

## Public comment submission form for the draft management plan for Kakadu National Park

### Important information about making submissions on the draft management plan

The Kakadu Board of Management has prepared a new draft management plan for the park. Once finalised, the plan will guide management of the park over the next 10 years.

The Kakadu Board of Management is keen to receive your comments on the draft management plan. The draft plan is open for public comment from 3 December 2014 until 13 February 2015. To have your say, return your submission via:

1. Email address: [KakaduPlan@environment.gov.au](mailto:KakaduPlan@environment.gov.au) or
2. Postal address: Planning Officer, Kakadu National Park  
PO Box 71  
Jabiru NT 0886

Comments on the draft management plan must be sent by 13 February 2015 to be considered. Comments sent after that date, or to a different address will not be taken into account in finalising the plan.

This public comment submission form is provided to help you prepare your comments on the draft management plan. In making comment on the draft plan please be as clear and as specific as possible and provide references to the sections of the plan you are commenting upon.

### Using this form

Before you start entering your comments into this submission form, please save the form on to your computer. Then you can enter your comments, save the form and send it to us via email or through the post to one of the above addresses.

In completing this form please comment only on the parts that interest you. You do not need to comment on every part. Please be as clear and as specific as possible and provide any pages references to the sections of the plan you are commenting upon. Please also include any suggestions for changing the plan.

Please note that all comments may be treated as public documents and may be made public on the department's website. If you do not want your personal information published, please make this clear in your comments and your personal information will be redacted before your comments are made public. Personal information provided to us will be dealt with in accordance with the Privacy Act 1988 and the Australian Privacy Principles. A copy of our Privacy Policy is online at: [www.environment.gov.au/privacy-policy](http://www.environment.gov.au/privacy-policy). Your personal information may be disclosed to the Minister and relevant government agencies. It may also be disclosed where it is required by law or where it is reasonably necessary for law enforcement.

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### Your details

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Do you give permission to have your personal information published? Yes / No	Yes

### Comments on particular parts of the draft management plan for Kakadu

PART A - INTRODUCTION	
1. A description of Kakadu National Park	Seems good to me. I have no issue with anything here.
2. Management plan framework	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.
PART B - GENERAL PROVISIONS AND IUCN CATEGORY	
3. General provisions and IUCN Category	<p>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> <p>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.</p> <p>The IUCN website compares category II to category VI, saying that <b>"Category II will not generally have resource use permitted except for subsistence or minor recreational purposes."</b> Section two mentions that <b>park management could be improved by</b> "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 IUCN definition of category VI states that it is, "Protected areas that conserve ecosystems and habitats, together with associated cultural</p>

	<p>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>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> <p>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>
PART C – MANAGING KAKADU	
4. Joint Management	
4.1 Making decisions and working together (Board of Management)	<p>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> <p>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?</p> <p>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> <p>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.</p>
4.2 Making decisions and working together (on country)	<p>Management issues</p> <p>"Consultation and decision-making processes and protocols need to be clear and consistently followed. Records of consultations and decisions need to be properly kept."</p> <p>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.</p> <p>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</p>

	<p>communication both to the traditional owners and the wider community, the better.</p>
<p>4.3 Bininj/Mungguy training and other opportunities</p>	<p>"The Director will work with Bininj/Mungguy to promote and facilitate Bininj/Mungguy tourism and other enterprise opportunities and training for them where appropriate." I like the idea.</p> <p>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.</p> <p>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.</p> <p>On the purely training and informational side, I have offered to take park staff and/or traditional owners on my trips so they could see exactly what we do and what they would need to do to become a guide. To date, I have had four park staff, all Balanda, accompany parts of trips. Only one of those was for more than two nights.</p>
<p>5. Looking after culture and country</p>	
<p>5.1 Looking after culture</p>	<p>"The condition of rock art in the park continues to suffer the impacts of fire, feral animals, weathering and insect damage. There has been no systematic survey of rock art in the park since 1996 and hence the condition of most recorded sites is largely unknown. There is also a lack of knowledge of the condition of sites that have not been formally recorded, particularly in areas that are difficult to access."</p> <p>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.</p> <p>The Draft Plan recommended actions include.</p> <p>"5.1.1 Develop and undertake a rock art conservation programme to address issues impacting on the condition of priority rock art sites, focusing on: (a) removal of vegetation contributing to the fire fuel load around priority rock art sites."</p> <p>"5.1.4 Maintain and update the park register of rock art sites, including information on their condition, conservation works and associated cultural knowledge. "</p> <p>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.</p> <p>I should add that one of our Kakadu trips which visited a large number of art sites in the Koolpin area was accompanied by two Aboriginal guides. The senior guide, now deceased, seemed happy with what we were doing and later came</p>

	<p>on another two or three trips with us on Aboriginal Land outside the park.</p> <p>"5.1.7 (b) replacement of Balanda place names with Bininj/Mungguy place names on park signage, on maps and in visitor publications where appropriate".</p> <p>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.</p> <p>Later in this section, under the heading, "Bininj/Mungguy cultural knowledge and practices" one of the performance indicators is "Opportunities for Bininj/Mungguy to visit country provided to support the continuity of culture." As mentioned previously, we have been offering to take people onto country for many years.</p> <p>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.</p>
<p>5.2 Looking after country</p>	<p>Stone country – Gu-warddewardde</p> <p>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.</p> <p>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.</p> <p>The Draft Plan refers to fire as a 'highly significant' threat. "The park has implemented a stone country fire management programme since 2006, and this has been successful in reducing the extent and intensity of fires. However, effective fire management over this remote, rugged and generally inaccessible region remains challenging and expensive."</p> <p>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.</p> <p>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.</p> <p>More than ten years ago, an Aboriginal guide who was accompanying one of my trips decided that the country where we were walking needed burning. This was in April, well before the normal burning was scheduled to take place. He lit a fire. My group was in no danger. That fire quickly</p>

burned itself out and left a patch which would have been protected from later burns.

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.

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.

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. Given the financial stress that the park is under, that would have to be a win-win situation for all concerned.

Details of something like this probably do not belong in a Plan of Management, but it is important that the Plan does not preclude their consideration.

As I do relatively little walking in the lowland forest and none at all in the floodplains, I cannot add anything to these sections other than to say they seem reasonable to me.

#### Rainforest – An-ngarre

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.

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 waster of money. The

	<p>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/Munggy guides. I refer to this again in the next section.</p>
<p>5.3 Managing park-wide threats affecting values</p>	<p>Money – it all comes down to money.</p> <p>This section 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.</p> <p>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.</p> <p>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.</p> <p>Weeds</p> <p>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.</p> <p>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.</p> <p>Feral Animals</p> <p>Feral cats are undoubtedly a problem. I have seen some publications which suggest that where dingoes are prevalent, they keep cat numbers under control. I have also seen something that suggests that the park</p>

	<p>dingo populations were badly hit by some sort of disease at some time in the past. 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.</p> <p>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.</p> <p>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 keen 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.</p> <p>Fire</p> <p>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.</p> <p>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 <a href="http://conservationbytes.com/2010/06/16/biodiversity-snafu/">http://conservationbytes.com/2010/06/16/biodiversity-snafu/</a></p>
<p>6. Kakadu as a visitor experience destination, commercial tourism and promotion</p>	
<p>6.1 Destination and visitor experience development</p>	<p><i>'People need to come here and relax, sit on the country, feel the spirits of this country, and go home and feel the same way.'</i> Natasha Nadji, Bunitj clan</p> <p>Going home and feeling the spirit of the country is something which is probably more true of people who do overnight bushwalks than of any other group who visit the park. Almost all of my clients rave about their experience on their trips to Kakadu, trips which can last up to three weeks. Many come back again and again. We are, however, only bringing in a third to half as many people into Kakadu as we did 20 years ago. Kakadu has lost its appeal to a large part of the travelling public.</p> <p>Previous initiatives to address the problem have had little effect. The decline in visitor numbers has continued.</p> <p>The draft plan mentions a desire to promote bushwalking and the desire</p>



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.

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.

'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.

Willis's Walkabouts runs bushwalking tours to a number of countries in addition to Australia. I recently led a four week trip to northern Sweden and Norway, about as wild as it is possible to get anywhere in Europe. A number of people on extended walks were accompanied by their dogs. I saw no problem with any of the dogs I met. There were places or places in particular seasons where they couldn't go, but mostly it was OK. That made me think about Australia and Kakadu.

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.

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?

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

	<p>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> <p>6.1.17 Keeping areas open for as long as possible and 6.1.18 staged opening and possible exclusive access are both very important to the viability of tourism businesses in the park. Crocodile management is not necessarily in conflict with this. For example, on at least one occasion, Willis's Walkabouts was permitted to drive into Koolpin, stopping before the camping area and crossing the ridge, coming down to Koolpin Creek above the waterfalls. There are a number of other areas where responsible tour operators and organisations such as the Darwin Bushwalking Club could be allowed in before croc surveys were completed as long as they made sure to keep well away from where the surveys were taking place. Doing something like that and presenting it to the public in the right way would give the park some good publicity and help counteract the 'Kakadon't' syndrome.</p> <p>Perhaps the best area where this could be done is Jim Jim Falls. It is not much more difficult to walk up the north side of the falls than on the existing track on the south. That was, in fact, the way I went on my first trip there in 1974. A couple of years ago, I offered to scout out a relatively easy route to the top and mark it for checking by park staff and traditional owners. This was turned down. An early opening of Jim Jim, even on this kind of a limited basis, would be a major benefit to some tour operators. It might be able to be set up so that local Bininj tour guides could accompany people on that walk. With people coming no closer to the pools below the falls than the car park, it should not have any effect on crocodile management.</p> <p>Having said that, if this is not done within the next few years, there may be no one experienced on that route who will still be available to assist in setting it out.</p> <p>Thinking further about crocodile surveys and opening times, has any thought been given to farming part of the task out to the private sector. The surveys take up a huge amount of staff time. If one or two rangers could supervise outside contractors, it would free others to work on the other jobs which need to be done before an area can be opened. Getting areas open earlier would increase visitation and, therefore, park revenue. It would also help to counter the 'Kakadon't' message that is still out with the general public.</p>
<p>6.2 Commercial tourism development and management</p>	<p><i>'Walking is good. You follow track ... you sleep, wake in morning to birds, maybe kookaburra. You feel country.'</i> Bill Neidjie, Bunitj clan</p> <p>'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.</p> <p>6.2.1 Commercial tourism operators will be promoted and will be encouraged to provide new visitor experiences in the park...'</p> <p>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</p>

	<p>individual operator websites will increase.</p> <p>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.</p> <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> <p>6.2.11 and 6.2.12 are both important. I applaud their inclusion and hope that they can be made to work.</p>
6.3 Promotion and marketing	<p><i>'I want visitors to feel something they'll never forget – and have in their heart and mind forever.'</i> Bessie Coleman, Wurrkbarbar clan</p> <p>Perhaps more than any other visitors to the park, people on long bushwalks feel this.</p> <p>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.</p> <p>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> <p>I run tours in the Kimberley as well as in Kakadu. While looking through a Kimberley guide book recently, I was somewhat surprised to find many more Aboriginal tours in the Broome area than in all of Kakadu. Overemphasising the cultural aspect of the park when there are relatively few ways for people to experience that culture will lead to disappointment. I have seen a number of different proposals for Aboriginal run tours, proposals made by traditional owners, come to nothing. I have no idea why that is the case, but I do know that this represents a weakness rather than a strength.</p> <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,</p>

	<p>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> <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>
6.4 Visitor information	<p>The program to update the signage in the park should go a long way to addressing some of the existing problems.</p> <p>The seasonal ranger program is one of the best things that the park does. It is a pity that a more limited form can't be kept throughout the year.</p> <p>Awareness of seasonal changes – and of the good reasons to visit Kakadu in the off-season – is something I've been promoting for longer than I've been in business.</p> <p>"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."</p> <p>We already visit one or both on most of our trips that don't enter and exit via Pine Creek. The small visitor centre at Mary River is worth a mention as well. I've stopped there a few times and have found it well worth while.</p>
7. Research and knowledge management	
7.1 Research and knowledge management	<p>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.</p> <p>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. It is far better for people to find information there than on sites like the one mentioned in 5.3.</p> <p>Most people visiting a website leave quickly. If there is enough information there, people will stay longer and take home the message that you would like them to take home. I try and make my own website as informative as possible. According to Google Analytics, a small but reasonable number spend three hours or more on a visit. Can the Kakadu website say the same?</p> <p>"Effective methods for storing, managing and retrieving park data and</p>

	<p>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>
8. Living in the park	
8.1 Outstations and living on country	<p>Given the existing situation, I don't see what else could be said or done.</p> <p>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.</p>
8.2 Jabiru	<p>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.</p>
9. Administration and business management	<p>9.1 Safety and incident management</p> <p>"Bininj/Mungguy feel a sense of responsibility for all people visiting their country, and feel distressed if a visitor is injured or dies."</p> <p>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.</p> <p>"A number of the activities popular in the park involve a level of risk to visitors. Although the park makes information available, some visitors still appear unaware of or indifferent to potential risks."</p> <p>It is worth noting that there is an inherent danger involved in visiting wild places. this can be minimised but it can never be completely eliminated. There will always be deaths in Kakadu and every other major park in the world. The park service can only do so much to protect people from themselves and from other dangers. Death in parks need to be seen in context. You do what you reasonably can to prevent them, but at the same time accept them as inevitable.</p> <p>We once had someone die of a heart attack on one of our Kimberley trips. While he had had no previous signs of a heart problem, the autopsy said that, given the nature of his coronary blockage, he would almost have certainly have died if he had had the same heart attack while visiting someone in hospital. He died doing something he loved. The only way to be 100% sure that deaths like that do not occur in a park is to keep all people out.</p> <p>"9.1.3 Access to sites subject to seasonal closure within the park will be assessed and considered safe before being opened to visitors and residents."</p> <p>"9.1.6 Visitor safety will be a primary consideration in decisions about site access and in park interpretation material and visitor information."</p> <p>To me, the problem appears to be striking a sensible balance.</p>

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.

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.

#### 9.2 Compliance and enforcement

All seems OK.

#### 9.3 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, camping and special-access sites."

This is good in principle and something that most bushwalkers would want. It is likely to prove very difficult in practice.

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.

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.

It would help if there were more approved routes. I walked in many areas no longer on approved routes before the approved route system was introduced. I believe that I should be able to work out routes that would avoid sites of significance and would be happy to pay one of the traditional owners to accompany a group who would attempt to map out a new route.

If people saw more areas being opened than closed, it would be one more thing to counteract the 'Kakadon't' message which I encounter all too often.

#### 9.4 to 9.6

All seems reasonable

#### 9.7 Neighbours, stakeholders and partnerships

All seems reasonable. The cessation of mining at Ranger will almost certainly have a major impact on Jabiru and on the park which surrounds

	it. The sooner planning can begin as to what will follow, the better it will be for all concerned.
PART D - MANAGING USE OF KAKADU NATIONAL PARK	
10. Managing Use of Kakadu National Park	
There is a great deal in this section. Overall, it seems reasonable to me. I would, however, like to comment on a few things.	
10.1 Authorisation of allowable activities	No further comment.
10.2 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.
10.3 Living in the park (outstations and Jabiru)	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.
10.4 Access	<p>"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. "</p> <p>It's very good to have that statement in the plan.</p> <p>"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."</p> <p>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.</p>
10.5 Commercial use of resources	No further comment.
10.6 Traditional use of land and water	<p>"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."</p> <p>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.</p>
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>
10.8 Commercial tourism and accommodation	<p>Commercial tourism</p> <p>"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."</p> <p>I would be very interested to learn more about this if it might apply to bushwalking routes not currently permitted.</p> <p>Everything in this section seems reasonable.</p> <p>Commercial accommodation</p> <p>I am pleased to see the possibility of new accommodation gets a mention.</p> <p>The other parts of this chapter are outside my area of expertise. They all seem reasonable to me.</p>
10.9 Filming and photography (and other commercial image capture)	No further comment.
10.10 Commercial fishing	No further comment.
10.11 Infrastructure and works	No further comment.
10.12 Research and monitoring activities and access to genetic resources	No further comment.
10.13 Bringing plants, animals and other materials into the park	No further comment.
Appendices	<p>Appendix E</p> <p>If more people read this, they would have a better appreciation of just how much work is involved in getting a plan up and running. They might also begin to appreciate some of the procedures required by joint</p>



	management.
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### Other comments on the draft management plan

#### Concluding thoughts

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. I have seen this work elsewhere in Australia and overseas.

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'.

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.

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.

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.

#### Any other general comments

If you are attaching any documents to your submission please note them here.

Although the deadline for submissions has been extended, I decided that I would send this in now. If I have time, I will send in an edited version to replace this one. If not, this can stand as my final submission.

### Submitting your comments

Now you have finished making your comments please email or post your submission to:

1. Email address: [KakaduPlan@environment.gov.au](mailto:KakaduPlan@environment.gov.au) or
2. Postal address: Park Manager, Kakadu National Park  
PO Box 71  
Jabiru NT 0886

Thank you for taking the time to comment on the Kakadu draft management plan.