

Adelaide and Mount Lofty Ranges Fire Management Plan and Fleurieu Peninsula Fire Management Plan

SUMMARY OF SUBMISSIONS

Introduction

The Department for Environment and Water (DEW) undertook extensive engagement in the creation of the *Adelaide and Mount Lofty Ranges Fire Management Plan* and the *Fleurieu Peninsula Fire Management Plan*. These activities included information sessions, workshops and meetings with community groups and landholders. The draft fire management plans were released for public consultation for eight weeks and closed 30 January 2026. The public were directed to provide feedback by responding to an online survey.

During the public consultation period 14 submissions were received. These responses have led to changes to the content and improvements to the presentation of information. A detailed summary of what we heard and our responses to comments received, including amendments made, is provided in the table below.

Overview of feedback on content

High-level feedback on the content of the plan includes:

- Respondents identified key values to be the protection of biodiversity and threatened species as well as protecting lives, livelihoods and communities.
- Terminology use and consistency lead to some respondents being confused with the proposed strategies.

This feedback has led to some changes, with additional information included in both the text and strategy map components of the plan, including:

- an update to the definition of the term fire management strategy to give clarity between a strategy and its implementation
- strengthening the link between our fire management plans and the planning process we follow
- map amendments for readability.

Summary of submissions

Each of the 14 submissions was numbered and the feedback carefully reviewed against 9 criteria.

Feedback that met the following criteria 1–3 resulted in alterations to the plan/s:

1. provided additional information of direct relevance to management
2. suggested an alternative approach that was considered more appropriate than that proposed in the plan
3. highlighted omissions, inaccuracies or a lack of clarity.

Feedback that met the following criteria 4–9 did not result in alterations to the plan:

4. clearly supported the plan
5. was already addressed in the plan
6. addressed issues beyond the scope of the plan, or recommended the inclusion of detailed or prescriptive information that is not appropriate for a strategic plan of this type
7. proposed an alternative approach but the recommendation of the plan was still considered the most appropriate option
8. was based on incorrect information
9. offered an open statement, or no change was sought.

A summary of all feedback received is provided in the table following. The table provides DEW's response to each comment, notes any amendments arising, and lists the criteria the comment met.

Comment number	Plan name [#]	Comment	NPWS response	Criteria	Submitter number [*]
1	AMLR & FL	Expressed view that they are excellent plans for implementing new strategies.	Noted – supportive of the plans.	9	1
2	AMLR & FL	Commented that there should be a ban on lighting bonfires in summer in the heat.	Outside the scope of the plans. The rules around lighting fires during the fire danger season are determined by the South Australian Country Fire Service (CFS).	6	1
3	AMLR	Commented that it would be good to see other forms of vegetation reduction other than burning.	Various techniques will be used to manage bushfire fuels in strategic locations as part of the fire management plan. These include slashing, selective thinning, mulching, and weed control.	5	2
4	AMLR	Expressed view that there should be a longer-term vision through weed control.	The National Parks and Wildlife Service South Australia (NPWS) has an ongoing program of weed control that contributes to both biodiversity conservation and fire management. Weed control activities are considered before and after the implementation of a fire management strategy.	5	2
5	AMLR & FL	CFS need to provide better information on fire ban districts on their website.	Outside the scope of the plans.	6	3
6	AMLR & FL	Expressed view that the only way to avoid bushfire devastation is to remove dead undergrowth, sticks, and dry old tree branches through allowing the public to remove them for home use or have the council sell as revenue.	NPWS reserves are managed for the protection of biodiversity, unique land formations and culturally significant places. As part of our overarching commitment to environmental outcomes, we are dedicated to ensuring that fire management strategies strive to maximise positive environmental outcomes as far as possible. Dead undergrowth provides habitat for the biodiversity we protect, and so any reduction is carefully managed to strategic areas using advice provided by ecologists.	7	4

7	AMLR	Considers weed management in Scott Creek zones SCCR_S01 and SCCR_S02 as critical to ensure bush condition improves.	NPWS has an ongoing program of weed control that contributes to both biodiversity conservation and fire management. Weed control activities are considered before and after the implementation of any fire management strategy.	9	5
8	AMLR	Expressed view that any burning in zone SCCR_S02 must consider populations of <i>Banksia marginata</i> which were recently burnt during the 2021 Cherry Gardens fire.	Prior to the implementation of any fire management strategy on NPWS-managed land a biodiversity assessment is undertaken by an ecologist to identify significant species' needs. This includes the review of any fire history. NPWS appreciates receipt of this knowledge and will consider the requirements of the <i>Banksia marginata</i> population prior to any prescribed burn.	5	5
9	FL	Expressed view they are happy that Hindmarsh Valley National Park is mostly zoned for conservation.	Noted – supportive of the plan.	9	5
10	AMLR & FL	Suggested the need to practise cool burns in autumn not spring to minimise damage.	An environmental assessment is undertaken by an ecologist to determine the best season for every burn. These are worked on for one to two years in advance. The assessment considers flora and fauna at the site, fuel type and condition, soil moisture, and avoiding the risk of grape smoke taint in autumn.	7	6
11	AMLR & FL	Recommended the government invest in finding cause of fires.	Outside the scope of the plans. CFS uses fire cause investigators to identify the ignition location and cause of a bushfire. Also, Operation Nomad is SAPOL's proactive policing response to the threat of arson and bushfires in South Australia during the fire danger season. Operation Nomad targets arsonists and those people considered high risk of starting bushfires and works with the community to educate them on how to stay safe.	6	6

12	AMLR & FL	Suggested consultation with environmental stakeholders and First Nations to provide habitat for birds.	In developing these plans we consulted with many environmental groups, including Birds SA, SA Nature Alliance and SA Field Naturalists. Prior to the implementation of any fire management strategy on NPWS-managed land a biodiversity assessment is undertaken by an ecologist to identify significant species' needs. These ecologists also consult with other experts as required. Aboriginal cultural burning in South Australia is led by First Nations Peoples, as custodians of their culture and Country. DEW is on a journey to learn more about cultural burning and is in the early stages of working with First Nations groups to understand their fire-related interests and support their cultural burning practices.	5	6
13	AMLR & FL	Expressed view that plans could be improved by involving other departments such as SAPOL as many fires are started by humans.	Outside the scope of the plans. These plans are designed to reduce the impact of a bushfire impacting life, property and the environment. We use the knowledge of where fires start, by human cause or otherwise, to implement fire management strategies. We also work closely with CFS in making information on bushfire prevention available to the public. Operation Nomad is SAPOL's proactive policing response to the threat of arson and bushfires in South Australia during the fire danger season. Operation Nomad targets arsonists and those people considered high risk of starting bushfires and works with the community to educate them on how to stay safe.	6	6

14	AMLR & FL	Expressed view that some research indicates leaving understorey intact increases safety.	Fine fuel within the understorey drives the intensity and rate of spread of fire. Evidence for this has been demonstrated in numerous fire behaviour research studies.	7	6
15	AMLR	Expressed view that roadside vegetation needs to be better managed to enable fire break.	Outside the scope of the plan. Roadside vegetation is a local council management issue.	6	7
16	AMLR	Suggested better maintenance of tracks to reduce the risk of being trapped in a fire.	NPWS develops and maintains tracks on NPWS-managed land to a standard set by the South Australian State Bushfire Coordination Committee. Tracks outside of parks are outside the plan's scope and are the responsibility of other agencies or private landowners. CFS can assist private landowners to plan for bushfire.	6	7
17	AMLR	Preference for individual park pdf document.	The creation of a region-wide plan recognises that the risks and impacts of a single bushfire are not restricted to a single park or local area in the region. A region-wide plan also enables better coordination of fire management activities that considers changing risk profiles, feasibility and resource allocations across an entire management area. The fire plans can be saved as a pdf and/or printed should this be individual preference. However, interactive functionality is lost using this method.	7	8
18	AMLR	Preference for manual fuel reduction and mulching in situ over prescribed burning, and that zone ALDI_S01 is supported through pruning and mulching any excess fuel load.	Before any strategy is implemented, an assessment is made for the most effective and efficient fuel reduction method. In many instances burning has a dual benefit of reducing fuel along with environmental benefits e.g. germinating fire responsive plants. Mulching in situ is an implementation option available to fire managers and is used when appropriate.	5	8

19	AMLR	Suggested using stormwater inflows and outflows to maintain healthy vegetation as a fire reduction strategy.	Outside the scope of the plan. Storm water flows are not controlled by NPWS.	6	8
20	AMLR	Suggested narrowing the zone ALDI_S01 north of Cox Road due to previous boundary clearing.	Fire management plans set strategic priorities about where, how, and why we need to undertake risk reduction activities to reduce the risk of bushfire and manage the environment. Previous activities that reduce the fire risk are considered before strategy implementation. However, as activities on private land are out of our control, our strategy provides flexibility to lessen fire risk.	7	8
21	AMLR & FL	Advocates for the use of grazing in areas of significant fire danger to reduce fuel load.	NPWS considers surrounding grazed land in reducing the risk addressed by a fire management plan. Grazing on NPWS-managed lands is not generally used as a strategy for fuel reduction due to environmental impacts.	7	9
22	AMLR & FL	Suggests an increase in funding to reduce undergrowth.	Outside the scope of the plans.	6	9
23	AMLR & FL	Believes that increased clearing should be allowed around housing to reduce fuel load and risk.	Outside the scope of the plans. There are standard distances that every homeowner can clear around a dwelling or building to help reduce the risk of a fire impacting their built assets. The Native Vegetation Council and CFS provide guidance on acceptable clearance distances and methods.	6	9

24	AMLR & FL	Expressed a preference to save lives and property over the environment.	Achieving balanced fire management outcomes for human life, property, environment and cultural assets can be complex. National and state policies place priority on the protection of human life (i.e. safety for firefighters and the community). NPWS fire management seeks to achieve environmental objectives consistent with the protection of human life but where these values conflict, human life is prioritised. However, as part of our overarching commitment to environmental outcomes, NPWS is dedicated to ensuring that fire management strategies strive to maximise positive environmental outcomes as far as possible.	5	9
25	AMLR & FL	Very supportive of the objectives and purpose of the plan. StoryMap is interactive and engaging.	Noted.	4	10
26	AMLR & FL	Questions whether the StoryMap will be a downloadable document as finds it difficult to locate information in the StoryMap format.	The fire plans can be saved as a pdf and/or printed should this be individual preference. However, interactive functionality is lost using this method.	7	10

27	AMLR & FL	Expressed that the use of the word 'strategies' needs to be clearer and consistent. Confused by term 'strategies' when mapping the zones and in the text. Suggests that the definition is changed to outline that zones are not strategies, but that strategies are associated with each type of zone. Also, replace the word activities with strategies in the following sentence: 'Fire management zones identify where specific fire management activities will be undertaken. The type of activity depends on the zone and its objectives.'	Thank you for this feedback. Zones are one of the strategy options available to NPWS. We will make a change to the fire management strategies text to improve clarity of the definition. See the plans' strategy options section for a complete list of the strategies we use.	3	10
28	AMLR & FL	Seeks clarity over the definition of a strategic fuel management zone compared to a buffer zone. The current description of this zone implies similar objectives, increasing the risk that fuel reduction is prioritised over biodiversity values.	Strategic fuel management zones (s-zones) aim to reduce risk to life and property, along with environmental values. S-zones can be designed with greater flexibility around how that risk reduction is achieved compared to bushfire buffer zones, and they don't require fuel to be below a specified level across the entire zone. This allows for a mosaic of vegetation age classes for environmental purposes.	9	10
29	AMLR & FL	Provides suggested improvements to the strategies map: a. Use sub-headings in the table of contents/legend to further clarify that zones are not strategies.	Changes will be made to the StoryMap text to clarify strategy meaning. No changes will be made to the map.	7	10

		b. The zones could be less dominant in colour, so that the strategies are easier to see.	Zones form the base layer and use a standard colour across the NPWS fire management plans. An increase in transparency will be made to improve viewability of the imagery.	3	10
		c. The attribute tables associated with each strategy use the word strategy in the table, but in the zone tables the word objective is used instead. Suggest using the word strategy and outlining the type of burn as the strategy e.g. ecological burn, prescribed burn etc.	The interactive maps show the type of strategy for a given location, what values the strategy is aiming to protect or manage, and its objective. The term objective in the attribute table refers to the objective of each strategy.	7	10
		d. There is a lot of information in the tables that doesn't add value.	The tables aim to provide as much information as possible to help inform a variety of community sectors of the reasons for each strategy.	7	10
		e. Suggest removing the grey parcels of Crown land that are not clickable and don't appear in the legend or provide an explanation.	The Crown land parcels in grey are included on the map to indicate the area of land included in the plans. If possible, an amendment will be made to the legend for clarity.	3	10
30	AMLR & FL	Advocates for the use of good news stories to counteract the negative perception of prescribed burns, to promote the concept of fire-dependent ecosystems and the work being done to prepare for bushfires.	Outside the scope of the plans. NPWS has a team that promotes the work that we do. Articles can be found via social and mainstream media, newsletters and on our website.	6	10
31	AMLR	Seeks clarity on why there is no conservation zone in Mark Oliphant in areas of core bandicoot habitat.	Mark Oliphant is an extreme risk park within the region; numerous significant fires have burnt in and around the park. Burns within the park will be designed to optimise the amount of bandicoot habitat while reducing the bushfire risks.	9	10

32	AMLR & FL	Confused by the strategy examples provided – feels they are not strategies as per the definition at the start of the plan, they are case studies of fire management programs.	Some of the strategy examples provided in the plans illustrate how various tools and on ground actions support the strategies.	9	10
33	FL	Ensure the plan acknowledges the Ngarrindjeri people as the First Nations group whose lands are the subject of this plan.	Noted. Included in the plan.	5	11
34	FL	Would like the plan to include a cultural fire management strategy and allocation of resources to engage and support in consultation, planning and implementation of fire management. Would like the plan to include First Nations' aspirations for Country.	Mapped Indigenous land management areas (ILMA) for places where shared outcomes are identified. Aboriginal cultural burning in South Australia is led by First Nations Peoples, as custodians of their culture and Country. DEW is on a journey to learn more about cultural burning and is in the early stages of working with First Nations groups to understand their fire-related interests and support their cultural burning practices.	1	11
35	FL	Suggests more detail in the opening paragraph acknowledging First Nations people. The information in the 'planning area' section could be elevated for this purpose.	Acknowledgement of the Ngarrindjeri people as Native Title holders across parts of the plan has been moved to the opening paragraph.	2	11
36	FL	Proposes that on-country engagement with Ngarrindjeri Aboriginal Corporation members, especially the newly formed Yarlwar-Ruwe ranger team, be prioritised by National Parks and Wildlife Service SA staff responsible for implementing the plan.	Noted. On-country implementation of the plan has now been included in the plan. When the plan is ready for implementation, consultation will occur prior to any action.	2	11
37	FL	Suggests additional information to the 'Fire in the environment' section that	Additional sentence included in this section.	1	11

		where cultural practice is reinvigorated, environment health and community bushfire risk benefits.			
38	AMLR & FL	Disagrees with the scientific knowledge that the plans are based upon.	The effectiveness of prescribed burning in reducing the rates of spread, intensity and spotting potential of bushfire has been demonstrated across all states of Australia. An Australian Institute for Disaster Resilience report on the role of fire in the Australian landscape and the origins and evidence that underpins the use of prescribed fire, is available as part of its National Burning Project.	9	12
39	AMLR & FL	Does not support the use of the StoryMap format due to readability, accessibility and ability to make amendments. Suggests printed document.	Advances in technology have allowed for a more interactive fire management plan that provides increased detail. The fire plans can be saved as a pdf and/or printed should this be individual preference. However, interactive functionality is lost using this method.	7	12
40	AMLR & FL	Disagrees with prescribed burning in the AMLR as they have research that shows no positive effect. Suggests that DEW should be prioritising the protection of areas long unburnt as they provide habitat for most species.	The effectiveness of prescribed burning in reducing the rates of spread, intensity and spotting potential of bushfire has been demonstrated across all states of Australia. An Australian Institute for Disaster Resilience report on the role of fire in the Australian landscape and the origins and evidence that underpins the use of prescribed fire, is available as part of its National Burning Project. NPWS fire management strategies are designed to help maintain a fire regime with prescribed burns, to create a mosaic of vegetation of different ages to benefit local	7	12

			plants and animals. They also help reduce the chance of the entire park, or large areas in it, from burning in a single, uncontrolled bushfire, risking local plant and animal extinction.		
41	AMLR & FL	Suggests the section on monitoring includes more detail i.e. what is monitored, how, for how long? Where can the public and researchers access the data?	Further information on what and how we monitor is included in the fire management plans and on our website. An adaptive management strategy is being developed that will provide more information about how monitoring priorities are being identified. Currently, monitoring data is not curated in a manner that is designed to be publicly shared; however, species records are entered into the Biological Databases of South Australia which can be accessed by the public. Through the implementation of the adaptive management strategy, there will be increased focus on sharing monitoring priorities and outcomes, the results of research partnerships, and progress towards addressing critical knowledge gaps.	7	12
42	AMLR & FL	Suggests an explanation be included on how NPWS strategic priorities inform and are informed by broader cross-tenure bushfire risk planning, particularly in anticipation of the transition to the next generation of BMAP. This would improve alignment with whole-of-landscape risk management and provide a clearer strategic context for each plan's direction.	Outside the scope of the AMLR and FL plans, however the inclusion of this statement will be included on the broader NPWS fire management plan web page .	6	13
43	AMLR & FL	Suggests highlighting how upcoming climate scenarios could cause	While the plans set long-term vision, they are not static. They are designed to be flexible and responsive,	6	13

		temporary shifts in priorities outside the usual 5-year review cycle.	including allowing for updates as new information becomes available. NPWS acknowledges the effect of climate change on bushfire risk and includes climate predictions and how these will influence fire risk on our web page.		
44	AMLR & FL	Recommends including strategic wording about how zoning outcomes on NPWS land are expected to reduce residual risk beyond park boundaries.	Both plans include the following: <i>While fire management focuses on public land, it also helps reduce bushfire risk to neighbouring properties and to ecosystems that continue beyond park boundaries.</i>	5	13
45	AMLR & FL	Recommends including strategic wording about how zoning outcomes on NPWS land are expected to inform priority areas for complementary treatment on adjacent tenures under BMAP.	NPWS fire management plans may help adjacent landholders to identify complementary treatments on their land however, as we can't control activities outside of the land we manage, this is not within the scope of our plans.	6	13
46	AMLR & FL	States that the plan clearly supports suppression outcomes. These elements are critical to firefighter safety and suppression effectiveness, especially in the AMLR, where rapid escalation is common during severe fire weather.	Noted.	4	13
47	AMLR & FL	States that the plan appropriately recognises bushfire risk reduction as a shared responsibility; with opportunities in the next generation of BMAP to convey how NPWS strategies connect and interact with councils, SA Water, Forestry SA, and private landholders.	Noted.	4	13

48	AMLR & FL	Suggests including other regional protected areas in the plan in addition to DEW-managed land.	NPWS can only make strategic fire management planning decisions regarding land that it manages. Other landholders can seek guidance through CFS bushfire management area plans that encompass whole landscapes.	7	14
49	AMLR & FL	Recommends that fire management activities are limited to the maximum extent necessary when planning prescribed burns. The plans must follow the mitigation hierarchy with actions located where they will have the least impact on the environment.	Strategies are planned with fire management and environmental experts. They plan for the best risk reduction with the least impact on environmental values.	5	14
50	AMLR & FL	Provided a list of suggested plants to reduce bushfire when revegetating and suggested their use in supporting identified strategies in the Fleurieu Peninsula.	Outside the scope of the plan. NPWS thanks you for providing this information and will provide this knowledge to the region for use in any re-planting activities.	6	14
51	AMLR & FL	Suggests amending the implementation section of the plan to reference that ecologists conduct the environmental assessments referred to in the plan. An alternative suggestion is made to refer to the environmental assessment procedure.	Prior to the implementation of any fire management strategy on NPWS-managed land a biodiversity assessment is undertaken by an ecologist to identify significant species' needs. Changes to this section of the plan will be strengthened to include a link to our managing environmental risks webpage .	3	14
52	AMLR & FL	Suggests that location, frequency and benefits of burns are clearly articulated to support decision making.	Detailed information is captured in the mapping to explain the where, how and when the fire management strategy will be implemented.	5	14
53	AMLR & FL	Recommends that prescribed burns are planned so that they don't clear understory vegetation that is important for smaller native birds.	Understorey vegetation is a significant contributing factor in the movement of bushfires. Fine fuel within the understorey drives the intensity and rate of spread. Environmental assessments will highlight risks to	5	14

		Areas that are cleared can then be colonised by larger competitors (study provided).	significant species and adjust the implementation if possible.		
54	AMLR & FL	Suggests removing prescribed burns from the bushfire risks section map. Inclusion in this section could damage public depiction. Perhaps include in strategy options section. This map could visualise prescribed burns, in addition to fire access tracks and fuel breaks.	The map is intended to address all fire history. In future fire management plans, consideration will be made to separating fire history from the fire risk section.	2	14
55	AMLR & FL	Supports the plans' intent to reduce the impact of bushfires on hollow-bearing trees.	Noted.	4	14
56	AMLR & FL	Supports the plans' efforts to address weed management.	Noted.	4	14
57	AMLR & FL	Recommends further research into the use of 'cool' cultural burning as a potential fire management strategy is encouraged in conjunction with consultation with relevant First Nations peoples.	Aboriginal cultural burning in South Australia is led by First Nations Peoples, as custodians of their culture and Country. DEW is on a journey to learn more about cultural burning and is in the early stages of working with First Nations groups to understand their fire-related interests and support their cultural burning practices.	2	14
58	AMLR & FL	Strongly urges the plans to prioritise developing or enhancing fire water in the regions.	Fire water infrastructure has been considered in the development of these plans. The plans have identified locations for additional water infrastructure.	5	14
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