

gnaraloo wilderness foundation

PO Box 632 Australind Western Australia 6233 +61 (0) 418 923 880
office@gnaraloo.org ABN 322 9471 1659 www.gnaraloo.org
@gnaraloo @gnaraloo @gnaraloo @gnaraloo @gnaraloo

22 May 2019

To

Department of Biodiversity, Conservation and Attractions, Western Australia
Nyinggulu (Ningaloo) Coastal Reserves Plan Coordinator
Planning Unit
Parks and Wildlife Service
Department of Biodiversity, Conservation and Attractions
Locked Bag 104
Bentley Delivery Centre WA 6983

Submission by the Gnaraloo Wilderness Foundation

Nyinggulu (Ningaloo) coastal reserves draft joint management plan 2019

The Gnaraloo Wilderness Foundation (GWF) is a not-for-profit charity with a broad membership. We wish to make the following submissions concerning the document. The closing date for public submissions is 14 May 2019.

Re the entire Gnaraloo coastline

1. The GWF supports maintenance of the status quo re low-key camping and caravanning, with high levels of self-sufficiency by visitors, along the entire Gnaraloo coastline given its heritage, biological and geological character and significance.

Re the Gnaraloo Bay location

2. The GWF supports retention of the Gnaraloo Bay node *in perpetuity* as a Day Use site only. The GWF does not support any built accommodation at this location, now or in future, given its importance as a nesting area for endangered sea turtles that are protected under national and international legislation.
3. The GWF strongly disagrees that the current Gnaraloo Bay car park is poorly located (Ref. Plan, "Day Use Sites", pg 82). The car park's present location keeps human activities away from some of the most important nesting areas used by sea turtles. It shouldn't be moved. Fencing is not needed at Gnaraloo Bay nor should new fencing be put in place as it detracts from the visual experience and enjoyment of a wilderness area and poses risk to native animals such as kangaroos and emus (Ref. Plan, "Day Use Sites", pg 83).

gnaraloo wilderness foundation

📍 PO Box 632 Australind Western Australia 6233 📞 +61 (0) 418 923 880
✉️ office@gnaraloo.org 📄 ABN 322 9471 1659 🌐 www.gnaraloo.org
📱 @gnaralooowf @turtlesgnaraloo

Re the Gnaraloo Cape Farquhar location

4. Despite the plan stating that its aim is to maintain the status quo and not to introduce any new development, the GWF notes the DBCA's intended changes to the Gnaraloo Cape Farquhar location. The GWF does not support the intended new camping at the Gnaraloo Cape Farquhar location as its important habitat nesting beaches for endangered loggerhead sea turtles and should be retained and kept as a wilderness area given its current lack of disturbance and human activities. It is very rare in the world today to have a chance to be able to do so. Refer to the data and findings of the scientific Gnaraloo Turtle Conservation Program (GTCP) (www.gnaraloo.org).
5. It is contradictory for the DBCA to target a highly sensitive and ecologically important location such as the Farquhar area to introduce increased human activities as it is one of the most important coastal nesting areas for endangered loggerhead sea turtles in WA. The GWF's position is that there should be no development of any kind at or near the sea turtle nesting beaches of the Gnaraloo Cape Farquhar location.
6. Map 3D "Recreation site classification and access" (Ref. Plan, pg 137) shows Marine Sanctuary Zones (MSZ) areas on the Gnaraloo coastline, but the shading out (i.e. map dotting) are blanked-out in places at the Bulbarli Reef, Cape Farquhar, Gnaraloo Bay and Nature Bay locations. This incorrectly creates the impression that the MSZ at these locations do not cover/reach those places and may be targeted for development. The GWF calls on the DBCA to completely shade out these positions in all maps as they are entirely MSZ areas without exceptions.

Re the Gnaraloo turtle nesting beaches

7. The GWF invites formal recognition of Gnaraloo Bay and Gnaraloo Cape Farquhar as very important and sensitive turtle nesting habitat beaches for endangered loggerhead (*Caretta caretta*) sea turtles with protection from human disturbances and development in any form. Refer to the published findings of the scientific Gnaraloo Turtle Conservation Program.
8. The GWF calls for continued protection of the nesting beaches at the Gnaraloo Bay Rookery, the Gnaraloo Cape Farquhar Rookery and the entire Gnaraloo coastline as important turtle and shore bird nesting areas, with continued no 4WD access and no built accommodation developments.
9. The GWF calls for the beaches north of 6Mile gate at Gnaraloo Bay and at Farquhar to be closed to unmanaged visitor access during the sea turtle nesting period (November to May).

Re scientific data and references for the Ningaloo Coast

10. The plan does not reference or point to the successful and extensive non-Government management activity on the Ningaloo Coast before it, which is a loss for the rich cultural, scientific and heritage records of the State of Western Australia and its people. For example, the remarkable on-ground work, achievements and results of the scientific GTCP that monitored and managed the endangered loggerhead sea turtles at Gnaraloo (2008 – 2018). Another example is the unique and highly successful Gnaraloo Feral Animal Control Program (GFACP) (2008 – 2015) that afforded 100% protection to turtle rookeries from feral animal predation until the Government took over the coastal tenure at Ningaloo.
11. The plan calls for scientific information, entry of same into data bases and regional/district libraries for information and use by the new Joint Management Body and DBCA [Ref. Plan, Section 28 “Research and monitoring” – Management strategies 4 – 5 (pg 99)]. However, there is no reference anywhere in the plan to the extensive scientific work of the scientific GTCP and GFACP.
12. The GWF calls for the plan to better reference, describe and include the scientific findings of the GTCP (refer <http://gnaraloo.org/our-reports-and-papers/>) [i.e. Plan, Section 12 “Native animals and habitats” – “Fauna of conservation significance” (pg 43) and “Majun/Turtles” (pg 46) and “References”, (pg 100)].
13. The GWF calls for the plan to better reference, describe and include the findings of the GFACP (refer <http://gnaraloo.org/our-reports-and-papers/>) [i.e. Plan, Section 15, “Introduced and other problem animals / Foxes and feral cats” (pg 55) and “References” (pg 100)].
14. Section 15 Introduced and other problem animals, Management Objectives, pg 58: Re the Performance measures and Targets for “Introduced animal control plan” and “Integrated predator control program”. The plan needs to include reference that the GFACP fulfilled and delivered these actions to the State of Western Australia during 2008 – 2015, with turtle egg predation from feral animals kept at 0%. For the record, the feral animal control work was stopped from 1 July 2015 due to tenure changes by the State Government.
15. The GWF notes that the same Section 15, “Introduced and other problem animals” (pg 55) does not have a section or discussion of wild dogs. The GWF calls on inclusion into Section 15 of this real management threat to sea turtles and other native wildlife in the planning area.

Re support of external research organisations on the Ningaloo Coast

16. The plan states encouragement and support to external research where it directly aligns with the strategies, implementation and auditing of the plan [Ref. Plan, Section 12 “Native animals and habitats” – Management strategies 16 and 22 (pg 49) and Section 28 “Research and monitoring” – Management strategy 11 (pg 99)]. However, the GWF is going on record to state that it has not received the support that the people of Western Australia would expect the DBCA to have given it for its public-sector benefit research on the loggerhead sea turtles at Gnaraloo during 2008 - 2019.
17. Section 12 “Native animals and habitats” – Management strategies 13 and 14 (pg 49). The plan needs to include history of the planning area at Gnaraloo and reference that the GTCP fulfilled and delivered these actions to the State of Western Australia during 2008 – 2018. For the record, the sea turtle and feral animal monitoring field work by the GTCP and GWF stopped from 1 July 2019 due to the continued lack of support from DBCA and the State Government.
18. The plan states that further research and monitoring baseline is required and that the intent is to support research. Given the large amount of work set out in the plan and limiting resources, DBCA cannot do all the required research and work set out in the plan by itself. It would serve the Australian people and the State of Western Australia if the DBCA reached out to better integrate and include third party organisations like the GWF to deliver sea turtle programs at Ningaloo with it and the Baiyungu people.
19. Despite requests for support, the GWF / GTCP received no support or help from the DBCA or the State Government for its continued sea turtle field work during the field season 2018/19, which has resulted in a break in the 30-year scientific baseline for loggerheads that it can be delivering to the Australian people. The following excerpts from the Executive Summary of the 10 year GTCP report (2008-18, pg 11):

“Current indications are that the valuable turtle and feral animal Monitoring, Evaluation, Reporting and Improving (MERI) research work at Gnaraloo by the GTCP, in the form undertaken during 2008/09 – 2017/18 with full season nesting surveys from November to February, will end on 30 June 2018. There is because, at the time of this report, there is no funding from private or public sources (including from the Gnaraloo Station Trust or co-investment grants from Government) for continuation of this work. Some of the implications of the GTCP ending on 30 June 2018 in its current format

gnaraloo wilderness foundation

📍 PO Box 632 Australind Western Australia 6233 📞 +61 (0) 418 923 880
✉ office@gnaraloo.org 📄 ABN 322 9471 1659 🌐 www.gnaraloo.org
📱 @gnaraloo @gnaralooof @turtlesgnaraloo

*(i.e. daily surveys during consecutive annual full nesting periods for 10 years) are that the 30-year consecutive baseline data set of nesting by loggerhead sea turtles in the GBR Survey Area will be broken and lost. The GTCP research field teams will also no longer be present to notice and rescue stranded female sea turtles in real time during the nesting period nor to monitor and record the impact of feral animals on turtle Nests, including the possible return of European red foxes (*Vulpes vulpes*) in future. The level of Predation of turtle Nests by foxes may return to the high levels reported for the GBR Survey Area prior to 2008/09, but will go unnoticed as the research undertaken to date by the GTCP will no longer be conducted in the GBR Survey Area. We will all be the poorer for this.*

Given the important findings by the private sector driven scientific sea turtle survey program at Gnaraloo over the past decade, there is a high likelihood that there are other important turtle nesting hotspots on beaches of the southern Ningaloo Coast from Quobba Station to Coral Bay. To the authors' knowledge, these beaches along the southern Ningaloo Coast have never been systematically surveyed via scientific on-ground long-term surveys. As such, potential unknown critical sea turtle nesting habitat on beaches of the southern Ningaloo Coast are not currently specifically protected from potential threats, such as driving on beaches, camping activities and/or inappropriate future coastal development”.

20. The GWF requests support being offered to it by the DBCA to work with it and the Baiyungu people for continued satellite tagging of the endangered loggerheads on the Gnaraloo coastline, at the Gnaraloo Bay Rookery and the Gnaraloo Cape Farquhar Rookery.

Re recreational fishing on the Ningaloo Coast

21. The community expectation, supported by the GWF, is for no allowable hunting or fishing in the marine sanctuary zones of the Ningaloo Marine Park as it would make a mockery of the concept and draw heavy public criticism of hypocrisy (Ref. Plan, Section 21 “Visitor Activities”, “Fishing”, pg 85).

gnaraloo wilderness foundation

PO Box 632 Australind Western Australia 6233 +61 (0) 418 923 880
@office@gnaraloo.org ABN 322 9471 1659 www.gnaraloo.org
@gnaraloo @gnaraloo @gnaraloo @gnaraloo @gnaraloo @gnaraloo

22. The GWF calls for the establishment and enforcement by Government of stricter daily fishing bag limits and quotas, and for no transportation of fish/fillets to be allowed offsite. This would better protect the fishing stock of the planning area and ensure sustainability and continued satisfactory experiences by all anglers.

Yours sincerely

Karen Hattingh Chair

For the Gnaraloo Wilderness Foundation Inc.

Ningaloo Coast World Heritage Area, Western Australia