



Analysis of Public Submissions

The Kati Thanda – Lake Eyre National Park Draft Management Plan 2024

The Kati Thanda – Lake Eyre National Park Draft Management Plan 2024 was released for public consultation from 19 April 2024 to 19 July 2024.

During that time, the public had the option to provide feedback on the draft plan by providing a written submission or completing a survey on the YourSAy website.

Fifty (50) written submissions were received (comprised of formal letters and informal emails or online forms) and Two Hundred and Thirty Two (232) respondents completed the YourSAy survey.

Table 1 outlines the submissions received and Table 2 summarises the feedback received and how it was considered in finalisation of the amendments.

Survey respondents were not required to provide a name in order to complete the survey and many respondents chose not to do so. Survey responses have been numbered and written free text comments from the surveys have been reflected in the analysis of submissions table.

All submissions on the draft management plan amendments have been reviewed against the following criteria:

Feedback meeting criteria 1-3 below, result in alterations:

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

Feedback meeting criteria 4-9 below **do not** result in alterations:

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



Table 1 – Written submissions

Sub#	Name	Respondent
1	Pavel Sergeyev	Interested Individual
2	Garry Overton (x2)	Interested Individual
3	Denis Hornsby	Interested Individual
4	Bob Backway	Lake Eyre Yacht Club
5	Louise Bird	Heritage SA
6	Katherine Tuft	Arid Recovery
7	Saras Kumar	Conservation Management
8	Graham Blair (x2)	Interested Individual
9	Shaun de Bruyn	TICSA
10	Roger Wickes	Pastoral Board of SA
11	Nick Jones	SATC
12	Sam Murray	Indigenous Desert Alliance
13	Sophia Yu Martucci	Interested Individual
14	Agency submission	SA Arid Lands Landscape Board
15	Nicholas Hann	Interested Individual
16	Kirsty Bevan	Conservation Council SA
17	Peta Abbott	AMEC
18	Bronwyn Dodd	Arabana Aboriginal Corporation
19	Mitchel Pearse	Interested Individual
20	Robert Blair	Interested Individual
21	Graham Nice	Interested Individual
22	Angela & David Eyre	Interested Individual
23	Phil Ridgeway	Interested Individual
24	Chris Radbone	Interested Individual



25	Kym Brougham	Interested Individual
26	Phillip Mitchell	Interested Individual
27	Andrei Doroch	Interested Individual
28	Graeme Clarke	Interested Individual
29	GA Clemow	Interested Individual
30	Janette Milera	Interested Individual
31	Phillip McBride	Interested Individual
32	Kingsley & Leanne Clark	Interested Individual
33	Russell Brown	Interested Individual
34	Janis Bronemann-Hine & Colin Hine	Interested Individual
35	Paul Lewis	Interested Individual
36	Mitchell Harnett	Interested Individual
37	Michael Skopal	Interested Individual
38	Emily Bradley	Interested Individual
39	Ich37718	Interested Individual
40	Andrew Gartrell	Interested Individual
41	Name not published per request	Interested Individual
42	James Trevaskis	Interested Individual
43	Paul Reader	Interested Individual
44	Gloria O'Rourke	Interested Individual
45	Neil Smith	Interested Individual
46	Christine Green	Interested Individual
47	Robyne Kerr	Interested Individual
48	Peter Delaney	Interested Individual
49	Louise Henderson	Interested Individual
50	Kath Henderson	Interested Individual



Table 2 - Analysis of feedback

Number	Comment	Submission From	Plan Altered	Response	Criteria
YourSAy survey responses (free text)					
1.	Expressed the opinion that the park should remain open to all and/or that it is not appropriate to exclude visitors from accessing the park or parts of the park.	YourSAy survey respondent # 1, 2, 3, 5, 6, 8, 9, 11, 13, 15, 16, 17, 18, 23, 24, 25, 26, 28, 29, 31, 32, 34, 35, 37, 38, 40, 42, 43, 44, 46, 47, 55, 62, 63, 65, 69, 73, 75, 76, 86, 87, 88, 89, 92, 96, 100, 102, 104, 108, 111, 112, 120, 121, 122, 126, 127, 128, 129, 130, 131, 136, 140, 145, 147, 149, 152, 154, 156, 157, 160, 164, 165, 166, 168, 170, 171, 174, 177, 178, 186, 187, 191, 192, 194, 195, 196, 197, 199, 201, 202, 205, 206, 212, 222, 223, 226, 228, 229, 232	Yes	These submissions opposed in principle any restriction to a national park. The majority were based on the misunderstanding that the park is proposed to be closed or that activities which have previously been allowed are being removed. The final plan has been updated to clarify further that the public are not being excluded or restricted from visiting the park.	3
2.	Expressed a genuine desire to undertake recreational activities on the lake surface	YourSAy survey respondent # 32, 60, 82, 105, 134, 150, 185, 191, 210, 223	No	Under the <i>National Parks and Wildlife Act 1972</i> activities including driving, sailing, and swimming are already prohibited without permission. This plan sets a policy position that recreational activities on the lake bed will not be allowed in future. The only additional restriction proposed is a request not to walk on the dry lake bed. It is noted that any footprints or tyre tracks on the lake surface damage the fragile salt crust and remain visible until the next flood. Restricting visitors from entering the lake bed will ensure the lake is kept pristine for all visitors to enjoy.	7



				DEW is committed to respecting, celebrating and sharing the cultural lore of Arabana at Lake Eyre/Kati Thanda. Opportunities for visitors to learn more about Arabana's cultural lore and connection to Country will provide a more enriching experience for all visitors. NPWS will continue to communicate that the lake is best experienced from the shore, the viewing points, or the air, and that visitors are welcomed to experience the park in a culturally and environmentally appropriate way.	
3.	Expressed support for the proposed policy position to not allow future access to the lake surface for recreational activities	YourSAy survey respondent # 22, 115, 153, 214, 215, 216, 217, 218, 219	No	Submissions supported the plan with no changes sought.	4
4.	Expressed support for the protection and preservation of the lake	YourSAy survey respondent # 24, 35, 121, 214, 217, 218	No	Submissions supported the plan with no changes sought.	4
5.	Commented that there should be more signage, information, viewing points and/or camping opportunities to encourage people to visit	YourSAy survey respondent # 7, 116, 190, 193, 214	No	The plan acknowledges the need for increased signage and other opportunities for visitors to experience and enjoy the park.	5
6.	Expressed the view that the main themes in the plan do not reflect the interests of the general public	YourSAy survey respondent # 12	No	No change. The plan addresses the major management themes of the parks and gives management direction taking into consideration the values of the park and balances these with the interests of stakeholders.	9
7.	Made general statements or expressed opinions that are out of scope of the planning process	YourSAy survey respondent # 14, 20, 30, 33, 41, 47, 51, 52, 57, 59, 62, 63, 64, 70, 71, 72, 77, 80, 81, 83, 84, 85, 94, 95, 97, 101, 103, 106, 107, 109, 114, 117, 118, 119, 123, 124, 125, 132, 133, 135, 138, 139, 142, 143,	No	No changes sought	9



		144, 146, 148, 157, 162, 165, 169, 175, 177, 179, 183, 188, 190, 198, 200, 202, 205, 221, 223			
8.	Commented that the current access routes and visitor nodes should remain open and accessible to all visitors	YourSAy survey respondent # 50, 82,	No	The plan sets out that all visitors are welcome to continue to access via the Pastoral Access Routes (PAR) to the existing visitor nodes, subject to seasonal closures or temporary closures of the PARs.	5
9.	Expressed the view that visitor safety considerations are too comprehensive.	YourSAy survey respondent # 53	No	Managing visitor safety and providing appropriate information to ensure the public are prepared for outback is a key consideration of park planning.	7
10.	Commented on the challenge of managing invasive species in areas that are inaccessible	YourSAy survey respondent # 58	No	No changes sought. These challenges are already acknowledged in the plan.	5
11.	Commented on the environmental impacts of mining in the Lake Eyre Basin	YourSAy survey respondent # 105	No	Mineral and Petroleum Exploration and production is regulated through the <i>Mining Act 1971</i> and the <i>Petroleum and Geothermal Energy Act 2000</i> . These regulatory frameworks are set out in the plan. The management plan does not have authority to override these frameworks.	6
12.	Commented that lake bed access should be left as it currently is	YourSAy survey respondent # 134	No	Under the <i>National Parks and Wildlife Act 1972</i> activities including driving, sailing, and swimming are already prohibited without permission. This plan sets a policy position that recreational activities on the lake bed will not be allowed in future. The only additional restriction proposed is a restriction on walking on the dry lake bed.	7
13.	Commented that there should be no restrictions to scenic flights	YourSAy survey respondent # 185	No	Landing on the lake bed is not permitted under the <i>National Parks and Wildlife Act 1972</i> . Scenic flights are not otherwise regulated by NPWS. A 'fly neighbourly' agreement establishes practices to ensure a positive and safe experience for all visitors.	8
14.	Commented that any tourism enterprises should be funded by the operator, and any funds from NPWS tourism enterprises should be put back into managing the park	YourSAy survey respondent # 185	No	Commercial tours in parks are funded by the operator. Funds collected from national parks fees are paid into a general reserves fund which is used to support park operations across the State.	6
15.	Queried whether traditional owners collect money from visitors for entry	YourSAy survey respondent # 189	No	Funds collected from national parks fees are paid into a general reserves fund which is used to support park operations across the State.	6



16.	Commented that consultation should be held in the community as not all people have internet access	YourSAy survey respondent # 207	No	No changes to the plan sought. Consultation was made as accessible as possible throughout the planning process, including providing hard copies of the plan when requested.	9
17.	Queried whether permanent flooding of the lake has been considered	YourSAy survey respondent # 209	No	Outside the scope of this plan. The Lake Eyre Basin plan and intergovernmental agreement sets out the long-term management strategies for the Lake Eyre Basin.	6
18.	Commented that Government needs to work with Aboriginal traditional owners in order to protect and maintain the parks	YourSAy survey respondent # 219	No	No changes sought. DEW works with traditional owners in the protection and management of these parks.	5
Written submissions					
19.	Provided general support for the amendments in managing park conservation values.	Written respondent #6, 18, 12, 19.	No	Submissions supported the plan with no changes sought.	4
20.	Noted that the plan should include references to the palaeontological significance of Lakes Kanunka, Pitikanta and Ngapakaldi (Tertiary Vertebrate Fossil Sites) State Heritage Place, and the legislative mechanisms in place for their protection.	Written respondent # 5.	Yes	Changes have been made to include reference to the Lakes Kanunka, Pitikanta and Ngapakaldi (Tertiary Vertebrate Fossil Sites) (SHP 14418) designated place of palaeontological significance in the 'What are we looking after?' section of the plan. A further point has been added to the 'What are the challenges and opportunities?' section to recognise these research opportunities. The Directions for management section has been amended to include reference to the <i>Heritage Places Act 1993</i> .	3
21.	Raised inconsistencies in the use of 'lore' and 'law' throughout the plan and recommended 'lore' is used consistently.	Written respondent # 7.	Yes	Plan had been amended as suggested.	3
22.	Raised concerns that the plan does not identify strategies to offset the changed visitor experience opportunities, to enhance the existing opportunities, or identify culturally appropriate experiences that commercial tour operators can deliver.	Written respondent # 9.	No	The visitor experience opportunities at Kati Thanda-Lake Eyre National Park are not substantially changing. Under the <i>National Parks and Wildlife Act 1972</i> activities including driving, sailing, and swimming are already prohibited without permission. This plan sets a policy position that recreational activities on the lake bed will not be allowed in future. The only additional restriction proposed is a restriction on walking on the dry lake bed. Restricting visitors from entering the lake bed will ensure the lake is kept pristine for all visitors to enjoy.	5



				DEW is committed to respecting, celebrating and sharing the cultural lore of Arabana at Lake Eyre/Kati Thanda. This includes through enhancing the existing tourism opportunities and identifying additional opportunities that are culturally appropriate. This is already addressed in the plan.	
23.	Noted that the plan does not discuss third-party accreditation for Commercial Tour Operators (CTOs)	Written respondent # 9.	Yes	The plan has been amended to clarify the process for CTO applications that seek to share cultural information or interpretation.	3
24.	Raised concerns regarding potential for livestock to stray onto the unfenced lake and the need to retrieve them.	Written respondent # 10.	No	The plan already notes that access to the lake bed is required for essential management purposes. DEW recommends that the Pastoral Board continue to engage with NPWS and with Arabana and Dieri Aboriginal Corporations on shared land management challenges such as fencing and wandering stock.	5
25.	Noted that clarification on access requirements is required in relation to the causeway between Lake Eyre North and Lake Eyre South, accessed via Muloorina Station and the Level Post Bay Pastoral Access Route (PAR). Pastoral lessees either side of this causeway will need to ensure continued access is available for the purposes of retrieving livestock and operating their pastoral business.	Written respondent # 10.	No	The PAR is already shown in the plan. The causeway is not open to the public and should be signposted. Pastoral lessees either side of this causeway will have continued access.	5
26.	Noted that the Pastoral Board should be referenced on page 14 of the plan in regards to working with pastoralists to improve access routes. Noted that Level Post Bay PAR should also be referenced in the plan.	Written respondent # 10.	Yes	Plan has been amended on page 14 to include reference to the Pastoral Board.	3
27.	Noted other circumstances in which a PAR may be closed that should be referenced in the plan.	Written respondent # 10.	Yes	Plan has been amended to include reference to other circumstances under which PARs may be closed.	3
28.	Noted that the references on page 13 of the plan need to be updated to reflect that wild dog control is guided by the <i>Landscape South Australia Act 2019</i> and <i>Landscape Regulations 2020</i>	Written respondent # 14.	Yes	Change has been made to the plan as suggested.	3



29.	Noted that the plan should also recognise and list the threat that Large Feral Herbivores (Camels, donkeys and horses) pose to the area.	Written respondent # 14.	Yes	An amendment has been made to the 'what are the challenges and opportunities' section on page 11 of the plan to recognise large feral herbivores as suggested. The plan also acknowledges the challenges of managing these pest species in the text on page 11.	3
30.	Recommended that the Government, subject to consultation with and consent from the Arabana and Dieri nations, at minimum, exclude the lake and lake bed of Kati Thanda-Lake Eyre from the operation of both the <i>Petroleum and Geothermal Energy Act 2000</i> and <i>Mining Act 1971</i> , or legislate/regulate the requirement for First Nations' consent before such activity can commence.	Written respondent # 16.	No	Mining activities are regulated under the <i>Petroleum and Geothermal Energy Act 2000</i> and <i>Mining Act 1971</i> . Processes and protocols are in place for cultural and environmental protections, and DEW and the Arabana and Dieri Corporations have statutory roles in these processes which are acknowledged in the plan.	6
31.	Supported the draft plan's content regarding the provision for exploration and extraction of mineral and petroleum resources within Kati Thanda-Lake Eyre National Park.	Written respondent # 17.	No	No change. Supportive of plan.	4
32.	Recommended that the plan include geological information of the Kati Thanda-Lake Eyre NP to support nature-based tourism and an understanding of the existing minerals exploration and value of mining in the adjacent regions of the mineral rich Gawler Craton.	Written respondent # 17.	No	No change. The plan addresses culturally appropriate tourism as a future opportunity subject to access restrictions and under the guidance of Arabana Aboriginal Corporation. It is not considered appropriate to provide further detail on these opportunities in a strategic plan of this nature.	6
33.	Recommended that DEW accelerate an updated Multiple Land Use Framework to support co-existence of mineral exploration and mining with Aboriginal culture and heritage, tourism and other sectors such as renewables, agriculture and pastoral activities in this region and across South Australia.	Written respondent # 17.	No	Outside the scope of this plan.	6



34.	Expressed the view that all visitors should be allowed to recreate on Lake Eyre/Kati Thanda.	Written respondent # 23, 24, 25, 47, 48.	No	The plan provides detail on the visitor experiences that are available and proposes strategies to ensure these are maintained and enhanced.	7
35.	Expressed opposition and/or raised concerns that access to a national park was proposed to be banned and that people would no longer be permitted to visit Kati Thanda – Lake Eyre National Park.	Written respondent # 1, 2, 3, 4, 8, 13, 15, 20, 21, 22, 26, 27, 28, 29, 31, 32, 33, 34, 35, 36, 37, 39, 40, 41, 42, 44, 45, 46, 47, 50.	Yes	The plan provides detail on the visitor experiences that are available and proposes strategies to ensure these are maintained and enhanced. However, amendments have been made to the proposed final plan to clarify the regulatory frameworks of a national park. The majority of these submissions opposed in principle the proposal to restrict activity in an area of a national park. It is noted that under the <i>National Parks and Wildlife Act 1972</i>, driving off-track, swimming, boating, and landing of aircraft are already not allowed. The park plan proposed to not allow for these activities due to the cultural and environmental significance of the lake. DEW is committed to respecting, celebrating and sharing the cultural lore of Arabana at Lake Eyre/Kati Thanda. Opportunities for visitors to learn more about Arabana's cultural lore and connection to Country will provide a more enriching experience for all visitors. It is also noted that any footprints or tyre tracks on the lake surface damage the fragile salt crust and remain visible until the next flood. Restricting visitors from entering the lake bed will ensure the lake is kept pristine for all visitors to enjoy. NPWS will continue to communicate that the lake is best experienced from the shore, the viewing points, or the air, and that visitors are welcomed to experience the park in a culturally appropriate way.	8
36.	Made general comments or expressed views that are outside the scope of the park management plan.	Written respondent # 1, 2, 3, 8, 13, 15, 20, 24, 27, 29, 30, 31, 32, 33, 35, 37, 39, 40, 43, 44.	No	No change. Out of scope of the plan.	6