review of fishing and boating in the park (Action 6.1.11). The management plan does not set the restrictions for fishing and boating access in the park.
Section 10.7 Recreational activities	AFANT has concerns that areas closed to recreational fishing/boating due to salvinia which was first detected in the Magela catchment in 1983 have remained closed in the park, although it is acknowledged that salvinia has since still spread through a range of areas where it was not previously present and that the transfer or spread was most likely due to water birds or other vectors.	No change to the plan. This issue will be considered under the review of fishing and boating in the park (Action 6.1.11). The spread of salvinia within the park remains a significant concern and there is a high likelihood of increased spread through boat infestation and turbulence.

Plan reference	Comments in the submissions	Response
Amateur Fishermen's Association of the Northern Territory		
Section 10.7 Recreational activities	The justification for closures of fishing areas to prevent salvinia spread was based on the perceived risk of boats and trailers spreading the weed. While we acknowledge that salvinia can be spread by vessels, it is currently established in all waters open to recreational fishing vessels as well as a number of closed waterways and this spread has not been attributed to boat trailers.	No change to the plan. This issue will be considered under the review of fishing and boating in the park (Action 6.1.11). The spread of salvinia within the park remains a significant concern and there is a high likelihood of increased spread through boat movement and turbulence.
Section 10.7 Recreational activities	The proposal in the draft plan for the reduction in the possession limit of barramundi from 5 to 3 (10.7.17) in Kakadu, while not based on current sustainability concerns, is supported by AFANT as a prudent management tool change to ensure the protection of the barramundi stocks. AFANT believes that this change will add value to the Kakadu barramundi fishery whilst still allowing anglers to retain a reasonable number of fish for the table.	No change to the plan. Supportive comment
Blue Mountains Conservation Society		
Section 3. General provisions and IUCN category	In particular, the Society strongly believes that the 6th PoM should be amended to include: a zoning table and maps to protect its heritage values, particularly those of wilderness, from the adverse impacts of visitor facilities;	No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan. The category to which the park is assigned is guided by the purposes for which the park was declared. The Environmental Reform (Consequential Provisions) Act 1999 deems the park to have been declared for the following purposes: - the preservation of the area in its natural condition - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. This is equivalent to IUCN category II - National Park. The environmental impact assessment (EIA) process outlined in section 9.5 of the plan are rigorous, and the Guidelines for EIA (2008) in place under the plan ensures protection of natural and cultural values.
Section 9.05 Assessment of proposals	In particular, the Society strongly believes that the 6th dPoM should be amended to include: prohibition of new visitor accommodation and roads;	No change to the plan. The Board does not support the prohibition of new visitor accommodation and roads but proposed new accommodation or roads are assessed in accordance with the environmental impact assessment (EIA) process outlined in section 9.5.

Plan reference	Comments in the submissions	Response
Bushwalking Australia		
Section 1.1 A description of Kakadu National Park	Bushwalking Australia endorses the description of Kakadu National Park and the Values Statement.	No change to the management plan necessary. Supportive comment.
Section 4.1 Making decisions and working together (Board of Management)	Bushwalking Australia (BA) supports joint management of Kakadu in cooperation between the traditional owners and the Australian National Parks Service.	No change to the plan. Supportive comment.
Section 4.1 Making decisions and working together (Board of Management)	However BA feels that many visitors and potential visitors view joint management as resulting in opaque and overly bureaucratic decision making and too many complex rules and restrictions especially when compared to other national parks. We believe that the level of knowledge and understanding of the number of traditional owner groups involved, their differing aims, desires and concerns for the cultural and natural environment in the park, and the extensive consultations this must inevitably require, could and should be made better known to visitors it must not only cost substantially more to run the park under this model, but the decision making processes must also take considerably longer than in comparable situations.	No change to the plan. This plan and other park communication material available for visitors do describe the joint management process. An interpretation strategy will be developed and reviewed under Section 6.4 and consistent with the key messages in Section 6.3.1.
Section 5.1 Looking after culture	Bushwalking Australia believes that more can and should be done to better educate visitors concerning the deep emotional and spiritual connections and traditions that Bininj/Mungguy have with country and cultural sites.	No change to the plan. This matter is covered by the park interpretation strategy (Action 6.4.3) and the park signage project (Action 6.4.10).
Section 5.3 Managing park-wide threats affecting values	Bushwalking Australia also believes that there is a role for suitably skilled and qualified contractors, under supervision, in managing threats, for example from feral animals such as pigs and cats.	No change to the plan. The plan does not prohibit engagement of contractors to assist in managing threats.
Section 6.1 Destination and visitor experience development	To maximise the number of bushwalking visitors to Kakadu, and to encourage them to stay longer in the park, Kakadu needs to offer a range of opportunities from short walks of an hour or so, the day walks, walks of two to three days and extended walks.	No change to the plan. Covered by Actions 6.1.7 and 6.1.10 where opportunities for more walking routes throughout the park will be considered in the walking strategy and through the precinct planning process.

Plan reference	Comments in the submissions	Response
Bushwalking Australia		
Section 6.1 Destination and visitor experience development	Bushwalking Australia (BA) notes that over the life of the plan, new experiences will be considered consistent with this plan. While BA is supportive of new experiences being developed, we are also keen to see better management and administration of existing experiences to encourage and facilitate more people to visit and experience Kakadu.	No change to the plan. Covered by Action 9.3.4 which commits to reviewing and, where possible, improving systems for the processing, administration and management of permits. Also Actions 6.1.7 and 6.1.10 where opportunities for more walking routes throughout the park will be considered in the walking strategy and through the precinct planning process.
Section 6.1 Destination and visitor experience development	The author of this submission first visited Kakadu in 1987, has returned several times since that time and has travelled extensively in outback Australia. The view of Kakadu as Kakadon't has gained currency over that time and is now quite common. The reasons for this are many and complex and some are mentioned elsewhere in this submission.	No change to the plan. Commentary only. The current practice of managing access within the park is a result of the recognition of the significance of the World Heritage values of the park and reflect best practice.
Section 6.1 Destination and visitor experience development	Most visitors have little understanding or appreciation of the reasons behind access restrictions, believing that they are arbitrary and overly restrictive and contributes to the widely held and widely repeated Kakadon't message often referred to by travellers.	No change to the plan. The current practice of managing access to the park is a result of recognition of the significance of the World Heritage values of the park and reflect best practice and this message is conveyed through information available to visitors. The potential for opening up new areas is considered through the Visitor Experience/ Precinct Planning process (Action 6.1.7).
Section 6.1 Destination and visitor experience development	It would help if there were more approved routes. It should be possible to identify and map routes that avoid sites of significance. If people saw more areas being opened than closed, it would be one more thing to counteract the 'Kakadon't' message which is encountered all too often.	No change to the plan. Covered by Actions 6.1.7 and 6.1.10 where opportunities for more walking routes throughout the park will be considered in the walking strategy and through the precinct planning process.
Section 6.1 Destination and visitor experience development	Bushwalkers are by nature independent, self-reliant and adventurous. Kakadu offers opportunities to experience a unique combination of a near wilderness environment, stunning landscapes and the cultural history of the traditional owners and custodians of the land. Most bushwalks are of short duration, often of less than a day. Most bushwalkers only undertake walks of up to one day's duration, and even those who prefer overnight or extended walks will undertake short walks too.	No change to the plan. Commentary only.
Section 6.2 Commercial tourism development and management	Bushwalking Australia (BA) recognises that commercial tour operators play an important role in providing visitor experiences in the park, including bushwalking. BA is not opposed to the licensing of additional commercial operators in the park, provided that they are properly accredited and managed.	No change to the plan. Supportive comment.

Plan reference	Comments in the submissions	Response
Bushwalking Australia		
Section 6.2 Commercial tourism development and management	Bushwalking Australia fully supports efforts and initiatives that will facilitate the establishment and development of Bininj/Mungguy tourism opportunities, so long as they do not impact negatively on the environmental and cultural integrity of the national park.	No change to the management plan. Section 9.4 sets environmental impact assessment processes for new development proposals in the park.
Section 6.3 Promotion and marketing	One of the contributory factors is the lack of awareness by many visitors of seasonal changes — and of the good reasons to visit Kakadu in each-season that should be promoted more widely. For example, too much of the promotion and marketing information seen by potential visitors feature stunning wet season images of attractions such as Jim Jim Falls and Twin Falls. Dry season visitors are therefore disappointed and worse when they discover that these features do not look anything like the marketing.	No change to the plan. Covered by actions in Section 6.1. including Action 6.1.8 Investigate, develop and implement strategies to increase annual visitor numbers to the park, the spread of visitor numbers across the seasons and the average length of stay in the park; and Action 6.3.2 Liaise with the tourism industry to ensure that promotion of the park helps to create appropriate visitor expectations about all activities including awareness of seasonal changes and unique opportunities for visitors throughout the year.
Section 9.01 Safety and incident management	“Bininj/Mungguy feel a sense of responsibility for all people visiting their country, and feel distressed if a visitor is injured or dies.” While this may be known by some visitors, Bushwalking Australia believes that most visitors do not know this, and even those that do, do not really understand. It is probably impossible for a Balanda to fully understand the effect on a traditional owner should a visitor be injured or die however we strongly encourage park management to provide more information on this on the Kakadu web site and especially to those visitors applying for walk permits.	No change to the plan. This matter is covered by Section 9.1 Safety and incident management and specifically Actions 9.1.10 and 9.1.11 about communicating the importance of staying safe in the park.
Section 9.01 Safety and incident management	Every bushwalk undertaken by every bushwalker involves a level of risk management, with the longer and more difficult (and more remote) the walk, the more risk that needs to be understood and managed. However even on the best organised, best planned walk by the most experienced and prepared bushwalkers, accidents can and do occur. BA endorses the current requirement that all groups undertaking overnight walks in Kakadu carry at least one Personal Locator Beacon (PLB) or satellite phone.	No change to the plan. Safety and incident management including communication with visitors is covered by Section 9.1.

Plan reference	Comments in the submissions	Response
Bushwalking Australia		
Section 9.03 Authorising and managing activities	The current process for applying for a bushwalking permit is widely seen in bushwalking circles as being complex, unwieldy, unfair and not transparent. It is deterring visitors and adding to the idea of Kakadon't in the bushwalking community. This must change.	No change to the plan. The permit system will remain an ongoing requirement under the current legislation to allow a range of activities to be conducted within the Park. It exists as a mechanism to allow both individuals, organisations and businesses to utilise the resources of the Park without undermining the values of the reserve. Under Action 9.3.4 the park is committed to reviewing and, where possible, improving systems for the processing, administration and management of permits.
Section 10.7 Recreational activities	For a start, details of walking routes that can be booked must be made available online. An on-line map of approved/available routes with information on availability included. Applying for a permit and/or booking camp sites in particular is becoming common across Australia and is something that most bushwalkers accept.	No change to the plan. The park does not provide a map of approved routes and campsites on-line because overnight bushwalking, and bushwalking in remote and off-track areas in Kakadu presents a much higher level of risk to visitor safety than marked walks. These walks can be physically demanding and require a high level of navigation skills. By not advertising the routes, people are required to do their own research and talk to local clubs to find out about the routes. Applicants need to demonstrate they meet the required level of preparedness and skill before a permit can be issued. Walking in the park will be managed under the walking strategy (Action 6.1.10). Consideration will be given to some of the issues around walking routes and permits.
Section 10.7 Recreational activities	A permit fee or security bond refundable on completion of the planned trip might discourage speculative booking and permit holders doing the wrong thing on their walk such as visiting sensitive or unauthorised sites.	No change to the plan. Issues around bushwalking permits will be considered in the walking strategy (Action 6.1.10).
General comment	The Draft Management Plan is a large and complex document reflecting the size and complexity of the national park itself. BA sought comment, suggestions and ideas on the draft plan from the bushwalking community across Australia however the number of responses received have been small.	No change to the plan. Commentary only. The plan itself is a legislative instrument and enables activities otherwise restricted by EPBC Legislation. It covers the management of the park for a 10 years period and could not be condensed further. The plan recognises the importance of Kakadu as a destination for bushwalkers and visitor experience plans being developed for precincts (Action 6.1.7) will explore new opportunities for bushwalking in the park as will the walking strategy (Action 6.1.10).

Plan reference	Comments in the submissions	Response
Colong Foundation for Wilderness		
Section 3. General provisions and IUCN category	<p>The removal of park zones has not resulted in more park visitation, which has declined over the last ten years. The costs of effective park management have increased, with the emergence of new threats to heritage values from new invasive species.</p> <p>Submission page reference: 1</p>	<p>No change to the plan. The plan identifies that visitation started to decline around 2009 due to a number of factors including the effects of the global financial crisis. The plan does not suppose that park visitation has been effected by the removal of park zones (that were used in the 4th management plan for the park).</p>
Section 3. General provisions and IUCN category	<p>The location of proposed living areas should be defined by a zoning map, along with resorts and other commercial activities. Figures 2 and 16 and section 9.5 are not adequate to track these matters. This non-regulation of extensive and intensive visitor use and tourist infrastructure development is unacceptable for a national park.</p>	<p>No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan.</p> <p>The category to which the park is assigned is guided by the purposes for which the park was declared. The Environmental Reform (Consequential Provisions) Act 1999 deems the park to have been declared for the following purposes:</p> <ul style="list-style-type: none"> - the preservation of the area in its natural condition - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. <p>This is equivalent to IUCN category II - National Park.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan are rigorous, and the Guidelines for EIA (2008) in place under the plan ensures protection of natural and cultural values.</p>
Section 3. General provisions and IUCN category	<p>Commercial tourism can be almost as damaging as mining to Kakadu National Park. Large concentrations of people mean lots of sewage, sealed roads, an airport, clearing, large resorts and infrastructure, power lines, telephones, mountains of rubbish and all the air conditioned comforts of home. It was and is madness to remove the park's zoning scheme, particularly the wilderness zone. The public have no certainty regarding the future protection, development and use of the park.</p>	<p>No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan.</p> <p>The category to which the park is assigned is guided by the purposes for which the park was declared. The Environmental Reform (Consequential Provisions) Act 1999 deems the park to have been declared for the following purposes:</p> <ul style="list-style-type: none"> - the preservation of the area in its natural condition - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. <p>This is equivalent to IUCN category II - National Park.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan are rigorous, and the Guidelines for EIA (2008) in place under the plan ensures protection of natural and cultural values.</p>

Plan reference	Comments in the submissions	Response
Colong Foundation for Wilderness		
Section 3. General provisions and IUCN category	<p>The description given to adaptive management (page 147) fails to acknowledge that such regulation does not protect any part of the national park from any particular class of development or actions permitted under the Environment Protection and Biodiversity Conservation Act and its regulations.</p> <p>Submission page number: 2</p>	<p>No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan.</p> <p>The category to which the park is assigned is guided by the purposes for which the park was declared. The Environmental Reform (Consequential Provisions) Act 1999 deems the park to have been declared for the following purposes:</p> <ul style="list-style-type: none"> - the preservation of the area in its natural condition - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. <p>This is equivalent to IUCN category II - National Park.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan are rigorous, and the Guidelines for EIA (2008) in place under the plan ensures protection of natural and cultural values.</p>
Section 3. General provisions and IUCN category	<p>Without a zoning map the Board and Director are made vulnerable to unreasonable political pressure and demands of the day. The draft plan of management continues to allow park management operations to be politicised and unfortunately enables the Director to make decisions some of which will inevitably be construed as unreasonable and controversial.</p> <p>A plan with zones is or should be a shield that will defend the park (and its managers) from political expectations of the day.</p>	<p>No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan.</p> <p>The category to which the park is assigned is guided by the purposes for which the park was declared. The Environmental Reform (Consequential Provisions) Act 1999 deems the park to have been declared for the following purposes:</p> <ul style="list-style-type: none"> - the preservation of the area in its natural condition - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. <p>This is equivalent to IUCN category II - National Park.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan are rigorous, and the Guidelines for EIA (2008) in place under the plan ensures protection of natural and cultural values.</p>

Plan reference	Comments in the submissions	Response
Colong Foundation for Wilderness		
Section 3. General provisions and IUCN category	An equivalent town plan to the Kakadu draft plan, for say Darwin, would be a blank map. In other words, the sixth draft plan gives carte blanche, a free hand, within the bounds of the law, to the Board and the Minister, and this is unacceptable. A plan of management for a national park should be prescriptive and define what activities should take place and where these activities should occur. The Board and the Minister should be required to place these intentions on the table through the plan. The draft sixth plan of management is not a plan in the town planning sense.	<p>No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan.</p> <p>The category to which the park is assigned is guided by the purposes for which the park was declared. The Environmental Reform (Consequential Provisions) Act 1999 deems the park to have been declared for the following purposes:</p> <ul style="list-style-type: none"> - the preservation of the area in its natural condition - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. <p>This is equivalent to IUCN category II - National Park.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan are rigorous, and the Guidelines for EIA (2008) in place under the plan ensures protection of natural and cultural values.</p>
Section 3. General provisions and IUCN category	The ecological and technological footprint of a settlement usually increases through time. It follows that over time Kakadu will have a growing number of increasingly sophisticated villages, along with a growing number of roads and more infrastructure. The sixth draft plan fails to regulate this, except to require environmental assessment, abdicating any responsibility for the location of these activities, something no town plan for a settlement in Australia would do. In other words, the draft plan unfairly disadvantages heritage values in the national park by not providing protection that in other areas of Australia is mandated through town plans. This is unfair and unreasonable.	<p>No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan.</p> <p>The category to which the park is assigned is guided by the purposes for which the park was declared. The Environmental Reform (Consequential Provisions) Act 1999 deems the park to have been declared for the following purposes:</p> <ul style="list-style-type: none"> - the preservation of the area in its natural condition - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. <p>This is equivalent to IUCN category II - National Park.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan are rigorous, and the Guidelines for EIA (2008) in place under the plan ensures protection of natural and cultural values.</p>

Plan reference	Comments in the submissions	Response
Colong Foundation for Wilderness		
Section 3. General provisions and IUCN category	There are no prescriptions in the draft plan as to where intensive or moderate use areas will be located. Development could take place anywhere under the life of the sixth plan of management. This is highly undesirable because it provides no certainty for the protection of the park's heritage values. In effect, any part of the national park could be developed as an intensive use zone to the detriment of heritage conservation.	<p>No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan are rigorous, and the Guidelines for EIA (2008) in place under the plan ensures protection of natural and cultural values.</p>
Section 3. General provisions and IUCN category	Given that development has already taken place in Kakadu, zoning and land use tables can and should require the protection of heritage values and limit the intensity of permitted activities. Without these provisions, the public can have little confidence in the park's future management.	<p>No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan.</p> <p>The category to which the park is assigned is guided by the purposes for which the park was declared. The Environmental Reform (Consequential Provisions) Act 1999 deems the park to have been declared for the following purposes:</p> <ul style="list-style-type: none"> - the preservation of the area in its natural condition - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. <p>This is equivalent to IUCN category II - National Park.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan are rigorous, and the Guidelines for EIA (2008) in place under the plan ensures protection of natural and cultural values.</p>

Plan reference	Comments in the submissions	Response
Colong Foundation for Wilderness		
Section 3. General provisions and IUCN category	It may be that Kakadu should be reclassified as a regional park or Indigenous reserve if these developments continue as they are incompatible with national park status.	<p>No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan.</p> <p>The category to which the park is assigned is guided by the purposes for which the park was declared. The Environmental Reform (Consequential Provisions) Act 1999 deems the park to have been declared for the following purposes:</p> <ul style="list-style-type: none"> - the preservation of the area in its natural condition - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. <p>This is equivalent to IUCN category II - National Park.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan are rigorous, and the Guidelines for EIA (2008) in place under the plan ensures protection of natural and cultural values.</p>
Section 3. General provisions and IUCN category	<p>The Colong Foundation for Wilderness believes that Australia’s premier national park, Kakadu, is not adequately protected by the fifth plan of management or the draft sixth plan. The fifth draft plan of management removed all zoning controls and the table of defined permitted activities within each zone. Removal of these zones by plan five has placed the preservation of the park’s heritage values at risk.</p> <p>Submission page reference: 1</p>	<p>No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan.</p> <p>The category to which the park is assigned is guided by the purposes for which the park was declared. The Environmental Reform (Consequential Provisions) Act 1999 deems the park to have been declared for the following purposes:</p> <ul style="list-style-type: none"> - the preservation of the area in its natural condition - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. <p>This is equivalent to IUCN category II - National Park.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan are rigorous, and the Guidelines for EIA (2008) in place under the plan ensures protection of natural and cultural values.</p>

Plan reference	Comments in the submissions	Response
Colong Foundation for Wilderness		
Section 3. General provisions and IUCN category	<p>We request that you amend the sixth Kakadu National Park plan of management so that it contains:</p> <ul style="list-style-type: none"> • A zoning table and zoning map, securing protection of its heritage values, particularly its wilderness values from inappropriately located visitor facilities (i.e. reinstate Zone 4 from the fourth plan); <p>Submission page reference: 1</p>	<p>No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan.</p> <p>The category to which the park is assigned is guided by the purposes for which the park was declared. The Environmental Reform (Consequential Provisions) Act 1999 deems the park to have been declared for the following purposes:</p> <ul style="list-style-type: none"> - the preservation of the area in its natural condition - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. <p>This is equivalent to IUCN category II - National Park.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan are rigorous, and the Guidelines for EIA (2008) in place under the plan ensures protection of natural and cultural values.</p>
Section 3. General provisions and IUCN category	<p>The prior removal of zones made development control in this national park far less prescriptive and it concentrated power in the hands of the Board and the Director of National Parks. The Colong Foundation strongly objects to this concentration of power and the contingent erosion of statutory protection afforded this World Heritage listed national park.</p> <p>Submission page number: 2</p>	<p>No change to the plan.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan are rigorous, and the Guidelines for EIA (2008) in place under the plan ensures protection of natural and cultural values.</p>
Section 3. General provisions and IUCN category	<p>Wilderness protection in Kakadu National Park should be reinstated as a matter of priority and greatly expanded to protect environmentally sensitive park areas and to protect them from increasing development pressures that are proposed to be facilitated by the draft plan under section 10.</p>	<p>No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan</p> <p>The category to which the park is assigned is guided by the purposes for which the park was declared. The <i>Environmental Reform (Consequential Provisions) Act 1999</i> deems the park to have been declared for the following purposes:</p> <ul style="list-style-type: none"> - the preservation of the area in its natural condition - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. <p>This is equivalent to IUCN category II - National Park.</p>

Plan reference	Comments in the submissions	Response
Colong Foundation for Wilderness		
Section 3. General provisions and IUCN category	Wilderness management is the highest possible standard of conservation because it precludes all forms of development. The fact that Aboriginal people lived in it is testimony that wilderness and traditional Aboriginal land use are compatible (provided the use of permanent dwellings, vehicles and guns is not encompassed in the definition of traditional land use).	<p>No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan</p> <p>The category to which the park is assigned is guided by the purposes for which the park was declared. The <i>Environmental Reform (Consequential Provisions) Act 1999</i> deems the park to have been declared for the following purposes:</p> <ul style="list-style-type: none"> - the preservation of the area in its natural condition - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. <p>This is equivalent to IUCN category II - National Park.</p>
Section 3. General provisions and IUCN category	It is also completely unacceptable to establish park visitor ‘safari camps’ in an ad hoc manner as the Board and Director see fit. These kinds of developments should be subjected to zoning regulation, to decide whether these facilities should be established at various locations or not. There should not be an endless proliferation of camping areas. New areas should not be established, except through definite proposals indicated in the draft plan and on a map. As no developments are indicated, there should be none developed during the life of this plan.	<p>No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan</p> <p>The category to which the park is assigned is guided by the purposes for which the park was declared. The <i>Environmental Reform (Consequential Provisions) Act 1999</i> deems the park to have been declared for the following purposes:</p> <ul style="list-style-type: none"> - the preservation of the area in its natural condition - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. <p>This is equivalent to IUCN category II - National Park.</p> <p>Section 6.1 of the plan provides actions for visitor experience development. It provides for precinct planning (see action 6.1.7). Through the development of precinct plans decisions will be made by the Board and the Director about the areas in which particular visitor experience developments will be considered.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan are rigorous, and the Guidelines for EIA (2008) in place under the plan help to ensure protection of natural and cultural values.</p>

Plan reference	Comments in the submissions	Response
Colong Foundation for Wilderness		
Section 4.1 Making decisions and working together (Board of Management)	In most of Australia development control on private land is vested in local government. Where there is a conflict of interest in development control under local government, those with interests are required to declare them and not partake in related decision-making. The current administrative arrangement of the Board is open to the risk of corruption. There needs to be a separation of decision-making from land owners, regardless of the issues of land rights. The protection of decision-makers from temptations of self-interest is important to ensure due process.	No change to the plan. The Board of Management has an agreed set of meeting rules supported by the EPBC Regulations which require members to declare any conflict of interest.
Section 4.1 Making decisions and working together (Board of Management)	There are several Aboriginal groups in Kakadu and each has different ideas as to what development within the park is appropriate. There are for example land trust areas and three land claim areas shown on Figure 3 in the draft plan (page 8). Some groups are no doubt more preservationist, while others want a lot more tourism development. The sixth plan of management fails to indicate that the different opinions of the traditional owners will potentially fragment the park according to these different aspirations. Against these interests and claims is the park lease, which should unify through the plan of management in the same way a town plan unifies development control and management despite there being many land interests.	No change to the plan. The park has a strong Environmental Impact Assessment process (Section 9.5) via which development proposals are assessed and then considered by the Board as a whole for a decision. Tourism development is considered through precinct planning (Section 6.1) with representation of the relevant clan groups.
Section 4.1 Making decisions and working together (Board of Management)	The Colong Foundation is strongly opposed to a Kakadu Board of Management that has a majority of members that are pro-development. A prerequisite of Board membership should be the protection of the park's ecological integrity and heritage.	No change to the plan. The park has a strong Environmental Impact Assessment process (Section 9.5) via which development proposals are assessed and then considered by the Board. Tourism development is considered through precinct planning (Section 6.1) with representation of the relevant clan groups. The Board of Management has an agreed set of meeting rules supported by the EPBC Regulations which require members to declare any conflict of interest.
Section 5.3 Managing park-wide threats affecting values	There is a decline in threatened small mammal species due to the incursion of fires from outside the park as well as the increase in invasive species. Submission page reference: 1	No change to the plan. Covered by Sections 5.2 and 5.3 which acknowledge that increased fire intensity and frequency and invasive species are acknowledged as key threats to small mammals. This is also acknowledged in the Threatened Species Strategy.

Plan reference	Comments in the submissions	Response
Colong Foundation for Wilderness		
Section 5.3 Managing park-wide threats affecting values	It is incredible that concepts of critical fire threshold frequencies (5.3.24) are not already a cornerstone of park management, suggesting the basics of park management are still deficient after 40 years. This is unacceptable by any standard, let alone for a Federal Government managed World Heritage listed national park. Submission page reference: 1	No change to the plan. The park has invested significant resources in fire management since the declaration of the park, ensuring that regeneration of vegetation provides habitat and resources for fauna in the park, while minimising any impact of such burns. The development of thresholds and acceptable ranges for fire regimes for all threatened terrestrial animal and plant species is an outcome of discussions with the Kakadu Research and Management Advisory Committee which includes the outcomes of significant scientific research and advice. The action described in 5.3.24 will further improve current fire management processes and does not suggest that the basics of park management are deficient.
Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion	The Colong Foundation believes that the reason for reduced visitor numbers is more to do with perceptions that the park is no longer effectively managed.	No change to the plan. The decline in visitor numbers is directly related to a decline in tourism across the globe as a result of the September 2001 terrorism attacks and the global financial crisis in 2009. Visitation to the park started to decline around 2009 due to a number of factors including the after effects of the global financial crisis. However, this trend appears to have been arrested with visitation to the park increasing since early 2014, particularly from the domestic market. Significant resources are being committed to improving visitor experiences in the park and increasing visitor numbers in a sustainable way.
Section 6.1 Destination and visitor experience development	There is no statement explaining visitor levels or analysis as to what is needed for expected use levels over the life of the new plan, whether and where visitor facilities should be provided, if use levels should be capped or if any areas should be protected from development. The consideration of sustainable use levels and ecologically sustainable use is totally absent, such as ultimate desirable use levels for various sites, including those specified in Figure 16.	No change to the plan. Covered by Section 6 that identifies the changes in visitation over recent years and specifically commits to increasing visitor numbers in a sustainable way and providing opportunities for diverse and enriching visitor experiences which are promoted in an appropriate way. The Policies and Actions included in Section 6.1 emphasise that tourism will be managed to protect natural and cultural values. The Tourism Master Plan and precinct plans (Actions 6.1.6 and 6.1.7) provide for more detailed planning of visitor facilities and ensure they are culturally appropriate and environmentally sustainable.
Section 6.1 Destination and visitor experience development	We request that you amend the sixth Kakadu National Park plan of management so that it contains: • A cap on annual visitor levels at 200,000 to prevent over use of popular areas; and Submission page reference: 2	No change to the plan. Covered by Section 6 which commits to increasing visitor numbers in a sustainable way and providing opportunities for diverse and enriching visitor experiences which are promoted in an appropriate way. The permit system (managed in accordance with Section 9.3) is also used to restrict visitation to sensitive areas and manage overuse of popular areas.

Plan reference	Comments in the submissions	Response
Colong Foundation for Wilderness		
Section 6.1 Destination and visitor experience development	The draft plan apparently operates on the assumption that tourism development can take place anywhere without specifically defined limits.	No change to the plan. Covered by Section 9.5 that specifies how proposed actions will be assessed - including tourism developments.
Section 8.1 Outstations and living on country	Further, the draft plan offers no adequate explanation of the leases and subleases for the three land trusts or how these relate to outstations. Will the number of outstations multiply by a factor of three?	No change to the plan. It is not anticipated that there will be a significant increase in the number of outstations in the park. Proposals for establishing new outstations will be assessed in accordance with Section 9.5 (Assessment of proposals) and managed according to the Outstations Guide to Development (2014) (Policy 8.1.3).
Section 8.1 Outstations and living on country	The draft plan facilitates inappropriate expansion of the human footprint on the park, and the only measure to limit this growth is environmental impact assessment. The draft plan does not propose minimum standards for the regulation of waste, sewage, and facilities that will accompany the growing number of living areas.	No change to the plan. There are provisions and processes in place under Section 9.5 (Assessment of proposals) to assess proposed developments in the park. The park is working with stakeholders in the park on waste management issues and in accordance with Policy 8.2.18 will take all reasonable steps to have environment protection and waste management measures undertaken in Jabiru to a high standard.
Section 8.1 Outstations and living on country	The proliferation of Aboriginal on-country camps need to be planned so that these do not unduly impact on the natural environment or further limit public use of Kakadu. The sixth draft plan should at least have initiated a conversation about why settlement areas are closed to the public, what if any area around on-country camps should be closed to the public, and how many other parts of the national park may become closed under this exclusionary policy.	No change to the plan. The supposition that there is a proliferation of Aboriginal on-country camps being allowed in the park without environmental impact assessments occurring is inaccurate. The environmental impact assessment (EIA) process outlined in section 9.5 of the plan, and the Guidelines for EIA (2008) provide protection of natural and cultural values. Settlement areas are closed to the general public to provide privacy to Aboriginal families in these communities. In addition, access to Aboriginal land in the NT is regulated through permits. Hence access restrictions for the general public to outstations in the park is supported by the Director of National Parks. Kakadu is a jointly managed park and over 50% of the park is owned by Aboriginal land trusts
Section 8.1 Outstations and living on country	The draft plan does not acknowledge these problems or consider any realistic resolution of the living area issue. Burying controversial issues demonstrates the administrative weakness of this draft plan of management. These issues need to be brought into the daylight and discussed.	No change to the plan. The number of outstations has remained relatively constant since the park was established. Outstations are private living areas that are essential for Traditional Owners to maintain connection to and care for country. The presence of people on country is regarded as integral to managing landscapes of northern Australia.

Plan reference	Comments in the submissions	Response
Colong Foundation for Wilderness		
Section 8.1 Outstations and living on country	<p>The public has a right to know how many living areas there are now and how many more living areas are going to be proposed under the life of the plan and the locations of these. These matters should be clearly stated in the plan of management: they have continued to be secret for decades as the number of people living in the national park and living areas have never been specified. This is unacceptable for a national park. This is like stating that a local government town plan need no longer need to specify where villages and settlements can occur. Any government that made such a law would be voted out of office.</p> <p>There should be no further settlements established in the national park and existing settlements should be phased out. Yet the opposite is proposed.</p>	<p>No change to the plan. There is no requirement for the management plan to specify the location or number of living areas within the park. Outstations are private living areas that are essential for Traditional Owners to maintain connection to and care for country and the number of outstations has remained relatively constant since the park was established.</p> <p>Proposals for establishing new outstations will be assessed in accordance with Section 9.5 (Assessment of proposals) which provides for protection of the natural and cultural values, and managed according to the Outstations Guide to Development (2014) (Policy 8.1.3).</p>
Section 8.2 Jabiru	<p>The township of Jabiru was established to house people associated with uranium mining in the region. The town was opposed by the conservation movement at the Fox Inquiry and in reply the mining industry stated it would only be temporary. If natural and cultural values of this national park are to be respected, Jabiru must be relocated to a site outside the park when uranium mining ceases.</p>	<p>No change to the plan.</p> <p>This matter is covered in Section 8.2 which explains the following: In 1997 the Mirarr applied for a determination of native title under the Native Title Act 1993 over the Jabiru lease area and two other adjoining areas of the park excluded from the grant, and are the registered native title claimants. In 2009 an agreement was reached to settle the native title claim. Under the settlement the claim areas would be granted as Aboriginal land under the Land Rights Act and leased by the relevant Aboriginal Land Trust to a suitable lessee for the purposes of continued use as a town.</p>
Section 8.2 Jabiru	<p>Contrary to the recommendations of the Fox Report, Jabiru is to continue and, ironically, its development is regulated by the zones in the town plan (8.2.6 (c), page 122). This arrangement condones serious ongoing environmental degradation and increased sewage and waste disposal problems similar to those that have significantly degrade Kosciuszko National Park. Urban expansion after Ranger may require a high tension powerline through the national park or a gas pipeline, if natural gas is to power the Ranger generators, given the heavy use of air conditioners in the town's existing dwellings.</p>	<p>No change to the plan. This matter is covered in Section 8.2 which contains provisions for the future of Jabiru township and minimising environmental impacts on the environment and Section 10.3 covers some of the responsibilities of West Arnhem Regional Council in terms of sewage and waste management in Jabiru.</p>
Section 8.2 Jabiru	<p>The draft sixth plan fails to discuss the consequences of Ranger's closure in relation to the power supply that would terminate.</p>	<p>No change to the plan. Decisions around electricity generation following decommissioning of the Ranger mine will be made in a manner consistent with Section 9.4 Capital works and infrastructure and Section 9.6 Resource use in park operations. Construction of any generation facility would also involve Environmental Impact Assessment (Section 9.5) of the management plan.</p>

Plan reference	Comments in the submissions	Response
Colong Foundation for Wilderness		
Section 8.2 Jabiru	It [the draft plan] fails to explain how the Jabiru airfield will be maintained. The Jabiru and the Cooinda airfields should be decommissioned and rehabilitated, or if needed for management purposes, maintained at a suitable standard.	No change to the plan. Decisions around maintenance of the Jabiru airfield following decommissioning of the Ranger mine would be made in a manner consistent with Section 9.4 Capital works and infrastructure. The closure of airfields would be inconsistent with shared vision principles for tourism in the management plan; and would present significant public safety issues as air transport can be critical for airlifting to Darwin in the case of emergencies. Neither the Jabiru or Cooinda airstrips are currently within the park - they are in areas under lease.
Section 9.01 Safety and incident management	The sixth draft plan has no policy to protect pristine mountains from telecommunication facilities. The plan's policy of providing mobile phone coverage takes priority over protection of mountains and wilderness. This is not appropriate decision-making or priority setting for a national park.	No change to the plan. Action 9.1.12 is to work with government and non-government agencies and other stakeholders to improve mobile phone coverage in the park. Any measures to improve mobile phone coverage will be subject to the Environmental Impact Assessment process outlined in section 9.5 of the management plan. The Environmental Impact Assessment process recognises and aims to protect the highly significant cultural and natural values of the park, particularly the stone country.
Section 9.03 Authorising and managing activities	All leases and licences should be placed on an internet accessible public register under Sections 9.3 and 10.3 of the draft plan. Alien uses should be eliminated and occupancy rights only provided where they benefit the protection and management of park values. The pretence that there is no clash between traditional owners and national park values is unhelpful. These inconsistent values need to be acknowledged.	No change to the plan. This matter is covered by Section 6 which refers to the Shared Vision for tourism which was developed in 2004 and adopted in the fifth plan of management as a guide to balance the primary importance of Kakadu's natural and cultural values with the development of a strategic approach to tourism. To facilitate development of visitor experiences consistent with the Shared Vision, the Tourism Master Plan (DNP 2009) was developed and supported by the joint management partners.
Section 9.03 Authorising and managing activities	A moratorium should be established on new occupancy entitlements, leases and licences until a review of these concessions identify those that are consistent with national park ethics. All tenure and occupancy permits should be subject to an environmental audit to ensure park values are preserved. In addition, they should lapse on expiry and only those consistent with national park values should be re-issued through a competitive public tender process.	No change to the plan. The management plan is supporting the aspirations of traditional owners to pursue livelihoods through commercial tourism ventures as specified in the shared vision for tourism. Leases and licences are managed in accordance with Section 9.3 and include a list of conditions to ensure the park values are protected.
Section 9.04 Capital works and infrastructure	The plan should impose a moratorium on road construction, particularly road construction in the broken stone country and on the Arnhem plateau.	No change to the plan. Any proposed new roads are assessed in accordance with the environmental impact assessment (EIA) process outlined in section 9.5 of the plan, and the Guidelines for EIA (2008) in place under the plan to ensure protection of the natural and cultural values. It is highly unlikely any roads will be built in the Stone Country due to the rugged nature of the terrain.

Plan reference	Comments in the submissions	Response
Colong Foundation for Wilderness		
Section 9.04 Capital works and infrastructure	The park is already adequately roaded. No new roads, sealed or unsealed, should be developed in the park. The shortage of gravel for roads may be eliminated through an audit of existing roads in the park and closure of unnecessary roads. As part of the rehabilitation program for the many kilometres of unnecessary secondary roads, the gravel from the closed roads may be cannibalised to maintain the retained roads. One of the greatest threats to natural values is the use of tracks by off-road vehicles. Except for the existing maintained roads there should be no road access to undeveloped areas.	<p>No change to the plan. The following policies in the management plan adequately address issues associated with the construction and maintenance of roads in the park:</p> <p>9.4.2 Sand, gravel and other earth materials may be extracted for park management purposes in accordance with guidelines for the operation of gravel pits, to ensure minimal impact to park values and the rehabilitation of affected areas.</p> <p>9.4.3 The Director may bring inert treated crushed rock into the park for the purpose of road works.</p> <p>9.4.4 New capital works and infrastructure and upgrades to existing infrastructure, will:</p> <p>(a) as far as practicable incorporate cost-effective environmental design, including efficient resource use and low-maintenance designs and materials</p> <p>(b) comply with all relevant laws, standards, and codes of practice and be consistent with other park policies and strategies</p> <p>(c) as far as practicable provide access for all members of the public, including the physically impaired.</p>
Section 9.05 Assessment of proposals	The draft sixth plan does not report the extent of development that has taken place in relation to the fifth Plan. The reader cannot understand what has changed since the last plan was adopted.	No change to the plan. There is no requirement for the plan to report on the extent of development that has taken place in the park. Including such information in the plan would immediately date the plan and it would also increase the length of an already long plan. The Background of each section of the plan does already note the key actions that occurred during the life of the previous plan. An audit of implementation of the 5th management plan contributed to the development of the 6th plan.
Section 9.08 Revenue and Business Development	Increased fees may be seen by park managers as a way of overcoming the revenue shortfall but this approach will further reduce visitation levels and visitors will go elsewhere.	<p>No change to the plan. The review of entry fees in the park is the first review for many years. The Minister has set a new fee structure which will be introduced in April 2016 which will introduce a lower fee for the wet season compared to the dry season, potentially encouraging more visitor to the park during this period. Territorians will continue to be able to enter the park for free. The review of fees is less about increasing funding for the park and more about introducing a sensible fee structure on par with other national and international attractions, to attract visitors to the park throughout the year.</p> <p>The decline in visitor numbers is directly related to a decline in tourism across the globe as a result of the September 2001 terrorism attacks and the global financial crisis. Significant resources are being committed to improving visitor experiences in the park and since early 2014 visitor numbers now appear to be trending upwards.</p>

Plan reference	Comments in the submissions	Response
Colong Foundation for Wilderness		
Section 10.1 Authorisation of allowable activities	We request that you amend the sixth Kakadu National Park plan of management so that it contains: • A moratorium on new occupancy entitlements, leases and licences until all these are reviewed for consistency with national park and heritage values; Submission page reference: 2	No change to the plan. Certain activities may be carried out in the park in accordance with a permit, approval, commercial activity licence, occupation licence, sublease or lease issued by the Director of National Parks. Proposed actions that are considered to have more than a negligible impact will be assessed in accordance with the park's Environmental Impact Assessment (EIA) process.
Section 10.3 Living in the park (outstations and Jabiru)	Section 10 also facilitates further development of outstations in the national park. Construction of dwellings in the national park will have adverse impacts related to land clearing, the population size of the settlement and the technological level of its resident population.	No change to the plan necessary. The Kakadu National Park Board of Management's position is that outstations are integral in maintaining connection to country and culture. Proposals to develop new outstations are managed in accordance with the Outstations Guide and require approval by the Board of Management. The environmental impact assessment (EIA) process outlined in section 9.5 of the plan, and the Guidelines for EIA (2008) in place under the plan ensure protection of natural and cultural values.
Section 10.4 Access	Finally, the use of aircraft over the park is an aggravating disturbance of the natural environment, particularly helicopters and joy flights. There is no need for aircraft activity in the park, except for management and rescue work.	No change to the plan necessary. This matter is covered by Policies 10.4.8-10.4.11 which provide for management of aircraft in the park in accordance with EPBC Regulations and are sensitive to minimising disturbance in the park. The Fly Neighbourly Agreement is also in place under the management plan.
Section 10.8 Commercial tourism and accommodation	Kakadu is developed enough and should not be thrown open to more luxury camps and lodges, particularly within former protected wilderness.	No change to the plan. The plan allows for consideration of new accommodation facilities in accordance with the environmental impact assessment (EIA) process outlined in section 9.5 of the plan, and the Guidelines for EIA (2008) in place under the plan ensures protection of natural and cultural values. Action 10.8.10. also provides for commercial accommodation facilities to be established and operated in the park on areas occupied under a lease, sublease or occupation licence granted by the Director with the approval of the Board and consistent with Section 9.5 (Assessment of proposals).

Plan reference	Comments in the submissions	Response
Colong Foundation for Wilderness		
Section 10.8 Commercial tourism and accommodation	Section 10 facilitates commercial accommodation, yet does not specify where such development should be located. There is no regulation of bed numbers or other prescriptions in the new draft plan to curb development. All visitor accommodation should be relocated outside the national park boundaries as existing lease arrangements reach their expiry date.	No change to the plan. The plan allows for consideration of new accommodation facilities in accordance with the environmental impact assessment (EIA) process outlined in section 9.5 of the plan, and the Guidelines for EIA (2008) in place under the plan ensures protection of natural and cultural values. Action 10.8.10. also provides for commercial accommodation facilities to be established and operated in the park on areas occupied under a lease, sublease or occupation licence granted by the Director with the approval of the Board and consistent with Section 9.5 (Assessment of proposals). Relocating visitor accommodation outside the park is inconsistent with the shared vision principles for tourism in Kakadu listed in the draft management plan.
Section 10.8 Commercial tourism and accommodation	Commercial accommodation should be located at the western margin of the national park. Existing bed numbers should be stated in the plan of management. Bed numbers should not increase. The only acceptable development would be one which relocated existing facilities to the western margin of the park and rehabilitated the existing development sites.	No change to the plan. The plan allows for consideration of new accommodation facilities in accordance with the environmental impact assessment (EIA) process outlined in section 9.5 of the plan, and the Guidelines for EIA (2008) in place under the plan ensures protection of natural and cultural values. Action 10.8.10. also provides for commercial accommodation facilities to be established and operated in the park on areas occupied under a lease, sublease or occupation licence granted by the Director with the approval of the Board and consistent with Section 9.5 (Assessment of proposals).
Section 10.8 Commercial tourism and accommodation	Kakadu National Park has much in common with Kosciuszko National Park. Unlike Kosciuszko, however, Kakadu does not intend to closely regulate development or actions and accordingly the park is at a greater risk from exploitation. For example, there are no limits on bed numbers in Kakadu resorts as there are in Kosciuszko.	No change to the plan. The environmental impact assessment (EIA) process outlined in section 9.5 of the plan is rigorous, and the Guidelines for EIA (2008) in place under the plan help to ensure protection of natural and cultural values.
Section 10.8 Commercial tourism and accommodation	We request that you amend the sixth Kakadu National Park plan of management so that it contains: • A prohibition on new visitor accommodation facilities and new roads; Submission page reference: 1	No change to the plan. Prohibition of new accommodation facilities and roads is inconsistent with the shared vision for tourism in the park identified in Section 6.1. The plan allows for consideration of new accommodation facilities and roads in accordance with the environmental impact assessment (EIA) process outlined in section 9.5 of the plan which helps to ensure protection of natural and cultural values.

Plan reference	Comments in the submissions	Response
Colong Foundation for Wilderness		
General comment	<p>Kakadu National Park needs a large injection of tax-dollars to bring management up to an adequate standard, and to confront key issues instead of hiding them from public scrutiny, as this draft plan does.</p> <p>Submission page reference: 1</p>	<p>No change to the plan necessary.</p> <p>The plan is not the appropriate mechanism to allocate funding to individual management programmes. Section 367 of EPBC Act specifies the mandatory content for management plans for Commonwealth Reserves. Section 367 does not specify that a management plan for a Commonwealth Reserve include costing.</p> <p>The management plan does not set the funding available to undertake management actions. Funding allocations for the park are determined by Government and revenue raised by the Park. Alternative sources of funding for the park will be pursued through Section 9.8 (Revenue and business development).</p>
General comment	<p>The current park management creates the wrong impression, that parks are not set aside from development. The sixth plan of management must curtail tourism and outstation development. If the plan fails in this duty, then the park should be reclassified as a reserve and removed from the World Heritage list rather than cause erosion of national park management standards in Australia.</p>	<p>No change to the plan.</p> <p>The environmental impact assessment (EIA) process outlined in section 9.5 of the plan provide for rigorous assessment of development proposals, and the Guidelines for EIA (2008) in place under the plan help to ensure protection of natural and cultural values.</p>
Darwin Bushwalking Club		
Section 4.1 Making decisions and working together (Board of Management)	<p>The Club is pleased that issue of camping permits is routine, as this should facilitate quick turnaround of applications.</p> <p>Control of feral animals such as buffalo should also be routine (see also 5.3.16 below).</p>	<p>No change to the plan. Supportive comment.</p>
Section 5.1 Looking after culture	<p>The Club is aware that there are some cultural sites near common bushwalking routes, and treats these with respect. It is hoped that any further route restrictions can be avoided.</p>	<p>No change to the plan.</p> <p>Covered by Action 5.1.15 (c) Installation of signage to indicate restricted areas. The Walking Strategy includes details about new and existing bushwalking routes and any proposed changes. This strategy was released for public comment early in 2015.</p>
Section 5.3 Managing park-wide threats affecting values	<p>Since the BTEC program in the 1970s, buffalo have been rarely seen by DBC members and only in fairly remote areas. In August 2014 however, a DBC group was shocked to find buffalo in the Monoliths pool. This suggests that buffalo are becoming more numerous and less fearful of humans. The Club advocates a “zero tolerance” policy towards buffalo in the stone country (as far as reasonably practical).</p>	<p>No change to the plan.</p> <p>Covered by Policies and Actions 5.3.9 to 5.3.16 to minimise the impacts of feral animals on park values. Action 5.3.16 is about control of feral animals where they present particular safety risks to people, particularly in key public visitation sites.</p>

Plan reference	Comments in the submissions	Response
Darwin Bushwalking Club		
Section 6.1 Destination and visitor experience development	As the new walking strategy is developed, the Club would welcome an opportunity to provide constructive comment.	No change to the plan. Commentary only. Some members of the Darwin Bushwalking Club have been involved in development of the walking strategy through positions held on the bushwalking steering committee and the club provided comments on the draft strategy when it was released for public comment.
Section 6.1 Destination and visitor experience development	The Club would very much welcome efforts to keep appropriate areas open as long as possible. Early in the season, walks are often closed because of concern about estuarine crocodiles. In some places, this is probably unavoidable – but in some cases a permit could be issued subject to specific conditions. For example, at Koolpin, it would be quite possible to park vehicles in the usual place, and walk up the upper Koolpin Creek while complying with a condition that walkers stay at least 50m (say) away from the creek and pools below the first waterfall. Late in the season, walks are often closed because of concern about hot conditions. As far as we are aware, the problems that have arisen relate to international visitors with inadequate skills and experience appropriate to the conditions. Club members have the capacity to walk safely in these conditions.	No change to the plan. Supportive comment. The plan commits to using best endeavours to ensure that public areas are open for as long as possible, particularly early in each year (Action 6.1.17). Action 6.1.10 provides for the development of a walking strategy and consideration of ways areas could be opened early and late in the season.
Section 6.3 Promotion and marketing	However, the Club prefers the statement in Policy 6.3.1 – safety should be “our concern, your responsibility”.	No change to the plan. Supportive comment.
Section 10.7 Recreational activities	The Club has found it increasingly difficult to book walking routes, even months in advance – which, given the huge area of Kakadu, seems ridiculous. It is rumoured that large interstate groups “block book” various routes – with no penalty for cancellation or simply failing to appear.	No change to the plan. Commentary only. The dry season, which is less than 6 months long, is the most popular and enjoyable time for bushwalking in Kakadu. Permits are only issued to two groups on any one route at any time to avoid crowding and help maintain the unique bushwalking experience. This means that some walking routes can be booked out at certain times. If a nominated route is not available, the permits officer is always available to suggest alternative routes or times. The walking strategy (Action 6.1.10) will consider some of the issues around bushwalking permits and the development of more walking routes.

Plan reference	Comments in the submissions	Response
Darwin Bushwalking Club		
Section 6.1 Destination and visitor experience development	As the new walking strategy is developed, the Club would welcome an opportunity to provide constructive comment.	No change to the plan. Commentary only. Some members of the Darwin Bushwalking Club have been involved in development of the walking strategy through positions held on the bushwalking steering committee and the club provided comments on the draft strategy when it was released for public comment.
Section 10.7 Recreational activities	An on-line permit application system might assist, and an on-line map of approved routes and campsites with information on availability would be an enormous help. More approved routes are also needed. A permit fee might discourage speculative booking.	No change to the plan. The park does not provide a map of approved routes and campsites on-line because overnight bushwalking, and bushwalking in remote and off-track areas in Kakadu presents a much higher level of risk to visitor safety than marked walks. These walks can be physically demanding and require a high level of navigation skills. By not advertising the routes, people are required to do their own research and talk to local clubs to find out about the routes. Applicants need to demonstrate they meet the required level of preparedness and skill before a permit can be issued. The walking strategy (Action 6.1.10) will consider the issues around bushwalking permits and the development of more walking routes.
Professor of Environmental Change Biology, University of Tasmania		
Section 9.10 Implementing and evaluating the plan	The key issue is having the appropriate staff to make the judgement calls working within the parameters of the POM. The trick is a sensible, timely and productive decisions and this can only be achieved by good staff, good advice and good leadership.	No change to the plan. Commentary only.
General comment	I have had a look at this POM and it seems to have the right balance. I looked at the Fire, Stone Country and Research sections in particular.	No change to the management plan necessary. Supportive comment.
Park Resident - (With long term association and history of living in the park)		
Section 1.1 A description of Kakadu National Park	Section 1.3: Second para, second line: 'including Aboriginal people living on the land'....This phrase 'including Aboriginal people living on the land' should be replaced with 'including Aboriginal traditional owners and colleagues living at settlements in the region'. This is an important change because such allusions are repeated in this document and many others produced by Parks, ERA et.al. and they sustain a fallacy of cultural continuity that stifles Park management in carrying out obligations given it when the Park was established.	No change to the plan. The connotations being made here demonstrate a lack of understanding of the joint management context the park operates in.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 1.1 A description of Kakadu National Park	The statement about Bininj/Mungguy and Park staff working hard to balance a number of competing value systems is just fantasy. Greater honesty about such things would protect the Plan and make it a more mature and less kindergarten-style document.	No change to the plan necessary. Balancing indigenous and western values systems is an ongoing part of joint management.
Section 1.1 A description of Kakadu National Park	The Values Statement then refers to the 'long and continuing history of Bininj/Mungguy custodianship of Kakadu'. In fact that history has been totally discontinuous. When and where there was no white activity, there was no Bininj/Mungguy presence.	No change to the plan necessary. There is clear evidence, particularly through artwork that has been scientifically dated and the presence of artefacts, that the Kakadu region has been continuously inhabited by Aboriginal people, long before the arrival of European settlers.
Section 1.4 Park values and local, regional, national and international significance	A definition of the term 'species' should be provided in the Glossary and interpretation Appendix.	No change to the plan. The definition of "species" is globally recognised and it is not necessary to include in the glossary of the plan.
Section 1.1 A description of Kakadu National Park	'a great diversity of native species, including many threatened species.' It should be: 'great diversity of native plant and animal species, including many that are threatened'.	No change to the plan. The text that this suggestion relates to is part of the values statement for the park which was workshopped with the Board. The suggested text has the same intent as the original text.
Section 1.1 A description of Kakadu National Park	Section 1.1: The third paragraph twice uses the word 'refuge'. This is wrong; it is habitat. See also comment on p.60.	No change to the plan. The use of the term "refuge" in this instance is used to reflect the stone country and shaded rainforest environments/habitats that provide refuge to vulnerable species.
Section 1.1 A description of Kakadu National Park	The rock art represents 'one of the longest historical records of any group of people in the world'. Darrell Lewis' work gives a four-stage chronology from the earliest rock art to today. The key features of each of the four stages, including an arid landscape until 16000 years ago, suggest a changing ecology possibly entailing a changing clan occupancy. In other words, the art may have been produced by different groups in different periods.	No change to the plan necessary. It is not possible to determine if there have been changes in clan groups over time. It is however accepted that the area has been inhabited by Aboriginal Australians over this period and the park accepts that the current traditional owners are Aboriginal Australians who had connections with Kakadu country long before the arrival of European settlement.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 1.1 A description of Kakadu National Park	<p>The original purposes of the Park are given as the preservation of the area in its natural condition, and the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. This statement of the original purposes of the Park shows that the Park has been hijacked. For example, Mudginberri and Munmalary were compulsorily acquired by the Government for incorporation into the Park. Almost none of those two properties are available for the 'appropriate use, appreciation and enjoyment of the area by the public'. There have been proposals, with some merit, for various areas. But when they closed off Jabiluka billabong for weed control, which was ineffective, it was never re-opened. Now that salvinia has spread throughout the South Alligator downstream from Yellow Water, continued closure of Jabiluka billabong contributes nothing to containment of the weed.</p>	<p>No change to the plan.</p> <p>It is correct that the park was declared for the preservation of the area in its natural condition, and the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public.</p> <p>Restrictions on access within the park are to ensure public safety and to protect the values of the park. These restrictions are reviewed regularly and through the precinct planning process. A review of fishing and boating in the park, including access, will be undertaken in accordance with Section 6.1.11 of the plan.</p>
Section 1.4 Park values and local, regional, national and international significance	<p>From beginning of section 1.4 to end of Rose quote on culture and country: Most people who have studied or closely associated with Aboriginal people from language-speaking communities understand and appreciate the basis of these statements and sentiments. They are often regurgitated at 'culture' meetings. However, as far back as the 1930s and 40s, Stanner recognised that Aboriginal behaviour could be at odds with these statements.</p> <p>Yet this Plan over 60-70 pages implies that there is an autonomous everyday Aboriginal presence on country in Kakadu. The fact is that, apart from half-day excursions by car and with modern fishing equipment, culturally-oriented bush living does not occur except from Town Camp and the Buffalo Farm.</p>	<p>No change to the plan.</p> <p>Many Bininj continue to live in the park and continue to practice traditional use of land. Some Bininj want more opportunities to be able to visit areas within the park and to spend time on country. This plan and activities in the park try to assist in meeting this aspiration. Ongoing efforts support the establishment of new living areas on country with modern facilities.</p>
Section 1.4 Park values and local, regional, national and international significance	<p>Values Statement: Kakadu 'has been home to Indigenous people for more than 50,000 years'. They are not the same people. There is no-one now living further than a stone's throw away from a bitumen road. The one genuinely bush outstation, Death Adder, has been long abandoned.</p> <p>The two original purposes of the Park are immediately followed by 'The park is first and foremost home to Bininj/Mungguy'. That statement contradicts the priority of those two original purposes.</p>	<p>Commentary only. No change to the plan.</p> <p>The traditional owners of the park are recognised as the decedents of the original inhabitants of the park. Many aboriginal people strive to establish living areas on country, and live a compromise between the lifestyles of their ancestors and modern society.</p> <p>The Commonwealth reserve "Kakadu National Park" was established under environmental legislation (currently the EPBC Act) for the purposes described in the values statement on page 11 of the draft plan, which dictates how the park will be managed, recognising first and foremost that the park is primarily owned by and is home to Bininj/Mungguy. As lessees of the land we are privileged to be on their land.</p>

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 1.4 Park values and local, regional, national and international significance	The land is leased 'to the Australian Government to be jointly managed as a national park to protect and manage its priceless natural and cultural heritage'. The government's refusal to provide adequate resources for management of the Park makes a mockery of this statement.	No change to the plan necessary. Section 367 of EPBC Act specifies the mandatory content for management plans for Commonwealth Reserves. Section 367 does not specify that a management plan for a Commonwealth Reserve include costing. The management plan does not set the funding available to undertake management actions. Funding allocations for the park are determined by Government and revenue raised by the Park. Alternative sources of funding for the park will be pursued through Section 9.8 (Revenue and business development).
Section 1.4 Park values and local, regional, national and international significance	Section 1.4: p.17: The Kakadu wetlands are not of great significance for Ramsar. There is only one significant migratory species that uses them, a curlew from Siberia. The waterfowl are not migratory.	No change to the plan necessary. The park is listed as a Wetland of International Importance under the Ramsar Convention and meets all nine of the listing criteria.
Section 4.2 Making decisions and working together (on country)	Section 4.2: p.39-40: These pages continue the endless belabouring of 'Bininj/Mungguy'. When will this document get around to managing the Park?	No change to the plan. Commentary only.
Section 5.1 Looking after culture	Section 5.1: p44: 'a powerful teaching tool for young Bininj/Mungguy': Statements like this illustrate the dishonest nature of this document. Exactly in what way does the rock art operate as a powerful teaching tool?	No change to the plan. Current park program relating to rock art encourage Bininj to talk with the younger generation about the art and any related stories.
Section 5.1 Looking after culture	Section 5.1: p44: 'Strong associations exist between these sites and their living traditions': There is no such strong association. Only at Cannon Hill did Bill Neidjie ever go and visit sites.	No change to the plan. Many people still have knowledge and a strong association with sites.
Section 5.1 Looking after culture	Section 5.1.1(c): p.45: Do not defer urgent work in order to hold meetings and engage consultants.	No change to the plan. Statement only.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 5.1 Looking after culture	Section 5.1.4: p.47-49: Instead of promoting Aborigines as always right and educating non-Aborigines in cultural matters, it should be recognised that the main shortcoming with Aboriginal people in their relations with tourists and the population of Jabiru is their failure to behave appropriately in a society in which people don't all know each other or what their skin relationship is to each other, and in which protocols exist that allow different groups that don't know each other to be in the same place eg. Jabiru supermarket	No change to the plan. Commentary only.
Section 5.1 Looking after culture	Section 5.1.3: p.46: The specialist rock art maintenance group should be able to utilise better-than-average dedicated work by Aboriginal people to make up a cross-cultural specialist group working together.	No change to the plan. Covered by Action 5.1.3 Assist Bininj/Mungguy to assess rock art sites and record cultural knowledge associated with them and Section 4 Joint Management.
Section 5.1 Looking after culture	Section 5.1.6(a): p.49: This kind of activity can be incidental to people working with each other, but seeking funding allocations to do this on a large scale is a waste of money.	No change to the plan. Commentary only.
Section 5.1 Looking after culture	Section 5.1: p.51-52: The walking routes being referred to are not traditional, they are post-contact.	No change to the plan. Untrue and Aboriginal people did walk all over the country before contact.
Section 5.1 Looking after culture	Section 5.1: p.51-52: The current Aboriginal perception of living in country is not traditional. It is visitation facilitated by vehicles from fixed points of occupancy.	No change to the plan. Commentary only.
Section 5.1 Looking after culture	Section 5.1: p.55: Nourlangie Camp is of far greater heritage significance than Munmalary and the money being spent on Munmalary should be spent there instead. Even Gougos' camp at Munmalary billabong is more important than the homestead.	No change to the plan. Parks Australia is obliged to look after Munmarlary as it is a declared heritage site under the NT Heritage Act.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 5.1 Looking after culture	Section 5.1: p.55: 'represent the struggle of Bininj/Mungguy to retain control of their country and their resilience in the face of unprecedented threats to their culture': This is a total misrepresentation of the history. Aborigines flocked to these sites of white contact, such as Nourlangie Timber Camp. They left their country for life in contact with settler outposts and towns. That continues today.	No change to the plan. Comment may be accurate for some but other Bininj may have a different point of view i.e. they engaged with Balanda to ensure that country was protected.
Section 5.3 Managing park-wide threats affecting values	Section 5.3: p.83 Feral animals: Fourth paragraph: Since 2008-9, 'most feral animal control programmes have focused on strategic areas of high risk rather than taking a park-wide approach, due to limited budgets': The most infested area in the northern part of the Park is Yellow Water, and that has been excluded from control programmes.	No change to the plan. Covered by Policies and Actions 5.3.9 to 5.3.16 to minimise the impacts of feral animals on park values.
Section 5.3 Managing park-wide threats affecting values	Section 5.3: p.88 Fire: Second paragraph, first sentence: This is a good summary statement.	No change to the plan. Supportive comment.
Section 5.3 Managing park-wide threats affecting values	Section 5.3: p.89 Fire: 'Each year numerous unplanned and unauthorised fires are ignited along the highways and in the park by people travelling through or using the park': No. There is too much burning done continuously along those roads by Park staff. It's a classic example of the Park fire policy minimising the impact of non-authorised fires. Roadside fires are of no consequence. Helicopter burning is the basic fire tool for the first half of the year, but to reduce big fires, ground ignition is then also necessary in between the helicopter burns. Helicopter fires are basic, but their problem is that because the helicopter has to be booked ahead, the weather on the day may not be suitable for a maximally effective burn. Ground fires on suitable days can compensate for this and also offer greater precision in placement of fires.	No change to the plan. Comment noted.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 5.3 Managing park-wide threats affecting values	Section 5.3: p.89 Fire: Fires entering the Park from boundary areas: If you have your own burning programme in order then neighbours' fires can't do any damage. A proper burning programme makes your country fireproof. You just keep burning.	No change to the plan. Fire management, including in park boundary areas is covered under Section 5.3 Fire and the Policies and Actions 5.3.17 to 5.3.27.
Section 5.3 Managing park-wide threats affecting values	Section 5.3: p.92 Climate Change: 'Predictions for 2030 indicate... sea-level rise of over 17 centimetres': This would destroy the wetlands. A rise of this magnitude could be handled by water management infrastructure at the Arnhem Highway on the South Alligator, so that the upper South Alligator would retain a relict wetland status for another 100 years.	No change to the plan. Covered under Section 5.3 Climate change and Policies and Actions 5.3.28 to 5.3.35 including implementing adaptation measures to maximise the resilience of Kakadu.
Section 5.3 Managing park-wide threats affecting values	Section 5.3: p.96 Land use: Recreational boating and fishing: see below, comment on pp.102-3. Parks' response to this problem should not have to be stimulated by Bininj/Mungguy concern. Their own monitoring should cause them to respond on their own initiative.	No change to the plan. Covered by Action 5.3.4 work with government agencies and/or research institutions to monitor the impacts of recreational fishing in the park.
Section 6.1 Destination and visitor experience development	Section 6.1: p.103: Recreational fishing and boating: We have a totally modern, artificial, non-wilderness activity of recreational line fishing and boat fishing. The generosity to high-powered boat use is outrageous if you look at the restrictions on other forms of activity. Use of quads is not allowed, hunting is not allowed, there are restrictions on bushwalkers, while boat users are given carte blanche on estuarine rivers.	No change to the plan. Covered by Section 10.7 specifies restrictions on boat use in the park.
Section 6.1 Destination and visitor experience development	Section 6.1: p.103: Management issues: 'Much of the park's visitor infrastructure is ageing, is in need of constant maintenance and needs refreshing': This should not be a management issue in a Plan of Management. Everything should be routinely maintained. Excellence should be assumed.	No change to the plan. The allocation of financial and human resources to the maintenance of infrastructure is necessary to maintain the image of the park to visitors and to ensure visitor safety.
Section 6.1 Destination and visitor experience development	Section 6.1: p.103: 'Falling visitor numbers have had an impact on park revenue and therefore ability to maintain facilities and services in the park': I don't see how. Most of that money goes to Aborigines.	No change to the plan. As per the Lease agreements for the park, an amount equal to 25% (Kakadu) / 0 (Jabiluka) / 13.8% (Gunlom) of receipts from any entrance and camping fees and other charges are paid to the traditional owners of the park. The balance of income goes towards the operation of the park.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 6.1 Destination and visitor experience development	Section 6.1.10: p.104: Day-walks and overnight walks are not enough. A north-south bushwalk is the fundamental thing for Kakadu. See comment on p.102. Bushwalking management is incredibly complex because you have a fire programme going on in the country through which people are walking. I have suggested in the past that walkers should pay a deposit for a daily check-in 'we're OK' beacon, with emergency signal at any time, with the deposit returned when the beacon is returned.	No change to the plan. Covered by Actions 6.1.7 and 6.1.10 where opportunities for more walking routes throughout the park will be considered in the walking strategy and through the precinct planning process.
Section 6.1 Destination and visitor experience development	Section 6.1.9: p.104: The Park looks tired.	No change to the plan. Covered by Action 6.1.9 Where appropriate, consideration will be given to support investment and upgrade opportunities for existing and new experiences within the facilities.
Section 6.1 Destination and visitor experience development	Section 6.1.9: p.104: A ranger needs to come with a high pressure pump and tank on their vehicle and blast clean any neglected ablution block in the district, and from then it should be cleaned every day. Contractors are too expensive. There should also be an inventory maintained of pressure-pack paint cans in all the colours of the ablution block walls, so that any graffiti is painted out as soon as discovered.	No change to the plan. Covered by the Section 6.1 outcome that visitors enjoy a range of quality experiences and facilities. These are reasonable suggestions that can be pursued without having to be explicit within the plan.
Section 6.1 Destination and visitor experience development	Section 6.1.17: p.105: This is a good thing to see in the Plan. (6.1.7 : Use best endeavours to ensure that public areas are open for as long as possible, particularly early in each year.)	No change to the plan. Supportive comment.
Section 9.01 Safety and incident management	Section 9.1: p.126: First paragraph: What chemical spills? The Ranger Mine is very well run. Any spills that did happen would be the responsibility of police and emergency services. It is not the Director's responsibility, and it shouldn't be mentioned here.	No change to the plan. Parks Australia and park users utilise a range of chemicals that may be hazardous to the environment including fuel, herbicides, detergents and other hazardous material that must be transported, stored and used in a safe manner. Parks Australia has a duty of care to ensure that any chemical spills in the park are responded to quickly to protect the environment, staff and the public.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 2.2 Management plan framework	In hindsight, observing the management of Kakadu since the early 1990s and increasingly since 2000, and appraising the management intentions of this 2014 Draft Management Plan, it would have been preferable if the first of the original Purposes of the Park had provided not only for the preservation of the area in its natural condition, but for its restoration as well.	No change to the plan. The park is managed in accordance with the IUCN protected area category II and the principles set down in Schedule 8 of the EPBC Regulations and listed in Appendix H (IUCN administrative and management principles). Section 5.3 of the plan provides for restoration of disturbed landscapes.
Section 4.1 Making decisions and working together (Board of Management)	Section 4.1: p.30: The list of obligations on the Director with respect to Bininj/Mungguy repeats things that have been said endlessly in the previous 29 pages. These repeated statements in the first sections of the Plan about Bininj/Mungguy could be greatly abbreviated. There are further reiterations in the following pages of these same points that have already been repeatedly made. It is almost as if the document does not really believe itself. It is like a proclamation of 'we want to believe this'.	No change to the plan. The introduction of the plan provides context about the joint management of the park and the planning process. Section 4 provides the specific policies and actions for joint management.
Section 4.2 Making decisions and working together (on country)	Section 4.2: p.37: This Plan will burden management with an indigenous employment policy that has demonstrably failed, including the proposed indigenous outsourcing contracts. These policies fail to admit the unavailability of most full-descent Aborigines for modern, permanent, OH&S-compliant employment.	No change to the plan. Action 4.2.6 provides for a number of mechanisms and options to try to engage as many Bininj/Mungguy as possible to implement the plan.
Section 5.1 Looking after culture	Section 5.1: p44: The 'Outcomes' in this section should be: All rock art sites in a general area are visited for the purposes of: 1. Photography for comparison with past and future visits, 2. Immediate removal of inflammable materials, and 3. Noting of any form of deterioration.	No change to the plan. Kakadu has a Rock Art Field Manual including data collection template that takes into account photo records, vegetation reduction and deterioration processes. Action 5.1.4 Maintain and update the park register of rock art sites, including information on the condition, conservation works and associated cultural knowledge.
Section 5.1 Looking after culture	Section 5.1.1(b): p.45: Eradication, not reduction, should be the aim, and it should be done regardless of whether pigs and buffalo threaten rock art or not.	Amended Action 5.1.1 (b) to clarify that eradication is difficult to undertake if the species remain in neighbouring areas.
Section 5.1 Looking after culture	Section 5.1: p45: There should be a twice-yearly patrol of escarpment areas to determine the presence of buffalo and pigs and to shoot any encountered. The cost of this would not be high compared to some of the other recurring expenses budgeted for in the Park.	No change to the plan. Feral animals are managed in accordance with the park's feral animal strategy (Action 5.3.12) by assessing risk and prioritising areas and species.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 5.1 Looking after culture	Section 5.1: p45: 'Loss of traditional knowledge' making management difficult: Loss of traditional knowledge is almost total. Nevertheless the necessary management tasks are clear: remove the risk of fire, shoot feral animals, treat white ants (see below). It has all been done before. Why did it stop? Why not keep doing it?	No change to the plan. Covered by Action 5.1.1 Develop and undertake a rock art conservation programme to address issues impacting on the condition of priority rock art sites.
Section 5.1 Looking after culture	Section 5.1: p45: Rock art sites open to visitation require some special training of seasonal rangers, who visit those sites almost daily during the dry season, to monitor them. The Commonwealth has a protective responsibility in all circumstances for major sites, such as the Djuwarr and Leichhardt sites in Death Adder, and in the process of carrying out that responsibility the Parks Service should also be attending to other sites in the same areas. For example, between Nauwalabila (the Lindner site) and Djuwarr and up Djuwarr gorge are sites with fragile recent X-ray art that requires every possible protection.	No change to the plan. Covered by Action 5.1.1 Develop and undertake a rock art conservation programme to address issues impacting on the condition of priority rock art sites. Rangers regularly receive training on rock art conservation and routinely monitor rock art sites.
Section 5.1 Looking after culture	Section 5.1: p45: 'Feral animals (highly significant)': Feral animals are not a highly significant threat and there is no reason why they should become highly significant.	No change to the plan. This matter is covered by Section 5.1 which identifies that pigs and buffalo can degrade rock art by rubbing up against it.
Section 5.1 Looking after culture	Section 5.1: p45: 'Number and inaccessibility of sites': The first thing to do is re-establish a rock art maintenance specialist group. In the past we had Ivan Haskovec and Hilary Sullivan. Contrary to views sometimes expressed in rock art circles today, it is clear from their work that fragile X-ray art can receive enormous benefit from strategically placed driplines. Despite 18 years of neglect those driplines have shown themselves to be durable. If there is a specialist rock art maintenance group (like the group that works on mimosa), and there are sites like the Koongarra habitation site where driplines can be shown to be effective, then those sites should be inspected for repair or upgrading requirements by that specialist group up to twice a year, in keeping with the sites' need for fire prevention.	No change to the plan. Covered by Action 5.1.1. Develop and undertake a rock art conservation programme to address issues impacting on the condition of priority rock art sites. This issue can be considered in implementation of An-garregen (cultural heritage) Strategy.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 5.1 Looking after culture	<p>Section 5.1.1: p.45:</p> <p>The first priority for the specialist work group should be to look at the variety of rock art sites and their special attributes. There are small sites that are unique, for example around the Koongarra Saddle and Djuwarr areas, containing motifs not seen elsewhere, such as the bull’s-eye type motif at one of the Koongarra Saddle sites. All known Thylacine and Tasmanian Devil sites should be protected against fire. X-ray motifs, for example at the Koongarra Saddle occupation site, will never survive long enough to develop their own protective silicon skins, as the heavily applied pigments are quickly obliterated by water washing and insect damage. They need a technology adequate to ensure permanent protection for good examples and for those motifs present in visitor sites. These X-ray motifs will not survive in the way some earlier styles such as mimi figures have over the long term by becoming embedded into the rock face. Darrell Lewis’ work suggests that the ochres used in X-ray art are different to those used in earlier art styles and, unlike those earlier materials, will not bond to the rock face.</p> <p>Sites that are central to the reason Kakadu was declared, such as the Balawurru site, should have hundreds of thousands of dollars spent on them if necessary to achieve excellence in curatorship.</p>	<p>No change to the plan.</p> <p>Covered by Action 5.1.1. Develop and undertake a rock art conservation programme to address issues impacting on the condition of priority rock art sites. This issue will also be considered in implementation of An-garregen (cultural heritage) Strategy.</p>
Section 5.1 Looking after culture	<p>Section 5.1.1(d): p.46:</p> <p>I don’t think this is a big deal. It is a matter of common sense. The main thing is to ensure a Park presence. The seasonal ranger staff should be given precise matters to check almost daily in their areas of work such as Ubirr and other places, and they should be briefed to assess visitor impact and recognise quickly when any vandalism, deliberate or accidental, has occurred. Kakadu has had plenty of good seasonal rangers.</p>	<p>No change to the plan.</p> <p>This matter is covered by the An-garregen (cultural heritage) Strategy and rock art conservation programme where rangers regularly receive training on rock art conservation and routinely monitor rock art sites.</p>

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 5.1 Looking after culture	Section 5.1.1(f): p.46: Get the experts to go back and think, and not say that it can't be done. Modern X-ray art is not enduring. We want to make some of it endure, because the qualities of this art style will never be replicated. The technology has to be developed. Get someone to come up with a permanent, non-damaging application which will protect the superimposed coarse ochres of the X-ray art without detracting from the protection of underlying deeply embedded older art under silicon skins which is almost always found under the X-ray paintings. So a conservation technology must be developed, if it doesn't exist now, to protect the integrity of a site from the basic earliest art to the fragile contemporary art.	No change to the plan. Covered by Action 5.1.1 and recommendation from An-garregen (cultural heritage) Strategy that the park will conduct a review of conservation works and technologies relating to rock art protection and undertake a rock art conservation program.
Section 5.1 Looking after culture	Section 5.1.4: p.46: This is fundamental and should be done yearly or twice yearly. An enormous period has elapsed since it was last done. It should also record any unique attributes, and whether contemporary or old.	No change to the plan. Supportive comment. Covered by Action 5.1.4 Maintain and update the park register of rock art sites.
Section 5.1 Looking after culture	Section 5.1: p.50: While the draft plan discusses other aquatic weeds, such as olive hymenachne and para grass, mimosa remains both the greatest threat and the only one for which a long-term zero-tolerance policy is possible, but such control measures have been forgotten.	No change to the plan. Covered by Section 5.3 and Action 5.3.4 to implement, review and update a park weed management strategy.
Section 5.1 Looking after culture	Section 5.1: p.50: Add to this section 5.1.10 (e): Aboriginal use of introduced technologies, such as fishing lines, firearms, boats and vehicles, to procure traditional foods in the bush, should be monitored and regulated to ensure that it does not entail detriment to the environment. Example 1: the discarding of synthetic fishing lines and fishing tackle can be lethal to non-target animal and fish species. Waterfowl, especially whistleducks which walk around on land adjacent to waterholes at certain times of year, can have their legs entangled or even amputated by lengths of fishing line that have been cut off and discarded around Aboriginal fishing areas.	No change to the plan. The Director cannot regulate traditional hunting or impose any restrictions on it but can encourage and promote sustainable customary harvest practices (Action 5.1.10).

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 5.1 Looking after culture	Section 5.1: p.54: In addition, the term Bininj/Munggyu includes everyone from people of full Aboriginal descent to those of predominantly non-Aboriginal descent with almost no identifiably Aboriginal physical features. This category introduces a distortion into our understanding of the history because it eliminates mixed-descent people as a separate category.	No change to plan. This matter is covered by the definition of Bininj/Munggyu on page ii of the plan.
Section 5.1 Looking after culture	Section 5.1: p.54: The text in this section on Historic Sites needs to reiterate the significance of Chinese in the lives of Aboriginal people. The stable connections for those Alligator Rivers people who lived in the region, from World War II until the declaration of the Park, was with Caucasians at Mudginberri and Oenpelli, and with Chinese people in Pine Creek. The nearest stable place and the most compelling trade relationship was with Chinese in Pine Creek. The Ah Toy connection is basic to the servicing of the Alligator Rivers region. Ah Toy is synonymous with Pine Creek, and there are still many people for whom Ah Toy's store was the centre of town. Prior to that there was also the Chinese timber mill at Nourlangie. This also makes the word 'Balanda' inappropriate in this document.	No change to the plan. Covered in Appendix F Glossary and interpretation. Balanda means non-Aboriginal people. The plan does not cover history of Chinese people in the region or details about Kakadu history-an overview of history can be found in other sources.
Section 5.1 Looking after culture	Section 10.6: p.168: The most common form of hunting apart from waterfowl is to shoot from vehicles along roads. If the road is a public road, that is illegal under the Firearms Act. That prohibition should be enforced.	No change to the plan. This matter is covered by Policy 10.6.1 which states that traditional use of areas in the park for hunting and food gathering may occur in accordance with law (e.g. NT firearms laws). Section 9.2 of the plan covers compliance and enforcement activities in the park which includes implementation of a compliance strategy. The strategy includes education and communication programs to improve awareness of the laws as well as compliance operations to detect such illegal behaviour wherever possible.
Section 5.1 Looking after culture	Section 5.1: p.51: Statements attributed to 'Traditional owner': statements for which no source is named can be mischievous. What standing does the person quoted have to make that statement?	No change to the plan. The quotes made on page 51 were made by traditional owners of the park who either cannot or prefer not to be named. The sentiments expressed in the quotes are long held views expressed by many traditional owners over time and are trusted to be a reflection of many elders of the park.
Section 5.2 Looking after country	Section 5.2: p.68 Floodplains: Artificial dams and levees were built in some places to replace and stabilise damaged levees but have not been maintained': They didn't need to be maintained.	No change to the plan. Artificial dams and levees constructed in the park have not been monitored. It is now known whether erosion has occurred or whether these structures require any maintenance to ensure their stability.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 5.2 Looking after country	Section 5.2: p.57: Paragraph 2: 'migratory species' should be 'migratory bird species'. The term 'species' should always be qualified.	No change to the plan. Not all migratory species are birds, saltwater crocodiles are listed migratory species.
Section 5.2 Looking after country	Section 5.2: p.60 Stone Country: 'Consequently, the stone country is one of Australia's most important sites for the conservation of endemic species, and appropriate management is essential for their survival'. Delete this sentence and replace with: 'The stone country provides a unique and restricted habitat for the evolution of a particular community of plant and animal species. If it is lost, they will be lost.'	No change to the plan. This matter is covered by the plan and the editorial suggestion does not add further meaning or clarity to the existing text.
Section 5.2 Looking after country	Section 5.2: p.60 Stone Country: The stone country is not a 'refuge area for biodiversity'. It provides a unique habitat for producing a specific kind of biodiversity. 'Refuge' is a patronising term that makes you feel sorry for animals. The stone country provides habitat where animals live, breed, die, fight, compete. 'refuge for species that cope poorly with fire': Replace with 'The stone country provides fire-free micro-habitats for animals that have not adapted to fire'.	No change to the plan. The use of the term "refuge" is used to reflect the stone country and rainforest environments/habitats that provide refuge to vulnerable species and is consistent with scientific advice.
Section 5.2 Looking after country	Section 5.2: p.60 Stone Country: Replace 'developed' with 'evolved'.	No change to the plan. Editorial suggestion that does not add further meaning or clarity to the management plan text.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 5.2 Looking after country	<p>Section 5.2: p.60 Stone Country: Paragraph beginning ‘In broad terms...’: Rewrite as follows: ‘The rugged stability of the stone country presents an outwardly unchanged pristine landscape, unlike other landscapes with a masking integument of vegetation or flooded swamps that is easily scarred by the modern impact of settlements and other intrusions. The vertical rock formations stand out over vegetation through much of the stone country and set the visual impact of this landscape. However the loss of the human megafauna occupancy for over 100 years has drastically changed fire regimes. Graveyards of dead Callitris (Anlarr) on areas of plateau attest to this.</p> <p>Ongoing observations on lower zone plant communities suggest the declines that may be occurring. The Arnhem Plateau Sandstone Shrubland Complex is a particular focus of concern. 30 or more plant and animal species associated with these communities participate in their decline. The largest Callitris communities are gone. Allosyncarpia (Anbinik), though secure in much hillside habitat, is losing ground to fire in flat glades and in communities below the escarpment.’</p>	<p>No change to the plan.</p> <p>The management plan adequately addresses the threats to stone country. Much of the comment is speculative.</p>
Section 5.2 Looking after country	<p>Section 5.2: p.60 Stone Country: ‘Many animals rely on these areas for refuge’: No they don’t, they just live there. All habitats are a ‘refuge’ for animal species inhabiting them. Why get sentimental over selected habitats?</p>	<p>No change to the plan.</p> <p>The use of the term "refuge" is used to reflect the stone country and rainforest environments/habitats that provide refuge for vulnerable species and is consistent with scientific advice.</p>
Section 5.2 Looking after country	<p>Section 5.2: p.60 Stone Country: Values and condition: ‘(restricted)’ should be ‘(restricted to stone country)’. Also, at the end of this paragraph about endemism, add: ‘There are a number of reptile species in the stone country that one would normally associate with arid desert landscape, which cannot live anywhere else.’</p>	<p>No change to the plan.</p> <p>Editorial suggestion that does not add further meaning or clarity to the management plan text. It would be incorrect to change the definition of endemic species as suggested.</p>
Section 5.2 Looking after country	<p>Actions: 5.2.2(c): ‘conducting survey and monitoring programmes for significant species’: This should be the first action, and it should be re-worded to: ‘conducting surveys of significant species for monitoring and reassessment of their population status’.</p> <p>But the important point is that if there has been an overall decline, the reason has not been identified.</p>	<p>No change to the plan.</p> <p>The reassessment of population status of surveyed species is not an action that the management plan needs to specify. It will be addressed through implementation of the threatened species strategy.</p>

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 5.2 Looking after country	Section 5.2: p.65 Floodplains: Outcomes: 'The abundance of significant species is increased (where possible and appropriate) or maintained': Replace with 'The actual abundance of plant and animal species in times of full Aboriginal occupation should be assessed and measured against the current abundance. Where necessary, management of some key species, eg. saltwater crocodiles, may have to be undertaken'.	No change to the plan. It may not be possible or appropriate to increase the abundance of significant species to times of Aboriginal occupation. Scientific experts have been engaged to assist in determining the outcomes for the natural values of the park and significant species will be managed through the implementation of specific management prescriptions and survey and monitoring programmes (Action 5.2.2).
Section 5.2 Looking after country	Section 5.2: p.65 Floodplains: Aboriginal people also limited the growth of paperbarks and other woodland trees by burning, and so created the open wetlands. Increased abundance of these plant species does not indicate a healthy wetland, it indicates a choked up wetland changing from grassland to scrubland.	No change to the plan. Very speculative. The matter raised is covered by the outcome which specifies that the abundance of significant species is increased (where possible and appropriate) or maintained
Section 5.2 Looking after country	Section 5.2: p.65 Floodplains: Last paragraph: See previous comments about the term 'refuge'. Also no mention of paperbarks or bamboo.	No change to the plan. The use of the term "refuge" is used to reflect the stone country and rainforest environments/habitats that provide refuge to vulnerable species and is consistent with scientific advice. It is not possible to identify all plant species found in each of the park's major landscapes.
Section 5.2 Looking after country	Section 5.2: p.66 Floodplains: Third paragraph: Aboriginal use of Kakadu is almost entirely on the wetland. And paperbark is a very important material for Aborigines.	No change to the plan. Editorial suggestion that does not add further meaning or clarity to the management plan text.
Section 5.2 Looking after country	Section 5.2: p.68 Floodplains: 'Illegal commercial fishing (moderately significant) and recreational fishing (low significance)': This is of high significance, because of its impact on saltwater crocodile behaviour. It creates intense competition between crocodiles for barramundi being retrieved on light tackle. It exposes individual crocodiles to lead poisoning from the regular ingestion of lures and sinkers containing lead. It also trains the crocodiles to be attracted to human presence on the wetland, thereby increasing the public safety risk. See comment on p.103. Also see Attachments.	No change to the plan. This matter is covered by Action 6.1.11 to undertake a review of the impact of fishing and boating in the park.
Section 5.2 Looking after country	Section 5.2: p.68 Floodplains: Another highly significant threat to wetland values comes from the use of lead shot by people hunting. See comment on p.50.	No change to the plan. Covered by Section 10.6 which describes lead shot as a major issue of concern and Policy 10.6.3 prohibits the use of lead shot in the park.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 5.2 Looking after country	Section 5.2.7(a): p.69 Floodplains: This needs to include the restoration of species totally depleted by buffalo which have not returned at an acceptable rate.	No change to the plan. This matter is covered by Action 5.2.7(b) re identification of other significant species and implementation of specific management prescriptions for these species.
Section 5.2 Looking after country	Section 5.2.8: p.69 Floodplains: Add to this: 'and the control of hunting practices on the wetlands, such as the use of lead shot'. Liaison should be carried out with the NT government to achieve a total ban on lead shot near wetlands.	No change to the plan. This matter is covered by Action 5.2.8. re working with relevant stakeholders
Section 5.2 Looking after country	Section 5.2.6: p.69 Floodplains: '5.2.6 Identify actions to limit the impact of saltwater intrusion in priority areas and implement them where practical and cost-effective': This is inadequate. It should read: 'Develop a 100-year defence against sea-level rise.' If the Arnhem Highway is to be kept viable, which will happen by raising the road level, that is the location for water management infrastructure to regulate outflow and tidal inflow under conditions of sea-level rise. See comment on pp.92-94.	No change to the plan. Covered by Policy 5.3.28 and Action 5.3.30 re the climate change strategy for the park which includes implementing adaptation measures to maximise the resilience of Kakadu.
Section 5.2 Looking after country	Section 5.2: p.71 Lowlands: First paragraph: 'large and frequent fires are leading to simplification of the woodland structure': I don't believe this. You would have to understand what the woodland structure was in order to make this comment.	No change to the plan. Current scientific advice is that an increase in fire intensity can lead to a decline in trees and shrubs (and simplification of woodland structure), resulting in a process called the 'grass-fire cycle'. To test if high-intensity grass fires were leading to increased numbers of tree deaths, the CDU team combined historic and current aerial photography of areas in the Darwin rural area, together with field surveys. They found that over 12 years there was a 50% reduction in tree canopy cover. This dramatic change in the structure of savanna vegetation demonstrates the serious risk that gamba grass and high intensity fire regimes poses to the savannas across northern Australia.
Section 5.2 Looking after country	Section 5.2: p.71 Lowlands: 'Cats (highly significant): While the extent of impact from cats on the lowlands fauna is not fully known, it is clear they are contributing to the decline of many species, especially small mammals': This is not true. And it is difficult to have an effective control programme when the distance between cats is so great.	No change to the plan. Current scientific evidence does not support this position.
Section 5.2 Looking after country	Section 5.2: p.71 Lowlands: Dogs, invasive ants, feral bees (low significance): Feral dogs interbreed with dingoes': This interbreeding is highly significant.	No change to the plan. Current scientific evidence does not support this position.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 5.2 Looking after country	Section 5.2: p.71 Lowlands: Feral herbivores (highly significant): The presence of pigs along the stream beds has been given very low priority in pig eradication work	No change to the plan. Covered by Action 5.2.12(b) which specifies management of pigs, horses, donkeys will occur in lowland areas of high density.
Section 5.2 Looking after country	Section 5.2: p.71 Lowlands: This paragraph should also mention that buffalo and cattle were previously eradicated under the BTEC programme.	No change to the plan. Editorial suggestion that does not add further meaning or clarity to the management plan text.
Section 5.2 Looking after country	Section 5.2: p.74 Rainforest: offers a marked ecosystem contrast to Kakadu’s spatially dominant landscape, the lowland woodlands, and contributes a set of very different species to the overall biota’: This could also be said about the riparian fringe – see below.	Amended the background text of Section 5.2 Rainforest to identify the dominant species found in the vegetation along creek and river channels.
Section 5.2 Looking after country	Section 5.2.14: p.75 Rainforest: ‘Manage feral animals in and around priority rainforest patches, prioritising a reduction in the impact of pigs and buffalo’: See previous comments regarding Hyptis suaveolens (p.74). Hyptis grows on disturbed ground, and even small numbers of buffalo or pigs will allow Hyptis to recolonise rainforest. If feral animals are removed, Hyptis disappears.	No change to the plan. Covered by Action 5.2.14 Manage feral animals in and around priority rainforest patches, prioritising a reduction in the impact of pigs and buffalo.
Section 5.2 Looking after country	Section 5.2.16: p.75 Rainforest: Manage weeds in and adjacent to priority rainforest patches, prioritising control of species that are contributing to increased intensity of fire on forest margins (e.g. para grass)’: Again, this ignores the threat of Hyptis suaveolens, and Cassia as well.	No change to the plan. Covered by Action 5.2.16 which does not preclude management of other weed species.
Section 5.3 Managing park- wide threats affecting values	Section 5.3: p.79-82: Weeds and Plant Pathogens: This section on weeds and plant pathogens does not address the spread of plants within Kakadu into areas that were not traditionally occupied by them because of the presence of Aboriginal people. A weed does not have to be an exotic species; it can be a native species growing where it is not wanted. This is a hugely significant problem on the floodplain. A measure of the success of any efforts to re-establish <i>Phragmites karka</i> to the extent it occupied in pre-contact times, which should be a goal of Park management, will be when Aboriginal people start burning it to control it.	No change to the plan. Covered by Action 5.3.5 which includes communication on the spread of weeds on vehicles, trailers and vessels. Policies and Actions 5.3.1 - 5.3.8 to minimise the impact of weeds on park values.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 5.3 Managing park-wide threats affecting values	Section 5.3: p.83 Feral animals: Outcomes: The impact of feral animals on park values is minimised': Add 'by getting rid of them'.	No change to the plan. Covered by Policies and Actions 5.3.9 to 5.3.16 to minimise the impacts of feral animals on park values. A park-wide feral animal control exercise was conducted in 2008–09 and since then most feral animal control programmes have focused on strategic areas of high risk rather than taking a park-wide approach, due to limited budgets.
Section 5.3 Managing park-wide threats affecting values	Section 5.3: p.83 Feral animals: Third paragraph, second-last line: replace 'significant reduction in numbers' with 'essential eradication of buffalo'.	No change to the plan. Covered by Policies and Actions 5.3.9 to 5.3.16 to minimise the impacts of feral animals on park values. Eradication of buffaloes is unfeasible.
Section 5.3 Managing park-wide threats affecting values	Section 5.3: p.83 Feral animals: This section needs a Table like the Weeds section.	No change to the plan. Covered by Action 5.3.12(b) where priority feral animals will be identified in the feral animal strategy.
Section 5.3 Managing park-wide threats affecting values	Section 5.3: p.84 Feral animals: Cats: Cats were only ever here in low numbers and they disappeared over 20 years ago, well before the arrival of cane toads. That fact is not recognised. There is no reason to want to control feral cats, but if it was attempted, the biggest problem would be their sparsity. It is also strange that the Plan repeatedly refers to the need for further research into the impact of cats, and yet assesses that impact as highly significant.	No change to the plan. Scientific advice has repeatedly indicated that cats are a significant threat to small mammals in the region. "Predation by feral cats" is a listed key threatening process under the Environment Protection and Biodiversity Conservation Act, with a threat abatement plan that prioritises management actions, particularly for Commonwealth and World Heritage areas.
Section 5.3 Managing park-wide threats affecting values	Section 5.3: p.85 Feral animals: Dogs: Dingoes need to be controlled. An elevated population of dingoes because of the availability of food for scavenging, such as at Jabiru dump, is totally undesirable. There should be zero tolerance for elevated dingo numbers around all communities and centres.	No change to the plan. Covered by Action 8.2.19 Take actions to control other feral animals, such as wild dog and dingo cross-breeds, cats, and buffaloes in the town, if not effectively controlled by Northern Territory Government agencies.
Section 5.3 Managing park-wide threats affecting values	Section 5.3.12: p.86 Feral animals: Why does the Plan talk about minimising the impact of buffalo when eradication is achievable?	No change to the plan. The eradication of buffalo within the park is unlikely due to the way in which the animals are dispersed within the park and the current traditional owner's desire and the Board position to maintain a small population for food. Neighbouring areas are also not free of buffaloes.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
<p>Section 5.3 Managing park-wide threats affecting values</p>	<p>Section 5.3: p.88 Fire: Last paragraph: There were huge fires on the plateau before the declaration of Kakadu. The current fire regime has never emulated the damage done by the pre-Kakadu fires, yet at the end of that period every animal species was still there. There may be a correlation between fire and the decline of some mammals, but that does not explain the decline. <i>Rattus tunneyi</i> thrives on fire in grassland and it has also disappeared. This animal can be used as a compelling indicator for the savannah, comparable to magpie geese on the wetlands. Its biomass was greater than that of all other small woodland mammals combined. In addition, some other species are starting to appear again. There was a big build-up of <i>Mesembriomys gouldi</i> when cane toads came and removed the quolls. <i>Rattus colletti</i> and <i>Melomys burtoni</i> also grew to plague proportions after cane toads came. All of these then disappeared, but <i>Mesembriomys</i> and <i>Melomys</i> have recently started reappearing.</p>	<p>No change to the plan. The matters and observations raised in this discussion are interesting and may be valuable when developing a citizen science database in the future. However, without scientific references to be able to support these comments, we are unable to include them in the management plan at this time.</p>
<p>Section 5.3 Managing park-wide threats affecting values</p>	<p>Section 5.3: p.88 Fire: Second sentence: ‘However, following the arrival of Balanda and the introduction of pastoralism, traditional patterns of burning country were severely disrupted and large, hot, destructive dry-season wildfires became more common’: Delete and replace with: ‘Wetland Aborigines were virtually wiped out by smallpox introduced by Macassans before or around 1860. (Smallpox was not introduced by Balanda as Macassans were identified differently.) Traditional burning therefore changed from that time. Settlers arrived a few years later, and surviving Aboriginal people increasingly left their homelands to go to contact areas and their traditional burning ceased over wide areas, such as the sandstone plateau section of Kakadu, with disastrous consequences for some widespread woodland species. The cessation of on-site burning by Aboriginal people, with no subsequent occupancy by any other group, resulted in huge fires coming from fringing areas almost annually and sweeping across flammable sections of the plateau. In particular, the destruction of <i>Callitris</i> on the plateau is a huge impact of uncontrolled fires before the declaration of Kakadu.’</p>	<p>No change to the plan. The plan is not the appropriate mechanism. The linkage between the impacts of disease on Aboriginal communities and their activities, cultural knowledge and practices is not documented.</p>

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 5.3 Managing park-wide threats affecting values	Section 5.3: p.90 Fire: Knowledge gaps: Wet season burning is questionable. The first thing noticeable after a heavy wet season burn is that nothing grows there and sand erosion occurs that changes the profile of the ground. This suggests that it was not a feature of traditional burning practice.	No change to the plan. Covered under Policies and Actions 5.3.17 to 5.3.26. Fire management in the park is under review. A fire management strategy is under preparation. This fire management strategy will be in accordance with the management plan. Key elements of this strategy will be to effectively engage Bininj and that adequate coordination and communication around fire management is occurring.
Section 5.3 Managing park-wide threats affecting values	Section 5.3.23: p.91 Fire: The Callitris forest around Nourlangie Camp (Anlarr) needs to be protected from fire by burning the fringe spear grass in the surrounding open woodland every year. There is a hot-fire grass perimeter around the forest that needs to be burnt into the paperbarks.	No change to the plan. Covered under Policies and Actions 5.3.17 to 5.3.26. Fire management in the park is under review. A fire management strategy is in preparation. This fire management strategy will be in accordance with the management plan. Key elements of this strategy will be to effectively engage Bininj and that adequate coordination and communication around fire management is occurring.
Section 5.3 Managing park-wide threats affecting values	Section 5.3: p.91-92 Fire: There are a number of plant species the ranges of which have been reduced by various impact factors and which will not be able to reoccupy their former range without intervention. If the Park is serious about restoring a traditional landscape, the necessary interventions should be implemented. One such species is Phragmites karka, a wetland vegetation removed by buffalo and which I began to reintroduce. With respect to actions to address the impact of fire, Callitris is a similar example. A massive management programme would be required in order to (i) ensure that the pathogen for Callitris, that is fire, is eliminated, and (ii) physically re-establish, by planting projects, core communities of plants from which the species could slowly disseminate into what was its full natural range under traditional Aboriginal occupation.	No change to the plan. Covered under Policies and Actions 5.3.17 to 5.3.26. Fire management in the park is under review. A fire management strategy is under preparation. This fire management strategy will be in accordance with the management plan. Key elements of this strategy will be to effectively engage Bininj and that adequate coordination and communication around fire management is occurring.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 5.3 Managing park-wide threats affecting values	<p>Section 5.3: p.92-94 Climate Change:</p> <p>The raising of the level of the Arnhem Highway on the South Alligator floodplain will need to be to the level that it currently is on the Adelaide River floodplain between the western side and Beatrice Hill, that is four to five metres. An even better example, given they were built better for permanent water management and for flood overflow, is the approaches to the Nourlangie Creek bridges. Raising the level of the Arnhem Highway will have to be done anyway to maintain the road, but it will also act as a levy. Then a standard barrage will need to be constructed, where water in high volume can be totally released downstream, and returning water can be regulated to prescribed volumes emulating pre-sea level rise upstream.</p>	<p>No change to the plan.</p> <p>Covered by Policy 5.3.27 and Action 5.3.29 implementation of a climate change strategy for the park.</p> <p>Agree that such a project is beyond the resources of the Park and that the park should work with the Australian and State Governments to establish and propose possible solutions to address saltwater intrusion and other impacts of climate change.</p>
Section 5.3 Managing park-wide threats affecting values	<p>Section 5.3: p.92-94 Climate Change:</p> <p>This section reflects an armchair assessment of climate change that does not recognise the urgency of addressing the primary impact on the wetlands. Saltwater will destroy them and transform them into a mangrove system. Parks need to bite the bullet on preserving a relict area of wetland through the coming decades of sea-level rise through water management. The only feasible point at which this can be done for the South Alligator wetlands is the Arnhem Highway, because that will be a focal point of road management which could be integrated with water management. Such a project is beyond the resources of the Park but it is the responsibility of the Park to make the importance of this threat known and to propose this solution. The water management of the South Alligator River to protect Park landscape for 100 years, which is a worthwhile goal if the Park is to continue to be a conservation area, would be a Park responsibility. It could also be done for Boggy Plain, the Magela and Coopers Creeks. Even if they set up a separate Authority for such projects, it would be for Park reasons, so it would come under the authority of the Director of Parks. It is a Park issue, and it should be addressed in this Plan.</p>	<p>No change to the plan.</p> <p>Covered by Policy 5.3.28 and Action 5.3.30 implementation of a climate change strategy for the park.</p> <p>Agree that such a project is beyond the resources of the Park and that the park should work with the Australian and State Governments to establish and propose possible solutions to combat saltwater intrusion and other impacts of climate change.</p>

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion	Section 6: p.99: Why does the tourism industry have any role when it is a public Park? The position of the tourism industry is overstated.	No change to the management plan. The management plan clearly aims to increase visitation in a sustainable way and provide opportunities for diverse and enriching visitor experiences (Section 6). As such it is important that the Director and the Board engage collaboratively and constructively with the tourism industry.
Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion	Section 6: p.98: The park has and will continue to look for ways to grow visitation, help and encourage visitors to enjoy Kakadu throughout all its seasons': As shown by the lack of provision for bushwalking, this is not true.	No change to the plan. Covered by Action 6.1.10 in consultation with Bininj/Mungguy, develop, implement and progressively review a strategy for walking in the park. The park will continue to work with Bininj/Mungguy to develop new and attractive opportunities for visitors to the park.
Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion	Section 6: p.98: Decline in visitation: Given the resource that the Park is, a more energetic management policy and emphasis on excellence in the visitor experience would improve visitation levels in the Park. And Park policy needs to stop qualifying everything with a requirement for Bininj/Mungguy participation when genuine interest in participating is probably non-existent.	No change to the plan. This matter is covered by Section 6 which commits to increasing visitation to the park in a sustainable way and provision of a range of quality experiences and facilities for visitors to enjoy. The park honours the commitments made within the park Lease to make available opportunities for Bininj/Mungguy and recognises that only a percentage of the community has a strong interest in participating in such programmes. All significant proposals need to be cleared by the Board and by the traditional owners of any site related to a proposal.
Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion	Section 6: p.98: There is no mention of the entrance fee. This should be removed at least in the wet season, if not altogether.	No change to the plan. Covered by Section 9.8 that discusses park use fees. These fees have been recently reviewed to enable a cheaper rate during the wet season. Other variations were also made to encourage visitation. Section 9.8 enables further reviews during the life of the plan.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 6.1 Destination and visitor experience development	Section 6.1: p.102: Bushwalking: 'Kakadu provides a range of opportunities that enable visitors to undertake day walks and overnight bushwalks': This is an insult to the bushwalking fraternity and to the Park. A north-south bushwalk should have been developed, incorporating day-walks with access points to get on and off the plateau.	No change to the plan. Covered by Actions 6.1.7 and 6.1.10 where opportunities for more walking routes throughout the park will be considered in the walking strategy and through the precinct planning process.
Section 6.1 Destination and visitor experience development	Section 6.1: p.103: It is clear that recreational fishing is feeding wildlife, which is prohibited in the Park. There is a very big need for the Park to examine what sort of fishing equipment is appropriate with respect to the issue of crocodiles eating dead barramundie with lead-containing fish hooks in them. A consequence may be tooth loss seen in otherwise healthy crocodiles. This needs research. See Attachments.	No change to the plan. Covered by Action 5.3.40 to monitor the impacts of recreational fishing and Action 6.1.11 to undertake a review of fishing and boating in the park to provide recommendations to the Board on future management options.
Section 6.1 Destination and visitor experience development	Section 6.1.13: p.104: Add to this: 'Review the use of fishing tackle with a view to reducing its impact on crocodiles.'	No change to the plan. Covered by Action 5.3.40 to monitor the impacts of recreational fishing and Action 6.1.11 to undertake a review of fishing and boating in the park to provide recommendations to the Board on future management options.
Section 6.1 Destination and visitor experience development	Section 6.1.2: p.104: Add a further policy item: Provide a rapid response capability to assist visitors in trouble, for example from crocodile attack, heat exhaustion, or falls.	No change to the plan. Covered by Section 9.1 safety and incident management which includes a process for rapid response to incidents.
Section 6.1 Destination and visitor experience development	Section 6.1.17: p.105: All actions in the Park should be directed towards getting the Park excellent and ready for visitors.	No change to the plan. Commentary only.
Section 6.1 Destination and visitor experience development	Section 6.1.15: p.105: The purpose of any such review should be to ensure that those fees are fair to visitors. The question of an entrance fee should be reviewed. There should be no entrance fee from October to May. The entrance fee is a rip-off if you are interested in wilderness appreciation because you get nothing in the wet season. Fishermen are largely exempt because they are mostly Territorians. Ideally, Park use fees should be scrapped.	No change to the plan. The management plan does not set or establish park entry fees.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 6.4 Visitor information	Section 5.1.14(c): p.53: The use of signage in the Park is haphazard and maintenance is poor. The use of signage for public information needs review.	No change to the management plan. Covered by Action 6.4.10 to continue to implement the park signage project, and review and update signage as needed.
Section 9.01 Safety and incident management	Section 9.1: p.126: Management issues: 'Cahill's Crossing on the East Alligator River is extremely hazardous': There should be a demountable footwalk installed at Cahill's Crossing, like the one at Twin Falls, and taken down each wet season.	No change to the plan. This suggestion will be considered as part of the precinct planning process (Action 6.1.7) for the East Alligator District.
Section 9.01 Safety and incident management	Section 9.1: p.127: Mobile phone coverage in the park is limited and needs to be improved': And public phone facilities should be considered.	No change to the plan. Action 9.1.12 is to work with government and non-government agencies and other stakeholders to improve mobile phone coverage in the park. Any measures to improve mobile phone coverage will be subject to the Environmental Impact Assessment process outlined in section 9.5 of the management plan. Public phones are available at a number of places throughout the park.
Section 9.01 Safety and incident management	Section 5.2: p.71 Lowlands: Add to this list of existing threats to values the following: 'Crocodiles: When saltwater crocodiles were wiped out by hunting, freshwater crocodiles invaded saltwater crocodile habitat. From the moment saltwater crocodiles were afforded effective protection, they re-invaded their former range, then they extended their range beyond what it had formerly been, into what was previously exclusively freshwater crocodile habitat. Human predators have gone, and pigs now provide a food source over the crocodiles' present expanded range. Saltwater crocodiles need management throughout their present range, not just for visitor protection.'	No change to the plan. Crocodiles are managed in accordance with the park's crocodile management strategy to minimise the risks of crocodiles to people while ensuring protection of the natural abundance of crocodile populations (Policy 9.1.4). The crocodile strategy is currently being updated and will review all the issues associated with crocodile management.
Section 9.04 Capital works and infrastructure	Section 9.4: p.127: Capital works and infrastructure: The priority building that has always been needed at Headquarters is a fireproof, concrete-block structure, with chemistry-laboratory quality fireproof switches, so that it provides a controlled atmosphere for photography, a secure location for firearms and significant Aboriginal artefacts, and secure storage for research materials. It is a fundamental requirement.	No change to the plan. Specific capital requirements do not need to be identified in the management plan and are considered as part of the capital works program.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 9.04 Capital works and infrastructure	Section 9.4.11: p.127: ‘Develop a Memorandum of Understanding (MoU) with the Northern Territory Government regarding the management of roads in the park and work with them to develop and implement a road management strategy for the park’: Before and after the wet, places like Nourlangie Creek crossing used to be popular. Now people are excluded, they can’t get down to the creeks, so they are using the bridges instead. It would be a relatively small job to widen the road, have low-level car parks for the dry season, high-level car parks for the wet, and put a walkway on each side of the bridge. If this is not done, it is only a matter of time before a car collides with pedestrians on one of the bridges. As I have argued in previous representations on this matter, the present situation is dangerous and this is a relatively simple remedy. Speed restrictions also need to be introduced for these bridges.	No change to the plan. The Kakadu Highway and other arterial roads in the park are the responsibility of the Northern Territory Government and not Parks Australia.
Section 9.06 Resource use in park operations	Section 9.6: p.140: Management issues: ‘naturally occurring contaminants including uranium, arsenic, radon and high salt levels’: Other materials such as fluorides are of greater significance than uranium.	No change to the plan. The statement re naturally occurring contaminants is not meant to be comprehensive but to provide an indication of some of impacts on groundwater.
Section 10.4 Access	Section 10.4: p.163: Road access: The Old Jim Jim Road should be closed through the Defence Department’s Mount Bunday area, subject to the upgrading of a Park road connecting the Arnhem Highway to the Kakadu Highway. From the Park end, the Old Jim Jim Road could remain open at least as far as Black Jungle Spring or perhaps to the Mount Bunday boundary. At present this is an unsupervised road used by pig hunters who bring weeds into the Park on their vehicles. The alternative upgraded road would run parallel to the west side of the South Alligator River, touching on various billabongs along its route. This would be widely appreciated by safari tourists and Darwin-based bush users.	No change to the plan. The Northern Territory Government is responsible for management of the Old Jim Jim Road, and at this stage there is no known intention to close the road.
Section 10.7 Recreational activities	Section 10.7.13: p.170: A stronger control of spotlighting than this is required. When an animal is momentarily blinded by spotlighting, its panic reaction will attract predators.	No change to the plan. This matter is covered by Policy 10.7.13 where visitors will be discouraged from disturbing native animals at night, for example by spotlighting.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
Section 10.7 Recreational activities	p.172-73: Recreational fishing and boating: The use of lures containing lead should be banned. Brass is an adequate substitute. See Attachments.	No change to the plan. This issue will be considered under the review of fishing and boating in the park (Action 6.1.11).
Appendices	Appendices p.199: Balanda: The definition given here needs to be discarded and the term itself should be omitted from the Plan. The extended definition is ridiculous and the word itself is unnecessary. The word balanda was introduced to the north coast of Arnhem Land and came to be used for any person of European descent. It did not include Malays or Chinese. It is no longer applicable in a society where the non-Aboriginal population is multi-cultural and includes many non-white people, especially many of the medical staff with whom Aboriginal people will often interact. The population of Jabiru includes many non-white non-Aboriginal people, and Asian visitation to the Park is high. Aboriginal contact with non-Aboriginal people is now multi-racial contact.	No change to the plan. The definition of the term Balanda is clear in that refers to all non-Aboriginal people.
Appendices	Appendices p.199: I think this Glossary and interpretation section should be placed instead at the start of the Plan. Given that the section gives some definitions that are at variance with ordinary correct usage, readers should be made aware of these from the outset.	No change to the plan. Definitions used in the Glossary and interpretation section are based on standard usage.
Appendices	Index p.246: Where a term listed in the Index is also listed in the Glossary, the first detail given for that term in the Index should be a reference to its definition in the Glossary.	No change to the plan. Unnecessary level of detail.

Plan reference	Comments in the submissions	Response
Park Resident - (With long term association and history of living in the park)		
General comment	<p>p.ii-iii and through plan:</p> <p>I strongly object to the use of the terms Bininj/Mungguy and Balanda as the only two relevant categories of people. The Chinese contact history with Aboriginal people goes back almost to the earliest phase of contact in this area. At one stage Chinese outnumbered Caucasians in the Darwin-Pine Creek region. Pine Creek was the stable external connection for the people in this area, and Chinese ventures in the Kakadu area were among the places that allowed people to live here. Balanda was a north coast word that was never applied to Macassans or Chinese, and its use on Cobourg in my experience was mostly restricted to when people were speaking in language. Use of the word Balanda in the Kakadu area is recent, and also misleading because it omits the important non-Caucasian dimensions of contact. One repeated theme in this Draft Plan is loss of knowledge. Use of the term Balanda contributes to this loss of knowledge. The word 'Balanda' was not a word of the buffalo country and carries a sneering implication in this area. See also comment on p.54.</p>	<p>No change to the plan. Covered in Appendix F Glossary where the terms are clearly defined.</p> <p>Bininj/Mungguy and Balanda are the terms that the Board has agreed to use in this plan and in the past. Balanda in this plan means any non-Aboriginal person or group of people, of any other race, creed or gender. It is not meant to exclude any person of any race or gender.</p>
General comment	<p>Section 6.4: p.110:</p> <p>'The park presents a significant opportunity to increase awareness and understanding of the oldest culture on earth': Statements to this effect, and other statements about Bininj/Mungguy cultural values, are made countless times in this Plan. Such repetition is not necessary, and makes the Plan unnecessarily lengthy. Removal of this repetition would make the text more in keeping with the nature of the Plan as a legal document.</p>	<p>No change to the plan. Some repetition in the plan is unavoidable because each section covers a primary issue which is also relevant to many of the other sections.</p>
Darwin resident 2 – Park user		
Section 6.1 Destination and visitor experience development	<p>Make a determined effort to remove crocodiles from the Twin Falls area to allow swimming. On two of our trips in the 1990s this was a magical experience – one of the highlights and it was obviously enjoyed by the many day visitors who were there.</p>	<p>No change to the plan.</p> <p>In 2004 the Board made a decision not to allow swimming in Twin Falls because park management could no longer guarantee 100% safety due to the crocodile risk.</p> <p>Crocodiles are managed in accordance with the park's crocodile management strategy which is currently being updated and will review all the issues associated with crocodile management.</p>
Section 6.1 Destination and visitor experience development	<p>To increase the appeal of the Park as a destination I would suggest...Seal the road leading to Gumlon.</p>	<p>No change to the plan.</p> <p>The NT government maintains the Gimbat Road and the park maintains the 11km Gunlom Road. Significant investment (~\$1m) went into resheeting the Gunlom Rd before it opened in 2015 but it is not economically viable to seal the road.</p>

Plan reference	Comments in the submissions	Response
Darwin resident 2 – Park user		
Section 6.3 Promotion and marketing	Have photographs of tourists enjoying the Twin Falls area included in advertising material.	No change to the plan. The plan is not the appropriate mechanism to make changes to the park advertising material. Photographs of tourists enjoying many places in the park are included in advertising material in accordance with the Shared Vision Principles and other key messages determined by the Board.
Section 6.3 Promotion and marketing	Also display in advertising material aerial photographs of the lower section of Cascade Creek, featuring its numerous beautiful pools, falls and cascades, which extend over about 600 metres, if possible with people enjoying the experience. All these wonderful features cannot be depicted in photographs taken from ground level. We have visited Cascade Creek on every trip. It is the absolute highlight.	No change to the plan. The plan is not the appropriate mechanism to make changes to the park advertising material. Photographs of tourists enjoying many places in the park are included in advertising material in accordance with the Shared Vision Principles and other key messages determined by the Board. Cascade Creek is a restricted area and a permit is required to access it. It is a four wheel drive track with no marked walking tracks or facilities. Permit applicants are required to demonstrate a minimum level of experience to ensure their own safety and it would not be appropriate to advertise the area to the wider public who are unlikely to be able to access it.
General comment	I consider that, judged by the standard of adherence to the Park's Purpose, either as originally formulated or amended as I suggest to provide for environmental restoration, present management is unacceptable and the proposed Draft Plan is unacceptable. This Draft is written largely to serve concerns of the Board of Management that are unrelated to advancing Park management objectives. It is not written as a pragmatic statement of management intent that will reassure 23 million Australians that the objects for which Kakadu was established are still seen as a responsibility to which the Federal Government is seriously committed and dedicated.	No change to the plan. As per the management plan, the purposes for which the park was established are: - the preservation of the area in its natural condition - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. The plan provides for these activities to occur and further details on how this will occur are available, or will be available, in management strategies. The park works with Bininj/Mungguy to incorporate traditional management concepts, to provide benefits to the Indigenous community including employment and business opportunities, to train them in current internationally used park management techniques, toward eventual sole management of the park by Bininj/Mungguy.
General comment	I have witnessed a plummeting quality of Park management since the 1990s. It has occurred also since the departures of the first Director Professor Derrick Ovington, Dan Gillespie, Andrew Skeat and much of their dedicated staff, as well as the research groups of the time.	No change to the plan. Commentary only.

Plan reference	Comments in the submissions	Response
Darwin resident 2 – Park user		
General comment	<p>p.iii Guiding principles: the progress and development of tourism are undertaken in accordance with the wishes of Bininj/Mungguy, and strong partnerships are maintained with the tourism industry’: serious bushwalking has never been encouraged. The bushwalking in Kakadu is token.</p> <p>I also don’t like the implication here that visitor use of Kakadu occurs within the tourism industry.</p>	<p>No change to the plan. Commentary only.</p> <p>Visitor use of the park occurs in accordance with the shared vision principles for respecting country and people in the development of tourism in 2005. The Board of Management adopted these principles to use as a guide to balance the primary importance of protecting Kakadu’s natural and cultural values with the development of a strategic approach to tourism.</p>
General comment	The draft management plan is a very comprehensive document and is to be commended, particularly for its emphasis on greater involvement for Aboriginal landholders and maintenance of the natural environment.	No change to the management plan necessary. Supportive comment.
Geoff Mosley		
Section 3. General provisions and IUCN category	<p>I submit that the plateau section of the national park be rezoned 'wilderness' as it was in earlier draft management plans for the National Park.</p> <p>This wilderness area is of international significance incorporating as it does some highly significant legacies of traditional land use.</p> <p>The rezoning would result in this part of the National Park qualifying for recognition under IUCN category 1b.</p> <p>The failure of the draft management plan to acknowledge the existence of this Outstanding Universal Value in the Park is an oversight which demands remedy.</p>	<p>No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan</p> <p>The category to which the park is assigned is guided by the purposes for which the park was declared. The <i>Environmental Reform (Consequential Provisions) Act 1999</i> deems the park to have been declared for the following purposes:</p> <ul style="list-style-type: none"> - the preservation of the area in its natural condition - the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public. <p>This is equivalent to IUCN category II - National Park.</p>
Environmental Systems Solutions		
Section 7.0 Research and knowledge management	The draft plan identifies several areas where data collection and reporting can be improved. It is pleasing to see that these tasks have been identified however they are being addressed independently and there doesn’t appear to be a coordinated attempt to get to the root of the problem that exists.	No change to the plan. Action 7.1.11 identifies the development, implementation and review of a knowledge management framework for data collection and reporting which will address the concerns raised in the comment.
Section 7.0 Research and knowledge management	The park collects and holds quite a bit of data relating to staff activities and landscape features, plant and animal species, site condition, historical events etc.. This material is stored all over the place and in different formats making it extremely difficult for staff to use this information when it is needed.	No change to the plan. Action 7.1.11 identifies the development, implementation and review of a knowledge management framework for data collection and reporting which will address the concerns raised in the comment.

Plan reference	Comments in the submissions	Response
Environmental Systems Solutions		
Section 7.0 Research and knowledge management	We believe that the new management plan provides the opportunity for KNP to deliver of a Data Management Strategy and Implementation Plan (DMSIP) – a well scoped, considered, standardised and logical approach for collecting, managing and utilising up to date information collected by staff and traditional owners. We believe that the data management related items within the draft document (shown in the table below) should be constrained and governed by this DMSIP.	No change to the plan. The proposed development of a data management strategy and implementation plan has merit, however there are numerous management strategies already listed in the plan. The development of a knowledge management framework (Action 7.1.11) will cover the issues raised.
Section 7.1 Research and knowledge management	<p>Persons carrying out research and monitoring under agreement with or permit from the Director must make data and results of research and monitoring available to the Director, including progress reports for longer-term research, in a specified format including plain English summaries for Bininj/Mungguy and staff. The Director may make such information available to park users and other interested parties.</p> <p>Not currently achievable</p> <p>Currently there are no standards in place for researchers to be able to do this. It is in KNP's best interest to devise the standards so that they can then prescribe to researchers how they want the data to come back and where KNP is going to put it. The effort going into collecting the data also needs to be justified. KNP needs to have a firm idea about what data is being collected and how they intend to store it and use it afterwards. Obviously KNP needs to have the standards and systems in place to be able to do this. This statement needs to refer to an overarching DMSIP as stated above.</p>	No change to the plan. The comment raises a number of valid points relating to Kakadu National Park having standards in place for the management of data and information. These issues will be managed through the development of the knowledge management framework, part of which includes the adoption of standards and protocols for managing data in the park.
Section 7.1 Research and knowledge management	KNP has limited resources to spend in this area [scheduling and prioritising works] so a system for prioritising work is essential. This aspect of the system to data has been underutilised because there is no overarching plan in place that demands this kind of work flow. This kind of methodology could easily be applied to other aspects of ranger work including fire, ferals and weeds. To our knowledge this has never been a serious consideration. We believe this a wasted opportunity for KNP that could potentially result in numerous benefits to the organisation and its staff. CIMS technology could play an integral part in delivering the DMSIP.	No change to the plan. Scheduling and prioritising work in the park will be undertaken according to the implementation schedule (Action 9.10.8) for the management plan and during planning meetings for weeds, feral animal and fire management.

Plan reference	Comments in the submissions	Response
Environmental Systems Solutions		
Section 7.1 Research and knowledge management	<p>Adoption of standards and protocols for managing ecological, biophysical, cultural and demographic data collected within the park.</p> <p>Agree but needs to be expanded</p> <p>This only one piece of the puzzle. Great to have standards but you also need systems for storing the data (that exist and could be tailored to fit), data model, data flows and firm ideas about how this data will be organised and utilised. A DMSIP would help to put some boundaries and perspective on this.</p>	<p>No change to the plan. These matters will be covered by the development of the knowledge management framework, part of which includes the adoption of standards and protocols for managing data in the park (Action 7.1.11).</p>
Section 10.12 Research and Monitoring activities and access to genetic resources	<p>Persons carrying out research and monitoring under agreement with or permit from the Director must make data and results of research and monitoring available to the Director, including progress reports for longer-term research, in a specified format including plain English summaries for Bininj/Mungguy and staff. The Director may make such information available to park users and other interested parties.</p> <p>Not currently achievable</p> <p>Currently there are no standards in place for researchers to be able to do this. It is in KNP's best interest to devise the standards so that they can then prescribe to researchers how they want the data to come back and where KNP is going to put it. The effort going into collecting the data also needs to be justified. KNP needs to have a firm idea about what data is being collected and how they intend to store it and use it afterwards. Obviously KNP needs to have the standards and systems in place to be able to do this. This statement needs to refer to an overarching DMSIP as stated above.</p>	<p>No change to the plan necessary.</p> <p>This matter is covered by Section 7.1 which includes the development of a knowledge management framework.</p>
Nedlands resident (WA), visitor and bushwalker		
Section 5.1 Looking after culture	<p>5.1.7 (b) replacement of Balanda place names with Bininj/Mungguy place names. If this is done, I think it would be good if the park website had something you could click to hear the names pronounced. Yellow Water Billabong is called Ngurrungurrudjba (Noor-roon-goo-rooj-bar) by the local people. I've copied the official phonetic pronunciation here but I've heard it pronounced and don't think the phonetic approximation does it justice.</p>	<p>No change to the plan.</p> <p>Covered by Actions 5.1.7 and 6.4.10 signage project and Aboriginal place names project. Pronunciation of place names could also be incorporated into the Bininj Gunwok language resources website.</p>

Plan reference	Comments in the submissions	Response
Nedlands resident (WA), visitor and bushwalker		
Section 6.1 Destination and visitor experience development	...bushwalking gets little mention despite the fact that those who walk n the park see a lot that can't be seen from the standard 4WD trips run by commercial operators.	No change to the plan. Covered by Action 6.1.10 to develop and implement a strategy for walking in the park.
Section 6.1 Destination and visitor experience development	6.1.10 "In consultation with Bininj/Mungguy, develop, implement and progressively review a strategy for walking in the park that provides for a range of day and overnight walking opportunities and describes prescribed walking routes and permit conditions." In principle, this sounds good. How it is applied in practice is another question.	No change to the plan. Commentary only.
Section 6.2 Commercial Tourism development and management	6.2.1 "Commercial tourism operators will be promoted and will be encouraged to provide new visitor experiences in the park consistent with Sections 6.1.17 and 6.1.18." I would like to think that this might mean that supervised groups might be allowed to go into areas which are currently out of bounds. That might eventually open more of the park to everyone.	No change to the plan. The potential for opening up new areas is considered through the Visitor Experience Planning /Precinct Planning process (Action 6.1.7). Discussions are currently underway with traditional owners about potential areas to allow greater access.
Section 9.03 Authorising and managing activities	9.3.4 "Review and, where possible, improve systems for the processing, administration and management of permits, licences and leases/subleases. This may include investigating the feasibility of developing an online system for self-generating permits and bookings for bushwalking..." This sounds wonderful but putting it into practice would be very difficult. Maps of approved routes would need to be made available and some way of ensuring that two groups weren't at the same campsite would have to go into the program. As it is this rarely happens and when you do end up with 2 groups at one location it is hardly a big deal.	No change to the plan. Commentary only. Online systems for managing permits will be explored under Section 9.3 and will only be implemented if it provides for an improvement to the existing system.
Section 10.4 Access	10.4 Access. In the background section of 'Road Access' it states, "Roads and tracks within the park will be maintained for as long as practicable into the wet season, and opened as soon as practicable after the wet season to provide residents and visitors access to the park." Commend this as it is very nerve racking waiting for permits to be issued when roads are still closed and you have buses/ air fares and hotels locked and loaded.	No change to the plan necessary. Supportive comment.

Plan reference	Comments in the submissions	Response
Nedlands resident (WA), visitor and bushwalker		
Section 10.4 Access	10.4.11 Permits may be issued for the landing, take-off and operation of aircraft in the park, following consultation with Bininj/Mungguy, for the following purposes: (d) commercial bushwalking tours or heli-touring ventures This could be a dream come true. Using them in the Wet when there is no one around would allow more than just the very fittest individuals to experience the best that Kakadu has to offer at that time of year.	No change to the plan necessary. Supportive comment.
Section 10.7 Recreational activities	10.7.4 Permits may be issued for overnight bushwalking activities using prescribed routes in the park, subject to a range of permit conditions that protect the health and safety of visitors and the natural and cultural values of the park. I think it is very important that [this] remains in the final...	No change to the plan necessary. Supportive comment.
Section 10.7 Recreational activities	10.7.5 Permits may be issued to light a fire in areas other than a fireplace provided by the Director when associated with other activities such as bushwalking. I think it is very important that [this] remains in the final...	Commentary only. No change to the plan necessary.
Section 10.7 Recreational activities	10.7.6 Bicycles may only be ridden on a vehicle access road or vehicle access track or a track for riding provided by the Director, and subject to any prohibitions or restrictions by the Director under Section 10.2 (General rules for managing use of the park). I think it is very important that [this] remains in the final... With luck this could...[give] us access to roads that are closed to vehicles.	No change to the plan necessary. Supportive comment.
General comment	It is a good plan...	No change to the management plan necessary. Supportive comment.
Humpty Doo resident 1 (long term park user and ex Kakadu ranger)		
Section 1.5 Joint management	In contrast to Kakadu's early decades, Parks Australia are increasingly failing to adequately engage with and work co-operatively with the local people.	No change to the plan. Section 4 of the plan clearly addresses these concerns. Parks Australia is working with land councils, indigenous organisations and representative groups and the Board of Management to determine how to improve engagement and benefits to the Indigenous community.

Plan reference	Comments in the submissions	Response
Humpty Doo resident 1 (long term park user and ex Kakadu ranger)		
Section 3. General provisions and IUCN category	(1) Parks Australia (PA) to set up an independent inquiry that can review the current Cat 2 status of Kakadu to determine the most appropriate category or combination of categories.	No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan. The Board considers that IUCN Category II National Park is not inconsistent with the management of activities in the park. However, the Board agreed that further consideration about zoning could occur during the development of the next management plan and this would allow wide consultation on the matter.
Section 3. General provisions and IUCN category	(3) The BOM revisits the zoning issue.	No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan. The Board considers that IUCN Category II National Park is not inconsistent with the management of activities in the park. However, the Board agreed that further consideration about zoning could occur during the development of the next management plan and this would allow wide consultation on the matter.
Section 3. General provisions and IUCN category	(2) Reconsider zoning for the park.	No change to the plan. The Board resolved that the park continue to be assigned to the IUCN category II – national park and the park should not be divided into zones by the management plan. The Board considers that IUCN Category II National Park is not inconsistent with the management of activities in the park. However, the Board agreed that further consideration about zoning could occur during the development of the next management plan and this would allow wide consultation on the matter.
Section 4.1 Making decisions and working together (Board of Management)	(4) Perhaps most importantly is the pressing need to realign relationships with the traditional owners and their associates. The future success or failure of Kakadu at all levels, hangs mainly on this function.	No change to the plan. Section 4 of the plan addresses these concerns. Parks Australia is working with land councils, indigenous organisations and representative groups and the Board of Management to determine how to improve engagement and benefits to the Indigenous community.
Section 4.2 Making decisions and working together (on country)	(3) Individual BOM members improve the effectiveness of reporting to their clan constituents.	No change to the plan. Actions 4.1.2 and 4.1.8. require regular governance training and production of a newsletter to support the Board and communication of key messages.

Plan reference	Comments in the submissions	Response
Humpty Doo resident 1 (long term park user and ex Kakadu ranger)		
Section 4.2 Making decisions and working together (on country)	(1) The BOM to adopt 'majority rule' decision-making.	No change to the plan. The Board prefer to use consensus but if this isn't reached the decision is made by a majority of Board members present and voting in line with the EPBC Regulations.
Section 4.2 Making decisions and working together (on country)	(2) The full minutes of BOM meetings to be posted on the Kakadu web site for public viewing.	No change to the plan. The Board resolved that it is not appropriate to publicly distribute the full minutes of the Board on the website and that the outcomes of Board meetings are adequately communicated through mechanisms such as periodic newsletters (Action 4.1.8).
Section 4.3 Bininj/Mungguy training and other opportunities	(2) New staff be vetted for work suitability and not retained if their performance is inadequate.	No change to the plan. The park operates under the Department of the Environment's staff performance assessment system. There are procedures in place through this system to address under performance.
Section 4.3 Bininj/Mungguy training and other opportunities	(1) All locally employed permanent staff be strongly urged to engage in staff exchanges with established parks in the southern states - as part of their professional development.	No change to the plan. Policy 4.3.1 provides for consideration of such development opportunities for Bininj/Mungguy park staff.
Section 5.1 Looking after culture	5.1.1 "Develop and undertake a rock art conservation programme to address issues impacting on the condition of priority rock art sites." Here is an idea to try out with regard to protecting rock art from insects and arachnids. There is a commercially available insecticide approved for use on organic farms in the NT called "Biflex AquaMax" made by FMC Australasia Pty Ltd. It can be used as an underground termite barrier, or a surface spray to deter termites, mosquitos, spiders and wasps.	No change to the plan. Details of insecticides is not necessary in the management plan and will be considered in the implementation of the rock art conservation program.
Section 5.1 Looking after culture	While recognising that the initiative for cultural conservation must come from Bininj, all reasonable assistance should be given by PA - but real outcomes need to be measurable - as noted in the Audit Report where it states: "improving monitoring and reporting to provide evidence-based measures of progress."	No change to the plan. The performance monitoring plan will describe which areas, sites, species and threats will be routinely monitored and the methods to be used for monitoring.

Plan reference	Comments in the submissions	Response
Humpty Doo resident 1 (long term park user and ex Kakadu ranger)		
Section 5.2 Looking after country	(1) That all parties be held responsible (accountable) for their action with regards to 'looking after country' activities. Annual fire meetings could be used as a venue for Balanda review of mistakes or failures and some sort of council of elders could be used to review Bininj mistakes or failures. In my experience, only the Balanda side of JM considers these things.	No change to the plan. The plan is not the appropriate mechanism. The primary responsibility for management of the park lies with the Director of National Parks. The Director works in partnership with Bininj, seeking their traditional knowledge, advice, input and leadership. Management activities are reviewed regularly and in different forums and include discussion of successes and failure and proposed future approaches.
Section 5.2 Looking after country	(2) Ongoing reviews of "looking after country" should be posted on the Kakadu web site.	No change to the plan. The plan is not the appropriate mechanism. Information about some major research projects undertaken in Kakadu National Park is publicly available on the park website or other websites such as the National Environmental Research Program (NERP). Information on performance monitoring in the park will be reported in the Director of National Park's annual report (Policy 9.10.7) which is available on the Parks Australia website.
Section 5.2 Looking after country	Immediately act to seek approval from TO's to find and capture Giant Skinks to create an 'insurance population' breeding colony at the Territory Wildlife Park - as agreed by the Kakadu BoM in November 2012. The breeding colony should be funded out of an expanded Project 4.	No change to the plan. The management plan is not the appropriate mechanism to vary the priorities of the threatened species strategy or funding priorities under the strategy. Agree that recommendations that have obtained Board approval should be progressed. The management plan does not need to be amended for this to occur.
Section 5.2 Looking after country	(1) Rejig the T S Strategy Projects by shifting money from Projects 2 and 3 - to boost the strength of Project 4.	No change to the plan. The management plan is not the appropriate mechanism to vary the priorities of the threatened species strategy or funding priorities under the strategy.
Section 5.2 Looking after country	(2) Ensure that all due effort is put in to determining the conservation status of Kakadu's data deficient and near threatened endemic and near endemic plants and animals. Not just the 'listed' threatened species. This could be built into the research priorities of the TSS.	No change to the plan. Covered by Policy 7.1.1 (b) of the draft plan: The priorities for research will be directed to: (b) fill the most important gaps in knowledge (those that most impede good management and achieving the objectives of this plan). Also covered by Action 5.2.2 (b) identification of other significant species (e.g. endemic species, key stone species, indicator species and culturally significant species) and implementation of specific management prescriptions for these species.

Plan reference	Comments in the submissions	Response
Humpty Doo resident 1 (long term park user and ex Kakadu ranger)		
Section 5.2 Looking after country	The definition of what a significant species is should be sharpened up in the final POM. The draft should also prioritise – i.e. give weighting to (in terms of management intervention) those species of most conservation significance, and explain why. This information can be lifted from the T S Strategy.	No change to the plan. The definition of significant species in the plan refers to listed threatened species, as well as species that are locally significant due to decline, cultural significance or as indicator species. This allows for flexibility in determining what is a significant species during the ten year life of the plan. The plan is not a prescriptive document or meant to be a reference document about all aspects of the park. The weighting of species of conservation significance appropriately appears in the Threatened Species Strategy and may alter during the life of the plan.
Section 5.2 Looking after country	(2) Page 64; “Weeds.” Should also be shown as “high” or at least “moderate significance”. Although not strictly a weed, native speargrass is a far greater threat to the vegetation of the stone country than exotic weeds at this time. Year by year, unusually hot fires fuelled by speargrass are eroding the fringes of many Allosyncarpia forests in Kakadu and in the west Arnhemland IPA. In some cases these fires are bringing down mature trees, which are hundreds of years old – as noted by Prof. Sam Sweet in his 2002 submission to the Kakadu Plan of Management.	No change to the plan. Covered by Action 5.2.1 that manages fire in the Stone Country to reduce the impact on plants, animals and habitats. The management of native spear grass in the park will be managed through the fire strategy. A number of potential weeds are described in the plan however weeds are currently considered a low threat to the stone country.
Section 5.2 Looking after country	(1) Page 64. “Knowledge gaps” should be changed to “Highly significant”. How can a park agency manage its “significant species” if – in the draft’s own words; “It is highly likely that the stone country harbors many species not yet described.” and; “Basic information about the population of many stone country species and the impact of current fire regimes and other potential threats is not available.”?	No change to the plan. Threatened species in the stone country will be managed in accordance with the threatened species strategy (Action 5.2.2). Improved knowledge of stone country biodiversity may improve our overall understanding of the values of the stone country and management of the threats but at this stage the opportunities for this are limited due to the difficulties of access and associated costs.
Section 5.3 Managing park-wide threats affecting values	(1) Maintain the Mimosa control program.	No change to the plan. The Mimosa control program will be identified as priority in the weed management strategy Actions 5.3.4.
Section 5.3 Managing park-wide threats affecting values	(2) Maintain the Grassy Weeds Team.	No change to the plan. The plan is not the appropriate mechanism to identify resources and staff structural arrangements. Grassy weeds are a very high priority for management as identified in Action 5.2.11.

Plan reference	Comments in the submissions	Response
Humpty Doo resident 1 (long term park user and ex Kakadu ranger)		
Section 5.3 Managing park-wide threats affecting values	Show date for cessation of “current management arrangements” for the Buffalo Farm. There should also be some description of the farm (including the combined length of the fence lines) and its management arrangements. There should be a statement indicating what would be involved in rehabilitating its cleared fence lines and tracks.	No change to the plan. Covered by Background text in Section 5.3 and Actions 5.3.13 (Cessation and rehabilitation) and 5.3.39 (rehabilitation works).
Section 5.3 Managing park-wide threats affecting values	(1) Place a high priority on further research into the ecological affects of Wet Season Burning. Carmor Plains (abutting Kakadu on its North West corner) has been using WSB exclusively for a number of years and has eliminated speargrass. I am informed that this property has very few dry season fires due to the absence of speargrass. As a result – in stark contrast to Kakadu – Carmor is teeming with wildlife.	No change to the plan. Covered by Policies 7.1.1 and Actions 7.1.9 to develop, implement and review a Research and Monitoring Strategy that identifies research and monitoring priorities. The park is also working with the Darwin Centre for Bushfire Research on the Three Parks Monitoring Programme and other research projects.
Section 5.3 Managing park-wide threats affecting values	The only landscape scale tool that has the power to shift the burning patterns in Kakadu - from unsustainable to sustainable - is Wet Season Burning (WSB). Fire management in Kakadu needs to swing the primary effort away from EDS burning to be progressively replaced by WSB. This initially needs to be done in the heads of park staff and local Bininj. Once the mindset is reframed it is possible to redirect actions on the ground.	No change to the plan. Covered by Policies and Actions 5.3.17 to 5.3.27 to actively manage fire to maintain park values. Fire management in the park is under review and a fire management strategy is under preparation.
Section 5.3 Managing park-wide threats affecting values	Progressively move away from the emphasis on traditional Aboriginal burning in policymaking, on-ground practices and publications.	No change to the plan. Covered by Policies and Actions 5.3.17 to 5.3.27 to actively manage fire to maintain park values. Fire management in the park is under review and a fire management strategy is under preparation.
Section 5.3 Managing park-wide threats affecting values	(2) District fire plans (pre-season and post-season) should be posted on the Kakadu web page.	No change to the plan. Covered by Policies and Actions 5.3.17 to 5.3.27 to actively manage fire to maintain park values. Fire management in the park is under review and a fire management strategy is under preparation.
Section 5.3 Managing park-wide threats affecting values	(4) Stop burning the Mt Hooper and West Alligator Head areas.	No change to the plan. Comment noted.
Section 6.1 Destination and visitor experience development	(1) That Kakadu does everything in its power to reinvent itself as a tourism destination. The emphasis should be on relaxing bureaucratic strangulation of tourism caused by over regulation.	No change to the plan. The Management Plan for the park is an enabling document. It allows activities to occur that would otherwise be restricted by the EPBC Act and Regulations.

Plan reference	Comments in the submissions	Response
Humpty Doo resident 1 (long term park user and ex Kakadu ranger)		
Section 6.1 Destination and visitor experience development	I have recorded 59 roads, tracks and destinations that have been closed to the public in Kakadu since 1979	No change to the plan. Commentary only. The current practice of managing access to the park is a result of recognition of the significance of the World Heritage values of the park and reflect best practice.
Section 6.1 Destination and visitor experience development	(3) That some of the destinations in Kakadu that used to be open for public enjoyment – be reopened and that imagery from these locations be used to displace some of the old and over used imagery of the big three destinations.	No change to the plan. The current practice of managing access to the park is a result of recognition of the significance of the World Heritage values of the park and reflect best practice. The potential for opening up new areas is considered through the Visitor Experience/ Precinct Planning process (Action 6.1.7).
Section 6.1 Destination and visitor experience development	Keep up, increase and diversify the “weeks”. (eg. Flower week, Bird week, T/S week)	No change to the plan. Covered by Section 6 that allows for and takes into account of other potential visitor activities.
Section 6.1 Destination and visitor experience development	(4) That Kakadu opens a number of new important destinations and new tourism products – both in-house (E.G. like the Seasonal Ranger Program) and commercially.	No change to the plan. Covered by Action 6.1.6 to review the Tourism Master Plan and implement its actions. New experiences and products will be considered in this process.
Section 6.1 Destination and visitor experience development	(5) Kakadu should develop tourism attraction and destination concepts and put them before the local Bininj associations with the view to helping them develop new products and the capacity to deliver them in completely new locations around the park.	No change to the plan. Covered by Action 6.1.6 to review the Tourism Master Plan and implement its actions. New experiences and products will be considered in this process and Bininj are asked to consider them through the precinct planning process (Action 6.1.7).
Section 6.1 Destination and visitor experience development	Here again I cannot help but feel that you are flogging a dead horse. Unless you have something major and new to offer – you are just rehashing the same meal over and over.	No change to the plan. Covered by Action 6.1.6 to review the Tourism Master Plan and implement its actions. New experiences and products will be considered in this process.
Section 6.2 Commercial tourism development and management	(2) That Kakadu examines its actions, laws and policies to determine if it is unintentionally contributing to the high cost of commercial tourism accommodation in the park.	No change to the plan. Covered by Action 6.1.15 that requires regular review of park use, facility and service fees, permit fees and lease/licence fees for visitor experiences to ensure that they reflect current market rates and appropriate contribution to the cost of delivery. This issue of high cost of commercial tourism accommodation (particularly during peak periods) applies across the Northern Territory due to the high cost of operating businesses in remote areas.
Plan reference	Comments in the submissions	Response

Humpty Doo resident 1 (long term park user and ex Kakadu ranger)		
Section 6.2 Commercial tourism development and management	(3) That Kakadu tries very hard to sound more welcoming to the tourism industry. While there is a shallow veneer of welcoming in the official media aimed at tourists, as soon as one scratches the surface, the heavy hand of excessive restriction and control appears. Please try to be more cheerful!	No change to the management plan. Covered by Policy 6.2.1 where Commercial tourism operators will be promoted and will be encouraged to provide new visitor experiences in the park consistent with actions 6.1.7 and 6.1.8.
Section 6.3 Promotion and marketing	(1) That Kakadu needs to get a better idea of where it sits in the region as a destination. Over inflated self-opinions are unhelpful in a fiercely competitive world. The overall impression that the POM gives in this area is one of an inwardly looking park, in denial of the existence of the outside world.	No change to the plan. Covered by Action 6.3.3 where the Director will work with stakeholder groups to develop and implement a cooperative promotion and marketing strategy. Section 9.7 recognises the regional context the park sits within and the need to work cooperatively with neighbouring areas, stakeholders and partners.
Section 6.3 Promotion and marketing	(2) That Kakadu re-orient its marketing and promotions back to primarily being about the nature of the Park.	No change to the plan. Covered by Action 6.3.3 where the Director will work with stakeholder groups to develop and implement a cooperative promotion and marketing strategy.
Section 6.3 Promotion and marketing	(2) Abolish the film and photo regime. It is illogical that film and photo crews are charged a fee so that they can advertise and promote the park. This is what most of them are doing though their work. How many film and photo crews come to Kakadu to do negative stories (apart from 'news of the day') or take negative images? None I would say.	No change to the plan. Covered by Action 6.3.4 where the park is developing guidelines to attract and assist commercial film makers and photographers work in the park.
Section 6.3 Promotion and marketing	Delete 6.3.5 from the POM as it is a negative statement with almost no practical application.	No change to the plan. Commentary only.
Section 6.3 Promotion and marketing	(1) Filming and photography for commercial advertising should be permitted for a fee, where it is not inconsistent with the parks values. E.G. I would see no problem with Kakadu being used as a backdrop for adverts for ice-cream – if it earns reasonable income for the park.	No change to the management plan. This example about use of photography for commercial purposes is allowable under the actions in the plan.
Section 6.4 Visitor information	(1) that Rangers actually clean the signs in their districts. (2) Maybe sign creation, manufacture and installation should be outsources to companies that are experienced in the field of signage. When metal signs are manufactured, the order should be for multiple copies so that they can be replaced over time. It does not cost as much to do 10 copies at the time of initial manufacture, in comparison to doing several - one offs - over time.	No change to the management plan. The park is working on replacing signage as per Action 6.4.10. Park staff routinely order multiple copies of commonly used signs (e.g. crocodile safety signage).

Plan reference	Comments in the submissions	Response
Humpty Doo resident 1 (long term park user and ex Kakadu ranger)		
Section 6.4 Visitor information	All Districts do a forensic review of all signs in their area to determine whether they are still valid. Redundant ones are to be removed.	No change to the management plan. Covered by Action 6.4.10 to continue to implement the park signage project, and review and update signage as needed.
Section 6.4 Visitor information	new signage must be balanced in its representation of the natural and cultural values of the park. Kakadu was made a WH property for both values, not just one.	No change to the management plan. Covered by Action 6.4.10 to continue to implement the park signage project, and review and update signage as needed.
Section 6.4 Visitor information	I would like to see some more detailed material made available on the site for interested people (in addition to tourists) including students and people with particular interests in archaeology, biodiversity conservation and so on. This could include posting some unedited reports on park management activities. I would like to see reports written by staff or consultants on management of fire, invasive species, rock art and threatened species conservation. An alternative to putting this on the Kakadu site would be to put a more emphasis on directing people to the Corporate site, which is also good. The minutes of Board of Management meetings should also be posted online.	No change to the management plan. The Board made the decision at the June Board meeting (2015) not to make Minutes from Board meetings public documents.
Section 6.4 Visitor information	How about listing, on the web site – all the reports that have been written on Kakadu going back to 1979 - which are gathering dust on shelves at the park HQ. Then, if people anywhere in the world want a copy – charge them a significant scanning fee and send it to them as a digital file. This could have several benefits: <ul style="list-style-type: none"> • Earn a bit of money for the park, • Resurrect the long dead – but still historically relevant reports and • Over time, the scanning of these reports would make them immediately accessible to park staff. Kakadu would have its own digital, online archive – paid for by outsiders – in an ideal world! 	No change to the management plan. The comment makes a valid suggestion which warrants consideration but this does not need to be explicitly stated in the plan. Action 6.4.4 covers providing up-to-date information to visitors using a variety of means including the website.
Section 7.1 Research and knowledge management	(3) Authors of newly released reports should give presentations on their finding to staff at ‘lunch time’ seminars. All relevant staff should be urged to attend and penalised if they don’t.	No change to the plan. Seminars about research undertaken in the park (e.g. through the National Environmental Research Program/National Environmental Science Program) are held periodically and staff are encouraged to attend.
Section 7.1 Research and knowledge management	(1) Act on the recommendations of scientists. Don’t just park their reports on shelves to gather dust	No change to the plan. Policy 7.1.6 covers the integration of research findings into park management, through the Parks Australia Management Effectiveness Framework.

Plan reference	Comments in the submissions	Response
Humpty Doo resident 1 (long term park user and ex Kakadu ranger)		
Section 8.1 Outstations and living on country	(1) Include in the plan more details concerning current and projected outstations. Once again, neither side of the JM arrangement is going to be happy no matter what the future holds. I feel for you.	No change to the plan. The number of outstations has remained relatively constant since the park was established but the projected number of outstations is unknown. Proposals for establishing new outstations will be assessed in accordance with Section 9.5 (Assessment of proposals) and managed according to the Outstations Guide to Development (2014) (Policy 8.1.3).
Section 9.03 Authorising and managing activities	that Section 7.1 “Research and knowledge management” and section 10.12, “Research and Monitoring Activities” be revisited with the view to making this aspect of Kakadu’s management more user-friendly, simpler and open to innovation.	No change to the plan. Under Action 9.3.4 the park is committed to reviewing and, where possible, improving systems for the processing, administration and management of permits.
Section 9.07 Neighbours, stakeholders and partnerships	(1) In my view the biggest threat to Kakadu is not environmental but political. It is going to be difficult for Kakadu’s managers and the BOM to steer Kakadu through the term of this current Federal government. Sadly, I fear that future governments won’t repair the damage being inflicted at present. It is for this reason that I urge, in the strongest possible terms, that Kakadu reaches outside of the park for funding sources and to enlist support from volunteers, clubs and associations. This could include a part ‘marriage’ with NGO conservation organisations such as the Australian Wildlife Conservancy.	No change to the plan. The declining resource base available to the Park for management activities is of concern, however the park does engage volunteers and volunteer organisations and will continue to do so as per Action 9.7.8 of the plan. The park will further develop and maintain good working relationships with park stakeholders, neighbours and other organisations and individuals who have an interest in the park in accordance with 9.7.1. These working relationships are described throughout the plan. Furthermore, in accordance with section 9.8 and 9.8.2, 9.8.2 the park will investigate and develop business plans for alternative funding and business arrangements that may provide income and resources to the park.
Section 10.4 Access	10.4.1 “Permits may be issued for the landing, take-of and operation of aircraft in the park, following consultation with Bininj/Mungguy, for the following purposes: (d) commercial bushwalking tours or heli-touring ventures.” I completely agree with this. It should be possible for bushwalkers to be airlifted to and from various points along walking tracks – particularly in the wet season when no other park users are inconvenienced. There are business opportunities here for mutually beneficial joint ventures between TO’s and bushwalking tour companies to work and walk together. Bushwalkers are probably the most responsible of all park visitors and those whose philosophical approach to the land is closest to that of the traditional owners. They should be looked after and fostered. Recommendation: Permit chopper landings in remote areas of the park to support bushwalkers and other legitimate park use activities.	No change to the plan necessary. This matter is covered by Policy 10.4.11 which allows for permits to be issued for the landing, take-off and operation of aircraft in the park, following consultation with Bininj/Mungguy, for the following purposes: (h) other purposes as approved by the Board.

Plan reference	Comments in the submissions	Response
Humpty Doo resident 1 (long term park user and ex Kakadu ranger)		
Section 10.9 Filming and photography (and other commercial image capture)	(2) Control and permit commercial filming and photography for advertising. E.g. Advertising of new 4 W Drives where the imagery is consistent with park values.	No change to the plan. This issue will be considered in the development of the guidelines for this commercial activity (see Action 6.3.4).
Section 10.9 Filming and photography (and other commercial image capture)	(1) Abolish, or at least severely curtail the archaic commercial film and photography regime. The sky will not fall.	No change to the plan. This issue will be considered in the development of the guidelines for this commercial activity (see Action 6.3.4).
Section 10.5 Commercial use of resources	I am familiar with the only commercial taking of fish for the aquarium industry from Kakadu. That proposal was for the taking of 25 pairs of locally common, but endemic fish, for the purpose of breeding them in captivity in Darwin and selling the offspring into the aquarium trade. The landowners are paid 10% of farm gate sales. This project results in a 'triple bottom line' benefit.	Commentary only. No change to the plan necessary.
General comment	(2) PA employs dedicated and trained natural and cultural professionals to ensure the protection of the park's WH values. In the absence of these the park should hand over all responsibility of these functions to expert external authorities.	No change to the plan. Commentary only.
General comment	(3) I suggest that a campaign to have Kakadu listed as a W H property In Danger could be a very good thing for Kakadu. It could bring much needed financial relief in the form of restored funding from Canberra. It is clear to me that it is the government itself that is pushing Kakadu into the 'In Danger' category and it is therefore only the government that can keep the park out of that category – by adequately funding it.	No change to the plan. Commentary only. The management plan does not set the funding available to undertake management actions. Funding allocations for the park are determined by Government and revenue raised by the Park. Alternative sources of funding for the park will be pursued through Section 9.8 (Revenue and business development).

Plan reference	Comments in the submissions	Response
Humpty Doo resident 1 (long term park user and ex Kakadu ranger)		
General comment	<p>(2) Another important threat to the future of Kakadu lies in what I see as excessive bureaucratisation. The surge of red tape that I have observed in the past 2 decades and which is evident throughout the POM, points to a lack of balance, a lack of reality even, in the way the park is managed. I believe that Kakadu is already suffering a form of managerial auto-paralysis, brought on by its often-overwrought management prescriptions. Sadly I have no recommendation on how to solve this. It would be an interesting exercise to draw a graph showing the growth of excess managerial detail - from 20 years ago to the present time – then extrapolate into the future. I think the graph would be disturbing to see. Among the most unused tools in the Kakadu toolbox are innovation and creativity. Now that the budget has shrunk, it is these approaches to management that will likely hold the key to future successes. But it is almost impossible to see innovation or creativity being able to break through the crushing weight of bureaucratisation of Kakadu’s management structures and policies.</p>	<p>No change to the plan.</p> <p>The Director of National Parks needs to be accountable for spending public money, management activities, management of risk and needs to respond to higher volumes of requests for information and assistance.</p> <p>Parks Australia has been and will continue to review its operations to improve management of the park, to be more innovative in the way that we do things and to improve the delivery of the range of services that we provide. Section 9.3 provides an example of this where we will review and, where possible, improve systems for the processing, administration and management of permits, licences and leases/subleases (Action 9.3.4).</p>
General comment	<p>(4) PA (or the Federal Minister on advice from PA) to invite the IUCN W H Commission to carry out a frank and fearless examination of Kakadu’s current “Significant Concern” status to see if Kakadu is in fact a property “In Danger”.</p>	<p>No change to the plan. Commentary only.</p> <p>The Director of the world heritage program for the IUCN recently stated that he had concerns about the long-term prospects for Kakadu unless there was more work done to tackle a range of threats. But he also said Parks Australia was not to blame for the problems: "In the case of Kakadu... the management has been highly effectively done. It's clear that there are threats that are still not being addressed..... it's really this high quality monitoring that has enabled us to be sure that there is a problem that's been identified."</p> <p>Parks Australia has recently secured significant funding to address invasive species in the park, to reduce pressures on threatened species.</p>

Plan reference	Comments in the submissions	Response
Humpty Doo resident 1 (long term park user and ex Kakadu ranger)		
General comment	in terms of conservation of plants and animals in Kakadu, PA to sort out its understanding of the PP [Precautionary Principle] and ensure that it is front and centre within the POM. It should be enshrined within the T S Strategy.	<p>No change to the plan.</p> <p>The Board and the Director of National Park recognises that the application of the precautionary principle is necessary when caring for the cultural and natural resources within a protected area and to ensure human health and safety for those within the park. The Australian IUCN administrative and management principles include the application of the precautionary principle to prevent degradation of the natural and cultural heritage of a reserve.</p> <p>Parks Australia is risk averse and will take all achievable measures to negate risks within the park, to visitors and to the natural and cultural values of the park. In the absence of scientific evidence, some of the work undertaken in the park is based on previous experience and staff knowledge that the action will make a difference.</p>
General comment	(1) that adequate funding is allocated to implementing the Threatened Species Strategy.	<p>No change to the plan necessary.</p> <p>The plan is not the appropriate mechanism to allocate funding to individual management programmes. Section 367 of EPBC Act specifies the mandatory content for management plans for Commonwealth Reserves. Section 367 does not specify that a management plan for a Commonwealth Reserve include costing.</p> <p>The management plan does not set the funding available to undertake management actions. Funding allocations for the park are determined by Government and revenue raised by the Park. Alternative sources of funding for the park will be pursued through Section 9.8 (Revenue and business development).</p>
Gundjehmi Aboriginal Corporation		
Section 4.1 Making decisions and working together (Board of Management)	Section 4.1: The recommendations of the Technical Audit are not reflected in the Draft Plan. The performance indicators are now restricted to Board processes and do not refer to Bininj satisfaction.	<p>No change to the plan.</p> <p>In response to the recommendations of the Technical Audit of the fifth plan considerable work has been invested in developing explicit and measureable performance indicators for the sixth plan. There are many issues associated with using "satisfaction" as an indicator and this plan has moved away from using qualitative indicators.</p>
Section 4.1 Making decisions and working together (Board of Management)	Table 3 of the Draft Plan confirms that there is a very restricted participation of Bininj traditional owners in both routine and non-routine actions. Whilst the Table provides for consultation of Bininj/Mungguy, there is no evidence that any such consultation has occurred as confirmed by the Technical Audit.	<p>No change to the plan.</p> <p>Bininj/Mungguy are consulted on routine and non-routine actions in accordance with Board/NLC consultation guidelines approved by the Board.</p>

Plan reference	Comments in the submissions	Response
Gundjehmi Aboriginal Corporation		
Section 4.1 Making decisions and working together (Board of Management)	One important structural issue, above all others, requires a radical rethink in light of this cultural reality in Kakadu – clan representation to the Board and intra-clan communication. Plainly put, the quasi-democratic representation model of appointments to the Board and the assumed community engagement model between clan representatives on the Board and the broader Bininj/Mungguy community are alien to Bininj/Mungguy life in the Park. This is reflected in broader criticisms of Parks’ performance by the Bininj/Mungguy community and the fact that some provisions of the Draft Plan, such as fire management, run directly counter to ongoing and widely known plans of the broader Bininj/Mungguy community.	No change to the plan. Section 4 of the plan clearly addresses these concerns. Parks Australia is undertaking a review of joint management and is working with land councils, indigenous organisations and representative groups and the Board of Management to determine how to improve engagement.
Section 4.1 Making decisions and working together (Board of Management)	This oversight and the aforementioned ‘cultural dissonance’ and consequential Bininj/Mungguy disengagement undermine the entirety of section, 5.1 Looking after Culture.	No change to the plan. Section 4 of the plan clearly addresses these concerns. Parks Australia is undertaking a review of joint management and is working with land councils, indigenous organisations and representative groups and the Board of Management to determine how to improve engagement.
Section 4.1 Making decisions and working together (Board of Management)	The infrequent participation of senior Mirarr traditional owners in the proceedings of the Board, for example, is indicative of their sense of disconnect and powerlessness with respect to the proceedings of the Board and the operations of the Park. Along with other senior Bininj/Mungguy in KNP, Mirarr often prefer their deliberations to occur in a forum entirely separate and removed from the bureaucratic constraints of the Board. Any genuine attempt to enhance Bininj participation in the future operation of the Park must include a reconsideration of the manner and content of the Australian Government’s liaison with Bininj/Mungguy. Some suggestions as to how to provide for this are given below.	No change to the plan. Section 4 of the plan clearly addresses these concerns. Parks Australia is working with land councils, indigenous organisations and representative groups and the Board of Management to determine how to improve engagement and benefits to the Indigenous community.

Plan reference	Comments in the submissions	Response
Gundjehmi Aboriginal Corporation		
Section 4.1 Making decisions and working together (Board of Management)	In order to address these issues and provide for consistent Bininj/Mungguy engagement in the decision-making and operations of the Park, a new approach to Aboriginal engagement is required. The GAC calls on the Australian Government, within the first two years of the life of the 6th Plan of Management, to fund and commence a thorough and community-wide review of joint management in partnership with Bininj/Mungguy, working closely with Aboriginal representative organisations (including the Northern Land Council) where appropriate and deliberating on a wide range of issues, including review of relevant leases, recognition of indigenous rights and protocols, and regional Aboriginal socioeconomic development. Outside the Draft Plan and any written record a 'Joint Management Futures Project' is being planned by Park authorities. It is telling that this Corporation knows nothing of that project, having not been formally advised of it or invited to be involved in any way whatsoever.	No change to the plan. Section 4 of the plan clearly addresses these concerns. Parks Australia is working with land councils, indigenous organisations and representative groups and the Board of Management to determine how to improve engagement and benefits to the Indigenous community.
Section 4.2 Making decisions and working together (on country)	There is no provision anywhere in the Draft Plan for the Director and staff to maintain an accurate record of the traditional owners with authority with respect to land and Aboriginal cultural heritage. 3 This needs to be changed urgently. The information is available from the Northern Land Council, Djabulukgu Association, Gagudju Association, Gundjehmi Aboriginal Corporation, Jawoyn Association and the Aboriginal Areas Protection Authority. It can be kept confidential and used for guidance in matters requiring critical direction from the appropriate Bininj/Mungguy.	No change to the plan. This matter is covered by Table 3 which states that Bininj/Mungguy are consulted where necessary and in accordance with Board/NLC consultation guidelines
Section 4.2 Making decisions and working together (on country)	At 4.2.1, the Draft Plan provides that where traditional ownership of an area is unclear, consultation will occur with all relevant Bininj/Mungguy. The Director and his staff have demonstrated no capacity to act where traditional ownership is clear and have adopted a practice of consulting a broad range of Aboriginal persons regardless of their status. This undermines the authority of the senior Bininj/Mungguy and encourages senior Bininj to disengage from consultations conducted on an improper basis.	No change to the plan. This matter is covered by Table 3 which states that Bininj/Mungguy are consulted where necessary and in accordance with Board/NLC consultation guidelines

Plan reference	Comments in the submissions	Response
Gundjehmi Aboriginal Corporation		
Section 4.2 Making decisions and working together (on country)	There is much in the Draft Plan that may rejuvenate tourism in the Park, providing demonstrable socio-economic benefit to Bininj/Munggyu associated with the tourism industry or otherwise deriving benefit from increased visitation and/or visitor spending. The issue, however, is how these aspirations will be driven to realisation. The GAC suggests that the existing model (marked by committees and industry appointees within bureaucratic management) will not deliver the outcomes.	No change to the plan. Section 4 of the plan clearly addresses these concerns. Parks Australia is working with the land council, indigenous organisations and representative groups and the Board of Management to determine how to improve engagement and benefits to the Indigenous community.
Section 4.2 Making decisions and working together (on country)	There is insufficient evidence of engagement with the primary Bininj/Munggyu and the engagement appears to be almost exclusively limited to the bureaucratic process of formal meetings of the Board of Management and occasional consultation. This is causing an increasing disengagement of Bininj/Munggyu, undermining the integrity of joint management and contradicting the lease obligations. The root of the problem lies in the 'cultural dissonance' between the bureaucratic application of the customary Euro-Australian wildlife management model by government and the traditionally-oriented holistic values and practice of Bininj/Munggyu. Problems of communication, as well as fundamental differences in notions of being and knowledge, compound this 'dissonance'.	No change to the plan. Section 4 of the plan clearly addresses these concerns. Parks Australia is working with the land council, indigenous organisations and representative groups and the Board of Management to determine how to improve engagement and benefits to the Indigenous community.
Section 4.2 Making decisions and working together (on country)	Implementation of the previous Plan of Management was unsatisfactory and there is nothing in the current Draft that addresses how an improvement in effective implementation will be achieved. A critical cornerstone of any implementation plan would be an assessment and adoption of ways of improving Bininj/Munggyu agency and engagement in decision-making on substantive policy and operational issues.	No change to the plan. Section 4 of the plan clearly addresses these concerns. Parks Australia is working with land councils, indigenous organisations and representative groups and the Board of Management to determine how to improve engagement and benefits to the Indigenous community. Section 4.2 includes a number of policies and actions which aim to try and improve Bininj/Munggyu engagement in decision-making and implementation of the plan.
Section 4.2 Making decisions and working together (on country)	It is unclear how the performance indicator at 4.2 will be measured – "Opportunities for Bininj/Munggyu involvement in park decision-making, planning and implementing work programmes." The section refers to consultations and community meetings. Mirarr have not observed any such effective activity by Parks staff, although existing approaches may with NGO input provide an avenue to genuine inclusion.	No change to the plan. Under Action 9.10.9 a performance monitoring plan will be prepared and will provide further details on the performance measures that will be used to measure performance the indicators.

Plan reference	Comments in the submissions	Response
Gundjehmi Aboriginal Corporation		
Section 4.2 Making decisions and working together (on country)	These comments are supported by the findings of the 2012 Technical Audit of the 5th Management Plan. The Audit Summary included the observation that the decisions at the district level seem to come mostly from park staff, leaving little or no chance for input from Bininj/Mungguy. At Board level, decisions are weakened by the inadequate time allowed for socialisation and discussion of issues amongst the different Bininj/Mungguy groups.	No change to the plan. Section 4 of the plan clearly addresses these concerns. Parks Australia is working with the land council, indigenous organisations and representative groups and the Board of Management to determine how to improve engagement and benefits to the Indigenous community.
Section 4.3 Bininj/Mungguy training and other opportunities	The necessity of supporting Bininj/Mungguy organisation and government agencies to delivery local social programmes directly related to Aboriginal engagement and employment in tourism needs to be properly acknowledged and supported.	No change to the plan. Sections 4.3.2 and 6.2.3 acknowledge support to Bininj/Mungguy enterprise opportunities.
Section 4.3 Bininj/Mungguy training and other opportunities	Attachment 2: Add to Section 9.9 5. Facilitate negotiations with private industry to purchase products generated from Bininj projects	No change to the plan. Action 4.3.4 (e) specifies working with stakeholders to help facilitate Bininj/Mungguy enterprise development
Section 5.1 Looking after culture	Provision should be made as soon as practicable within the life of the Plan for Bininj/Mungguy to directly manage sites of cultural significance on their traditional lands and waters. This would ideally be undertaken on the basis of supported commercial contracts between Parks and local Bininj/Mungguy organisations, or via casual employment where Bininj/Mungguy are not employed by the Park. This seemingly insignificant step would speak loudly to Bininj/Mungguy in terms of Parks returning to Aboriginal custodians their traditional rights and responsibilities.	No change to the plan. Covered by Actions 5.1.7, 4.3.7 and Action 4.2.6 which endeavour to engage as many Bininj/Mungguy as possible to implement this plan and include the provision of support and resources to facilitate Bininj/Mungguy involvement and leadership in management programmes. Ways to do this include permanent, contract and flexible employment opportunities.
Section 5.2 Looking after country	4.1 Existing text (Section 5, Floodplains, Actions, page 69, item 5.2.5(a) replicate the traditional floodplain burning regime 4.2 Suggested replacement text 5.2.5(a) Engage Bininj/Mungguy, clans or ranger groups to reinstate traditional floodplain fire management in accordance with Performance Indicators in section 4.3. 4.3 Reason for change To recognise proposed commitments to Bininj/Mungguy knowledge and management.	No change to the plan. Covered by Section 4.2.6 (especially para (d)) and Section 5.3.18.

Plan reference	Comments in the submissions	Response
Gundjeihmi Aboriginal Corporation		
Section 5.2 Looking after country	<p>Attachment 1:</p> <p>1.1 Existing text (Section 5, The lowlands, page 70, Performance indicators)</p> <ul style="list-style-type: none"> • Abundance of significant species. <p>1.2 Suggested replacement text</p> <ul style="list-style-type: none"> • Re-engagement of Bininj/Mungguy in the development and application of lowland fire management, in accordance with Performance Indictors in section 4.3 <p>1.3 Reason for change</p> <p>To recognise proposed commitments to Bininj/Mungguy knowledge and management.</p>	<p>No change to the plan.</p> <p>Covered by Sections 4.2 and 4.3 regarding commitments to working together and Bininj involvement and engagement in fire management programmes and park management.</p>
Section 5.3 Managing park-wide threats affecting values	<p>Recent work on methods to be adopted for the Emissions Reduction Fund has clarified eligibility of carbon farming (savanna burning) projects on parks like Kakadu. The simple, conservation-positive changes needed to avoid ambiguity about regulatory additionality are outlined on Attachment 1.</p>	<p>No change to the plan.</p> <p>There is sufficient scope within the plan for the Board and DNP to support development of a savanna burning project that could be eligible to be registered. The primary party responsible for developing this project is not the DNP or the Board.</p>
Section 5.3 Managing park-wide threats affecting values	<p>Under the GAC proposal, a Bininj/Mungguy savanna burning project would be designed to deliver, at the whole of Kakadu scale, lower frequency and lower severity fire regimes, within which finer-scale burning for particular conservation objectives are necessarily secured. A report setting out the approach and the way a tight partnership with parks would work to reliably deliver better natural and cultural heritage conservation outcomes is available on request.</p>	<p>No change to the plan.</p> <p>There is sufficient scope within the plan for the Board and DNP to support development of a savanna burning project that could be eligible to be registered. The primary party responsible for developing this project is not for DNP or the Board. Fire management is covered under Policies and Actions 5.3.17 to 5.3.27.</p>
Section 5.3 Managing park-wide threats affecting values	<p>Buffalo “Farm”</p> <p>Clause 5.3.13 of the Draft Plan provides that the operations of the so called Buffalo Farm will cease when current management arrangements come to an end but provide no rationale for why the current management arrangements are permitted to continue. This section should be reworded to read:</p> <p>Cease operation of the Buffalo Farm and arrange for removal of all infrastructure and develop a rehabilitation programme with the Traditional Land Owning group.</p>	<p>No change to the plan.</p> <p>Covered by Background text in Section 5.3 and Actions 5.3.13 (Cessation and rehabilitation) and 5.3.39 (rehabilitation works).</p>

Plan reference	Comments in the submissions	Response
Gundjeihmi Aboriginal Corporation		
Section 5.3 Managing park-wide threats affecting values	The Draft Plan does not adequately facilitate the aspirations of Bininj/Mungguy to develop a carbon farming project within the Park. The aspiration is well known. The viability of the project is dependent on the availability of carbon credits generated by fire management undertaken by Bininj/Mungguy separately from those provided for in the Plan or any other associated policy or program. The activities provided for in the Draft Plan, whether they are undertaken or not, should not negatively impact the availability of carbon credits for Bininj/Mungguy carbon farming initiatives.	No change to the plan. This matter is covered by Policies and Actions 5.3.17 to 5.3.27 to actively manage fire to maintain park values.
Section 5.3 Managing park-wide threats affecting values	In contrast to some other areas of operations (e.g. feral animal and weed management) there are no actions proposed to transfer fire management operations to Bininj/Mungguy.	No change to the plan. Covered by Actions 4.2.6 and 4.3.7 to engage as many Bininj/Mungguy as possible to implement this plan.
Section 5.3 Managing park-wide threats affecting values	The GAC proposes that the Director commits to support creation of a Bininj/Mungguy -managed savanna burning project, designed to support all fire-related conservation goals, within 2 years of PoM approval. The way this could be taken up in the Plan of Management without requiring major changes to the existing draft is shown in Attachment 2	No change to the plan. There is sufficient scope within the plan for the Board and DNP to support development of a savanna burning project that could be eligible to be registered. The primary party responsible for developing this project is not the DNP or the Board.
Section 5.3 Managing park-wide threats affecting values	Attachment 2: Add to Section 9.9 2. Following successful implementation of a savanna burning project, progressively transfer all fire management work to Bininj organisations during the life of this plan	No change to the plan. There is sufficient scope within the plan for the Board and DNP to support development of a savanna burning project that could be eligible to be registered. The primary party responsible for developing this project is not for DNP or the Board. Actions 4.2.6 and 4.3.7 aim to engage as many Bininj/Mungguy as possible to implement this plan including fire management programs.

Plan reference	Comments in the submissions	Response
Gundjeihmi Aboriginal Corporation		
<p>Section 5.3 Managing park-wide threats affecting values</p>	<p>2. 1 Existing text (Section 5, Fire, page 89, para 1) An overall fire management strategy for the park will be developed to guide management. It will include landscape-based fire strategies for the stone country, lowlands and floodplains/wetlands and set explicit targets for fire management in these landscapes.</p> <p>2.2 Suggested replacement text An overall fire management strategy for the park will be developed to guide management. It will include several components:</p> <ul style="list-style-type: none"> • a whole-of-Kakadu planning and strategic burning element mimicking approaches successfully applied in neighbouring western Arnhem Land, managed by Bininj and supported by parks staff and WALFA experts • delivery of collectively planned strategic burning by local Bininj with obligations to their clan estates, supported by neighbouring clans and parks staff, where local capacity is under development • coordination of local strategic burning with burning for specific conservation objectives to protect natural and cultural heritage or to protect life and infrastructure in accordance with this plan of management. <p>It is anticipated that a major part of the substantial additional funding required for improved performance will be sourced from carbon farming incomes.</p> <p>2.3 Reason for change It is impossible to set realistic and achievable whole of park quantitative targets matched to the full array of conservation targets dependent on fire use, especially in advance of regaining control. In any event, park-wide quantitative targets are meaningless when natural and cultural heritage conservation goals require fine-scale burning well-tuned to local circumstances and conditions. Moreover, conservation actions will often require increases in burning: for example, to protect grasslands from woody plant encroachment, to manage wetlands for fauna, to facilitate effective</p>	<p>No change to the plan.</p> <p>The plan has intentionally been non-specific with regard to burning programmes within the park so as not to make it a legal requirement to burn in a particular manner.</p> <p>In doing so, any benefits from reductions in carbon output through improved fire management techniques (such as savanna burning - by Parks Australia or a contractor) may be recognised.</p> <p>The detail suggested in the comment is appropriate for inclusion within a fire strategy, but is not required within the management plan.</p>

Plan reference	Comments in the submissions	Response
Gundjeihmi Aboriginal Corporation		
<p>Section 5.3 Managing park-wide threats affecting values</p>	<p>5. 1 Existing text (Section 5, Fire, Policies, page 90, item 5.3.18) 5.3.18 Bininj/Mungguy traditional burning practices will continue to be recognised and incorporated in fire management programmes.</p> <p>5.2 Suggested replacement text 5.3.18 Bininj/Mungguy will apply their traditional burning practices in accordance with customary law and practice and park-endorsed fire management programmes.</p> <p>5.3 Reason for change Consistency with other essential changes to accurately reflect Bininj/Mungguy views.</p>	<p>No change to the management plan.</p> <p>Kakadu National Park is committed to reinstating traditional burning practices in the park. The fire management strategy for the park is under revision and is underpinned by fire scale traditional burning practices, including the bushwalking and burning program and aerial burning program.</p> <p>Kakadu National Park recognises there has been challenges in fire management in recent years due to changes in the budget and resourcing for the park. Recruitment for a threatening processes senior project officer and fire management officer will enable the park to work with Bininj/Mungguy on the implementation of the fire management strategy and reinstating fire scale fire management in the park.</p>
<p>Section 5.3 Managing park-wide threats affecting values</p>	<p>3. 1 Existing text (Section 5, Fire, Management Issues, page 90, para 1) Bininj/Mungguy support It is important to Bininj/Mungguy that they are involved in the development of fire management programmes to ensure that their views regarding how country should be burnt are incorporated and that they support the programmes. It is also important for Bininj/Mungguy to be actively involved in implementing and reviewing the outcomes of fire management programmes.</p> <p>3.2 Suggested replacement text It is essential to Bininj/Mungguy that they are involved in the development and delivery of fire management programmes to ensure that country is burned according to customary law. Bininj/Mungguy are unwilling to delegate this responsibility to others but keen to work in partnership with parks staff to ensure that all the park's natural and heritage conservation, public safety and asset protection goals are met in tandem with customary obligations.</p> <p>3.3 Reason for change Bininj/Mungguy throughout the parks have repeatedly made statements of aspiration in regard to fire management in particular.</p>	<p>No change to the management plan.</p> <p>Kakadu National Park is working on reinstating programs such as the stone country bushwalking and burning program. Bininj/Mungguy were strongly involved in the bushwalking and burning program and reinstating fine scale fire management in the Arnhem Land Plateau. It is planned to recommence this program in the dry season of 2016.</p> <p>The park is also in the process of updating the fire management strategy. Consultations with Bininj/Mungguy for input into the strategy will be undertaken as will Bininj/Mungguy involvement in the implementation of the strategy.</p> <p>During the life of the plan outsourcing of fire management in the park to Bininj/Mungguy organisations is possible under current plan provisions.</p>

Plan reference	Comments in the submissions	Response
Gundjehmi Aboriginal Corporation		
<p>Section 5.3 Managing park-wide threats affecting values</p>	<p>8.1 Existing text (Section 5, Climate change, Background, page 93, para 1) The impact of climate change can be lessened by ensuring that all existing threats to the park’s integrity are appropriately managed. Management of fire, weeds and pest species may need to be reviewed regularly under changing climatic conditions to assess and address resilience of species or habitats. Climate change may offer some economic benefits to Indigenous communities through participation in carbon trading programmes and employment opportunities in monitoring the impacts of climate change and undertaking remedial and mitigation activities. The park is committed to reducing its carbon footprint and is implementing a range of measures to do this (see Section 9.6: Resource use in park operations).</p> <p>8.2 Suggested replacement text The impact of climate change can be lessened by ensuring that all existing threats to the park’s integrity are appropriately managed. Management of fire, weeds and pest species may need to be reviewed regularly under changing climatic conditions to assess and address resilience of species or habitats. Government programmes to mitigate greenhouse gas emissions offer opportunities for the park's land managers to access additional funding for fire management. The park is committed to minimising its carbon footprint, is implementing a range of measures to do this, and will work with Bibinj/Mungguy to integrate carbon farming projects with natural and cultural heritage conservation activities (see Section 9.6: Resource use in park operations).</p> <p>8.3 Reason for change The current text ignores benefits to the park of using carbon farming mechanisms, and requires strengthening to reflect the proposed commitment.</p>	<p>No change to the plan. There is sufficient scope within the plan for the Board and DNP to support development of a savanna burning project that could be eligible to be registered. The primary party responsible for developing this project is not the DNP or the Board.</p>

Plan reference	Comments in the submissions	Response
Gundjeihmi Aboriginal Corporation		
Section 5.3 Managing park-wide threats affecting values	<p>Attachment 2: Add to Section 9.9 Carrying out and authorising activities not otherwise specified and new ways of authorising activities</p> <p>Subject to Board support and guidance, the Director will:</p> <ol style="list-style-type: none"> 1. Work with Bininj to create, within 2 years of the approval of this plan, a savanna burning project that provides a secure and externally funded envelope for finer scale fire management work facilitating achievement of specific conservation objectives <p>Rationale for including [suggestions 1-6] in this Section [section 9.9] of the Plan of Management</p> <p>The rationale for presenting these proposals as Director commitments rather than building them individually into the plan proper is: -</p> <ul style="list-style-type: none"> • to avoid the need for substantial redrafting of many inter-related components of the Plan of Management, especially given the constrained timeframe and GAC's limited resources; • to avoid capture in a process of identification, exploration and examination of options; • to avoid blockages created by the need for complementary actions in other instruments not under the control of the Director (e.g. crocodile management plans) that inhibit detailed specification in the Plan; and • to avoid inhibiting enterprise development. 	<p>No change to the plan.</p> <p>There is sufficient scope within the plan for the Board and DNP to support development of a savanna burning project that could be eligible to be registered. The primary party responsible for developing this project is not the DNP or the Board.</p>
Section 5.3 Managing park-wide threats affecting values	<p>Attachment 2: Add to Section 9.9</p> <ol style="list-style-type: none"> 3. Actively support restoration of damaged environments within the Park to improve ecological function and aesthetics while creating enterprise opportunities for Bininj 	<p>No change to the plan.</p> <p>Covered by Action 5.3.39 about identification and rehabilitation of priority areas. Sections 4.3 and 6.2 cover enterprise opportunities for Bininj.</p>
Section 5.3 Managing park-wide threats affecting values	<p>Attachment 2: Add to Section 9.9</p> <ol style="list-style-type: none"> 4. Support development of landscape rehabilitation expertise and capacity specifically to support the adjacent mine and town rehabilitation program commencing in 2021, through a program of lesser restoration projects 	<p>No change to the plan.</p> <p>Covered by Section 4.3 Bininj/Mungguy training and other opportunities. Rehabilitation in the Ranger Project Area and Jabiru township is not the responsibility of the DNP or the Board.</p>

Plan reference	Comments in the submissions	Response
Gundjehmi Aboriginal Corporation		
Section 6.1 Destination and visitor experience development	While it is true to say the decline in visitor numbers over the years is due to external factors – it is as important to recognise that internal factors are also responsible, including dated and limited infrastructure, access to sites, etc.;	No change to the plan. The current practice of managing access within the park is a result of the recognition of the significance of the World Heritage values of the park and reflect best practice. Opportunities for increased access are considered through Actions 6.1.6 and 6.1.7 on the tourism master plan and precinct planning processes. Also Covered by Action 6.1.9 Where appropriate, consideration will be given to support investment and upgrade opportunities for existing and new experiences within the facilities.
Section 6.1 Destination and visitor experience development	References in the Draft Plan to increasing visitation in a sustainable way are welcome and there is some mention of increasing lengths of visitation (thus increasing yield). There needs, however, to be more weight given to these aspirations and to linking them to ending the increasing number of single-day visits;	No change to the plan. Covered by Action 6.1.8 to investigate, develop and implement strategies (consistent with the Shared Vision Principles and Tourism Master Plan) to increase annual visitor numbers to the park, the spread of visitor numbers across the seasons and the average length of stay in the park.
Section 6.1 Destination and visitor experience development	Tourism planning must occur more frequently than every 10 years. A revised tourism strategy should take place, at least, every two years;	No change to the plan. Covered by Action 6.1.6 which commits to reviewing the tourism master plan every five years. Progress on implementation is reported to the Board of Management and Kakadu Tourism Consultative Committee annually. A review of the master plan every two years would dilute focus on implementation.
Section 6.4 Visitor information	Parks authorities should invest in upgrading facilities and in promoting the Bowali and Warradjan centres;	No change to the management plan. Covered by Action 6.4.6 Investigate and implement ways to attract more people to visit the Bowali Visitor Centre and Warradjan Cultural Centre during their stay, including incentives for commercial tours to include the centres in their itinerary.
Section 8.1 Outstations and living on country	The Draft Plan rightly acknowledges the aspirations of many Bininj/Munggyu to live on country on outstations. Many such settlements existed prior the Park's declaration or were developed after that time, mostly in the 1990s and early 2000s. The Draft Plan also acknowledges that more Bininj/Munggyu outstations are likely to be developed within the life of the Plan. While there are policies for outstation occupancy and a guide provided to the development of proposed outstations, there remains a need for a considered community-wide engagement on living in the Park. There is a growing sense of frustration on the part of Bininj/Munggyu that outstation policy is developed by the Park bureaucracy in isolation of them.	No change to the plan. Commentary only. The management plan and the outstation guidelines (2014) were developed in consultation with Bininj/Munggyu and reflect the views of Bininj/Munggyu through the Board of Management.

Plan reference	Comments in the submissions	Response
Gundjehmi Aboriginal Corporation		
Section 8.1 Outstations and living on country	The GAC suggests that within the first two years of the life of the Plan the Australian Government convene a special working group to develop policies and procedures for Bininj/Mungguy aspirations to be realised. Terms of reference for this working group should be jointly developed in partnership with local Aboriginal organisations and would include detailed planning regarding leasing arrangements on outstations.	No change to the plan. This is not a matter for the plan. It is a matter for the Government and beyond the scope of the plan. Bininj/Mungguy aspirations with regards to protecting the natural and cultural values of Kakadu are reflected in the management plan and Section 4 Joint Management provides for the integral involvement of Bininj/Mungguy in implementing the policies and actions there in.
Section 9.02 Compliance and enforcement	<p>Enforcement of the regulatory provisions of the EPBC Act is of significant concern to the Mirarr. In particular, there have been two incidents of serious contravention for which no enforcement action has been taken. These incidents suggest a growing weakness in the area of enforcement.</p> <p>In the first instance, a burial was allowed to proceed without authorisation and contrary to the wishes of primary Bininj/Mungguy. It appears the Director failed to act because the burial involved an Aboriginal person, although it was known to the Director that the person was not a traditional owner. The consequences of the Director's incompetence to respond appropriately are serious and on-going given that the remains are now located within the Park. This is a matter impacting directly on the traditional owners.</p> <p>In the second instance, the Director investigated and found intentional destruction of Aboriginal cultural heritage. No prosecution followed the findings. The failure to prosecute in this case has undermined the confidence of the primary Bininj/Mungguy in the authority of the Board of Management. In particular, this ongoing matter undermines the confidence of senior Bininj/Mungguy that they have any say over how the Park is administered.</p>	<p>No change to the plan. Commentary only.</p> <p>Both incidents were investigated with a view to prosecution. In relation to the burial issue there was a lack of evidence that the persons did not have traditional rights to do it, and that the burial was opposed by all traditional owners. In relation to the other matter it was independently investigated (by Dept of the Environment investigators) and a decision made it was not in the public interest to prosecute, and a warning sent.</p>
Section 10.5 Commercial use of resources	<p>Attachment 2: Add to Section 9.9 7. Facilitate sustainable saltwater crocodile egg harvests by Bininj: within 5 years of the approval of this plan.</p>	<p>No change to the plan necessary.</p> <p>This matter is covered by Section 10.5 which enables the commercial use of resources.</p>

Plan reference	Comments in the submissions	Response
Gundjehmi Aboriginal Corporation		
Appendices	There is an anomaly in the current listing of KNP. In addition to the other criteria, KNP should be listed under criterion (iii) as it bears exceptional testimony to the cultural tradition of Bininj/Mungguy. This issue requires additional action by the Minister.	No change to the plan. The plan is not the appropriate mechanism. The Kakadu Board has previously written to the Australian government requesting that Kakadu be listed as a cultural landscape but at the time the World Heritage Committee had changed its practices and would only look at each region in Australia every 6 years. The Australian Government needs to approach the WH committee for listing of sites.
Appendices	The Mirarr also request the Australian Government to seek a listing of Kakadu National Park as a World Heritage cultural landscape. The Park falls within the category of an associative cultural landscape. The inclusion on the World Heritage List is justifiable by virtue of the powerful religious, artistic and cultural associations of the natural elements of the Park.	No change to the plan. The plan is not the appropriate mechanism. The Kakadu Board has previously written to the Australian government requesting that Kakadu be listed as a cultural landscape but at the time the World Heritage Committee had changed its practices and would only look at each region in Australia every 6 years. The Australian Government needs to approach the WH committee for listing of sites.
General comment	<p>Comments in this submission are also provided to the Minister to better inform the Minister of the extent to which this proposed draft accords with the relevant management principles applicable under Schedule 8 of the EPBC Regulations 2000. In particular, the Draft must accord with the following IUCN management principles:</p> <p>3.07 The needs of indigenous people should be taken into account, including subsistence resource use, to the extent that they do not conflict with these principles.</p> <p>3.08 The aspirations of traditional owners of land within the reserve or zone, their continuing land management practices, the protection and maintenance of cultural heritage and the benefit the traditional owners derive from enterprises, established in the reserve or zone, consistent with these principles should be recognised and taken into account.</p> <p>The Mirarr intend to request the Minister to take into account these comments in considering whether to approve the Draft Plan of Management and to adopt some additional actions.</p>	<p>No change to the plan. The Board and the Director of National Parks acknowledges the Australian IUCN management principles that are also described within the plan (Appendix H).</p> <p>These matters are covered in Section 4 of the plan including the review of joint management arrangements (Action 4.1.5) which has already commenced and will provide a platform towards improving management arrangements and meeting traditional owner expectations.</p> <p>The plan also includes commitments under Action 4.2.6 to providing opportunities to increase outsourcing of park maintenance activities and aspects of park management such as threat abatement and fire management activities to Aboriginal corporations or enterprises where appropriate and where capacity exists.</p>

Plan reference	Comments in the submissions	Response
Gundjehmi Aboriginal Corporation		
General comment	Lastly, it is important to note that the limited timeframe for public engagement with this Draft Plan, released for comment over the Christmas/New Year break, has been frustrating and disappointing. The process, whether intentionally or not, has made community input extremely difficult. The release of this complex and large document before Christmas provided local representative Aboriginal organisations with their first opportunity to view the Draft Plan, notwithstanding repeated requests to view earlier drafts of the plan on a strictly confidential basis. That Aboriginal organisations (with primary interest in these matters) were only provided with this Draft Plan over a short and difficult time of year and not formally supported in their assessments of the Plan is indicative of larger endemic problems with the current joint management model employed at Kakadu.	<p>No change to the management plan.</p> <p>The Board considered the timing of the public consultation and length of comment period and agreed to proceed despite the time of the year. The Board also agreed to an extension of the public comment period by two weeks resulting in a comment period of more than 10 weeks instead of the statutory 30 days.</p> <p>Two notifications were placed in the NT News and The Australian newspapers and key stakeholders were notified of the public comment period by letter or email and notices were circulated through user group networks.</p>
Jabiru Town Development Authority		
Section 6.4 Visitor information	Parks Australia might consider providing visitors who will be accommodated in the Jabiru township during their holiday with a copy of the “Jabiru Residents’ Handbook – Welcome to Jabiru” which has been updated this year.	No change to the plan. This suggestion is better suited for accommodation businesses in Jabiru to consider including the handbook in their information dossiers.
Section 8.2 Jabiru	I felt the role of the JTDA should be expanded upon, especially its responsibilities under the terms of the Headlease. There is no mention of the relationship between the JTDA and Parks Australia iro sub-leases.	No change to plan. The role of the Jabiru Development Town Authority is covered in the background text for Section 8.2.
Section 9.03 Authorising and managing activities	There is no mention of the JTDA as the entity which grants sub-leases in Jabiru (9.3). Should there be a statement about consultation with the JTDA in the assessment, monitoring of sub-lease compliance and process improvement?	No change to the plan. The matter is covered by Section 8.2.
Section 10.11 Infrastructure and works	Should there be a mention of the JTDA’s and WARC’s key roles in maintaining the infrastructure of Jabiru?	<p>No change to the plan necessary.</p> <p>The matter is covered by Section 8.2 and is cross-referenced in Policy 10.11.4(b)</p>
Appendices	The term “sub-lease” should also be included in the Glossary.	No change to the plan. Sublease is a legal term for the lease of all or a portion of premises by a tenant who has leased the premises from the owner. As this is a legal term that is used within contracts, there are risks in being too specific or narrow in defining this term within the management plan.

Plan reference	Comments in the submissions	Response
Nightcliff (Darwin) Resident		
Section 5.1 Looking after culture	Visiting art sites is a highlight for many but removal of vegetation should be done with consideration. As sometimes trees that are some distance from the site provide protection from weather and should not be cut down. Also all endeavours should be made to prevent damage from feral animals, especially buffalo, given there seems to be an increase in their numbers.	No change to the plan. Agree with the comment that sometimes vegetation can help to protect rock art. Park rangers are trained in rock art conservation measures including removal of some vegetation or leaving vegetation in-situ to protect art from wind and dust. Action 5.1.1 identifies feral animal control as a priority for rock art conservation.
Section 5.3 Managing park-wide threats affecting values	A possibility [to reduce feral animal numbers] is to permit shooting associations to assist.	No change to the plan. Allowing recreational shooters to assist with feral animal control in the park was considered by the Board which resolved: 1) not to alter the plan in response to the comments due to safety, environmental and cultural concerns 2) if the position of the Board changes during the life of the plan, the plan is sufficiently enabling to issue permits to shooting associations, Indigenous enterprises, contractors and individuals to assist in culling operations.
Section 5.3 Managing park-wide threats affecting values	Weed control on some species has been going on for a number of years and although eradication may not have occurred at least the spread has been contained and in most cases this is all that can be hoped for.	No change to the plan. Supportive comment.
Section 5.3 Managing park-wide threats affecting values	Although cane toads have had a significant impact on some species, the actual number of cane toads up on the plateau do not seem to be anywhere near as numerous as they were when they first arrived. Has monitoring shown the recovery of some species due to their ability to adapt?	No change to the plan. Commentary only. There are no conclusive results on the recovery of species following the arrival of cane toads or their ability to adapt. Monitoring of quolls is showing some recovery and adaption to the presence of cane toads however further research is needed to confirm this. Results of research will be communicated publicly when available.
Section 5.3 Managing park-wide threats affecting values	Clearing of campsite areas after the wet season – in some cases the areas have been mown/wippersnipped, but the practice of burning should be phased out.	No change to the plan. Commentary only. Back burning is used to protect some park infrastructure and assets but is rarely if ever used to clear camping areas after the wet season. Camping areas may occasionally impacted by unplanned fires.
Section 5.3 Managing park-wide threats affecting values	Some weedy grass species have the ability to readily establish themselves and spread rapidly. Although often it is humans that bring them in the first place they can then be further spread by animals. Adequate funding needs to be allocated to the removal of such species as soon as their presence is noted.	No change to the plan. The management plan does not set the funding available to undertake management actions. The Park makes its best efforts within the available resources to control threats in the park, taking into account the best information and advice available and priorities for management.

Plan reference	Comments in the submissions	Response
Nightcliff (Darwin) Resident		
Section 5.3 Managing park-wide threats affecting values	Although it is expensive, a concerted effort needs to be made to remove feral cats, pigs and buffalo and once numbers are reduced funding must not be reduced to such a level that numbers start to rise again as in the case of buffalo.	No change to the plan. Covered by Policies and Actions 5.3.9 to 5.3.16 to minimise the impacts of feral animals on park values. Funding for feral animal control is determined by Government budget allocations and revenue raised by the Park.
Section 5.3 Managing park-wide threats affecting values	This is a complex problem (fire) and regardless of where it is in the park, the burning programme appears to be based on a calendar rather than weather conditions (eg a date set, rather than time of finish for the last heavy rains).	No change to the plan. Covered by Policies and Actions 5.3.17 to 5.3.27 to actively manage fire to maintain park values. Fire management in the park is based around wet season planning and burning and dry season planning and burning and not on the calendar year as suggested.
Section 5.3 Managing park-wide threats affecting values	Fires on the stone country are particularly damaging to many species and the regular nature of the control burns may well be selectively encouraging the growth of some species and at the same time could be the demise of others. Burning should occur at irregular intervals.	No change to the plan. Covered by Policies and Actions 5.3.17 to 5.3.27 to actively manage fire to maintain park values. Fire management in the stone country is covered by the stone country fire management plan, which was developed by fire experts and is being implemented with positive results. An updated fire management strategy is currently being drafted to guide stone country fire management in the future.
Section 5.3 Managing park-wide threats affecting values	Control burns are done along roads as a means of preventing hotter burns later in the season but this does not make for an attractive introduction for visitors to the Park. Perhaps the question should be asked who is lighting fires along the roads that make it necessary for the control burns – is it visitors or is it locals?	No change to the plan. Covered by Action 5.3.26 through the development and implementation of an education and communication programme for residents, contractors, tour operators and park visitors on fire and Action 5.3.27 on engaging resident Bininj/Mungguy to attract their active support for preventing and reporting unplanned ignition, the impacts and responsibilities.
Section 10.4 Access	Under this section there is no mention of access by walking i.e. bushwalking. I am assuming this is going to be covered in the “Bushwalking Management Plan.”	No change to the plan necessary. The matter is covered by actions in Section 6.1, specifically the walking strategy (6.1.10).
Section 10.8 Commercial tourism and accommodation	Policies 10.8.10 Commercial accommodation facilities may be established and operated in the park on areas occupied under a lease, sublease or occupation licence granted by the Director with the approval of the Board and consistent with Section 9.5 (Assessment of proposals).” I hope the above policy does not open the door to huge commercial accommodation facilities – these type of establishments should be kept outside the Park.	No change to the plan. The environmental impact assessment (EIA) process outlined in section 9.5 of the plan are rigorous, and the Guidelines for EIA (2008) in place under the plan help to ensure protection of natural and cultural values.

Plan reference	Comments in the submissions	Response
Nightcliff (Darwin) Resident		
General comment	This is a huge document, with an enormous amount of information and consequently I believe few will take the effort to wade their way through it. Perhaps some of the background information could be summarised and the full version put on a link as additional reading?	<p>No change to the management plan.</p> <p>A summary of the draft plan was prepared and released at the time that the plan was released for public comment. Most stakeholders will be interested in a particular aspect of the plan and only refer to the relevant sections of the plan via the contents page or through searching for key words in the PDF version of the plan.</p> <p>The plan itself is a legislative instrument and enables activities otherwise restricted by EPBC Legislation. It covers the management of the park for a 10 years period and could not be condensed further.</p>
General comment	Many of the action points are more like policy statements, with words like “review, up-date, monitoring” etc. but little in the way of specific actions. E.g. 5.3.12 Feral Animals: Actions“(c) using a range of mechanisms to deliver feral animal management and control” What are the mechanisms?	<p>No change to the management plan.</p> <p>Management actions in the plan have been worded to start with a verb and are generally quite specific e.g. Implement, review and update the park feral animal management strategy. However they are not meant to prescribe which mechanisms will be used to undertake the activity unless necessary. The way in which an activity such as feral animal control will be undertaken is prescribed by the relevant strategy. This allows for adaptive management programmes in the park.</p>
Northern Land Council		
Section 2.2 Management plan framework	Future planning should utilise the open standards methodology which is one of the major best practice planning methodologies for natural and cultural resource management used around the world today. This methodology seeks to address often ambiguous and complex planning language and structures, ensuring that vision is connected structurally to actions on the ground through clear monitoring and evaluation design. This link is inadequate in the draft sixth plan and as such the gap between policy and implementation will continue to be an impediment to driving outcomes on key challenging areas of joint management in Kakadu.	<p>No change to the plan.</p> <p>In response to the recommendations of the Technical Audit of the fifth plan, significant structural changes were made to the plan to ensure a clear line of sight from the park values that we want to protect through to policies and management actions (in response to the threats to the values) and performance indicators. The open standards methodology has been considered and useful components incorporated into the Parks Australia management effectiveness framework.</p> <p>Under the plan, a performance monitoring plan will be prepared which describes performance monitoring for the park at a more detailed, prescriptive manner.</p>

Plan reference	Comments in the submissions	Response
Northern Land Council		
Section 2.2 Management plan framework	That the sixth Draft Plan still has not addressed measurement and prioritisation of objectives/actions is disappointing. Measurement goes a long way to driving implementation, which is a key issue not addressed so far.	<p>No change to the plan.</p> <p>Section 2.2 includes the prioritisation methodology used in the plan. This includes identification of the significance of threats affecting park values. Priority sites and species are also being identified outside the management plan to inform management actions.</p> <p>Section 7.1.11 includes an action to map priority areas for natural and cultural values in each of the four major landscapes to inform management priorities for managing weeds, fire and other threats.</p> <p>9.10.9 includes an action to prepare a Performance Monitoring Plan that specifies the measures that will be used to monitor each performance indicator in the plan.</p>
Section 4.1 Making decisions and working together (Board of Management)	The last paragraph should include specific reference to the ALRA and IUCN principles. (Section 4.1, page 30)	No change to the plan. This matter is covered in Section 4.1.
Section 4.1 Making decisions and working together (Board of Management)	<p>However, the Draft Plan does not sufficiently recognise the importance of the role of the NLC, in particular, its role in facilitating consultation with traditional owners, representing their views and providing expert anthropological advice in respect of traditional ownership. This role arises under:</p> <p>a. clause 9(r) of the Park Leases, which provides that the Lessee covenants “to liaise and consult regularly with the Land Council and Relevant Aboriginal Associations in connection with the administration, management and control of the Park” ((clause q) in the Kakadu and Jabiluka leases); and</p> <p>b. section 23(c) of the ALRA, which provides that a function of the NLC is to “consult with traditional Aboriginal owners of, and other Aboriginals interested in, Aboriginal land in the area of the Land Council with respect to any proposal relating to the use of that land”.</p> <p>A brief discussion of the role of the NLC is provided on page 31 of the Draft Plan. However, this does not adequately describe the roles of the NLC described above.</p>	<p>No change to the plan.</p> <p>The comment relates to background text that is identical to the previous plan and provides a general overview of the role of the NLC. The substantive role of the NLC is captured via the policies in the plan and the consultation guidelines approved by the Board.</p>

Plan reference	Comments in the submissions	Response
Northern Land Council		
Section 4.1 Making decisions and working together (Board of Management)	The NLC also notes that the independent audit into the fifth plan identified significant areas for improvement during the life of the next plan with regard to 'Making decisions together' citing "inadequate time allowed for socialisation and discussion of issues among different Bininj groups." Dissatisfaction with consultation processes is a common issue raised by traditional Aboriginal owners.	No change to the plan. Policy 4.1.2 outlines how the Board will be supported to carry out its functions.
Section 4.1 Making decisions and working together (Board of Management)	While the NLC and Parks Australia are working together to reinstate the Kakadu Joint Management Officer, the loss of this position in recent times has severely limited the involvement of traditional Aboriginal owners beyond the Board of Management in the management of Kakadu National Park. The independent audit of 5th plan also recommended the provision of two Joint Management Officers to address this issue.	No change to the plan. Noted. The process is underway to reinstate a Joint Management Officer position with the NLC.
Section 4.1 Making decisions and working together (Board of Management)	Also, Table 3 (on page 34), refers to "NLC consultation guidelines" without giving any further detail as to the content of these obligations or how they are/will be informed.	No change to the plan. Policy 4.2.2 The consultation guidelines developed by the Board and the NLC that guide when and how Bininj/Mungguy are consulted on routine and non-routine development proposals and actions will be used when consulting with Bininj/Mungguy. The guidelines will be reviewed by the Board (see Section 4.2.8).
Section 4.2 Making decisions and working together (on country)	At section 4.2 of the Draft Plan, it is noted that "in carrying out consultations with Bininj/Mungguy, assistance may be sought from the NLC and relevant Aboriginal associations to arrange consultations with, and provide information for and from Bininj/Mungguy". This statement (and surrounding discussion in the Draft Plan) does not go far enough in acknowledging the statutory duties of the NLC and the obligation of the Lessee under the Park Leases to involve the NLC in consultations.	No change to the plan. Section 4.1 clearly indicates the role of the NLC: The Northern Land Council (NLC), which is established under the Land Rights Act, has broad functions to assist and represent the interests of the traditional Aboriginal owners of land and other Aboriginals. Under the park leases the NLC has a number of specific roles, including to be consulted regularly about the management of the park. Under the EPBC Act the Director is required to consult the NLC about park management generally and in relation to preparation of management plans in particular. The Lease agreements (Appendix I to the management plan) provide greater detail on the requirements for the Director of National Parks to consult with the NLC acting on behalf of the traditional owners of the park.

Plan reference	Comments in the submissions	Response
Northern Land Council		
Section 4.2 Making decisions and working together (on country)	<p>The sixth draft (at page 30) states that “successful joint management is based on a partnership of trust, commitment, and shared responsibility which involves bringing together Bininj/Mungguy and Balanda knowledge and experience and interweaving of the two systems together in making decisions.” Working closely with NLC processes under ALRA is the best manner in which to ensure that the two systems work together. The Draft Plan does not adequately acknowledge to role of the NLC in this respect.</p>	<p>No change to the plan.</p> <p>Section 4.1 clearly indicates the role of the NLC:</p> <p>The Northern Land Council (NLC), which is established under the Land Rights Act, has broad functions to assist and represent the interests of the traditional Aboriginal owners of land and other Aboriginals. Under the park leases the NLC has a number of specific roles, including to be consulted regularly about the management of the park. Under the EPBC Act the Director is required to consult the NLC about park management generally and in relation to preparation of management plans in particular.</p> <p>The Lease agreements (Appendix I to the management plan) provide greater detail on the requirements for the Director of National Parks to consult with the NLC acting on behalf of the traditional owners of the park.</p>
Section 4.2 Making decisions and working together (on country)	<p>The Draft Plan discusses the number of indigenous people employed in the Park during the lifetime of the previous plan. This section highlights that 48% of staff in either ongoing or non-ongoing contracts identified as “Indigenous”.</p> <p>While the NLC supports all forms of indigenous employment, the NLC is particularly concerned with outcomes for local traditional owners. The best indigenous employment outcomes are those where the "right people for country" are seeing the benefit of activities on their land.</p> <p>Accordingly, employment statistics would be more meaningful if they are able to identify traditional Aboriginal owners, distinct from those who ‘identify as indigenous’. Further clarity around percentage of indigenous employees which were ongoing and non-ongoing is also required.</p> <p>(Section 4.2)</p>	<p>No change to the plan.</p> <p>This matter is covered by Section 4.2 which specifies how Bininj/Mungguy will be encouraged and supported to be engaged in park decision-making and identifies that a range of employment opportunities for Bininj/Mungguy are available, including active representation on staff selection processes.</p>

Plan reference	Comments in the submissions	Response
Northern Land Council		
Section 4.2 Making decisions and working together (on country)	The plan asserts that the “park will be managed as if all land in the park is Aboriginal land under the ALRA. Where traditional ownership of an area is unclear, consultation will occur with all relevant Bininj/Mungguy”. While the NLC, agrees with the land being treated as if it were Aboriginal land and while the NLC is aware of a number of traditional ownership disputes within the Park, it should be of assistance to note in the Draft Plan at this point, that the NLC may provide anthropological advice in the case of a dispute. By simply allowing all parties equal consultative rights, without the receipt of expert anthropological advice, it may be that people without true claim are offered more say in matters than is appropriate. (Section 4.2.1)	No change to the plan. This matter is covered in Section 4. "Relevant" Bininj/Mungguy are those with traditional rights, i.e. identified traditional owners of Aboriginal land in the park, others with traditional rights to Aboriginal land, and those with traditional rights in the areas still under claim. They will be identified and consulted in accordance with advice from the NLC, as we have always done.
Section 4.2 Making decisions and working together (on country)	The NLC would like to see the Draft Plan address the difficulties in undertaking adequate consultation, recognising role that the NLC can play in effective consultation. Careful consultation, guided by expert anthropological advice, including careful documentation of all such engagement must be a key focus along with strong measures to ensure broader regional consultation on all relevant issues as discussed in the audit of the fifth plan.	No change to the plan. This matter is covered in Section 4.2 which acknowledges the difficulties around consultations and Section 4.1 which explains role of NLC and the requirements of the Director to consult with the NLC.
Section 4.2 Making decisions and working together (on country)	In practice, and for a number of reasons, assistance is now rarely sought from the NLC for consultations, resulting in some concerning outcomes — for example, the exclusion of traditional Aboriginal owners from decisions that affect their country.	No change to the plan. Policy 4.2.2 states that the consultation guidelines developed by the Board and the NLC guide when and how Bininj/Mungguy are consulted. Action 4.2.8 provides for a review of the consultation guidelines and a central database that records all decisions made in consultation with Bininj/Mungguy.
Section 5.1 Looking after culture	While this section refers to the An-garregen (cultural heritage) Strategy in passing, the link should be made stronger and the strategy should feature clearly in this section. The implementation of the strategy should be listed throughout this section as an outcome. (Section 5.1)	No change to the plan. The An-garregen Strategy is acknowledged in numerous places in Section 5 of the plan (e.g. Background text Section 5.1; the overarching principles for managing cultural values; Figure 8; Action 5.1.5).
Section 5.1 Looking after culture	Given that there could be 10 000 to 15 000 sites with only 5 000 sites recorded, a major ‘outcome’ in this section should be the provision of funding and ongoing recording of further sites.	No change to the plan. Identifying resource commitments for rock art work is outside the scope of the management plan.

Plan reference	Comments in the submissions	Response
Northern Land Council		
Section 5.3 Managing park-wide threats affecting values	The loss of knowledge because of a lack of intergeneration transfer of knowledge is the primary threat to the cultural heritage of the park, however this is not made clear in this section. Figure 12, p. 78 does not indicate threats to intangible aspects of living culture.	Amendment to the plan. Figure 12 has been amended so that the Cultural Heritage Strategy is identified as a relevant strategy under the outcomes for cultural values, feral animals and fire.
Section 8.1 Outstations and living on country	Section 8.1 deals with the process for establishment of new outstations and the occupancy of outstations that pre-date the establishment of the park. While, broadly speaking, the NLC supports the process set out in this section, the section fails to note the reservation at clause 3 of the park lease which reserves to the land trust the right to require a sublease of any reasonable part of the park in accordance with the relevant legislation and the Plan of Management. While this right to a sublease is not limited to outstations, it would certainly apply to the establishment of a new outstation.	No change to the plan. It is correct the park lease says a Land Trust can require the Director to consent to granting a sublease; but goes on to say that consent will not be unreasonably withheld. In the context of outstations, the process for giving consent is with the approval of the Board, in accordance with the outstation guidelines (2014) approved by the Board.
Section 9.10 Implementing and evaluating the plan	Previous monitoring and evaluation efforts should be discussed in the background.	No change to the plan. The technical audit's findings re the need to improve monitoring and reporting to provide evidence-based measures of progress is identified in Section 2.1 (Management planning process). The management plan is already long and the results of monitoring are highlighted in background information in the relevant sections e.g. fire and weed sections.
Section 9.10 Implementing and evaluating the plan	The 5th plan at section 8.9.5 (page 150) directed the park manager to report to the board on implementation of the plan and on park expenditure on a quarterly basis. This requirement should remain in the new plan.	No change to the plan. This matter is covered by Policy 9.10.6 which includes a commitment for the Park Manager to report quarterly to the Board on the implementation of this plan, park expenditure and performance indicators.
Section 9.10 Implementing and evaluating the plan	While a good plan must be flexible and adaptive, remaining relevant as the complex stakeholder environment ebbs and flows, a good plan of management should go well beyond aspirations and commitments to undertake planning in the future. The current plan does not adequately set out structures to ensure effective implementation but rather defers to this process being undertaken at a later date (see for example, page 148, section 9.10.7).	No change to the plan. The plan is an enabling document and is not meant to prescribe how implementation of the actions will occur. An implementation plan for the management plan will be developed under Action 9.10.8. Operational plans will support the implementation plan and progress on the implementation of the plan will be reported periodically to the Board (Action 9.10.6).
Section 9.10 Implementing and evaluating the plan	Much of the implementation plan should be defined already in the management plan. At the very least a framework for the implementation plan should be included as an appendix. That a set structure for this is not established by the sixth plan is unacceptable.	No change to the plan. An implementation plan for the management plan will be developed under Action 9.10.8. Operational plans will support the implementation plan and progress on the implementation of the plan will be reported periodically to the Board (Action 9.10.6).

Plan reference	Comments in the submissions	Response
Northern Land Council		
Section 9.10 Implementing and evaluating the plan	While the plan must allow the ability to be adaptive, adequate measures of most outcomes, performance indicators and actions can and should be defined within the plan rather than after it is delivered.	No change to the plan. Measures of performance indicators are not necessary to include in the management plan and will be identified in the performance monitoring plan in accordance with Action 9.10.9.
Section 9.10 Implementing and evaluating the plan	This section requires a third party review of the sixth plan at the eighth year of the plan. If the term of the plan is not reduced then at a minimum, this third party review should be undertaken at the four year mark and the eight year mark.	No change to the plan. This matter is covered by Section 9.10 which requires the development of an implementation plan and reporting to the Board on progress in implementation. Parks Australia is considering the use of a 4-4-2 strategy for implementation of management plans. Where the first four years will be scheduled, monitored and reviewed, the second 4 years scheduled and adapted in response the results for the first 4 years, and then another formal review performed after 8 years to inform the development of the next management plan and the last 2 years of implementation. This proposal is under consideration for all Commonwealth reserves but will not be locked in through inclusion in the management plan.
Section 9.10 Implementing and evaluating the plan	Part (a) of 9.10.10 should specifically identify the measurement of indicators as well as outcomes and objectives.	No change to the plan. Measures of performance indicators are not necessary to include in the management plan and will be identified in the performance monitoring plan in accordance with Action 9.10.9.
Section 9.10 Implementing and evaluating the plan	Given that indicators, objectives, actions and measures over the fifth and sixth plan and for that matter those before them have remained relatively unchanged, the review process identified in 9.10.10 should be tasked with the development of effective measures as a recommendation for the seventh plan. The open standards process, which is now the predominant methodology for planning in natural resource management around the world should be adopted to guide this process in the future.	No change to the plan. In response to the recommendations of the Technical Audit of the fifth plan considerable work has been invested in developing explicit and measureable performance indicators for the sixth plan. The Management Effectiveness Framework described in Section 9.10 of the plan is in alignment with the open standards methodology.
Section 9.10 Implementing and evaluating the plan	Measurement of implementation is vital and has not been adequately undertaken in the past. As per open standards methodology a good plan must, where possible, identify objectives and actions in such a way as to be specific, measurable, achievable, resourced and temporally bound.	No change to the plan. In response to the recommendations of the Technical Audit of the fifth plan considerable work has been invested in developing explicit and measureable performance indicators for the sixth plan. Policy 9.10.6 includes a commitment for the Park Manager to report quarterly to the Board on the implementation of this plan, park expenditure and performance indicators.

Plan reference	Comments in the submissions	Response
Northern Land Council		
General comment	A brief review of the records of the consultation process undertaken by Parks Australia in preparing the Draft Plan highlights the fact that without the involvement of the NLC consultation can be inadequate. In particular, these consultations do not appear to have included all relevant traditional owners. It appears that consultations have been limited to a few groups, and within these groups, a few individuals.	No change to the plan. This matter is covered in Appendix E which lists all the consultation meetings held with traditional owners for development of the management plan. This shows that the consultations involved a total of 128 Bininj/Mungguy (including Board and Working Group members and staff). Parks Australia values the assistance provided by the NLC and will continue working with them as a partner in the management of the park and consistent with the Director's obligations under the lease.
General comment	The plan also fails to capitalise on a major volume of work between the plans over the years which goes unreported and unmeasured. It would be valuable to note significant actions undertaken and completed from the previous plan.	No change to the plan. Each section of the plan does note the significant actions undertaken during the life of the previous plan. For example Section 5.1 notes the development of An-garregen (cultural heritage) Strategy in 2011 and a major symposium on cultural heritage held in the park in 2011. The document is not meant to be a historical reference document.
General comment	The NLC notes the shift in the length of the Draft Plan to ten years, as opposed to the seven year duration of the previous Plan. While a ten year plan offers certainty and consistency going forward, the NLC is concerned that it removes flexibility and locks-in processes and systems that may require adaptation during the life of the plan. A shorter life for the plan better allows for negotiations with traditional Aboriginal owners and other stakeholders as priorities in a range of important areas change.	No change to the plan. The EPBC Act was amended in 2006 to make management plans for Commonwealth reserves effective for 10 years. The plan is sufficiently flexible to allow for changes in management arrangements and programmes. The implementation of the plan will be reviewed regularly and consultations with traditional owners will continue through the life of the plan.
Northern Territory Government		
Section 1.1 A description of Kakadu National Park	The introductory sections in the Draft Plan of Management for Kakadu National Park (draft management plan) are both detailed and extensive; notwithstanding the document would benefit from an early summary of the journey of the past 30 years, including where the primary gains have been made in terms of content (values) and process (joint management) and where key challenges remain to provide context to the ensuing plan.	No change to the plan. Previous plans have included extensive reference material on the park and there has been a conscious decision in the writing of management plan for Commonwealth reserves to write the plans as planning documents, not historical documents.
Section 4.1 Making decisions and working together (Board of Management)	As outlined in 4.1.6, a review of the terms of reference for the Kakadu Tourism Consultative Committee and the Kakadu Research Advisory Committee mid-way through the life of the plan is strongly supported by the NTG to ensure the Committees and their related expertise remain relevant and accountable to the draft management plan as it is progressed through the various stages of implementation.	No change to the plan. Supportive comment.

Plan reference	Comments in the submissions	Response
Northern Territory Government		
Section 4.1 Making decisions and working together (Board of Management)	The NTG strongly recommends that road maintenance activities which include resealing, resheeting, rehabilitation and drainage maintenance are treated as 'routine activities' and therefore not be elevated for Board approval as this creates unnecessary delays when carrying out routine maintenance activities.	No change to the plan. Maintenance activities such as these are considered 'routine actions' and generally do not require Board approval.
Section 4.2 Making decisions and working together (on country)	The NTG recommends consideration be given to a review of existing modes of engagement and communication with the Bininj/ Munggyu to identify areas for improvement as the lack of participation from Bininj/ Munggyu is a consistent theme throughout the Management Issues and Background sections of the entire draft management plan.	No change to the plan. Section 4 of the plan clearly addresses these concerns. Parks Australia is working with the land council, indigenous organisations and representative groups and the Board of Management to determine how to improve engagement and benefits to the Indigenous community.
Section 4.2 Making decisions and working together (on country)	Specifically, in the Management Issues subsection under 4.2, the draft management plan states that 'employment opportunities, consultation opportunities, and other opportunities to participate in decision making and implementation of the plan are not always taken up or retained by the Bininj/Munggyu'. While there are policies and actions that relate to the other management issues, it isn't clear how the policies / actions identified in this section will improve or overcome this management issue.	No change to the plan. The policies and actions in section 4.2 of the management plan specifies how Bininj/Munggyu will be encouraged and supported to be engaged in park decision-making and identifies that a range of employment opportunities for Bininj/Munggyu are available.
Section 5.1 Looking after culture	The NTG welcomes the commitment at 5.1.13 in the draft management plan about continuing collaborative work with the Aboriginal Areas Protection Authority (AAPA) to increase sacred site registrations and documentation.	No change to the plan. Supportive comment.
Section 5.2 Looking after country	The NTG recognises that KNP has extraordinary biodiversity values that are significant at Territory, national and international scales. These values relate to the presence of many endemic, range-restricted and threatened species; the very high richness of plant and animal species; the broad range of habitats represented; and the extensive wetlands and coastal floodplains supporting large aggregations of wildlife. The NTG understands the significance of KNP as a conservation asset, due to the values described above combined with the large size of the park and the representation of most Top End species and habitats. The NTG also recognises that these biodiversity values underpin many of the indigenous cultural values of the park, and the park's recreational and tourism potential.	No change to the plan. Commentary only.

Plan reference	Comments in the submissions	Response
Northern Territory Government		
Section 5.2 Looking after country	As identified in the response to Part A Section 2, the development of indicators that are meaningful in terms of real outcomes, and the ability to robustly monitor such indicators, are crucial to the success of a genuine management effectiveness framework.	<p>No change to the plan.</p> <p>The performance indicators in the plan provide a broad range of aspects of management that can be monitored to determine if the park is being effectively managed.</p> <p>Under Section 9.10, a performance monitoring plan is prepared which describes performance monitoring for the park at a more detailed, prescriptive manner. The performance monitoring plan describes thresholds to determine performance.</p>
Section 5.3 Managing park-wide threats affecting values	NT Parks and Wildlife advise that the term ‘pest’, rather than ‘feral’, is in line with nationally accepted terminology therefore recommends PA considers changing to this term within section 5 and throughout the document.	No change to the plan. Unnecessary terminology change.
Section 5.3 Managing park-wide threats affecting values	<p>The NTG is concerned that KNP faces a number of serious management challenges in retaining its natural values which are not adequately addressed or weighted in the draft management plan. These challenges include reducing fire frequency and extent; restraining the spread of serious environmental weeds such as gamba and para grass; recovering dramatically declining small mammal populations; controlling feral animals including buffaloes and cats; and building resilience to long term impacts of climate change and sea-level rise.</p> <p>While these challenges are recognised as such in the draft management plan, the detail of how they will be addressed is left to subordinate strategies and operational plans, making it difficult to judge how effective such management strategies are likely to be. The NTG recommends that PA considers including greater detail on the development, implementation, governance and performance assessment of these subordinate strategies, and provides greater assurance that there will be adequate resourcing for their effective implementation.</p> <p>A relevant example relates to crocodile management within the park. The draft management plan is relatively silent on how crocodiles will be managed within the park with the exception of a couple of references made to ‘the crocodile management strategy’ without any formal reference of where this can be obtained, what it covers and how it will be measured.</p>	<p>No change to the plan.</p> <p>The management plan comprehensively recognises the threats to park values and establishes that these threats will be addressed through specific management strategies, which will be developed in consultation with Bininj/Mungguy, relevant stakeholders and advice from scientists on the Kakadu Research and Management Advisory Committee.</p> <p>The management plan specifically commits the Director will as far as practicable consult with relevant stakeholders where their interests are likely to be significantly affected by the development of strategies made by the Board and/or the Director (see policies 4.1.4 and 9.7.3).</p> <p>The management plan also commits to the review of management strategies and plans at least every 5 years (see policy 9.10.4). The use of management strategies thus enables the park to apply an adaptive management approach.</p> <p>The management plan commits to the development of an implementation plan within 12 months of the plan coming into effect (see action 9.10.8). This implementation plan will establish a schedule for the development and review of management strategies. The primary intent of strategies identified in the plan is captured in the plan (for example see Policy 9.1.4).</p>

Plan reference	Comments in the submissions	Response
Northern Territory Government		
Section 5.3 Managing park-wide threats affecting values	The draft management plan does not address planning for the incorporation into the park of the Ranger Uranium Mine site, post its closure and rehabilitation, which is due to be completed in 2026. It is recommended that the draft management plan acknowledge and provide some indication of planning to address the transition.	<p>No change to the plan.</p> <p>The eventual closure of the Ranger mine is discussed in section 8.2 in relation to Jabiru. and further discussed in Section 9.7. Policy 9.7.4 specifically describes working with stakeholders to minimise potential impacts on the park arising from reduction or cessation of mining.</p> <p>The Director is not responsible for the rehabilitation of the mine but will work with the NLC, Relevant Aboriginal Corporations, the Office of the Supervising Scientist and Energy Resources Australia to discuss issues related to the rehabilitation of the Ranger project area by ERA and eventual transition of the lease into the park.</p>
Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion	Given its iconic role in attracting tourists to the Northern Territory, it is essential that the park be managed in a manner that facilitates its use by the tourist industry. The NT Government believes that a significant shift in park management focus is required to deliver the desired growth in tourism visitation and commercial activity. It is highlighted that previous versions of the draft management plan and the subordinate Kakadu National Park Tourism Master Plan have primarily focused on views of the land owners and land managers and in doing so have lost sight of the view of the visitor and commercial operator.	<p>No change to the plan.</p> <p>Covered by Section 6.2 which includes a number of actions about working with commercial tour operators by creating partnerships and providing incentives.</p> <p>The park is primarily aboriginal land. As owners of the land, Bininj have the right to direct changes in the impact and direction of tourism on their land. The terms of the Lease to the Director of National Parks includes a range of obligations to ensure that the culture of Bininj is respected and that we ensure that benefits are made available to Bininj as a result of the operation of the park. We cannot impose requirements upon Bininj to participate or support enterprises and developments on their land.</p>
Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion	Previous versions of the draft management plan and the subordinate Kakadu National Park Tourism Master Plan have primarily focused on views of the land owners and land managers and in doing so have lost sight of the view of the visitor and commercial operator which is evidenced by the lack of activity on the ground. The current language and tone of park communication and the volume and layers of plans, policies and administrative requirements does not, in our view, suggest enthusiasm to facilitate investment, focussing rather on the considerable extent of compliance that is needed. Real or perceived, this impacts on the ability to attract commercial investment in the KNP.	<p>No change to the plan.</p> <p>The management plan is a legislative instrument and it enables certain activities to occur within the park that would otherwise be restricted by the EPBC legislation. It also places restrictions on some activities in the park that were not otherwise regulated (very few things are actually restricted by the plan alone). The plan is not a strategic document for the future of tourism in the park. Such strategies are found in the Tourism Master Plan (Action 6.1.6) and precinct plans (Action 6.1.7) for future development of tourism in the park.</p>

Plan reference	Comments in the submissions	Response
Northern Territory Government		
Section 6.0 Kakadu as a visitor experience destination, commercial tourism and promotion	The NT Government response includes an offer to work collaboratively with the Board and Parks Australia on marketing and to develop new and/or extend existing visitor experiences in order to encourage increased usage of the park. The NT Government response is also strongly supportive of increased investment in tourism facilities within and adjacent to the park. These particular aspects are also issues to which the Jabiru Region Working Group could pay attention and act upon.	No change to the plan. Supportive comment. Comment noted and Parks Australia looks forward to further collaborations with the NT Government.
Section 6.1 Destination and visitor experience development	Relating to 6.1.8, NTG is keen to work with PA to develop visitor experiences that assist in increasing visitation and length of stay, seasonal and regional dispersal. For example, using events such as Kakadu Bird Week to encourage visitation outside of the main tourist season and/ or the development of birding infrastructure to assist in driving visitation from a relatively untapped market for KNP.	No change to the plan. Comment noted.
Section 6.1 Destination and visitor experience development	6.1.17 addresses park access due to weather. Access is a key issue effecting visitation to the park and the entire region. The current season is already very short, therefore the NTG recommends that priority be given to providing the maximum window of opportunity to access park sites.	No change to the plan. Covered by Action 6.1.17 which provides for using best endeavours to ensure that public areas are open for as long as possible, particularly early in each year.
Section 6.1 Destination and visitor experience development	6.1.18 addresses the staged opening of sites over the shoulder season. While this may have a positive impact on visitation, the NTG is keen to ensure the overriding priority is to get sites open as early as possible.	No change to the plan. Covered by Action 6.1.17 which recognises that park management aims for public areas to be opened as early as possible.
Section 6.1 Destination and visitor experience development	To service this market, the NTG recommends consideration is given to the development of a walking app, similar to the Kakadu birds app, which includes interpretation of the natural and cultural environments, walking trails, information on restricted areas, permit conditions, tips for safe walking, etc.	No change to the plan. Covered by Action 6.1.10 that can include the development of an application for walks in the park as part of the walking strategy (Action 6.1.10).

Plan reference	Comments in the submissions	Response
Northern Territory Government		
Section 6.1 Destination and visitor experience development	In relation to 6.1.14, the NTG recommends that PA looks for ways to facilitate ease of access for visitors and to create an enabling environment for businesses to operate within the park. For example, if online booking systems were to be put in place for entry, attraction and camping facilities, this would encourage visitors to use electronic systems to facilitate their booking, provide 24 hour / day access, quick response times and reduce demands on park staff, freeing resources.	No change to the plan. Covered by Section 6.2 where the desirable outcome is that the commercial tourism industry enjoys an encouraging and facilitating business environment. Actions 6.2.7 and 6.2.8 support this through a commitment to providing incentives and creating partnerships with commercial operators to improve the quality and variety of tourism experiences. Action 9.3.4 commits to reviewing and, where possible, improving systems for the processing, administration and management of permits, licences and leases/subleases and on-line systems will be considered in this context.
Section 6.1 Destination and visitor experience development	In relation to 6.1.10, NTG recommends that PA prioritises the development of an iconic walk trail in KNP similar to the Jatbula and Larapinta trails. There is the opportunity to link into Nitmiluk NP as well across Jawoyn country. This would be a highly appealing visitor experience and in line with Tourism NT's market segment development strategy. In addition to an iconic walk, the development and promotion of a greater range of extended/overnight and off-track walking options would add to Kakadu's offering from a tourism perspective, encouraging more visitors to come to the park.	No change to the plan. Covered by Actions 6.1.7 and 6.1.10 where opportunities for more walking routes throughout the park will be considered in the walking strategy and through the precinct planning process.
Section 6.1 Destination and visitor experience development	In relation to sections 6.1.11 – 6.1.13, the NTG recommends that the identified review of fishing and boating in the park and the actions relating to recreational fishing in the park look at revenue generating opportunities in order to extract a greater visitor spend from this market segment.	No change to the plan. Consideration will be given to the terms of the review of recreational fishing in due course.
Section 6.1 Destination and visitor experience development	The NTG recommends this section includes an outline of how PA will identify new experiences to improve the number, diversity and quality of experiences offered in the park (except for fishing-related activities). For example, consideration might be given to the development of a Tourism and Visitor Engagement Strategy (or similar) to help address 6.1.5 and 6.1.8. The NTG would welcome the opportunity to work with PA to develop this.	No change to the plan. Covered by Actions 6.1.6, 6.1.7 and 6.1.8 that provide for tourism and visitor experience planning processes.

Plan reference	Comments in the submissions	Response
Northern Territory Government		
Section 6.1 Destination and visitor experience development	The NTG recognises that crocodile management will become more of an issue over the life of this plan and there is a consequent need to ensure enough natural swimming areas are still available for visitors to use as these areas are key visitor attractions.	No change to the plan. Covered by Action 9.1.4 on a crocodile management strategy to minimise risk to people and Action 9.1.12 that commits to reviewing and updating the crocodile management strategy early in the life of this plan. Section 9.1 of the management plan clearly recognises the risks that crocodiles pose to visitors and that the potential for increased interaction as the crocodile population expands. The risks of swimming in the park are actively communicated through prominent signs near water bodies and warnings in information provided to park visitors. Visitors are encouraged to use the public swimming pool at Jabiru or pools provided at hotels and other commercial accommodation.
Section 6.1 Destination and visitor experience development	6.1.16 addresses the promotion of events in the park. The NTG recognises that the development of events is an area of opportunity for PA and the Bininj/ Mungguy. There is an opportunity to engage the Bininj/ Mungguy in the development of cultural events which is an excellent way of involving them in enterprise development and, from a visitor perspective, would be a welcome addition to activity options in the park. The development of cultural events within the park also opens it up to new market segments such as the business events market.	No change to the plan. The opportunity to engage the Bininj/ Mungguy in the development of cultural events is noted.
Section 6.1 Destination and visitor experience development	The NTG strongly supports the action identified in section 6.1.19 with the additional emphasis on the requirement to invest in consumer research to assist in identifying product and marketing opportunities for the park.	No change to the plan. Covered by Action 6.1.19 that specifies that park management will 'Investigate opportunities to work with stakeholders or form partnerships to assist with this analysis.'
Section 6.2 Commercial tourism development and management	Under section 6.2.6, it should be noted that most commercial contracts and rate setting in the tourism industry is set 18 months in advance (especially for the international market).	No change to the plan. Covered by Policy 6.2.6 that the Director will as far as practicable inform the tourism industry with 12-18 months' notice when changes are made to visitor management in the park.
Section 6.2 Commercial tourism development and management	Similar to other sections, the draft management plan does not explain how the performance indicators will be measured based on the actions provided. The NTG recommends addressing how visitor satisfaction and commercial operator satisfaction will be measured.	No change to the plan necessary. This matter is covered in Section 6 Background text which states that visitor surveys provide useful information on visitor use of the park and satisfaction. Section 9.10 also provides for the development of a performance monitoring plan (Action 9.10.9) which will identify the measures for each of the performance indicators.

Plan reference	Comments in the submissions	Response
Northern Territory Government		
Section 6.2 Commercial tourism development and management	In relation to 6.2.3, the NTG recommends that appropriate platforms and support systems be made available to encourage joint business ventures between Bininj/Mungguy and commercial tourism operators.	No change to the plan. The potential for joint enterprise development will be investigated through the Visitor Experience / Precinct Planning process (Action 6.1.7).
Section 6.2 Commercial tourism development and management	Overall, the policy statements in this section which provide the context for commercial tourism appear restrictive, for example, policies 6.2.4 and 6.2.5. The NTG recommends that these policies be written in a way that is more welcoming and supportive of commercial investment.	No change to the management plan. Kakadu is a jointly managed park. Policies 6.2.4 and 6.2.5 are consistent with the aspirations of the traditional owners of the park.
Section 6.2 Commercial tourism development and management	While not the overriding intent of this action, 6.2.7 outlining extensions to the length of commercial licences provides a welcome incentive for operators and acts to reduce the red tape burden of applying for annual permits.	No change to the management plan necessary. Supportive comment.
Section 6.2 Commercial tourism development and management	In relation to 6.2.4, the NTG supports the intent of the policy, however understands that enforcing and monitoring will be difficult. The NTG has already commenced discussions with PA on strategies to address.	No change to the management plan necessary. Commentary only.
Section 6.3 Promotion and marketing	Based on the outcomes of recent consumer research informing the NT Government's tourism marketing strategy, KNP would benefit from marketing and promotion that increases the focus on highlighting the attractions and activities within KNP, rather than continuing to wrap up the attractions under 'Kakadu' without further explanation. It is about redefining KNP to show consumers how to create the perfect KNP holiday with a mix of accommodation, touring and things to do all set within a series of world class natural and cultural landscapes. The NTG welcomes continued collaboration with PA on the marketing of KNP to the domestic and international market.	No change to the plan. Covered by Action 6.3.3 where the Director will work with stakeholder groups to develop and implement a cooperative promotion and marketing strategy.

Plan reference	Comments in the submissions	Response
Northern Territory Government		
Section 6.3 Promotion and marketing	The NTG recommends greater use of consumer research to inform marketing strategies and experience development within KNP. Tourism NT has access to a range of research streams and can provide guidance on relevant consumer research to assist in informing a more visitor focused approach to park management. Tourism NT is also keen to work collaboratively with PA on tailored research programs to assist in informing a visitor focused approach to marketing and product development.	No change to the plan. Covered by Action 6.3.3 where the Director will work with stakeholder groups to develop and implement a cooperative promotion and marketing strategy.
Section 6.4 Visitor information	In relation to 6.4.11, the NTG supports PA endeavours to ensure tour guides are delivering accurate and appropriate information to visitors and understands that this is an ongoing challenge for the park due in part to a highly transient workforce. The NTG recommends consideration be given to introducing a refresher course to be delivered over the first three years to promote a continued and consistent level of quality interpretation among tour guides.	No change to the management plan necessary. Covered by action 6.4.11: Work with the tourism industry to ensure commercial tour guides are providing accurate and appropriate information to visitors, including correct interpretation of Bininj/Mungguy stories.
Section 6.4 Visitor information	In relation to 6.4.10, the NTG should be consulted with regard to the installation or otherwise of any signage on the NTG managed roads including as part of the 'Park signage project'.	No change to the management plan necessary. Through the Kakadu signage project consultation occurs with the Northern Territory Government. Policy 6.4.2 also commits the park to conforming with all Northern Territory and applicable signage standards and policies, where appropriate and relevant.
Section 8.1 Outstations and living on country	Although the draft management plan has provision for the establishment of new Outstations in KNP, the NTG is not in a position to support any additional Outstations under the NTG Homelands Program. Additionally, there is no provision within the NTG Homelands programs to support the establishment of new Homelands.	No change to the plan. Commentary only.
Section 8.2 Jabiru	The draft management plan does not address planning for the provision of electricity (and other services) to the Parks Australia assets in Jabiru following the scheduled closure of Ranger Uranium Mine. It is recommended the draft management plan acknowledge this and outline the planning that is being undertaken to address this issue.	No change to the plan. The plan is sufficiently enabling to allow the Board and the Director to make decisions about the future of services (such as electricity) for Parks Australia assets in Jabiru following the scheduled closure of the Ranger Uranium Mine.

Plan reference	Comments in the submissions	Response
Northern Territory Government		
Section 8.2 Jabiru	<p>The NTG supports all efforts to proactively plan for the transition of Jabiru following the cessation of mining and rehabilitation activities at the Ranger uranium mine. NTG comments are thoroughly consistent with the fact that the future of Jabiru is intrinsically linked to tourism therefore the accessibility and attractiveness of Kakadu NP to tourists and tourism operators will have a huge bearing on Jabiru’s economic activity.</p> <p>The NTG negotiations with the relevant Traditional Owners have resulted in an in-principle agreement on the future development of Jabiru township. Statements within the draft management plan should acknowledge this in-principle agreement and the existence of negotiations between the NT Government, the Mirarr people and the Director of National Parks. The NTG remains committed to a new head lease from the Aboriginal Land Trust that allows for the ongoing existence of the town, including the development of a new Planning Scheme for Jabiru.</p>	No change to management plan necessary. An in-principle agreement does not need to be referenced in the management plan.
Section 8.2 Jabiru	<ul style="list-style-type: none"> • Again, under the heading “Management issues” on (p.121), the statement “[T]he impacts of the town on Aboriginal people, lifestyles and traditions need to be minimised while the benefits of the town for Aboriginal people are maximised” is problematic. The current negotiations between the Northern Territory, the Mirarr People, the DNP and ERA include the preparation of a new head lease from the Aboriginal Land Trust to the Northern Territory, for the purposes of a town lease and the development of a new Planning Scheme for the Town. Fundamentally, the lease for the Town of Jabiru is to enable growth in the Town and a rental stream to the Land Trust. Is it proposed that this statement be read in the context of the proposed land tenure arrangements for the Town? Covenants of that nature are vague and likely to be unenforceable. 	No change to the management plan. The Kakadu Board of Management considers that it is true that the impacts of Jabiru on Aboriginal people, lifestyles and traditions need to be minimised while the benefits of the town for Aboriginal people are maximised.

Plan reference	Comments in the submissions	Response
Northern Territory Government		
Section 8.2 Jabiru	<ul style="list-style-type: none"> • (p.122) para 8.2.4 provides “The terms and conditions on any new lease or leases relating to the town must be consistent with the park’s values and minimising impacts on the environment, and include relevant obligations on the leaseholder.” <p>By way of comment, the NTA’s regulatory framework applies to the proposed headlease for Jabiru, as does the EPBC Act. The NTA’s obligations are to comply with relevant laws. The NTA may pass on obligations but will not otherwise be responsible for active management. Any such obligations on the NTA are inappropriate and vague with respect to enforceability (eg how would a determination be made whether the NTA has breached park values etc), particularly where a sublessee is effectively an ‘owner.’ The DNP would need to deal the two issues identified by way of legislation, noting development within the Town lease area must comply with the Planning Scheme approved by the DNP under the EPBC Act.</p> <ul style="list-style-type: none"> •(p.122) para 8.2.5 Refer comments above. 	<p>No change to the management plan. Policy 8.2.4 requires that the terms and conditions of any lease and/or sublease relating to the town must be consistent with the park’s values and minimising impacts on the environment, and include relevant obligations on the leaseholder(s). The inclusion of Policy 8.2.4 is entirely consistent with the responsibilities of the Director of National Parks.</p>
Section 8.2 Jabiru	<p>The NTG recognises a wide range of stakeholders have an interest in the outcome of the transition of Jabiru, including the operators of businesses in both the township and the park. In order to maintain the confidence of the operators of tourism businesses through the transition, the NTG strongly recommends the draft management plan requires this group be consulted and kept fully informed of the aims and objectives of the transition. As part of the changes that will take place in Jabiru with the finalisation of the Native Title settlement and potential departure of ERA, the NTG would welcome the inclusion of a policy statement that engenders interest in planning for new developments and opportunities in the township.</p>	<p>No change to the management plan is necessary. The Director of National Parks is not responsible for the development of facilities within Jabiru. Rather the plan specifically notes as a management issue in Section 8.2 Jabiru 'that the town should not impact on the Director's resources to the potential detriment of other areas of the park'.</p> <p>The plan does however recognise that Parks Australia will continue to monitor visitor needs to inform decisions about investment and upgrade opportunities for visitor facilities (action 6.1.9).</p> <p>Section 9.7 discusses the closure of Ranger and the rehabilitation of the mine site by ERA (not likely to be completed within the life of this plan). There is also a policy to work with stakeholders to minimise the potential impacts of this transition - see action 9.7.4.</p> <p>9.7.4 The Director will work with relevant agencies and stakeholders to minimise potential adverse impacts on the park arising from the reduction or cessation of mining operations in the neighbouring Ranger project area.</p>

Plan reference	Comments in the submissions	Response
Northern Territory Government		
Section 8.2 Jabiru	<ul style="list-style-type: none"> •(p.123) para 8.2.10 – Query whether the DNP’s approval or proceeding with a proposed action includes the approval of a new headlease and Town plan. 	No change to the management plan. Policy 8.2.10 applies to the Director's approval of all proposed actions, so logically it does apply to the approval of a new head lease for Jabiru. However it is Policy 8.2.4 that applies specifically to leases. It requires that the terms and conditions of any lease and/or sublease relating to the town must be consistent with the park’s values and minimising impacts on the environment, and include relevant obligations on the leaseholder(s). The inclusion of Policy 8.2.4 is entirely consistent with the responsibilities of the Director of National Parks.
Section 8.2 Jabiru	The NTG requests that the draft management plans avoid establishing a consultative process for Jabiru in addition to or separate from any consultative process established and agreed between the Mirarr People (as lessor) and the NTG(as lessee).	No change to the management plan. Policy 8.2.9 states that the Director will consult and if possible reach agreement with the Mirrar people before approving a new town Planning Scheme prepared by the NTG.
Section 9.04 Capital works and infrastructure	In action 9.4.11, it is noted that a Memorandum of Understanding is to be developed with the NTG regarding the management of roads in the park and to work with them to develop and implement a road management strategy for the park. The development of this MoU is welcomed and it should be noted that there has been significant effort on the part of the NTG to advance this arrangement.	No change to the management plan. Supportive comment.
Section 9.04 Capital works and infrastructure	The current (fifth) Management Plan for KNP policy restricts the upgrading of the Magela Crossing on the Oenpelli Road to bed level crossing unless higher standards were approved by the Traditional Owners. The future standards of the Magela Crossing and the effective management of areas north of the crossing to alleviate the traditional owners concerns should be addressed in the sixth plan. The NTG has highlighted the need to upgrade the crossing of the East Alligator (Cahills Crossing) to provide improved community access to Arnhem Land.	No change to the plan. The plan does not restrict future upgrades to the Magela Crossing.
Section 9.05 Assessment of proposals	Under the draft management plan, proposals and activities within the park may be subject to both decision making processes under section 9 (Environmental assessment process) and section 4.1 (Board of management decisions). The NTG questions whether there is the potential for a dual assessment process for Development Consent Authority with respect to the town as this is potentially burdensome and is not recommended.	No change to the plan. Proposed activities are considered by a single environmental impact assessment process which is outlined in Section 9.5 and includes the decision-making process identified in Table 3.

Plan reference	Comments in the submissions	Response
Northern Territory Government		
Section 9.05 Assessment of proposals	A range of administrative matters concerning work undertaken within the park by NT Government agencies are highlighted as opportunities for park management to streamline the operation of the park.	No change to the management plan necessary. Supportive comment. The management plan is an enabling document and it specifically includes a number of actions to improve and streamline management arrangements (see for example Actions 8.2.5 and 9.3.4) and to further develop cooperative management arrangements with the NTG (see for example action 9.4.11).
Section 9.08 Revenue and Business Development	The NTG strongly supports action 9.8.6, and recommends this be made a key priority, as the current method of ticketing is inefficient and the park is losing out on entry fees. In addition, visitor data collection could be improved if a new method of entry pass was put in place.	No change to the management plan necessary. Supportive comment.
Section 9.08 Revenue and Business Development	The NTG supports the park becoming more commercial in its approach as outlined in action 9.8.5.	No change to the management plan necessary. Supportive comment.
Section 9.08 Revenue and Business Development	In relation to action 9.8.7, the NTG supports the exploration of revenue generating opportunities for the park, however it is important that any fees be referenced to other parks jurisdictions and balanced with the desire to increase visitation.	No change to the management plan necessary. Supportive comment.
Section 9.08 Revenue and Business Development	The NTG supports action 9.8.3 and recommends further collaboration with Tourism NT and NT Parks and Wildlife to identify successful models based on previous experience in the market. Consideration may also be given to promoting a general Expression of Interest process for certain sites to open it up development ideas from investors (in line with park values). This may produce a broader range of ideas and make it more attractive for investors.	No change to the management plan necessary. Supportive comment.
Section 10.3 Living in the park (outstations and Jabiru)	Note regarding the draft management plan structure: The NTG recommends that section 10.3 be integrated into sections 8.1 and 8.2 to reduce overlap and repetitiveness.	No change to the plan. Comment noted. Sections maintained separately as section 8 sets out the policies for Jabiru, outstations and living in the park, while section 10 sets out the policies for use of the park.
Section 10.4 Access	For commercial tour operators, appropriate access to the park is critical. 10.4 identifies three policies around restrictions and closures of access roads. The NTG recommends inclusion of an additional policy or principle that gives commercial tour operators confidence that access roads will be opened at the first opportunity after seasonal closures. Refer to comments regarding access in section 6.	No change to the plan necessary. The matter is covered by Section 6.1 that includes prescriptions e.g. 6.1.17, 6.1.18 that will try to ensure that public areas are open for as long as possible, particularly early in each year and consideration of implementing staged opening of sites during the shoulder seasons.

Plan reference	Comments in the submissions	Response
Northern Territory Government		
Section 10.5 Commercial use of resources	The NT Government's Department of Land Resource Management is willing to assist with the development of sustainable wildlife use enterprises within the park, as appropriate.	Commentary only. No change to the plan necessary.
Section 10.7 Recreational activities	In relation to policy 10.7.4, the NTG recommends that overnight bushwalks be better promoted. The NTG is not averse to PA exploring opportunities to obtain a commercial income from activities such as overnight walks as long as visitors are presented with a value for money experience proposition that is comparable to walking experiences available in other destinations. For example, walking experiences may be 'packaged' with maps, trail notes, park entry and overnight camping fees as they are in other destinations.	No change to the plan. The park does not provide a map of approved routes and campsites on-line because overnight bushwalking, and bushwalking in remote and off-track areas in Kakadu presents a much higher level of risk to visitor safety than marked walks. These walks can be physically demanding and require a high level of navigation skills. By not advertising the routes, people are required to do their own research and talk to local clubs to find out about the routes. Applicants need to demonstrate they meet the required level of preparedness and skill before a permit can be issued. Opportunities to increase revenue will be considered in accordance with Section 9.8 Revenue and business development.
Section 10.7 Recreational activities	The NTG encourages and notes the commitment for ongoing consultation with recreational fishing stakeholder groups such as Amateur Fishermen's Association of the Northern Territory on all matters related to recreational fishing (possession limits, access /boat ramps etc).	No change to the plan. Supportive comment.
Section 10.7 Recreational activities	In relation to crocodile management policies 10.7.11, 9.1.4 and 9.1.11, the NTG will continue to liaise with Parks Australia to promote a consistent approach to the management of saltwater crocodiles within the park and the Top End, and incorporate monitoring data from KNP into broader scale monitoring of crocodile populations.	Commentary only. No change to the plan necessary. This matter is covered by Section 9.1 and the Crocodile Management Strategy (Action 9.1.12).
Section 10.7 Recreational activities	The NTG recommends that the activities outlined in policy 10.7.7 be included in a new business prospectus in order to promote the opportunities to commercial operators.	No change to the management plan is necessary. Action 10.7.7 allows for the authorisation of a range of activities involving light aircraft, airboats, amphibious vehicles, hovercraft and non-motorised vessels in the park. These activities will be approved under permit. The review of the Tourism Master Plan and visitor precinct planning allow for the consideration and potential promotion of these activities.

Plan reference	Comments in the submissions	Response
Northern Territory Government		
Section 10.7 Recreational activities	Policy 10.7.21 has the potential to impact on recreational fishing visitor itineraries. For example, a visitor travelling across the NT in a 4WD vehicle equipped with fishing gear including nets and crab pots is not permitted to take their vehicle to a place such as Jim Jim Falls unless first a special permit is granted by the Director.	No change to the plan. Nets, traps and pots cannot be used within the park but may be transported on the major roads in the park and downstream of boat ramps on the East Alligator and South Alligator rivers provided they are securely stowed, covered and not ready for use. The management plan thus caters for the majority of recreational fishers that wish to travel into Arnhem Land to fish with nets, traps and pots. The management plan simply requires recreational fishers in possession of nets, traps and crab pots who do wish to tour Kakadu during their itinerary, apply for a permit with relevant conditions on the prohibition of their use in the park.
Section 10.7 Recreational activities	A suggested alternative to policy 10.7.21 is to conduct a trial allowing carriage of these items while continuing to prohibit (and monitor) their use in conjunction with relevant warning signage. See comments in s.10.10 below.	No change to the plan. Nets, traps and pots cannot be used within the park but may be transported on the major roads in the park and downstream of boat ramps on the East Alligator and South Alligator rivers provided they are securely stowed, covered and not ready for use. The management plan thus caters for the majority of recreational fishers that wish to travel into Arnhem Land to fish with nets, traps and pots. The management plan simply requires recreational fishers in possession of nets, traps and crab pots who do wish to tour Kakadu during their itinerary, apply for a permit with relevant conditions on the prohibition of their use in the park.
Section 10.7 Recreational activities	Policy 10.7.18 lacks certainty as to the process through which a permit requirement or authorisation for recreational fishing would be imposed. The NTG recommends PA develops and includes a list of potential guidelines which would be considered by the Board before they make a decision in accordance with this policy. These guidelines would assist in providing clarity around potential reasons for restrictions, and assist in communications of any resulting permit requirements of tourism operators and visitors.	No change to the plan. Action: 10.7.18 If the Board considers it is necessary <u>to more closely manage the impact of recreational fishing</u> the activity will require a permit or other authorisation from the Director. Underlined text identifies the circumstances in which any permit of authorisation system would be introduced by the Board. The management plan also includes action: 6.1.11 Undertake a review of fishing and boating in the park to provide recommendations to the Board on the future management options and implement supported recommendations as appropriate (see also section 5.3.42).

Plan reference	Comments in the submissions	Response
Northern Territory Government		
Section 10.8 Commercial tourism and accommodation	The background on (p.174) includes reference to park guidelines which set limits on visitors or tour operators that can access certain areas. If these guidelines are implemented to reduce visitor numbers at certain sites, the NTG strongly recommends that new sites are opened up in the park to balance this out and to ensure that it is accommodating to all visitors.	No change to the plan. Guidelines which set limits on numbers of visitors or tour operators that can access certain areas are used to allow continued public access to sensitive areas whilst minimising the impact on the environment and contributing to the experience of those who access the area. Decisions about access to new areas need to be made in consultation with Bininj/Mungguy (Section 4.2) and are considered during the precinct planning process (Action 6.1.7).
Section 10.8 Commercial tourism and accommodation	The draft management plan outlines some discrete additions to potential commercial opportunities in the park, some of which will require infrastructure investment. This in turn offers joint venture or new business opportunities. These need to be explored further in the Kakadu National Park Tourism Masterplan development and highlighted as a positive step forward.	No change to the plan. Commercial opportunities in the park, and associated infrastructure development will be considered through the review of the tourism master plan (action 6.1.6) and the development of precinct plans for visitor sites (action 6.1.7).
Section 10.8 Commercial tourism and accommodation	In relation to policy 10.8.2 (and related policies), the NTG recommends that the policy include language that promotes working with businesses operating or considering operating in the park. There is opportunity to encourage businesses to work in KNP by reducing red tape and streamlining processes.	No change to the plan. Sections 6.1 and 6.2 clearly demonstrates the park's commitment to developing commercial and tourism activities in the park. Action 9.3.4 also commits to reviewing and, where possible, improving systems for the processing, administration and management of permits, licences and leases/subleases.
Section 10.8 Commercial tourism and accommodation	In relation to policy 10.8.9, while the NTG understands that voluntary industry accreditation can assist businesses to improve outcomes, it is important to consider the regulatory environment within which businesses are operating. Given the requirements for management plans, permits, licences and compliance with existing legislation, the requirement for compulsory business accreditation may unnecessarily add to red tape for business.	No change to the plan. It was considered that Policy 10.8.9 should not be amended. It will continue to be compulsory to have industry-based accreditation to conduct tour operations, except for standard tours conducted under a one-year permit. Voluntary industry accreditation gives us assurance that we have operators with high standards for exclusive and restricted activities managed under licence and for operators who wish to get a three-year permit. Otherwise non-accredited operators can still access a one-year permit. Given the high numbers of accredited operators these days it is unlikely to be a real burden, and actually assists operators to make sure they have good business practices in place which adds to the success of their business.

Plan reference	Comments in the submissions	Response
Northern Territory Government		
Section 10.8 Commercial tourism and accommodation	In regard to the section on Commercial accommodation (p.176), the NTG strongly supports encouraging both new accommodation in the park and also upgrades to existing products. Current products are tired with the only new investment in recent history being Anbinik.	No change to the plan. Section 6.2 of the management plan indicates that there are opportunities to develop and improve commercial accommodation within the park. However the park itself does not provide any commercial accommodation facilities and is dependent upon accommodation providers investing in the park. Visitor experience plans for each precinct will investigate opportunities for accommodation within the park and where necessary an expression of interest process will apply to attract suitable proponents.
Section 10.10 Commercial fishing	The NTG encourages ongoing consultation with fishing tour operators through the Northern Territory Guided Fishing Industry Association and commercial fishing operators through the Northern Territory Seafood Council.	No change to management plan necessary. The management plan commits in section 9.7 to maintaining good working relationships with stakeholders and to consult with stakeholders as far as practicable, on the development of management strategies, guiding documents, and on determination/decisions that may impact on them.
Section 10.10 Commercial fishing	The commercial industry would like the ability to transport product and gear from fishing grounds in Minimini / Murgarella system through the South Alligator to vehicle transport on the Arnhem Highway. The park no longer allows such activity. The NTG considers that arrangements could be developed that provide appropriate safeguards to ensure that legally caught fish can be transported through the park without compromising the potential for illegal activity and the NTG Department of Primary Industries and Fisheries would be happy to work with KNP to develop appropriate safeguards.	No change to the plan. The Board resolved not to support the transit of commercial fishing vessels down the South Alligator River for the purpose of unloading their catch to road transport on the Arnhem Highway. The Board considered that the transport of commercial fish down the South Alligator River would require significant additional compliance effort and the infrastructure necessary to support the unloading of catch by commercial fishing operators was not available on the South Alligator River.
General comment	In summary, the NT Government response highlights the importance of Kakadu National Park to the Northern Territory and reinforces its multiple roles: o a conservation asset befitting of its world heritage status o home to the Bininj/ Mungguy, the traditional owners who live on what is now recognised as an internationally significant cultural landscape o an iconic tourism destination for visitors that is a key driver of visitation to the region	No change to the management plan necessary. Supportive comment.

Plan reference	Comments in the submissions	Response
Northern Territory Government		
General comment	The adoption of a values based-approach to planning and the application of a formal Management Effectiveness Framework is commended as it delivers a greater degree of accountability into the draft management plan than previous versions by tying actions to evidence-based measures of progress (performance indicators). However, the outcomes and performance indicators described in the latest draft management plan are both high-level and generic. In addition, the sheer number of indicators cited in the draft management plan will undoubtedly result in a significant impact on resourcing and potentially burdensome reporting requirements.	No change to the plan. The performance indicators in the plan ensure a broad range of aspects of management can be monitored to help determine management effectiveness. Under the plan, a performance monitoring plan is prepared (Action 9.10.9) which describes performance monitoring for the park at a more detailed, prescriptive manner.
General comment	The NT Government commends the adoption of a values based-approach to planning and the application of a formal Management Effectiveness Framework as it provides a mechanism for increasing the park management's accountability for outcomes, a key area of concern from previous plans.	No change to the plan. Supportive comment.
General comment	In keeping with its earlier submission, the NT Government response highlights that the plan does not adequately address issues associated with how the park fits into its broader NT context. Of particular concern is a lack of detailed explanation on how the park will develop and manage the infrastructure needed to facilitate visitor access and how forthcoming changes to the Ranger uranium mine and the township of Jabiru will be managed.	No change to the plan. The development of new visitor infrastructure will be addressed through visitor experience planning carried out under section 6.1 of the management plan. Maintenance of existing visitor infrastructure is covered by Section 9.4, including the establishment of new infrastructure. A number of strategies, plans and related documents are established under the plan which define activities that will occur within the life of the plan, or investigate options for future growth and development of the park as part of the Northern Territory visitor destination.
General comment	9.10.8 states the intent 'Within the first 12 months of the plan, to identify the measures that will be used to monitor each performance indicator in the plan and the targets that will be reported against, and then annually report against the performance indicators.' The NTG recommends that PA consider prioritising critical indicators to be included in the draft management plan and the relevant subordinate strategies, and introducing a classification system for indicators (eg. level 1 or level 2 etc) to indicate the reporting frequency requirements as a way of reducing the reporting impost. For example, some indicators may only require reporting every two years.	No change to the plan. The performance indicators in the plan ensure a broad range of aspects of management can be monitored to help determine management effectiveness. Under the plan, a performance monitoring plan is prepared (Action 9.10.9) which describes performance monitoring for the park at a more detailed, prescriptive manner and will include reporting frequency.

Plan reference	Comments in the submissions	Response
Northern Territory Government		
General comment	<p>Notwithstanding, the NT Government response expresses concern that KNP faces a number of serious ongoing management challenges which are not adequately addressed in the draft management plan.</p> <p>These challenges include:</p> <ul style="list-style-type: none"> o unrealised tourism potential in terms of overall park visitation and in the delivery of new/ upgraded tourism experiences and commercial development aligned to park values o a lack of participation and engagement, and unmet realisation of economic and social outcomes for the Bininj/ Mungguy o the retention of key natural values due to threats from fire, pests, weeds and climate change o the protection of key cultural heritage assets including rock art and sacred sites. 	<p>No change to the plan. These matters are addressed in the plan as follows:</p> <p>Tourism potential (Section 6)</p> <p>Significant investment is continuing in this area through the development of visitor experience assessments and visitor experience plans for each district of the park. Through this a range of potential developments and experiences are identified and from there the park will examine what it can do to realise these visions, and who can be approached for establishing tourism experiences and infrastructure.</p> <p>Indigenous engagement and benefits (Section 4)</p> <p>Section 4 of the plan clearly addresses these concerns and other sections of the plan include indigenous engagement. Parks Australia is undertaking a Joint Management Futures project where it is working with land councils, indigenous organisations and representative groups and the Board of Management to determine how to improve engagement and benefits to the Indigenous community.</p> <p>Conservation of Natural and Cultural Values (Section 5)</p> <p>This is the first values-based management plan prepared by Parks Australia. It recognises the natural and cultural values of the park and describes actions and policies that work towards their conservation, management and presentation to visitors. Additional actions are also prescribed within policies, procedures, strategies and plans that the park develops with the assistance of experts in their field. The plan is not a prescriptive plan, and if all activities were described within the management plan it would be a very extensive document. The development of management strategies allows an adaptive approach.</p>
NT Seafood Council		
Section 10.10 Commercial fishing	<p>10.10.3 The NTSC supports existing arrangements and wording of 10.10.3 for the transport through the park along the Oenpelli Road, Arnhem Highway and Kakadu Highway of vessels, dinghies, fishing gear and fish and crabs caught for commercial purposes.</p> <p>As detailed above this provision plays a critical role for both industry and the wider community with regard to access to local seafood and it is critical that transport of product and gear through the Park is sustained.</p>	No change to the management plan necessary. Supportive comment.

Plan reference	Comments in the submissions	Response
NT Seafood Council		
Section 10.10 Commercial fishing	<p>To ensure all users of the park have the same understanding, section 10.10 should acknowledge that transit of commercial fishing boats can occur from the mouth of the East Alligator River inland to Coopers Creek provided transit is above the mean low water mark of the eastern bank of the East Alligator River.</p> <p>Recommendation: Wording is included within section 10.10 to note that commercial fishers are permitted to transit from the mouth of East Alligator River, above the mean low water mark of the eastern bank inland to Coopers Creek.</p>	<p>No change to the plan.</p> <p>Holders of fishing concessions to operate in Coopers Creek are already aware of the location of the park boundary along the East Alligator River and there is no need to provide further information in the management plan.</p>
Section 10.10 Commercial fishing	<p>The Northern Territory Seafood Council recommends that the Section 10.10.1 is amended to state as it stated in the previous plan (under section 5.10.10) that:</p> <p>“Commercial fishing vessels may enter the Park for emergency purposes.”</p> <p>In an emergency at sea, more often than not physical danger to either vessel or crew dictates what can or cannot be done in relation to dealing with gear aboard the vessel while trying to steer that vessel to sheltered waters or a safe anchorage. Seeking to reach sheltered waters no matter where they are and or what the condition of fishing gear is on board is the key priority in an emergency. As there are no wharves or jetties in Kakadu for commercial fishing vessels the only practical way to access the shore from a vessel would be by dinghy.</p> <p>Currently due to the reference to 10.10.2 and 10.10.3 the proposed 10.10.1 policy is impractical and if implemented would pose additional risk to crew in the event of an emergency.</p> <p>Recommendation: 10.10.1 be amended to read “Commercial fishing vessels may enter the Park for emergency purposes.”</p>	<p>No change to the plan necessary.</p> <p>Policy 10.10.1 refers to entry of commercial fishing vessels for emergency purposes.</p>
Section 10.10 Commercial fishing	<p>It would be unfortunate for visitors who experience the wonderful natural and cultural experiences offered by a visit to Kakadu National Park to find only imported seafood on the restaurant menu. Provisions that provide transport for seafood product and gear through the park play a critical role to ensuring a consistent and sustainable supply of fresh seafood to NT residents and visitors.</p>	<p>No change to the plan.</p> <p>Policy 10.10.3 refers to provisions for transport for seafood product and gear through the park.</p>

Plan reference	Comments in the submissions	Response
NT Seafood Council		
Section 10.10 Commercial fishing	<p>Since the creation of Kakadu National Park, the Northern Territory Seafood council has supported the policy of no commercial harvesting of fish and crustaceans within the Park’s boundaries. In fact the NTSC’s only life member and former commercial fishing licensee, Mr Graeme McMahon, was one of the two key people whose campaigning resulted in the creation of Kakadu.</p> <p>10.10.2 (a) has further defined “securely stowed” to read “covered and not ready for use” which may be an impractical burden. NTSC support the principle that gear being transported through the park should be securely stowed and recommends that the wording remain unchanged from the previous management plan.</p> <p>Recommendation: the words “covered and not ready for use” are removed from 10.10.2 (a).</p>	<p>No change to the plan.</p> <p>Expansion of the definition of “securely stowed” to include “covered and not ready for use” provides further clarification for commercial fishers transporting product and gear through the park.</p>
Section 10.10 Commercial fishing	<p>To further support the industry in providing a more consistent supply of fresh seafood to NT markets replicating the transport provisions available for recreational fishing would be beneficial. Specifically it is recommended to include a provision for a permit to transit seafood product and gear along the South Alligator to vehicle transport on the Arnhem Highway.</p> <p>The provision of this option would provide benefit to the Territory through the provision of additional access to infrastructure and provide commercial opportunities to remote operations in the Northern Territory seafood industry.</p> <p>Recommendation: An additional policy be inserted to allow for the transport of seafood product and gear along the South Alligator to vehicle transport on the Arnhem Highway.</p> <p>Recommendation: Insert “10.10.4 Fish and crabs caught for commercial purposes outside the park, and nets, traps and other equipment used for the purposes of commercial fishing, may be transported along the South Alligator river downstream of boat access to vehicle transport on the Arnhem Highway in accordance with a permit issued by the Director.”</p>	<p>No change to the plan.</p> <p>The Board resolved not to support the transit of commercial fishing vessels down the South Alligator River for the purpose of unloading their catch to road transport on the Arnhem Highway.</p> <p>The Board considered that the transport of commercial fish down the South Alligator River would require significant additional compliance effort and the infrastructure necessary to support the unloading of catch by commercial fishing operators was not available on the South Alligator River.</p>

Plan reference	Comments in the submissions	Response
Darwin resident 1 - Bushwalker		
Section 5.1 Looking after culture	5.1.14 Agree with (c) installation of signage where appropriate to indicate restricted access (d) identification of cultural sites near or on approved or proposed bushwalking routes	No change to the plan. Supportive comment.
Section 5.2 Looking after country	5.2.3 and 5.2.4 Elimination of feral animals (buffalo and pigs) and plants (mimosa) should be a high priority as they pose an environmental risk.	No change to the plan. This matter is covered by Sections 5.2 and 5.3 which identify that management of weeds and ferals is a priority. Elimination of these species would be difficult if not impossible and is not realistic.
Section 5.3 Managing park wide threats	To ensure 'preservation of the area in its natural condition' feral animals must be managed. Over the years the number of buffalo, pigs and cane toads has increased to devastating environmental proportions. Almost all waterways are infested with pigs. Control of these ferals should be a major focus of park management. Brumbies are also present.	No change to the plan. Covered by Section 5.3 and Policies and Actions 5.3.9 through to 5.3.16
Section 5.3 Managing park wide threats	Fire. Each area should be subjected to fire at a frequency that maintains the natural biodiversity of the Park – I would suggest no more frequently than every 5-7 years. The results of frequent firing along roadways reduces visitor enjoyment. Prevention of unauthorised/unplanned fires should be a major priority.	No change to the plan. Covered by Section 5.3 and Policies and Actions 5.3.17 through to 5.3.27. The park is currently working with fire experts to update the fire management strategy including fire frequency.
Section 6.1 Destination and visitor experience development	6.1.14 Management could consider removing the permit system for bushwalking/overnight camping within the Park. Walking routes would need to be monitored to determine the need for toilets etc. (This is not currently a problem – information pamphlets could include hygiene guidelines).	No change to the plan. Unsupported bushwalks in the park present a high level of risk to visitor safety and require a high level of experience. The permit system (managed in accordance with Section 9.3) provides a way of managing the number of walkers, their routes and safety, and helps to protect the park values.
Section 6.1 Destination and visitor experience development	To 'encourage appropriate use, appreciation and enjoyment of the park by the public' walking and bushwalking should be facilitated. There should be more walks, tracks and multi-day routes available, particularly more day walks (around 15 km) along marked trails. In Kakadu support services such as water and shelters are not required. However management would need to maintain signage and markers (on such tracks).	No change to the plan. Covered by Actions 6.1.7 and 6.1.10 where opportunities for more walking routes throughout the park will be considered in the walking strategy and through the precinct planning process.

Plan reference	Comments in the submissions	Response
Darwin resident 1 - Bushwalker		
Section 6.1 Destination and visitor experience development	Declining visitation to the Park could also be due to limited opportunities within the Park, restrictive practices and lack of walking/camping permit availability. Visitors will be active ambassadors for the Park if they themselves have a positive experience.	No change to the plan. Covered by Action 6.1.8 to investigate, develop and implement strategies to increase visitation to the park.
Section 6.1 Destination and visitor experience development	6.1.2 Information should be provided to inform visitors' decisions about an activity. Acceptance of risk is the responsibility of the visitor.	No change to the plan. Covered by Section 6.4 to enrich visitor experiences through quality interpretation and information. Action 6.4.4 continues to provide up-to-date information to visitors using a variety of means.
Section 6.1 Destination and visitor experience development	Management should consider removing the permit system (as in NZ) as this is not currently facilitating use of the Park. In recent years local walkers have found it increasingly difficult to get a permit. Information about multi-day routes of various lengths (for experienced walkers and navigators) but with no support services should be readily available online and at Park Headquarters. Such routes would, of course, avoid known sites of cultural significance.	No change to the plan. Unsupported bushwalks in the park present a high level of risk to visitor safety and require a high level of experience. The permit system (managed in accordance with Section 9.3) provides a way of managing the number of walkers, their routes and safety, and helps to protect the park values. For these reasons overnight bushwalks are not promoted on the park website, however, interested walkers can make enquiries at the park.
Section 6.4 Visitor information	The responsibility of Management is to provide appropriate advice. Walkers accept all other responsibility.	No change to the plan. Covered by Section 9.1 Safety and incident management which includes communication with visitors. Also covered by Policy 6.3.1 where the park is promoted and marketed in accordance with key messages including visitor safety and; Action 6.4.4 which will ensure up to date information is provided to visitors through a variety of means.
Section 6.4 Visitor information	Appropriate information online, on signage at the commencement of walks and in the form of brochures available at the walk, at Park Headquarters and Tourist facilities is needed. This would include information about walks, conditions and guidelines for visitors. Such a system operates successfully in New Zealand; the DOC classify tracks according to features including level of difficulty, fitness required and recommended footwear. (Thongs frequently seen on visitors attempting short walks in Kakadu are never recommended in NZ).	No change to the plan. Kakadu has a range of marked walks which offer a variety of experiences and challenges. Information about these day walks is readily available online, in brochures and on signage, however visitors may choose not to follow the recommendations in terms of appropriate clothing and footwear. The new Walking Strategy (Action 6.1.10) will include more information on grading of walks according to national and international standards.
Section 6.4 Visitor information	It is essential that information on the website is current and accurate. River heights change daily in the Wet season and do need to be updated daily on all sections of the website.	No change to the management plan. The management plan includes a specific action on providing up to date information to visitors (6.4.4).

Plan reference	Comments in the submissions	Response
Senior Research Fellow, Charles Darwin University		
Section 10.7 Recreational activities	- Caps should be placed on the number of boats permitted in recreational fishing competitions.	No change to the plan. This issue will be considered in the review of fishing and boating (Action 6.1.11) which may consider the introduction of ceilings on the number of participants, through a permit condition, in consultation with competition organisers.
Section 10.7 Recreational activities	- All sharks should be complete protected no-take species in the park to overcome any potential misidentification of other species (such as bull shark) with the threatened and protected river sharks (Glyphis species)	No change to the plan. This issue will be considered in the review of fishing and boating in the park (Action 6.1.11).
Section 10.7 Recreational activities	Regarding recreational fishing and boating for managing impact and potential pressures on threatened species: - A recreational fishing permit system should be put in place to monitor and control the fishing effort within the park	No change to the plan. Compliance and enforcement patrols are conducted to monitor illegal fishing activities in the park. A permit system will be considered in accordance with the review of fishing and boating (Action 6.1.11).
Section 10.7 Recreational activities	- Signage should be implemented at the South Alligator and East Alligator boat ramps, and at West Alligator Head on the identification and protected status of threatened river sharks (Glyphis species) and sawfishes (Pristis species)	No change to the plan. This issue will be considered during the review of fishing and boating in the park (Action 6.1.11) and future signage for the boat ramp areas.
Section 10.7 Recreational activities	- The addition of the Wildman River as a closed area to boating and fishing may be a suitable future conservation measure as boating and recreational fishing activity increases.	No change to the plan. Restrictions on the areas accessible for fishing and boating are regulated through determination made by the Director or her delegate and do not need to be prescribed within the plan. This issue will be considered during the review of fishing and boating in the park (Action 6.1.11).
Section 10.7 Recreational activities	- The West Alligator River should remain closed to access as a vital conservation asset.	No change to the plan. The West Alligator River is closed to fishing and boating access. Restrictions on the areas accessible for fishing and boating are regulated through determination made by the Director or her delegate and do not need to be prescribed within the plan.
Appendices	Yellow Chat (Alligator Rivers subspecies) should be added to the list of birds as one of the most relevant birds of conservation concern in the park.	No change to the plan. The yellow chat (alligator Rivers) <i>Epthianura crocea tunneyi</i> is already listed in Appendix J. Appendix A cannot be amended as it a direct transcript of the World Heritage Values. Appendix B (Ramsar values) includes the yellow chat.

Plan reference	Comments in the submissions	Response
Senior Research Fellow, Charles Darwin University		
Appendices	The text 'fish (such as two newly discovered taxa of goby, including the new genus <i>Cryptocentrus</i> , and a speartooth shark <i>Gyphis</i> sp);' should be changed to: 'fish (such as two newly discovered taxa of goby, including the new genus <i>Cryptocentrus</i> , two river shark species (<i>Gyphis</i> spp), and two sawfish species (<i>Pristis</i> spp);	No change to the plan. Appendix A cannot be amended as it a direct transcript of the World Heritage Values.
Chair, Barramundi Licence Committee - Northern Territory Seafood Council		
Section 10.10 Commercial fishing	Transport fresh fish up the South Alligator River and then to Darwin (First big dinghy) - (Truck second)... Truck fresh (not frozen) fish (although frozen could go too) to Darwin from the landing... How could it be done: 1) Notify Kakadu management and fisheries dept of request and time and date. 2) Maybe names of those involved. 3) Soon we hope transponders will be on dinghies etc. 4) As such it would be hard to break any laws, and with modern communications technology it would be easy to do logistically. 5) Have the truck waiting. 6) We are willing to accommodate any reasonable requests from park management, fisheries Dept or Government.... if you have a net in your dinghy above a closure line it is the same as illegal fishing, and is a prescribed offence....why do we want to use the South Alligator: commercial fishing is only allowed from the Wildman East Bank to Murganella. People now unload at the Mary River system and the amateurs are screaming their lungs out to stop this. Also it is too far from say Murganella especially in rough weather...So the South Alligator which is mid-way between fishign grounds is a logical choice... why do we want to get fresh fish to Darwin....everybody wants to buy whole barra on ice...they want to poke the fish, smell, look at the eyes and think because it has not been frozen it is the best fish they can buy.	No change to the plan. The Board resolved not to support the transit of commercial fishing vessels down the South Alligator River for the purpose of unloading their catch to road transport on the Arnhem Highway. The Board considered that the transport of commercial fish down the South Alligator River would require significant additional compliance effort and the infrastructure necessary to support the unloading of catch by commercial fishing operators was not available on the South Alligator River.

Plan reference	Comments in the submissions	Response
Humpty Doo Resident 2		
Section 5.3 Managing park-wide threats affecting values	In the 40 plus years that I have enjoyed the use of the Park, some significant changes have been observed since the removal of feral buffaloes. Camping areas that used to be a lovely shaded oasis have turned into weed infested areas, particularly sida sp. Our first trip of the year into these places results in a vigorous weed pulling exercise. Feral horse populations have continued to grow despite Park Management's efforts or lack of. The perception amongst the public is that perhaps the feral horses have gained some sort of "protected" status.	No change to the plan. Covered by Policies and Actions 5.3.9 to 5.3.16 to minimise the impacts of feral animals on park values. A park-wide feral animal control exercise was conducted in 2008–09 and since then most feral animal control programmes have focused on strategic areas of high risk rather than taking a park-wide approach, due to limited budgets.
Section 5.3 Managing park-wide threats affecting values	5.2.10 Manage fires..... All the grass fires that I have actually seen lit and they would only be a handful, have been by indigenous persons. Unfortunately I have no way of knowing if they are authorised or not. Does Park Management have a system for identifying persons authorised to light fires in the Park?	No change to the plan. Covered by Action 5.3.26 through the development and implementation of an education and communication programme for residents, contractors, tour operators and park visitors on fire and Action 5.3.27 on engaging resident Bininj/Mungguy to attract their active support for preventing and reporting unplanned ignition, the impacts and responsibilities.
Section 6.1 Destination and visitor experience development	10.2.1 (a) and (b) Park management's practice of herding campers into small areas has contributed to the unhygienic state, as witnessed by the profusion of toilet paper, and the lack of firewood, as witnessed by the lack of dead trees and the number of damaged live trees.	No change to the plan. The park has four types of camping areas including commercial campgrounds, managed and un-managed campgrounds and bush camping areas. These have a range of facilities to suit varying needs of visitors, provide ease of access to major attractions and do not require a permit. Bush camping areas have no toilet facilities and rely on campers being considerate of others. Visitors are encouraged not to disturb the trees in the area, to use gas appliances rather than fires for cooking and to take rubbish with them.
Section 6.1 Destination and visitor experience development	It can be seen from the effects to free camping areas that park management policy is devoid of any inspiration. Refer 10.2 Recent history on park activities will show that visitors used to camp all over the park with no detrimental impacts. Campsites were left clean and tidy, firewood was abundant and weed control/ cane toad reduction was implemented. The advent of the permit system further enhanced the amenity of these "non designated" campsites by reducing the frequency of human impact.	No change to the plan. The current practice of managing camping within the park is a result of the recognition of the significance of the World Heritage values of the park and reflect best practice. There are a limited number of environmentally sensitive areas where public access is restricted by camping permits. The permit system has allowed continued public access to these areas whilst minimising the impact on the environment and contributes to the visitor experience.

Plan reference	Comments in the submissions	Response
Humpty Doo Resident 2		
Section 6.1 Destination and visitor experience development	More of the historical campsites in the park could and should be opened up for public use. This of course should happen with regard to Section 6 and the use of permits. In this way numbers could be controlled, fees charged if deemed appropriate and spot checks conducted to ensure permit holders are complying to conditions.	No change to the plan. The potential for new campsites to be opened up is considered through the Visitor Experience / Precinct Planning process (Action 6.1.7) and discussions are currently underway with traditional owners about possible areas to allow exclusive camping (for a fee) for those who want a more remote/personal experience.
Section 6.1 Destination and visitor experience development	6.1.17 This statement is very contentious, as the general feeling is that the Old Jim Jim Rd and the track into Alligator billabong are closed for an extraordinarily long time at the beginning of the dry, until dust becomes the major hazard. It is stated by Park Management that this is to avoid damage to the track and the necessity for maintenance. What maintenance? The track off the Jim Jim Rd is an unmaintained track, just as the public expects and early entry by the public is not the cause of the majority of the damage. The wet season and the feral horses and buffaloes can lay claim to that. There is no compelling reason to delay the opening of this track so far into the dry season.	No change to the plan. Covered by Action 6.1.17 to ensure that public areas are open for as long as possible, particularly early in each year. Many visitor areas in the park are closed during the wet season due to flooding and can only be re-opened after tracks have dried up and are cleared of vegetation. Crocodile surveys may also be required prior to opening of some areas.
Section 9.01 Safety and incident management	5.2.7 "Manage native plants and animals..." On p66 it is stated that there are 20 years of survey data available on saltwater crocodiles. I can confidently state that I have over 40 years of personal observation of saltwater crocodiles in the park and that the tables have turned. We are now the hunted. It is inevitable that more crocodile attacks will occur given the current situation where no action is taken until after the event. Closing areas off to the public is a makeshift response. As unpalatable as it may sound to some, some form of limited culling may be the best solution. The increase in the saltwater crocodile population would probably explain the decrease in turtle numbers to some extent.	No change to the plan. Crocodiles are managed in accordance with the park's crocodile management strategy to minimise the risks of crocodiles to people while ensuring protection of the natural abundance of crocodile populations (Policy 9.1.4). The crocodile strategy is currently being updated and will review all the issues associated with crocodile management.
Section 9.01 Safety and incident management	9.1.4 (f) "closing water bodies temporarily, seasonally or permanently if crocodiles present a serious threat to human life." What a ridiculous statement to make! Crocodiles present a serious threat to human life in almost every water body in the park. When Park Management states it will close these water bodies, can it be assumed that will be for all humans?	No change to the plan. Crocodiles are managed in accordance with the park's crocodile management strategy to minimise the risks of crocodiles to people while ensuring protection of the natural abundance of crocodile populations (Policy 9.1.4). The crocodile strategy is currently being updated and will review all the issues associated with crocodile management.

Plan reference	Comments in the submissions	Response
Humpty Doo Resident 2		
Section 9.01 Safety and incident management	9.1.11 "implement the park crocodile management strategy" Did this strategy include input from members of the public, particularly local users as they do encounter crocodiles more frequently than interstate/overseas visitors?	No change to the plan. The crocodile strategy is currently being reviewed and updated. Once the draft strategy is available it will be made available to key stakeholders for comment.
Section 9.03 Authorising and managing activities	However, it is my experience that the permit system is applied to locals in an irregular way. One can never be sure if you will get a permit or not and when telephone enquiries are made you sometimes get the feeling that your permit application has been pre-determined by the person answering, to be denied.	No change to the plan. The existing permit system operates as an administrative process under current legislation. Decision making is based on these requirements reflecting APS Values and based upon the principles of procedural fairness and natural justice. The relevant legislation and information regarding application and assessment are available on the Parks website and in answering enquires park staff provide information on what is required for a permit application and make an effort to try to allow applicants to meet the requirements.
Section 9.03 Authorising and managing activities	The permit system needs to be addressed, with a view to making it less confrontational and more open (informative).	No change to the plan. The permit system will remain an ongoing requirement under the current legislation to allow a range of activities to be conducted within the Park. It exists as a mechanism to allow individuals, organisations and businesses to utilise the resources of the Park without undermining the values of the reserve. Under Action 9.3.4 the park is committed to reviewing and, where possible, improving systems for the processing, administration and management of permits.
Section 9.04 Capital works and infrastructure	9.4.10 "maintain roads and tracks" The park management's assertion that it will maintain roads and tracks should be altered to read "as determined by park management." It should also be stressed that "unmaintained 4wd tracks are exactly that" The major contributing factor to the ongoing deterioration of these unmaintained 4wd tracks is the wet season inundation and the consequent use of the tracks by feral buffalo and horses as can be attested to by the myriad hoof imprints.	No change to the plan. Roads and tracks in the park that are not the responsibility of the Northern Territory Government or Aboriginal organisations are maintained by the park to a standard that provides for safe use by residents and visitors and for management purposes (Action 9.4.10). This also reflects the standards for the designated road type as per guidelines provided by the NT Department of Infrastructure.
Section 10.4 Access	There are areas in the park where the Director could issue permits eg parts of the park that have not yet been declared Aboriginal Land which are subject to ownership dispute.	No change to the plan necessary. The matter is covered in Section 4.1 which states that Kakadu National Park is managed on the principle of managing the whole park as if it is Aboriginal land.

Plan reference	Comments in the submissions	Response
Humpty Doo Resident 2		
General comment	Section 2.1 p19 "In addition to seeking comments from members of the public....". It may be fairly stated that members of the public receive limited notification and then are expected to make their submissions during a very busy school exams/ end of year/ Christmas/ Holiday period. I saw just one notification in the NT News. A longer time frame for advertising the Invitation to Comment would be desirable.	No change to the management plan. The Board considered the timing of the public consultation and length of comment period and agreed to proceed despite the time of the year. The Board also agreed to an extension of the public comment period by two weeks resulting in a comment period of more than 10 weeks instead of the statutory 30 days. Two notifications were placed in the NT News and The Australian newspapers and key stakeholders were notified of the public comment period by letter or email and notices were circulated through user group networks.
Robert F McMahon & Associates - (Energy Management Consultants)		
Section 9.06 Resource use in park operations	The invitation for comments on the draft management plan has prompted me to propose that a fresh holistic energy review be carried out and an on-going energy management plan be developed under the Kakadu Management Plan. The development a practical energy management plan to reduce the Park's operating costs, carbon footprint and improve its environmental sustainability footprint.	No change to the plan. Action 9.6.3 enables development of a new environmental management plan for the park
Professor, Institute for Culture & Society, University of Western Sydney		
Section 4.1 Making decisions and working together (Board of Management)	In relation to Joint Management the Traditional Owners had expressed concern about decisions made with insufficient time to analyse, fully comprehend documentation and to discuss with wider community prior to Board meetings. It is imperative to support wider Traditional Owner participation with increased assistance to facilitate discussion prior to meetings, so the burden is not only on Board members; so all in the community are better informed and involved, and to encourage others to consider Board membership.	No change to the plan. Section 4 of the plan addresses these concerns. Parks Australia is working with land councils, indigenous organisations and representative groups and the Board of Management to determine how to improve engagement and benefits to the Indigenous community.

Plan reference	Comments in the submissions	Response
Professor, Institute for Culture & Society, University of Western Sydney		
Section 6.1 Destination and visitor experience development	The cessation of visitor fees and use of the entry stations complicated an otherwise very simple process for data collection (together with lost opportunity for the distribution of essential safety and other park information – such as being Aboriginal Land, its natural and cultural significance, codes of acceptable behaviour, the location of different visitor resources, services, information and so on; together with the major drop in revenue). I have not revisited the Park since the reintroduction of fees, so am unable to make comment on the arrangements but it appears from the Visitor Guide that the entry stations are now for information only and so not places where accurate vehicle and head counts can be undertaken. Park Passes purchased in a variety of places offer an indication but I assume a degree of non-compliance with Park fee payment especially by those spending only a day or two in the Park. I understand the history surrounding the issue of accurate data collection but never the less see it as one to be addressed/considered. I am pleased to see the attention to this in the draft plan.	No change to the plan. Supportive comment. Covered by Action 6.1.19 continue to monitor numbers and trends in visitation including feedback from visitors and the tourism industry.
Section 6.1 Destination and visitor experience development	I note the draft reports a decline in visitor numbers and a commitment to develop strategies to increase visitation. During the review process I found it very difficult to determine visitation trends from either the Board of Management or the KTCC minutes. It would seem to me to be a central issue needing regular and reasonably accurate reporting given so many decisions on human and financial resource allocation are contingent on visitor numbers. Day to day management might be more independent of accurate data but good strategic planning requires good base data.	No change to the plan. Covered by Action 6.1.19 continue to monitor numbers and trends in visitation including feedback from visitors and the tourism industry.

Plan reference	Comments in the submissions	Response
Professor, Institute for Culture & Society, University of Western Sydney		
Section 6.1 Destination and visitor experience development	<p>It is encouraging to note that a bushwalking strategy will be developed and implemented. This no doubt will serve various aspects of visitor management as well as supporting the promotion and marketing of the park to an important high yield and growing sector of the tourism market, attracting visitors with values and interests consistent with those of the Traditional Owners, Board of Management and Park staff.</p> <p>The bushwalking strategy should be integrated with the desire by Traditional Owners to have greater opportunity and benefits accruing from tourism. Explicit capacity building for the Traditional Owners should be identified in relation to tourism product development, operations and marketing.</p>	<p>No change to the plan necessary. Supportive comment.</p> <p>Covered in the plan by Section 6.2 (and Actions 6.2.3 and 6.2.4) that provide opportunities and potential benefits for Bininj including capacity building.</p>
Section 6.2 Commercial tourism development and management	<p>Environmental and waste management together with socially and environmentally responsible use of resources such as power, water and solid waste reduction by lease holders and CTOs has been identified for inclusion in lease agreements.</p> <p>This can be integrated with the suggested review of camping management issues together with the review of benefits of all accommodation lease agreements, as well mentoring and capacity building for Traditional Owners in the permit and tendering processes.</p> <p>Increasing and improving incident reporting to the Board and the KTCC will hopefully encourage greater responsibility and compliance by CTOs.</p>	<p>No change to the plan.</p> <p>Covered by Action 9.6.6 to encourage commercial tourism operators and accommodation providers to use recycled and renewable resources.</p> <p>Policies 6.2.4 and 6.2.5 re Commercial tourism leasing and activity licence arrangements will support Bininj/Mungguy enterprises and facilitate benefits to Bininj/Mungguy. Lease agreements with accommodation providers and the CTO permit and tendering processes require mentoring and capacity building for Traditional Owners. The outcomes of these are continually reviewed.</p> <p>Reporting of incidents to Board and Kakadu Tourism Consultative Committee already occurs and will be improved wherever possible.</p>
Section 9.10 Implementing and evaluating the plan	<p>This Reviewer also sought the consolidation of decision support tools - monitoring, surveys etc into a user friendly format, together with more detail on what strategies are or are not successful and why. This would assist both managers and the Board.</p>	<p>No change to the plan. Parks Australia have developed a management effectiveness framework which will be used to monitor and report on Commonwealth reserves (Section 9.10)</p>
Section 9.10 Implementing and evaluating the plan	<p>As a reviewer I found performance reporting that sought to aggregate responses for satisfaction or otherwise, from Traditional Owners, Park managers and others such as commercial tour operators (CTOs) results in very generic and mostly meaningless feedback. Traditional Owners have vastly different perspectives on most matters to other stakeholders, and their views deserve to be fully considered separate from other interested parties.</p>	<p>No change to the plan. In response to the recommendations of the Technical Audit of the fifth plan considerable work has been invested in developing explicit and measureable performance indicators for the sixth plan. Parks Australia have also developed a management effectiveness framework which will be used to monitor and report on Commonwealth reserves (Section 9.10). The review of the joint management arrangements in the park (Action 4.1.5) will fully consider and incorporate the views of traditional owners.</p>

Plan reference	Comments in the submissions	Response
Professor, Institute for Culture & Society, University of Western Sydney		
General comment	I found all the summary documents and fact sheets very useful and imagine they could serve various stakeholders right throughout the life of the Plan – with small adjustments only needed to move from utility in the drafting process. If this occurs I suggest some attention to the following, because the Summary documents will be read more than the full Plan of Management by community, industry and even other agencies. The points made refer to the needs of Plan as well as revisions to include in the Summary sheets:	No change to the plan. Supportive comment re factsheets supporting the release of the draft plan for public comment.
General comment	In the Summery Sheet : Measuring Results – the outer circle labelled ‘Results’ more accurately should read ‘ Monitor’ – given results also arise from ‘Implementation’ and ‘Review’.	No change to the plan. The MEF is a Parks Australia wide initiative and the suggestion has been forwarded to MEF staff to be considered when the MEF is reviewed but in the meantime we suggest the park remains consistent with the Parks Australia wide MEF.
General comment	Section 6: In relation to tourism and visitor management I support and encourage the need for clearer performance indicators and routine reporting, in particular, data on visitation, activities, experiences (rather than satisfaction) and incidents.	No change to the plan. Supportive comment. In response to the recommendations of the Technical Audit of the fifth plan considerable work has been invested in developing explicit and measureable performance indicators for the sixth plan. Data on visitor numbers and the results of visitor surveys provide useful information for management. Visitor surveys are being designed to consider a range of issues, including satisfaction with the range and type of activities and experiences available.
General comment	Likewise, the stronger values based approach is welcome. Given the very nature of the cultural context of Kakadu and the World Heritage criteria by which it is inscribed perhaps the ‘cultural landscapes’ approach could be employed more as a conceptual framework to assist the integration of natural and cultural values which are separated – see for example the diagram pg 2. of the Fact Sheet: Summary of the draft Plan. This is a non Indigenous construct that shapes much of how the park management operations are implemented. A cultural landscapes approach would also place greater emphasis on the fact that whilst an ancient culture it is also a living culture and community. This is clearly important to the Traditional Owners and many references in the review suggested concerns that relate to the way the place and the approach to its management is conceived. It is important to how Park staff approach the joint management process. It is also important to how visitors understand the Park, its values and what is appropriate behaviour.	No change to the plan. A values based approach is now widely used in management planning and early in the development of the new plan the Kakadu Board agreed to use this approach.

Plan reference	Comments in the submissions	Response
Professor, Institute for Culture & Society, University of Western Sydney		
General comment	The reviewer of Section 5. Caring for Country was equally concerned as I was about the lack of definition of what was regarded as 'Acceptable' in relation to a wide number of performance measures, and how to reasonably assess participation of Traditional Owners in a meaningful way. Vexed but important questions that hopefully the new Plan can address to assist the Board in its deliberations.	No change to the plan. In response to the recommendations of the Technical Audit of the fifth plan considerable work has been invested in developing explicit and measureable performance indicators for the sixth plan which avoid the use of subjective measures like "acceptable". A performance monitoring plan will be developed in accordance with Action 9.10.9 and will establish the measures and targets for performance indicators in the plan.
General comment	In the Tourism fact sheet, the diagram pg. 3 explaining the content of: Section 6: should include mention of capacity building for Traditional Owners under commercial tourism development, given the clearly expressed desire for increased participation; Other government agencies should be mentioned as well as industry under promotion and marketing, given the disappointment of the Board of Management in the role Tourism NT has played during the life of the previous Plan. Section 9: should perhaps also mention communicating safety issues to visitors, not just providing a safe environment. Section 10: should include development of a visitor Code of Conduct given feedback from the Traditional Owners of concerns and issues.	No change to the plan. The suggested edits relate to the factsheets supporting the draft plan and are acknowledged. They will considered when the factsheets are revised upon finalisation of the plan.
Karama (Darwin) Resident		
Section 5.1 Looking after culture	The traditional use of using set handlines in the waterways. We have on many occasions retrieved handlines that had been forgotten. This could also pose a threat to the native turtles.	No change to the plan. Traditional owners are able to use set lines in the name of traditional hunting-food gathering (s.359A). For everyone else, using a set line is an offence under Regulation 12.36(5). The methods of acceptable fishing are prescribed by the Regulations and communicated to visitors through park brochures and the website. Persons using unattended set lines may be prosecuted and compliance activities include efforts to detect such lines wherever possible. Section 9.2 covers compliance and enforcement activities in the park. The Director cannot regulate traditional hunting or impose any restrictions on it but can encourage and promote sustainable practices as covered in Action 5.1.10.

Plan reference	Comments in the submissions	Response
Karama (Darwin) Resident		
Section 6.1 Destination and visitor experience development	<p>We are all stakeholders in the Park & would like to be able to access it whenever we like(within reason) not come away with a negative experience of being shut out.</p> <p>Long term residents have a great affinity with the Park, a lot of us accessing different areas prior to it becoming Kakadu National Park.</p>	<p>No change to the plan.</p> <p>The current practice of managing access to the park is a result of recognition of the significance of the World Heritage values of the park and reflect best practice.</p> <p>Covered by Section 9.3 through the use of a permit system that allows continued public access to sensitive areas whilst minimising the impact on the environment and contributing to the experience of those who access the area. The potential for opening up new areas is considered through the Visitor Experience Planning process (Precinct Planning Action 6.1.7).</p>
Section 9.01 Safety and incident management	<p>Closing of water bodies if crocodiles become a threat to human life. A better management plan must be found. Closure will not make the threat go away I would have thought it would increase the problem as they would be left to breed & numbers would be even more uncontrollable.</p>	<p>No change to the plan.</p> <p>Crocodiles are managed in accordance with the park's crocodile management strategy to minimise the risks of crocodiles to people while ensuring protection of the natural abundance of crocodile populations (Policy 9.1.4). The crocodile strategy is currently being updated and will review all the issues associated with crocodile management.</p>
Section 9.01 Safety and incident management	<p>Transparency from Parks to the public as to what their management strategy is in regards to crocodile management.</p>	<p>No change to the plan.</p> <p>Crocodiles are managed in accordance with the park's crocodile management strategy to minimise the risks of crocodiles to people while ensuring protection of the natural abundance of crocodile populations (Policy 9.1.4). The crocodile strategy is currently being updated and will review all the issues associated with crocodile management.</p>
Section 9.01 Safety and incident management	<p>Restricting the size of boats using the waterways is not the answer, fish will always need to be retrieved no matter how croc aware you are.</p>	<p>No change to the plan.</p> <p>Crocodiles are managed in accordance with the park's crocodile management strategy to minimise the risks of crocodiles to people while ensuring protection of the natural abundance of crocodile populations (Policy 9.1.4). The crocodile strategy is currently being updated and will review all the issues associated with crocodile management.</p>
Section 9.01 Safety and incident management	<p>Parks have programmes for 'feral' species why not the 'native' salt water crocodile..</p>	<p>No change to the plan. Crocodiles are managed in accordance with the park's crocodile management strategy to minimise the risks of crocodiles to people while ensuring protection of the natural abundance of crocodile populations (Policy 9.1.4). The crocodile strategy is currently being updated and will review all the issues associated with crocodile management.</p>

Plan reference	Comments in the submissions	Response
Karama (Darwin) Resident		
Section 9.01 Safety and incident management	<p>We have been accessing the park for the past 30 odd years & have found a significant increase of the salt water crocodile, I understand that there could be 5 to 6 large saltwater crocodiles for every kilometre of major waterways within the park. They are becoming more aggressive toward visitors & residents within the park. How can that be sustainable?</p> <p>Public awareness, crocwise coverage, research is but a part of the solution. No matter how croc wise a person is the animal is by nature the aggressor. We are unable to defend ourselves within park guidelines.</p> <p>The safety of the public must be taken into consideration. Closing down area's where an incident has occurred is not a solution it is a short term measure.</p>	No change to the plan. Crocodiles are managed in accordance with the park's crocodile management strategy to minimise the risks of crocodiles to people while ensuring protection of the natural abundance of crocodile populations (Policy 9.1.4). The crocodile strategy is currently being updated and will review all the issues associated with crocodile management.
Section 10.4 Access	<p>As a long term user of the park 30 years plus, historical camp sites have been closed & a permit required to access an area. When trying to arrange a permit it seems that a decision had already been made that it will not be granted. No valid reason is given as to why it has not been granted. Putting up a sign stating No Access would seem to some that Parks are trying to 'lock' out the long term users of the Park.</p> <p>Camping, not necessarily in a designated area, & fishing are an integral part of using the park.</p>	<p>No change to the plan necessary.</p> <p>The matter is covered by Section 6.1 where the potential for opening up new areas is considered through the Visitor Experience Planning process (Precinct Planning). Discussions are currently underway with traditional owners about potential areas to allow greater access.</p>
Section 10.4 Access	<p>Closure of certain areas of the park that were used by long term residents is unpalatable to a lot of us. Areas that were freely accessible are now restricted, the permit system that is now used seems to be nonexistent when you apply.</p>	<p>No change to the plan necessary.</p> <p>The matter is covered by Section 9.3 where the permit system allows continued public access to sensitive areas whilst minimising the impact on the environment and contributing to the experience of those who access the area.</p>
Section 10.4 Access	<p>Interstate visitors who have travelled to the Territory for the outback experience feel 'duped' when they arrive to find a majority of the areas within the park unaccusable.</p>	<p>No change to the plan necessary.</p> <p>The matter is covered by Section 6.1 which includes actions to ensure a diverse range of experiences are available to visitors (6.1.5), management of access to visitor sites using permits (6.1.14) and use of best endeavours to ensure that public places are open for as long as possible (6.1.17).</p>
Section 10.4 Access	<p>Closure of the Old Jim road & access to the billabongs for much of the early dry season is a contentious issue for long term residents. There is no valid reason for the long closure to these areas the majority of damage done is not done by visitors but by feral animals when the area is still damp.</p>	<p>No change to the plan necessary.</p> <p>The matter is covered by Section 6.1 that includes prescriptions e.g. 6.1.17, 6.1.18 that will try to ensure that public areas are open for as long as possible, particularly early in each year and consideration of implementing staged opening of sites during the shoulder seasons.</p>

Plan reference	Comments in the submissions	Response
Karama (Darwin) Resident		
General comment	I myself saw only one notification in the paper prior to Xmas. I was also given assurance from Park Management that I would be notified when this draft was up for comment. This did not happen.	No change to the plan. The invitation to comment on the draft management plan was issued in accordance with the EPBC Act. Notices were published in the Australian Newspaper and the NT News and the Gazette. Letters and emails were also sent to over 100 stakeholders to invite them to comment on the draft plan. Unfortunately Ms Scott was not on the register of stakeholders for the mail-out.
General comment	Comment from members of the public would be limited due to the timing of 'public comment' due to Xmas school Holidays etc. I feel a longer consultation time would be a much better outcome for all parties.	No change to the management plan. The Board considered the timing of the public consultation and length of comment period and agreed to proceed despite the time of the year. The Board also agreed to an extension of the public comment period by two weeks resulting in a comment period of more than 10 weeks instead of the statutory 30 days. Two notifications were placed in the NT News and The Australian newspapers and key stakeholders were notified of the public comment period by letter or email and notices were circulated through user group networks.
Commercial tour operator (bushwalking)		
Section 1.5 Joint management	3) Kakadu is regarded as a leader in joint management throughout Australia and around the world. From my perspective as someone outside the system who has talked to a number of people who are or were working in it, it appears that joint management is not working as well as it should and that almost no group of stakeholders is truly satisfied with the way things are working. I have many questions and no answers, only a hope that it can be made to work better so that many of the problems it faces today can be overcome.	No change to the plan. Section 4 of the plan clearly addresses these concerns. Parks Australia is working with land councils, indigenous organisations and representative groups and the Board of Management to determine how to improve engagement and benefits to the Indigenous community.
Section 2.1 Management plan process	I have no issues with anything in this section. I would particularly like to commend the inclusion in 2.1 of improved 'monitoring and reporting to provide evidence-based measures of progress'. Our society is full of examples where people believe that they should do something for which no evidence exists or, in some cases, where there is scientific evidence that the action is actually counterproductive.	No change to the plan. Supportive comment.

Plan reference	Comments in the submissions	Response
Commercial tour operator (bushwalking)		
Section 2.2 Management plan framework	This section notes that the Board needs adequate resources to carry out its functions under the EPBC act. Given the financial stress that the park is under, can this realistically be done? Should the plan try and set priorities when the resources do not allow everything that should be done under the act?	No change to the plan. Section 2.2 includes the prioritisation methodology used in the plan. This includes identification of the significance of threats affecting park values. Priority sites and species are also being identified outside the management plan to inform management actions. Section 7.1.11 includes an action to map priority areas for natural and cultural values in each of the four major landscapes to inform management priorities for managing weeds, fire and other threats.
Section 3. General provisions and IUCN category	In the public mind, the words 'national park' imply a degree of access that can never be appropriate on Aboriginal Land. If the general public became aware that something like 95% of the park was out of bounds, the 'Kakadon't' message would go out stronger than ever. This is the last thing that the park needs.	No change to the plan. The Board resolved that the park should continue to be assigned to the IUCN category II. The Board considers that IUCN Category II National Park is not inconsistent with the management of activities in the park.
Section 4.1 Making decisions and working together (Board of Management)	4.1.4. is particularly good. The advance notice mentioned was provided for in the last Plan. It has made things much easier for tour operators compared with earlier times.	No change to the plan. Supportive comment.
Section 4.2 Making decisions and working together (on country)	"Consultation and decision-making processes and protocols need to be clear and consistently followed. Records of consultations and decisions need to be properly kept." That's a good statement, but it almost seems to imply that this hasn't been done properly in the past. If that's the case, it's a damning statement about past practices.	No change to the plan. Business systems in the park are continually being improved
Section 4.2 Making decisions and working together (on country)	I believe that decision making, especially when it comes to the use of public funds, needs to be as transparent as possible. The Board of Management newsletter is a good step in this direction. The more open communication both to the traditional owners and the wider community, the better.	No change to the plan. Supportive comment.

Plan reference	Comments in the submissions	Response
Commercial tour operator (bushwalking)		
Section 4.3 Bininj/Mungguy training and other opportunities	For many years I have offered to employ a Bininj/Mungguy assistant/trainee guide on a few trips. Those trips proved hard to sell. when they did, finding a Bininj/Mungguy guide proved difficult at best, impossible at worst. In one case, I was told that someone was available but that person was asking for a wage substantially higher than I paid my full guides at the time. That wasn't realistic as running the trip would then have lost me a substantial amount of money. There ought to be some central location where tour operators could offer employment to Bininj/Mungguy. They could specify what was expected of a potential employee and what the employee could receive in return.	No change to the plan. Policy 4.3.2 provides for the development of such a system to promote and facilitate Bininj/Mungguy tourism and other enterprise opportunities.
Section 5.1 Looking after culture	There are a number of art sites which are on approved bushwalking routes. If a member of park staff and/or one of the traditional owners for an area were to accept our offer and come along on one of our trips, he or she could assess the condition of the paintings in those sites. I can't think of a cheaper way for this to be done.	No change to the plan. The offer is acknowledged and Park staff have previously participated in commercial bushwalks. Rock art work is strenuous and time consuming and would conflict with intent of commercial bushwalks. Covered by Actions 5.1.1 and 5.1.2/3/4 that provide for a rock art conservation programme including assessment and monitoring.
Section 5.1 Looking after culture	I have found it difficult to find the Bininj/Mungguy names for some of the places we visit. Is it possible that some of these have been lost. When Aboriginal names are used, phonetic pronunciations would help e.g. Ngurrungurrudjba. it would be even better if the park website could have things you can click on to hear how those names are pronounced.	No change to the plan. Covered by Actions 5.1.7 and 6.4.10 signage project and Aboriginal place names project. Pronunciation of place names could also be incorporated into the Bininj Gunwok language resources website.
Section 5.1 Looking after culture	I have been doing extended bushwalks in the stone country since 1974. There would be few, if any, people now alive who have spent more time there. I have seen many changes over the years, generally for the worse. In section 5.1, it was noted that, "During the recent past, many Bininj/Mungguy who had important knowledge about country and culture have passed away. Bininj/Mungguy have expressed concern that much of this knowledge is being lost." It saddens me to think that my own knowledge may be lost in a similar way. For more than 20 years, I have offered to take people onto country. The time when I will no longer personally be able to do that is approaching all too fast.	No change to the plan. Covered by Actions 5.1.6/7/8 whereby the park will provide support to Bininj/Mungguy to get on country and preserve culture through cultural activities, recording oral histories and incorporation of knowledge and skills into natural and cultural programs.

Plan reference	Comments in the submissions	Response
Commercial tour operator (bushwalking)		
Section 5.2 Looking after country	While I agree that the programme has reduced the extent and intensity of the fires, I believe that it is no where near enough. With each passing year the damage gets worse. To me, the second sentence in the quote reads as an admission of defeat. If park management (I must emphasise that I am referring not only to on ground staff in Kakadu but to the Parks Australia head office in Canberra) were willing to think outside the box, there is a lot that could be done.	No change to the plan. Covered by Sections 5.2 and 5.3 which acknowledge the challenges of managing fire in the park and the steps that will be taken to address them, including Action 5.3.27 Structure fire management programs to engage resident Bininj/Munggy and attract their active support for preventing and reporting unplanned ignition.
Section 5.2 Looking after country	Even April was probably too late. I have seen patches which had burned in the wet season, either caused by lightning strikes or by an experimental program at the time. The burnt patches were smaller still. The speargrass in those patches took two or three years to come back. Little fuel meant that fire sensitive species like Callitris had a chance, even if it was only for a brief period. The fire regime may have improved since 2006, but species like Callitris remain in decline. Continuing with the status quo will almost certainly allow the decline to continue.	No change to the plan. Covered by Sections 5.2 and 5.3 which acknowledge the challenges of managing fire in the park and the steps that will be taken to address them, including Action 5.3.27 Structure fire management programs to engage resident Bininj/Munggy and attract their active support for preventing and reporting unplanned ignition.
Section 5.2 Looking after country	My understanding is that clans like the Badmardi (from the Deaf Adder and Jim Jim Falls area) spent the dry seasons on the lowlands and floodplains (documented by Leichhardt in November 1845) and returned to the sandstone in the Wet to take advantage of all the shelter there. In addition, the floodplains were hard to use at this time of year. This hypothesis puts the highest concentration of people in the stone country during the wet season. I assume that they would have burnt there opportunistically. And if there were a substantial number of people from Gunlom to Oenpelli, living and burning for three or four months each year they would have had to have a major effect on the environment. That pattern of burning no longer exists.	No change to the plan. Comment noted.
Section 5.3 Managing park-wide threats affecting values	We seldom see signs of dingoes in the stone country. Has any research been done on the dingo population. I once came across a pack of dingoes that had brought down a wild pig. If there were more dingoes, perhaps there would be fewer pigs.	No change to the plan. Commentary only. Much of Kakadu's dingo population has been interbred with wild dogs and can be a problem placing increased pressure on native animals and causing safety issues around living areas. It would be difficult and resource intensive to undertake measures to increase the population of pure dingoes in the park and is not a practical solution for the control of wild pigs.

Plan reference	Comments in the submissions	Response
Commercial tour operator (bushwalking)		
Section 5.3 Managing park-wide threats affecting values	Is there anyone now alive who knows what the traditional burning practices were in the stone country? If so, has the vegetation already changed so much that those practices might no longer be viable? I have said a lot more about fire elsewhere in this submission so I'll just repeat the idea that park management should look for all the help it can get. The park does not have the money and is unlikely ever to have the money to run a burning program that will prevent the continued degradation of the landscape that I have witnessed over the past 40 years.	No change to the plan. Fire management is covered in Section 5.3 where it is acknowledged that the park works with scientific experts from Bushfires NT and Charles Darwin University to improve fire management. The Director of National Parks also commissioned ARRIDENT Pty Ltd to undertake a review of fire management across the reserves under the responsibility of the Director and a number of recommendations from this report are currently being implemented.
Section 5.3 Managing park-wide threats affecting values	The draft plan recognises that, "Management actions for some threats may not be feasible or cost-effective." Surely this should suggest that looking at all possible outside alternatives to assist with management be considered. While specific proposals do not belong in a Plan of Management, a statement of some sort saying that outside proposals to assist with managing some of the threats to the park will be considered. Here are a few of the kinds of things which I believe need to be considered if Kakadu is to have any hope of managing the threats it faces.	No change to the plan. This matter is covered in Section 5.3 (Managing park-wide threats affecting values) and Section 9.7 (Neighbours, stakeholders and partnerships) which prescribes that a regional approach will be taken to manage threats impacting on park values by liaising and collaborating with neighbours, government agencies, local organisations and other stakeholders. Prescriptions in Section 9.8 will also explore opportunities to increase revenue and business development.
Section 5.3 Managing park-wide threats affecting values	Mimosa is a wonderful example of success; salvinia an example of failure. If gamba grass is allowed to become established, it will destroy the ecological balance of the park.	No change to the plan. Covered by Action 5.2.11 which clearly identifies the control of gamba grass as a priority in the lowlands.
Section 5.3 Managing park-wide threats affecting values	Biologists tell us that to effectively reduce pig numbers to acceptable levels you must first kill about 85% of the population and then you must keep the pressure on them. I cannot see how the park budget will ever allow for that. Aerial shooting once or twice a year is probably a waste of money. The only possible answer I can see having any chance to make a difference is to allow recreational hunters to pay for the privilege of shooting them from a park supervised helicopter or on the ground with Binninj/Mungguy guides.	No change to the plan. Allowing recreational shooters to assist with feral animal control in the park was considered by the Board which resolved: 1) not to alter the plan in response to the comments due to safety, environmental and cultural concerns 2) If the position of the Board changes during the life of the plan, the plan is sufficiently enabling to issue permits to shooting associations, Indigenous enterprises, contractors and individuals to assist in culling operations.

Plan reference	Comments in the submissions	Response
Commercial tour operator (bushwalking)		
Section 5.3 Managing park-wide threats affecting values	Pigs are a disaster. 20 years ago, I saw relatively few signs of pig damage, now the signs are everywhere. Current feral animal control measures are not working. One possible solution would be to open parts of the park to private shooters, guided by park staff or some of the relevant traditional owners. (Having a guide in charge would be absolutely essential.) People would gladly pay for the privilege. Kakadu would get needed funds, and, if nothing else, it would buy time to allow some threatened species to recover.	No change to the plan. Allowing recreational shooters to assist with feral animal control in the park was considered by the Board which resolved: 1) not to alter the plan in response to the comments due to safety, environmental and cultural concerns 2) if the position of the Board changes during the life of the plan, the plan is sufficiently enabling to issue permits to shooting associations, Indigenous enterprises, contractors and individuals to assist in culling operations.
Section 5.3 Managing park-wide threats affecting values	I refer you to a blog produced by one of Australia's highest profile conservation biologists which contains an article called 'Biodiversity SNAFU in Australia's Jewel'. I don't know how many people visited that particular page but it claims that the blog itself has received over one million visits. It is a damning indictment of current and past practice. It puts a different perspective on the 'Kakadon't' message. See http://conservationbytes.com/2010/06/16/biodiversity-snafu/	No change to the plan. The need to do more is noted. The Park makes its best efforts within the available resources to control threats in the park, taking into account the best information and advice available.
Section 6.1 Destination and visitor experience development	The draft plan mentions a desire to promote bushwalking and the desire to promote new experiences. What it did not mention is how many bushwalking routes have disappeared over time. (I have documented many of these in past submissions to park management.) I believe that many of those routes could be re-opened or modified, then reopened if only we could find Bininj/Mungguy willing to come along on an semi-exploratory walk where they could say it is fine to follow a particular route but not to go somewhere else that might be only a couple of hundred metres away. I have made proposals like that in the past, but have yet to have them taken up. We could provide most or all of the necessary bushwalking gear as we have done on other trips outside the park.	No change to the plan. Tighter restrictions on health and safety legislation and concerns from traditional owners about culturally sensitive areas being accessed by visitors has resulted in the closure of some routes. Covered by Actions 6.1.7 and 6.1.10 where opportunities for more walking routes throughout the park will be considered in the walking strategy and through the precinct planning process.

Plan reference	Comments in the submissions	Response
Commercial tour operator (bushwalking)		
Section 6.1 Destination and visitor experience development	While the restrictions on overnight walkers have discouraged some, I believe that the increasing restrictions on people doing shorter guided walks has been even more detrimental to visitation. Once upon a time it seemed reasonable for a tour guide to take his or her clients a short distance off a marked trail. That is no longer the case. Once it was possible for day walkers to walk quite a distance along approved bushwalking routes and return the same day (as was the case above Twin Falls). That kind of restriction needs to be addressed or the 'Kakadon't' message will continue to exist.	No change to the plan. Tighter restrictions on health and safety legislation and concerns from traditional owners about culturally sensitive areas being accessed by visitors has resulted in the closure of some routes. Covered by Actions 6.1.7 and 6.1.10 where opportunities for more walking routes throughout the park will be considered in the walking strategy and through the precinct planning process.
Section 6.1 Destination and visitor experience development	Over the life of the plan new experiences will be considered consistent with this plan....' I certainly hope that this is the case. I have a couple that I'd like to try myself, including using helicopters as I was able to do for some years in the 1980s through 1990 or 1991.	No change to the plan. Supportive comment.
Section 6.1 Destination and visitor experience development	'Feel the country ...' More than anyone else, bushwalkers 'feel the country'. More could be done with this. I have seen some positive developments in recent years. I hope they keep coming.	No change to the plan necessary. Supportive comment.
Section 6.2 Commercial tourism development and management	Some years ago, some of the traditional owners in the southern part of the park came up with a plan whereby they would run tours where they took paying customers on traditional burning expeditions. I was told that this was rejected because of liability concerns. Anyone running a tour is required to have liability insurance. That insurance should cover all the activities involved in the tour. If a program like that were set up properly, there would be no liability to the park.	No change to the plan. Commercial activities undertaken in the park must include some form of liability insurance. Participation in burning activities requires appropriate training and safety equipment to ensure public safety. Visitors accompanying trained and/or qualified people undertaking burning activities is a high risk activity.
Section 6.2 Commercial tourism development and management	The single best thing that could happen to small tour operators has now happened – the link to tour operators' websites from the Kakadu website. With links going in both directions, visits to both the park website and individual operator websites will increase.	No change to the plan. Supportive comment.
Section 6.2 Commercial tourism development and management	6.2.11 and 6.2.12 are both important. I applaud their inclusion and hope that they can be made to work.	No change to the plan. Supportive comment.

Plan reference	Comments in the submissions	Response
Commercial tour operator (bushwalking)		
Section 6.2 Commercial tourism development and management	<p>6.2.6 ‘...the Director will, as far as practicable, inform the tourism industry with 12 to 18 months’ notice when changes are made to visitor management in the park that will significantly affect commercial tourism activities.’</p> <p>That happened during the life of the last plan. It was a true blessing when compared with what sometimes took place under earlier plans.</p>	No change to the plan. Supportive comment.
Section 6.3 Promotion and marketing	<p>“The increasing range and affordability of camera equipment and rapidly expanding use of social media makes it more challenging to ensure accurate and positive images of the park are taken and disseminated by visitors.”</p> <p>It is not ‘more challenging’, it is impossible. Proper promotion of the park should be able to ensure that the vast majority of what goes out is positive, but there will always be some negative and/or inaccurate information going out. The only way to prevent this is to keep the public out entirely, and that, of course, would be the biggest negative message possible. There is no perfect solution.</p>	No change to the plan. Commentary only.
Section 6.3 Promotion and marketing	The recently introduced links to and from park website are, in my opinion, one of the best things that has happened in years. It should be very helpful in both directions. The word ‘bushwalking’ needs to be supplemented by other words international visitors will use – trek and hike are two that come to mind.	No change to the plan. The plan is not the appropriate mechanism to make changes to the park website.
Section 6.3 Promotion and marketing	While Kakadu IS a cultural landscape, talking to past and potential visitors leads me to believe that they come first for the natural landscape with culture and wildlife coming almost as an afterthought. Once in the park, they do come to appreciate the cultural aspect of the landscape, but if aim is to increase visitation, then there needs to be more emphasis on the things that catch people’s attention in the first instance.	<p>No change to the plan.</p> <p>Covered by Action 6.3.3 where the park will develop a cooperative promotion and marketing strategy with the tourism industry and the Australian and Northern Territory governments</p>

Plan reference	Comments in the submissions	Response
Commercial tour operator (bushwalking)		
Section 6.3 Promotion and marketing	<p>6.3.1.e. “Bininj/Mungguy and the Director care about visitor safety and would like all visitors and tour guides to take good care of their own and other people’s safety while they are in Kakadu: your safety is our concern and your responsibility.”</p> <p>While you can say this, people don’t FEEL the message. Accidents happen. When Jeffrey Lee, spoke to the KTCC after someone had died in an accident at Jim Jim, we could all feel his distress. If there were some way of getting that depth of feeling across, the message might actually get through to people. As it is, it is just words on paper.</p>	<p>No change to the management plan.</p> <p>Personal safety information is included on park signage and interpretive materials in accordance Sections 6.4 Visitor Information and 9.1 Safety and incident management.</p>
Section 6.4 Visitor information	The program to update the signage in the park should go a long way to addressing some of the existing problems.	No change to the management plan. General supportive comment.
Section 7.1 Research and knowledge management	Putting some of that research onto the official Kakadu website should be a simple task. The more information that is on the website, the more people will find it.	No change to the plan. Information about some major research projects undertaken in Kakadu National Park is publicly available through other websites, such as the National Environmental Research Program (NERP).
Section 8.1 Outstations and living on country	I would, however, hope that new outstations would not be situated in areas where they would have more than a minor impact on existing uses.	No change to the plan. Proposals for establishing new outstations will be assessed in accordance with Section 9.5 (Assessment of proposals) which provides for protection of the natural and cultural values, and managed according to the Outstations Guide to Development (2014) (Policy 8.1.3).
Section 8.2 Jabiru	Everything here seems reasonable to me but I would like to stress that a decrease in the facilities available in the town, some of which depend on the town having a reasonable population, will have seriously detrimental effect on visitation and therefore to park revenue.	No change to plan. The comment raises a valid concern about impact of the closure of Ranger Uranium Mine and the associated changes to the township, which will affect Kakadu National Park. This issue will be considered as part of the new town plan and is covered in Section 8.2.
Section 9.01 Safety and incident management	“Bininj/Mungguy feel a sense of responsibility for all people visiting their country, and feel distressed if a visitor is injured or dies.” You can say this but until someone sees first hand how it affects the traditional owners, they won’t understand. Maybe something could go onto the Kakadu website. I remember how much better I understood this after Jeffrey Lee spoke to the KTCC after a tourist had died.	No change to the plan. This matter is covered by Section 9.1 Safety and incident management and specifically Actions 9.1.10 and 9.1.11 about communicating the importance of staying safe in the park.

Plan reference	Comments in the submissions	Response
Commercial tour operator (bushwalking)		
Section 9.01 Safety and incident management	Over the past 40 years, I have watched with dismay as Australia has moved more and more toward a society where personal responsibility for one's own actions is no longer accepted. Kakadu management has been very helpful in allowing some walks that might be considered 'risky'. I hope that this will continue. If restrictions become too great, international visitors will go elsewhere as will many Australians.	No change to the plan. The processes for authorising and managing activities are covered in Section 9.3 and reflect the level of risk associated with activities in the park.
Section 9.01 Safety and incident management	Kakadu has already seen a marked decline in younger visitors. Making things 'too safe' could result in the park becoming more of a destination for less adventurous elderly people and less for both the young and more adventurous older people.	No change to the plan. Commentary only.
Section 9.03 Authorising and managing activities	While I am not a scientist, I have known a number of people who have done scientific research in Kakadu. They almost all complained about how difficult it was. As a general rule, I would think that any research which might benefit the park while costing it nothing should be approved as quickly as possible.	No change to the plan. The permit system will remain an ongoing requirement under the current legislation to allow a range of activities, including research, to be conducted within the Park. It exists as a mechanism to allow both individuals, organisations and businesses to utilise the resources of the Park without undermining the values of the reserve. Under Action 9.3.4 the park is committed to reviewing and, where possible, improving systems for the processing, administration and management of permits.
Section 9.08 Revenue and Business Development	This section (5.3 Managing park-wide threats affecting values) reads well. It was written with the best of intentions but the reality is that Kakadu does not have the money to do all that is necessary. I hope that I am wrong, but I'd almost be willing to stake my life on the fact that, in real dollar terms, Kakadu will be receiving less federal money in ten years time than it is now. The only way that this can be even partially overcome is to think outside the box and try and work out ways to get non-government sources to cover the cost of what is necessary.	No change to the plan. This matter is covered by Section 9.8 Revenue and business development. It is a significant area of development for Parks Australia, with reduced government allocations it is necessary to look elsewhere for funding to assist in the operation of the park. The plan describes many of the actions that are required to be undertaken to manage the park. Further actions are described in strategies, programmes, policies and operational plans. The park will prioritise actions that need to be delivered during the life of the plan and will adjust resources where necessary.
Section 9.08 Revenue and business development	Parks Australia and Kakadu are financially stressed. I cannot see this getting anything but worse in the coming years. I have been told of proposals, some of which were coming from Bininj, that were knocked back because they didn't fit the traditional mould. If that is true and that remains the case, the park will continue to deteriorate from lack of funds. Park management and those in Canberra need to be willing to think outside the box and consider almost anything which will improve revenue without damaging park values. If that doesn't happen, I can foresee the day when Kakadu gets a World Heritage Under Threat listing. That's the last thing it needs.	No change to the plan. This matter is covered by Section 9.8 Revenue and business development. It is a significant area of development for Parks Australia, with reduced government allocations it is necessary to look elsewhere for funding to assist in the operation of the park.

Plan reference	Comments in the submissions	Response
Commercial tour operator (bushwalking)		
Section 10.02 General rules for managing use of the park	I am particularly pleased with the emphasis on notifying tourism operators and other relevant stakeholders as fast as possible if an area needs to be closed.	No change to the plan necessary. Supportive comment.
Section 10.4 Access	Roads and tracks within the park will be maintained for as long as practicable into the wet season, and opened as soon as practicable after the wet season to provide residents and visitors access to the park. “ It's very good to have that statement in the plan.	No change to the plan necessary. Supportive comment.
Section 10.4 Access	"10.4.11 Permits may be issued for the landing, take-off and operation of aircraft in the park, following consultation with Bininj/Mungguy, for the following purposes: (d) commercial bushwalking tours or heli-touring ventures." It's great to have this actually stated. I hope I can see the day when I can actually again schedule a wet season trip which uses helicopters to drop people off and/or collect them.	No change to the plan necessary. Supportive comment.
Section 10.6 Traditional use of land and water	"10.6.4 Bininj/Mungguy may continue to use areas in the park for burials (including scattering of ashes) in accordance with their traditional rights. Other Aboriginal people or non-Aboriginal long-term residents of the park may be buried in the park with the approval of traditional owners." Considering the amount of time I have spent in the park, I can think of no better place for my own remains when the time comes.	Commentary only. No change to the plan necessary.

Plan reference	Comments in the submissions	Response
Commercial tour operator (bushwalking)		
Section 10.7 Recreational activities	<p>"10.7.4 Permits may be issued for overnight bushwalking activities using prescribed routes in the park, subject to a range of permit conditions that protect the health and safety of visitors and the natural and cultural values of the park."</p> <p>"10.7.5 Permits may be issued to light a fire in areas other than a fireplace provided by the Director when associated with other activities such as bushwalking."</p> <p>"10.7.6 Bicycles may only be ridden on a vehicle access road or vehicle access track or a track for riding provided by the Director, and subject to any prohibitions or restrictions by the Director under Section 10.2 (General rules for managing use of the park). "</p> <p>I am particularly pleased with these three items. Bicycles could become a more important part of park use with proper management and publicity. Both the Darwin Bushwalking Club and Willis's Walkabouts used to use bicycles to gain wet season access to some areas. Gunlom might make the ideal area for a trial.</p>	No change to the plan necessary. Supportive comment.
Section 10.7 Recreational activities	An on-line permit application system might assist, and an on-line map of approved routes with information on availability would be an enormous help. Given the wishes of the traditional owners, this is unlikely. If that remains the case, I do not see how an online booking system can be perfected.	<p>No change to the plan.</p> <p>The park does not provide a map of approved routes and campsites on-line because overnight bushwalking, and bushwalking in remote and off-track areas in Kakadu presents a much higher level of risk to visitor safety than marked walks. These walks can be physically demanding and require a high level of navigation skills. By not advertising the routes, people are required to do their own research and talk to local clubs to find out about the routes. Applicants need to demonstrate they meet the required level of preparedness and skill before a permit can be issued.</p> <p>The walking strategy (Action 6.1.10) will consider the issues around bushwalking permits and the development of more walking routes.</p>

Plan reference	Comments in the submissions	Response
Commercial tour operator (bushwalking)		
Section 10.7 Recreational activities	I have been told of private and club groups who are finding it increasingly difficult to book routes, even months in advance. Some locals believe that large interstate groups 'block book' various routes – with no penalty for cancellation or simply failing to appear. That is what happens with the Jatbula Trail in Nitmiluk. Surely Kakadu can learn from that mistake. A permit fee might discourage speculative booking.	No change to the plan. The park does not provide a map of approved routes and campsites on-line because overnight bushwalking, and bushwalking in remote and off-track areas in Kakadu presents a much higher level of risk to visitor safety than marked walks. These walks can be physically demanding and require a high level of navigation skills. By not advertising the routes, people are required to do their own research and talk to local clubs to find out about the routes. Applicants need to demonstrate they meet the required level of preparedness and skill before a permit can be issued. The walking strategy (Action 6.1.10) will consider the issues around bushwalking permits and the development of more walking routes.
Section 10.8 Commercial tourism and accommodation	Commercial tourism "A small number of local tour operators have negotiated benefit-sharing agreements with Bininj/Mungguy through the NLC, under which tour groups gain access to areas that are generally not open to the public." I would be very interested to learn more about this if it might apply to bushwalking routes not currently permitted.	No change to the plan. Proposals for benefit-sharing agreements with Bininj/Mungguy will be considered on a case by case basis.
General comment	2) While some things have definitely improved in recent years, I still feel that more regulations seem to appear every year. When I had a look at the previous Kakadu Plans, the first ones grew in size, shrank back with the last one but grew back to a new record with the current plan. I believe that less red tape is likely to mean more effective management.	No change to the plan. The plan itself is a legislative instrument and enables activities otherwise restricted by EPBC Legislation. It covers the management of the park for a 10 years period and could not be condensed further.
General comment	The only way for Kakadu to have any chance of coping with its decreased funding is for all staff, both in Kakadu and Canberra, to be willing to look outside the box, to be innovative and creative in looking for ways to maximise the use of outside resources while at the same time minimising the use of the limited funds it has available.	No change to the plan necessary. The plan is not the appropriate mechanism to allocate funding to individual management programmes. Section 367 of EPBC Act specifies the mandatory content for management plans for Commonwealth Reserves. Section 367 does not specify that a management plan for a Commonwealth Reserve include costing. The management plan does not set the funding available to undertake management actions. Funding allocations for the park are determined by Government and revenue raised by the Park. Alternative sources of funding for the park will be pursued through Section 9.8 (Revenue and business development).

Plan reference	Comments in the submissions	Response
Commercial tour operator (bushwalking)		
General comment	Given the extensive consultations required by joint management, it must cost substantially more to run the park under this model. Unless something is changed or some new source of funds is found, this problem can only get worse.	<p>No change to the plan necessary.</p> <p>The plan is not the appropriate mechanism to allocate funding to individual management programmes. Section 367 of EPBC Act specifies the mandatory content for management plans for Commonwealth Reserves. Section 367 does not specify that a management plan for a Commonwealth Reserve include costing.</p> <p>The management plan does not set the funding available to undertake management actions. Funding allocations for the park are determined by Government and revenue raised by the Park. Alternative sources of funding for the park will be pursued through Section 9.8 (Revenue and business development).</p>
General comment	Finally, I must add that I was somewhat dismayed to find that the IUCN had listed Kakadu as a World Heritage area of 'significant concern' for a number of reasons. I shall refer to some specifics later in this document.	<p>No change to the plan. Commentary only.</p> <p>The Director of the world heritage program for the IUCN recently stated that he had concerns about the long-term prospects for Kakadu unless there was more work done to tackle a range of threats. But he also said Parks Australia was not to blame for the problems: "In the case of Kakadu... the management has been highly effectively done. It's clear that there are threats that are still not being addressed..... it's really this high quality monitoring that has enabled us to be sure that there is a problem that's been identified."</p> <p>Parks Australia has recently secured significant funding to address invasive species in the park, to reduce pressures on threatened species.</p>
Palmerston (Darwin) resident and long term park user		
Section 5.3 Managing park-wide threats affecting values	Feral buffaloes, horses and pigs are in almost plague proportions in the park. What ever happened to the culling program?? In my view it seemed to stop around 10 years ago, and now erosion of waterways and access track is at an all time high. The present track is almost unusable in places. All to do with the constant walking of animals etc in the wet.	<p>No change to the plan.</p> <p>Covered by Policies and Actions 5.3.9 to 5.3.16 to minimise the impacts of feral animals on park values. A park-wide feral animal control exercise was conducted in 2008–09 and since then most feral animal control programmes have focused on strategic areas of high risk rather than taking a park-wide approach, due to limited budgets.</p>
Section 6.1 Destination and visitor experience development	The practice of herding campers into designated areas contributes to a profusion of toilet paper and excreta lying around, a disgusting practice brought on by too many campers in the one area.	<p>No change to the plan.</p> <p>The park has four types of camping areas including commercial campgrounds, managed and un-managed campgrounds and bush camping areas. These have a range of facilities to suit the varying needs of visitors, provide ease of access to major attractions and do not require a permit.</p> <p>Bush camping areas have no toilet facilities and rely on campers being considerate of others. Visitors are encouraged not to disturb the trees in the area, to use gas appliances rather than fires for cooking and to take rubbish with them.</p>

Plan reference	Comments in the submissions	Response
Palmerston (Darwin) resident and long term park user		
Section 6.1 Destination and visitor experience development	Recent history on park activities will show that local visitors used to camp at many historic sites throughout the park, with no negative impacts. Campsites were left clean and rubbish left by so called traditional owners was collected and taken away. Cane Toad eradication was practised, and the only thing left behind were wheel tracks.	No change to the plan. Commentary only. The current practice of managing access to the park is a result of recognition of the significance of the World Heritage values of the park and reflect best practice. Covered by Section 6 that specifically commits to increasing visitor numbers in a sustainable way and providing opportunities for diverse and enriching visitor experiences which are promoted in an appropriate way. The potential for opening up new areas is considered through the Visitor Experience / Precinct Planning process (Action 6.1.7). Discussions are currently underway with traditional owners about potential areas to allow greater access.
Section 6.1 Destination and visitor experience development	More of the historical campsites in the park should be open for public use. How about a permit system where the user pays a fee? In this way numbers could be controlled and it would take a lot of pressure off the handful of designated sites. The erecting of "No Access" signs is not an answer to Parks Management woes. It alienates local park users even more, and should be abolished.	No change to the plan. The current practice of managing access to the park is a result of recognition of the significance of the World Heritage values of the park and reflect best practice. Covered by Section 6 that specifically commits to increasing visitor numbers in a sustainable way and providing opportunities for diverse and enriching visitor experiences which are promoted in an appropriate way. The potential for opening up new areas is considered through the Visitor Experience / Precinct Planning process (Action 6.1.7). Discussions are currently underway with traditional owners about potential areas to allow greater access.
Section 9.01 Safety and incident management	We have been accessing the area mentioned since 1974. Now Kakadu, which came into being in the mid 80's and have found a huge increase in croc population, within the park. Recent poor wet seasons have reduced fish numbers, and the crocs no doubt are getting hungrier. Some form of croc management is inevitable. Why not a trapping program, no croc is killed, and trapped crocs can be sold to a croc farm. Less croc numbers, and more food for the remaining crocs. Less chance of humans on the menu.	No change to the plan. Crocodiles are managed in accordance with the park's crocodile management strategy to minimise the risks of crocodiles to people while ensuring protection of the natural abundance of crocodile populations (Policy 9.1.4). The crocodile strategy is currently being updated and will review all the issues associated with crocodile management.

Plan reference	Comments in the submissions	Response
Palmerston (Darwin) resident and long term park user		
Section 9.01 Safety and incident management	Closing of water bodies if crocs become a threat to human life. Transparency from Parks to Public as to what the management strategy is in regards to croc management. Some years ago, rangers stated that too many big boats were creating erosion problems on waterways and stating that a size limit (maximum) was inevitable. Now it seems the opposite is the case, meaning a minimum size limit. None of the above is the answer.	No change to the plan. Crocodiles are managed in accordance with the park's crocodile management strategy to minimise the risks of crocodiles to people while ensuring protection of the natural abundance of crocodile populations (Policy 9.1.4). The crocodile strategy is currently being updated and will review all the issues associated with crocodile management.
Section 10.4 Access	Closure of certain areas of the park that were used by long term residents of the top end is a contentious issue, and the closures increases almost annually. Areas that were freely accessible are now out of bounds, no explanation given.	No change to the plan necessary. The matter is covered by Section 6.1 and the potential for opening up new areas is considered through the Visitor Experience Planning process (Precinct Planning). Discussions are currently underway with traditional owners about potential areas to allow greater access.
Section 10.4 Access	Closure of the track from old Jim Jim crossing to Alligator billabong, for most of the early dry season is a contentious issue for long term residents of the top end. Access while the track was still damp would improve track surface, flatten out animal hoof prints and minimise track surface from becoming a dust hazard.	No change to the plan necessary. The matter is covered by Section 6.1 that includes prescriptions e.g. 6.1.17, 6.1.18 that will try to ensure that public areas are open for as long as possible, particularly early in each year and consideration of implementing staged opening of sites during the shoulder seasons.
Section 10.4 Access	Comments from interstate visitors are seldom positive, about non access to huge areas of the park. No doubt leading to the decline in park users in recent years.	No change to the plan necessary. Comment noted. The matter is covered by Section 6.1 which includes actions to ensure a diverse range of experiences are available to visitors (6.1.5), management of access to visitor sites using permits (6.1.14) and use of best endeavours to ensure that public places are open for as long as possible (6.1.17).
General comment	Not enough consultation time given, school holidays, lots of people away from Darwin etc, etc.	No change to the management plan. The Board considered the timing of the public consultation and length of comment period and agreed to proceed despite the time of the year. The Board also agreed to an extension of the public comment period by two weeks resulting in a comment period of more than 10 weeks instead of the statutory 30 days. Two notifications were placed in the NT News and The Australian newspapers and key stakeholders were notified of the public comment period by letter or email and notices were circulated through user group networks.